



**Department of Energy**

Carlsbad Field Office  
P. O. Box 3090  
Carlsbad, New Mexico 88221

November 24, 2004



Mr. Steve Zappe, Project Leader  
Hazardous Waste Bureau  
New Mexico Environment Department  
2905 Rodeo Park Drive East, Building 1  
Santa Fe, New Mexico 87505-6303

**Subject:** Transmittal of Requested Information on the Extension of the Corrective Action Completion Due Date for CBFO Corrective Action Report 05-003

Dear Mr. Zappe:

This letter transmits the response to your concerns expressed in an e-mail to the Carlsbad Field Office (CBFO) on November 16, 2004, regarding CBFO approval of the extension of the due date for CBFO Corrective Action Report (CAR) 05-003.

Enclosed are the following documents:

- CBFO letter CBFO:QA:DSM:LC:04-1849:UFC:2300.00, Dennis Miehl to Tim Hedahl, dated October 19, 2004, Re: Issuance of Corrective Action Reports 05-001 through 05-004 from Audit A-05-02 of the NTS/CCP.
- CBFO letter CBFO:DSM:LC:04-1864:UFC:2300.00, Dennis Miehl to Tim Hedahl, dated October 26, 2004, Subject: Advance Notice of CARs 05-003 and 05-004 Due Dates for Corrective Action Plan Submittals.
- Washington TRU Solutions (WTS) letter CP:04-01502, Tim Hedahl to Dennis Miehl, dated November 1, 2004, Subject: Corrective Action Plans for Corrective Action Reports 05-003 and 05-004.
- CBFO letter CBFO:QA:DSM:LC:04-1871:UFC:2300, Dennis Miehl to Tim Hedahl, dated November 3, 2004, Subject: Evaluation of the Proposed Corrective Actions for CARs 05-003 and 05-004.
- CBFO letter CBFO:QA:DSM:LC:04-1872:UFC:2300.00, Dennis Miehl to Tim Hedahl, dated November 8, 2004, Subject: Advance Notice of Accelerated CARs 05-003 and 05-004 Due Dates for Corrective Action Completion.
- WTS letter CP:04:01535, Tim Hedahl to Dennis Miehl, dated November 11, 2004, Subject: Request for Extension on Corrective Action Report 05-003.
- CBFO letter CBFO:QA:DSM:LC:04-1885, Lloyd Piper to Tim Hedahl, dated November 16, 2004, Subject: Request for Extension on Accelerated Corrective Action Report 05-003.

The Central Characterization Program (CCP) has completed the review of all tapes generated in support of Visual Examination (VE) at the NTS since the completion of the first campaign (December 2002).



A listing of the affected tapes and associated containers are enclosed. A recap of the results to date is as follows:

53 VE tapes have been reviewed:

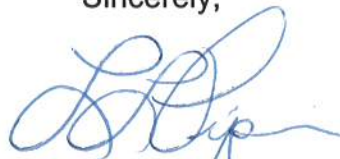
- All of the reviews concluded that the video portion of the tapes were clear and acceptable.
- 23 of the 53 tapes have audio problems with some portion of the tape.
- The audio check was performed appropriately at the beginning of each tape.
- The audio problems are due to an equipment malfunction, which has been corrected.
- Of the 23 tapes identified with audio problems, 53 drums were impacted.
- Of the 53 drums impacted, 8 have been received and disposed at the WIPP.
- None of the drums scheduled for the two shipments on November 18, 2004 are affected by this issue.

The dubbing of the tapes, needed to recover the audio portion of the record, will be performed by a qualified Visual Examination Expert (VEE). The dubbing equipment and the process format have been established, and personnel have been assigned. This process began on 11/18/04. The dubbing of the tapes will take approximately 6 - 8 hours per tape. The VEE will note on the recovered tapes that the tapes are being dubbed in accordance with Corrective Action Report 05-003.

CCP procedure CCP-TP-062, the visual examination procedure, is in the final approval stages to incorporate verification by the Independent Technical Reviewer of the individual drums per tape for both audio and video. This is intended to eliminate similar deficiencies in future tapes.

