



**Department of Energy**  
Carlsbad Field Office  
P. O. Box 3090  
Carlsbad, New Mexico 88221

 **ENTERED**

**JAN 08 2019**

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Veronica Ballew, Acting Manager  
Quality and Contractor Assurance  
Nuclear Waste Partnership LLC  
P.O. Box 2078  
Carlsbad, NM 88221-2078

**Subject:** Verification and Acceptance of Corrective Actions for CAR 18-029 from Audit A-18-14, Los Alamos National Laboratory Central Characterization Program Recertification, conducted May 8 - 10, 2018

Dear Mrs. Ballew:

Enclosed are the results of the Carlsbad Field Office (CBFO) evaluation and verification of documentation demonstrating completion of the corrective actions associated with CBFO Corrective Action Report (CAR) 18-029, which resulted from Audit A-18-14. The results of the verification are documented on the enclosed CAR Continuation Sheets, and indicate that the documentation of completion of corrective actions is acceptable.

The verification concluded that the associated corrective actions are acceptable. The CAR is considered closed.

If you have any questions regarding the CAR closure, please contact me at (575) 234-7491.

Sincerely,

Dennis S. Miehl  
Senior Quality Assurance Specialist

Enclosure



cc: w/enclosure  
 R. Murray, EM \*ED  
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 L. Bishop, EM-LA ED  
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 Site Documents ED  
 CBFO QA File  
 CBFO M&RC  
 \*ED denotes electronic distribution

### CAR CONTINUATION SHEET

1. CAR No: 18-029

2. Activity No: A-18-14

3. Page 1 of 3

#### **Block #17 & 18 Acceptance of Corrective Action Completion and Closure:**

The Carlsbad Field Office (CBFO) has reviewed the closure package for Corrective Action Report (CAR) 18-029, including objective evidence and supporting documentation, submitted via Nuclear Waste Partnership LLC (NWP) letter QA:18:00433 UFC:2300.00, dated December 27, 2018, from Ms. M. G. McDaniel, Manager, NWP Quality and Contractor Assurance, to Mr. D. S. Miehl, Senior Quality Assurance Specialist, CBFO Office of Quality Assurance.

*Italicized text, taken verbatim from the Corrective Action Plan (CAP), is used to reflect the correlation between the actions required by the CAR and the method used for evaluation.*

#### **REMEDIAL ACTIONS**

*A freeze-file was submitted on May 9, 2018, requesting a change in wording for CCP-TP-005, Section 4.2.17 clarifying the appropriate actions to take when a change to a procedure on the Interface Waste Management Documents List occurs, which does NOT affect waste stream management or packaging.*

#### **Verification:**

The objective evidence submitted in this closure package was reviewed and verified to meet the required remedial actions commitment. The evidence included a memo from Kevin Peters, Central Characterization Program (CCP) Acceptable Knowledge Expert (AKE), to Jessica Webb, TFE, dated May, 9, 2018, subject: "CCP-TP-005 Freeze File," with language to be revised in the next revision of the procedure that will revise problematic language [Attachment 1 to QA:18:00433].

#### **INVESTIGATIVE ACTIONS**

##### **Background:**

*An investigation into the circumstances regarding this CAR condition revealed that contrary to instructions provided in section 4.2.17 in CCP-TP-005, Acceptable Knowledge Experts (AKEs) have not been including the POCs/SMEs and verification date on the Acceptable Knowledge Document Summary form, when it was determined that the changes to a revision of a procedure currently listed on the Interface Waste Management Document List (IWMDL) did NOT affect waste stream management or packaging. The procedure requires that the POCs/SMEs and verification date are captured on the Acceptable Knowledge Document Summary form in all cases (i.e., when it has been determined that changes to a revision of a procedure currently listed on the IWMDL do or do not effect waste stream management and/or packaging).*

##### **Extent-of-Condition:**

*The extent-of-condition reviewed numerous Acceptable Knowledge Document Summary Forms (Attachment 3) from numerous waste streams from different sites. This review concluded that the sections of CCP-TP-005 lacked sufficient clarity to ensure that the steps were implemented consistently at all sites. The relevant information is always captured in the record as a part of the IWMDL, however, inclusion of the same information on the Attachment 3 was not always completed.*

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**Impact of the Condition:**

*The impact of the condition was determined to be negligible and not data quality affecting, since adding the POC/SME and verification date on the Acceptable Knowledge Document Summary form (Attachment 3) is redundant, since the POC/SME names and dates are both captured on the IWMDL that is submitted with the Attachment 3.*

**Verification:**

The investigative actions, including the impact and extent of condition, were evaluated and found to be acceptable, as documented in CBFO CAP acceptance memorandum CBFO:OQA:DSM:JM:18-1913:UFC 2300.00.

**CAUSAL ANALYSIS**

*Not required for this CAR.*

**ACTIONS TO PRECLUDE RECURRENCE**

*The following corrective actions will serve to address the most likely cause of this CAR condition; which was a lack of sufficient clarity in CCP-TP-005 on the appropriate steps to take when a change to a procedure does not impact waste management or packaging.*

1. *CCP Project Manager will send an email to AKEs re-iterating the importance of verbatim compliance to technical procedures and that the POC/SME and verification date are required on Acceptable Knowledge Document Summary forms when changes DO and DO NOT affect waste stream packaging and/or treatment until CCP-TP-005 is revised.*
2. *Revise CCP-TP-005, CCP Acceptable Knowledge, to correct and provide clear direction for when a change to a procedure requires the identification of POC/SME on the AK Source Document Summary.*

**COMMITMENTS**

*As a remedial action, submit a freeze-file to provide clarifying direction in CCP-TP-005.*

**DUE DATES**

*Completed*

*CCP Project Manager send an email to AKEs re-iterating the importance of verbatim compliance to technical procedures and that the POC/SME and verification date are required on Acceptable Knowledge Document Summary forms when changes DO and DO NOT affect waste stream packaging and/or treatment.*

*June 8, 2018*

*Revise CCP-TP-005, CCP Acceptable Knowledge.*

*August 16, 2018*

*Provide closure documentation to NWP Quality Assurance (QA).*

*August 30, 2018*

*NWP QA, transmit closure documentation to the CBFO.*

*September 7, 2018*

**CAR CONTINUATION SHEET**

1. CAR No: 18-029	2. Activity No: A-18-14	3. Page 3 of 3
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**Verification:**

Verified actions to preclude recurrence are acceptable through review of supporting documentation submitted in the CAR 18-029 closure package. The reviewed documentation included a memo from Daniel Wade, NWP, to all AKEs, dated June 8, 2018; IWMDLs and Attachment 3's addressing CAR 18-029; Attachment 2 to QA:18:00433; and "CCP Acceptable Knowledge Documentation." CCP-TP-005, Rev. 30, sec. 4.2.10 [J] (formerly included in section 4.2.17 of Rev. 29), was revised and the last sentence of section 4.2.17 stating, "Include the identification of the POCs/SMEs and verification date on the Acceptable Knowledge Source Document Summary form (see Section 4.3)" was deleted.

**CLOSURE ACCEPTANCE**

Based on the results of the review of the objective evidence included in the CAR 18-029 closure package, it is recommended that CAR 18-029 be closed.



Evaluation Performed By: Randy Fitzgerald, CTAC

1/3/19 Date