

**Department of Energy**  
Carlsbad Field Office  
P. O. Box 3090  
Carlsbad, New Mexico 88221  
June 24, 2021

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

**Subject:** Contract DE-EM0001971, NWP- Verification and Acceptance of Completion of Corrective Actions for CAR 21-011 from Audit A-21-14

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) 21-011, which resulted from CBFO Audit A-21-14 of the Nuclear Waste Partnership (NWP) LLC Central Characterization Program (CCP) for the Quality Assurance Program on March 2 – 4, 2021. The results of the verification are documented on the enclosed CAR Continuation Sheets, and indicate that the documentation of completion of corrective actions is acceptable. As a result, CAR 21-011 is considered closed.

This letter provides technical direction only in accordance with the Technical Direction Clause (H.10) of the contract and may not be construed to constitute a change to the contract. Any questions concerning allowability under, or changes to, the contract must be resolved by Ms. Wendy Bauer, CBFO Contracting Officer (CO) at (208) 351-4638 prior to your proceeding in any manner that might obligate the Government beyond the existing contract.

If you have any questions concerning the CAR, please contact Mr. Joe Lopez, CBFO Office of Quality Assurance at (575) 499-5054. For all other questions, please contact myself at (575) 706-0046.

Sincerely,

**DONALD**  
**GADBURY**

Digitally signed by  
DONALD GADBURY  
Date: 2021.06.24  
14:26:37 -06'00'

Donald C. Gadbury, Director  
Office of Program Management  
Carlsbad Field Office

Enclosure

cc: w/enclosure  
R. Knerr, CBFO ED  
M. Bollinger, CBFO ED  
K. Princen, CBFO ED  
M. Brown, CBFO ED  
D. Jolley, CBFO ED  
W. Bauer, CBFO ED  
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P. Hinojos, CTAC ED  
G. White, CTAC ED  
S. Sifuentes, SNL ED  
Site Documents ED  
CBFO M&RC ED  
CBFO QA File

\*ED denotes electronic distribution

### CAR CONTINUATION SHEET

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**Blocks #17 & #18 Acceptance of Corrective Action Completion and Closure:**

The Carlsbad Field Office (CBFO) has reviewed the closure package for Corrective Action Report (CAR) 21-011, including objective evidence and supporting documentation, submitted via Nuclear Waste Partnership LLC (NWP) letter QA:21:00094 UFC:2300.00, dated May 26, 2021, from Mr. D. Ivey, Manager, NWP Quality Assurance, to Mr. J. Lopez, Software 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**

*Both the operator and the Vendor Project Manager (VPM) were counseled on the expectations for ensuring that all minimum required entries are made and that proper time be taken to perform weekly Operational Logbook (OLB) reviews to verify required entries.*

**Verification:**

The objective evidence submitted in this closure package was reviewed and verified to meet the required remedial actions commitment.

**INVESTIGATIVE ACTIONS**

*The active OLBs for all processes and equipment at ORNL were reviewed to verify safety walk-downs were recorded, where required, for each operational day. Since the CAR condition dealt with the inactive 2020 OLB for the IQ3, the 2020 OLB (CCP-CH-ORNL-NDA-MILCC-04) for the other NDA unit at ORNL was also reviewed. During discussions, the operator involved with the lacking entries stated that the required safety walk-downs are always performed and that the lack of walk-down entries was merely an oversight; not a lack of understanding of the requirements for minimum daily entries. The VPM also stated that he understood the requirements for recording safety walk-downs; however he had overlooked the missing entries during his review.*

**Extent of Condition**

*During the review of the OLBs mentioned above, there were four other instances of omitted entries. These instances, involving the same operator, were identified in OLB CCP-CH-ORNL-NDA-MILCC-04. With the exception of the lacking entries noted in the CAR and the four additional instances identified in the MILCC OLB, there were no further instances identified. Since, the affected logbooks are inactive and have been submitted to CCP Project Records for retention, it was determined that any corrections would not provide an appreciable benefit, therefore no corrections were made.*

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Impact of the Condition

As previously stated, interviews with the NDA operators revealed that safety walk-downs are always performed prior to starting operations and the omitted entries as noted in the CAR condition and the additional instances identified during the extent-of-condition review were merely oversights by the operator and VPM during reviews. CCP-PO-005, Rev. 30, Section 13.0 states, "The OLB provides an accurate narrative log of the history and status of the facility operation." CCP uses OLBs to recreate the events of an operational day, especially when investigating abnormal operational conditions such as safety concerns and equipment problems when encountered. The investigation did not reveal any abnormal operational instances having been experienced. Since there were no safety concerns on the applicable days the safety walk-down entries were omitted, there is negligible impact on the program.

**Verification:**

The investigative actions described above were evaluated and found to be acceptable, as documented in CBFO CAP acceptance memorandum CBFO:OQA:JL:JM:21-0148:UFC 2300.00.

**CAUSAL ANALYSIS**

*Not required for this CAR.*

**ACTIONS TO PRECLUDE RECURRENCE**

*Develop a briefing for all CCP Operations personnel emphasizing the importance of proper log keeping, minimum daily entries and weekly reviews by the VPM as required by CCP-PO-005.*

**COMMITMENTS**

**DUE DATES**

<i>Counsel the NDA Operator and VPM involved in the omitted entries.</i>	<i>Complete</i>
<i>Develop and present a briefing to all operators and VPMs on minimum daily logbook entries and weekly reviews by the VPM as required by CCP-PO-005.</i>	<i>05/13/2021</i>
<i>Provide closure documentation to NWP Quality Assurance (QA).</i>	<i>05/20/2021</i>
<i>NWP QA, transmit closure documentation to the CBFO.</i>	<i>05/27/2021</i>

**Verification:**

Verified actions to preclude recurrence are acceptable through review of objective evidence and supporting documentation submitted in the CAR 21-011 closure package. The reviewed documentation included an email statement of the counselling of the VPM and NDA operators on the minimum daily logbook entry requirements per CCP Conduct of Operations procedure. Also included was the presentation for Operational Logbook Minimum Daily Entries CBFO CAR 21-011 and CCP Training Attendance Sheets for CCP VPMs and Operators.


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#### CLOSURE ACCEPTANCE

Based on the results of the review and verification of the objective evidence included in the CAR 21-011 closure package, it is recommended that CAR 21-011 be closed.

PRISCILLA YANEZ  
(Affiliate)

 Digitally signed by PRISCILLA YANEZ (Affiliate)  
Date: 2021.06.07 16:05:29 -06'00'

Evaluation Performed By: Priscilla Yanez, CTAC

\_\_\_\_\_ Date