memorandum

DATE: March 27, 2003

REPLY TO ATTN OF: CBFO:QA:MPN:GS:03-1110:UFC 2300.00

SUBJECT: Closure of Corrective Action Reports 03-039 and 03-040

TO: Brian Edgerton, DOE-ID
    Dary Newbry, DOE-ID

The Carlsbad Field Office (CBFO) performed verification of corrective action completion for Corrective Action Reports (CARs) 03-039 and 03-040. The corrective actions taken and implemented for these CARs have been evaluated and observed during a site visit on March 26, 2003. The results of the evaluation indicate that AMWTP has adequately addressed the issues identified in CARs 03-039 and 03-040 and has adequately implemented the corrective actions for these issues.

Based upon this evaluation it has been determined the AMWTP has implemented a satisfactory and effective transportation program. The audit team made three recommendations to AMWTP based upon the evaluation for closure of CAR 03-040. The recommendations are as follows:

1. Increase the thoroughness of TRUPACT-II welds and attachments inspections.
2. Improve cleaning of TRUPACT-II small parts (plugs, covers, and O-Rings).
3. Provide additional training to AMWTP leak-testers on calculating leak rates.

CARs 03-039 and 03-040 have been closed based on the CBFO verification of the corrective actions. The CAR continuation sheets documenting verification of corrective action completion and closure of the CARs are attached.

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

[Signature]

Martin P. Navarrete
Quality Assurance Specialist

Attachments
Block 18 Verification of Corrective Action Completion

BNFL issued P.O. ID031-0240 PRAXAIR Distribution Inc., 1380 North Skyline Drive, Idaho Falls, ID for procurement of UHP Helium. This PO states: "This helium must include a certificate of compliance which ties the helium to cylinder, lot, or batch number and the purchase order No. This information is required on the certificate in order to comply with the Waste Isolation Pilot Plant. The helium will be used for TRU/PACT Leak Testing and Shipping."

The CBFO Audit Team reviewed the above. PD, PR, Quality Claims, Receiving Inspection Report, Certificate of Conformance, installed helium bottles and configuration of helium piping and leak test system.

The CBFO Audit Team recommends closure of CAR 03-039.

Block 19a Verifier: [Signature]
Date: 3/8/03

Block 19b Trend Cause Code: 6.5, Policy not adequately defined, disseminated, or enforced.
<table>
<thead>
<tr>
<th>Block 18 Verification of Corrective Action Completion</th>
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<tbody>
<tr>
<td><strong>Remedial Actions:</strong></td>
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<tr>
<td>1. Revise INST-OI-20 and associated forms to clarify the sequence of steps to improve the process flow within the procedure. Objective evidence will include INST-OI-20, associated forms, and a summary of the specific document changes.</td>
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<tr>
<td>2. Transmit the revision of INST-OI-20 to WIPP for approval. Objective evidence will include the letters (email copies) transmitting the procedure to DOE-ID and WIPP.</td>
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<td>3. Perform a Root Cause Analysis investigation on the identified issues, INST-OI-20, and the associated training. AMWTP submitted a revised &quot;Investigation and Root Cause Analysis Report (AMWTP-ICA-03-001 dated 2/22/03). However, the audit team concluded the revised root cause analysis contains misleading and inaccurate statements. The audit team can only conclude that the root cause of AMWTP's failure to pass initial audit was insufficient training.</td>
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<td>4. Re-examine/review the Site Specific Leak Test exam against the INST-OI-20 changes, as appropriate. Obtain review and approval from Garry Elder for the exam changes. Objective evidence will include the revised Site Specific Leak Test exam, as appropriate. AMWTP letter dated 2/22/03 from Jeremy Hampton to Ken Harris wood concluded, &quot;... Changes made to INST-OI-20 do not affect the content of Site Specific Leak Test Exam (T-4408).&quot; As Jeremy Hampton this conclusion was discussed with Garry Elder.</td>
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<td>5. Brief Crews A and B on INST-OI-20 changes. The Subject Matter Expert will discuss the major changes associated with INST-OI-20 and associated forms, including:</td>
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<td>- Changes to the process path through the procedures</td>
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<td>- Changes regarding HLZ zero</td>
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<td>- Changes to specifications, inspections, and acceptance criteria</td>
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<td>- Changes to forms and documentation requirements</td>
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**AMWTP training rosters for A and B crews dated 3/22/03 and 3/20/03 respectively.**
|-------------------|-------------------------------|--------------|

6. Administer Site Specific Leak Test exam to each TRUPACT-II Operations Crew, as appropriate. Objective evidence will include training roster and results of Site Specific Leak Test exam, as appropriate. AMWTP concluded that procedure changes did not affect the content of Site Specific Leak Test Examination and no changes or training were performed on Site Specific Leak Test Exam.

