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Procedure 12-IH4001:

Procedure WP 12-IH4001, Revision 1 was issued on March 17, 2021. The revision includes criteria for investigation of alarms, assessment of false alarms, invalidating alarms, and provisions for replacement of ToxiRae units that are considered faulty.

As was discussed during the audit, interfering compounds (other than those identified in the ToxiRae Pro User's Guide as cross sensitivity gasses) were discovered as alarms were reported and sources of NO_2 could not be identified. This information was disseminated to all personnel via the Daily Safety Sheet on December 23, 2019 and June 10, 2020. The alarm response actions and expectations of personnel were disseminated to all personnel via the Daily Safety Sheet on October 22, 2020.

The revisions to 12-IH4001 captured the issues listed in CAR 21-012. Review of alarm response, reporting and alarm report documentation indicates that the procedure steps and required documentation are being performed as required.

Although informal guidance and copious discussions with highly trained professionals was relied upon to make decisions, the revised procedure (12-IH4001) will formalize expectations and drive consistency in alarm response and documentation.

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

CAUSAL ANALYSIS
Not Required.

ACTIONS TO PRECLUDE RECURRENCE

An assessment will be performed with lines of inquiry to include compliance with procedure steps, alarm response in the field, and documentation of alarm response actions..

COMMITMENTS	***DUE DATES***
Perform assessment for ToxiRae/NO2 Sampling and Monitoring.	*06/30/2021*
Revision of 12-IH1010	*Complete*
Revision of 12-IH4001	*Complete*
Provide closure documentation to NWP Quality Assurance (QA).	*07/08/2021*
NWP QA, transmit closure documentation to the CBFO.	*07/22/2021*

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Evaluation:
The proposed corrective actions are deemed appropriate to address the conditions documented in the CAR, and provide reasonable assurance of precluding the likelihood of recurrence.

ACCEPTANCE
The results of this CAP evaluation indicate that the remedial actions, investigative actions, and proposed corrective actions satisfactorily address the condition adverse to quality documented in CAR 21-012, and provide adequate measures for precluding recurrence. Therefore, it is recommended that the CAP for CAR 21-012 be approved.

Shelly Gomez
Digitally signed by Shelly Gomez
Date: 2021.04.26 13:18:13 -06'00'

Evaluation Performed By: Shelly Gomez, CTAC _____ Date

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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) 21-013. The CAP was submitted via Nuclear Waste Partnership LLC (NWP) letter QA:21:00063 UFC:2300.00, dated April 15, 2021, from Mr. D. Ivey, Manager, NWP Quality Assurance, to Mr. M. Stapleton, Quality Improvement 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

A meeting will be held to present the details of CAR 21-013 to Industrial Hygiene personnel. This presentation will include records and procedure adherence as well as expectations regarding these subjects. Examples will be provided of what the auditors noted during the audit and examples of properly completed forms.

Evaluation:

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

INVESTIGATIVE ACTIONS

Industrial Hygiene manager reviewed 80 alarm reporting forms for the first quarter of CY 2021. This review was conducted to ensure that all data required for complete documentation of all alarms, regardless of status; and alarms are properly investigated according to the procedure. There were 12 examples of alarm reporting forms that were either incomplete, contained insufficient explanations of alarms/reasons for invalidation of alarms, and had the wrong areas circled (e.g. no instead of yes). Corrected forms will be provided as evidence of completion.

A review of form EA12IH4001-1-0 will be conducted for content and usability improvements.

An assessment will be performed with lines of inquiry to include compliance with procedure steps, alarm response in the field, and documentation of alarm response actions.

A Required Reading with the subject of Procedure Adherence to 12-IH1010 and 12-IH4001will be prepared and disseminated to all Industrial Hygiene personnel. The contents of the required reading will include the following:

A discussion of the Issues from the audit findings and Sr. IH Watch observations such as:

- *Forms (bump form, issue form, and alarm response forms) not being completed properly:*
- *Forms lacking sufficient detail*

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Discussion of the expectations:

- *All forms to be complete, with no blank spaces, initials and signatures where required, and circling the appropriate entry on the form is correct (i.e. yes/no)*
- *The Alarm Response forms being completed the same day of the alarm, in legible handwriting/typewritten, as detailed as possible. The detail to include a full explanation of the alarm Investigation and why (if applicable) the alarm was declared invalid.*
- *Investigation points for each alarm, including possible sources of N02 upwind of an alarm, ventilation in the area, interfering compounds in the area, and other evidence gathered that the alarm is valid or invalid.*

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

CAUSAL ANALYSIS
Not required.

ACTIONS TO PRECLUDE RECURRENCE

A review of form EA12IH4001-1-0 will be conducted for content and usability improvements.

An assessment will be performed with lines of inquiry to include compliance with procedure steps, alarm response in the field, and documentation of alarm response actions.

A Required Reading with the subject of Procedure Adherence to 12-IH1010 and 12-IH4001 will be prepared and disseminated to all Industrial Hygiene personnel.

COMMITMENTS	***DUE DATES***
A meeting will be held to present the details of CAR 21-013 to Industrial Hygiene personnel.	*04/21/2021*
A review of form EA12IH4001-1-0 will be conducted for content and usability improvements.	*05/27/2021*
A Required Reading with the subject of Procedure Adherence to 12-IH1010 and 12-IH4001 will be prepared and disseminated to all Industrial Hygiene personnel.	*06/03/2021*
Provide evidence of alarm form corrections	*06/03/2021*
An assessment will be perfonned with lines of inquiry to include compliance with procedure steps, alarm response in the field, and documentation of alarm response actions.	*07/01/2021*

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Provide closure documentation to NWP Quality Assurance (QA). *07/15/2021*

NWP QA, transmit closure documentation to the CBFO. *07/29/2021*

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 21-013, and provide adequate measures for precluding recurrence. Therefore, it is recommended that the CAP for CAR 21-013 be approved.

Shelly Gomez Digitally signed by Shelly Gomez
Date: 2021.04.26 13:29:56 -06'00'

Evaluation Performed By: Shelly Gomez for Nathan Denney, CTAC Date