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**Department of Energy**  
Carlsbad Field Office  
P. O. Box 3090  
Carlsbad, New Mexico 88221  
**JUN 17 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 Amended Corrective Action Plan for Carlsbad Field Office  
Corrective Action Report 19-045 Resulting from CBFO Audit A-19-16

**Reference:** NWP's request letter # QA:19:00228 dated June 6, 2019 from Mr. Dennis Ivey  
to Mr. Martin Navarrete

Dear Mr. Ivey:

The Carlsbad Field Office (CBFO) has completed its evaluation of the amended Corrective Action Plan (CAP) associated with CBFO Corrective Action Report (CAR) 19-045. As documented in the enclosed CAR Continuation Sheet, the evaluation indicates that the amended CAP is acceptable.

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  
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Site Documents ED  
CBFO QA File  
CBFO M&RC  
\*ED denotes electronic distribution

### CAR CONTINUATION SHEET

1. CAR No: 19-045

2. Activity No: A-19-16

3. Page 1 of 2

#### **Block #16 Acceptance of Proposed Corrective Actions:**

An evaluation was performed of the amended Corrective Action Plan (CAP) developed to address Carlsbad Field Office (CBFO) Corrective Action Report (CAR) 19-045. The amended CAP was submitted via Nuclear Waste Partnership LLC (NWP) letter QA:19:00228 UFC:2300.00, dated June 6, 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**

*The finding and the procedure requirements were discussed between CCP Operations management, the Visual Examination (VE) Cognizant Engineer, the Operator, and the Independent Technical Reviewers (ITRs) involved. The Attachment 2 default entry for waste items, weights and weighing codes is "N/A" in order to avoid blank entries. VE personnel were reminded that whenever a waste material parameter inventory and associated weight the weighing code must also be changed from "N/A" to the correct weighing code, per CCP-TP-113, Table 3.*

*NCR-ORNL-0339-19 was issued to correct the weighing code(s) on ten BDRs*

#### **Evaluation:**

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

#### **INVESTIGATIVE ACTIONS**

*CCP-TP-113 CCP Standard Contact-Handled Waste Visual Examination Rev. 22 was issued June 18, 2018. There have been 23 VE Batch Data Reports (BDR) generated at the Oak Ridge National Laboratory (ORNL) since the procedure issue date. The BDRs were reviewed and it was found that ten of them had at least one instance of a waste material parameter weighing code selection error. VE BDRs from Los Alamos National Laboratory (LANL) generated during the same time period were also reviewed. It was found that three BDRs had the same issue and have been identified on NCR-LANL-0441-19. ORNL and LANL are the only generator facilities to use CCP-TP-113.*

*There was no impact, as no regulatory noncompliance conditions were identified.*

#### **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.*

**CAR CONTINUATION SHEET**

1. CAR No: 19-045

2. Activity No: A-19-16

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**ACTIONS TO PRECLUDE RECURRENCE**

*Generate a briefing for VE Operators, ITRs, and Site Project Managers (SPM). Discuss error-likely situations; and the need for identifying critical steps of a task to increase attention to performance and the associated reviews.*

**COMMITMENTS**

**DUE DATES**

*Complete briefing to affected personnel.*

June 27, 2019

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

July 4, 2019

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

July 11, 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 amended CAP indicate that the remedial actions, investigative actions, and proposed corrective actions satisfactorily address the condition adverse to quality documented in CAR 19-045, and provide adequate measures for precluding recurrence. Therefore, it is recommended that the amended CAP for CAR 19-045 be approved.



Evaluation Performed By: Tim Boswell, CTAC

6/17/19

Date