

United States Government



# memorandum

Carlsbad Field Office  
Carlsbad, New Mexico 88221

DATE: December 20, 2001  
 REPLY TO  
 ATTN OF: CBFO:QA:TJR:KJB 01-1857 UFC 2300  
 SUBJECT: Issuance of Corrective Action Reports (CARs); 02-029 through 02-032  
 TO: Dale Ormand, SR



The Carlsbad Field Office (CBFO) performed Audit A-02-06 of the Savannah River Site (SRS) on December 10-14, 2001. CBFO CARs 02-029 through 02-032 are attached.

Please document on the attached CAR Continuation Sheets 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 you have any questions or comments, please contact me at (505) 234 -7311.

*/s/ signature on file*  
 Thomas J. Reese  
 Acting QA Manager

## Attachments

cc w/attachments:  
 K. Watson, CBFO \*ED  
 L. Chism, CBFO  
 J. D'Amelio, SRS \*ED  
 M. Mason, SRS \*ED  
 M. Eagle, EPA \*ED  
 S. Monroe, EPA \*ED  
 S. Zappe, NMED \*ED  
 B. Walker, EEG \*ED  
 D. Winters, DNFSB \*ED  
 M. Gerle, WTS Operating Record  
 J. Schuetz, CTAC  
 M. Horseman, CTAC \*ED  
 \*ED Denotes Electronic Distribution

011214



# CORRECTIVE ACTION REPORT

<b>1. CAR No.:</b> 02-032	<b>2. Activity Report No.:</b> A-02-06	<b>3. Page</b> <u>1</u> <b>of</b>
<b>4. Controlling Document:</b> DOE/WIPP-069, Rev. 7	<b>5. CBFO Assessment Team Leader:</b> Jerry Reese	
<b>6. Responsible Organization:</b> : SRS NDA	<b>7. CAQ Was Discussed With:</b> H. Coleman, A. Gibbs, M. Pitts	
<b>8. Requirement that was violated:</b> DOE/WIPP-069 WAC, Appendix A, Section A.8, Para 8 states: "Sites must document how the individual elements contributing to TMU were determined and how they are combined to calculate the total TMU. The TMU must be correctly calculated and adequately documented."		
<b>9. Condition Adverse to Quality:</b>  The gamma data report sheets state that the isotopics are generated via "MGA", (Multi-Group Analysis), which is incorrect. The isotopics are derived from AK. (This was previously identified during the CBFO SRS Audit in 11-00, CAR 01-006).		
<b>10. Suggested Actions (Optional):</b>  		
<b>11a. Significant CAQ</b>	(Yes or No): Yes	
<b>11b. Work Suspension Recommended</b>	(Yes or No): No	
<b>11c. CCA-Related</b>	(Yes or No): Yes	
<b>11d. RCRA-Related</b>	(Yes or No): No	
<b>12. Types of Actions:</b> Remedial: <input checked="" type="checkbox"/> Investigative: <input checked="" type="checkbox"/> Root Cause: <input checked="" type="checkbox"/> Actions to Preclude Recurrence: <input checked="" type="checkbox"/>		
<b>13. CAR Initiator:</b> Patrick Kelly and Porf Martinez _____ <b>Date:</b> December 14, 2001		
<b>14. Response Due Date:</b> <u>January 20, 2002</u> <b>Corrective Action Plan Required:</b> YES		
<b>15. Concurrence:</b> /s/ signature on file _____ Assessment Team Leader	12-20-01 _____ Date	N/A _____ Responsible Assistant Manager
/s/ signature on file _____ Quality Assurance Manager	12-20-01 _____ Date	Date
<b>16. Corrective Actions Proposed by the Responsible Organization:</b> Use CAR Continuation Sheet		
<b>17. Acceptance of Proposed Corrective Actions:</b>  _____ <b>Assessment Team Leader</b> _____ <b>Date</b>		
<b>18. Verification of Corrective Action Completion: (Use CAR Continuation Sheet)</b>		
<b>19a. Verified By:</b> _____		
<b>19b. Trend Cause Code:</b> _____		
<b>20. Closure:</b> _____ Quality Assurance Manager      _____ <b>Date</b>		

# CBFO CORRECTIVE ACTION REPORT

(continuation sheet)