If you have any questions or comments, please contact Ms. Ava L. Holland at (505) 234-7423.

Sincerely,



Lloyd L. Piper  
Acting Manager

Enclosures

Mr. Steve Zappe

-3-

November 24, 2004

cc: w/enclosures \*ED  
K. Watson, CBFO \*ED  
A. Holland, CBFO \*ED  
D. Miehl, CBFO \*ED  
D. Haar, WTS \*ED  
A. Fisher, WTS \*ED  
L. Greene, WRES \*ED  
A. Pangle, CTAC \*ED  
C. Riggs, CTAC \*ED

cc: w/o enclosures  
J. Norton, DOE-NSO \*ED  
M. Eagle, EPA \*ED  
B. Shroff, EPA \*ED  
R. Joglekar, EPA \*ED  
E. Feltcorn, EPA \*ED  
J. Kieling, NMED \*ED  
J. Bearzi, NMED \*ED  
S. Holmes, NMED \*ED  
D. Winters, DNFSB \*ED  
S. Warren, WTS \*ED  
WIPP Operating Record  
CBFO QA Record File  
CBFO M&RC

\*ED denotes electronic distribution

NTS / CCP A-05-02

CAR 05-003



Department of Energy  
Carlsbad Field Office  
P. O. Box 3090  
Carlsbad, New Mexico 88221

October 19, 2004

Tim Hedahl  
Washington TRU Solutions  
P.O. Box 2078  
Carlsbad, NM 88331-2078

Re: Issuance of Corrective Action Reports 05-001 through 05-004 from Audit  
A-05-02 of the NTS/CCP

Dear Mr. Hedahl:

The Carlsbad Field Office (CBFO) performed Audit A-05-02 of the Nevada Test Site (NTS) Central Characterization Project (CCP) characterization activities on October 05-08, 2004. CBFO Corrective Action Reports (CARs) 05-001 through 05-004 are enclosed.

Please document on the attached CAR continuation sheets your proposed corrective actions and a schedule for completion then forward to me prior to the response due date identified in CAR block 14. CARs 05-003 and 05-004 require accelerated corrective action.

Attached are the instructions for providing corrective action responses for your use in preparing the required responses.

If you have any questions or comments, contact me at (505) 234 -7491.

Sincerely,

A handwritten signature in cursive script, appearing to read "D. S. Miehl".

Dennis S. Miehl  
Quality Assurance Specialist

Enclosures

**COPY**

cc w/enclosures:

A. Holland, CBFO \*ED  
K. Watson, CBFO \*ED  
R. McCallister, CBFO \*ED  
J. Norton, NSO \*ED  
M. Eagle, EPA \*ED  
B. Shroff, EPA \*ED  
E. Feltcorn, EPA \*ED  
R. Joglekar, EPA \*ED  
S. Zappe, NMED \*ED  
D. Winters, DNFSB \*ED  
L. Greene, WRES \*ED  
D. Haar, WTS \*ED  
A. Fisher, WTS \*ED  
C. Riggs, CTAC \*ED  
A. Pangle, CTAC \*ED  
WIPP Operating Record, MS 486-06  
CBFO QA File  
CBFO M&RC



Department of Energy  
Carlsbad Field Office  
P. O. Box 3090  
Carlsbad, New Mexico 88221  
October 26, 2004

Mr. Tim Hedahl  
Washington TRU Solutions  
P.O. Box 2078  
Carlsbad, NM 88221-2078

Subject: Advance Notice of CARs 05-003 and 05-004 Due Dates for Corrective Action Plan Submittals

Dear Mr. Hedahl:

Corrective Action Reports (CARs) 05-003 and 05-004, identified within the *Nevada Test Site/Central Characterization Project (NTS/CCP)* organization, are classified as accelerated action CARs and are due to have corrective action plans (including schedules for completion) submitted by November 1, 2004.

This memorandum is advance notification that time is growing short for completion of actions regarding these CARs. Time frames are based on dates determined at the time of issuance of the CARs and dates submitted in site correspondence. The original response due dates are determined at the time of issuance of the CARs. Subsequent response due dates and corrective action completion dates are determined by CBFO approval of information submitted in corrective action plans and CAR closure packages.

