

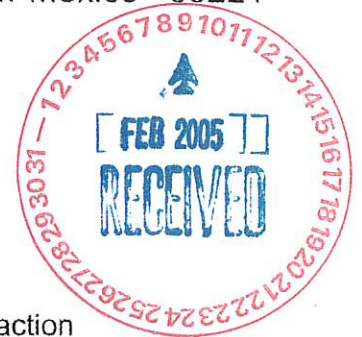
United States Government

Department of Energy

# memorandum

Carlsbad Field Office  
Carlsbad, New Mexico 88221


DATE: February 9, 2005  
REPLY TO  
ATTN OF: CBFO:QA:MPN:LC:05-0347:UFC:2300  
SUBJECT: Closure of CARs 04-038 and 04-039  
TO: Jeff Snook, DOE-ID



The Carlsbad Field Office (CBFO) performed verification of corrective action completion for Corrective Action Reports (CARs) 04-038 and 04-039. The corrective actions taken and implemented for these CARs have been evaluated by review of the objective evidence initially submitted in the CAR closure package transmitted via letter EM-AMWTP-05-009, dated January 19, 2005. This objective evidence was amended for CAR 04-038 via letter EM-AMWTP-05-015, dated January 27, 2005 and updated in Memo ED-004-2005, which was issued 01-26-05. The results of the evaluation indicate that Advanced Mixed Waste Treatment Project (AMWTP) has addressed the issues identified in CARs 04-038 and 04-039 and has implemented the corrective actions for this issue.

CARs 04-038 and 04-039 have been closed based on the CBFO verification of the corrective actions. The CAR Continuation Sheets documenting corrective action completion and closure of the CARs are attached.

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

  
Martin P. Navarrete  
Quality Assurance Specialist

Attachments

050213



Jeff Snook

-2-

February 9, 2005

cc: w/attachments

A. Holland, CBFO \*ED

K. Watson, CBFO ED

J. Wells, DOE-ID ED

M. Eagle, EPA ED

E. Feltcorn, EPA ED

R. Joglekar, EPA ED

S. Zappe, NMED ED

E. Schweinsberg, BNFL ED

E. Dumas, BNFL ED

A. Dobson, BNFL ED

D. Winters, DNFSB ED

A. Pangle, CTAC ED

C. Riggs, CTAC ED

L. Greene, WRES ED

WIPP Operating Record, MS 486-06

CBFO QA File

CBFO M&RC

\*ED denotes electronic distribution

# CBFO CORRECTIVE ACTION REPORT

(continuation sheet)

1. CAR No: 04-038

2. Activity No: CBFO Audit A-04-22

3. Page 1 of 2

## Block # 18 Verification of Corrective Action Completion

The corrective actions taken and implemented for the deficiencies identified within CAR 04-038 were evaluated based on the objective evidence provided by AMWTP in a memorandum from Jeff Snook to Ava L. Holland, dated January 19, 2005.

### Remedial Actions

1. All containers and associated Batch Reports sampled through the HGAS units which was the process where the self tapping sampling port devices were installed, have been identified. The AMWTP Site Project Manager has issued a Management directive to place all Batch Data Reports from the HGAS Units on Administrative Hold pending completion of NCR generation. Management Directive was issued under Letter EPS-076-2004 to all functional TRU Programs Site Project Managers on 10/6/04.

Verified by review of:

- Management directive, Letter No. EPS-076-2004 issued 10/6/04.
- AMWTP BNFL, Inc. CAR 9437, August 25, 2004, issued to identify and place all affected Batch Data Reports on hold until completion of NCR generation.
- Memo ED-004-2005 issued 01-27-05, clarifying and correcting typographical errors in Letter No. EPS-076-2004 and CAR 9437.

2. A Nonconformance report will be issued for each container identified to have processed through the HGAS units to prevent the containers from Lot Reconciliation and WWIS entry. A physical inspection of each container to identify those with an installed self tapping sampling port device will be conducted and documented through the NCR process for each container. Containers verified to have self tapping sample ports installed will require resample using an approved sampling method.

Verified by review of AMWTP CAR 9437 (amended by the 1/27/05 memorandum) that identifies all affected drums and lists their corresponding NCR numbers.

3. Procedure INST-OI-44 was suspended from use and submitted to CBFO for approval and review on August 19, 2004. CBFO has reviewed INST-OI-44 Rev. 1, and AMWTP is in the process of resolving CBFO comments.

