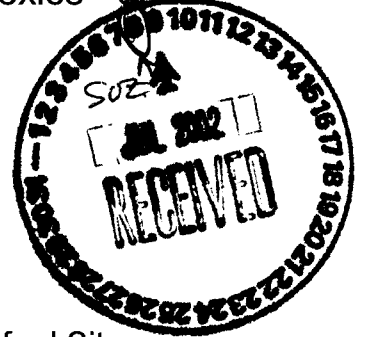


United States Government

Department of Energy

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

DATE: July 8, 2002

REPLY TO  
ATTN OF: CBFO:QA:MPN:GS:02-1219:UFC 2300.00

SUBJECT: Issuance of Corrective Action Reports Initiated During Audit A-02-23

TO: Todd Shrader, DOE-RL

The Carlsbad Field Office (CBFO) performed Audit A-02-23 of the Hanford Site on June 24-28, 2002. CBFO Corrective Action Reports (CARs) 02-069 and 02-070 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. The corrective actions for these CARs, requiring accelerated corrective action, must be completed within thirty days of the receipt of this memorandum.

If you have any questions or comments, please contact me at (505) 234-7483.

*Martin P. Navarrete* //signature on file//  
Martin P. Navarrete  
Quality Assurance Specialist

## Attachments

cc w/attachments:

|                     |     |
|---------------------|-----|
| R. Knerr, CBFO      | *ED |
| K. Watson, CBFO     | *ED |
| A. Holland, CBFO    | *ED |
| P. Crane, FH        | *ED |
| D. DeRosa, FH       | *ED |
| J. Maupin, FH       | *ED |
| M. Eagle, EPA       | *ED |
| S. Monroe, EPA      | *ED |
| E. Feltcorn, EPA    | *ED |
| S. Zappe, NMED      | *ED |
| B. Walker, EEG      | *ED |
| S. Webb, EEG        | *ED |
| D. Winters, DNFSB   | *ED |
| P. Roush, WTS       |     |
| T. Bowden, CTAC     |     |
| A. Pangle, CTAC     |     |
| J. Schuetz, CTAC    |     |
| CBFO QA Record File |     |
| CBFO M&R            |     |

\*ED denotes electronic distribution

020713



## CORRECTIVE ACTION REPORT

|  |   |                     |
|--|---|---------------------|
| 1. CAR No.: 02-069   | 2. Activity Report No.: A-02-23   | 3. Page <u>1</u> of |
| 4. Controlling Document: See Block 4 of Continuation Sheet   | 5. CBFO Assessment Team Leader: Ava Holland   |                     |
| 6. Responsible Organization: Hanford -RL   | 7. CAQ Was Discussed With: R. R. Bloom, P. J. Crane, K. M. Leonard, and D. Richards |                     |
| 8. Requirement that was violated: Failure to follow procedures as required by DOE/WIPP 02-3183, Revision 0, Interim Change 1, <i>CH Packaging Program Guidance</i> , DOE/WIPP 02-3184, Revision 0, <i>CH Packaging Operations Manual</i> and Hanford Procedure WRP1-OP-0524, Rev/Change C-0, <i>Helium Leak Test of the TRUPACT-II Shipping Container</i> . See Block 8 of CAR Continuation Sheet for specific requirements. |   |                     |
| 9. Condition Adverse to Quality: Non-compliance with procedural sequential steps during minor TRUPACT-II maintenance, loading payload assembly into the TRUPACT-II, closure of TRUPACT-II Outer Containment Vessel (OCV), and leak testing of the TRUPACT-II OCV. See Block 9 of the CAR Continuation Sheet for specific procedure non-compliances.  |   |                     |
| 10. Suggested Actions (Optional): However, no TRU Waste should be loaded into a TRUPACT-II until corrected   |   |                     |
| 11a. Significant CAQ (Yes):  |   |                     |
| 11b. Work Suspension Recommended (No):   |   |                     |
| 11c. RCRA-Related (No):  |   |                     |
| 11d. Accelerated Corrective Action Required (Yes):   |   |                     |
| 12. Types of Actions: Remedial: <input checked="" type="checkbox"/> Investigative: <input checked="" type="checkbox"/> Root Cause: <input checked="" type="checkbox"/> Actions to Preclude Recurrence: <input checked="" type="checkbox"/>   |   |                     |
| 13. CAR Initiator: <u>J. Willis/T. Sellmer/D. Scott</u> Date: <u>06/28/02</u>  |   |                     |
| 14. Response Due Date: <u>7/22/02</u> Corrective Action Plan Required: YES<br>Required Corrective Action Completion Date: <u>7/22/02</u>   |   |                     |
| 15. a. Concurrence: <u>Ava L. Holland</u> <u>7/8/02</u> b. <u>N/A</u> _____<br>Assessment Team Leader Date Responsible Assistant Manager Date  |   |                     |
| c. <u>Ava L. Holland</u> <u>7/8/02</u><br>Quality Assurance Manager Date   |   |                     |
| 16. Corrective Actions Proposed by the Responsible Organization: Use CAR Continuation Sheet  |   |                     |
| 17. Acceptance of Proposed Corrective Actions:<br>_____<br>Assessment Team Leader Date   |   |                     |
| 18. Verification of Corrective Action Completion: (Use CAR Continuation Sheet)   |   |                     |
| 19a. Verified By: _____<br>Name Date   |   |                     |
| 19b. Trend Cause Code: _____   |   |                     |
| 20. Closure: _____<br>Quality Assurance Manager Date   |   |                     |

