

United States Government

Department of Energy

**memorandum**Carlsbad Field Office  
Carlsbad, New Mexico 88221

DATE: March 19, 2002

REPLY TO  
ATTN OF: CBFO:QA:ALH:GS:02-1001:UFC 2300.00

SUBJECT: Evaluation and Closure of Corrective Action Reports

TO: Lam Xuan, Manager TRU Waste, RFFO

The Carlsbad Field Office (CBFO) has evaluated the planned Corrective Actions for Corrective Action Reports (CARs) 02-044 through 02-052. The results of the evaluation indicate that RFETS has adequately addressed the issues identified in the CARs. The evaluation results are documented on the attached CAR Continuation Sheets. CAR 02-044 has been closed by CBFO.

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

*Ava L. Holland /s/*  
Ava L. Holland  
Quality Assurance Manager

**Attachments**

cc w/attachments:  
 K. Watson, CBFO \*ED  
 G. Morgan, RFFO \*ED  
 J. Schneider, RFFO \*ED  
 G. O'Leary, RFETS \*ED  
 F. Grady, RFETS \*ED  
 B. Walker, EEG \*ED  
 S. Zappe, NMED \*ED  
 M. Eagle, EPA \*ED  
 S. Monroe, EPA \*ED  
 E. Feltcorn, EPA \*ED  
 C. Riggs, CTAC \*ED  
 A. Pangle, CTAC \*ED  
 J. Schuetz, CTAC  
 P. Roush, WTS  
 L. Chism, CBFO  
 CBFO Mailroom

020316



# CBFO CORRECTIVE ACTION REPORT

(continuation sheet)

1. CAR No.: 02-044	2. Activity No.: A-02-07	3. Page ___ of ___
<p><b>Block #17 Acceptance of Proposed Corrective Actions and Block #18 Verification of Corrective Action Completion:</b></p> <p>RFETS is correct that section 7.4.2 of SW846, method 8000B does not apply to analyses using mass spectrometer detection.</p> <p>RFETS procedure L4215, Rev. D does contain the quality control requirements and acceptance criteria for internal standards required by SW846, method 8270C. Specifically, form 8 in the procedure requires that the area of the internal standard be within +100 to -50% of the previous calibration and that the retention time be within +/- 30 seconds. These are as required by method 8270C, section 7.4.6 and 7.4.7. Section 5.5 of L4215, Rev. D addresses the quality control measurements required by method 8270C which address the requirement in section 3.1 of 8270C that <i>“Raw GC/MS data from all blanks, samples, and spikes must be evaluated for interferences. Determine if the source of interference is in the preparation and/or cleanup of the samples and take corrective action to eliminate the problem.”</i></p> <p>These attributes were verified by review of the procedure.</p> <p>The RFETS response is acceptable and it is recommended that this CAR be closed.</p> <p><b>19a. Verified By:</b> _____ Wayne Ledford Date</p> <p><b>19b. Trend Cause Code: 3.4</b></p>		

# CBFO CORRECTIVE ACTION REPORT

(Continuation Sheet)

1. CAR No. 02-045

2. Activity Report No. A-02-07

3. Page \_\_\_\_\_ Of \_\_\_\_\_

## Block 17 Evaluation of Proposed Corrective Actions

The following is an evaluation of the response as submitted by the RFETS on February 28, 2002:

The corrective actions described in the above response are acceptable.

Evaluated By: \_\_\_\_\_ Date: \_\_\_\_\_  
William 'BJ' Verret

# CBFO CORRECTIVE ACTION REPORT

(Continuation Sheet)

1. CAR No. 02-046

2. Activity Report No. A-02-07

3. Page \_\_\_\_\_ Of \_\_\_\_\_

## Block 17 Evaluation of Proposed Corrective Actions

The following is an evaluation of the response as submitted by the RFETS via e-mail on March 8, 2002:

The corrective actions described in the above response are acceptable.

Evaluated By: \_\_\_\_\_ Date: \_\_\_\_\_  
Wayne Ledford

# CDFO CORRECTIVE ACTION REPORT

(Continuation Sheet)

1. CAR No. 02-047	2. Activity Report No. A-02-07	3. Page _____ Of _____
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## Block 17 Evaluation of Proposed Corrective Actions

The following is an evaluation of the response as submitted by the RFETS on February 28, 2002:

The corrective actions described in the above response are acceptable.

