

 ENTERED



**Department of Energy**

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

**JUN 11 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 CAPs for CBFO CARs 19-042, 19-043 and 19-044 Resulting from CBFO Audit A-19-16

Dear Mr. Ivey:

The Carlsbad Field Office (CBFO) has completed its evaluation of the Corrective Action Plans (CAPs) associated with CBFO Corrective Action Reports (CARs) 19-042, 19-043 and 19-044. As documented in the enclosed CAR Continuation Sheets, the evaluations indicate that these CAPs are rejected.

The revised CAPs for these CARs are due to CBFO QA by June 24, 2019.

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

Sincerely,



Martin P. Navarrete  
Senior Quality Assurance Specialist

Enclosure



cc: w/enclosure

R. Murray, EM \*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  
L. Wilkerson, DOE-OR ED  
B. Covert, NWP ED  
S. Strong, NWP ED  
M. Percy, NWP ED  
R. Lee, NWP ED  
R. Reeves, NWP ED  
C. Simmons, NWP ED  
R. Martin, NWP ED  
J. Knox, NWP ED  
J. Carter, NWP ED  
D. Matheny, NWP ED  
J. Harrison, NWP ED  
S. Reavis, NWP ED  
P. Tillman, NWP ED  
S. Saiz, NWP ED  
V. Ballew, NWP ED  
A. Boyea, NWP ED

J. Walsh, EPA ED  
J. Ellis, EPA ED  
T. Peake, EPA ED  
E. Felcorn, EPA ED  
J. Kieling, NMED ED  
R. Maestas, NMED ED  
D. Biswell, NMED ED  
M. McLean, NMED ED  
J. Dawson, Trinity Eng. ED  
T. Runyon, CTAC ED  
P. Martinez, CTAC ED  
C. Castillo, CTAC ED  
H. Tellez, CTAC ED  
K. Gentry, CTAC ED  
D. Blauvelt, CTAC ED  
R. Fitzgerald, CTAC ED  
R. Chavez, 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) 19-042. The CAP was submitted via Nuclear Waste Partnership LLC (NWP) letter QA:19:00205 UFC:2300.00, dated May 23, 2019, from Mr. D. 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**

*The CCP Technical Support Manager issued a suspension of work to Acceptable Knowledge Expert (AKE) personnel for procedure CCP-TP-005, CCP Acceptable Knowledge Documentation, Rev. 30, Step 4.2.10 on 5/13/2019. This suspension is only applied to the development of Interface Waste Management Documents Lists (IWMDL).*

**Evaluation:**

**Accepted.**

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

**INVESTIGATIVE ACTIONS**

*A review was performed of all the IWMDLs issued under Rev. 30 of CCP-TP-005. It was found that while the procedure could not have been followed with verbatim compliance as required, all the IWMDLs were generated with the required information in Section 4.2.10 and therefore have been determined to be technically compliant.*

*There is no technical impact as the IWMDLs were generated with all of the required information specified by CCP-TP-005 Rev. 30.*

**Evaluation:**

**Not Accepted.**

Although the CAP states "a review was performed of all the IWMDLs issued under Rev. 30 of CCP-TP-005," it is not clear if the review included all CCP sites, or was limited to ORNL/CCP. Therefore, the investigative actions do not adequately describe the extent beyond the original sample size.

**CAUSAL ANALYSIS**

*Not required for this CAR.*

**ACTIONS TO PRECLUDE RECURRENCE**

- *Review CCP-TP-005, CCP Acceptable Knowledge Documentation, for additional incorrect references and revise the procedure as applicable. Note: Implementation of this procedure releases the stop work associated with Step 4.2.10.*

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- Complete Required Reading of CCP-TP-005, Rev. 31 by AKEs.
- Develop and disseminate a CCP Lessons Learned on procedure development and review.

