

United States Government


 Department of Energy

memorandum

 Carlsbad Field Office
 Carlsbad, New Mexico 88221


DATE: JUN 24 2004

 REPLY TO
 ATTN OF: CBFO:QA:MN:GS:04-1536:UFC 2300.00

SUBJECT: Issuance of the Corrective Action Report Initiated During Audit A-04-19

TO: Mark S. French, DOE-RL

The Carlsbad Field Office (CBFO) performed Audit A-04-19 of the Hanford Site on June 14-18, 2004. CBFO Corrective Action Report (CAR) 04-030 is attached.

Please document on the attached CAR continuation sheet per the attached instructions 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 this CAR require accelerated corrective action and 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 Navarrete
 Quality Assurance Specialist

Attachments

cc: w/attachments
 A. Holland, CBFO *ED
 M. Navarrete, CBFO *ED
 K. Watson, CBFO *ED
 R. Knerr, CBFO *ED
 G. Higgins, DOE-RL *ED
 D. DeRosa, FH *ED
 R. Dunn, FH *ED
 S. Bisping, FH *ED
 M. Eagle, EPA *ED
 S. Zappe, NMED *ED
 D. Winters, DNFSB *ED
 P. Rodriguez, CTAC *ED
 A. Pangle, CTAC *ED
 L. Greene, WRES *ED
 WIPP Operating Record, MS 486-06
 CBFO QA File
 CBFO M&RC

040631



CORRECTIVE ACTION REPORT

1. CAR No.: 04-030	2. Activity Report No.: A-04-19	3. Page <u>1</u> of <u>2</u>
4. Controlling Document: WMP-400 Section 7.1.9	5. CBFO Assessment Team Leader: Martin Navarrete	
6. Responsible Organization: AK, Hanford Site	7. CAQ Was Discussed With: S. W. Bisping	
8. Requirement that was violated: 1) WAP B4-3e states: Accuracy is the degree of agreement between an observed sample result and the true value. The percentage of waste containers which require reassignment to a new Waste Matrix Code and/or designation of different hazardous waste codes based on the reevaluation of acceptable knowledge or on obtaining sampling and analysis data will be reported as a measure of acceptable knowledge accuracy. (See Continuation Sheet)		
9. Condition Adverse to Quality: During the review of AK objective evidence the following conditions adverse to quality were identified in relation to the performance of RTR for confirmation of AK: (See Continuation Sheet)		
10. Suggested Actions (Optional): (See continuation sheet)		
11a. Significant CAQ	(Yes or No): Yes	
11b. Work Suspension Recommended	(Yes or No): No	
11c. RCRA-Related	(Yes or No): Yes	
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>Dick Blauvelt/Jeff May</u> Date: <u>6/23/04</u>		
14. Response Due Date: ^{MSM 6-25-04} <u>07/09/03 04</u> Corrective Action Plan Required: <u>YES</u> Required Corrective Action Completion Date: <u>7/23/04</u>		
15. a. Concurrence: <u>Martin Navarrete</u> <u>6-24-04</u> b. <u>N/A</u> Assessment Team Leader Date Responsible Assistant Manager Date c. <u>[Signature]</u> <u>6/24/04</u> Quality Assurance Manager Date		
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 04-030

2. Activity No.: A-04-19

3. Page 2 of 2

Block # 8. Requirement that was violated: (Continued)

2) WMP-400 Section 7.1.9 Paragraph 4.3.2 q states:

"Upon review of the AK information, perform the following activities, and document in an AK Summary Report:

- q. Determine whether the waste contains the following prohibited items:
- Liquids
 - Corrosives
 - Reactives
 - Ignitables
 - Pyrophorics
 - Explosives
 - Compressed gases
 - Sealed containers > 4L (excluding heat-sealed bags as identified in subsection 4.3.2 n)
 - Pressurized containers
 - Polychlorinated biphenyl (PCB) contamination
 - Non-mixed hazardous waste
 - Incompatible materials with WIPP panel closure, backfill, or seal materials."

Block # 9. Condition Adverse to Quality: (Continued)

- RTR is identifying drums containing such items as, penlight w/batteries, light bulbs and fuses, floodlight bulbs, and lead gloves that AK had placed in the non-mixed PFP waste stream, NPUREXD. Hanford generated NCRs to address moving the affected drums from the non-mixed waste stream to the mixed waste stream (MPUREXD) and adding new hazardous waste numbers. However, Hanford does not include these drums in the calculation of AK accuracy (Hanford AK Performance Report) as required by WAP B4-3e and Hanford procedure WMP-400 Section 7.1.9 para. 4.6.8c.

This condition adverse to quality relates to the condition documented on CBFO CAR 03-064 (closed 7/29/03). Hanford completed all corrective actions and submitted satisfactory objective evidence, however, due to a misunderstanding as to the point within the certification process at which AK accuracy was performed, this issue is on going.

- Historical RTR data for containers in both mixed and non-mixed debris streams from Purex and PFP has been reviewed as a source of AK information. However, the information contained in this historical data is not in all cases consistent with the presence or absence of prohibited items as documented in the Waste Stream Summaries.

INSTRUCTIONS FOR PROVIDING CORRECTIVE ACTION RESPONSE

WASTE ISOLATION PILOT PLANT
U.S. DEPARTMENT OF ENERGY
Carlsbad Field Office

CAR NO: _____
PAGE _____ OF _____

INSTRUCTIONS FOR COMPLETING A CORRECTIVE ACTION RESPONSE TO A CAR ADDRESSING A CONDITION ADVERSE TO QUALITY

You are requested to provide a corrective action in response to this corrective action report (CAR) by the due date identified in block 14 of the CAR. If this date cannot be met, provide a written request for extension to the assessment team leader (block 5). This request must include justification for the delay and must be provided prior to the due date.

The response shall address the corrective actions indicated in block 12. As appropriate, develop the response in accordance with the following sequence and format:

In order to develop the CAR response, perform an investigative action to determine the extent and impact of the deficiency and to identify the root cause. Next, determine the actions required to correct the adverse condition. The response shall include the following information, as appropriate to block 12.

1. Corrective action response for CAR # _____
 - A. **Remedial Action**-Describe actions required or taken to correct the specific conditions noted and any similar conditions identified during the investigations.
 - B. **Extent and Impact of the Deficiency**-Describe the investigative actions performed to determine the extent and impact of the condition and the results. This will include a determination of the acceptability of any data generated prior to resolution of the deficiency.
 - C. **Root Cause Determination**-Identify the root cause of the condition as determined through investigative action.
 - D. **Corrective Action to Preclude Recurrence**-Identify the actions required to address the root cause of the condition in order to preclude recurrence.
2. For each action above, identify the individual assigned responsibility for completion of the action and the anticipated (or actual, if complete) completion date.
3. The response must identify the individual having the overall responsibility for completion of the corrective actions.

CBFO CORRECTIVE ACTION REPORT

(Continuation Sheet)

1. CAR No.	2. Activity Report No. A-04-19	3. Page Of