



United States Government

Department of Energy

memorandum

Carlsbad Area Office
Carlsbad, New Mexico 88221**DATE:** January 4, 2000**REPLY TO
ATTN OF:** CAO:QA:SAV 00-0200 UFC 2300**SUBJECT:** Issuance of Corrective Action Reports (CARs) 00-009 Through 00-011**TO:** Joseph A. Legare, RFFO

The Carlsbad Area Office (CAO) performed Audit A-00-08 of the Rocky Flats Environmental Technology Site (RFETS) on December 13-17, 1999. The audit team identified three conditions adverse to quality which have been documented in CARs 00-009 through 00-011.

Please document on the enclosed CAR Continuation Sheet your proposed corrective actions and a schedule for completion and forward to me prior to the response due date identified in CAR Block 14. If corrective action cannot be determined or completed prior to the response due date, please notify me via letter.

If you have any questions or comments, please contact me at (505) 234 -7423.

Samuel A. Vega
Quality Assurance Manager

Attachments

000101



Joseph E. Legare

- 2 -

January 4, 2000

cc w/original attachments:

L. Chism, CAO

cc w/attachments:

B. Bennington, CAO

B. Stroud, CAO

S. Vega, CAO

D. Winters, DNFSB

B. Walker, EEG

M. Eagle, EPA

S. Monroe, EPA

✓ S. Zappe, NMED

M. Castagneri, RFETS

J. O'Leary, RFETS

J. Schuetz, CTAC

C. Riggs, CTAC

S. Kouba, WID

W. Most, WID

JAN 2000
RECEIVED

CORRECTIVE ACTION REPORT

1. CAR No.: 00-009	2. Activity Report No.: A-00-08	3. Page <u>1</u> of <u>2</u>						
4. Controlling Document: 95-QAPjP-0050, Program Quality Assurance Project Plan	5. CAO Assessment Team Leader: Samuel Vega							
6. Responsible Organization: RFETS TRU Project	7. CAQ Was Discussed With: Charley Turner Mark Castagneri							
8. Requirement that was violated: See Continuation Sheet								
9. Condition Adverse to Quality: See Continuation Sheet								
10. Suggested Actions (Optional):								
11a. Significant CAQ (Yes or No): YES 11b. Work Suspension Recommended (Yes or No): NO 11c. RCRA-Related (Yes or No): YES								
12. Types of Actions: Remedial: <input checked="" type="checkbox"/> Investigative: <input checked="" type="checkbox"/> Root Cause: <input checked="" type="checkbox"/> Actions to Preclude Recurrence: <input checked="" type="checkbox"/>								
13. CAR Initiator: <u>T. Greenwood</u> Date: <u>12/17/99</u>								
14. Response Due Date: <u>01/10/2000</u> Corrective Action Plan Required: YES								
15. Concurrence: <table style="width: 100%; border: none;"> <tr> <td style="width: 33%; text-align: center; vertical-align: bottom;"> <u>Samuel Vega</u> <small>Assessment Team Leader</small> </td> <td style="width: 33%; text-align: center; vertical-align: bottom;"> <u>12/22/99</u> <small>Date</small> </td> <td style="width: 33%; text-align: center; vertical-align: bottom;"> <u>N/A</u> <small>Responsible Assistant Manager</small> </td> </tr> <tr> <td style="width: 33%; text-align: center; vertical-align: bottom;"> <u>Samuel Vega</u> <small>Quality Assurance Manager</small> </td> <td style="width: 33%; text-align: center; vertical-align: bottom;"> <u>12/22/99</u> <small>Date</small> </td> <td style="width: 33%; text-align: center; vertical-align: bottom;"> <small>Date</small> </td> </tr> </table>			<u>Samuel Vega</u> <small>Assessment Team Leader</small>	<u>12/22/99</u> <small>Date</small>	<u>N/A</u> <small>Responsible Assistant Manager</small>	<u>Samuel Vega</u> <small>Quality Assurance Manager</small>	<u>12/22/99</u> <small>Date</small>	 <small>Date</small>
<u>Samuel Vega</u> <small>Assessment Team Leader</small>	<u>12/22/99</u> <small>Date</small>	<u>N/A</u> <small>Responsible Assistant Manager</small>						
<u>Samuel Vega</u> <small>Quality Assurance Manager</small>	<u>12/22/99</u> <small>Date</small>	 <small>Date</small>						
16. Corrective Actions Proposed by the Responsible Organization: Use CAR Continuation Sheet								
17. Acceptance of Proposed Corrective Actions:								
_____	_____							
<small>Assessment Team Leader</small>	<small>Date</small>							
18. Verification of Corrective Action Completion: (Use CAR Continuation Sheet)								
19a. Verified By: _____								
19b. Trend Cause Code: _____								
21. Closure: _____								
<small>Quality Assurance Manager</small>	<small>Date</small>							

