

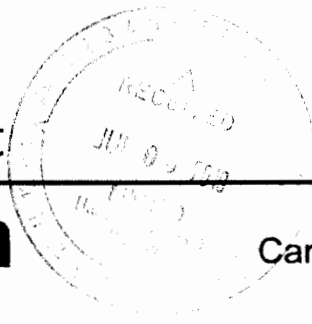


United States Government

Department of Energy

memorandum

Carlsbad Field Office
Carlsbad, New Mexico 88221



DATE: JUL 03 2019

REPLY TO
ATTN OF: CBFO:OQA:DSM:JM:19-0969:UFC 2300.00

SUBJECT: Issuance of CAR 19-064 Los Alamos National Laboratory Interface Waste Management Documents List (IWMDL)

TO: Adrienne Lyn Nash, National Nuclear Security Administration (NNSA)

Please be advised that the Carlsbad Field Office – Office of Quality Assurance has issued a Corrective Action Report (CAR) for a condition adverse to quality, as described in the attached CAR 19-064. Please take the necessary steps required to complete the corrective actions for this CAR.

Please provide a documented response for the CAR, ensuring that the required actions indicated in CAR Block 12 are addressed, including a schedule for completion of corrective actions. Please return your response/Corrective Action Plan (CAP) to me on or before the due date identified in Block 14a of the CAR form.

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

Dennis S. Miehl
Senior Quality Assurance Specialist

Attachment

cc: w/attachment


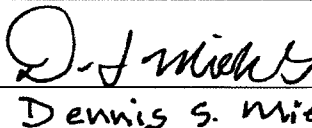
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|----------------------|-----|---------------------|----|
| K. Lachman, CBFO | *ED | M. McLean, NMED | ED |
| D. C. Gadbury, CBFO | ED | M. Percy, NWP/CCP | ED |
| A. Stone, CBFO | ED | R. Lee, NWP/CCP | ED |
| M. Stapleton, CBFO | ED | T. Groover, NWP/CCP | ED |
| K. Princen, CBFO | ED | T. Runyon, CTAC | ED |
| C. Fesmire, CBFO | ED | P. Martinez, CTAC | ED |
| J. Sanchez, DOE/NNSA | ED | C. Castillo, CTAC | ED |
| T. Wald, DOE/NNSA | ED | P. Gomez, CTAC | ED |
| K. Lacy, TRIAD | ED | R. Castillo, CTAC | ED |
| L. Sanchez, TRIAD | ED | R. Fitzgerald, CTAC | ED |
| R. Hollis, TRIAD | ED | R. Blauvelt, CTAC | ED |
| P. Carson, TRIAD | ED | P. Hinojos, CTAC | ED |
| J. Hurtle, TRIAD | ED | G. White, CTAC | ED |
| R. Maestas, NMED | ED | CBFO QA File | |
| D. Biswell, NMED | ED | CBFO M&RC | |

*ED denotes electronic distribution

190705



CBFO CORRECTIVE ACTION REPORT

1. CAR No.: 19-064	2. Activity Report No.: N/A	3. Page 1 of 2
4. Controlling document: CCP-PO-012, Rev. 16 CCP-TP-005, Rev. 30	5. Responsible CBFO Manager: N/A	
6. Responsible organization: TRIAD	7. CAQ discussed with: Adrienne Nash, Keith Lacey	
8. Requirement: See CAR Continuation Sheet		
9. Condition Adverse to Quality (CAQ): See Continuation Sheet		
10. CAR Initiator:		
Printed Name: <u>Randy Fitzgerald</u> 		Date: <u>7/2/19</u>
11. Deficiency classification:		12. Type of actions required:
11a. Significant CAQ? (If "Yes", go to block 15b)	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	12a. Remedial? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
11b. Work Suspension recommended? (If "Yes", go to block 15b)	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	12b. Investigative? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
11c. WAP-related Deficiency?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	12c. Causal Analysis? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
11d. Accelerated corrective action required? (If "Yes", go to block 14b)	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	12d. Actions to Preclude Recurrence? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
13. Trend Code: <u>WP-05</u>		
14a. Response due date: <u>8-2-19</u>		
14b. Required corrective action completion date: N/A		
15. Concurrence:		
a. Quality Assurance Director/Quality Assurance Representative:		
Printed Name: <u>Dennis S. Mientz</u> 		Date: <u>7-3-19</u>
b. CBFO Office of Quality Assurance Director: (If SCAQ, work suspension, or accelerated corrective action; otherwise mark as "N/A")		
Printed Name: <u>N/A</u>		Date: _____
16. Acceptance of Proposed Corrective Actions:		
Printed Name and Title: _____		Date: _____
17. Acceptance of Corrective Action Completion:		
Printed Name: _____		Date: _____
18. Closure:		
Printed Name: _____		Date: _____

