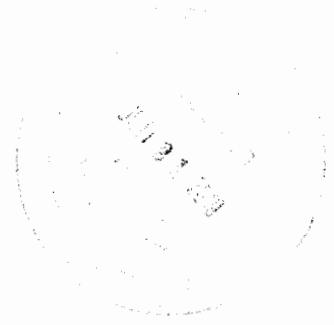




Department of Energy
Carlsbad Field Office
P O Box 3090
Carlsbad, New Mexico 88221

ENTERED



JUN 21 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 19-060 Resulting from CBFO
Audit A-19-18, LANL/CCP Recertification Audit

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) 19-060. As documented in the enclosed CAR Continuation Sheets, the evaluation indicates that the CAP is rejected due to not providing adequate measures to address remedial actions, impact or extent of the condition or effective actions to reduce the likelihood of recurrence for the condition noted in CAR 19-060.

The revised CAP for this CAR is due to CBFO Quality Assurance by July 12, 2019.

If you have any questions concerning the evaluation, please contact me at (575) 234-7491.

Sincerely,

Dennis S. Miehl
Senior Quality Assurance Specialist

Enclosure



Mr. Dennis Ivey

-2-

cc w/enclosure:

R. Murray, EM-3.113	*ED
T. Shrader, CBFO	ED
K. Lachman, CBFO	ED
C. Fesmire, CBFO	ED
D. Gadbury, CBFO	ED
M. Navarrete, CBFO	ED
M. Stapleton, CBFO	ED
N. Castaneda, CBFO	ED
S. Goodrum, NA-LA	ED
D. Hintze, EM-LA	ED
D. Nickless, EM-LA	ED
L. Bishop, EM-LA	ED
J. Shaffer, EM-LA	ED
J. Sanchez, DOE/NNSA	ED
T. Wald, DOE/NNSA	ED
B. Covert, NWP	ED
S. Strong, NWP	ED
M. Percy, NWP/CCP	ED
R. Lee, NWP/CCP	ED
R. Reeves, NWP/CCP	ED
P. Tilmon, NWP/CCP	ED
T. Groover, NWP/CCP	ED
J. Carter, NWP/CCP	ED
V. Ballew, NWP/QA	ED
S. Saiz, NWP/QA	ED
A. Boyea, NWP/QA	ED
J. Walsh, EPA	ED
J. Ellis, EPA	ED
T. Peake, EPA	ED
E. Feltcorn, EPA	ED
J. Kieling, NMED	ED
R. Maestas, NMED	ED
D. Biswell, NMED	ED
M. McLean, NMED	ED
T. Runyon, CTAC	ED
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C. Castillo, CTAC	ED
B. Pace, CTAC	ED
R. Castillo, CTAC	ED
P. Hinojos, CTAC	ED
G. White, CTAC	ED

CBFO QA File

CBFO M&RC

*ED denotes electronic distribution

CAR CONTINUATION SHEET

1. CAR No: 19-060

2. Activity No: A-19-18

3. Page 1 of 2

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) 19-060. The CAP was submitted via Nuclear Waste Partnership LLC (NWP) letter QA:19:00252, UFC:2300.00, dated June 18, 2019, from Mr. D. Ivey, Manager, NWP Quality Assurance, to Mr. D. S. Miehl, 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

No remedial actions required.

Evaluation:

Not Accepted.

Appropriate remedial actions need to address the condition adverse to quality identified in the CAR.

INVESTIGATIVE ACTIONS

Investigative Actions: CCP's investigation confirmed that a second qualified operator was used to manipulate the controls during the performance of the training container as described in CAR 19-060 Block #9. The investigation also determined that this practice is known and accepted by the CCP Nondestructive Examination (NDE) technical staff and management; therefore, a point-by-point review of the requirements cited in CAR 19-060 was performed to ensure any programmatic deficiencies are corrected and the extent and impact are understood. The results of that review are provided below.

Requirement #1

DOE/CBFO-94-1012, Quality Assurance Program Document, Rev. 13, section 2.1[A] states: "Work shall be performed under controlled conditions using approved instructions, procedures, or other appropriate means."

Conclusion

CCP-TP-053, CCP Standard Real- Time Radiography (RTR) Inspection Procedure was the approved procedure in use to perform the training container scan. Current practices are adequate.

