



Department of Energy
 Carlsbad Field Office
 P. O. Box 3090
 Carlsbad, New Mexico 88221
 April 08, 2020



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

Subject: Evaluation of the CAP for CBFO CAR 20-016 Resulting from CBFO Audit A-20-09

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) 20-016. As documented on the enclosed CAR Continuation Sheets, the evaluation indicates that the CAP is rejected due to not providing adequate remedial actions or measures to address the extent of the condition noted in CAR 20-016.

The revised CAP for this CAR is due to CBFO Office of Quality Assurance by May 06, 2020.

If you have any questions concerning the evaluation, please contact me at (575) 499-5054.

Sincerely,

Joe Lopez
Digitally signed by Joe Lopez
 DN: cn=us, o=us.government,
 ou=department of energy, ou=Energy
 IT Services, ou=Waste Isolation Pilot
 Plant, ou=People, cn=Joe Lopez
 Date: 2020.04.08 07:28:29 -06'00'

Joe Lopez
 Software Quality Assurance Specialist

Enclosure

cc: w/enclosure

G. Sosson, CBFO *ED
 K. Lachman, CBFO ED
 D. Miehl, CBFO ED
 M. Stapleton, CBFO ED
 C. Fesmire, CBFO ED
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 T. Runyon, CTAC ED
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 C. Castillo, CTAC ED
 R. Castillo, CTAC ED
 K. Hood, CTAC ED
 P. Yanez, CTAC ED
 D. Harvill, CTAC ED
 G. White, CTAC ED

Site Documents
 CBFO QA File
 CBFO M&RC
 *ED denotes electronic distributir





CAR CONTINUATION SHEET

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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) 20-016. The CAP was submitted via Nuclear Waste Partnership LLC (NWP) letter QA:20:00078 UFC:2300.00, dated March 31, 2020, from Mr. D. Ivey, Manager, Quality Assurance, to Mr. J. Lopez, Software Quality Assurance Specialist, CBFO Office of 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

Although not specifically described in CCP-QP-010, the practice of using CCP Document Services processes for managing the review and approvals of Chemical Compatibility Evaluations (CCEs), Acceptable Knowledge Assessments (AKAs) and Basis of Knowledge (BoK) has proven to be efficient and effective. For these reasons, no immediate remedial actions were deemed necessary.

Evaluation:

Not Accepted.

The remedial actions described above are inadequate to address the condition adverse to quality identified in the CAR. The process for review, approval, and control of acceptable knowledge (AK)-generated documents has not been defined in CCP-QP-010. The remedial action does not indicate how the subject reviews will be performed until CCP-QP-010 is revised.

INVESTIGATIVE ACTIONS

An investigation into the circumstances involving the CAR condition revealed that the practice of using CCP Document Services to manage the process for review and approval of CCEs, AKAs and BoKs commenced in June of 2016. Prior to June 2016, required reviews and approvals of these records were managed using memorandums, which quickly became problematic especially when comments received required resolution. To address these difficulties, management elected to use the CCP Document Control process to manage the review and approval process, which has served the program very well. Because CCEs, AKAs and BoKs are resulting "records" of a work activity; in fact, identified as such in CCP-TP-005, CCP Acceptable Knowledge Documentation, it wasn't apparent that they should be subject to the requirements for Document Control, which would be expected for Documents, i.e. "procedures" describing how an activity is performed. For these reasons, the process was not incorporated into procedure CCP-QP-010, CCP Document Services.

Extent of Condition

A review was performed to determine if the same/similar condition exists elsewhere in the program. CCP also practices the same process for managing AK Summary Reports (AKSRs) and has done so for several years. This practice has also served to be a proven and effective means for ensuring their review and approval. However, like CCEs, AKAs and BoKs; AKSRs are records generated as a result of CCP-TP-005; therefore the practice was not instituted in CCP-QP-010.

SCANNED

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CAR CONTINUATION SHEET

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Impact of the Condition

As noted in the investigative section, the practice of using the CCP Document Services process for managing required AK records review and approval has proven to be effective. The practice has demonstrated effective compliance with the review and approval requirements in CCP-TP-005. Therefore the impact of the condition is negligible and does not pose any negative impact on the CCP program.

Evaluation:

Not Accepted.

The investigative actions described above are deemed inadequate to address the condition adverse to quality identified in the CAR. While CCP-TP-005 describes processes to compile and review AK documents, for AKAs and CCEs the procedure instructs to "initiate the review and approval process in accordance to CCP-QP-010." CCP-TP-005 does not instruct to initiate the CCP-QP-010 review and approval process for BoKs. The investigative actions do not indicate how the review and approval process in CCP-QP-010 is adequate when the documents, and the requirements and processes for their review, are not defined in CCP-QP-010. Further, the extent to which other procedures involving AK reviews are affected, e.g., CCP-TP-200, *Enhanced Acceptable Knowledge Review*, has not been addressed.

CAUSAL ANALYSIS

Not required by the CAR.

ACTIONS TO PRECLUDE RECURRENCE

CCP will revise CCP procedure CCP-QP-010 to address the process used when Acceptable Knowledge generated records require review and approval.

COMMITMENTS

DUE DATES

Revise CCP-QP-010, CCP Document Control to address the process used when AK generated records require review and approval.

June 12, 2020

Provide closure documentation to NWP Quality Assurance (QA).

June 18, 2020

NWP QA, transmit closure documentation to the CBFO.

June 25, 2020

Evaluation:

Accepted.

The proposed corrective actions are deemed appropriate to address the conditions documented in the CAR with regard to revising CCP-QP-010, and provide reasonable assurance of precluding the likelihood of recurrence.

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REJECTED

The results of this CAP evaluation indicate that the remedial actions and investigative actions do not satisfactorily address the condition adverse to quality documented in CAR 20-016. Therefore, it is recommended that the CAP for CAR 20-016 be rejected.

Evaluation Performed By: Kathy Hood, CTAC

4/6/2020

Date