Please review the progress of actions regarding these CARs and determine if the dates are realistic regarding expected completion. No action is necessary if dates are determined to be adequate for completion of actions. However, if the review indicates that additional time is needed, please submit an extension request including revised completion dates and any relevant justification for the request(s).

If you have any questions or require additional information concerning CAR action due dates, please contact me at (505) 234-7491.

Sincerely,

A handwritten signature in cursive script, appearing to read "Dennis S. Miehl".

Dennis S. Miehl  
Quality Assurance Specialist

cc:

A. Holland, CBFO	*ED
K. Watson, CBFO	*ED
R. McCallister, CBFO	*ED
J. Norton, NSO	*ED
D. Haar, WTS	*ED
A. Fisher, WTS	*ED
C. Riggs, CT AC	*ED
W. Ledford, CTAC	*ED
P. Rodriguez, CTAC	*ED
B. Verret, CTAC	*ED
A. Axinn, CTAC	*ED
A. Pangle, CT AC	*ED
CBFO QA File	
CBFO M&RC	



COPY



**Washington**  
TRU Solutions LLC

CP:04:01502  
UFC:2300.00

November 1, 2004

Mr. D. S. Miehl  
Quality Assurance Specialist  
Carlsbad Field Office  
U.S. Department of Energy  
P.O. Box 3090  
Carlsbad, NM 88221-3090

Subject: CORRECTIVE ACTION PLANS FOR CORRECTIVE ACTION REPORTS  
05-003 AND 05-004

Reference: DOE Letter CBFO:QA:DSM:LC:04-1849:UFC 2300 (DW:04:01130) from  
Mr. D. S. Miehl to Mr. T. Hedahl, dated October 19, 2004, subject: Issuance of  
Corrective Action Reports 05-001 through 05-004 from Audit A-05-02 of the NTS/CCP

Dear Mr. Miehl:

The Corrective Action Plans (CAPs) for Corrective Action Reports (CARs) 05-003 and 05-004 are being submitted for your review and approval. These CARs were identified under CBFO Audit A-05-02 of the WTS Central Characterization Project (CCP) at the Nevada Test Site (NTS) performed on October 5-8, 2004.

If you have any questions or comments, please contact me at (505) 234-7260.

Sincerely,

T. G. Hedahl, Manager  
National TRU Program

JRF:lu

Attachments

cc: (with attachments)  
A. Colarusso, NTS/NNSA  
A. Holland, CBFO  
K. W. Watson, CBFO

UNIQUE #	DOE UFC	DATE REC'D	ADDRESSEES
0405007	2300-00	NOV 01 2004	D. Miehl A. Holland K. Watson B. Pangic

Corrective Action Plan  
For  
Corrective Action Report: 05-003

**A. Corrective Action Plan**

CAR 05-003 identified one (1) condition adverse to quality relating to implementation of CCP-PO-001, Section B1-3b(3). Following are the elements of the Central Characterization Project (CCP) Corrective Action Plan developed in response to Corrective Action Report (CAR) 05-0030. CCP has addressed Remedial Actions, Investigative Actions, Root Cause, and Actions to Preclude Recurrence, in accordance with direction of this CAR.

***Condition Adverse to Quality:***

*There is no audio on the video/audio tape for the container loading and bagout for Visual Examination (VE) in lieu of Real-time Radiography (RTR) batch NT-VE-0042. There is audio for the audio/video check.*

**1. Remedial Action(s) Taken:**

**Actions:**

Review of the audio portion of all VE batch video tapes is currently in progress.

**2. Investigative Actions**

**2a. Extent:**

The extent of loss of audio is specific to the Nevada Test Site (NTS) VE process.

**2b. Impact:**

The review of all Batch Data Report video tapes from VE at the NTS will be conducted. The identification of no audio on the reviewed tapes will be documented via a Nonconformance Report (NCR). The correction of the audio will be completed by a VE Expert and documented in the NCR. Identification will be made on the video tape that audio was transposed on the tape with the reason and the date and time of transposition.