Requirement #2

CCP-TP-053, CCP Standard Real- Time Radiography (RTR) Inspection Procedure Rev. 16, section 3.1.1 states: "[Real-Time Radiography (RTR) Operator] Operates the RTR system to determine the attributes of the waste content of a waste container."

Conclusion

This citation from the RTR Operator "Responsibilities" section does not apply to the context of a training container nor was it ever intended to prohibit the use of a second qualified operator to manipulate the controls during the scan of a training container. Similarly, the responsibilities delineated by 3.1.5, 3.1.6, and 3.1.7 only apply to waste containers and not training containers. A second operator has been provided to manipulate RTR controls when the operator performing the training container is not qualified to operate the system being used because they have not completed all Host Site required training because their primary work location is at another Host Site and they are performing the training container to qualify as Independent Technical Review (ITR) only. Current practices are adequate.

Requirement #3

CCP-QP-043, CCP Operations Level Training and Qualification, Rev. 3, section 5.4.9 (NOTE) states, "Radiography Training Containers for contact-handled (CH) waste streams must be examined using the same processes and procedures as those used for examining transuranic (TRU) and TRU-mixed waste". The procedures may be modified as necessary to allow use with the Training Containers."

CAR CONTINUATION SHEET

1. CAR No: 19-060

2. Activity No: A-19-18

3. Page 2 of 2

Conclusion

CCP-TP-053, CCP Standard Real- Time Radiography (RTR) Inspection Procedure was used to scan the training container which is the same procedure used for examining TRU and TRU-mixed waste. Furthermore, there is no need to modify this procedure to allow a second operator to manipulate the controls during the scan of a training container because the procedures already accommodates this as described above. Current practices are adequate.

Requirement #4

CCP-P0-005, CCP Conduct of Operations, Rev. 30, section 18.7 states: "Procedures will be adhered to at all times. ***All CCP operations will be conducted with the procedure open and followed step-by-step."

Conclusion

As described above, the applicable procedures were adhered to at all times and the investigation revealed no evidence that the procedure was not open and followed step-by-step. Current practices are adequate.

Overall Summary of Investigative Actions

Current procedures allow the use of a second operator to manipulate controls during training container scans and this practice complies with all requirements cited in CAR 19-060. In addition, this practice supports compliance with CCP-P0-047, CCP Training and Qualification Program Document, Rev. 3; which states: "Personnel who are in the process of completing training on tasks and activities for which they are not fully qualified must work under the direct supervision of someone who is qualified and must not independently make decisions or take action when that work could affect facility safety" (i.e: manipulate the controls of a system on a site which they are not qualified to do so). This requirement springs directly from DOE 0 426.2, Personnel Selection, Training, Qualification, and Certification Requirements for DOE Nuclear Facilities.

Evaluation:

Not Accepted.

Appropriate investigative actions need to address the condition adverse to quality identified in the CAR. Investigative actions need to address compliance and implementation of the CCP-TP-053, Rev. 16, CCP Standard Real-Time Radiography (RTR) Inspection Procedure, when used to perform the training container scans. CCP-QP-043, Rev. 3, CCP Operations Level Training and Qualification, section 5.4.9 (NOTE) re-emphasizes: "Radiography Training Containers for contact-handled (CH) waste streams must be examined using the same processes and procedures as those used for examining transuranic (TRU) and TRU-mixed waste". The procedures may be modified as necessary to allow use with the Training Containers." Investigative actions need to address when and how deviations to procedures (CCP-TP-053) are made as it applies to RTR operator training container scans.

CAUSAL ANALYSIS

Not required

ACTIONS TO PRECLUDE RECURRENCE

Based on conclusions of the investigative actions, CCP believes no further actions are necessary.

Evaluation:

Not Accepted.

Appropriate actions to preclude recurrence need to address the condition adverse to quality identified in the CAR.

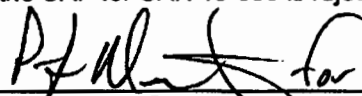
COMMITMENTS

None

DUE DATES

REJECTION

The results of the CAP evaluation indicate that the remedial actions, investigative actions, and actions to preclude recurrence do not satisfactorily address the condition adverse to quality documented in CAR 19-060. For these reasons, the CAP for CAR 19-060 is rejected.


Evaluation Performed By: Berry Pace, CTAC

6/20/19
Date