1. CAR No.:

2. Activity No.:

3. Page \_\_\_ of \_\_\_

Block #\_

# CORRECTIVE ACTION REPORT

<b>1. CAR No.:</b> 02-029	<b>2. Activity Report No.:</b> A-02-06	<b>3. Page</b> <u>1</u> <b>of</b>																
<b>4. Controlling Document:</b> WP-AP-0002, <i>WIPP Disposal Program Acceptable Knowledge</i>	<b>5. CBFO Assessment Team Leader:</b> Jerry Reese																	
<b>6. Responsible Organization :</b> SRS AK	<b>7. CAQ Was Discussed With:</b> Jeff Lunsford																	
<b>8. Requirement that was violated:</b> WA-AP-0002, The Site Project QA Officer shall ensure that assessments are performed (on a waste stream basis) to determine the degree of compliance with Acceptable Knowledge (AK) Data Quality Requirements as described in QAPjP section B4-3e.																		
<b>9. Condition Adverse to Quality:</b>  The AK Accuracy Report is compiled from data generated at the Project Level which assures 100% accuracy. The process should be revised to reflect the true accuracy of the confirmation process.  Drums that have contents that do not conform to the Waste Matrix Code (WMC) Description are not flagged as an AK accuracy issue.																		
<b>10. Suggested Actions (Optional):</b>																		
<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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11c. CCA-Related	(Yes or No): NO																	
11d. RCRA-Related	(Yes or No): YES																	
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<b>13. CAR Initiator:</b> <u>Dick Blauvelt and Steve Calvert</u> <b>Date:</b> <u>December 14, 2001</u>																		
<b>14. Response Due Date:</b> <u>January 20, 2002</u> <b>Corrective Action Plan Required:</b> YES																		
<table style="width: 100%; border: none;"> <tr> <td style="width: 33%;"><b>15. Concurrence:</b> <u>/s/ signature on file</u></td> <td style="width: 15%;"><u>12-20-01</u></td> <td style="width: 33%;"><u>N/A</u></td> <td style="width: 19%;"></td> </tr> <tr> <td style="text-align: center;">Assessment Team Leader</td> <td style="text-align: center;">Date</td> <td style="text-align: center;">Responsible Assistant Manager</td> <td style="text-align: center;">Date</td> </tr> <tr> <td> <u>/s/ signature on file</u></td> <td> <u>12-20-01</u></td> <td></td> <td></td> </tr> <tr> <td style="text-align: center;">Quality Assurance Manager</td> <td style="text-align: center;">Date</td> <td></td> <td></td> </tr> </table>			<b>15. Concurrence:</b> <u>/s/ signature on file</u>	<u>12-20-01</u>	<u>N/A</u>		Assessment Team Leader	Date	Responsible Assistant Manager	Date	 <u>/s/ signature on file</u>	 <u>12-20-01</u>			Quality Assurance Manager	Date		
<b>15. Concurrence:</b> <u>/s/ signature on file</u>	<u>12-20-01</u>	<u>N/A</u>																
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Quality Assurance Manager	Date																	
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<b>17. Acceptance of Proposed Corrective Actions:</b>  _____ <span style="float: right;">_____</span> Assessment Team Leader <span style="float: right;">Date</span>																		
<b>18. Verification of Corrective Action Completion: (Use CAR Continuation Sheet)</b>																		
<b>19a. Verified By:</b> _____																		
<b>19b. Trend Cause Code:</b> _____																		
<b>20. Closure:</b> _____ <span style="float: right;">_____</span> Quality Assurance Manager <span style="float: right;">Date</span>																		

# CBFO CORRECTIVE ACTION REPORT

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1. CAR No.:	2. Activity No.:	3. Page ___ of ___
<p>Block #_</p>		

