DATE: NOV 04 2019

REPLY TO: CBFO:OQA:ARS:JM:19-1093:UFC 2300.00

ATTN OF: Evaluation of the CAPs for CBFO CARs 19-077 and 19-078 Resulting from CBFO Audit A-19-26

TO: Mr. Jim Malmo, DOE-ID

The Carlsbad Field Office (CBFO) has completed its evaluation of the Corrective Action Plans (CAPs) associated with CBFO Corrective Action Reports (CARs) 19-077 and 19-078. As documented in the enclosed CAR Continuation Sheets, the evaluations indicate that the CAPs are acceptable.

If you have questions concerning the evaluation, please contact me at (575) 234-7475.

Anthony R. Stone
Senior Quality Assurance Specialist
**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) 19-077. The CAP was submitted via Fluor Idaho letter CCN 324357, dated October 21, 2019, from Mr. Steven D. Poling, Director, Waste Disposition Programs, to Mr. James A. Malmo, Assistant Manager, Waste Disposition Idaho Cleanup Project.

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**

*The training form, AFRTRCON, RTR Bi-Annual Training Container, Rev. 1 was changed to add the WMC*

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

**INVESTIGATIVE ACTIONS**

**Extent**

*AMWTP did not identify the need for a WMC assignment to the RTR training containers as part of the continuing training process. The current process identifies any prohibited items, the assignment of waste items to waste material parameters and verifies the summary categories present in the training container.*

**Impact**

*There is no impact to the acceptability of any data generated prior to resolution of this deficiency.*

**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**

1. Revise TPR-8089 to include language to include identifying the WMC during semiannual RTR inspections.
2. Complete training with the qualified RTR operators on the changes to the RTR training container inspection

COMMITMENTS

Scheduled Completion Date: 11-7-19

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 19-077, and provide adequate measures for precluding recurrence. Therefore, it is recommended that the CAP for CAR 19-077 be approved.

Evaluation Performed By: Porf Martinez, CTAC 18/30/19
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) 19-078. The CAP was submitted via Fluor Idaho letter CCN 324357, dated October 21, 2019, from Mr. Steven D. Poling, Director, Waste Disposition Programs, to Mr. James A. Malmo, Assistant Manager, Waste Disposition Idaho Cleanup Project.

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

Revise TPR-8089 to include instruction for completing AK rework actions.

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

INVESTIGATIVE ACTIONS

Extent

TPR-8089 does not give specific instruction on how AK rework is completed after an AK evaluation has been completed. RTR rework is completed by a qualified RTR operator and is part of the knowledge learned and developed during qualification.

Impact

There is no impact to the acceptability of any data generated prior to resolution of this deficiency.

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

Complete training with the qualified RTR operators on the changes to the RTR procedure for completing AK rework
### COMMITMENTS

**Scheduled Completion Date:** 11-7-19

**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.

### DUE DATES

### 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 19-078, and provide adequate measures for precluding recurrence. Therefore, it is recommended that the CAP for CAR 19-078 be approved.

**Evaluation Performed By:** Porf Martinez, CTAC

**Date:** 10/30/19