



United States Government

Department of Energy

NOV 19 2018

memorandum

Carlsbad Field Office
Carlsbad, New Mexico 88221

DATE: NOV 19 2018

REPLY TO
ATTN OF: CBFO:OQA:MPN:JM:18-2526:UFC 2300.00

SUBJECT: Evaluation of the CAPs for CBFO CARs 18-051, 18-052, 18-053, 18-055, 18-056, and 18-057
Resulting from CBFO Audit A-18-04

TO: Jim Malmo, DOE-ID

The Carlsbad Field Office (CBFO) has completed its evaluation of the Corrective Action Plans (CAPs) associated with CBFO Corrective Action Reports (CARs) 18-051, 18-052, 18-053, 18-055, 18-056 and 18-057, resulting from audit A-18-04, Recertification of the Advanced Mixed Waste Treatment Project (AMWTP). The audit was conducted August 27 – 30, 2018. As documented on the enclosed CAR Continuation Sheets, the evaluation indicates that the CAPs are rejected. The CAP investigative actions do not address the extent and impact of the deficiencies and its results of the investigation in order to provide adequate measures for precluding recurrence.

If you have any questions concerning the evaluation, please contact me at (575) 234-7483.

Martin P. Navarrete
Senior Quality Assurance Specialist

Attachment

181115



J. Malmo, DOE-ID

- 2 -

cc: w/attachment

R. Murray, EM	*ED
T. Shrader, CBFO	ED
D. Gadbury, CBFO	ED
K. Princen, CBFO	ED
C. Fesmire, CBFO	ED
D. Miehl, CBFO	ED
M. Stapleton, CBFO	ED
H. Cruickshank, CBFO	ED
J. Zimmerman, DOE-ID	ED
T. Jenkins, DOE-ID	ED
J. Vliet, DOE-ID	ED
D. Pruitt, DOE-ID	ED
G. Byram, AMWTP	ED
J. McCoy, AMWTP	ED
E. Gulbransen, AMWTP	ED
E. Dumas, AMWTP	ED
S. Poling, AMWTP	ED
R. Hubler, AMWTP	ED
A. Morse, AMWTP	ED
G. Tedford, AMWTP	ED
J. Walsh, EPA	ED
J. Ellis, EPA	ED
T. Peake, EPA	ED
E. Feltcorn, EPA	ED
J. Kieling, NMED	ED
R. Maestas, NMED	ED
D. Biswell, NMED	ED
H. Tellez, NMED	ED
M. McLean, NMED	ED
T. Runyon, CTAC	ED
P. Martinez, CTAC	ED
C. Castillo, CTAC	ED
P. Hinojos, CTAC	ED
J. Vernon, CTAC	ED
G. White, CTAC	ED
Site Documents	ED
CBFO QA File	
CBFO M&RC	

CAR CONTINUATION SHEET

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Block #16 Acceptance of Proposed Corrective Actions:

An evaluation was performed of the Corrective Action Plan (CAP) developed to address Carlsbad Field Office (CBFO) Corrective Action Report (CAR) 18-051. The CAP was submitted via Department of Energy (DOE), Idaho Operations Office letter CLN190181, dated November 6, 2018, from James a. Malmø, Assistant Manager, Waste Disposition Division, to Mr. Martin Navarrete, Senior Quality Assurance Specialist, CBFO Quality Assurance.

Italicized text, taken verbatim from the CAP, is used to reflect the correlation between the actions required by the CAR and the method used for evaluation.

REMEDIAL ACTIONS

- Discussed with Operators the requirements of storing documents in a one-hour (min.) fire-rated file cabinet until transmittal to Records Management.*
- Obtained one-hour (min.) fire-rated file cabinets.*
- Records identified during audit were reviewed and placed in a one-hour (min.) fire-rated file cabinet pending transmittal to Records Management.*
- Records Analyst/Records Coordinator transmitted final records to Records Management.*

Evaluation:

The remedial actions described above are deemed appropriate to address the condition adverse to quality (CAQ) identified in the CAR.

INVESTIGATIVE ACTIONS

Following the initial condition identified by the CBFO audit team, a check of other operations areas was conducted that identified RTR 101/106 Daily Safety Checks, (FRM-2333), RTR 1001, (FRM-2352), IQI Verification, (FRM-2188) along with Assay 102/103/105 System Daily Performance Checks, (FRM-2062), and Assay System Tamper Seal Verification (FRM-2061), forms were not properly stored in a one-hour (min.) fire-rated file cabinet or transmitted to Records Management in a timely manner.