# CBFO CORRECTIVE ACTION REPORT

(continuation sheet)

1. CAR No. 02-069

2. Activity No.: A-02-23

3. Page 2 of    

## Block 4 Controlling Documents continued:

1. DOE/WIPP 02-3183, Revision 0, Interim Change 1, *CH Packaging Program Guidance*
2. DOE/WIPP 02-3184, Revision 0, *CH Packaging Operations Manual*
3. Hanford Procedure WRP1-OP-0524, Rev/Change C-0, *Helium Leak Test of the TRUPACT-II Shipping Container*

## Block 8 Requirements that were violated continued:

8a. DOE/WIPP 02-3183, Revision 0, Interim Change 1, *CH Packaging Program Guidance*, Attachment B – Approved Work Instructions, WI-CH.01, *Replacement of ICV/OCV Small Plugs, O-Rings, and Gaskets*, General Requirements, second bullet states: “Always replace the O-Ring or gasket if the plug or cover is replaced.” See Item 9a. below for specific violation of stated requirement.

8b. DOE/WIPP 02-3184, Revision 0, *CH Packaging Operations Manual*, Section 1.1 Purpose, second paragraph states in part: “This document details the instructions to be followed to operate, maintain, and test the TRUPACT-II and HalfPACT packaging. The intent of these instructions is to standardize operations. All users will follow these instructions or equivalent instructions that assure operations are safe and meet the requirements of the SARPs.”

DOE/WIPP 02-3184, Revision 0, *CH Packaging Operations Manual*, “NOTE” prior to Step 2.1 defines areas in which steps may be performed out of sequence and states: “Transport trailer operations, package loading and unloading from transport trailers, hoisting and rigging, equipment checkout and shutdown, and component inspection activities must be performed, but may be performed in any order as long as radiological control steps are not bypassed.” This “NOTE” does not allow out of sequence operations for payload assembly, TRUPACT-II operations, TRUPACT-II maintenance or TRUPACT-II leak testing. See Item 9b. below for specific violation of the stated steps and requirements.

8c. DOE/WIPP 02-3184, Revision 0, *CH Packaging Operations Manual*, “CAUTION” prior to Step 2.16.17 “Remove ACGLF/adaptor from payload.” States: “Operator shall verify two ACGLF counterweights are 180 degrees and 000 degrees BEFORE lifting ACGLF or lid.” This caution is intended to make sure that the ACGLF lifting legs or lid is not in bind when lifting the ACGLF and preventing the lid or lifting legs from swinging in a potential violent mode when lifting the ACGLF. See Item 9c. below for specific violation of the stated steps or requirement.

8d. DOE/WIPP 02-3184, Revision 0, *CH Packaging Operations Manual*, Step 2.18.13 “Disconnect vacuum vent line from vent port tool.” See Item 9d. below for specific violation of the stated steps and requirement.

8e. Hanford Procedure WRP1-OP-0524, Rev/Change C-0, *Helium Leak Test of the TRUPACT-II Shipping Container*, Step 6.4.16b states: “MONITOR MSLD to ensure helium signal has stabilized at  $2.6 \times 10^{-7}$  atm-cc/sec or less. Step 6.4.16c. states: “WHEN at least 3 minutes have passed NOTE MSLD reading on OCV NDE Calculation Worksheet.” See Item 9e. below for specific violation of the stated steps or requirement.

# CBFO CORRECTIVE ACTION REPORT

(Continuation Sheet)

|                   |                                |                    |
|-------------------|--------------------------------|--------------------|
| 1. CAR No. 02-069 | 2. Activity Report No. A-02-23 | 3. Page 3 Of _____ |
|-------------------|--------------------------------|--------------------|

**Block 9 Conditions Adverse to Quality continued:**

9a. A new Outer Containment Vessel (OCV) Vent Port Plug was installed to replace a damaged OCV Vent Port Plug. However, a new Vent Port Plug O-Ring seal was not installed as required by the Approved Work Instruction in Item 8a. above.

9b. During the audit A-02-23 TRUPACT-II operations demonstration, Step 2.18.10 "Rotate OCV lock ring to the LOCKED position." Was performed immediately after completion of Step 2.18.5 "Install OCA lid onto OCA Body." These bypassed Steps 2.18.6 through 2.18.9 allow evacuation of the OCV to 3-in. Hg vacuum minimum to allow easier rotation of the OCV lid to prevent damage to the OCV mating surfaces and OCV lid rotational stops. Not performing Step 2.18.6 through Step 2.18.9 allowed the OCV lid to be rotated to the LOCKED position without vacuum in the OCV, creating the potential for damage to the OCV vessel and lid surfaces and potential damage to the OCV stop block.

