

United States Government

FEB - 7 2019



memorandum

Carlsbad Field Office
Carlsbad, New Mexico 88221

DATE: FEB 07 2019

REPLY TO
ATTN OF: CBFO:OQA:MPN:JM:19-0156:UFC 2300.00SUBJECT: Acceptance of Closure Documentation for CBFO CARs 18-051 and 18-057 from Audit
A-18-04, AMWTP Recertification

TO: Mr. James A. Malmo, DOE-ID

The Carlsbad Field Office (CBFO) has completed its review and verification of completion of the corrective actions associated with CBFO Corrective Action Reports (CARs) 18-051 and 18-057. The results of the verification are documented in the attached CAR Continuation Sheets. The verification concluded that the associated corrective actions are acceptable. These CARs are considered closed.

If you have any questions regarding these CAR closures, please contact me at (575) 234-7483.

Martin P. Navarrete
Senior Quality Assurance Specialist

Attachment



cc: w/attachment

R. Murray, EM	ED
K. Lachman, CBFO	ED
D. C. Gadbury, 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
S. Poling, AMWTP	ED
R. Hubler, AMWTP	ED
G. Byram, AMWTP	ED
J. McCoy, AMWTP	ED
E. Gulbransen, AMWTP	ED
E. Dumas, AMWTP	ED
J. Floerke, 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
J. Vernon, CTAC	ED
B.J. Verret, CTAC	ED
P. Hinojos, 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 #17 & 18 Acceptance of Corrective Action Completion and Closure:

The Carlsbad Field Office (CBFO) has reviewed the closure package for Corrective Action Report (CAR) 18-051, including objective evidence and supporting documentation, submitted via Fluor Idaho letter CCN 323079, dated January 24, 2019, from Mr. John C. McCoy, Director, RH/CH TRU Programs, to Mr. James A. Malmo, Assistant Manager, Waste Disposition, Idaho Cleanup Project, U.S. Department of Energy, Idaho Operations Office (DOE-ID), with DOE-ID concurrence received February 4, 2019.

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. 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 completion of Remedial Action 1 has been verified via review of the Advanced Mixed Waste Treatment Project (AMWTP) Pre-Job Briefing Checklist performed August 28, 2018, and the Pre-Job Briefing Checklist performed September 5, 2018, both completed by Dave Becker. The completion of Remedial Action 2-4 has been verified via review of the Idaho Cleanup Project (ICP) Surveillance Report 124657. The Surveillance Report stated that a 1-hour fire-rated storage cabinet has been obtained, and the records identified during the audit were reviewed and transmitted to Records Management in accordance with MCP-557, *Records Management*, by the newly appointed records coordinator.

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, 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: 18-051

2. Activity No: A-18-04

3. Page 2 of 2

CAUSAL ANALYSIS

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.*

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 completion of Action to Preclude Recurrence 1 has been verified via review of the training and qualification documentation for Kasey Archer, the newly appointed Records Analyst/Records Coordinator. The completion of Action to Preclude Recurrence 2 has been verified by review of documentation of required reading of MCP-557, *Records Management*, and MCP 2064, *Implementing Records Management Process*, by the applicable RWMC-AMWTP RTR and Assay Operators.

ACCEPTANCE

Based on the results of the review and verification of the objective evidence included in the CAR 18-051 closure package, it is recommended that CAR 18-051 be closed.


Evaluation Performed By: Jim Vernon, CTAC

2-6-19
Date

CAR CONTINUATION SHEET

1. CAR No: 18-057

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) 18-057, including objective evidence and supporting documentation, submitted via Fluor Idaho letter CCN 323079, dated January 24, 2019, from Mr. John C. McCoy, Director, RH/CH TRU Programs, to Mr. James A. Malmo, Assistant Manager, Waste Disposition, Idaho Cleanup Project, U.S. Department of Energy, Idaho Operations Office (DOE-ID), with DOE-ID concurrence received February 4, 2019.

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. *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: 18/29/18

Evaluation:

The completion of Remedial Action 1 has been verified via review of Advanced Mixed Waste Treatment Project (AMWTP) Non-conformance Report 123083. The completion of Remedial Action 2 has been verified via review of documentation of the operator in question completing the required reading of RPT-TRUW-05, *Waste Matrix Code Reference Manual*, Revision 42.

INVESTIGATIVE ACTIONS

Investigative actions confirmed that Containers 10648006, 10647842, 10648011 and 10648010, from batch VEA18-00084 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, 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: 18-057

2. Activity No: A-18-04

3. Page 2 of 2

CAUSAL ANALYSIS

Not required for this CAR.

ACTIONS TO PRECLUDE RECURRENCE

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

Actionee: Matt Hutson

Scheduled Completion Date: 12/3/18

Evaluation:

The completion of Action to Preclude Recurrence 1 has been verified via review of the Site Training Qualified Watch List: RWMC VE QWL.

ACCEPTANCE

Based on the results of the review and verification of the objective evidence included in the CAR 18-057 closure package, it is recommended that CAR 18-057 be closed.



Evaluation Performed By: Jim Vernon, CTAC

2-6-19
Date