

United States Government

JAN - 8 2019

 ENTERED
Department of Energy**memorandum**Carlsbad Field Office
Carlsbad, New Mexico 88221

DATE: JAN 08 2019

REPLY TO
ATTN OF: CBFO:OQA:MPN:JM:19-0103:UFC 2300.00SUBJECT: Re-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 re-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 attached CAR Continuation Sheets, the re-evaluation indicates that the revised CAPs are acceptable.

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



Martin P. Navarrete
Senior Quality Assurance Specialist

Attachment

190101



cc: w/attachment
R. Murray, EM *ED
T. Shrader, CBFO ED
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J. Kieling, NMED ED
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H. Tellez, CTAC ED
P. Hinojos, CTAC ED
J. Vernon, CTAC ED
G. White, CTAC ED
Site Documents ED
CBFO QA File
CBFO M&RC
*ED denotes electronic distribution

CAR CONTINUATION SHEET

1. CAR No: 18-051

2. Activity No: A-18-04

3. Page 1 of 2

Block #16 Acceptance of Proposed Corrective Actions:

An evaluation was performed of the Revised Corrective Action Plan (CAP) developed to address Carlsbad Field Office (CBFO) Corrective Action Report (CAR) 18-051. The revised CAP was submitted via Department of Energy (DOE), Idaho Operations Office letter CLN190392, dated December 13, 2018, from James A. Malmo, Assistant Manager, Waste Disposition Division, 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. Discussed with Operators the requirements of storing documents in a one-hour (min.) fire-rated file cabinet until transmittal to Records Management.*
- 2. Obtained one-hour (min.) fire-rated file cabinets.*
- 3. Records identified during audit were reviewed and placed in a one-hour (min.) fire-rated file cabinet pending transmittal to Records Management.*
- 4. 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 identified in the CAR.

INVESTIGATIVE ACTIONS

During a check of 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), Assay System Tamper Seal Verification (FRM-2061), it was determined forms were not properly stored in a one-hour (min.) fire-rated file cabinet or transmitted to Records Management in a timely manner. This issue is limited to WMF-634 Control Room where a walk around was completed to identify extent: no additional records were identified. There is no impact to the acceptability of any data generated prior to resolution of this deficiency as electronic records of these forms were available in the Waste Tracking System (WTS).

Evaluation:

The Investigative actions and the extent and impact described above are sufficient to address the condition adverse to quality identified in the CAR.

ROOT CAUSE DETERMINATION

Not required for this CAR.

ACTIONS TO PRECLUDE RECURRENCE

- 1. Assign trained Records Analyst/Records Coordinator to assist RWMC-AMWTP with the maintenance, protection storage and transmittal of records.*

CAR CONTINUATION SHEET

1. CAR No: 18-051	2. Activity No: A-18-04	3. Page 2 of 2
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Actionee: David Becker
Scheduled Completion Date: 12-18-18

2. *RWMC-AMWTP RTR and Assay Operators shall complete required read of MCP-557, Records Management and MCP-2064, Implementing Records Management Process.*

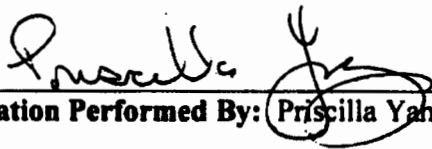
Actionee: David Becker
Schedule Completion Date: 12-18-18

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.

Acceptance

The results of the evaluated revised CAP indicate that the remedial actions, the investigative actions, and proposed corrective actions satisfactorily address the condition adverse to quality documented in CAR 18-051. Therefore, it is recommended that the CAP for CAR 18-051 be accepted.



Evaluation Performed By: Priscilla Yanez, CTAC

December 18, 2018
Date

CAR CONTINUATION SHEET

1. CAR No: 18-052	2. Activity No: A-18-04	3. Page 1 of 2
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Block #16 Acceptance of Proposed Corrective Actions:

A re-evaluation was performed of the Corrective Action Plan (CAP) developed to address Carlsbad Field Office (CBFO) Corrective Action Report (CAR) 18-052. The revised CAP was submitted via Department of Energy – Idaho Operations Office transmittal CLN190392, dated December 13, 2018, from James A. Malmo, Assistant Manager, Waste Disposition Division, to Mr. Martin P. Navarrete, Senior Quality Assurance Specialist, CBFO Quality Assurance.

Italicized text, taken verbatim from the revised CAP, is used to reflect the correlation between the actions required by the CAR and the method used for re-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. Extent of this issue is limited to M&TE assets in Maximo. There is no impact to acceptability of data as 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 cancelled in 2007 or earlier and two that were canceled in 2013. All 38 assets have been updated to reflect correct status in Maximo and no equipment removed from service was used after being in-activated.

