

United States Government

Department of Energy

memorandumCarlsbad Field Office
Carlsbad, New Mexico 88221

DATE: JAN 29 2019

REPLY TO
ATTN OF: CBFO:OQA:MPN:JM:19-0142:UFC 2300.00

SUBJECT: Acceptance of Closure Documentation for CAR 18-052 from Audit A-18-04, AMWTP
Recertification

TO: James A. Malmø, DOE-ID

The Carlsbad Field Office (CBFO) has completed its review and verification of completion of the corrective actions associated with CBFO Corrective Action Report (CAR) 18-052. The results of the verification are documented in the attached 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 concerning the CAR closure, contact me at (575) 234-7483.

Martin P. Navarrete
Senior Quality Assurance Specialist

Attachment

190116



cc: w/attachment	
R. Murray, EM	*ED
T. Shrader, CBFO	ED
K. Lachman, CBFO	ED
D. C. 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
M. McLean, NMED	ED
T. Runyon, CTAC	ED
P. Martinez, CTAC	ED
C. Castillo, CTAC	ED
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: 18-052

2. Activity No: A-18-04

3. Page 1 of 2

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) 18-052, including objective evidence and supporting documentation submitted via Department of Energy, Idaho Operations Office letter CLN190558, dated January 17, 2019, from Mr. James A. Malmø, Assistant Manager, Waste Disposition Division, to Mr. Martin Navarrete, Department of Energy, Carlsbad Field Office.

Italicized text, taken verbatim from the revised Corrective Action Plan (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.*
- 2. Update the Equipment List*

Evaluation:

The completion of Remedial Action 1 has been verified via review of Advanced Mixed Waste Treatment Project (AMWTP) Preventive Maintenance Justification (PMJ) PMJ-18-00009 initiated by Kevin Bake, System Engineer, on August 30, 2018. The completion of Remedial Action 2 has been verified via review of the corrected Equipment List which includes the correct designation of "RFS-Permanent."

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.

Evaluation:

The investigative actions, including the impact and extent of condition described in the revised CAP, were evaluated and found to be acceptable, as documented in CBFO memorandum CBFO:OQA:MPN:JM:19-0103:UFC 2300.00.

CAR CONTINUATION SHEET

1. CAR No: 18-052

2. Activity No: A-18-04

3. Page 2 of 2

CAUSAL ANALYSIS

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.

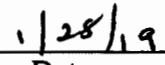
Evaluation:

Verified via review of TPR-7998, Revision 1, Step 4.8.6 does instruct the Computerized Maintenance Management System (CMMS) Administrator to "Update the CMMS to take M&TE out of service." Also verified that the 38 items have been removed from service on the Equipment List submitted in the CAR closure package. All commitments listed in the approved CAP have been verified to be complete.

ACCEPTANCE

Based on the results of the review and verification of the objective evidence included in the CAR 18-052 closure package, it is recommended that CAR 18-052 be closed.


Evaluation Performed By: B.J. Verret, CTAC


Date