



Department of Energy
Carlsbad Field Office
P. O. Box 3090
Carlsbad, New Mexico 88221
July 18, 2022

Ms. Marty Gonzales, Manager
Project Services
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 22-022, Resulting from Audit A-22-06, NWP Contact-Handled Waste Handling Activities

Dear Ms. Gonzales:

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) 22-022, which resulted from Audit A-22-06. 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 allow-ability under, or changes to, the contract must be resolved by Mr. Daniel Burke, CBFO Contracting Officer, 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. Mike Stapleton, CBFO Quality Assurance Specialist, at (814) 421-3322. For all other questions, please contact myself at (575) 361-4788.

Sincerely,

**KY Craft
Jr.**

Digitally signed
by KY Craft Jr.
Date: 2022.07.14
16:56:17 -06'00'

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

Enclosure

cc: w/enclosure

R. Knerr, CBFO	* ED
M. Bollinger, CBFO	ED
E. Garza, CBFO	ED
D. Burke, CBFO	ED
D. Jolley, CBFO	ED
J. Lopez, CBFO	ED
J. Montemayor, CBFO	ED
J. Biesecker, CBFO	ED
D. Dalton, CBFO	ED
S. Dunagan, NWP	ED
K. Stone, NWP	ED
C. Lockhart, NWP	ED
M. Percy, NWP	ED
R. Taylor, NWP	ED
S. Strong, NWP	ED
D. Ivey, NWP	ED
V. Ballew, NWP	ED
S. Saiz, NWP	ED
A. Boyea, NWP	ED
K. Sterling, NWP	ED
G. Chism, NWP	ED
J. McCormick, NWP	ED
D. Frederici, NWP	ED
M. Hendrickson, NWP	ED
R. Shean, NMED	ED
R. Maestas, NMED	ED
D. Biswell, NMED	ED
M. McLean, NMED	ED
S. Kopp, CTAC	ED
W. Ledford, CTAC	ED
R. Castillo, CTAC	ED
S. Gomez, CTAC	ED
T. Boswell, CTAC	ED
D. Stegman, CTAC	ED
C. Castillo, CTAC	ED
P. Hinojos, CTAC	ED
D. Harvill, CTAC	ED
G. White, CTAC	ED
J. Maupin, CTAC	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

1. CAR No: 22-022	2. Activity No: A-22-06	3. Page 1 of 2
-------------------	-------------------------	----------------

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

The Carlsbad Field Office (CBFO) has reviewed the closure package for amended Corrective Action Report (CAR) 22-022, including objective evidence and supporting documentation, submitted via Nuclear Waste Partnership LLC (NWP) letter CO:22:03001 UFC:4250.00, dated May 11, 2022, from Ms. M. P. Gonzales, NWP Manager of Project Services to Mr. Daniel Burke, CBFO Contracting Officer.

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

Review WP 05-WH1402, Rev 24, 13-Ton Electric Forklifts. Review 41-H-012F logbook to identified date that the oil leak was identified.

Verification:

The remedial actions were evaluated and found to be acceptable, as documented in CBFO CAP acceptance letter CBFO:QAD:MS:JM:22-0156:UFC 2300.00, dated March 14, 2022.

INVESTIGATIVE ACTIONS

The Waste Handling Manager was unable to locate an issue notice associated with 41-H-012F during the review of Devonway.

The 41-H-012F logbook entry identifying the battery and tire issues on 12/3/2021 was noted. The Waste Handling personnel interviews determined that the leak was identified after the preoperational inspection for the work package and did not notify the SEC as the forklift had been tagged out of service for the same leak dating back to 2019. Thus they did not write an issue noticed documenting the situation.

WP 05-WH1402, Rev 24, 13-Ton Electric Forklifts states to call SEC and write an issue notice if the preoperational inspection failed or was unsatisfactory. The procedure needs to be revised to clarify when to contact SEC and write an issue notice.

Develop and conduct briefing on expectation to write an issue notice for every time an inspection is determined to be failed or was unsatisfactory per WP 05-WH1402 section 5.1.2[D].

IMPACT

No impact was identified that impacted the performance of the procedure.

EXTENT OF CONDITON

A review of Devonway identified that Issue Notices were not consistently being written for Waste Handling equipment that failed or was unsatisfactory during an inspection performance check. This may be due to not having a standardized format to submit the Issue Notices so that they could be easily identified.

Verification:

The remedial actions were evaluated and found to be acceptable, as documented in CBFO CAP acceptance letter CBFO:QAD:MS:JM:22-0156:UFC 2300.00, dated March 14, 2022.

CAR CONTINUATION SHEET

1. CAR No: 22-022	2. Activity No: A-22-06	3. Page 2 of 2
--------------------------	--------------------------------	-----------------------

CAUSAL ANALYSIS

A Causal Analysis is not required.

ACTIONS TO PRECLUDE RECURRENCE

Revise WP 05-WH1402, Rev 24, 13-Ton Electric Forklifts to clarify when to contact SEC and write an issue notice for any failed or unsatisfactory inspection.

Develop and conduct briefing on expectation to write an issue notice for inspections that are determined to be failed or was unsatisfactory per WP 05-WH1402 section 5.1.2[D].

COMMITMENTS

DUE DATES

Revise WP 05-WH1402, Rev 24, 13-Ton Electric Forklifts to clarify when to contact SEC and write an issue notice for any failed or unsatisfactory inspection. 03/10/2022

Develop briefing on expectation to write an issue notice for every time an inspection is determined to be failed or was unsatisfactory per WP 05-WH1402 section 5.1.2[D]. 03/10/2022

Conduct briefing on expectation to write an issue notice for every time an inspection is determined to be failed or was unsatisfactory per WP 05-WH1402 section 5.1.2[D]. 04/21/2022

Provide closure documentation to NWP Quality Assurance (QA). 05/05/2022

NWP QA, transmit closure documentation to the CBFO. 05/19/2022

Verification:

Actions to preclude recurrence and commitments were deemed acceptable through review of the objective evidence submitted in the CAR 22-022 closure package. The reviewed documentation included a new revision (25) of procedure WP 05-WH1402, *13-Ton Electric Forklifts*, dated 4/27/2022 as well as the briefing for the new management control procedure, WP 05-WH1801, Revision 0, *Waste Handling Equipment Preoperational Requirements*, and the training attendance sheet for the briefing dated 5/10/2022.

CLOSURE ACCEPTANCE

Based on the results of the review and verification of the objective evidence included in the CAR 22-022 closure package, it is recommended that CAR 22-022 be closed.

Shelly Gomez

Digitally signed by Shelly Gomez
Date: 2022.07.14 10:39:06 -06'00'

7/14/2022

Verification Performed By: Shelly Gomez, CTAC

Date