DATE: JAN 14 2020
REPLY TO ATTN OF: CBFO:OQA:ARS:JM:20-0107:UFC 2300.00

SUBJECT: Acceptance of Closure Documentation for CBFO CARs 19-077 and 19-078 Resulting from Audit A-19-26 AMWTP Recertification

TO: James A. Malmo, DOE-ID

The Carlsbad Field Office (CBFO) has completed its review and verification of completion of the corrective actions associated with CBFO Corrective Action Reports (CARs) 19-077 and 19-078. The CARs resulted from Audit A-19-26, conducted September 23 – 26, 2019. The results of the verification are documented in the attached CAR Continuation Sheets, and indicate that the documentation of completion of corrective actions are acceptable. As a result, these CARs are considered closed.

If you have questions concerning this CAR closure, please contact me at (575) 234-7475.

Anthony R. Stone
Senior Quality Assurance Specialist

Attachment
cc: w/attachment
R. Murray, EM-3.113 ED
G. Sosson, CBFO ED
K. Lachman, CBFO ED
D. C. Gadbury, CBFO ED
D. Miehls, CBFO ED
J. Lopez, CBFO ED
M. Stapleton, CBFO ED
C. Fesmire, CBFO ED
H. Cruickshank, CBFO ED
C. Flohr, DOE-ID ED
T. Jenkins, DOE-ID ED
D. Larsen, DOE-ID ED
D. Pruitt, DOE-ID ED
S. Poling, AMWTP ED
R. Hubler, AMWTP ED
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E. Dumas, AMWTP ED
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J. Walsh, EPA ED
J. Ellis, EPA ED
T. Peake, EPA ED
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K. Pierard, 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
D. Stegman, CTAC ED
P. Hinojos, CTAC ED
G. White, CTAC ED
Site Documents ED
CBFO QA File
CBFO M&RC
*ED denotes electronic distribution
Block #17 & 18  Acceptance of Corrective Action Completion and Closure:


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

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

Verification:
The objective evidence submitted in this closure package was reviewed and verified to meet the required remedial actions commitment. The evidence included Advanced Mixed Waste Treatment Project (AMWTP) real-time radiography (RTR) Bi Annual Training Container Form, AFRTRCON, Rev 2, which incorporates the addition of the waste matrix code (WMC) to the form.

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.

Verification:
The investigative actions, including the impact and extent of condition described in the CAP, were evaluated and found to be acceptable, as documented in CBFO memorandum CBFO:OQA:ARS:JM:19-1093:UFC 2300.00.

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**

**DUE DATES**

Scheduled Completion Date: 11-7-19

**Verification:**
Verified actions to preclude recurrence are acceptable through review of supporting documentation submitted in the CAR 19-077 closure package. The reviewed documentation included TPR-8089, Rev 7, *Real-Time Radiography Examinations (Certification Scans)* procedure, AMWTP TRT Bi Annual Training Container, Rev 2, and the RTR Tailgate briefing and attendance rosters.

**ACCEPTANCE**
Based on the results of the review and verification of the objective evidence included in the CAR 19-077 closure package, it is recommended that CAR 19-077 be closed.

Evaluation Performed By: Shelly Martinez, CTAC

Date: 11/10/20
Block #17 & 18 Acceptance of Corrective Action Completion and Closure:


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

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

Verification:

The objective evidence submitted in this closure packet was reviewed and verified to meet the required remedial actions commitment. The evidence included Advanced Mixed Waste Treatment Project (AMWTP) TPR-8089, Rev 7, Real-Time Radiography Examinations (Certification Scans) procedure, which now includes instructions for completing acceptable knowledge (AK) rework actions.

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.

Verification:

The investigative actions, including the impact and extent of condition described in the CAP, were evaluated and found to be acceptable, as documented in CBFO memorandum CBFO:OQA:ARS:JM:19-1093:UFC 2300.00.

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

Verification:
Verified actions to preclude recurrence are acceptable through review of supporting documentation submitted in the CAR 19-078 closure package. The reviewed documentation included TPR-8089, Rev 7, Real-Time Radiography Examinations (Certification Scans) procedure, and the RTR Tailgate briefing and attendance rosters.

ACCEPTANCE
Based on the results of the review and verification of the objective evidence included in the CAR 19-078 closure package, it is recommended that CAR 19-078 be closed.

Shelly Martinez, CTAC
Evaluation Performed By: 110/2020
Date