memorandum

United States Government

Carlsbad Field Office
Carlsbad, New Mexico 88221

DATE: September 7, 2001
REPLY TO CBFO:QA:TJR:VW:01-1439:UFC:2300
ATTN OF: Evaluation and Closure of Corrective Action Reports 01-052, 01-053, 01-057 and 01-059
SUBJECT: To: Farok Sharif, WTS/CCP

The Carlsbad Field Office (CBFO) has evaluated the corrective actions for Corrective Action Reports (CARs) 01-052, 01-053, 01-057 and 01-059. The results of the evaluation indicate that WTS/CCP has adequately addressed the issues identified in the CARs. The evaluation results are documented on the attached CAR Continuation Sheets. The CARs have been closed by CBFO.

If you have any questions or comments, please contact me at 234-7311.

Thomas J. Reese
 Acting Quality Assurance Manager

Attachments

cc: w/attachments
K. Watson, CBFO
B. Bennington, CBFO
L. Chism, CBFO
D. Winters, DNFSB
S. Zappe, NMED
B. Walker, EEG
M. Eagle, EPA
M. Gerle, WTS Operating Record
J. Schuetz, CTAC

cc: w/o attachments
E. Bradford, CTAC
Block 17. Acceptance of Proposed Corrective Actions

I have reviewed the CCP Corrective Action Plan submitted by M. F. Sharif to Samuel Vega (REF: CP:01:01082) on August 15, 2001 for this CAR and it is acceptable.

Block 18. Verification of Corrective Action Completion

In verifying the corrective action associated with this CAR the following documents were reviewed: CCP-TP-025, CCP Mobile IPAN/GEA Expert Analysis, Revision 2, 7-03-01; CCP-AK-SRS-1, Revision 0, pages 11, 12, 17 and 18; and, supporting documentation. The CAR addressed the lack of reporting of values for U-234 & Sr-90. The documents reviewed provided adequate documentation to address this issue for both radionuclides; the corrective actions are complete.

Block # 19a Verified By: ___________________________ August 24, 2001
Patrick Kelly
Date

Block # 19b Trend Cause Code: 3.2, Inattention to detail
Block # 18  Verification of Corrective Action Completion

The following documentation was verified.


2. Request for Verification and Closure of CBFO Corrective Action Request Number 01-053, dated August 20, 2001 (CP:01:01084, UFC:2300.00) from Farok Sharif to Samuel A. Vega. The following attachments to this document provided objective evidence that the corrective actions were completed:
   a) The initiated and completed copy of the approved Corrective Action Plan for Corrective Action Report #01-053, signifying closure verification by the CCP Department Manager, Larry Dell, dated 8/20/01.
   c) CCP-TP-002, Rev. 2, “CCP Reconciliation of DQOs and Reporting Characterization Data”, Effective Date: August 2, 2001.
   d) Interpretation: Change to SRS Mixed Waste Streams Waste Matrix Code (WMC)
   e) The definition of WMC S5440 provided in Section 2.0 of the revised SRS AK Summary Report
   f) CCP-QP-026, Rev. 3, “CCP Inspection Control”, Effective Date: August 13, 2001
   g) Project Office Personnel CAR - Required Reading Status sheet identifying procedures CCP-QP-026 and CCP-TP-005 and associated reading acknowledgement sheets for all the CCP Project Office personnel.
   h) SRS CAR - Required Reading Status sheet identifying procedure CCP-TP-005 and the associated reading acknowledgement sheets for all the SRS based CCP Personnel.

Block # 19a  Verified By: [Signature] 8/31/2001

Block # 19b  Trend Cause Code: 2.1, Inadequate Procedure
CBFO CORRECTIVE ACTION REPORT

(continuation sheet)

<table>
<thead>
<tr>
<th>1. CAR No.: 01-057</th>
<th>2. Activity No.: S-01-19</th>
<th>3. Page 4 of 4</th>
</tr>
</thead>
</table>

### Block # 18 Verification of Corrective Action Completion

The following documentation was verified:


2. Request for Verification and Closure of CBFO Corrective Action Request Number 01-057, dated August 20, 2001 (CP:01:01084, UFC:2300.00) from Farok Sharif to Samuel A. Vega. The following attachments to this document provided objective evidence that the corrective actions were completed:

   a) The initiated and completed copy of the approved Corrective Action Plan for Corrective Action Report #01-057, Rev. 1, signifying closure verification by the CCP Department Manager, Larry Dell, dated 8/20/01.

   b) Attachment to Corrective Action Plan for CAR 01-057 (Lists all CCP CARS)

   c) Nonconformance Report, NCR No. NCR-SRS-0001-01, dated 5/7/01

   d) Voided Nonconformance Report, NCR No. NCR-SRS-0001-01 with concurrence by the Originator, Responsible Manager and the SPQAO, dated 5/24/01.


   f) CCP-QP-005, Rev. 4, "CCP TRU Nonconforming item Reporting and Control", Effective Date: July 18, 2001.

   g) CCP-PO-004, Rev. 3, "CCP/SRS Interface Document", Effective Date: August 17, 2001

   h) Project Office Personnel CAR – Required Reading Status sheet identifying procedures CCP-QP-005 and CCP-TP-005 and associated reading acknowledgement sheets for all the CCP Project Office personnel.

   i) SRS CAR – Required Reading Status sheet identifying procedures CCP-QP-005 and CCP-TP-005 and the associated reading acknowledgement sheets for all the SRS based CCP Personnel.

   j) CCP Commitment Tracking System TRU Nonconforming Item Reporting and Control Log dated Monday, August 20, 2001 And copies of all the NCRs listed on the Log (identifies all NCRs issued to date within the CCP Program, as well as the total reviewed to address potential impact upon the AK process)

### Block # 19a Verified by: A. Earl Bradford

### Block # 19b Trend Cause Code: 2.1, Inadequate Procedure

I have reviewed the CCP corrective action plan submitted on August 14, 2001 for this CAR. This plan addresses three specific conditions that are listed below with the status of each:

- Lack of valid calibration for IPAN/GEA NDA system – the required annual verification of calibration was performed in June, 2001 and is documented in BII-5104-AVR-001, Mobile Assay System Annual Verification Report for SRS Operations. This action adequately addresses this CAR.

- Use of algorithm for the IPAN/GEA system that incorrectly quantifies the Pu-239 fissile mass for samples that report a U-235 detection limit – two software units have been revised to address this issue and are documented in BII-5104-SRN-013 and BII-5104-SRN-014, and Data V&V descriptions BII-5104-SVVD-000 and BII-5104-ERGSVVD-000. These actions adequately addresses this CAR.

- Lack of adequate documentation for the IPAN/GEA system’s TMU – the Corrective Action Plan submitted to CBFO by CCP provided Revision 0 of the BNFL document BII-5104-TMU-001, Total Measurement Uncertainty for the BNFL Instruments Mobile Assay System, dated 7-03-01. This document has been modified and is technically acceptable. However, some of the language in this report should be clarified to better present the authors’ conceptual basis. Specifically: (1) page 15 should better explain why PAN data can be used as presented; (2) page 19 should better explain that the intention is to de-couple the effects of the matrix and the source term distribution; and, (3) the derivation of the PAN standard deviation being used as 5 σ limits should be explained.

Verified By:  
Patrick Kelly  
August 24, 2001  
Date

Trend Cause Code: 3.2, Inattention to detail