Evaluation:

Not Accepted. As described in CBFO MP 3.1 *Corrective Action Reports*, Revision 15, investigative action is "Investigation performed to identify the direct and/or contributing causes(s), as well as the extent and impact of a CAQ." The investigative actions do not adequately describe the degree of impact/extent of the condition beyond the specific condition listed in the CAR.

ROOT CAUSE DETERMINATION

Not required for this CAR.

ACTIONS TO PRECLUDE RECURRENCE

- Assign trained Records Analyst/Records Coordinator to assist RWMC-AMWTP with the maintenance, protection storage and transmittal of records.*
Actionee: David Becker
Scheduled Completion Date: 11-28-18

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2. *RWMC-AMWTP RTR and Assay Operators shall complete required read of MCP-557, Records Management and MCP-2064, Implementing Records Management Process.*
Actionee: David Becker
Schedule Completion Date: 11-28-18

Evaluation:

The proposed corrective actions are deemed appropriate to address the condition documented in the CAR and provide reasonable assurance of precluding the likelihood of recurrence.

REJECTION

The results of the CAP evaluation indicate that the remedial actions and proposed corrective actions satisfactorily address the CAQ documented in CAR 18-051, and provide adequate measures for precluding recurrence. However, the investigative actions response (impact/extent) is incomplete per procedure. For this reason, the CAP for CAR 18-051 is rejected.

Priscilla Yanez
Evaluation Performed By: Priscilla Yanez, CTAC

November 15, 2018
Date

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Block #16 Acceptance of Proposed Corrective Actions:

An evaluation was performed of the Corrective Action Plan (CAP) developed to address Carlsbad Field Office (CBFO) Corrective Action Report (CAR) 18-052. The CAP was submitted via UFC: 6150, Disposition Authority: ENVI-j-1, CLN190181, dated November 6, 2018, from James A. Malmø, Assistant Manager, Waste Disposition Division, to Mr. Martin P. Navarrete, Senior Quality Assurance Specialist, CBFO Quality Assurance.

Italicized text, taken verbatim from the CAP, is used to reflect the correlation between the actions required by the CAR and the method used for evaluation.

REMEDIAL ACTIONS

1. Generate a PMJ to change the status in Maximo (the EAM) from "Operating" to "RFS-Permanent" for the 38 M&TE assets identified.

Actionee: Kevin Bake

Scheduled Completion Date: 8/30/18

2. Update the Equipment List

Actionee: Lisa Boucher

Scheduled Completion Date: 9/4/18

Evaluation:

The remedial actions described above are deemed appropriate to address the condition adverse to quality (CAQ) identified in the CAR.

INVESTIGATIVE ACTIONS

An equipment list of all M&TE assets was compared with a list of all M&TE PMs to look for any M&TE that had a status of "Operating" but did not have an active PM. After comparing the two lists, it was discovered that 38 of the 691 assets on the equipment list had been removed from service, but the status in the Computerized Maintenance Management System was still showing as "Operating" instead of "RFS-Permanent" (Permanently Removed from Service). Of the 38 M&TE assets found, 36 were canceled in 2007 or earlier, while two were identified as being canceled in 2013.

Evaluation:

Not Accepted.

The investigative actions do not adequately describe the degree of impact of the condition beyond the specific condition listed in the CAR. As stated in CBFO MP 3.1 *Corrective Action Reports*, Rev 15, Investigation Action is defined as "Investigation performed to identify the direct and/or contributing causes(s), as well as the extent and impact of a CAQ.

ROOT CAUSE DETERMINATION

Not required for this CAR.

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ACTIONS TO PRECLUDE RECURRENCE

1. *No further actions required. The remedial actions taken were to correct a condition that was created years ago.*

In the current revision of TPR-7998, Calibration And Control of Measuring and Test Equipment, step 4.8.6 instructs the CMMS Administrator to "Update CMMS to take M&TE out-of-service." This particular step was not added to the procedure until a revision that was issued on 03/19/08. Previous to the revision, there was not a section in the procedure giving any instruction on how to retire M&TE.

Investigative actions identified 38 assets, 36 of which were canceled in 2007 or earlier and two that were canceled in 2013. All 38 assets have been updated to reflect correct status in Maximo.

As no changes in status were identified where the equipment list was not updated past 2013; and with approximately 70 asset items having been processed in accordance with TRP-7998, Step 4.8.6 since 2014 with no issues, this demonstrates that the current procedures and processes are already precluding further recurrence and no additional action is needed.

