

United States Government

Department of Energy

memorandum

Carlsbad Field Office
Carlsbad, New Mexico 88221**DATE:** February 07, 2022**REPLY TO**
ATTN OF: CBFO:QAD:JL:JM:22-0131:UFC 2300.00**SUBJECT:** Evaluation of the Revised CAP for CBFO CAR 22-001**TO:** Mr. Douglas Pruitt, Department of Energy -Idaho

The Carlsbad Field Office (CBFO) has completed its evaluation of the revised Corrective Action Plan (CAP) associated with CBFO Corrective Action Report (CAR) 22-001. As documented in the attached CAR Continuation Sheet, the evaluation indicates that the revised CAP is accepted.

If you have any questions concerning the evaluation of the revised CAP, please contact me at (575) 200-0716.

Joe
Lopez

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by Joe Lopez
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Joe Lopez,
Senior Quality Assurance Specialist
Quality Assurance Division
Carlsbad Field Office

Attachment

220204

cc: w/attachment

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R. Toro, EM-3.113	ED	R. Lee, NWP/CCP	ED
R. Knerr, CBFO	ED	B. Pace, NWP/CCP	ED
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K. Princen, CBFO	ED	J. Harvill, NWP/CCP	ED
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M. Stapleton, CBFO	ED	C. Simmons, NWP/CCP	ED
D. Foreman, CBFO	ED	M. Grenfell, NWP/CCP	ED
D. Bamber, CBFO	ED	J. Carter, NWP/CCP	ED
M. Toothman, CBFO	ED	D. Ivey, NWP/QA	ED
A. Walker, CBFO	ED	V. Ballew, NWP/QA	ED
H. Cruickshank, CBFO	ED	K. Gentry, NWP/QA	ED
D. Smith, CBFO	ED	A. Boyea, NWP/QA	ED
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A. Morse, AMWTP	ED	P. Yanez, CTAC	ED
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S. Dunagan, NWP	ED	G. White, CTAC	ED
S. Strong, NWP	ED	W. Price, CTAC	ED
		Site Documents	ED
		S. Sifuentes, SNL	ED
		CBFO M&RC	ED
		CBFO QA File	

*ED denotes electronic distribution

CAR CONTINUATION SHEET

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Block #16 Acceptance of Proposed Corrective Actions:

An evaluation was performed of the revised Corrective Action Plan (CAP) developed to address Carlsbad Field Office (CBFO) Corrective Action Report (CAR) 22-001. The revised CAP was submitted via Department of Energy, Idaho Operations Office transmittal letter CLN220649, dated January 31, 2022, from Mr. Douglas M. Pruitt, Acting Assistant Manager, Environment and Waste Programs, to Mr. Joe Lopez, Senior Quality Assurance Specialist, Department of Energy, Carlsbad Field Office.

Italicized text, taken verbatim from the revised CAP, is used to reflect the correlation between the actions required by the CAR and the method used for evaluation.

REMEDIAL ACTIONS

None. The issues identified in CAR 22-001 do not nullify or vacate necessary details of the completed forms.

Evaluation:

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

INVESTIGATIVE ACTIONS

1. *The RTR Bi-Annual Training Container form (AFRTRCON) is a form laid out in tabular format. Historically if one cell in a row was identified as not applicable, it was understood that other cells in that row were also not applicable but were not marked as such. As a result, previously completed forms will have this issue.*

2.
 - a) *The issue identified in association with Acceptable Knowledge Resolution (AKR)-21-950 Checklist was the only example identified of 86 AKRs reviewed out of a total population of 868 AKRs.*

 - b) *The issues identified in association with IN210007 was on the Driver/Vehicle Inspection Report and on the Package Shipping Checklist. The Driver/Vehicle Inspection Report is completed by the Waste Isolation Pilot Plant (WIPP) contracted shipping company, CAST Specialty Transportation Inc., personnel using their procedures. The Package Shipping Checklist, FRM-2103, is completed by Fluor Idaho personnel as directed in implementing procedure MCP-4011 (Waste Receipt and Shipping Inspection). Review of 12 of the 111 WIPP shipments made to date in 2021 identified one additional shipment package where an additional issue was identified. For shipment IN210045, the Driver/Vehicle Inspection Report was identified as having no lineout or date on a correction made at the top of the page. Procedure MCP-4011 currently includes requirements for completeness in association with completion of FRM-2103; however, the Driver/Vehicle Inspection Report is generated by WIPP contracted personnel. The AMWTP does not have access to the shipping company procedures nor control over the completion of the shipping companies form by their personnel.*

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c) The issue identified in conjunction with FRM-241.98 (Electronic Recordkeeping System Questionnaire) was in association with the Polytron Version Control Software (PVCS). This software is used for controlling versions of software applications but does not generate any records. The FRM-241.98 for PVCS was completed one time for the electronic system, and there are no other examples of this issue in association with PVCS.

After performing the investigate actions described above, it was determined that the issues identified do not nullify or vacate necessary details of the completed forms and there is no impact to the AMWTP CH TRU Waste Program.

Evaluation:

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

CAUSAL ANALYSIS

Not Required by the CAR.

ACTIONS TO PRECLUDE RECURRENCE

1. *Revise TPR-8089 to include additional details concerning completion of the RTR Bi-Annual Training Container form.*
2. *Perform RTR operator training for the applicable procedural changes associated with completion of the RTR Bi-Annual Training Container form.*
3. *Perform training of qualified Acceptable Knowledge Experts concerning appropriate completion of checklists.*
4. *Perform training of qualified AMWTP WIPP shipping personnel concerning appropriate completion of WIPP shipping paperwork.*
5. *Complete training of qualified Records personnel concerning appropriate completion of FRM-241.98.*

COMMITMENTS

DUE DATES

<i>Revise TPR-8089</i>	<i>February 28, 2022</i>
<i>Perform RTR operator training</i>	<i>February 28, 2022</i>
<i>Perform training of qualified AKE's</i>	<i>February 28, 2022</i>
<i>Perform training of qualified AMWTP WIPP shipping personnel</i>	<i>February 28, 2022</i>
<i>Complete training of qualified Records personnel</i>	<i>February 28, 2022</i>

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Evaluation:

The proposed corrective actions are deemed appropriate to address the condition documented in the CAR. This will provide reasonable assurance of precluding the likelihood of recurrence.

ACCEPTANCE

The results of the evaluation of the revised CAP indicate that the remedial actions, investigative actions, and proposed corrective actions satisfactorily address the condition adverse to quality documented in CAR 22-001, and provide adequate measures for preventing recurrence. Therefore, it is recommended that the revised CAP for CAR 22-001 be approved.

PRISCILLA

YANEZ (Affiliate)

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YANEZ (Affiliate)
Date: 2022.02.07 09:02:14 -07'00'

Evaluation Performed By: Prissy Yanez, CTAC

_____ Date