

United States Government

Department of Energy

# memorandum

 Carlsbad Field Office  
 Carlsbad, New Mexico 88221

DATE: November 1, 2002

 REPLY TO  
 ATTN OF: CBFO:QA:DSM:GS:02-1946:UFC 2300.00

SUBJECT: Evaluation of Revised Corrective Action Plans for Corrective Action Reports 02-090, 02-091, 02-092, 02-094 and 02-095

TO: Dave Haar, WTS/CCP

The Carlsbad Field Office has evaluated the revised Corrective Action Plans for the subject Corrective Action Reports (CARs). The results of the evaluation indicate that WTS/CCP has adequately addressed the issues identified in the CARs 02-090, 02-091, 02-092, 02-094 and 02-095. The evaluation results are documented on the attached CAR Continuation Sheets.

To expedite the verification process please advise CBFO and provide documented confirmation when all actions contained within the corrective action plans have in fact been completed.

If you have any questions or comments, please contact me at (505) 234-7491.

Dennis S. Mienls  
 Quality Assurance Specialist



## Attachment

cc: w/attachment	
B. Bennington, CBFO	*ED
K. Watson, CBFO	*ED
A. Pangle, CTAC	*ED
E. Bradford, CTAC	*ED
M. Eagle, EPA	*ED
E. Feltcorn, EPA	*ED
R. Joglekar, EPA	*ED
S. Zappe, NMED	*ED
B. Walker, EEG	*ED
D. Winter, DNFSB	*ED
P. Roush, WTS	
CBFO QA File	
CBFO M&RC	

021104



# CBFO CORRECTIVE ACTION REPORT

(continuation sheet)

1. CAR No.: 02-090

2. Activity No.: A-02-03

3. Page 1 of 1

Block # 17 Acceptance of Proposed Corrective Action

The following is an evaluation of the revised response to CBFO CAR 02-090 (identified during Audit A-02-03) as submitted via TRU Solutions letter dated October 29, 2002 (TP:02:02402, UFC: 2300.00), from D. H. Haar to D. S. Miehl.

The proposed corrective actions, (remedial, investigative, root cause and actions to preclude recurrence) for the Conditions Adverse to Quality described in the CBFO CAR are acceptable.

Upon completion of all corrective action(s) as described in the response, WTS/CCP is to notify and submit documentation supporting closure, to the CBFO quality assurance specialist (D. S. Miehl) so that verification activities may be scheduled and performed as soon as possible.

*A. E. Bradford for Tommy Putnam* 10/31/02  
Response Evaluated By: Tommy Putnam / Date

# CBFO CORRECTIVE ACTION REPORT

(continuation sheet)

1. CAR No.: 02-091

2. Activity No.: A-02-03

3. Page 1 of 1

## Block # 17 Acceptance of Proposed Corrective Action

The following is an evaluation of the revised response to CBFO CAR 02-091 (identified during Audit A-02-03) as submitted via TRU Solutions letter dated October 29, 2002 (TP:02:02402, UFC: 2300.00), from D. H. Haar to D. S. Miehl.

The proposed corrective actions, (remedial, investigative, root cause and actions to preclude recurrence) for the Conditions Adverse to Quality described in the CBFO CAR are acceptable.

Upon completion of all corrective action(s) as described in the response, WTS/CCP is to notify and submit documentation supporting closure, to the CBFO quality assurance specialist (D. S. Miehl) so that verification activities may be scheduled and performed as soon as possible.

  
Response Evaluated By: Chet Wright / Date

10-31-02

# CBFO CORRECTIVE ACTION REPORT

(continuation sheet)

1. CAR No.: 02-092

2. Activity No.: A-02-03

3. Page 1 of 1

**Block # 17 Acceptance of Proposed Corrective Action**

The following is an evaluation of the revised response to CBFO CAR 02-092 (identified during Audit A-02-03) as submitted via TRU Solutions letter dated October 29, 2002 (TP:02:02402, UFC: 2300.00), from D. H. Haar to D. S. Miehl.

The proposed corrective actions, (remedial, investigative, root cause and actions to preclude recurrence) for the Conditions Adverse to Quality described in the CBFO CAR are acceptable.

Upon completion of all corrective action(s) as described in the response, WTS/CCP is to notify and submit documentation supporting closure, to the CBFO quality assurance specialist (D. S. Miehl) so that verification activities may be scheduled and performed as soon as possible.

A. Axinn 10/31/02  
Response Evaluated By: Annabelle Axinn / Date

Corrective Action Plan  
For  
Corrective Action Report (CAR): 02-092

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**A. Corrective Action Plan** (to include as appropriate)

An audio/videotape of the operator analysis (scan) of the data is not produced during real time operation of the DR/CT. The audio record is created after the DR/CT examination by the operator reading the radiography data form. The audio/videotape is required to be produced while the operator is analyzing the data to identify the waste items and estimate WMP weights.