**3. Root Cause of the Problem:**

The root cause was attributed to personnel error. The test required to verify audio was conducted properly and passed but when the recording of the activity commenced the audio was not placed back in service.

Corrective Action Plan  
For  
Corrective Action Report: 05-003

**4. Actions to Preclude Recurrence:**

The action to prevent recurrence is the procedure will be updated to include verification of the audio of the video tape prior to transmitting to the project office. This will require a revision to CCP-TP-062, TRU Waste Visual Examination, Segregation, and Repacking. The revision will incorporate an audio verification by the Independent Technical Reviewer.


**Responsible Individual:** Ingrid Siddoway

**Responsible CCP Manager:** Joe Franco

**Anticipated Completion Date:** 11/15/04

**Corrective Action Plan Approval:**

Dave Haar  
CCP Manager

  
Signature

11/1/04  
Date

Corrective Action Plan  
For  
Corrective Action Report: 05-003

**B. Corrective Action Completed**

**Letter Number Providing Statement of Completion (if used):** \_\_\_\_\_

**Corrective Action Completion Verified by (as assigned by the CCP Manager):**

Name	Signature	Date
------	-----------	------

The above signature certifies/validates the contents of this document as authentic and complete.

**Methods of Verification:**

\_\_\_\_\_ Record Reviews

\_\_\_\_\_ Personnel Interviews (list the names and position titles of those interviewed in the comment section).

\_\_\_\_\_ Field Observation (list performance/activities observed in the comment section).

**Verification Comments (use continuation pages if needed).**

Corrective Action Plan  
For  
Corrective Action Report: 05-003

**CONTINUATION PAGE:**



Department of Energy  
Carlsbad Field Office  
P. O. Box 3090  
Carlsbad, New Mexico 88221

November 3, 2004

Tim Hedahl  
Washington TRU Solutions  
P.O. Box 2078  
Carlsbad, NM 88331-2078

Subject: Evaluation of the Proposed Corrective Actions for CARs 05-003 and 05-004

Dear Mr. Hedahl:

Attached are the results of CBFO's review of the proposed Corrective Action Plans (CAPs) for CARs 05-003 and 05-004. The proposed corrective actions are acceptable. The results of the evaluation indicate that CCP has adequately addressed the issues identified in the CARs. The results of the evaluations are documented on the attached CAR Continuation Sheets.

If you have any questions or comments, please contact me at (505) 234 -7491.

Sincerely,

Dennis S. Miehl  
Quality Assurance Specialist

Enclosures

cc w/enclosures:

A. Holland, CBFO	*ED
K. Watson, CBFO	*ED
J. Norton, NSO	*ED
M. Eagle, EPA	*ED
B. Shroff, EPA	*ED
E. Feltcorn, EPA	*ED
R. Joglekar, EPA	*ED
S. Zappe, NMED	*ED
D. Winters, DNFSB	*ED
L. Greene, WRES	*ED
D. Haar, WTS	*ED
C. Riggs, CTAC	*ED
A. Pangle, CTAC	*ED
WIPP Operating Record, MS 486-06	
CBFO QA File	

FO CORRECTIVE ACTION REPORT

(Continuation Sheet)

1. CAR No. 05-003

2. Activity Report No. A-05-02

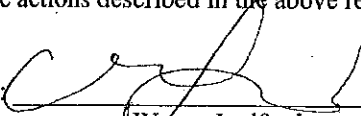
3. Page \_\_\_\_\_ Of \_\_\_\_\_

**Block 17 Evaluation of Proposed Corrective Actions**

The following is an evaluation of the response as submitted by the Washington TRU Solutions LLC Central Characterization Project (CCP) in a letter T. G. Hedahl to D. S. Miehl dated November 1, 2004:

The corrective actions described in the above response are acceptable.

