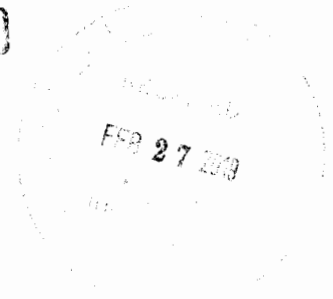




**Department of Energy**

Carlsbad Field Office  
P. O. Box 3090  
Carlsbad, New Mexico 88221

**FEB 27 2019**



Mr. Dennis Ivey, Manager  
Quality and Contractor Assurance  
Nuclear Waste Partnership LLC  
P.O. Box 2078  
Carlsbad, NM 88221-2078

Subject: Verification and Rejection of Corrective Actions for CAR 18-046 from Audit A-18-17, Argonne National Laboratory, Nuclear Waste Partnership LLC, Central Characterization Program

Dear Mr. Ivey:

The Carlsbad Field Office (CBFO) had performed an evaluation and verification of documentation demonstrating completion of the corrective actions associated with CBFO Corrective Action Report (CAR) 18-046, which resulted from Audit A-18-17 conducted July 31 – August 2, 2108. The results of the verification are documented in the enclosed CAR Continuation Sheets, and indicate that the documentation of completion of corrective actions is not acceptable.

The verification concluded that the commitments associated with the actions to preclude recurrence have not been completed; therefore, the CAR remains open. Please make the necessary changes and resubmit the closure package by March 29, 2019.

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

Sincerely,

Martin P. Navarrete  
Senior Quality Assurance Specialist

Enclosure



Mr. Ivey

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cc: w/enclosure

R. Murray, EM	*ED
T. Shrader, CBFO	ED
K. Lachman, CBFO	ED
D. C. Gadbury, CBFO	ED
C. Fesmire, CBFO	ED
D. Miehl, CBFO	ED
M. Stapleton, CBFO	ED
N. Castaneda, CBFO	ED
T. Carver, CBFO	ED
D. Misch, DOE-CH	ED
K. Joshi, DOE-CH	ED
B. Covert, NWP	ED
S. Strong, NWP	ED
M. Percy, NWP	ED
R. Lee, NWP/CCP	ED
R. Reeves, NWP/CCP	ED
R. Kantrowitz, NWP/CCP	ED
C. Simmons, NWP/CCP	ED
J. Harvill, NWP/CCP	ED
J. Carter, NWP/CCP	ED
V. Ballew, NWP/QA	ED
S. Saiz, NWP/QA	ED
A. Boyea, NWP/QA	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
P. Martinez, CTAC	ED
H. Tellez, CTAC	ED
C. Castillo, CTAC	ED
J. Vernon, CTAC	ED
K. Gentry, 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: 18-046	2. Activity No: A-18-17	3. Page 1 of 3
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#### **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) 18-046, including objective evidence and supporting documentation, submitted via Nuclear Waste Partnership (NWP) letter QA 19:00059, dated February 12, 2019, from Mr. Dennis Ivey, Manager, Quality and Contractor Assurance, to Mr. Martin P. Navarrete, 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**

*The CIS Cover Page was annotated, to note that the signature and date of the AKE is not procedurally required. The "Draft" entries for the AKE signature and date were struck from the CIS Cover Page form.*

#### **Verification:**

The completion of the remedial actions was exhibited in the closure documentation submitted by NWP letter QA 19:00059. The closure package included the corrected Central Characterization Program (CCP) Characterization Information Summary (CIS) Cover Page for Waste Stream AERHDM, Revision 1. The AK Expert Review and Date that previously stated "Draft" has been revised to "N/A," with a note stating that the AK Expert Review is not required per the procedure.

#### **INVESTIGATIVE ACTIONS**

##### **Background**

*The CIS Cover Page identified in the CAR condition, was included in the transmittal of the Waste Stream Profile Form for waste stream AERHDM on November 5, 2013." It was this submittal that included the CIS Cover Page that was noted as "Draft" for both the AKE review and date.*

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

*An extensive review of all remote-handled (RH) WSPFs was conducted on August 9, 2018. This review included 23 WSPFs. As a result, there were no other instances identified indicating that this condition is isolated to the WSPF for AERHDM.*

##### **Impact of Condition:**

*The extent of condition revealed that it is isolated to Revision 1 of the WSPF for waste stream AERHDM and ANL. The information presented in the WSPF for AERHDM remains credible and no change to this information is necessary as a result of the CAR condition. Accordingly, the impact of the condition in this CAR is determined to be negligible.*

**CAR CONTINUATION SHEET**

<b>1. CAR No:</b> 18-046	<b>2. Activity No:</b> A-18-17	<b>3. Page 2 of 3</b>
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**Cause of the Condition:**

*The investigation results could not specifically conclude the direct cause for the CAR condition. The AKE involved in the review and concurrence of the WSPF, could not recall why "Draft" had been noted initially on the CIS Cover Page, since the condition has existed since August 2013 (nearly 5 years). CCP-TP-002 does not require that the AKE sign the CIS Cover Page. Additionally; it would appear that an oversight occurred, wherein the WSPF package (quality record/document) should not have been submitted to records lacking the signature and date of the AKE where indicated on the CIS Cover Page, or annotated as "N/A" on the signature line.*

**Verification:**

The investigative actions, including the impact and extent of condition described in the CAP, were evaluated and found to be acceptable, as documented in CBFO memorandum CBFO:OQA:MPN:JM:18-2025:UFC 2300.00.

**CAUSAL ANALYSIS**

*Not required for this CAR.*

**ACTIONS TO PRECLUDE RECURRENCE**

*Revise CCP-TP-002 (Attachment 2, Waste Stream Profile Form and Attachment 3, CIS Cover Page)*

**COMMITMENTS**

**DUE DATES**

*Correct the CIS Cover Page in the WSPF package and resubmit to CCP Records*

*Complete*

*Revise CCP-TP-002 (Attachment 2, Waste Stream Profile Form and Attachment 3, CIS Cover Page)*

*January 25, 2019*

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

*February 8, 2019*

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

*February 15, 2019*

**Verification:**

Completion of actions to preclude recurrence was exhibited in the closure documentation submitted by NWP letter QA 19:00059. The closure documentation included the corrected CIS Cover Page, and a revision to CCP-TP-002. CCP-TP-002, *CCP Reconciliation of DQOs and Reporting Characterization Data*, Revision 28, was approved February 11, 2019. The procedure was revised to address CAR 18-046, identified during CBFO Audit A-18-17, by updating the AK Expert (AKE) responsibility section, adding a procedural step directing the AKE to sign the Waste Stream Profile Form (WSPF), as well as revising Attachment 2, CCP Reconciliation with Data Quality Objective (Example), and Attachment 4, CCP Correlation of Container Identification Number to Batch Data Report Numbers (Example). Attachment 3, CCP Characterization Information Summary Cover Page (Example), has not been revised as described on the commitments associated with the actions to preclude recurrence.

**CAR CONTINUATION SHEET**

1. CAR No: 18-046	2. Activity No: A-18-17	3. Page 3 of 3
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**VERIFICATION: NOT ACCEPTABLE**

Based on the results of the review and verification of the objective evidence included in the CAR 18-046 closure package, it is recommended that the closure be not accepted. The action to preclude recurrence, specifically the commitment to revise the Attachment 3 of CCP-TP-002, has not occurred.



Evaluation Performed By: Jim Vernon, CTAC

2-25-19

Date