



Department of Energy
Carlsbad Field Office
P. O. Box 3090
Carlsbad, New Mexico 88221
September 22, 2003



ENTERED



Mr. Dave Haar
Washington TRU Solutions
P.O. Box 2078
Carlsbad, NM 88331-2078

RE: Issuance of Corrective Action Reports Initiated During Audit A-03-25

Dear Mr. Haar:

The Carlsbad Field Office (CBFO) performed Audit A-03-25 of the Hanford/CCP APL Site, on September 8-11, 2003. CBFO Corrective Action Reports (CARs) 03-081 and 03-082 are enclosed.

Please document on the enclosed 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) 234-7491.

Sincerely,

Dennis S. Miehl
Quality Assurance Specialist

Enclosure

cc: w/enclosure
M. Navarrete, CBFO*ED
K. Watson, CBFO *ED
T. Harms, DOE-HQ *ED
M. French, DOE-RL *ED
M. Eagle, EPA *ED
E. Felcorn, EPA *ED
R. Joglekar, EPA *ED
B. Walker, EEG *ED
S. Zappe, NMED *ED
S. Holmes, NMED *ED
D. Winters, DNFSB *ED
A. Axinn, CTAC *ED
A. Pangle, CTAC *ED
K. Dunbar, WRES
CBFO QA File
CBFO M&RC

*ED denotes electronic distribution
CBFO:QA:DSM:GS:03-2574:UFC 2300.00

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CORRECTIVE ACTION REPORT

1. CAR No.: 03-081	2. Activity Report No.: A-03-25	3. Page <u>1</u> of <u>2</u>
4. Controlling Document: CCP-TP-005	5. CBFO Assessment Team Leader: D. Miehlis	
6. Responsible Organization: Hanford, CCP	7. CAQ Was Discussed With: Kevin Peters	
8. Requirement that was violated: See continuation sheet		
9. Condition Adverse to Quality: The defense determination in the Kerr McGee AK Summary document needs additional supporting documentation to demonstrate that the waste was generated from or by defense activities or is commingled with defense waste. The documentation needs to include complete information on how the production of mixed oxide fuel for the FFTF, Zero Power Plutonium Reactor and other "various government research and development programs" ¹ relate to defense work and therefore defense waste. I-AK Source Document Summary U001		
10. Suggested Actions (Optional):		
11a. Significant CAQ	(Yes or No):	
11b. Work Suspension Recommended	(Yes or No):	
11c. RCRA-Related	(Yes or No):	
11d. Accelerated Corrective Action Required	(Yes or No):	
12. Types of Actions: Remedial: <input checked="" type="checkbox"/> Investigative: <input checked="" type="checkbox"/> Root Cause: _____ Actions to Preclude Recurrence: _____		
13. CAR Initiator: <u>D. Blauvelt/P. Dugger</u> Date: <u>09/16/03</u>		
14. Response Due Date: <u>10-7-03</u> Corrective Action Plan Required: <input checked="" type="checkbox"/> YES NO Required Corrective Action Completion Date: <u>10-23-03</u>		
15. a. Concurrence: <u>[Signature]</u>	<u>7-22-03</u>	b. <u>N/A</u>
Assessment Team Leader	Date	Responsible Assistant Manager
c. <u>N/A</u>		
Quality Assurance Manager	Date	
16. Corrective Actions Proposed by the Responsible Organization: Use CAR Continuation Sheet		
17. Acceptance of Proposed Corrective Actions: _____ Date _____ Assessment Team Leader		
18. Verification of Corrective Action Completion: (Use CAR Continuation Sheet)		
19a. Verified By: _____	_____	_____
Name	Date	
19b. Trend Cause Code: _____		
20. Closure: _____		
Quality Assurance Manager	Date	

CLFO CORRECTIVE ACTION REPORT

(continuation sheet)

1. CAR No.: 03-081

2. Activity No.: A-03-25

3. Page 2 of 2

Block # 8

WAC, DOE/WIPP-02-3122, Section 3.1.5

The DOE and its predecessor agencies were engaged in a broad range of activities that fall under the heading of atomic energy defense activities. A TRU waste is eligible for disposal at WIPP if it has been generated in whole or in part by one or more of the following functions:

- Naval reactors development
- Weapons activities, including defense inertial confinement fusion
- Verification and control technology
- Defense nuclear materials productions
- Defense nuclear waste and materials by-products management
- Defense nuclear materials security and safeguards and security investigations
- Defense research and development

Using AK, DOE sites must determine that each waste stream to be disposed of at WIPP is "defense" TRU waste.

