Subject: Evaluation of the Revised CAP for CBFO CAR 19-060 Resulting from CBFO Audit A-19-18

Dear Mr. Ivey,

The Carlsbad Field Office (CBFO) has completed its evaluation of the revised 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 revised CAP is acceptable.

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

Sincerely,

Dennis S. Mehls
Senior Quality Assurance Specialist

Enclosure

cc: enclosure
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Site Documents
CBFO QA File
CBFO M&RC

*ED denotes electronic distribution
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) 19-060. The revised CAP was submitted via Nuclear Waste Partnership LLC (NWP) letter QA:19:00300 UFC:2300.00, dated July 15, 2019, from Mr. Dennis Ivey, Manager, NWP Quality Assurance, to Mr. D. S. Miehls, 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**

CCP will issue a Standing Order to clarify that it is acceptable for a second qualified operator to manipulate the controls during the scan of a training container. The Standing Order will be issued as Required Reading for RTR Operators. The Standing Order will be cancelled upon its incorporation in CCP-TP-053, CCP Standard Real-Time Radiography (RTR) Inspection Procedure or at the direction of the CCP Manager.

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

**INVESTIGATIVE ACTIONS**

CCP's investigation of the Condition Adverse to Quality (CAQ) associated with CAR 19-060 confirmed that a second qualified operator was used to manipulate the controls during the performance of the training container. This practice is known and accepted by the CCP Nondestructive Examination (NDE) technical staff and management.

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.

**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. Although CCP never interpreted the language "Operates the RTR system to determine the attributes of the waste content of a waste container" to prohibit the current practice of using a second qualified operator to manipulate the controls during training container scans as described above, CCP will add a note above 3.1.1 clarifying that this is an acceptable practice.

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."

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.

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 in the conclusion resulting from the investigation of requirement #2 above, CCP will clarify the meaning of CCP-TP-053, CCP Standard Real-Time Radiography (RTR) Inspection Procedure Rev. 16, section 3.1.1 with a note. However, nothing in this investigation revealed that the operators failed to adhere to the procedure with it open and followed step by step.

Extent
A review of all training container scans completed by CCP in 2018 and 2019 to date (total of 37) was performed. This condition was identified in a total of three training container scans during that period—all occurring at the Oak Ridge National Laboratory (ORNL) TRU Waste Processing Center (TWPC).

Impact
None.
Evaluation:
The investigative actions described above are deemed appropriate to address the condition adverse to quality identified in the CAR.

CAUSAL ANALYSIS
N/A

ACTIONS TO PRECLUDE RECURRENCE
CCP will add a note to CCP-TP-053, CCP-TP-053, CCP Standard Real-Time Radiography (RTR) Inspection Procedure, above 3.1.1 clarifying that it is acceptable for a second qualified operator to manipulate the controls during the scan of a training container.

COMMITMENTS
CCP will issue a Standing Order to clarify that it is acceptable for a second qualified operator to manipulate the controls during the scan of a training container.

RTR operators will complete required reading of the above Standing Order

CCP will add a note to CCP-TP-053, CCP Standard Real-Time Radiography (RTR) Inspection Procedure above 3.1.1 clarifying that it is acceptable for a second qualified operator to manipulate the controls during the scan of a training container.

Provide closure documentation to NWP Quality Assurance (QA).

NWP QA, transmit closure documentation to the CBFO.

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 19-060, and provide adequate measures for precluding recurrence. Therefore, it is recommended that the revised CAP for CAR 19-060 be approved.

Evaluation Performed By: Porf Martinez, CTAC
Date: 8/14/19