CAR CONTINUATION SHEET

1. CAR No: 18-052	2. Activity No: A-18-04	3. Page 2 of 2
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Evaluation:

The investigative actions adequately describe the direct and/or contributing causes(s), as well as the extent and impact of the CAQ.

ROOT CAUSE DETERMINATION

Not required for this CAR.

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: N/A

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.

ACCEPTANCE

The results of the revised CAP evaluation indicate that the remedial actions, investigative actions and proposed corrective actions satisfactorily address the CAQ documented in CAR 18-052, and provide adequate measures for precluding recurrence.



Evaluation Performed By: Jim Vernon, CTAC

12-31-18
Date

CAR CONTINUATION SHEET

1. CAR No: 18-053

2. Activity No: A-18-04

3. Page 1 of 3

Block #16 Acceptance of Proposed Corrective Actions:

A re-evaluation was performed of the revised Corrective Action Plan (CAP) developed to address Carlsbad Field Office (CBFO) Corrective Action Report (CAR) 18-053. The revised CAP was submitted via Department of Energy (DOE), Idaho Operations Office letter CLN190392, dated December 13, 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

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: 12-18-18

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: 12-18-18

Evaluation:

The remedial actions described above are deemed appropriate to address the condition adverse to quality described in CAR 18-053.

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. For previously generated waste that already had a VE as CW-216, the new IDCs listed in RPT-TRUW-05 could be assigned by AKEs through an SDCR.

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.*

CAR CONTINUATION SHEET

1. CAR No: 18-053	2. Activity No: A-18-04	3. Page 2 of 3
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This issue is limited to the discontinued IDC CW-216 and there is no impact to the acceptability of the data. The containers assigned IDC CW-216 are tracked in WTS and will be re-assigned to an applicable new IDC prior to being presented to a waste stream profile.

After further investigation into whether the new proposed IDCs listed in RPT-TRUW-05 Rev 40 were equivalent to TRUCON codes it was determined to revise the IDCs and not to assign these at the time of VE until revision 42 was issued. Revision 42 of RPT-TRUW-05 effective 08/07/18, included the revised IDCs 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.*

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 presented in Revision 42 during VE.

Evaluation:

The investigative actions and extent of condition described above are deemed appropriate to address the condition adverse to quality identified in CAR 18-053.

ROOT CAUSE DETERMINATION

Not required for this CAR.

ACTIONS TO PRECLUDE RECURRENCE

- 1. Ensure that RPT-TRUW-05 is included in the VE Operator and VEE qualification job code to notify them when a new revision is issued and to complete the required reading.*

*Actionee: Lisa Frost
Scheduled Completion Date: 12/6/18*

- 2. Generate a Qualified Watch List for VE Operators and VEE's to ensure that all personnel are qualified and required reads are complete before being assigned to a task.*

*Actionee: Matt Hutson
Scheduled Completion Date: 12/6/18*

- 3. Update the VE procedures (TPR-7997) for the VEE to ensure visual examiners are trained and qualified to perform their responsibilities.*

*Actionee: Matt Hutson
Scheduled Completion Date: 12/18/18*

CAR CONTINUATION SHEET

1. CAR No: 18-053	2. Activity No: A-18-04	3. Page 3 of 3
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Evaluation:

The proposed corrective actions to preclude recurrence are deemed appropriate to address the condition adverse to quality documented in CAR 18-053 and provide reasonable assurance of precluding the likelihood of recurrence.

ACCEPTANCE

The results of the re-evaluation of the revised CAP indicate that the proposed remedial actions, the investigative actions, extent of condition, and the actions to prevent recurrence satisfactorily address the condition adverse to quality documented in CAR 18-053. Therefore, it is recommended that the revised CAP for CAR 18-053 be approved.

 FOR

Evaluation Performed By:
Randy Fitzgerald, CTAC

12-31-18

Date

CAR CONTINUATION SHEET

1. CAR No: 18-055	2. Activity No: A-18-04	3. Page 1 of 2
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Block #16 Acceptance of Proposed Corrective Actions:

An evaluation was performed of the revised Corrective Action Plan (CAP) developed to address Carlsbad Field Office (CBFO) Corrective Action Report (CAR) 18-055. The revised CAP was submitted via Department of Energy Idaho Operations Office (DOE ID) letter CLN190392, dated December 13, 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. Develop and provide tailgate training to RTR operators on recent changes to RPT-TRUW-05.*

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. This issue is limited to RTR characterization. There is no impact to data generated as the RTR operator had the correct version of RPT-TRUW-05 available in the control room.

Evaluation:

The investigative actions and the extent and impact described above are sufficient to address the condition adverse to quality identified in the CAR.

CAUSAL ANALYSIS

Not required for this CAR.

