

Steve Zappe

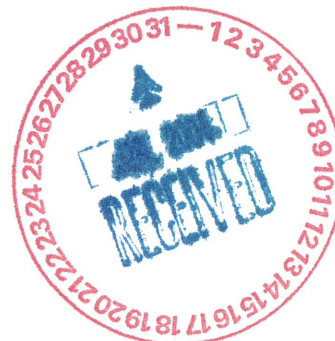
From: Holland, Ava - DOE [Ava.Holland@wipp.ws]
Sent: Friday, July 30, 2004 12:17 PM
To: Zappe, Steve
Subject: FW: Corrected CAR response



Importance: High



Corrected CAR
Response.pdf



-----Original Message-----

From: Elvin Dumas [mailto:edumas@bnflinc.com]
Sent: Tuesday, July 27, 2004 7:24 AM
To: ava.holland@wipp.ws; martin.navarrete@wipp.ws; kerry.watson@wipp.ws;
Edgerton, Brian G; wellsjl@inel.gov; David Swale; Alan J Dobson; Eric
Schweinsberg; taftra@id.doe.gov; bohrerha@id.doe.gov;
hernannk@id.doe.gov; jenkintw@id.doe.gov
Cc: Patricia Utley; Carl Smith; Chris Marden
Subject: Corrected CAR response
Importance: High

Please discard the Corrective action plan submitted late yesterday. The attached CAP is corrected and includes item (g) from Remedial Action 1 on page 2 of the continuation pages. This item was inadvertently omitted from the CAP sent for your review on 7/26/04. There are no other changes. I apologize for this oversight and inconvenience. Please call me at 208-680-3949 if you have any questions in review of this information.
Elvin

(See attached file: Corrected CAR
Response.pdf)



CBFO CORRECTIVE ACTION REPORT

(Continuation Sheet)

1. CAR No. 04-033

2. Activity Report No. N/A

3. Page 1 of 3 70

Immediate Actions:

BNFL Inc. has suspended data entry into the WWIS pending resolution of this condition adverse to quality.

Remedial Actions:

The following Remedial actions have been taken or identified for completion by BNFL Inc. in response to Items 1-5 from Block # 10 of CBFO CAR No. 04-033.

Action 1: "Locate and place into configuration control the list of 6751 drums originally part of the 3100m3 project's for First and Second Stage Sludges (WSP INW216) and the list of 6083 drums originally part of the 3100m3 project's for Building 374 Sludges (WSP INW218). A copy of this list must be provided to the CBFO."

Action 2: "Provide documented evidence to the CBFO of the traceability of these lists to the original sampling populations and efforts."

Action 5: "Determine the impact of this condition adverse to quality on waste containers that have been shipped to WIPP."

Remedial Corrective Action Response to Actions 1, 2 and 5:

1. BNFL Inc. has conducted a review of all containers from Waste Streams BNINW216 and BNINW218 that were identified in the handover of the above ground inventory received on December 31, 2002 and identified the drums that were originally part of the 3100m3 sample population. These were then compared to identify those containers held in BNFL above ground inventory that were not part of the 3100m3 project's sample population. This review was documented and resulted in the issuance on July 20, 2004 of BNFL Inc. Report Number BNFL-5232-RPT-TRUW-19, Revision 0 "Lot Population Determination for Waste Stream Profiles BNINW216 and BNINW218." This analysis was completed and documented through the following actions:
 - a) BNFL Inc. requested through AMWTP Request for Information 2004-04, a list of container identification numbers that comprised the 3100m3 project population of above ground inventory subject to random sample selection for waste streams WSP INW216 and WSP INW218. BBWI Engineering Design File EDF-909, Revision 3, "Transuranic Waste Sampling Plan for the Idaho National Engineering and Environmental Laboratory", effective 11/9/00 includes Table 1 "Summary of Target Waste Streams at the INEEL" which identifies the quantity of the population available for sampling of these two waste streams.
 - b) BNFL Inc. received a list of containers for each waste stream (i.e. WSP 216 and WSP 218) used to support WSP INW216 and WSP INW218, and the TRIPS database report, TCR 1-023 dated June 22, 2000 which was used to identify the available population in order to validate the traceability of the original container population identification numbers for these two waste streams. All container numbers were in the INEEL "IDRF" format.
 - c) After the original container population lists were validated against the TRIPS TCR 1-023 report, a comparison was completed against the BNFL Inc. inventory of waste received in the handover on December 31, 2002. The waste containers on the BNFL Inventory of waste were identified by their INEEL "IDRF" numbers. The BNFL Inc. comparison to the original population lists was then completed using the INEEL "IDRF" container format. A separate list was created from this comparison for each waste stream.