7. Conduct Hands-On training with each TRUPACT-II Operations Crew. The Subject Matter Expert will supervise the sessions. The participants will:
   - Perform INST-OI-20 instructions under normal conditions, including response to abnormal conditions
   - Complete applicable forms and documentation and accurately complete calculations
   - Perform maintenance activities using work instructions
   - Perform Operational Checks and Examination, including:
     - Discussion/observation of the inspection weaknesses identified during the WIPP audit (ICV impact limiter screw)
     - Procedural requirements for inspections and corrective actions
     - Performance of required inspections with supervisory observation/discussion of the activity
   - Flow test leak detection tools

Objective evidence will include the training rosters.

AMWTP "Training Plan" and AMWTP Training Rosters dated 3/23/03 and 3/24/03.

8. Complete two days of Run Time with each TRUPACT-II Operations Crew. The run will be supervised by the On Duty Shift Team Leader. Participants will perform the procedure multiple times to gain experience and refine their skills, this will include practical demonstration of leak testing. During the Run Time, Subject Matter Expert and Operations Management, will be available to provide support, guidance and oversight. Objective evidence will include the training rosters.

AMWTP "Training Plan" and AMWTP Training Rosters dated 3/23/03 and 3/24/03

9. Develop and issue a qualification checklist supplement for QPOT07A, Packaging/Shipping/Storage, as necessary. Qualification supplement should include changes from the INST-OI-20 revision and the Root Cause Analysis report, as applicable. Objective evidence will include the qualification checklist supplement for QPOT07A, as appropriate.

AMWTP letter dated 3/24/03 from Jeremy Hampton to Ken Harwood concluded, "...changes do not require any additions or deletions from the Packaging/Shipping/Storage Qualification Checklist (QPOT07A). However, additional training was provided - see Item 7 & 8 above."
CBFO CORRECTIVE ACTION REPORT
(Continuation Sheet)

| CAR No. 03-040 | Activity Report No. A-03-08 | Page 3 of 4 |

**Investigative Actions:**

See Item 3 above. AMWTP developed a revised "Investigation and Root Cause Analysis Report (AMWTP-RCA-03-001 dated 3/25/03). However, the CBFO Audit team concluded the revised root cause analysis and the original root cause analysis reports contain misleading and inaccurate statements.

**Actions to Preclude Recurrence:**

1. Provide training and or briefing to procedure revisions and associated forms. Ensure that only those personnel with the appropriate approved training perform the required tasks. Objective evidence will be: A Document Change Request for outlining the procedural steps in INST-OI-20 will be available, indicating the sequence of obtaining and recording the HLD zero reading.

   See Items 1 and 2 of Remedial Actions above.

2. Ensure procedure revisions requiring changes in method or sequence for completion of tasks have been thoroughly field-tested. Objective evidence will be: INST-OI-20 and associated forms will be revised to clarify steps and organize the procedure to make it more useable by the operators.

   See Items 1, 2, 7, and 8 of Remedial Actions above.

3. Line management will conduct hands on training and or competency demonstrations required for TRUPACT-II operations tasks. Objective evidence will be: Training Rosters of the Technicians working in TRUPACT-II operations.

   See Items 5, 7 and 8 of Remedial Actions above.
Audit Team Evaluation of BNFL Performance

The CBFO Audit Team observed AMWTP operations disassemble, inspect, clean, reassemble, and leak-test a Training TRUPACT-II at the AMWTP Site on March 26, 2003. These operations were considered adequate, satisfactorily implemented, and effective. Based on AMWTP performance on March 26, 2003, the CBFO Audit Team recommends closure of CAR No. 03-040 and certification of AMWTP for TRUPACT-II Operations and Shipping. The CBFO Audit Team makes the following recommendations to AMWTP:

1. Increase thoroughness of TRUPACT-II welds and attachments.
2. Improve cleaning of TRUPACT-II small parts (plugs, covers, and 'O-rings').
3. Provide additional training to AMWTP leak-testers on calculating leak rates.

Block 19a Verifier: Dee Scott Joe Willis Todd Sellmer

Date: 3/27/03

Block 19b Trend Cause Code: 54 INSUFFICIENT ON-THE-JOB TRAINING.