Actionee: N/A

Scheduled Completion Date: NIA

Evaluation:

The proposed corrective actions are deemed appropriate to address the condition documented in the CAR and provide reasonable assurance of precluding the likelihood of recurrence.

REJECTION

The results of the CAP evaluation indicate that the remedial actions and proposed corrective actions satisfactorily address the CAQ documented in CAR 18-052, and provide adequate measures for precluding recurrence. However, the response to the investigative actions (impact) is less than adequate. For this reason, the CAP for CAR 18-052 is rejected. Any indications resulting from the investigative actions (impact results) suggesting that further corrective actions may be needed should be addressed in the actions to preclude recurrence portion of the revised CAP.


Evaluation Performed By: B.J. Verret, CTAC

11/15/2018

Date

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1. CAR No: 18-053

2. Activity No: A-18-04

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Block #16 Acceptance of Proposed Corrective Actions:

An evaluation was performed of the Corrective Action Plan (CAP) developed to address Carlsbad Field Office (CBFO) Corrective Action Report (CAR) 18-053. The CAP was submitted via Department of Energy (DOE), Idaho Operations Office letter CLN190181, dated November 6, 2018, from James A. Malmo, Assistant Manager, Waste Disposition Division, to Mr. Martin Navarrete, Senior Quality Assurance Specialist, CBFO Quality Assurance.

Italicized text, taken verbatim from the CAP, is used to reflect the correlation between the actions required by the CAR and the method used for evaluation.

REMEDIAL ACTIONS

Evaluation:

Not Accepted

Since there are no remedial actions specified in the CAP, this CAP cannot be accepted.

INVESTIGATIVE ACTIONS

CW-216 was to be revised to assign IDCs to SRP waste outputs that were managed by TRUCON codes by CCP for off-site shipment to WIPP. Fluor does not manage waste by TRUCON codes, waste is managed by IDCs. The output waste was discussed between the VEEs and AKEs to determine the variations in output waste contents. The IDCs were developed to be equivalent to expected TRUCON codes. The IDCs would be presented in a future Waste Stream Profile package for TRUCON code assignments. The IDC could be assigned to the waste by SDCR after VE.

To be proactive, it was recommended that the CW-216 be discontinued and replaced with 3 new IDCs assigned at the time of VE. Revision 40 of RPT-TRUW-05 proposed three IDCs:

- BN-216 -Primarily inorganic sludge with any identified RF-003 or RF-743 waste,*
- BN-217 -Primarily inorganic sludge with no identified RF-003 or RF-743 waste,*
- BN-218 -Primarily organic sludge.*

After further investigation into whether the new proposed IDCs were equivalent to TRUCON codes it was determined to revise the IDCs and not to assign these at the time of VE. Revision 42 of RPT-TRUW-05 effective 08/07/18, included the revised JDCs as follows:

- BN-215 – Primarily organic homogeneous solids with $\geq 50\%$ identified RF-003 or RF-743 waste,*
- BN-216 - Primarily inorganic homogeneous solids with any identified RF-003 or RF-743 waste but $<50\%$ by volume,*
- BN-217 – Primarily inorganic sludge with no identified RF-003 or RF-743 waste.*

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These IDCs were presented to the VEEs by the AKE SME and after understanding and concurrence of the IDCs by the VEEs, it was agreed to initiate assignment of these IDCs during VE.

Evaluation:

Not Accepted

As described in CBFO MP 3.1, *Corrective Action Reports*, Revision 15, investigative action is "Investigation performed to identify the direct and/or contributing causes(s), as well as the extent and impact of a CAQ." The investigative actions do NOT adequately describe the direct and/or contributing causes of the condition adverse to quality (CAQ) or the extent of condition and degree of impact of the condition beyond the specific condition listed in the CAR.

ROOT CAUSE DETERMINATION

Not required for this CAR.

ACTIONS TO PRECLUDE RECURRENCE

1. *Develop and provide tailgate training for VEEs to address that CW-216 is not being used and has been replaced with IDCs BN-216, BN-217 and BN-218.*

*Actionee: Steve Carpenter
Scheduled Completion Date: 11-01-18*

2. *VEEs provide tailgate training for VE operators to address that CW-216 is not being used and has been replaced with IDCs BN-216, BN-217 and BN-218.*

*Actionee: Matt Hutson/Luke Grover
Scheduled Completion Date: 11-15-18*

Evaluation:

Not Accepted

The proposed corrective actions appear to be remedial actions and are NOT adequate to address the condition documented in the CAR or provide reasonable assurance of precluding the likelihood of recurrence.

