



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

February 23, 2022

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

Subject: Contract DE-EM0001971 - Verification and Acceptance of Corrective Actions for
CBFO CAR 21-018 Resulting from CBFO Audit A-21-17

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) 21-018, which resulted from Audit A-21-17. The results of the verification are documented in the enclosed CAR Continuation Sheets, and indicate that the documentation of completion of corrective actions is acceptable. The subject CAR 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 (575) 361-0008, prior to your proceeding in any manner that might obligate the Government beyond the existing contract.

If you have any questions, please contact Mr. Joe Lopez, CBFO Quality Assurance Division at (575) 200-0716. For all other questions, please contact myself at (575) 361-4788.

Sincerely,

KY

Craft Jr.

Digitally signed
by KY Craft Jr.
Date: 2022.02.23
12:11:32 -07'00'

K. Y. Craft, Jr.
Alternate Contracting Officer's Representative
Carlsbad Field Office

Enclosure

cc: w/enclosure

J. Lorence, EM-3.113	*ED	T. Groover, NWP	ED
R. Toro, EM-3.113	ED	J. Harvill, NWP	ED
R. Knerr, CBFO	ED	L. Turner, NWP	ED
M. Bollinger, CBFO	ED	K. Gentry, NWP	ED
K. Princen, CBFO	ED	J. Carter, NWP	ED
D. Jolley, CBFO	ED	B. Pace, NWP	ED
W. Bauer, CBFO	ED	S. Saiz, NWP	ED
M. Stapleton, CBFO	ED	V. Ballew, NWP	ED
J. Lopez, CBFO	ED	A. Boyea, NWP	ED
H. Cruickshank, CBFO	ED	M. Gonzales, NWP	ED
A. Walker, CBFO	ED	R. Taylor, NWP	ED
M. Toothman, CBFO	ED	J. Ellis, EPA	ED
D. Bamper, CBFO	ED	T. Peake, EPA	ED
D. Foreman, CBFO	ED	E. Feltcorn, EPA	ED
D. Smith, CBFO	ED	R. Shean, NMED	ED
M. Luckey, CBFO	ED	R. Maestas, NMED	ED
W. Iqbal, CBFO	ED	D. Biswell, NMED	ED
M. Mikolanis, EM-LA	ED	M. McLean, NMED	ED
D. Nickless, EM	ED	S. Kopp, CTAC	ED
R. Bryant, EM	ED	W. Ledford, CTAC	ED
E. Gammon, EM-LA	ED	R. Castillo, CTAC	ED
L. Brauw, EM-LA	ED	S. Gomez, CTAC	ED
L. Bishop, EM-LA	ED	J. Maupin, CTAC	ED
J. Shaffer, EM-LA	ED	P. Gomez, CTAC	ED
T. Wyka, DOE/NA-LA	ED	C. Castillo, CTAC	ED
P. Maggiore, DOE/NA-LA	ED	P. Hinojos, CTAC	ED
J. Sanchez, DOE/NA-LA	ED	P. Martinez, CTAC	ED
T. Wald, DOE/NA-LA	ED	G. White, CTAC	ED
D. Rodriguez, DOE/NA-LA	ED	S. Sifuentes, SNL	ED
A. Nash, DOE/NA-LA	ED	Site Documents	ED
M. Pinzel, DOE/NA-LA	ED	emla.docs@em.doe.gov	ED
S. Dunagan, NWP	ED	CBFO M&RC	ED
S. Strong, NWP	ED	CBFO QA File	
K. Stone, NWP/CCP	ED		
R. Lee, NWP/CCP	ED		

*ED denotes electronic distribution

CAR CONTINUATION SHEET

1. CAR No: 21-018

2. Activity No: A-21-17

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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) 21-018, including objective evidence and supporting documentation, submitted via Nuclear Waste Partnership LLC (NWP) letter CO:22:02929 UFC:4250.00, dated February 15, 2022, from Ms. M. P. Gonzales, Manager Project Services, to Ms. W. Bauer, Contracting Officer, CBFO Office of Business Operations.

