



United States Government

Department of Energy

memorandum

Carlsbad Field Office
Carlsbad, New Mexico 88221

DATE: August 30, 2004
REPLY TO
ATTN OF: CBFO:QA:MPN:GS:04-1809:UFC 2300.00
SUBJECT: Rejection of Corrective Action Plan for Corrective Action Report 04-033
TO: Jeff Snook, DOE-ID



The Carlsbad Field Office (CBFO) performed verification of corrective action completion for CBFO Corrective Action Report 04-033. The corrective actions taken and implemented for CAR 04-033 have been evaluated by review of documents received from BNFL Inc. The results of the evaluation are documented on the attached CAR continuation sheet, and indicate that AMWTP has not adequately addressed all of the issues identified in the root cause analysis report.

The Root Cause Analysis does not present an adequate evaluation of the contributing factors and lack of barriers that resulted in the Condition Adverse to Quality identified in CBFO CAR 04-033.

The other documents reviewed were found adequate. This CAR is not recommended for closure pending correction of the inadequacies identified in the root cause analysis and verification of data input to WWIS. Please revise and resubmit the root cause analysis as appropriate by September 9, 2004.

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

Martin P. Navarrete
Quality Assurance Specialist

Attachment

040853



Jeff Snook

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August 30, 2004

cc: w/attachments

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CBFO QA File

WIPP Operating Record, MS 486-06

CBFO CORRECTIVE ACTION REPORT

(continuation sheet)

1. CAR No.: 04-033

2. Activity No.: N/A

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Block # 18 Verification of Corrective Action Completion:

The following closure documents submitted by BNFL have been reviewed:

- ABS Consulting Investigation Report number 357R-04 "Investigation of Inconsistencies Identified in the AMWTP Container Populations for WSP-216 and WSP-218", dated 8/12/2004
- BNFL-5232-RPT-TRUW-19, Revision 2, "Population Determination for Waste Stream Profiles BNINW216 and BNINW218"
- BNFL-5232-RPT-TRUW-21, Revision 0, "Evaluation of Characterization Data Associated with 74 AMWTP Containers of Rocky Flats First/Second Stage Sludge Waste"
- BNFL-5232-RPT-TRUW-22, Revision 0, "Evaluation of Characterization Data Associated with 29 AMWTP Containers of Rocky Flats Building 374 Sludge Waste"
- Engineering Design File 909, Revision 3, "Transuranic Waste Sampling Plan for the Idaho National Engineering and Environmental Laboratory"
- INEEL/EXT-01-00015, Revision 2, "Hazardous Waste Code Determination for First/Second Stage Sludge Waste Stream (IDCs 001, 002, 800)"
- INEEL-EXT-01-00517, Revision 0, "Characterization of Rocky Flats Plan Building 374 Sludge Waste Stream (IDCs 007, 803, and 807)"
- MP-TRUW-8.5, Revision 9a, "TRU Waste Certification"
- MP-TRUW-8.11, Revision 7, "Data Reconciliation"
- MP-TRUW-8.14, Revision 3, "Preparation of Waste Stream Profile Forms"
- MP-TRUW-8.16, Revision 8, "WWIS Data Transfer"
- MP-TRUW-8.25, Revision 7, "RCRA Statistical Sampling"
- AMWTP Form-1196, Revision 3, "Randomly Selected Container Report"

The Root Cause Analysis does not present an adequate evaluation of the contributing factors and lack of barriers that resulted in the Condition Adverse to Quality identified in CBFO CAR 04-033. Accordingly, it is not possible to determine whether the recommendations detailed in the report will correct and prevent recurrence of the CAQ. Areas of the report that should be improved are discussed as follows:

1. Causal Factors: Paragraph 1.3 purports to identify two causal factors. The first factor is not a causal factor. It is a restatement of a portion of the CAQ with no description of underlying causes of that condition. After reading the remainder of the report, causal factor 2 appears to be a contributing factor with further underlying causes that may have allowed the CAQ to occur.
2. Description of the Incident:
 - a. Section 4 provides an historical time line of the activities that resulted in the CAQ. It appears that initial indicators of a potential problem were identified by an outside agency through an Observer Inquiry in November 2003; but AMWTP was not brought into the evaluation and resolution of that Inquiry. This appears to have been a point in time when the CAQ could have been prevented had the Inquiry been handled in a different manner, however, there are no recommendations to CBFO in the root cause analysis regarding alternative methods of handling such inquiries in the future.
 - b. Section 4 does not mention the status of AMWTP shipment IN040029 received at WIPP on

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2. Activity No.: N/A

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7/13/2004 and shipment IN040030 which was stopped in transit on 7/14/2004 and returned to AMWTF.

3. Closure of previously issued CBFO CAR 04-032 has been linked to satisfactory resolution and closure of CBFO CAR 04-033. CAR 04-032 was issued in June 2004 to document and resolve what was then considered to be a single incidence of shipment of a container that did not, at first, appear to be part of the approved lot list. Also not mentioned is the issuance of BNFL CAR-6950 dated 6/23/2004 regarding the same situation. Although BNFL performed a root cause analysis for CBFO CAR 04-032, the results of that analysis have not been examined in light of the results of this analysis. The root cause analysis for both CARs must be compared and contrasted.
4. Broken and non-existent barrier analysis was not included in the text of this report although several potential barriers are identified in the Causal Factor Chart in Figure C.1

The other documents in the closure package are found adequate. This CAR is not recommended for closure pending correction of the inadequacies identified in the root cause analysis.

Review performed by:

Anna Holland 8/30/04

Martin Navette 8-30-04