ACTIONS TO PRECLUDE RECURRENCE

- 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 field on the RTR analysis report so the current revision of the report can be documented.*

Actionee: Fluor IT-WTS

Scheduled Completion Date: 1/30/2019

CAR CONTINUATION SHEET

1. CAR No: 18-055	2. Activity No: A-18-04	3. Page 2 of 2
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2. *Ensure that RPT-TRUW-05 is included in the RTR Operator job code to notify them when a new revision is issued and to complete the required reading.*

Actionee: Lisa Frost


Scheduled Completion Date: 12/6/18

Evaluation:

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

ACCEPTANCE

The results of the evaluation of the revised CAP indicate that the remedial actions, the investigative actions, and proposed corrective actions satisfactorily address the condition adverse to quality documented in CAR 18-055. Therefore, it is recommended that the revised CAP for CAR 18-055 be accepted.



Evaluation Performed By: Dustin Stegman, CTAC

December 31, 2018

Date

CAR CONTINUATION SHEET

1. CAR No: 18-056

2. Activity No: A-18-04

3. Page 1 of 2

Block #16 Acceptance of Proposed Corrective Actions:

An evaluation was performed of the revised Corrective Action Plan (CAP) developed to address Carlsbad Field Office (CBFO) Corrective Action Report (CAR) 18-056. The revised CAP was submitted via Department of Energy Idaho Operations Office (DOE-ID) letter (CLN190392), dated December 13, 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 revised 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.*

Actionee: Matt Hutson

Scheduled Completion Date: 08/27/18

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. There is no impact to the acceptability of data generated as VE Experts are qualified and familiar with waste generating processes and all types of waste being characterized.

Evaluation:

The investigative actions adequately describe the degree of impact/extent of the condition beyond the specific condition listed in the CAR.

CAUSAL ANALYSIS

Not required for this CAR.

ACTIONS TO PRECLUDE RECURRENCE

- 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.*

Actionee: Matt Hutson

Scheduled Completion Date: 12/18/18

CAR CONTINUATION SHEET

1. CAR No: 18-056	2. Activity No: A-18-04	3. Page 2 of 2
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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.

Actionee: Matt Hutson

Scheduled Completion Date: 12/18/18

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.

Actionee: Matt Hutson

Scheduled Completion Date: 12/18/18

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.

Actionee: Matt Hutson

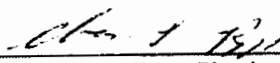
Scheduled Completion Date: 01/31/19

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.

Acceptance:

The results of the evaluation of the revised CAP indicate that the remedial actions, investigative actions, and actions to preclude recurrence satisfactorily address the condition adverse to quality documented in CAR 18-056. It is recommended that the revised CAP for CAR 18-056 be accepted.



Evaluation Performed By: Charles L. Riggs, CTAC

12/31/18
Date

CAR CONTINUATION SHEET

1. CAR No: 18-057

2. Activity No: A-18-04

3. Page 1 of 2

Block #16 Acceptance of Proposed Corrective Actions:

An evaluation was performed of the revised Corrective Action Plan (CAP) developed to address Carlsbad Field Office (CBFO) Corrective Action Report (CAR) 18-057. The revised CAP was submitted via Department of Energy Idaho Operations Office (DOE-ID) letter (CLN190392), dated December 13, 2018, from Mr. James A. Malmø, Assistant Manager, Waste Disposition Division, DOE-ID, to Mr. Martin Navarrete, Senior Quality Assurance Specialist, CBFO Quality Assurance.

Italicized text, taken verbatim from the revised 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.

Actionee: Matt Hutson

Scheduled Completion Date: 10/10/18

2. Operator read and signed RPT-TRUW-05 revision 42 immediately upon identification.

Actionee: Matt Hutson

Scheduled Completion Date: 8/29/18

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.

Confirmed previous revisions to RPT-TRUW-05 were signed by Visual Examiners prior to entering any VE data into WTS. No other containers have been affected; this is an isolated event.

Evaluation:

The investigative actions adequately describe the degree of impact/extent of the condition beyond the specific condition listed in the CAR.

CAUSAL ANALYSIS

Not required for this CAR.

CAR CONTINUATION SHEET

1. CAR No: 18-057	2. Activity No: A-18-04	3. Page 2 of 2
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ACTIONS TO PRECLUDE RECURRENCE

1. *Build Qualified Watch List for VEOs and VEEs.*

Actionee: *Matt Hutson*

Scheduled Completion Date: *12/3/18*

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.

Acceptance:

The results of the evaluation of the revised CAP indicate that the remedial actions, investigative actions, and actions to preclude recurrence satisfactorily address the condition adverse to quality documented in CAR 18-057. It is recommended that the revised CAP for CAR 18-057 be accepted.

Charles L. Riggs

Evaluation Performed By: Charles L. Riggs, CTAC

12/31/17

Date