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 and verification of closure.

REMEDIAL ACTIONS

CCP-SO-151 was issued to clarify steps 4.1.6 and 4.2.11 in CCP-TP-028, Rev. 12 pertaining to the contents of training drums; specifically that there be internal containers with various amounts of liquids as described in step 4.1.2.

Verification:

The remedial actions were evaluated and found to be acceptable, as documented in CBFO CAP acceptance letter CBFO:OQA:JL:JM:21-0190:UFC 2300.00, dated July 15, 2021.

INVESTIGATIVE ACTIONS

Extent-of-Condition

The VPMs who built training container NDE-Training-126 were interviewed to determine why only one container with liquid was included in the training drum, instead of multiple internal containers with various amounts of liquid as described in step 4.1.2. The VPMs stated that the procedural steps 4.1.6 and 4.2.11, in which items are loaded into the training container, do not mention various amounts of liquid, only containers of various sizes. When training containers are built at ORNL, the VPMs gather the material to be used in the training container (in accordance with step 4.1.2) and take it to the area where the container is to be built. The materials include waste stream specific items, prohibited items, and containers of various sizes with varying amounts of liquid. When the training container is physically built (steps 4.1.6 and 4.2.11) the VPMs determine which of the materials they brought will be placed in the container. These steps do not mention containers of varying amounts of liquids.

A review of previous training containers built in the past year revealed that two additional training containers, NDE-TRAINING-116 and NDE-TRAINING-127, only had one internal container with liquid. All other training containers reviewed were found to have multiple internal containers with varying amounts of liquid.

Impact-of-the-Condition

The operators who ran training containers NDE-TRAINING-116 and NDE-TRAINING-127 successfully identified the internal container with liquid, as well as the other prohibited items within the drums. There

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is no reason to suspect that a second internal container with liquid would have changed the results of the training containers, therefore, there is no programmatic impact from this condition.

Verification:

Investigative actions were evaluated and found to be acceptable, as documented in CBFO CAP acceptance letter CBFO:OQA:JL:JM:21-0190:UFC 2300.00, dated July 15, 2021.

CAUSAL ANALYSIS

Not Required by the CAR.

ACTIONS TO PRECLUDE RECURRENCE

CCP-TP-028 will be revised to incorporate CCP-SO-151 (Remedial Action), which will clarify procedural steps 4.1.6 and 4.2.11 to ensure that each training container built has multiple internal containers with varying amounts of liquid.

COMMITMENTS

- *Issue Standing Order to clarify CCP-TP-028.*
- *Revise CCP-TP-028.*
- *NDE Cognizant Engineer brief VPMs on revised CCP-TP-028.*
- *Provide closure documentation to NWP Quality Assurance*
- *NWP Quality Assurance, transmit closure document to the CBFO*

DUE DATES

Complete
Complete
12/16/2021
12/27/2021
01/04/2022

Verification:

Verified actions to preclude recurrence are acceptable through review of objective evidence and supporting documentation submitted in the CAR 21-018 closure package. The reviewed documentation included the following:

- The issuance of CCP Standing Order number CCP-SO-151, Rev. 0, titled Clarification of Internal Containers of Various Sizes for Radiographic Training Container Construction.
- The issuance of Revision 13 of CCP-TP-028, *CCP Radiographic Training Container Construction*, dated 01/10/2022 indicating changes made to the procedure in sections 4.1.2, 4.1.5, 4.2.7, and 4.2.10.
- CCP Training Attendance Sheets for the mentioned procedure.

CLOSURE ACCEPTANCE

Based on the results of the review and verification of the objective evidence included in the CAR 21-018 closure package, it is recommended that CAR 21-018 be closed.

PAUL GOMEZ (Affiliate)

Digitally signed by PAUL GOMEZ
(Affiliate)
Date: 2022.02.17 01:01:56 -07'00'

Verification Performed By: Paul Gomez, CTAC

Date