CAO CORRECTIVE ACTION REPORT

(continuation sheet)

1. CAR No.: 00-009

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Block # 8 - Requirement that was violated:

- A. RFETS QAPjP, Section B3, Table B3-10, Minimum Training and Qualifications requirements, states in part that "Gas Chromatography/Mass Spectrometry(GC/MS) Technical Supervisors have a Bachelor of Science (BS) and 1 year applicable experience."
- B.1 RFETS QAPjP, Section B3, Table B3-10, Minimum Training and Qualifications requirements, Footnote b, states in part "Technical supervisors are those persons responsible for the overall technical operation and development of a specific laboratory technique. Refer to section A-7 of this document for site specific position titles."
- B.2 RFETS QAPjP, Section A-7g, RFETS Analytical Laboratories Manager responsibilities, fourth bullet "Reviews, approves and releases all analytical reports, including the analytical data package".

Block # 9 - Condition adverse to quality:

- A. Contrary to these requirements, the individual who performed the technical supervisory review for Batch Data Report, HVOC-DP-00234 did not have documented evidence to reflect applicable GC/MS Operation, Technique Development or Spectral Data Analysis Review Experience.
- B.1 Contrary to these requirements, Section A-7 of the RFETS QAPjP did not list the job function for the technical supervisor.
- B.2 Contrary to these requirements Batch Data Report HVOC-DP-DP-00234 did not have a signature release from the analytical laboratory manager.

CORRECTIVE ACTION REPORT

1. CAR No.: 00-010	2. Activity Report No.: A-00-08	3. Page <u>1</u> of <u>2</u>
4. Controlling Document: L-5017-L, "Data Review and Validation of Volatile Organic Compound Analysis for WIPP-TRU Waste Characterization Program (TWCP)-Data Generation Level"	5. CAO Assessment Team Leader: Samuel Vega	
6. Responsible Organization: RFETS TRU Project	7. CAQ Was Discussed With: Charley Turner J. J. Reynolds	
8. Requirement that was violated: Section 4.1 and Appendix C of L-5017-L states in part that technical supervisor review requires verification that, "...[batch report] is complete and includes raw data, calculation records..." and that the data "...have received independent technical review."		
9. Condition Adverse to Quality: See Continuation Sheet		
10. Suggested Actions (Optional):		
11a. Significant CAQ (Yes or No): YES 11b. Work Suspension Recommended (Yes or No): NO 11c. RCRA-Related (Yes or No): YES		
12. Types of Actions: Remedial: <input checked="" type="checkbox"/> Investigative: <input checked="" type="checkbox"/> Root Cause: <input checked="" type="checkbox"/> Actions to Preclude Recurrence: <input checked="" type="checkbox"/>		
13. CAR Initiator: <u>T. Greenwood</u> Date: <u>12/17/99</u>		
14. Response Due Date: <u>01/10/2000</u> Corrective Action Plan Required: YES		
15. Concurrence: <u>Samuel Vega</u> <u>12/22/99</u> <u>N/A</u> Assessment Team Leader Date Responsible Assistant Manager Date <u>Samuel Vega</u> <u>12/22/99</u> Quality Assurance Manager Date		
16. Corrective Actions Proposed by the Responsible Organization: Use CAR Continuation Sheet		
17. Acceptance of Proposed Corrective Actions: _____ Assessment Team Leader Date		
18. Verification of Corrective Action Completion: (Use CAR Continuation Sheet)		
19a. Verified By: _____		
19b. Trend Cause Code: _____		
21. Closure: _____ Quality Assurance Manager Date		

