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Department of Energy
Carlsbad Field Office
P. O. Box 3090
Carlsbad, New Mexico 88221
MAY 09 2017



Ms. Mary McDaniel, Manager
Quality and Contractor Assurance
Nuclear Waste Partnership LLC
P.O. Box 2078
Carlsbad, NM 88221-2078

Subject: Evaluation of the Proposed CAP for CBFO CAR 17-015 Resulting from Audit A-17-05

Dear Ms. McDaniel:

The Carlsbad Field Office (CBFO) has evaluated the Corrective Action Plan (CAP) provided to address Corrective Action Report (CAR) 17-015, which resulted from Audit A-17-05 of the Nuclear Waste Partnership LLC (NWP) Waste Isolation Pilot Plant (WIPP) Industrial Safety Air Quality Monitoring Program. The audit was conducted January 24 – 26, 2017 at the WIPP. The results of the evaluation are provided in the enclosed CAR Continuation Sheets.

The results of the evaluation indicate that the CAP for CAR 17-015 does provide adequate measures to address the impact/extent and reduce the likelihood of recurrence of the conditions noted in the CAR. However, to accept the CAP, the timeline for comments must be adjusted in order to provide closure documentation to the CBFO Office of Quality Assurance by August 30, 2017. Please provide a revised CAP with new commitment dates.

If you have any questions concerning the CAP evaluation, please contact me at (575) 234-7483.

Sincerely,

Martin P. Navarrete
Senior Quality Assurance Specialist

Enclosure

cc: w/enclosure

M. Brown, CBFO	* ED
D. Miehls, CBFO	ED
E. Garza, CBFO	ED
R. Elmore, CBFO	ED
M. Heard, CBFO	ED
J. Britain, NWP	ED
B. P. Shagula, NWP	ED
V. Ballew, NWP	ED
S. Punchios, NWP	ED
A. Boyea, NWP	ED
J. Ellis, EPA	ED
J. Walsh, EPA	ED
T. Peake, EPA	ED

J. Kieling, NMED	ED
R. Maestas, NMED	ED
D. Biswell, NMED	ED
P. Martinez, CTAC	ED
C. Castillo, CTAC	ED
M. Leroch, CTAC	ED
P. Yanez, CTAC	ED
J. Vernon, CTAC	ED
J. Fernandez, CTAC	ED
P. Hinojos, CTAC	ED
G. White, CTAC	ED
CBFO QA File	
CBFO M&RC	

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CAR CONTINUATION SHEET

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2. Activity No: A-17-05

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Block 15 Acceptance of Proposed Corrective Actions

An evaluation was performed of the Corrective Action Plan (CAP) developed to address the Carlsbad Field Office (CBFO) Corrective Action Report (CAR) 17-015. The CAP was submitted to Martin Navarrete, Senior Quality Assurance Specialist, via Nuclear Waste Partnership LLC (NWP) transmittal QA:17:00142, dated April 26, 2017 from Ms. Mary McDaniel, Manager, Quality and Contractor 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:

- *Provide a clear statement in WP 12-IH1007, Personal Sampling Pump Calibration, and WP 12-IH1828, MSHA Air Quality Monitoring whether IH equipment requires MSHA approval labels or logos.*

Investigative Actions:

During the investigation, it was determined that Gillian air pumps are specifically referenced in MSHA Metal/Nonmetal Health Inspection Procedures Handbook PH06-IV-1, chapter 4. Also, 30 CFR part 56, 57, 58 were reviewed for further guidance and it was determined that it is not a requirement for air sample pumps used in Metal/Non-metal mines to have MSHA approval stickers.

The Condition Adverse to Quality (CAQ) was determined to be inaccurate instructions/requirements. Although there is no regulatory requirement for the Gillian pumps to bear the MSHA approval label, this requirement is not clearly stated in the IH program documents

A rapid expansion in the IH sampling and monitoring capabilities throughout 2016 caused the CAQ to occur. There is no impact to the overall IH department due to equipment designations or labeling.

Root Cause:

Not required.

Apparent Cause A4B1C04

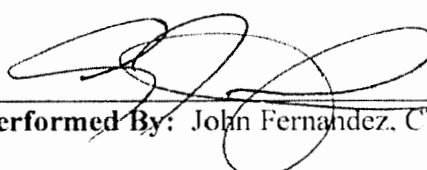
Management follow-up or monitoring of activities did not identify problems

Action(s) to Preclude Recurrence:

Procedural guidance or a definition will be added to WP 12-IH1007, Personal Sampling Pump Calibration, and WP 12-IH1828, MSHA Air Quality Monitoring that clearly specifies which sampling and monitoring equipment is required to bear the MSHA approval label.

CAR CONTINUATION SHEET

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Commitments	Due Dates
<i>Provide guidance in WP 12-IH1007, Personal Sampling Pump Calibration, and WP 12-IH1828, MSHA Air Quality Monitoring stating the requirements for MSHA labels on the IH AIR PUMP sampling equipment.</i>	07/25/17
<i>Provide a Management Assessment to assure that instruments are labeled in accordance with WP 12-IH1007, Personal Sampling Pump Calibration, and WP 12-IH1828, MSHA Air Quality Monitoring.</i>	09/13/17
<i>Provide closure documentation to NWP Quality Assurance.</i>	10/04/17
<i>NWP QA, transmit closure documentation to the CBFO.</i>	10/18/17
Evaluation: The remedial actions, investigative actions and actions to preclude recurrence described above are sufficient to address the conditions adverse to quality. The remedial action is to provide a clear statement in WP 12-IH1007, <i>Personal Sampling Pump Calibration</i> , and WP 12-IH1828, <i>MSHA Air Quality Monitoring</i> and determine whether IH equipment requires MSHA approval labels or logos is acceptable.	
Acceptance: The results of the evaluation of the CAP indicate that the investigative actions and extent/impact are sufficient to address conditions adverse to quality documented in the CAR. Therefore, it is recommended that the CAP for CAR 17-015 be accepted.	
 Evaluation Performed By: John Fernandez, CTFAC	<u>5/2/17</u> Date