**COMMITMENTS**

**DUE DATES**

<i>Suspension of work for Section 4.2.10 of CCP-TP-005 Rev. 30 sent by Technical Services Manager to AKE Personnel.</i>	Complete
<i>Review of CCP-TP-005, CCP Acceptable Knowledge Documentation for additional incorrect references and revise the procedure as applicable.</i>	June 6, 2019
<i>Complete Required Reading and CCP-TP-005, Rev. 31 by AKEs.</i>	June 20, 2019
<i>Develop and disseminate a CCP Lessons Learned on procedure development and review.</i>	June 20, 2019
<i>Provide closure documentation to NWP Quality Assurance (QA).</i>	June 27, 2019
<i>NWP QA, transmit closure documentation to the CBFO</i>	July 11, 2019

**Evaluation:**

**Not Accepted.**

The actions to preclude recurrence do not provide an effective method for ensuring that conditions adverse to quality identified in a CAR are communicated to Acceptable Knowledge Experts (AKEs). There have been two recent instances, i.e., CAP for CBFO CAR 19-042 and CAP for CBFO CAR 18-029, where an email emphasizing verbatim procedure compliance was sent by the CCP Technical Support Manager to AKEs, but the same condition was later identified during an audit of Acceptable Knowledge (AK) activities.

**CAP for CBFO CAR 19-042**

The CAP for this CAR (19-042) included as a Remedial Action, "The CCP Technical Support Manager issued a suspension of work to Acceptable Knowledge Expert (AKE) personnel for procedure CCP-TP-005, CCP Acceptable Knowledge Documentation, Rev. 30, Step 4.2.10 on 5/13/2019. This suspension is only applied to the development of Interface Waste Management Documents Lists (IWMDL)." However, per CCP-TP-005, step 4.2.10[G], three AK Source Document Summary forms (Attachment 3) for LANL IWMDL documents were signed (i.e., P394 on 5/21/19; P384 on 5/21/19; and D058 on 5/17/19) after the suspension of work on 5/13/2019. CCP-TP-005, Rev. 30, section/step 4.2.10, states: "Collect information identified in the following steps for development of the Attachment 9, Interface Waste Management Documents List." (Section 4.2.10 includes steps [A] – [K].)

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1. CAR No: 19-042	2. Activity No: A-19-16	3. Page 3 of 3
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**CAP for CBFO CAR 18-029**

The CBFO CAR 18-029 from A-18-14 involved the verbatim compliance of CCP-TP-005, Rev. 29, section/step 4.2.17 (listing Points of Contact/Subject Matter Experts on Attachment 3s summarizing IWMDL documents). The remedial actions included an email sent from the CCP Technical Support Manager to the AKEs about the importance of verbatim compliance. However, after the CAR was issued and the email from CCP Technical Support Manager was sent, the same condition was identified at the CCP/ORNL Audit A-19-16 (see CAR 19-044).

Based on the two instances where a directive email from the CCP Technical Support Manager to the AKEs was not effective, an efficient communication method should be established in lieu of an email. The proposed corrective actions are not deemed appropriate to address the condition documented in the CAR, and do not provide reasonable assurance of precluding the likelihood of recurrence.

**REJECTION**

The results of the CAP evaluation indicate that the remedial actions satisfactorily address the condition adverse to quality documented in CAR 19-042. However, the response to the investigative actions (extent), and proposed corrective actions to preclude recurrence are less than adequate. For these reasons, the CAP for CAR 19-042 is rejected. Any indications resulting from the investigative actions (extent and impact results) suggesting that further corrective actions may be needed should be addressed in the actions to preclude recurrence portion of the revised CAP.

Katie Gentry for  
Evaluation Performed By: Randy Fitzgerald, CTAC

6-11-19  
Date

### CAR CONTINUATION SHEET

1. CAR No: 19-043	2. Activity No: A-19-16	3. Page 1 of 2
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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) 19-043. The CAP was submitted via Nuclear Waste Partnership LLC (NWP) letter QA:19:00205 UFC:2300.00, dated May 23, 2019, from Mr. D. 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**

*The discrepant Interface Waste Management Documents Lists (IWMDL) Attachment 3 – Acceptable Knowledge Source Document Summary documents discovered during the audit were corrected.*

#### **Evaluation:**

##### **Accepted.**

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

#### **INVESTIGATIVE ACTIONS**

*All Interface Waste Management Documents Lists (IWMDL) Attachment 3 – Acceptable Knowledge Source Document Summary generated since the issue of CCP-TP-005, Rev. 30 on 12/21/2018 were reviewed to verify:*

