Mr. Dennis Ivey, Manager
Quality Assurance
Nuclear Waste Partnership LLC
P.O. Box 2078
Carlsbad, NM 88221-2078

Subject: Verification and Acceptance of Corrective Actions for CAR 19-075 Resulting from LLNL Certification Audit A-19-29

Dear Mr. Ivey:

Enclosed are the results of the Carlsbad Field Office (CBFO) evaluation and verification of documentation demonstrating completion of the corrective actions associated with CBFO Corrective Action Report (CAR) 19-075, which resulted from Audit A-19-29. The results of the verification are documented in the enclosed CAR Continuation Sheets, and indicate that the documentation of completion of corrective actions is acceptable. The CAR is considered closed.

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

Sincerely,

[Signature]

Dennis S. Miehls
Senior Quality Assurance Specialist

Enclosure
cc: w/enclosure
R. Murray, EM-3.113 ED
K. Lachman, CBFO ED
M. Hall, CBFO ED
D. C. Gadbury, CBFO ED
J.R. Stroble, CBFO ED
T. Carver, CBFO ED
A. Stone, CBFO ED
J. Lopez, CBFO ED
M. Stapleton, CBFO ED
N. Castaneda, CBFO ED
J. Davis III, DOE-LLNL ED
S. Dunagan, NWP ED
S. Strong, NWP ED
M. Pearcy, NWP ED
R. Lee, NWP ED
R. Reeves, NWP ED
R. Hollister, NWP ED
D. Moody, NWP ED
B. Verlanic, NWP ED
L. Calder, NWP ED
D. Wade, NWP ED
J. Harvill, NWP ED
B. Pace, NWP ED
J. Carter, NWP ED
V. Ballew, NWP ED
S. Saiz, 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
T. Runyon, CTAC ED
P. Martinez, CTAC ED
C. Castillo, CTAC ED
R. Castillo, CTAC ED
K. Gentry, CTAC ED
P. Hinojos, CTAC ED
G. White, CTAC ED
Site Documents ED
P. Theisen, SNL-CPG ED
CBFO QA File
CBFO M&RC
*ED denotes electronic distribution
Block #17 & 18 Acceptance of Corrective Action Completion and Closure:
The Carlsbad Field Office (CBFO) has reviewed the closure package for Corrective Action Report (CAR) 19-075, including objective evidence and supporting documentation, submitted via Nuclear Waste Partnership LLC (NWP) letter QA:19:00468 UFC:2300.00, dated November 13, 2019, from Mr. Dennis Ivey, Manager, NWP Quality Assurance, to Mr. Dennis Miehls, Senior Quality Assurance Specialist, CBFO Office of Quality Assurance.

Italicized text, taken verbatim from the Corrective Action Plan (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.

**Verification:**

The objective evidence submitted in this closure package was reviewed and verified to meet the required remedial actions commitment. The evidence included an email to Central Characterization Program (CCP) Document Services personnel dated August 29, 2019, with the subject: “Freeze File CCP-PO-048.”

**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.

**Verification:**

Investigative actions were evaluated and found to be acceptable, as documented in CBFO CAP acceptance memorandum CBFO:OQA:DSM:JM:19-1066:UFC 2300.00.

**CAUSAL ANALYSIS**

*Not required for this CAR.*
ACTIONS TO PRECLUDE RECURRENCE
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

Verification:
Verified actions to preclude recurrence are acceptable through review of supporting documentation submitted in the CAR 19-075 closure package. The reviewed documentation included email correspondence from the CCP Operations Manager to the CCP project managers at each generator site requesting a review of each CCP interface document at that generator site for similar instances as cited in the subject CAR, and the response from each reviewer. A Lessons Learned (LL-2019-13) dated November 6, 2019, describing the subject CAR was provided, along with an acknowledgement roster. A revised version of CCP-PO-048 (Rev. 2), CCP/LLNL Interface Document, dated November 12, 2019, was provided to demonstrate corrective action.

CLOSURE ACCEPTANCE
Based on the results of the review of the objective evidence included in the CAR 19-075 closure package, it is recommended that CAR 19-075 be closed.

Katie Gentry
Evaluation Performed By: Katie Gentry, CTAC
11-13-19
Date