CBFO CORRECTIVE ACTION REPORT

(Continuation Sheet)

1. CAR No. 04-033

2. Activity Report No. N/A

3. Page 2 Of 3

Remedial Actions continued:

- d) After the definitive list of containers had been identified that were on both lists, (the Original lot list and the BNFL inventory list), the containers were then traced to their current BNFL container number. From this comparison, BNFL Inc. evaluated which containers were currently certified or shipped to determine which containers were not traceable to the original lot lists. This review concluded in the identification of the total of seventy-four WSPF 216 and twenty-nine WSPF 218 containers that have been shipped to WIPP that were not included in the original container sampling population during the 3100m3 project. This list is included in BNFL-5232-RPT-TRUW-19.
- e) The results of these BNFL Inc. analyses were included as configuration controlled Appendices A, B and C of BNFL-5232-RPT-TRUW-19. Additional Attachments supporting the results reported as Appendices A, B and C have also been included as configuration controlled lists in BNFL-5232-RPT-TRUW-19.
- f) BNFL-5232-RPT-TRUW-19 was internally reviewed and approved, and transmitted to the NE-ID Contracting Officer for transmittal to the CBFO on July 20, 2004.
- g) BNFL Inc. will review preliminary sampling results for these two waste streams to evaluate the impacts from the disposal of the containers identified in BNFL-5232-RPT-TRUW-19 Appendix C, at the WIPP Facility.

ACTION 1 items (a) through (f) COMPLETED ON JULY 20, 2004

ACTION 1 item (g) COMPLETION DATE: August 18, 2004

Action 3: "Physically or administratively segregate the actual BNINW216 and BNINW218 containers that were not available for sampling from the remaining containers within those waste streams."

Remedial Corrective Action Response to Action 3:

- 2. BNFL Inc. is identifying the lists of remaining containers for these waste streams that will then be attached to BNFL Inc. sampling plans as remaining populations of containers subject to random sample selection for solids analysis. For each waste stream, a definitive list will be produced of containers that can be traced back to the original 3100m3 project lists identified as "Lot 1", and which are still available at AMWTP for shipment to WIPP. Additionally, for each waste stream, lists will be prepared of those populations that are to be further sampled. These lists will be utilized to administratively segregate the different waste populations and will be maintained as configuration controlled lists.

ACTION 2 COMPLETION DATE: August 18, 2004

Action 4: "Determine if this condition adverse to quality applies to any other waste streams or waste stream lots."

Remedial Corrective Action Response to Action 4:

- 3. BNFL Inc. does not currently have any other approved waste streams authorized for certification that are impacted by this condition. Procedure revisions addressed in the Preventive Action of this Corrective Action Plan will identify and implement controls to prevent this condition adverse to quality for other waste streams in the future.

ACTION 3 COMPLETION DATE: August 18, 2004

CBFO CORRECTIVE ACTION REPORT

(Continuation Sheet)

1. CAR No. 04-033

2. Activity Report No. N/A

3. Page 3 Of 3

Investigative and Preventive Actions:

BNFL Inc. has contracted an Independent Consulting firm to conduct a formal investigation and causal analysis. The conclusions from this analysis will be evaluated by the Waste Programs Manager and the Site QA Manager to determine if additional corrective actions will be required, and this corrective action plan updated accordingly.

The following actions are being taken by BNFL Inc. in response to Items 6 and 7 from Block # 10 of CBFO CAR No. 04-033.

Action 6: "Provide CBFO verification from the Site Project Manager that the samples for the waste streams or waste stream lots were selected randomly based on information obtained during investigation of this condition adverse to quality."

4. BNFL Inc. is currently evaluating the documentation used in the 3100m3 project for response to item 6. This corrective action plan will be updated upon completion of this review.

ACTION 4 COMPLETION DATE: August 18, 2004

Action 7: "Implement an effective formal system of controls to ensure that drums only from approved lots can be made available for shipment."

In addition to addressing Action 7, the following corrective actions are being taken to address the condition identified by CBFO CAR 04-032.

5. BNFL Inc. is evaluating AMWTP implementing procedures that require change to address this condition adverse to quality and positively define waste stream populations and control the certification of containers against populations that have been subjected to random sample selection. These procedure changes will address the preventive actions to be implemented to resolve this condition adverse to quality as well as the corrective actions taken to resolve the condition adverse to quality identified in CBFO CAR 04-032.
 - a) MP-TRUW-8.11, "Data Reconciliation" will be revised to incorporate procedural controls to verify characterized containers being prepared for Lot reconciliation are identified in approved waste stream populations prior to release for reconciliation.
 - b) MP-TRUW-8.14, "Preparation of Waste Stream Profile Forms" will be revised to incorporate steps to identify the defined waste stream population to ensure control of any containers not bounded by an approved Waste Stream Profile that would require additional sampling to meet the WIPP WAP.
 - c) MP-TRUW-8.25, "RCRA Statistical Sampling" will be revised to incorporate procedural steps for defining waste stream populations and subsequent Lots into approved sampling plans.

ACTION 5 COMPLETION DATE: August 18, 2004