# CORRECTIVE ACTION REPORT

<b>1. CAR No.:</b> 02-030	<b>2. Activity Report No.:</b> A-02-06	<b>3. Page</b> <u>1</u> <b>of</b>								
<b>4. Controlling Document:</b> HWFP WAP		<b>5. CBFO Assessment Team Leader:</b> Jerry Reese								
<b>6. Responsible Organization:</b> : SRS AK		<b>7. CAQ Was Discussed With:</b> Jeff Lunsford								
<b>8. Requirement that was violated:</b> WAP B4-3b, Sites shall prepare and implement a written procedure to evaluate acceptable knowledge and resolve discrepancies. If different sources of information indicate different hazardous wastes are present, then sites shall include all sources of information in its records and conservatively assign all potential hazardous waste codes unless the sites choose to justify an alternative assignment and document the justification in the auditable record. The assignment of hazardous waste codes shall be tracked in the auditable record to all required documentation.										
<b>9. Condition Adverse to Quality:</b>  There are discrepancies in the AK record for the 027 waste stream that require resolution. As an example, the AK Summary documents prepared for the waste stream by SRS and CCP are not in full agreement.										
<b>10. Suggested Actions (Optional):</b>										
<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									
<b>12. Types of Actions:</b> Remedial: <u>X</u> Investigative: <u>X</u> Root Cause: <u>X</u> Actions to Preclude Recurrence: <u>X</u>										
<b>13. CAR Initiator:</b> <u>Dick Blauvelt and Steve Calvert</u> <b>Date:</b> <u>December 14, 2001</u>										
<b>14. Response Due Date:</b> <u>January 20, 2002</u> <b>Corrective Action Plan Required:</b> YES										
<b>15. Concurrence:</b> <u>/s/ signature on file</u> _____ <small>Assessment Team Leader</small>	<u>12-20-01</u> _____ <small>Date</small>	<u>N/A</u> _____ <small>Responsible Assistant Manager</small> <u>        </u> _____ <small>Date</small>								
<u>/s/ signature on file</u> _____ <small>Quality Assurance Manager</small>	<u>12-20-01</u> _____ <small>Date</small>									
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<b>17. Acceptance of Proposed Corrective Actions:</b>  _____      _____ <small>Assessment Team Leader</small> <small>Date</small>										
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# CBFO CORRECTIVE ACTION REPORT

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# CORRECTIVE ACTION REPORT

<b>1. CAR No.:</b> 02-031	<b>2. Activity Report No.:</b> A-02-06	<b>3. Page</b> <u>1</u> <b>of</b>
<b>4. Controlling Document:</b> DOE/WIPP-069, Rev. 7	<b>5. CBFO Assessment Team Leader:</b> Jerry Reese	
<b>6. Responsible Organization:</b> : SRS NDA	<b>7. CAQ Was Discussed With:</b> H. Coleman, A. Gibbs, M. Pitts	
<p><b>8. Requirement that was violated:</b> WAC, DOE/WIPP-069, Rev. 7, Appedix A, Section A.2 and Table A-1.                  Each site shall demonstrate and technically justify that the radioassay techniques used are appropriate for the specific waste stream and TRUCON waste type being assayed. The QAOs for radioassay are summarized in table A-1. The NDA QAOs have been established for precision and accuracy. Sites shall demonstrate that the QAOs can be achieved for each radioassay system over the applicable ranges of measurement.</p>		
<p><b>9. Condition Adverse to Quality:</b></p> <p>SRS procedure SW 15.7-SOP-SGS-01, Rev 4, Section 2.2 states that the Segmented Gamma Scanner (SGS) is calibrated for "0 to 2.0 TRU alpha curies". This represents 3 alpha curie ranges in DOE/WIPP-069, R7. SRS also states the SGS is calibrated to 10 grams WG Pu. The SGS is calibrated for up to 3.1 grams, and the QAOs were verified for <u>1</u> WAC range 0.02-0.2 alpha curies. Waste outside of the range were assayed.</p> <p>SRS J-SUP-E-00001, Revision 0, Startup Test Plan for SGS has an incorrect calculation for 1 PDP standard (0.6675g versus 0.6375g WG Pu, ~ 4.7% diff). No assays were adversely affected.</p>		
<b>10. Suggested Actions (Optional):</b>		
<b>11a. Significant CAQ</b>	<b>(Yes or No):</b> Yes	
<b>11b. Work Suspension Recommended</b>	<b>(Yes or No):</b> No	
<b>11c. CCA-Related</b>	<b>(Yes or No):</b> Yes	
<b>11d. RCRA-Related</b>	<b>(Yes or No):</b> No	
<b>12. Types of Actions:</b> Remedial: <input checked="" type="checkbox"/> Investigative: <input checked="" type="checkbox"/> Root Cause: <input checked="" type="checkbox"/> Actions to Preclude Recurrence: <input checked="" type="checkbox"/>		
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<b>14. Response Due Date:</b> <u>January 20, 2002</u>		<b>Corrective Action Plan Required:</b> YES
<b>15. Concurrence:</b> <u>/s/ signature on file</u> _____	<u>12-20-01</u> _____	<u>N/A</u> _____
Assessment Team Leader	Date	Responsible Assistant Manager
<u>/s/ signature on file</u> _____	<u>12-20-01</u> _____	
Quality Assurance Manager	Date	
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<b>17. Acceptance of Proposed Corrective Actions:</b>		
_____	_____	
Assessment Team Leader	Date	
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<b>20. Closure:</b> _____		
Quality Assurance Manager	Date	



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