

# memorandum

Carlsbad Field Office  
Carlsbad, New Mexico 88221

DATE: September 13, 2001

REPLY TO  
ATTN OF: CBFO:QA:TJR:VW:01-1446:UFC:2300SUBJECT: Evaluation and Closure of Corrective Action Reports (CARs) 01-049, 01-050, 01-051,  
01-054 and 01-058

TO: Farok Sharif, WTS/CCP

The Carlsbad Field Office (CBFO) has evaluated the corrective actions for Corrective Action Reports (CARs) 01-049, 01-050, 01-051, 01-054 and 01-058. 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 ext. 7311.



Thomas J. Reese  
Acting Quality Assurance Manager

## Attachments

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

cc: w/o attachments  
K. Watson, CBFO \*ED  
M. Horseman, CTAC \*ED  
E. Bradford, CTAC \*ED  
J. Schuetz, CTAC \*ED  
\*ED denotes electronically distributed



010923



# CBF~~G~~ CORRECTIVE ACTION REPORT

(continuation sheet)

1. CAR No.: 01-049

2. Activity No.:

3. S-01-19

3. Page    of   

**Block #   18   Verification of Corrective Action Completion**

The corrective actions taken and implemented for this CAR were evaluated based on closure documentation provided by the Central Characterization Project (CCP) in a letter from M. F. Sharif to S. A. Vega dated August 13, 2001.

**Root Cause of the Problem:**

*The discrepancy form identified in this CAR will no longer be used. Procedure CCP-TP-001 will be updated to properly check for and define discrepancies. Discrepancies will be identified in NCRs, and CARs will be used to identify negative quality trends.*

Verified by review of Revision 3 of procedure CCP-TP-001.

*Training on the process will be conducted for data generation level and project level validation personnel to clarify how discrepancies will be identified and corrected.*

Verified by the review of syllabus and/or attendance sheets for the following training sessions: CCP General Overview Training; CCP Headspace Gas General Training; CCP Radiography General Training; CCP NDA General Training; and, OJT RTR, NDA, HSG Data Package Review.

*The drums analyzed via RTR on the first ten batch data reports will be re-analyzed. Corrective actions for CAR-CCP-0506 and NCR-CCP-0001-01 will be completed.*

Verified by review of CAR-CCP-0506 (closed 06/27/2001) and NCR-CCP-0001-01 (closed 08/10/2001). Also reviewed Batch Data Report Number SRRTR0028.

**Actions to Preclude Recurrence:**

*In addition, thorough walk-downs of the process will be performed as re-analyzed packages are generated and evaluated to ensure that the personnel properly follow procedures and incorporate the subject matter covered in the training.*

Verified by review of the Trip Report for Adela M. Cantu, SRS for the period July 1 through July 11, and July 23-27.

Based on the above information, corrective action from the CAR and the RFETS CAP are verified as complete and the CAR is recommended for closure.

Block 19a Verified By:

  
\_\_\_\_\_  
Charles L. Riggs

9/5/01  
\_\_\_\_\_  
Date

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

# CBFO CORRECTIVE ACTION REPORT

(Continuation Sheet)

1. CAR No. 01-050	2. Activity Report No. S-01-19	3. Page / Of /
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**Block # 18 Verification of Corrective Action Completion**

The following documentation showing evidence of completion of corrective actions for CAR 01-050 was evaluated.

Verified by reviewing revised procedure CCP-TP-007, Rev. 9, dated 08/30/01, "CCP Single Sample Manifold Headspace Gas Sampling and Analysis". The required changes were made throughout the procedure. This procedure is acceptable. See attached objective evidence of procedure review comment resolution.

Verified by reviewing revised procedure CCP-TP-009, Rev. 7, dated 9/04/01, "CCP Single Sample Manifold Data Handling." The required changes were made throughout the procedure. This procedure is acceptable. See attached objective evidence of procedure review comment resolution.

Verified by reviewing revised procedure CCP-TP-029, Rev. 5, dated 8/28/01, "CCP Single Sample Manifold Headspace Gas Sampling and Analysis Methods and Equipment Calibration." The required changes were made throughout the procedure. This procedure is acceptable. See attached objective evidence of procedure review comment resolution.

Verified by reviewing revised procedure CCP-TP-032, Rev. 5, dated 8/28/01, "CCP Single Sample Manifold Data Validation." The required changes were made throughout the procedure. This procedure is acceptable. See attached objective evidence of procedure review comment resolution.

Based on the above information, corrective actions for the CAR is verified as complete and the CAR is recommended for closure.

Block # 19a Verified By:  Date: 9/4/01  
Dorothy Gill

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

# CBFO CORRECTIVE ACTION REPORT

(continuation sheet)

1. CAR No.: 01-051

2. Activity No.: S-01-19

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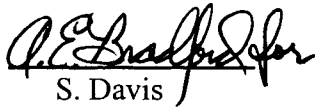
**Block # 18 Verification of Corrective Action Completion**

The following objective evidence was reviewed and found satisfactory to verify and close CAR 01-51 issued during Surveillance S-01-19.