Evaluated By:

  
Wayne Ledford

Date:

11/1/04



Department of Energy  
Carlsbad Field Office  
P. O. Box 3090  
Carlsbad, New Mexico 88221

November 8, 2004

Mr. Tim Hedahl  
Washington TRU Solutions  
P.O. Box 2078  
Carlsbad, NM 88221-2078

Subject: Advance Notice of Accelerated CARs 05-003 and 05-004 Due Dates for  
Corrective Action Completion

Dear Mr. Hedahl:

Corrective Action Reports (CARs) 05-003 and 05-004, identified within the *Nevada Test Site/Central Characterization Project (NTS/CCP)* organization, are classified as accelerated action CARs and are required to have all corrective actions complete by November 17, 2004. The expected corrective action completion due date for these two CARs is November 15, 2004, as reflected by the Corrective Action Plans submitted to the Carlsbad Field Office (CBFO) by NTS/CCP via letter dated November 1, 2004 (CP:04:01502).

This memorandum is advance notification that time is growing short for completion of actions regarding these CARs. Time frames are based on dates determined at the time of issuance of the CARs and dates submitted in site correspondence. The original response due dates are determined at the time of issuance of the CARs. Subsequent response due dates and corrective action completion dates are determined by CBFO approval of information submitted in corrective action plans and CAR closure packages.

Please review the progress of actions regarding these CARs and determine if the dates are realistic regarding expected completion. No action is necessary if dates are determined to be adequate for completion of actions. However, if the review indicates that additional time is needed, please submit an extension request including revised completion dates and any relevant justification for the request(s).

If you have any questions or require additional information concerning CAR action due dates, please contact me at (505) 234-7491.

Sincerely,

A handwritten signature in black ink that reads "Dennis S. Miehl".

Dennis S. Miehl  
Quality Assurance Specialist



cc:

A. Holland, CBFO	*ED
K. Watson, CBFO	*ED
R. McCallister, CBFO	*ED
J. Norton, NSO	*ED
D. Haar, WTS	*ED
A. Fisher, WTS	*ED
C. Riggs, CT AC	*ED
W. Ledford, CTAC	*ED
P. Rodriguez, CTAC	*ED
B. Verret, CTAC	*ED
A. Axinn, CTAC	*ED
A. Pangle, CTAC	*ED
CBFO QA File	
CBFO M&RC	

COPY



CP:04:01535  
UFC:2300.00

November 11, 2004

Mr. D. S. Miehl  
Quality Assurance Specialist  
Carlsbad Field Office  
U.S. Department of Energy  
P.O. Box 3090  
Carlsbad, NM 88221-3090

Subject: REQUEST FOR EXTENSION ON CORRECTIVE ACTION REPORT 05-003

Dear Mr. Miehl:

I am hereby requesting an extension until January 17, 2005 for completion of the corrective actions associated with Corrective Action Report (CAR) 05-003. This CAR was issued as part of the Central Characterization Project (CCP) Certification Audit at the Nevada Test Site, and concerns the video tapes for the Visual Examination process. The initial investigation from the corrective actions identified audio problems with 22 of 49 video tapes. The corrective action to restore audio for each identified problem will take longer than originally indicated on the Corrective Action Plan. The corrective action will require a qualified Visual Examination Expert to complete the audio portion of the identified video tapes.

Thank you for your time and attention in this matter. If you have any questions, please contact Mr. D. H. Haar at (505) 234-7446.

Sincerely,

T. G. Hedahl, Manager  
National TRU Program

JF:lu

cc: A. Holland, CBFO  
C. Riggs, CTAC  
I. Siddoway, Bechtel Nevada

UNIQUE #	DOE UFC	DATE REC'VD	ADDRESSEES
04061980300000		NOV 11 2004	D. Miehl A. Holland A. Pangle



Department of Energy  
Carlsbad Field Office  
P. O. Box 3090  
Carlsbad, New Mexico 88221  
November 16, 2004

Tim Hedahl, Manager  
National TRU Program  
Washington TRU Solutions  
P.O. Box 2078  
Carlsbad, NM 88221-2078

Subject: REQUEST FOR EXTENSION ON ACCELERATED CORRECTIVE ACTION REPORT 05-003

Dear Mr. Hedahl:

The Carlsbad Field Office has evaluated your request for an extension of the corrective action completion date associated with Corrective Action Report (CAR) 05-003. Based on the fact that your initial investigation identified audio problems with 22 video tapes, in addition to the timeframe needed to restore audio for each identified problem, your extension request is granted. The new due date for completion of all corrective actions associated with CAR 05-003 is January 17, 2005.