CAR CONTINUATION SHEET

1. CAR No: 19-064	2. Activity No: N/A	3. Page 2 of 2
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8. Requirement(s):

CCP-TP-005, *CCP Acceptable Knowledge Documentation*, Rev. 30, section 3.6.2 states: “[Site Management Representative (SMR)] Provides revisions to procedures on IWMDL, and provides new procedures affecting waste stream management and packaging to CCP.”

CCP-TP-005, *CCP Acceptable Knowledge Documentation*, Rev. 30, section 3.6.3 states: “[Site Management Representative (SMR)] Performs quarterly reviews of the IWMDL and notifies the SPM that the list is complete and includes the most current revision of the relevant procedures.”

CCP-PO-012, *CCP/Los Alamos National Laboratory (LANL) Interface Document*, Rev. 16, section 4.18.12 states: “At a minimum of once per calendar quarter, Responsible Division Leader/Designee will review the current IWMDL and provide written assurance to the CCP SPM that the list is up to date OR provide necessary documentation to revise the list.”

9. Condition Adverse to Quality:

Three instances occurred where LANL site personnel did not notify CCP personnel of changes to waste management procedures that were listed in the Interface Waste Management Documents List (IWMDL). The first instance was for the 4th quarter of 2017 for waste stream LA-OS-00.01.001. The second instance was for the 3rd quarter of 2017 for waste streams: LA-MHD01.001 and LA-CIN01.001. The third instance was for six quarters beginning with the 2nd quarter of 2017 through the 3rd quarter of 2018. Additionally, the third instance led to an outdated procedure being listed on the IWMDLs for six quarters for waste streams: LA-MHD01.001, LA-CIN01.001 and LA-MIN06-NS.001.

INSTRUCTIONS FOR PROVIDING A CORRECTIVE ACTION PLAN

WASTE ISOLATION PILOT PLANT
U.S. DEPARTMENT OF ENERGY
Carlsbad Field Office

INSTRUCTIONS FOR PROVIDING A CORRECTIVE ACTION PLAN

You are requested to provide a corrective action plan (CAP) in response to this corrective action report (CAR) by the date identified in block 14a of the CAR. If this date cannot be met, provide a written request for extension to the Quality Assurance Representative with courtesy copy to the Office of Quality Assurance Director. This request must include justification for the delay and must be provided seven calendar days prior to the response due date (CAR block 14a).

The CAP shall address the corrective actions indicated in CAR block 12. As appropriate, develop the plan in accordance with the following sequence and format:

In order to develop the CAP, perform an investigative action to determine the extent and impact of the deficiency and to identify the causal factors. Next, determine the actions required to correct the adverse condition. The plan shall include the following information, as appropriate to CAR block 12.

1. Corrective action response for CAR # 19-064
 - A. **Remedial Actions**-Describe actions required or taken to correct the specific conditions noted and any similar conditions identified during discovery.
 - B. **Investigative Actions**-Describe the investigative actions performed to determine the extent and impact of the deficiency and the results of the investigation. This will include a determination of the acceptability of any data generated prior to resolution of the deficiency.
 - C. **Causal Analysis**-Identify the causal factor(s) of the CAR condition. Refer to Step 5.3.2 if the CAR was issued to CBFO or Step 5.3.3 if the CAR was issued to a participant organization.
 - D. **Actions to Preclude Recurrence**-Identify the corrective actions required to address the causal factors of the condition in order to preclude recurrence.

NOTE: Schedule for completion of corrective actions is always required.
2. For each action above, identify the anticipated (or actual, if complete) completion date.
3. The response must identify the individual having the overall responsibility for completion of the corrective actions.