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Carlsbad Programs Group
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April 2, 2019

Mr. Dennis S. Miehls, Senior Quality Assurance Specialist
U.S. Department of Energy
Carlsbad Field Office
P.O. Box 3090
Carlsbad, NM 88221

Subject: Corrective Action Documentation for CBFO CARs 19-037, 19-038, and 19-039 from CBFO Audit A-19-23

Dear Mr. Miehls:

Attached please find SNL's corrective actions to CBFO CARs 19-037, 19-038, and 19-039. The corrective actions are scheduled to be completed 6/15/19, 4/15/19, and 4/15/19 respectively. A notification will be sent when the corrective actions are ready for verification. If you have any questions concerning the proposed corrective actions, please contact Shelly R. Nielsen, QA Team Lead, at 628-0199.

Sincerely,

Paul E. Shoemaker

Copy to:
C. Gadbury, CBFO
D. Miehls, CBFO
S. Davis, SNL
S. Nielsen, SNL
A. Guerin, SNL
Department 8880 Day File

190401



Proposed Correction Action for CBFO CAR 19-037 from CBFO Audit A-19-23

Remedial Actions: examine the 30 open Laboratory and Field Scientific Notebooks (SN) for the six-month review cycles.

Investigative Actions: a physical examination of the open notebooks was initiated to determine if the Technical and QA six-month reviews occurred. The following Laboratory Notebooks were identified as missing their six-month review cycle: WIPP-FePbS-1, WIPP-Borate-10, and WIPP-Mineral Fragments-11. The following Field Notebooks were identified as missing their six-month review cycle: WIPP-SSW-3 and WSWT #19. See Table below for additional information.

Scientific Notebook Title	Due for Review	Reviewed	Impact
WIPP-FePbS-1	6/2018	3/21/19 (tech) 3/27/19 (QA)	No impact, 8 pages to review which contained directions from the PI, solution prep, and ICP analysis. No major issues identified.
WIPP-Borate-10	11/2018	Review scheduled 3/30/19	No impact, pages that need reviewed contain XRD images.
WIPP-Mineral Fragments-11	1/2019	3/5/19 (tech) 3/7/19 (QA)	No impact, was 2 months out of review cycle and no major issues were identified.
WIPP-SSW-3	10/2018	2/28/19 (tech) QA scheduled 3/30/19	No impact, this SN contains quarterly shallow well downloads, there were no major issues identified
WSWT #19	1/2019	Review scheduled 3/30/19	No impact, is almost 3 months out of review cycle, pages that need reviewed contain documentation on 3 wells requiring maintenance.

Actions to Preclude Recurrence: will remind SN owners one month prior to the six-month review due date

Responsible Individual(s): Shelly R. Nielsen

Estimated Completion Date: 6/15/19

Proposed Correction Action for CBFO CAR 19-038 from CBFO Audit A-19-23

Remedial Action: According to procedure NP 17-1, Revision 9, "Records", Machine Readable Media forms and associated CDs are considered non-QA; therefore, the records will not be corrected.

Investigative Actions: Reviewed CDs from July 2018 to present in "WIPP Well Video Logs" (package ERMS 543016).

Results: Out of the 10 CDs that were submitted from July 2018 to present, half did not have the same information on the CDs that was provided on the form, but there was enough information on the CD to associate it to its corresponding form. In addition, the ERMS # (the records identifier) is written on both the CD and the form; therefore, easier to associate to each other. There is no impact.

Actions to Preclude Recurrence: An email was sent on March 25, 2019 to the staff reminding them of the importance of having all the information that is provided on form NP 17-1-1, "Machine Readable Media" be on the CD.

Responsible Person: Grace Duran

Estimated Completion Date: April 15, 2019

Proposed Correction Action for CBFO CAR 19-039 from CBFO Audit A-19-23

Remedial Action: Review procedure SP 17-1, “Records Center Operations”.

Investigative Actions: Upon the review of procedure SP 17-1, “Records Center Operations”, Section 2.1.5, Note, states that the Retention Inventory and Disposition (RIDS) Schedule has been approved by the DOE/CBFO. This statement is no longer correct as the DOE/CBFO transferred the RIDS approval to the Records Officer. Therefore, SP 17-1 requires a revision to correctly identify how the RIDS is approved annually. In addition, Retention Inventory and Disposition Schedule has been changed to Records Inventory and Disposition Schedule.

A Records Staff member did not attend the two workshops required under procedure WP 15-RM3002 to maintain her Records Coordinator status; however, did attend one workshop. The Record Staff member was unable to attend one more workshop due to the departure of a Records Staff member and training of the new member. However, the Records Staff member was still current with the self-paced module ADM-105 when the RIDS was revised in December 2018.

Actions to Preclude Recurrence: Both Records Staff members passed the ADM-105 test on March 28, 2019 and will attend the two required workshops that will be provided by TFE Records staff.

Responsible Person: Grace Duran

Estimated Completion Date: April 15, 2019