



**Department of Energy**  
Carlsbad Field Office  
P. O. Box 3090  
Carlsbad, New Mexico 88221  
**JAN 06 2020**

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 19-060 from  
Audit A-19-18, Los Alamos National Laboratory Recertification Audit

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) 19-060, which resulted from Audit A-19-18 conducted May 21 – June 3, 2019. 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. As a result, the CAR is considered closed.

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

Sincerely,

A handwritten signature in black ink, appearing to read "D. S. Miehl".

Dennis S. Miehl  
Senior Quality Assurance Specialist

Enclosure



cc: w/enclosure

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G. Sosson, CBFO ED  
K. Lachman, CBFO ED  
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Site Documents ED  
CBFO QA File  
CBFO M&RC  
\*ED denotes electronic distribution

## CAR CONTINUATION SHEET

1. CAR No: 19-060

2. Activity No: A-19-18

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### 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) 19-060, including objective evidence and supporting documentation, submitted via Nuclear Waste Partnership LLC (NWP) letter QA:19:00488 UFC:2300.00, dated December 5, 2019, from Mr. D. Ivey, Manager, NWP Quality Assurance, to Mr. Dennis Miehl, 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 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.*

#### Verification:

The objective evidence submitted in this closure package was reviewed and verified to meet the required remedial actions commitment. The evidence included CCP Standing Order CCP-SO-137 Rev. 0, which was initiated on July 15, 2019 and cancelled on December 3, 2019.

#### 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.*

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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.*

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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.

**Verification:**

Investigative actions were evaluated and found to be acceptable, as documented in CBFO CAP acceptance letter CBFO:OQA:DSM:JM:19-1025:UFC 2300.00 dated August 15, 2019.

**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**

**DUE DATES**

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. 07/18/2019

RTR operators will complete required reading of the above Standing Order 02/28/2019

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. 09/19/2019

Provide closure documentation to NWP Quality Assurance (QA). 09/26/2019

NWP QA, transmit closure documentation to the CBFO. 10/03/2019

**Verification:**

Verified actions to preclude recurrence are acceptable through review of supporting documentation submitted in the CAR 19-060 closure package. The reviewed documentation included the attendance sheet for the required reading of standing order CCP-SO-137 Rev.0, and the revised copy of CCP-TP-053, Rev. 17, CCP Standard Real-Time Radiography (RTR) Inspection Procedure, with an effective date of November 21, 2019.

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#### CLOSURE ACCEPTANCE

Based on the results of the review and verification of the objective evidence included in the CAR 19-060 closure package, it is recommended that CAR 19-060 be closed.

Shelly Martinez  
Evaluation Performed By: Shelly Martinez, SAC

12-18-19  
Date