



United States Government

Department of Energy

# memorandum

Carlsbad Field Office  
Carlsbad, New Mexico 88221

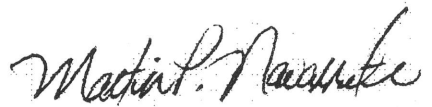
DATE: September 13, 2004  
REPLY TO  
ATTN OF: CBFO:QA:MPN:GS:04-1812:UFC 2300.00  
SUBJECT: Closure of CARs 04-032 and 04-033  
TO: Jeff Snook, DOE-ID



The Carlsbad Field Office (CBFO) performed Verification of Corrective Action Completion for Corrective Action Reports (CARs) 04-032 and 04-033. The corrective actions taken and implemented for these CARs have been evaluated by review of documents received from BNFL Inc in letters *CBFO Accelerated Corrective Action Report 04-033 Revision 1, Closure Package Submittal – ED-027-2004* and *Advanced Mixed Waste Treatment Project Investigation and Root Cause Analysis AMWTP-RCA-04-007 for Closure of CBFO CAR 04-033 Revision 1 – ED-028-2004*. The results of the evaluation indicate that Advanced Mixed Waste Treatment Program (AMWTP) has adequately addressed the issues identified in CARs 04-032 and 04-033 and has adequately implemented the corrective actions to close these CARs.

CARs 04-032 and 04-033 have been closed based on CBFO's verification of the corrective actions. The CAR Continuation Sheet documenting the verification of the corrective action completion and closure of the CARs is attached.

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

  
Martin P. Navarrete  
Quality Assurance Specialist

Attachment(s)

040920



Jeff Snook

-2-

September 13, 2004

cc w/attachments:

A. Holland, CBFO	*ED
K. Watson, CBFO	*ED
R. McCallister, CBFO	*ED
J. Wells, DOE-ID	*ED
M. Eagle, EPA	*ED
E. Feltcorn, EPA	*ED
R. Joglekar, EPA	*ED
S. Zappe, NMED	*ED
S. Holmes, NMED	*ED
E. Schweinsberg, BNFL	*ED
E. Dumas, BNFL	*ED
A. Dobson, BNFL	*ED
D. Winters, DNFSB	*ED
A. Pangle, CTAC	*ED
J. May, CTAC	*ED
L. Greene, WRES	*ED
WIPP Operating Record, MS 486-06	
CBFO QA File	
CBFO M&RC	

# CBFO CORRECTIVE ACTION REPORT

(Continuation Sheet)

1. CAR No. 04-032 and 04-033

2. Activity Report No. N/A

3. Page 1 Of 2

## Block # 18, Verification of Corrective Action Completion

CBFO reviewed the completion of corrective actions for CARs 04-032 and 04-033 Rev 1 and the revision of the AMWTP Corrective Action Response to incorporate the results from the Investigative and Root Cause Actions taken in response to CBFO CAR 04-033 Revision 1, based on the BNFL letter, "CBFO Accelerated Corrective action Report 04-033 Revision 1, Closure Package submittal - ED-027-2004" to Martin Navarrete, CBFO from Elvin Dumas, BNFL, dated August 19, 2004. In addition, CBFO reviewed the Advanced Mixed Waste Treatment Project Investigation and Root Cause Analysis AMWTP-RCA-04-007 for Closure of CBFO CAR 04-033 Revision 1 - ED-028-2004 to Martin Navarrete, CBFO from Elvin Dumas, BNFL, dated September 1, 2004.

The above submittals address the investigative actions and root cause analysis, completion of remedial actions, completion of preventive actions, and objective evidence to support closure of the conditions adverse to quality identified in CBFO Corrective Action Reports (CARs) 04-032 and 04-033, Revision 1. Each of the conditions adverse to quality, actions taken for each condition and objective evidence to support these actions were evaluated during closure verification activities as follows:

### Conditions Adverse to Quality

#### CAR 04-032

AMWTP performed verification and approval for shipment IN040006, TDOP BN10008782 which contained container number BN10002892 (Waste stream BNINW216) and authorized shipment on 3/22/04. Container number BN10002892 was not authorized to be shipped to WIPP since it was not listed in Attachment 4, *AMWTP Container ID List (BNINW216) - Lot 1*, of the CBFO letter CBFO:NTP:KWW:VW:04-1061, dated March 9, 2004, granting authority for certification and characterization of contact handled homogenous solids.