CAO CORRECTIVE ACTION REPORT

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Block # 9 - Condition adverse to quality

Batch Report HVOC DP-000234 did not contain applicable calculations or all data necessary to review the Batch Report. The Technical Supervisor review indicated that the data and calculations were included in the batch report. The package did not contain any objective evidence that the independent technical reviewer had done the calculations necessary to compare the data against the QAO requirements in Section B3 of the RFETS QAPjP. In addition to the lack of objective evidence for the QAO review by the independent technical reviewer, the package contained no GC/MS spectral data which is necessary for review with regard to data interpretation for such functions as the assignment of Tentatively Identified Compounds (TIC) to the waste streams.

CORRECTIVE ACTION REPORT

1. CAR No.: 00-011	2. Activity Report No.: A-00-08	3. Page <u>1</u> of <u>2</u>
4. Controlling Document: 1-MAN-008-WM-001, Revision 3	5. CAO Assessment Team Leader: Sam Vega	
6. Responsible Organization: : RFETS	7. CAQ Was Discussed With: G. A. O'Leary	
8. Requirement that was violated: 1-MAN-008-WM-001, TRANSURANIC (TRU) WASTE MANAGEMENT MANUAL, Revision 3, Section 3.2.3, states in part: "Work on the TRU Waste Characterization Project is performed according to established technical standards and administrative controls (procedures) identified in this document and the Site QAPjP. Each person supporting the project is responsible for the quality of his or her work and has the goal of doing work correctly the first time. Management of the project has established processes and procedures to ensure that work is planned and performed under controlled conditions by trained personnel. These processes and procedures are identified in this document and the site QAPjP.		
9. Condition Adverse to Quality: Many of the concerns identified during the audit were contributed to a failure to follow procedures. These failure to follow procedure concerns include the following examples: (See Continuation Sheet)		
10. Suggested Actions (Optional): 		
11a. Significant CAQ (Yes or No): YES 11b. Work Suspension Recommended (Yes or No): NO 11c. RCRA-Related (Yes or No): YES		
12. Types of Actions: Remedial: <u>X</u> Investigative: <u>X</u> Root Cause: <u>X</u> Actions to Preclude Recurrence: <u>X</u>		
13. CAR Initiator: <u>Charlie Riggs/L. Dee Scott</u> Date: <u>12/17/99</u>		
14. Response Due Date: <u>01/10/2000</u> Corrective Action Plan Required: YES		
15. Concurrence: <div style="display: flex; justify-content: space-between;"> <div style="text-align: center;"> <u>Samuel Vega</u> <small>Assessment Team Leader</small> </div> <div style="text-align: center;"> <u>12/22/99</u> <small>Date</small> </div> <div style="text-align: center;"> <u>N/A</u> <small>Responsible Assistant Manager</small> </div> <div style="text-align: center;"> <small>Date</small> </div> </div> <div style="display: flex; justify-content: space-between; margin-top: 10px;"> <div style="text-align: center;"> <u>Samuel Vega</u> <small>Quality Assurance Manager</small> </div> <div style="text-align: center;"> <u>12/22/99</u> <small>Date</small> </div> </div>		
16. Corrective Actions Proposed by the Responsible Organization: Use CAR Continuation Sheet		
17. Acceptance of Proposed Corrective Actions: <div style="display: flex; justify-content: space-between; margin-top: 10px;"> <div style="width: 60%; border-top: 1px solid black; text-align: center;"><small>Assessment Team Leader</small></div> <div style="width: 30%; border-top: 1px solid black; text-align: center;"><small>Date</small></div> </div>		
18. Verification of Corrective Action Completion: (Use CAR Continuation Sheet)		
19a. Verified By: _____		
19b. Trend Cause Code: _____		
21. Closure: _____ <div style="display: flex; justify-content: space-between; margin-top: 5px;"> <div style="width: 60%; text-align: center;"><small>Quality Assurance Manager</small></div> <div style="width: 30%; text-align: center;"><small>Date</small></div> </div>		