ACCEPTANCE

The results of the CAP evaluation indicate that the remedial actions, proposed corrective actions, investigative actions regarding extent of condition and degree of impact of condition, and adequate measures for precluding recurrence do NOT satisfactorily address the condition adverse to quality documented in CAR 18-053. For these reasons, the CAP for CAR 18-053 is rejected.

 FOR

Evaluation Performed By: Randy Fitzgerald, CTAC

11-16-18

Date

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Block #16 Acceptance of Proposed Corrective Actions:

An evaluation was performed of the Corrective Action Plan (CAP) developed to address Carlsbad Field Office (CBFO) Corrective Action Report (CAR) 18-055. The CAP was submitted via Department of Energy Idaho Operations Office (DOE ID) letter ENVI-j-1 CLN190181 UFC:6150, dated November 6, 2018, from Mr. James A. Malmo, Assistant Manager, Waste Disposition Division, DOE ID, to Mr. Martin Navarrete, Senior Quality Assurance Specialist, CBFO Office of Quality Assurance.

Italicized text, taken verbatim from the CAP, is used to reflect the correlation between the actions required by the CAR and the method used for evaluation.

REMEDIAL ACTIONS

- 1. It is understood that RPT-TRUW-05 is a necessary document that supports the RTR process in the characterization of waste containers. SCR-5120 was generated on 8/30/18 to add RPT-TRUW-05 as a document filed on the RTR analysis report so the current revision of the report can be documented.*

Evaluation:

The remedial actions described above are deemed appropriate to address the condition adverse to quality identified in the CAR.

INVESTIGATIVE ACTIONS

During the review of RTR operations in WMF-634 on 8/28/18, the RTR operator had the correct version of RPT-TRUW-05 available in the control room, and showed the auditor the process for verifying the correct revision using EDMS. The revision of RPT-TRUW-05 is not documented in our current RTR process, but is used as a reference document to verify that the physical form of the waste is consistent. Results of the RTR inspection are documented in WTS.

Evaluation:

Not Accepted

As described in CBFO MP 3.1, *Corrective Action Reports*, Revision 15, investigative action is "Investigation performed to identify the direct and /or contribution causes(s), as well as the extent and impact of a CAQ." The investigative actions do not adequately describe the degree of impact/extent of the condition beyond the specific condition listed in the CAR.

ROOT CAUSE DETERMINATION

Not required for this CAR.

ACTIONS TO PRECLUDE RECURRENCE

Evaluation:

Not Accepted

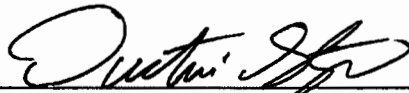
The Actions To Preclude Recurrence was not specified in the CAP; therefore this CAP cannot be accepted.

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1. CAR No: 18-055	2. Activity No: A-18-04	3. Page 2 of 2
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REJECTION

The results of the CAP evaluation indicate that the proposed corrective actions, investigative actions regarding extent of condition and degree of impact of condition, and adequate measures for precluding recurrence do NOT satisfactorily address the condition adverse to quality documented in CAR 18-055. For these reasons, the CAP for CAR 18-055 is rejected.



Evaluation Performed By: Dustin Stegman, CTAC

11-15-18

Date

CAR CONTINUATION SHEET

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Block #16 Acceptance of Proposed Corrective Actions:

An evaluation was performed of the Corrective Action Plan (CAP) developed to address Carlsbad Field Office (CBFO) Corrective Action Report (CAR) 18-056. The CAP was submitted via Department of Energy Idaho Operations Office (DOE ID) letter ENVI-j-1 CLN190181 UFC:6150, dated November 6, 2018, from Mr. James A. Malmo, Assistant Manager, Waste Disposition Division, DOE ID, to Mr. Martin Navarrete, Senior Quality Assurance Specialist, CBFO Quality Assurance.

Italicized text, taken verbatim from the CAP, is used to reflect the correlation between the actions required by the CAR and the method used for evaluation.

REMEDIAL ACTIONS

DCR 360103 was immediately initiated to add the VEE Role and Responsibilities to TPR-7997.

Evaluation:

The remedial actions described above are deemed appropriate to address the condition adverse to quality identified in the CAR.

INVESTIGATIVE ACTIONS

Visual examination procedures related to PLN-5198 and PLN-5199 were evaluated to determine if similar condition existed where duties and responsibilities of the Visual Examination Expert were not addressed.

