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United States Government

memorandum

CARLSBAD FIELD OFFICE
Carlsbad, New Mexico 88221

DATE:   MAY 09 2019

REPLY TO ATTN OF:  CBFO:OQA:MPN:JM:19-0887:UFC 2300.00

SUBJECT:  Acceptance of Closure Documentation for CBFO CAR 18-055 from Audit A-18-04, AMWTP Recertification

TO:   James A. Malmo, Dept. of Energy - Idaho

The Carlsbad Field Office (CBFO) has completed its review and verification of completion of the corrective actions associated with CBFO Corrective Action Reports (CAR) 18-055. The results of the verification are documented in the attached CAR Continuation Sheet, and indicate that the documentation of completion of corrective actions is acceptable. The CAR is considered closed.

If you have any questions concerning CAR 18-055, please contact me at (575) 234-7483.

Attachment

cc: w/attachment
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*ED denotes electronic distribution

Martin P. Navarrete
Senior Quality Assurance Specialist

190506
Block #17 & 18 Acceptance of Proposed Corrective Actions:

The Carlsbad Field Office (CBFO) has reviewed the closure package for Corrective Action Report (CAR) 18-055, including objective evidence and supporting documentation, submitted via Department of Energy Idaho Operations Office (DOE ID) letter CCN323532, dated May 2, 2019, from Mr. James A. Malmo, Assistant Manager, Waste Disposition Division, DOE ID, to Mr. Martin Navarrete, Senior Quality Assurance Specialist, CBFO Office of Quality Assurance.

Italicized text, taken verbatim from the CAP, is used to reflect the correlation between the actions required by the CAR and the method used for evaluation.

**REMEDIAL ACTIONS**

1. Develop and provide tailgate training to RTR operators on recent changes to RPT-TRUW-05.

**Verification:**

The objective evidence submitted in this closure package was reviewed and verified to meet the required remedial actions commitment. The evidence included Required Reading and attendance roster for real-time radiography (RTR) tailgate training on recent changes to RPT-TRUW-05.

**INVESTIGATIVE ACTIONS**

During the review of RTR operations in WMF-634 on 8/28/18, the RTR operator had the correct version of RPT-TRUW-05 available in the control room, and showed the auditor the process for verifying the correct revision using EDMS. The revision of RPT-TRUW-05 is not documented in our current RTR process, but is used as a reference document to verify that the physical form of the waste is consistent. Results of the RTR inspection are documented in WTS. This issue is limited to RTR characterization. There is no impact to data generated as the RTR operator had the correct version of RPT-TRUW-05 available in the control room.

**Verification:**

Investigative actions were evaluated and found to be acceptable, as documented in CBFO CAP acceptance memorandum CBFO:OQA:MPN:JM:19-0103:UFC 2300.00.

**ROOT CAUSE DETERMINATION**

Not required for this CAR.

**ACTIONS TO PRECLUDE RECURRENCE**

1. It is understood that RPT-TRUW-05 is a necessary document that supports the RTR process in the characterization of waste containers. SCR-5120 was generated on 8/30/18 to add RPT-TRUW-05 as a document field on the RTR analysis report so the current revision of the report can be documented.

**Actionee:** Fluor IT-WTS

**Scheduled Completion Date:** 1/30/2019
2. Ensure that RPT-TRUW-05 is included in the RTR Operator job code to notify them when a new revision is issued and to complete the required reading.

**Actionee:** Lisa Frost  
**Scheduled Completion Date:** 12/6/18

**Verification:**  
Verified actions to preclude recurrence are acceptable through review of supporting documentation submitted in the CAR 18-055 closure package. The reviewed documentation included SCR-5120, which added rows to the procedure revision and columns to various tables, in order to store procedure revision IDs for each analysis type on the RTR analysis report. Also reviewed were examples of RTR analysis reports that reflect the required report revision.

**Closure Acceptance**  
Based on the results of the review of the objective evidence included in the CAR 18-055 closure package, it is recommended that CAR 18-055 be closed.

_Evaluation Performed By:_ Dustin Stegman, CTAC  
_Date:_ 5-6-19