If you have any questions or comments, please contact Ava Holland at (505)234-7423.

Sincerely,

Lloyd L. Piper  
Acting Manager

cc:

A. Holland, CBFO	*ED
D. Miehl, CBFO	*ED
K. Watson, CBFO	*ED
J. Norton, NSO	*ED
M. Eagle, EPA	*ED
B. Shroff, EPA	*ED
R. Joglekar, EPA	*ED
E. Feltcorn, EPA	*ED
S. Zappe, NMED	*ED
D. Winters, DNFSB	*ED
L. Greene, WRES	*ED
D. Haar, WTS	*ED
A. Fisher, WTS	*ED
C Riggs, CTAC	*ED
A Pangle, CTAC	*ED
WIPP Operating Record, MS 486-06	
CBFO QA File	

Attachment 2

Nevada Test Site: VE Tapes with Audio Problems

TAPE Number	Drum Number	Drums affected with audio problems	Drums in underground
244	NT031173		
	NT031174		
	NT031175	X	X
	NT031176		
	NT031177		
	NT031178	X	
	NT031179		
	NT031180		
250	NT031181		
	NT031206		
	NT031207	X	
	NT031208		
	NT031209		
255	NT031221	X	X
	NT031222		
	NT031223		
	NT031224		
	NT031225		
	NT031226		
260	NT041251		
	NT041252		
	NT041253		
	NT041254		
	NT041255	X	
261	NT041256	X	X
	NT041257	X	
	NT041258		
	NT041259	X	
	NT041260	X	
262	NT041261		
	NT041262		
	NT041263	X	
	NT041264	X	X
263	NT041265	X	
	NT041266		

Nevada Test Site: VE Tapes with Audio Problems

TAPE Number	Drum Number	Drums affected with audio problems	Drums in underground
263 cont.	NT041267		
	NT041268		
264	NT041269	X	
	NT041270		
	NT041271		
	NT041272		
265	NT041273		
	NT041274	X	
	NT041275		
	NT041276		
	NT041277		
	NT041278	X	
	NT041279	X	
266	NT041280		
	NT041281		
	NT041282		
	NT041283	X	
	NT041284		
	NT041285	X	
267	NT041286		
	NT041287	X	
	NT041288	X	
	NT041289	X	
272	NT041301		
	NT041302	X	
	NT041303		
	NT041304		
273	NT041320	X	
	NT041326	X	
274	NT041327	X	
	NT041328	X	
	NT041329		
	NT041330	X	
	NT041331	X	

Nevada Test Site: VE Tapes with Audio Problems

TAPE Number	Drum Number	Drums affected with audio problems	Drums in underground
274 cont.	NT041332		
	NT041333		
	NT041299	X	
275	NT041334	X	
	NT041335	X	
	NT041325		
	NT041336		
278	NT041431	X	
	NT041432		
	NT041433		
	NT041434		
	NT041435		
	NT041436		
279	NT041437		
	NT041469		
	NT041470		
	NT041471		
	NT041472	X	X
	NT041473		
	NT041474	X	X
	NT041475		
NT041476	X		
281	NT041406	X	
	NT041407	X	
	NT041408	X	
	NT041409		
	NT041480	X	X
	NT041410		
	NT041411	X	
	NT041412	X	X
282	NT041413	X	
	NT041414	X	
	NT041481	X	
	NT041461		
	NT041482		
	NT041483		

Nevada Test Site: VE Tapes with Audio Problems

TAPE Number	Drum Number	Drums affected with audio problems	Drums in underground
282 cont.	NT041484	X	
284	NT041518		
	NT041519		
	NT041549		
	NT041550		
	NT041551	X	
	NT041404	X	
	NT041553	X	
285	NT041559		
	NT041345		
	NT041560		
	NT041343		
	NT041561	X	
	NT041468		
286	NT041563	X	
	NT041399		
	NT041466	X	
	NT041569	X	
287	NT041322		
	NT041669	X	
	NT041598		
	NT041628		