



United States Government

Department of Energy

memorandum

Carlsbad Field Office
Carlsbad, New Mexico 88221

DATE: January 3, 2005
 REPLY TO
 ATTN OF: CBFO:QA:DSM:LC:05-0300:UFC:2300
 SUBJECT: Issuance of Corrective Action Report Initiated During Surveillance S-05-03
 TO: Joe Legare, Assistant Manager for Projects

The Carlsbad Field Office (CBFO) performed Surveillance S-05-03 of the Rocky Flats Environmental Technology Site (RFETS) on December 20-21, 2004. CBFO Corrective Action Report (CAR) 05-009 is attached.

Please document on the attached CAR continuation sheets your proposed corrective actions and a schedule for completion and forward to me prior to the response due date identified in CAR block 14. This CAR requires accelerated corrective action which must be completed within thirty days of the receipt of this memorandum.

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

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

Dennis S. Miehl
Quality Assurance Specialist



Attachments

cc: w/attachments
 A. Holland, CBFO *ED
 K. Watson, CBFO ED
 C. Ferrera, RFETS ED
 G. O'Leary, RFETS ED
 F. Grady, RFETS ED
 M. Eagle, EPA ED
 R. Joglekar, EPA ED
 E. Feltcorn, EPA ED
 S. Zappe, NMED ED
 S. Holmes, NMED ED
 C. Riggs, CTAC ED
 A. Pangle, CTAC ED
 WIPP Operating Record, MS 486-06
 CBFO QA File
 CBFO M&RC

*ED denotes electronic distribution

050103



CORRECTIVE ACTION REPORT

1. CAR No.: 05-009	2. Activity Report No.: S-05-03	3. Page <u>1</u> of <u>2</u>
4. Controlling Document: PRO-484-WIPP-003		5. CBFO Assessment Team Leader: Dennis Miehl
6. Responsible Organization: RFETS		7. CAQ Was Discussed With: M. Johnson, E D'Amico
8. Requirement that was violated: PRO-484-WIPP-003, Sections 1 and 6.1.1, (see continuation sheet)		
9. Condition Adverse to Quality: Waste stream RF130.01 includes containers that contain sealed sources. The isotopic quantities for these sealed sources were obtained from a RFETS Radiological Engineering database. This database is not referenced in the AK documentation for the waste stream. The information documented for these containers does not constitute an auditable AK record.		
10. Suggested Actions (Optional):		
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>W. Ledford, S. Calvert</u> Date: _____		
14. Response Due Date: <u>1-18-05</u> Corrective Action Plan Required: YES Required Corrective Action Completion Date: <u>2-3-05</u>		
15. a. Concurrence: <u>D. A. Miehl</u> <u>1-3-05</u> b. <u>N/A</u> Assessment Team Leader Date Responsible Assistant Manager Date <u>[Signature]</u> <u>1/3/05</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.: 05-009

2. Activity No.: S-05-03

3. Page 2 of 2

Block # 8

From PRO-484-WIPP-003, Section 1: "This procedure provides instruction for compiling, reviewing, and managing additional AK not specifically addressed by other Site programs or documents... Implementation of this procedure will ensure that a consistent, defensible, and auditable record is created that documents AK for TRU waste inventories and waste streams."

From PRO-484-WIPP-003, Section 6.1.1: Required TRU Waste Stream Information,

- "Material inputs or other information that identifies the chemical content of the waste stream and the physical waste form (e.g., glove box materials and chemicals handled during glove box operations, if applicable).
- Specification of the isotopic ratios for the 10 WIPP-tracked radionuclides (^{241}Am , ^{238}Pu , ^{239}Pu , ^{240}Pu , ^{242}Pu , ^{233}U , ^{234}U , ^{238}U , ^{90}Sr , and ^{137}Cs) and, if applicable, the radionuclides that comprise 95% of the radiological hazard on a waste stream, waste stream subpopulation, or container basis....
- Information regarding the waste's physical and chemical composition that could affect the isotopic distribution, e.g., processes used to remove ingrown ^{241}Am or alter its expected contribution based solely on radioactive decay kinetics.
- Statement of all numerical adjustments applied to derive the material's isotopic distribution, e.g., scaling factors, decay/in-growth corrections and secular equilibrium considerations."

INSTRUCTIONS FOR PROVIDING CORRECTIVE ACTION RESPONSE

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

CAR NO: 05-009
PAGE 1 OF 1

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 # 05-009
 - 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.