- *If the Attachment 3 identified whether the changes to the procedure revision affected waste stream management or packing.*
- *If the Attachment 3 did not contain this statement, the AKE re-evaluated the procedure to determine if a revision to the IWMDL was needed.*

*Each Attachment 3 was reviewed and it was found that no additional discrepancies/errors were made with regard to section 4.2.10[J] of CCP-TP-005 Rev. 30 (i.e., when changes did not affect waste stream management or packaging, then the attachment captured that there were no relevant changes to waste management from the previous revisions(s)).*

*There has been no technical impact because the changes made to the IWMDL were not relevant to waste management and packaging.*

#### **Evaluation:**

##### **Not Accepted.**

Although the CAP states “All Interface Waste Management Documents Lists (IWMDL) Attachment 3 – Acceptable Knowledge Source Document Summary generated since the issue of CCP-TP-005, Rev. 30 on 12/21/2018 were reviewed...,” it is not clear if the review included all CCP sites, or was limited to ORNL/CCP. Therefore, the investigative actions do not adequately describe the extent beyond the original sample size.

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**CAUSAL ANALYSIS**

*Not required for this CAR.*

**ACTIONS TO PRECLUDE RECURRENCE**

*Develop a briefing on verbatim procedural compliance for CCP personnel.*

*Perform a Management Self-Assessment (MSA) on procedure compliance.*

**COMMITMENTS**

**DUE DATES**

*Issue briefing on verbatim procedural compliance.*

*May 30, 2019*

*Complete MSA*

*August 22, 2019*

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

*September 5, 2019*

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

*September 19, 2019*

**Evaluation:**

**Accepted.**

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.

**REJECTION**

The results of the CAP evaluation indicate that remedial actions and proposed corrective actions satisfactorily address the condition adverse to quality documented in CAR 19-043, and provide adequate measures for precluding recurrence. However, the investigative actions (extent) are less than adequate. For this reason, the CAP for CAR 19-043 is rejected. Any indications resulting from the investigative actions (extent and impact) suggesting that further corrective actions may be needed should be addressed in the actions to preclude recurrence portion of the revised CAP.

*Katie Gentry for*  
Evaluation Performed By: Randy Fitzgerald, CTAC

*6-11-19*  
Date

### CAR CONTINUATION SHEET

1. CAR No: 19-044	2. Activity No: A-19-16	3. Page 1 of 3
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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) 19-044. The CAP was submitted via Nuclear Waste Partnership LLC (NWP) letter QA:19:00205 UFC:2300.00, dated May 23, 2019, from Mr. D. 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**

*The discrepant Interface Waste Management Documents Lists (IWMDL) Attachment 3 – Acceptable Knowledge Source Document Summary documents discovered during the audit were corrected.*

*The CCP Technical Support Manager issued an advisory email to Acceptable Knowledge Expert (AKE) personnel that verbatim procedural compliance is required per CCP-PO-005, CCP Conduct of Operations on 5/13/2019. The condition noted within CAR 19-044 was discussed within the email.*

#### **Evaluation:**

#### **Not Accepted.**

The condition noted in CAR 19-044 (listing Points of Contact/Subject Matter Experts [POCs/SMEs] on Attachment 3s for IWMDL documents) was **not** discussed in the 5/13/2019 advisory email sent from the CCP Technical Support Manager to the AKE personnel. The 5/13/2019 email addressed “incorrect references” in CCP-TP-005, Rev. 30, identified in CAR 19-042.

The remedial actions described above are not deemed appropriate to address the condition adverse to quality identified in the CAR.

#### **INVESTIGATIVE ACTIONS**

*All Interface Waste Management Documents Lists (IWMDL) Attachment 3 – Acceptable Knowledge Source Document Summary generated from May 15, 2018 through December 21, 2018 were reviewed to verify that the POCs/SMEs and verification date were included.*

*Each Attachment 3 was reviewed and it was found that no additional discrepancies/errors were made with regard to section 4.2.17 of CCP-TP-005 Rev. 29 (i.e., all Attachment 3's identified POCs/SMEs and the verification date as procedurally required).*

*There has been no technical impact because changes made to the IWMDL were not relevant to waste management and packaging.*

#### **Evaluation:**

#### **Not Accepted.**

Although the CAP states “All Interface Waste Management Documents Lists (IWMDL) Attachment 3 –



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Acceptable Knowledge Source Document Summary generated from May 15, 2018 through December 21, 2018 were reviewed to verify that the POCs/SMEs and verification date were included," it is not clear if the review included all CCP sites, or was limited to ORNL/CCP. Therefore, the investigative actions do not adequately describe the extent beyond the original sample size.