9c. The CAUTION prior to Step 2.16.17, "CAUTION" prior to Step 2.16.17, "Operator shall verify two ACGLF counterweights are 180 degrees and 000 degrees BEFORE lifting ACGLF or lid." was not performed until brought to the attention of the Lead Technician by an audit team member after the ACGLF and long lifting legs were set in the storage fixture on the floor.

9d. The OCV vent port tool was removed from the vent port after Step 2.18.13, "Disconnect vacuum line from vent port tool." was performed. There is no step for vent port tool removal at this point since the vent port tool will be needed for future operations.

9e. The Level II Leak Test Technician performing the test of the OCV Vent Port Plug Seal initiated the three minute dwell time prior to the helium signal stabilizing at  $2.6 \times 10^{-7}$  atm-cc/sec or less. Dwell time was initiated when the helium signal from the MSLD was at  $7.6 \times 10^{-7}$  atm-cc/sec or less.

## CORRECTIVE ACTION REPORT

|   |   |                                   |
|---|---|-----------------------------------|
| <b>1. CAR No.:</b> 02-070   | <b>2. Activity Report No.:</b> A-02-23                                    | <b>3. Page</b> <u>1</u> <b>of</b> |
| <b>4. Controlling Document:</b> WRP1-OP-0908, and WAP B1-3a   | <b>5. CBFO Assessment Team Leader:</b> A. L. Holland                      |                                   |
| <b>6. Responsible Organization:</b> Hanford - RL  | <b>7. CAQ Was Discussed With:</b> D. DeRosa, W. Thackaberry, and P. Crane |                                   |
| <b>8. Requirement that was violated:</b> WRP1-OP-0908, Sec. 6.8 Note: "A complete radiography examination is defined as using RTR to review the entire contents of the waste container..." WAP B1-3a "Containers with lead liners, or other containers whose contents prevent full examination of the remaining contents, shall be subject to visual examination."  |   |                                   |
| <b>9. Condition Adverse to Quality:</b> Two drums were examined which had leaded rubber gloves. These drums could not be completely examined since the mass of gloves was impenetrable. Container RH-A-86-001 (Batch WR-TB-2001-058) contained leaded rubber gloves that were grouped together in the center of the drum and the mass was impenetrable. Container RH-A-91-008 (Batch WR-TB-2001-081) contained two bags filled with leaded rubber gloves. The two bags were pushed to the bottom of the drum and the mass of gloves could not be penetrated, and thereby prohibiting full examination of the contents of the container. |   |                                   |
| <b>10. Suggested Actions (Optional):</b>  |   |                                   |
| <b>11a. Significant CAQ</b>   | (Yes or No): <b>Yes</b>   |                                   |
| <b>11b. Work Suspension Recommended</b>   | (Yes or No): <b>No</b>  |                                   |
| <b>11c. RCRA-Related</b>  | (Yes or No): <b>Yes</b>   |                                   |
| <b>11d. Accelerated Corrective Action Required</b>  | (Yes or No): <b>Yes</b>   |                                   |
| <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> <u>K. Gaydosh A E Bradford for</u> <b>Date:</b> <u>06/28/02</u>   |   |                                   |
| <b>14. Response Due Date:</b> <u>7/22/02</u> <b>Corrective Action Plan Required:</b> <b>YES</b><br><b>Required Corrective Action Completion Date:</b> <u>8/7/02</u>   |   |                                   |
| <b>15. a. Concurrence:</b> <u>Ava L. Holland</u>  | <u>7/8/02</u>   | <b>b. N/A</b>                     |
| Assessment Team Leader  | Date  | Responsible Assistant Manager     |
| Date  |   |                                   |
| <b>c. Ava L. Holland</b>  | <u>7/8/02</u>   |                                   |
| Quality Assurance Manager   | Date  |                                   |
| <b>16. Corrective Actions Proposed by the Responsible Organization:</b> Use CAR Continuation Sheet  |   |                                   |
| <b>17. Acceptance of Proposed Corrective Actions:</b>   |   |                                   |
| _____   | _____   |                                   |
| Assessment Team Leader  | Date  |                                   |
| <b>18. Verification of Corrective Action Completion: (Use CAR Continuation Sheet)</b>   |   |                                   |
| <b>19a. Verified By:</b> _____  |   |                                   |
| Name  | Date  |                                   |
| <b>19b. Trend Cause Code:</b> _____   |   |                                   |
| <b>20. Closure:</b> _____   |   |                                   |
| Quality Assurance Manager   | Date  |                                   |

# CBFO CORRECTIVE ACTION REPORT

(continuation sheet)

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