- Procedure CCP-TP-029, Revision , Section 4.1.3 has been revised to require calibration of the PID in accordance to manufacturer's instructions.
- The spreadsheet used to calculate MDL values includes both calculations for MDLs in ppm(V) and ng/10m injection.
- Revision of procedure CCP-TP-007, Rev. 9 Appendix 3, and required reading training documentation for headspace gas operators to procedure CCP-TP-007 for use and proper logbook entry were reviewed, verified and found satisfactory.
- Documentation of operators re-trained in the preparation of on-line batch data reports and how to document the sample size in accordance with procedure CCP-TP-009 was reviewed and verified.
- Verified that procedure CCP-TP-009 was revised to clarify how the quantitative criteria are used.
- Verified that RRT has been removed from section 4.2 of procedure CCP-TP-009.
- Verified that ICAL is described in section 4.1 of procedure CCP-TP-009 and the ICAL checklist only requires a review by the Headspace Gas Operator.

Block # 19a

Verified By:

  
S. Davis

Date:

9/10/2001

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

# CAO CORRECTIVE ACTION REPORT

(continuation sheet)

1. CAR No. 01-054

2. Activity Report No. S-01-19

3. Page 4 of 4

Block 18

Verification of Corrective Action:

Verified by review of CCP-QP-002, "CCP Training and Qualification Plan", Revision 6, dated 09/04/01, satisfactorily addresses the education and qualification requirements for participant positions or job functions determined to be important to compliance application, nuclear safety, waste characterization or waste isolation, specifically management positions. An example of the management positions reflected in Table 2, "The Evaluation of CCP Personnel Qualifications by Position" include the Site Project Manager and Deputy, Site Project Quality Assurance Officer and Deputy, Waste Certification Official and Transportation Certification Official.

Additionally, a memo from the Site Project Manager to CCP key staff personnel, dated July 17, 2001 was issued to reiterate the need for training of all CCP personnel (as applicable) in the changes made to procedures. Training and indoctrination of CCP personnel in accordance with CCP-QP-002, Revision 6, "CCP Training and Qualification Plan" was verified accomplished with the exception of two individuals, one in training and one on extended travel/vacation. Training records for the two CCP personnel will be verified at a later date.

The recommendation is made that CAR 01-054 be closed.

Block 19a.

Verified By: \_\_\_\_\_

Chet Wright

Date: \_\_\_\_\_

September 6, 2001

Block 19b.

Trend Cause Code: 3.2

# CBFO CORRECTIVE ACTION REPORT

(continuation sheet)

1. CAR No.: 01-058

2. Activity No.: S-01-19

3. Page 4 of 4

## Block # 18 Verification of Corrective Action Completion

The following documentation was verified.

1. Approved Corrective Action Plan for CAR-01-058, evaluated by Earl Bradford on 7/25/01 and transmitted to Farok Sharif from Samuel A. Vega on July 26, 2001 (CBFO:QA:MLC:VW:01-1187:UFC:2300).
2. Request for Verification and Closure of CBFO Corrective Action Request Number 01-058, 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 #01-058, Rev. 1, signifying closure verification by the CCP Department Manager, Larry Dell, dated 8/20/01.
  - b) CCP-TP-035, Rev. 4, "CCP Container Management", Effective Date: August 14, 2001
  - c) Project Office Personnel CAR – Required Reading Status sheet identifying procedure CCP-QP-011, Rev 1, and CCP-TP-035 Rev 4, and attached acknowledgement sheet for all the CCP Project Office personnel.
  - d) SRS CAR – Required Reading Status sheet identifying procedure CCP-QP-011, Rev 1 and CCP-TP-035, Rev 4, and the associated reading acknowledgement sheets for all the SRS based CCP Personnel.
  - e) Syllabus for CCP General Overview Training, Dated 6/28/2001 and attached attendance rosters
  - f) Syllabus for CCP Container Management Training for procedure CCP-TP-035, Dated 6/28/2001 and attached attendance rosters.
  - g) CCP Attendance Roster for all SRS assigned personnel for CAR Briefing.
  - h) List of Logbooks at SRS
  - i) Copies of Logbook entries for NDE Daily Activities, dated 6/18/01
  - j) Inter-office Correspondence from S. Klover to CCP Manager Distribution, "Surveillance of CCP-QP-011, CCP Notebooks and Logbooks", transmitting the results of the subject surveillance.
  - k) CCP-TP-007, Rev. 9, "CCP Single Sample Manifold Headspace Gas Sampling and Analysis Procedure", Effective Date: August 30, 2001
  - l) CCP-TP-007 required training listing and attached required reading documentation.

Block # 19a

Verified by:

  
A. Earl Bradford

9/5/01  
Date

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