Evaluated By: \_\_\_\_\_ Date: \_\_\_\_\_  
Wayne Ledford

# CBFO CORRECTIVE ACTION REPORT

(Continuation Sheet)

1. CAR No. 02-048	2. Activity Report No. A-02-07	3. Page _____ Of _____
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## Block 17 Evaluation of Proposed Corrective Actions

The following is an evaluation of the response as submitted by the RFETS on February 28, 2002:

The corrective actions described in the above response are acceptable. However, it is recommended that RFETS include instructions on properly filling out the maintenance forms in the Pre-Evolution briefings.

Evaluated By: \_\_\_\_\_ Date: \_\_\_\_\_  
L. Dee Scott

# CBFO CORRECTIVE ACTION REPORT

(Continuation Sheet)

1. CAR No. 02-049

2. Activity Report No. A-02-07

3. Page \_\_\_\_\_ Of \_\_\_\_\_

## Block 17 Evaluation of Proposed Corrective Actions

The following is an evaluation of the response as submitted by the RFETS on February 28, 2002:

The corrective actions described in the above response are acceptable.

Evaluated By: \_\_\_\_\_ Date: \_\_\_\_\_

Jack Walsh

# CBFO CORRECTIVE ACTION REPORT

(continuation sheet)

1. CAR No.: 02-050

2. Activity No.: A-02-07

3. Page 1 of 1

Block # 17

The following is an evaluation of the response as submitted by the RFETS on February 28, 2002:

1. The remedial action does not address how each identified deficiency will be addressed. Each needs to be brought into compliance with the existing procedure. Non-reviewed documents should be reviewed. Non-approved documents should be approved. Missing documents need to be provided or a justification added to the files. Unique software name and number should be added to the procurement documents, and so forth. The closure documentation should show how each was corrected.
2. Investigative actions should include a review of the current state of documentation, reviews, approvals, etc. to identify other deficiencies and address bringing them into compliance with the existing procedure. The closure documentation should show how each was corrected. The action (Actions to Preclude Recurrence) to compare documentation against the QAPD (gap analysis) is not correct because RFETS worked to their procedure, and it is against their procedure that the documentation should be compared. New procedures are not normally retroactive.
3. One observed possible cause was that the Technical Subject Matter Experts (TSMs) did not take responsibility for the QA side of their work. They believed that QA personnel would do all QA things. The TSMs must recognize their responsibility. (This might be what is intended by the RFETS root cause "Failure to clearly assign single point contact responsibility for each NDA platform".) This also might be addressed by the procedure revision.
4. The practice of using the SCR process for everything related to NDA SQA caused people to miss the requirements in other sections of the procedure (e.g., installation and checkout requirements). Some method to assure other requirements are recognized and implemented needs to be included. This might be addressed by the procedure revision.
5. The CBFO review of the revised procedure under "Actions to Preclude Recurrence" is not required by CBFO. In addition, it will prevent implementation until the completion of the CBFO review. This review will not be a simple review because the procedure will be totally revised. A revised matrix to the QAPD (INS 246) will be required to help with the review. Recommend that this review be deleted and the adequacy review take place during CAR closure.

Both the original response and these comments must be addressed by the corrective action. The response may be revised to address these comments, or the corrective action actually taken may address these comments. Closure will verify that all have been satisfactorily addressed.

Response Evaluated by: \_\_\_\_\_ Date: \_\_\_\_\_  
Norman C. Frank



# CBFO CORRECTIVE ACTION REPORT

(Continuation Sheet)

1. CAR No. 02-051	2. Activity Report No. A-02-07	3. Page _____ Of _____
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## Block 17 Evaluation of Proposed Corrective Actions

The following is an evaluation of the response as submitted by the RFETS on February 28, 2002:

The corrective actions described in the above response are acceptable.

Evaluated By: \_\_\_\_\_ Date: \_\_\_\_\_  
Patrick Kelly

# CBFO CORRECTIVE ACTION REPORT

(Continuation Sheet)

1. CAR No. 02-052	2. Activity Report No. A-02-07	3. Page _____ Of _____
<p><b>Block <u>17</u> Evaluation of Proposed Corrective Actions</b></p> <p>The following is an evaluation of the response as submitted by the RFETS on February 28, 2002:</p> <p>The corrective actions described in the above response are acceptable.</p> <p>Evaluated By: _____ Date: _____</p> <p>Patrick Kelly</p>		