Upon performing a query of approved containers in the WWIS it was discovered that container number BN10002892 was not on the final list submitted to CBFO and attached to the certification letter. WTS contacted AMWTP and it was verified that container number BN10002892 had been shipped. WTS then notified AMWTP that container number BN10002892 was not on the AMWTP Container ID List - Lot 1. AMWTP responded notifying WTS that the container was sent to WIPP in shipment IN040006 in TDOP BN10008782.

Container number BN10002892 has been fully characterized by AMWTP and has been found to be acceptable for disposal at WIPP. Historically this container was identified as IDRF741202316 and was among the containers that were in Type II storage modules during the 3100 m<sup>3</sup> project for which the inventory was designated as Lot 1. This is demonstrated by the AMWTP AK Source Document Review Summary, Reference U122A, references a Container Inventory Report for WMF-629 thru WMF-633 which identifies the containers remaining in accessible storage (Type-II modules) following completion of the 3100 m<sup>3</sup> project. Container Number IDRF741202316 is listed on page 6 of 270 of the report. The container was inadvertently omitted from the list of Lot 1 authorized containers by AMWTP.

#### CAR 04-033

AMWTP incorrectly identified containers as part of the BNINW216 lot 1 population that should have been excluded.

AMWTP failed to recognize that some containers from the remaining BNINW218 waste population were excluded from the INEEL 3,100 m<sup>3</sup> Project population of randomly sorted containers.

Verified through review of the following listed documents, which make up the submitted closure package, that the Suggested Actions listed in Block No. 10 have been performed in an acceptable manner and that the investigative and root cause has been adequately determined.

# CBFO CORRECTIVE ACTION REPORT

(Continuation Sheet)

1. CAR No. 04-032 and 04-033

2. Activity Report No. N/A

3. Page 2 Of 2

Block 10, Items 1, 2, 3, and 5:

BNFL-5232-RPT-TRUW-19, revision 2 "Population Determination for Waste Stream Profiles BNINW216 and BNINW218." This report contains data from the 3100 M<sup>3</sup> project that has been validated as the original waste stream lot containers from the above ground inventory of 216 and 218 waste streams that were subjected to solids sampling selection. The list of containers was validated from the container lists derived from the TRIPS report and is documented as Attachments 1 and 2 of BNFL-5232-RPT-TRUW-19.

BNFL-5232-RPT-TRUW-21 R/O, "Evaluation of Characterization Data Associated with 74 AMWTP Containers of Rocky Flats First/Second Stage Sludge Waste"

BNFL-5232-RPT-TRUW-22 R/O, "Evaluation of Characterization Data Associated with 29 AMWTP Containers of Rocky Flats Building 374 Sludge Waste."

Block 10, Items 6:

Engineering Design File (EDF) 909 Revision 3  
INEEL/EXT-01-00015, Revision 2  
INEEL/EXT-01-00517, Revision 0

Block 10, Items 4 and 7:

MP-TRUW-8.11, Revision 7, "Data Reconciliation"  
MP-TRUW-8.14, Revision 3, "Preparation of Waste Stream Profile Forms"  
MP-TRUW-8.25, Revision 7, "RCRA Statistical Sampling"  
AMWTP Form-1196, Revision 3, "Randomly Selected container Report"

Investigative and Root Cause:

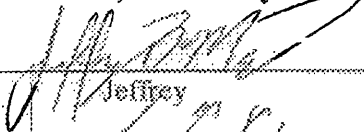
ABS Consulting Investigation Report 357R-04, "Investigation of Inconsistencies Identified in the AMWTP Container Populations for WSP-216 and WSP-218"

AMWTP Investigative and Root Cause Analysis Report AMWTP-RCA-04-007

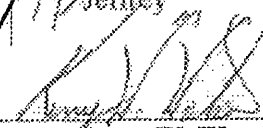
It was also verified that the procedural requirements have been established for a formal system of controls to ensure that drums only from approved lots can be made available for shipment and that AMWTP 's data input to WWIS has been acceptable since the partial lift of work suspension associated with CAR 04-033, Revision 1 was issued on August 20, 2004 by CBFO letter CBFO:QA:ALH:VW:04-1596:UFC:2300, R. Paul Detwiler to Brian Edgerton, DOE-ID.

Based upon the above, it is recommended that CARs 04-032 and 04-033, Revision 1 be closed.

Block # 19a, Verified by:

  
Jeffrey

Date: 9/13/04

  
Kerry W. Watson

Date: 9/13/04

Block #19b, Trend Cause Code: 3.2, Inattention to detail  
6.1, Inadequate administrative control  
6.3, Inadequate supervision