Investigation results identified that TPR-8041 and TPR-8103 require the same revision to include duties and responsibilities of the Visual Examination Expert.

Evaluation:

Not Accepted. As described in CBFO MP 3.1, *Corrective Action Reports*, Revision 15, investigative action is "Investigation performed to identify the direct and/or contributing causes(s), as well as the extent and impact of a CAQ." The investigative actions do not adequately describe the degree of impact/extent of the condition beyond the specific condition listed in the CAR.

ROOT CAUSE DETERMINATION

Not required for this CAR.

ACTIONS TO PRECLUDE RECURRENCE

1. *DCR 360116 was initiated to add the VEE Role and Responsibilities to TPR-8041. Revised document to be submitted to CBFO for review and approval. 10/15/18*
2. *DCR 360117 was initiated to add the VEE Role and Responsibilities to TPR-8103. Revised document to be submitted to CBFO for review and approval. 10/15/18*
3. *DCR 360103, initiated as part of Remedial Actions, added the VEE Role and Responsibilities to TPR7997. Revised document to be submitted to CBFO for review and approval. 10/15/18*
4. *Upon CBFO approval of procedures, a required read will be completed for TPR-7997, TPR-8041 and TPR8103. Target audience to complete required read is qualified Visual Examination Operators and Visual Examination Experts. 1/31/19*

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Evaluation:

The proposed corrective actions are deemed appropriate to address the condition documented in the CAR and provide reasonable assurance of precluding the likelihood of recurrence.

REJECTION

The results of the CAP evaluation indicate that the remedial actions and proposed corrective actions satisfactorily address the condition adverse to quality documented in CAR 18-056, and provide adequate measures for precluding recurrence. However, the response to the investigative actions (impact/extent) is less than adequate. For this reason, the CAP for CAR 18-056 is rejected. .

 FOR

Evaluation Performed By: Charles L. Riggs, CTAC

11-16-18

Date

CAR CONTINUATION SHEET

1. CAR No: 18-057

2. Activity No: A-18-04

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Block #16 Acceptance of Proposed Corrective Actions:

An evaluation was performed of the Corrective Action Plan (CAP) developed to address Carlsbad Field Office (CBFO) Corrective Action Report (CAR) 18-057. The CAP was submitted via Department of Energy Idaho Operations Office (DOE ID) letter ENVI-j-1 CLN190181 UFC:6150, dated November 6, 2018, from Mr. James A. Malmo, Assistant Manager, Waste Disposition Division, DOE ID, to Mr. Martin Navarrete, Senior Quality Assurance Specialist, CBFO Quality Assurance.

Italicized text, taken verbatim from the CAP, is used to reflect the correlation between the actions required by the CAR and the method used for evaluation.

REMEDIAL ACTIONS

- 1. NCR 123083 has been initiated for identification and tracking disposition path for Containers 10648006, 10647842, 10648011, 10648010.*
- 2. Operator read and signed RPT-TRUW-05 revision 42 immediately upon identification.*

Evaluation:

The remedial actions described above are deemed appropriate to address the condition adverse to quality identified in the CAR.

INVESTIGATIVE ACTIONS

Investigative actions confirmed that Containers 10648006, 10647842, 10648011 and 10648010, from batch VEA1800084 were the only containers affected. NCR 123083 was initiated for identification and tracking disposition path forward.

Completion of required read for RPT-TRUW-05, Revision 42 was evaluated and only one person had not completed the required read.

Evaluation:

Not Accepted. As described in CBFO MP 3.1, *Corrective Action Reports*, Revision 15, investigative action is "Investigation performed to identify the direct and /or contributing causes(s), as well as the extent and impact of a CAQ." The investigative actions do not adequately describe the degree of impact/extent of the condition beyond the specific condition listed in the CAR.

ROOT CAUSE DETERMINATION

Not required for this CAR.

ACTIONS TO PRECLUDE RECURRENCE

Build Qualified Watch List for VEOs and VEEs.

Evaluation:


The proposed corrective actions are deemed appropriate to address the condition documented in the CAR and provide reasonable assurance of precluding the likelihood of recurrence.

CAR CONTINUATION SHEET

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REJECTION

The results of the CAP evaluation indicate that the remedial actions and proposed corrective actions satisfactorily address the condition adverse to quality documented in CAR 18-057, and provide adequate measures for precluding recurrence. However, the response to the investigative actions (impact/extent) is incomplete. For this reason, the CAP for CAR 18-057 is rejected.

 FOR

Evaluation Performed By: Charles L. Riggs, CTAC

11-16-18

Date