CORRECTIVE ACTION REPORT

1. CAR No.: 03-082	2. Activity Report No.: A-03-25	3. Page <u>1</u> of <u>2</u>
4. Controlling Document: : CCP-PO-001, Rev. 6		5. CBFO Assessment Team Leader: D. S. Michls
6. Responsible Organization: : Hanford CCP		7. CAQ Was Discussed With: K. Simpson
8. Requirement that was violated: <p style="text-align: center;">See Continuation Page</p>		
9. Condition Adverse to Quality: <p style="text-align: center;">See Continuation Page</p>		
10. Suggested Actions (Optional):		
11a. Significant CAQ (Yes or No): No		
11b. Work Suspension Recommended (Yes or No): No		
11c. RCRA-Related (Yes or No): No		
11d. Accelerated Corrective Action Required (Yes or No): No		
12. Types of Actions: Remedial: <input checked="" type="checkbox"/> Investigative: <input checked="" type="checkbox"/> Root Cause: _____ Actions to Preclude Recurrence: <input checked="" type="checkbox"/>		
13. CAR Initiator: Karen Gaydosh/Amy Arceo		Date: 9/16/03
14. Response Due Date: <u>10-7-03</u> Corrective Action Plan Required: <input checked="" type="radio"/> YES <input type="radio"/> NO		
Required Corrective Action Completion Date: <u>10-23-03</u>		
15. a. Concurrence: <u>D. S. Michls</u> <u>9-22-03</u>		b. <u>N/A</u>
Assessment Team Leader	Date	Responsible Assistant Manager
c. <u>N/A</u>		Date
Quality Assurance Manager		
16. Corrective Actions Proposed by the Responsible Organization: Use CAR Continuation Sheet		
17. Acceptance of Proposed Corrective Actions:		
Assessment Team Leader		Date
18. Verification of Corrective Action Completion: (Use CAR Continuation Sheet)		
19a. Verified By: _____		_____
Name		Date
19b. Trend Cause Code: _____		
20. Closure: _____		
Quality Assurance Manager		Date

CBFO CORRECTIVE ACTION REPORT

(continuation sheet)

1. CAR No.: 03-082	2. Activity No.: A-03-25	3. Page <u>2</u> of <u>2</u>
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Block # 8. Requirement that was violated:

CBFO QAPD, Revision 5, Section 1.2.2, Training Requirements, states in part: "... Management shall: A. Ensure that personnel receive indoctrination and training, including on-the-job and hands-on training, as needed, to achieve initial proficiency; maintain proficiency; and adapt to changes in technology, methods, job responsibilities, and quality assurance implementing procedures, prior to performing any tasks subject to the QAPD."

CCP-PO-001, *CCP TRU Waste Characterization Quality Assurance Project Plan*, Rev. 6, Section B1-3b states in part; "The training program includes items required by the CCP-QP-002, *CCP Training and Qualification Plan* and the required elements listed below...B1-3b(2) On-the-Job Training

- System Operation...
- Identification of Prohibited Items

To qualify, candidate radiographers must successfully analyze a radiography test drum initially (prior to analyzing drums in a particular waste stream for disposal characterization) and at least biannually thereafter. The test drum includes items common to the waste streams and representative of the waste matrix code to be characterized by CCP...The following is a list of required elements for radiography test drums that must be successfully identified by the operator for qualification:

- Aerosol can with puncture
- Horsetail bag
- Pair of coveralls
- Empty bottle
- Irregularly shaped pieces of wood
- Empty one-gal. paint can
- Full container
- Aerosol can with fluid
- One gal. bottle with three tablespoons of fluid
- One gal. bottle with one cup of fluid (upside down)
- Leaded glove or leaded apron
- Wrench

Qualification of radiography operators, at a minimum, encompasses the following:

- Successfully pass a comprehensive exam based upon training enabling objectives. The exam addresses all of the radiography operation, documentation, characterization, and procedural elements stipulated in this QAPJP
- Perform practical capability demonstration in the presence of an appointed site radiography subject matter expert (SME). This person is an experienced radiography operator who is qualified as an OJT trainer."

CCP-QP-002, Rev. 13, *CCP Training and Qualification Plan*, Section 4.2.2 [C.3] Nondestructive Examination (NDE) Real-time Radiography (RTR) Operator/TTR, states in part

"To be considered for certification as a Level II NDE RTR Operator/TTR, the trainee must complete the following:

- (a) Pass the required examinations in Section 4.2.2[E].
- (b) OJT knowledge and practical requirements on the site specific qualification card...
- (d) Perform an initial capability demonstration to identify prohibited items within a test drum."

Block #9. Condition Adverse to Quality:

During a review of a Real-time Radiography (RTR) videotape of a training examination of a test drum, a subject matter expert (SME) coached an RTR operator during the examination, thereby rendering the operator's ability to independently identify required elements in question.

The examination was performed on Test Drum number 9903393 on July 17, 2003. The examination in question is the first operator.