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Department of Energy
Carlsbad Field Office
P. O. Box 3090
Carlsbad, New Mexico 88221
JUN 06 2019



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

Subject: Evaluation of the CAP for CBFO CAR 19-046 Resulting from CBFO
Audit A-19-16

Dear Mr. Ivey:

The Carlsbad Field Office (CBFO) has completed its evaluation of the Corrective Action Plan (CAP) associated with CBFO Corrective Action Report (CAR) 19-046. As documented in the enclosed CAR Continuation Sheet, the evaluation indicates that the CAP is acceptable.

If you have any questions concerning the evaluation, please contact me at (575) 234-7483.

Sincerely,

 FOR
Martin P. Navarrete
Senior Quality Assurance Specialist

Enclosure



cc: w/enclosure
R. Murray, EM *ED
D. C. Gadbury, CBFO ED
C. Fesmire, CBFO ED
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T. Boswell, 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

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Block #16 Acceptance of Proposed Corrective Actions:

An evaluation was performed of the Corrective Action Plan (CAP) developed to address Carlsbad Field Office (CBFO) Corrective Action Report (CAR) 19-046. The CAP was submitted via Nuclear Waste Partnership LLC (NWP) letter QA:19:00210 UFC:2300.00, dated May 28, 2019, from Mr. Dennis. Ivey, Manager, NWP Quality Assurance, to Mr. M. P. 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

Due to the two VEO requirement of CCP-TP-113, the direction stated in CCP-PO-001 for each VEO to observe for themselves continues to be met; therefore, no remedial actions are necessary

Evaluation:

No remedial actions were necessary to address the condition adverse to quality identified in the CAR. This is acceptable.

INVESTIGATIVE ACTIONS

A review of CCP-TP-113, Rev. 22 was conducted to examine the adequacy of the performance of visual examination (VE) relative to CCP-PO-001, Revision 23, CCP TRU Waste Characterization Quality Assurance Project Plan, Section C1-2, Visual Examination, second paragraph, "When VE is performed using a second operator, each operator performing the VE will observe for themselves the waste being placed in the waste container or the contents within the examined waste container when waste is not removed."

The results of the review found that CCP-TP-113 requires two operators to perform VE. As stated in Section 1.1, "This procedure requires two Visual Examination Operators (VEO) to perform the VE process." This is further indicated by requiring two operator signatures on the Attachments 1-3, indicating the two VE operators have performed the applicable steps.

Due to the two VEO requirement of CCP-TP-113, the direction stated in CCP-PO-001 for each VEO to observe for themselves continues to be met.

Revision 22 of CCP-TP-113 implemented a single method for performing VE which requires two operators. Method 1 was removed due to non-use and for clarification of the procedure. The removal of Method 1 caused Method 2 to become redundant, therefore, was also removed. The removal of Method 2 (which contained the reference to CCP-PO-001, Section C1-2) inadvertently caused the removal of the statement.

CCP-TP-113 will be revised to include the CCP-PO-001, Section C1.2 statement.

CAR CONTINUATION SHEET

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Evaluation:

The investigative actions described above are deemed appropriate to address the condition adverse to quality identified in the CAR.

CAUSAL ANALYSIS

Not required for this CAR.

ACTIONS TO PRECLUDE RECURRENCE

CCP-TP-113 will be revised to include the CCP-PO-001, Section C1.2 statement.

COMMITMENTS

DUE DATES

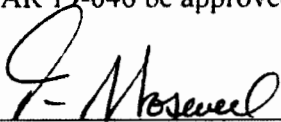
<i>Revise CCP-TP-113 to include the CCP-PO-001, Section C1.2 statement.</i>	August 8, 2019
<i>Provide Closure documentation to NWP Quality Assurance (QA)</i>	August 15, 2019
<i>NWP QA, transmit closure documentation to the CBFO</i>	August 22, 2019

Evaluation:

The proposed corrective actions are deemed appropriate to address the condition documented in the CAR and provide reasonable assurance of precluding the likelihood of recurrence.

ACCEPTANCE

The results of the evaluation of the CAP indicate that the remedial actions, investigative actions, and proposed corrective actions satisfactorily address the condition adverse to quality documented in CAR 19-046, and provide adequate measures for precluding recurrence. Therefore, it is recommended that the CAP for CAR 19-046 be approved.



Evaluation Performed By: Tim Boswell, CTAC

6/5/19

Date