



United States Government

Department of Energy

memorandum

Carlsbad Field Office
Carlsbad, New Mexico 88221

DATE: April 18, 2001
REPLY TO
ATTN OF: CBFO:QA:MLC:VW:01-0689:UFC:2300
SUBJECT: Issuance of Corrective Action Report (CAR) 01-022


TO: Lori Fritz, ID



On April 12, 2001 the Carlsbad Field Office (CBFO) was notified by the Idaho National Engineering and Environmental Laboratory (INEEL) that one of the drums sent to WIPP for disposal in Shipment Number IN010053 was not approved for that shipment. Shipment Number IN010053 was received at WIPP on March 24, 2001 and emplaced in the WIPP underground disposal facility on March 29, 2001.

Please determine and document on the attached CAR continuation sheet, your proposed corrective action plan for the CAR. Please forward the proposed corrective action plan and schedule for completion to me prior to the response due date identified in CAR Block 14.

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


for Samuel A. Vega
Quality Assurance Manager

Attachment

cc: w/attachment
K. Watson, CBFO
L. Chism, CBFO
C. Gadbury, CBFO
J. Wells, DOE-ID
G. Beausoleil, DOE-ID
T. Preston, BBWI
T. Monk, BBWI
M. Eagle, EPA
✓ S. Zappe, NMED
B. Walker, EEG

T. Bowden, CTAC
M. Gerle, WTS
D. Winter, DNFSB

010436



CORRECTIVE ACTION REPORT

1. CAR No.: 01-022	2. Activity Report No.: N/A	3. Page <u>1</u> of <u>2</u>								
4. Controlling Document: NRC TRUPACT-II Certificate of Compliance No. 9218, TRAMPAC and WIPP HWFP		5. CBFO Assessment Team Leader: Kerry Watson								
6. Responsible Organization: INEEL		7. CAQ Was Discussed With: Don Pound								
<p>8. Requirement that was violated:</p> <p style="margin-left: 20px;">a. TRUPACT-II Certificate of Compliance No. 9218 from NRC, item 8 states: "Payload containers within a package shall be selected in accordance with Appendix 1.3.7 of the application, Section 6.0, 'Payload Assembly Requirements.'"</p> <p style="text-align: center;">Continued – See Attached</p>										
<p>9. Condition Adverse to Quality:</p> <p>Don Pound of INEEL notified Kerry Watson of CBFO on Thursday, April 12, 2001 that one of the drums sent to WIPP for disposal in shipment number IN010053 was not approved for that shipment. The number of the drum sent was IDRF003201324. The number of the drum that was approved for that shipment was IDRF003101324. Shipment number IN010053 was received at WIPP on March 24, 2001 and emplaced in the WIPP underground disposal facility on March 29, 2001.</p> <p style="text-align: center;">Continued – See Attached</p>										
10. Suggested Actions (Optional):										
<table style="width: 100%; border: none;"> <tr> <td style="width: 30%;">11a. Significant CAQ</td> <td>(Yes or No): Yes</td> </tr> <tr> <td>11b. Work Suspension Recommended</td> <td>(Yes or No): No</td> </tr> <tr> <td>11c. CCA-Related</td> <td>(Yes or No): No</td> </tr> <tr> <td>11d. RCRA-Related</td> <td>(Yes or No): Yes</td> </tr> </table>			11a. Significant CAQ	(Yes or No): Yes	11b. Work Suspension Recommended	(Yes or No): No	11c. CCA-Related	(Yes or No): No	11d. RCRA-Related	(Yes or No): Yes
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11b. Work Suspension Recommended	(Yes or No): No									
11c. CCA-Related	(Yes or No): No									
11d. 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>D. C. Gadbury</u> Date: <u>4-16-01</u>										
14. Response Due Date: <u>05/17/01</u> Corrective Action Plan Required: YES										
<table style="width: 100%; border: none;"> <tr> <td style="width: 33%; vertical-align: top;"> 15. Concurrence: <u>Michelle R. Bur</u> <small>for Kerry Watson</small> <small>Assessment Team Leader</small> </td> <td style="width: 33%; vertical-align: top;"> <u>4/17/2001</u> <small>Date</small> </td> <td style="width: 33%; vertical-align: top;"> <u>Michelle R. Bur</u> <small>for Kerry Watson</small> <small>Responsible Assistant Manager</small> </td> </tr> <tr> <td style="vertical-align: top;"> <u>Dea Chism</u> <small>for Quality Assurance Manager</small> </td> <td style="vertical-align: top;"> <u>4/18/01</u> <small>Date</small> </td> <td style="vertical-align: top;"> <u>4/17/2001</u> <small>Date</small> </td> </tr> </table>			15. Concurrence: <u>Michelle R. Bur</u> <small>for Kerry Watson</small> <small>Assessment Team Leader</small>	<u>4/17/2001</u> <small>Date</small>	<u>Michelle R. Bur</u> <small>for Kerry Watson</small> <small>Responsible Assistant Manager</small>	<u>Dea Chism</u> <small>for Quality Assurance Manager</small>	<u>4/18/01</u> <small>Date</small>	<u>4/17/2001</u> <small>Date</small>		
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16. Corrective Actions Proposed by the Responsible Organization: Use CAR Continuation Sheet										
17. Acceptance of Proposed Corrective Actions:										
<table style="width: 100%; border: none;"> <tr> <td style="width: 50%; border-top: 1px solid black;">Assessment Team Leader</td> <td style="width: 50%; border-top: 1px solid black;">Date</td> </tr> </table>			Assessment Team Leader	Date						
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18. Verification of Corrective Action Completion: (Use CAR Continuation Sheet)										
19a. Verified By: _____										
19b. Trend Cause Code: _____										
20. Closure: _____										
Quality Assurance Manager		Date								

CBFO CORRECTIVE ACTION REPORT

(continuation sheet)

1. CAR No.: 01-022

2. Activity No.: N/A

3. Page 2 of 2

Block # 8

- b. Section 6.0, third paragraph, second sentence of Appendix 1.3.7 of the TRAMPAC states: "Payload selection shall be made from only those payload containers that have been approved for shipment."
- c. Section 6.2.3, second paragraph, third bullet states: "The first two digits (representing the waste type) of ten-digit payload shipping category notation shall be the same for all payload containers making up a payload."
- d. Section B-4b(2)(i) of the WIPP Hazardous Waste Facility Permit (HWFP) addresses discrepancies between what the manifest states and the actual waste. The permit requires that the WIPP notify the NMED of any such discrepancy within 15 days of waste receipt if the discrepancy is not resolved. The permit also requires the generators to electronically transmit the waste shipment information to the WWIS before the TRU mixed waste shipment is transported.

Block # 9

The shipping category for all the drums in shipment number IN010053, except the one that was improperly sent, was 3003400707. The shipping category for the drum that was improperly sent was 2001700528. Therefore, the first two digits of the ten-digit payload shipping category notation were NOT the same for all payload containers making up the payload.

Since the waste was received on March 24, 2001, the notification should have been made "immediately" after April 8 to satisfy HWFP notification requirements. The notification was made on April 12.

INEEL (the generator) did not electronically transmit the information on drum number IDR003201324 to the WWIS before the shipment was transported.