**1. Remedial Action(s) Taken:**

DR/CT operations have been suspended until corrective actions are identified and implemented.

**2. Investigative Actions** (including extent and impact as applicable)

**2a. Extent:**

All drums analyzed by the DR/CT were completed using the discrepant methodology of producing the audio record.

**2b. Impact:**

An audio/video file record of the computed tomography scans on drums completed in DR/CT to date will have to be produced once the corrective actions have been completed. Existing Radiography Data Forms can then be updated with new information (e.g., new waste items or WMP weights) identified as a result of the production of the audio/video file production. New DR/CT scans of the drums completed to date will not be required as the existing scans can be used to produce the audio/video files.

**3. Root Cause of the Problem:**

4B Inadequate or Defective Design

**4. Actions to Preclude Recurrence:**

The following corrective actions will be implemented prior to scanning any new drums in DR/CT.

- A. BIR will procure the computer software and hardware to produce audio/video files in real time, in accordance with CCP software Quality Assurance and procurement procedures.

Corrective Action Plan  
For  
Corrective Action Report (CAR): 02-092

- B. CCP-TP-012 will be revised to reflect the production of audio/video files in real time as CT scans are analyzed by the operator. The procedure revision will also include the parallel development of the Radiography Data Form with the production of the audio/video file.
- C. The DR/CT operators will be trained on the process and content for the production of the audio/video files.
- D. NCR-ANLE-0506-02 was written by CCP to document the requirements to produce the audio/video files from the DR/CT, bound the population of the drums impacted, and track the completion of the required audio/video files.

Corrective actions are anticipated to be complete by November 1, 2002.

**Responsible Individual:** Dave Nisius

**Responsible CCP Manager:** Bob Billett

**Anticipated Completion Date:** November 1, 2002

**Corrective Action Plan Approval:**

<u>Dave Haar</u>	_____	_____
Central Characterization Project Manager	Signature	Date

**B. Corrective Action Completed**

**Letter Number Providing Statement of Completion (if used):** \_\_\_\_\_

**Corrective Action Completion Verified by (as assigned by the CCP Manager):**

_____	_____	_____
Name	Signature	Date

The above signature certifies/validates the contents of this document as authentic and complete.

**Methods of Verification:**

\_\_\_\_ Record Reviews

Corrective Action Plan  
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\_\_\_\_ Personnel Interviews (list the names and position titles of those interviewed in the comment section).

\_\_\_\_ Field Observation (list performance/activities observed in the comment section).

**Verification Comments** (use continuation pages if needed).

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**CONTINUATION PAGE:**



# CBFO CORRECTIVE ACTION REPORT

(continuation sheet)

1. CAR No.: 02-094	2. Activity No.: A-02-03	3. Page <u>1</u> of <u>1</u>
<p>Block # <u>17</u> Acceptance of Proposed Corrective Action</p> <p>The following is an evaluation of the revised response to CBFO CAR 02-094 (identified during Audit A-02-03) as submitted via TRU Solutions letter dated October 29, 2002 (TP:02:02402, UFC: 2300.00), from D. H. Haar to D. S. Miehl.</p> <p>The proposed corrective actions, (remedial, investigative, root cause and actions to preclude recurrence) for the Conditions Adverse to Quality described in the CBFO CAR are acceptable.</p> <p>Upon completion of all corrective action(s) as described in the response, WTS/CCP is to notify and submit documentation supporting closure, to the CBFO quality assurance specialist (D. S. Miehl) so that verification activities may be scheduled and performed as soon as possible.</p> <p> <sup>10/31/2</sup></p> <p>Response Evaluated By: James R. Schuetz / Date</p>		

# CBFO CORRECTIVE ACTION REPORT

(continuation sheet)

1. CAR No.: 02-095

2. Activity No.: A-02-03

3. Page 1 of 1

**Block # 17 Acceptance of Proposed Corrective Action**

The following is an evaluation of the revised response to CBFO CAR 02-095 (identified during Audit A-02-03) as submitted via TRU Solutions letter dated October 29, 2002 (TP:02:02402, UFC: 2300.00), from D. H. Haar to D. S. Miehl.

The proposed corrective actions, (remedial, investigative, root cause and actions to preclude recurrence) for the Conditions Adverse to Quality described in the CBFO CAR are acceptable.

Upon completion of all corrective action(s) as described in the response, WTS/CCP is to notify and submit documentation supporting closure, to the CBFO quality assurance specialist (D. S. Miehl) so that verification activities may be scheduled and performed as soon as possible.

*A. Axinn* 10/31/02  
Response Evaluated By: Annabelle Axinn / Date