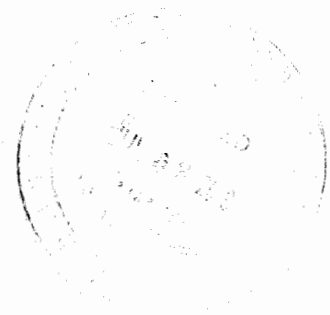




ENTERED

Department of Energy
Carlsbad Field Office
P. O. Box 3090
Carlsbad, New Mexico 88221
JUL 02 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 Revised 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 revised 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 acceptable.

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

Sincerely,

Handwritten signature of Anthony R. Stone

Anthony R. Stone
Senior Quality Assurance Specialist

Handwritten signature of D. J. J. J.

Enclosure

cc: w/enclosure

- R. Murray, EM \*ED
K. Lachman, CBFO ED
D. 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. Harvill, 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. Feltcorn, EPA ED
J. Kieling, NMED ED
R. Maestas, NMED ED
D. Biswell, NMED ED
M. McLean, NMED ED
J. Dawson, Trinity Engr. ED
T. Runyon, CTAC ED
P. Martinez, CTAC ED
C. Castillo, CTAC ED
K. Gentry, CTAC ED
D. Blauvelt, CTAC ED
R. Fitzgerald, 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

1. CAR No: 19-042

2. Activity No: A-19-16

3. Page 1 of 2

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

An evaluation was performed of the revised Corrective Action Plan (CAP) developed to address Carlsbad Field Office (CBFO) Corrective Action Report (CAR) 19-042. The revised CAP was submitted via Nuclear Waste Partnership LLC (NWP) letter QA:19:00259 UFC:2300.00, dated June 20, 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 revised 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:**

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

#### **INVESTIGATIVE ACTIONS**

*A review at all CCP generator sites was performed of all the IWMDLs issued under Rev. 30 of CCP-TP-005 (Issued December 21, 2018). 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. Note: The generator sites reviewed include ORNL, LANL and ANL.*

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

#### **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**

- *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.*
- *Complete Required Reading of CCP-TP-005, Rev. 31 by AKEs.*

**CAR CONTINUATION SHEET**

1. CAR No: 19-042	2. Activity No: A-19-16	3. Page 2 of 2
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- *Develop and disseminate a CCP Lessons Learned on procedure development and review. CCP Training will submit the Lessons Learned to the CCP Records program for retention. The Lessons Learned is normally completed through the Required Reading module of the Integrated Data Center (IDC).*

**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>	<i>Complete</i>
<i>Review CCP-TP-005, CCP Acceptable Knowledge Documentation for additional incorrect references and revise the procedure as applicable.</i>	<i>August 1, 2019</i>
<i>Complete Required Reading and CCP-TP-005, Rev. 31 by AKEs.</i>	<i>August 15, 2019</i>
<i>Develop and disseminate a CCP Lessons Learned on procedure development and review.</i>	<i>August 15, 2019</i>
<i>Provide closure documentation to NWP Quality Assurance (QA).</i>	<i>August 22, 2019</i>
<i>NWP QA, transmit closure documentation to the CBFO</i>	<i>September 5, 2019</i>

**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 revised CAP indicate that the remedial actions, investigative actions, and proposed corrective actions satisfactorily address the condition adverse to quality documented in CAR 19-042, and provide adequate measures for precluding recurrence. Therefore, it is recommended that the revised CAP for CAR 19-042 be approved.

*Katei Gentry for*

Evaluation Performed By: Randy Fitzgerald, CTAC

*6/26/19*

Date

### CAR CONTINUATION SHEET

1. CAR No: 19-043

2. Activity No: A-19-16

3. Page 1 of 2

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

An evaluation was performed of the revised Corrective Action Plan (CAP) developed to address Carlsbad Field Office (CBFO) Corrective Action Report (CAR) 19-043. The revised CAP was submitted via Nuclear Waste Partnership LLC (NWP) letter QA:19:00259 UFC:2300.00, dated June 20, 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 revised 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:**

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

#### **INVESTIGATIVE ACTIONS**

*All CCP generator sites 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:**

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: 19-043	2. Activity No: A-19-16	3. Page 2 of 2
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#### ACTIONS TO PRECLUDE RECURRENCE

*Develop a briefing on CAR 19-043 and verbatim procedural compliance. The approved briefing will be routed to CCP personnel as supplemental required reading. CCP Training will submit the record copy to the CCP records program for retention.*

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

#### COMMITMENTS

#### DUE DATES

*Issue briefing on verbatim procedural compliance.*

*July 11, 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:

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 revised CAP indicate that the remedial actions, investigative actions, and proposed corrective actions satisfactorily address the condition adverse to quality documented in CAR 19-043, and provide adequate measures for precluding recurrence. Therefore, it is recommended that the revised CAP for CAR 19-043 be approved.

*Katie Gentry for*

Evaluation Performed By: Randy Fitzgerald, CTAC

*6/26/19*

Date

**CAR CONTINUATION SHEET**

<b>1. CAR No:</b> 19-044	<b>2. Activity No:</b> A-19-16	<b>3. Page 1 of 2</b>
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**Block #16 Acceptance of Proposed Corrective Actions:**

An evaluation was performed of the revised Corrective Action Plan (CAP) developed to address Carlsbad Field Office (CBFO) Corrective Action Report (CAR) 19-044. The revised CAP was submitted via Nuclear Waste Partnership LLC (NWP) letter QA:19:00259 UFC:2300.00, dated June 20, 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 revised 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:**

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

**INVESTIGATIVE ACTIONS**

*All CCP generator site's 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. Note: The generator sites reviewed include ORNL, LANL, and ANL.*

*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:**

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**

<b>1. CAR No:</b> 19-044	<b>2. Activity No:</b> A-19-16	<b>3. Page 2 of 2</b>
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**ACTIONS TO PRECLUDE RECURRENCE**

*Develop a briefing on CAR 19-044 and verbatim procedural compliance. CCP Training will submit the Lessons Learned to the CCP Records program for retention. The Lessons Learned is normally completed through the Required Reading module of the Integrated Data Center (IDC).*

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

**COMMITMENTS**

**DUE DATES**

*Issue briefing on verbatim procedural compliance*

*July 11, 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:**

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 revised CAP indicate that the remedial actions, investigative actions, and proposed corrective actions satisfactorily address the condition adverse to quality documented in CAR 19-044, and provide adequate measures for precluding recurrence. Therefore, it is recommended that the revised CAP for CAR 19-044 be approved.

*Katie Gentry for*

**Evaluation Performed By:** Randy Fitzgerald, CTAC

*6/26/19*

**Date**