



**Department of Energy**  
Carlsbad Field Office  
P. O. Box 3090  
Carlsbad, New Mexico 88221  
September 29, 2003



Ms. Elizabeth Forinash  
Center for Federal Regulations (6608J)  
Office of Radiation and Indoor Air  
U.S. Environmental Protection Agency  
501 3rd Street, NW  
Washington, DC 20001

Subject: Issuance of Corrective Action Report 03-083 as a Result of Audit A-03-27  
Conducted September 23-36, 2003

Dear Ms. Forinash:

The Carlsbad Field Office (CBFO) has issued Corrective Action Report 03-083 documenting the failure of the Los Alamos National Laboratory (LANL) Non-Destructive Assay (NDA) operations to follow LANL implementing procedures and DOE/WIPP-02-3122, *Waste Acceptance Criteria*, Appendix A.3. Investigative actions have been initiated and we will promptly disclose identified impacts to containers already emplaced in the Waste Isolation Pilot Plant (WIPP) as soon as the information is confirmed. Since this condition adverse to quality was identified by the CBFO audit team, LANL has suspended NDA, certification, and shipping operations.

If you have any questions or comments, please contact Kerry Watson at (505) 234-7357 or me at (505) 234-7300.

Sincerely,

*/s/ signature on file*  
Dr. Inés R. Triay  
Manager

Enclosure

cc: w/enclosure  
L. Chism, CBFO  
E. Felcorn, EPA  
M. Eagle, EPA  
R. Joglekar, EPA  
A. Pangle, CTAC  
CBFO QA File  
CBFO M&RC



# CORRECTIVE ACTION REPORT

1. CAR No.: 03-083	2. Activity Report No.: A-03-027	3. Page <u>1</u> of
4. Controlling Document: TWCP-DTP-1.2-059, R.2, TWCP-DTP-1.2-060, R.1, DOE-WIPP 02-3122 (WAC) Appendix A.3	5. CBFO Assessment Team Leader: Lea Chism	
6. Responsible Organization: LANL	7. CAQ Was Discussed With: Sandy Wander	
8. Requirement that was violated: (a) TWCP-DTP-1.2-059, R.2 section 1.0 "The HENC data collection and analysis is not limited to specific waste types or waste streams. However, the mass results must be within calibration range for the analysis method used." (b) TWCP-DTP-1.2-060, R.1 section 2.0 "Calibration and quality assurance (QA) performance testing must be completed prior to performing any TWCP certification assays of waste drums. Remedial action must be taken before the HENC is used to assay waste drums if the calibration or QA test results do not fall within acceptable limits." (c) DOE-WIPP 02-3122 (WAC) Appendix A.3, The range of applicability of system calibrations must be specified in site procedures		
9. Condition Adverse to Quality: Contrary to the referenced procedure and WAC requirements nondestructive assay measurements outside the calibration range of the HENC were used to certify waste containers.		
10. Suggested Actions (Optional):		
11a. Significant CAQ (Yes or No): Yes 11b. Work Suspension Recommended (Yes or No): No 11c. RCRA-Related (Yes or No): No 11d. Accelerated Corrective Action Required (Yes or No): 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>Patrick Kelly/Chet Wright</u> Date: <u>09/29/03</u>		
14. Response Due Date: <u>10-16-03</u> Corrective Action Plan Required: <u>YES</u> Required Corrective Action Completion Date: <u>10-28-03</u>		
15. a. Concurrence: <u>Lea Chism</u> <u>09/29/03</u> b. <u>N/A</u> <small>Assessment Team Leader Date Responsible Assistant Manager Date</small> c. <u>Ava Holland</u> <u>9/29/03</u> <small>Quality Assurance Manager Date</small>		
16. Corrective Actions Proposed by the Responsible Organization: <u>Use CAR Continuation Sheet</u>		
17. Acceptance of Proposed Corrective Actions:		
_____ <small>Assessment Team Leader Date</small>		
18. Verification of Corrective Action Completion: (Use CAR Continuation Sheet)		
19a. Verified By: _____ <small>Name Date</small>		
19b. Trend Cause Code: _____		
20. Closure: _____ <small>Quality Assurance Manager Date</small>		