**CAUSAL ANALYSIS**

*Not required for this CAR.*

**ACTIONS TO PRECLUDE RECURRENCE**

- Develop a briefing on verbatim procedural compliance for CCP personnel.*
- Perform a Management Self-Assessment (MSA) on procedure compliance.*

**COMMITMENTS**

**DUE DATES**

<i>Issue briefing on verbatim procedural compliance</i>	<i>May 30, 2019</i>
<i>Complete MSA</i>	<i>August 22, 2019</i>
<i>Provide closure documentation to NWP Quality Assurance (QA).</i>	<i>September 5, 2019</i>
<i>NWP QA, transmit closure documentation to the CBFO.</i>	<i>September 19, 2019</i>

**Evaluation:**  
**Not Accepted.**

The actions to preclude recurrence do not provide an effective method for ensuring that conditions adverse to quality identified in a CAR are communicated to Acceptable Knowledge Experts (AKEs). There have been two instances, i.e., CAP for CBFO CAR 19-042 and CAP for CBFO CAR 18-029, where an email emphasizing verbatim procedure compliance was sent by the CCP Technical Support Manager to AKEs. Later, the same condition was identified during an audit of AK activities.

**CAP for CBFO CAR 18-029**

Specifically, in response to CBFO CAR 18-029 from A-18-14, which involved the verbatim compliance of CCP-TP-005, Rev. 29, section/step 4.2.17 (listing Points of Contact/Subject Matter Experts on Attachment 3s summarizing IWMDL documents), an email was sent from the CCP Technical Support Manager to the AKEs about the importance of verbatim compliance. However, after the CAR was issued and the email from the CCP Technical Support Manager was sent, the same condition was identified at the CCP/ORNL Audit A-19-16 (see CAR 19-044).

**CAP for CBFO CAR 19-042**

Also, in response to CBFO CAR 19-042, which involved several incorrect section/step references in CCP-TP-005, an email was sent by the CCP Technical Support Manager to the AKEs effectively suspending/stopping work on section/step 4.2.10[A] – [K]. The CAP for CAR 19-042 included as a Remedial Action, "The CCP Technical Support Manager issued a suspension of work to Acceptable

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*Knowledge Expert (AKE) personnel for procedure CCP-TP-005, CCP Acceptable Knowledge Documentation, Rev. 30, Step 4.2.10 on 5/13/2019. This suspension is only applied to the development of Interface Waste Management Documents Lists (IWMDL)."* However, per CCP-TP-005, step 4.2.10[G], three AK Source Document Summary forms (Attachment 3) for LANL IWMDL documents were signed (i.e., P394 on 5/21/19; P384 on 5/21/19; and D058 on 5/17/19) after the suspension of work on 5/13/2019. CCP-TP-005, Rev. 30, section/step 4.2.10, states: "Collect information identified in the following steps for development of the Attachment 9, Interface Waste Management Documents List." (Section 4.2.10 includes steps [A] – [K].)

Based on the two instances where a directive email from the CCP Technical Support Manager to the AKEs was not effective, an efficient communication method should be established in lieu of an email. The proposed corrective actions are not deemed appropriate to address the condition documented in the CAR, and do not provide reasonable assurance of precluding the likelihood of recurrence.

**REJECTION**

The results of the CAP evaluation indicate that remedial actions, investigative actions (extent) and proposed corrective actions to preclude recurrence are less than adequate. For these reasons, the CAP for CAR 19-044 is rejected. Any indications resulting from the investigative actions (extent and impact) suggesting that further corrective actions may be needed should be addressed in the actions to preclude recurrence portion of the revised CAP.

*Katie Gentry for*  
\_\_\_\_\_  
**Evaluation Performed By:** Randy Fitzgerald, CTAC

*6-11-19*  
\_\_\_\_\_  
**Date**