CAO CORRECTIVE ACTION REPORT

(continuation sheet)

1. CAR No.: 00-011

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Block # 9 Condition Adverse to Quality:

- The OJT for RTR Operators, as documented on the "NDT Level IIL RTR Certification Practical Examination," Revision 1, Form 037-247-01, did not include weight and volume estimates as required by 5-NDT-TC-1A, Section 7.3.
- WIPP-010, Rev. 5, Appendix 3, Receipt Acceptance Criteria, requires a completed security classification authorization signature. This signature was not in place on procedure WIPP-010, Rev. 5.
- The Independent Technical Reviewer (ITR) did not perform calculations to determine that the data met the Quality assurance Objectives (QAOs). One analyte on the field reference standards was not met and the ITR did not identify the condition. In addition, the Technical Supervisor checklist requires verification that calculation records are included in the data package. These were not included in the package. The ITR checklist indicates QC data was within control limits. The package did not contain any objective evidence that the ITR reviewed the data against the QAOs. In addition, the data package reviewed did not contain special analysis for the samples in the batch.
- Revision 'E' of procedure L-4006, was in the Building 559, Room 103, laboratory work area procedures book. The current revision of L-4006 is 'G'. Procedure L-1000-R, Section 7.1, states in part: "RFETS Radiological Laboratories personnel assure that their work areas are free of uncontrolled copies of L-Procedures, that only the most current version is available for use, and ..."
- Procedure L-4024-I, Section 3.2.3 describes the duties of the Analytical Laboratory WIPP Project File coordinator (ALWPFC). The ALWPFC was only performing 3 of the 5 assigned duties.
- Procedure 4-W30-NDT-00644, Section 8.4, requires that NDT personnel, "positively identify all items in waste packages ...". For the RTR scans of drums D67191 and D72317, the RTR operator did not attempt to positively identify all items in the waste package.
- Procedure 5-NDT-TC-1A, Section 11, requires that "Certifications and Supporting documents (i.e., examinations, recertification)" are QA records and shall be treated as WIPP records. Copies of the vision examination documentation had not been forwarded to WIPP records.
- The QA Officer conducted the technical supervisory review of data packages. This person did not meet the minimum requirements for qualifications specified in the QAPjP for a technical supervisor. There was no Education and Experience Evaluation form for the Technical Supervisor position. For headspace gas, this form would indicate a BS or higher and 1 year GC/MS experience.
- The microphone was not working when Visual Examination (VE) was performed on Batch VE-2000-01. The audio portion was dubbed onto the tape. Procedure 4-H80-776-ASRF-007, Section 6.8, states: "The actual process portion of the audio/videotape is NOT edited/altered."
- The visual examination batch data report contains a "WIPP RTR Visual Comparison Report, generated by the VEE. This comparison should have been done at the SPQAO level as required by Section B3-4 of the QAPjP.
- On the Visual Examination Drum Logs for VE Batch VE-2000-001, the VE Examiner recorded the Waste Summary Group, instead of the Waste Matrix Code as required by procedure 4-H80-776-ASRF-007, Appendix 3.
- Procedure 5-NDT-TC-1A, Section 3.0 requires that RTR OJT be conducted by a Level IIL Operator. A Level III Qualified RTR Operator was conducting the OJT.
- For the independent observation, the RTR Operator was signing as the operator on the Waste Characterization RTR Report (Data Package for Batch 5T-0102) when he should have signed as Independent Observer.