Subject: Evaluation of the CAP for CBFO CAR 19-075 Resulting from CBFO Audit A-19-29

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) 19-075. As documented in the enclosed CAR Continuation Sheet, the evaluation indicates that the CAP is acceptable.

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

Sincerely,

Dennis S. Miehls
Senior Quality Assurance Specialist

Enclosure

cc: w/enclosure
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G. White, CTAC ED
Site Documents ED
CBFO QA File ED
CBFO M&RC ED

*ED denotes electronic distribution
An evaluation was performed of the Corrective Action Plan (CAP) developed to address Carlsbad Field Office (CBFO) Corrective Action Report (CAR) 19-075. The CAP was submitted via Nuclear Waste Partnership LLC (NWP) letter QA: 19:00407 UFC:2300.00, dated September 30, 2019, from Mr. D. Ivey, Manager, NWP Quality Assurance, to Mr. D. S. Miehls, Senior Quality Assurance Specialist, CBFO 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**

CCP has taken the following remedial action in response to the CAR condition:

A “freeze-file” was initiated and submitted to CCP Document Services identifying a needed revision to CCP-PO-048, CCP/LLNL Interface Document to include AK Assessments in Section 4.21.

**Evaluation:**

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

**INVESTIGATIVE ACTIONS**

The investigation revealed that the lack of including AK Assessments in Section 4.21 of CCP-PO-048 was caused by an oversight when the document was authored.

**Extent**

A review was performed of all other existing host-site CCP interface documents addressing host-sites where contact-handled (CH) and remote-handled (RH) waste characterization activities are performed and concluded that the CAR condition is isolated: specifically to CCP-PO-048.

**Impact**

The impact of the condition was determined to be negligible with no negative consequences on the program since although, the AK Assessments at LLNL have been initiated, they have not been completed for required distribution.

**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 RECURRENTCE
A Lessons Learned will be developed and distributed reemphasizing the requirement for identifying those documents required to be referenced in Interface Documents. CCP-PO-048, will be revised to include the identification of AK Assessments in the list of documents in the appropriate section.

COMMITMENTS
Submitted Freeze File to CCP Document Services to include AK Assessments in the next revision of CCP-PO-048.

Develop and disseminate a Lessons Learned reemphasizing the requirement for identifying all required reference documents in Interface Documents 12/05/2019

Revise CCP-PO-048 to include AK Assessment documents in Section 4.21 01/24/2020

Provide closure documentation to NWP Quality Assurance (QA). 01/28/2020

NWP QA, transmit closure documentation to the CBFO. 02/04/2020

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 CAP indicate that the remedial actions, investigative actions, and proposed corrective actions satisfactorily address the condition adverse to quality documented in CAR 19-075, and provide adequate measures for precluding recurrence. Therefore, it is recommended that the CAP for CAR 19-075 be approved.

Katie Gentry 9-30-19
Evaluation Performed By: Katie Gentry, CTAC Date