Verified by review of:

- CBFO Approval Memorandum, No. 04-0291, Kerry W. Watson to Brian Edgerton, dated November 1, 2004
- AMWTP procedure INST-OI-44, Revision 1, Self-Tapping Screw Sampling Port Installation, dated 10/21/04

### Actions to Preclude Recurrence:

1. The evaluation criteria in MP-DOCS-18.4, "Document Control" for screening new documents and revision to existing documents for CBFO review will be revised to ensure the criteria are specifically defined to ensure consistent and accurate determinations for submittal to CBFO. The revision to MP-DOCS-18.4 will be submitted to CBFO for review and approval.

Verified by review of CBFO Approval Memorandum, No. 05-0111, Kerry W. Watson to Brian Edgerton, dated January 8,

**CBFO CORRECTIVE ACTION REPORT**  
(continuation sheet)

1. CAR No: 04-038

2. Activity No: CBFO Audit A-04-22

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2005.

2. *A Lessons Learned will be developed and briefed to personnel responsible for creation or revision of AMWTP documents and procedures.*

Verified by review of Lessons Learned #2004-AMWT-008 distributed to personnel December 16, 2004 by Angie Morse..

3. *All personnel responsible for creation or revision to AMWTP documents and procedures will complete Required Reading of the changes to MP-DOCSA-18.4 following CBFO approval.*

Verified by review of:

- AMWTP Action Item #12170 issued to track completion of required reading for procedure MP-DOCS-18-4 upon receipt of approval from CBFO, originated by Angie Morse on December 16, 2004 and completed on January 18, 2005.
- Required reading notification, distributed via e-mail notification on January 11, 2005.

Based on the above supporting documentation and actions, it is recommended that this CAR be closed.

Block 19a: Verifier: \_\_\_\_\_

B.J. Verret

Date: 2/8/05

Block 19b: Trend Cause Code: 6.2

# CBFO CORRECTIVE ACTION REPORT

(continuation sheet)

1. CAR No: 04-039

2. Activity No: CBFO Audit A-04-22

3. Page 1 of 2

## Block #18 Verification of Corrective Action Completion

The corrective actions taken and implemented for the deficiencies identified within CAR 04-039 were evaluated based on the objective evidence provided by AMWTP in a memorandum from Jeff Snook to Ava L. Holland, dated January 19, 2005.

### Remedial Actions

1. *A Nonconformance Report was issued documenting the sample event as invalid, requiring a resampling event. Reverence AMWTP NCR 9254 issued 8/19/04 against waste container 10016708 as a failed sample event in HGAS Batch HS104-00117.*

Verified by review of AMWTP NCR 9254 issued August 19, 2004.

2. *A list of all containers sampled by the operator involved in these 2 events will be compiled and attached to this Corrective Action Report. This list will be documented through a query of the HGAS software for all instruments for containers listed with the operator's identification. A Nonconformance report will be issued against each waste container that was sampled by the operator and will require resampling.*

Verified by review of AMWTP CAR 9432, issued August 25, 2004, that identifies all affected drums and lists their corresponding NCR numbers.

### Actions to Preclude Recurrence:

1. *A Lessons Learned will be documented and briefed to all qualified HGAS Operator Technicians and Chemists to review the events, and the risk presented from procedural missteps that can invalidate collected samples. This Lessons Learned brief will include Conduct of Operations awareness, the need for a questioning attitude, and the consequences of instituting change or deviating from the normal process for procedural execution for the purposes of audit demonstration.*

Verified by review of:

- AMWTP Training Rosters for briefings to qualified HGAS Operator Technicians and Chemists.
  - Lessons Learned issued by Gail Rodgers on October 27, 2004.
2. *An operational verification has been added to INST-OI-43, Step 4.9.4 as an additional barrier to preclude recurrence of this condition. INST-OI-43 is under revision in preparation for submittal to CBFO and will include this verification action.*

Verified by review of:

- a. CBFO Approval Memorandum, No. 04-2300, Kerry W. Watson to Brian Edgerton, dated November 24, 2004
- b. AMWTP procedure INST-OI-43, Revision 3, HGAS Sampling and analysis Operations, dated 12/02/04

# CBFO CORRECTIVE ACTION REPORT

(continuation sheet)

1. CAR No: 04-039

2. Activity No: CBFO Audit A-04-22

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3. *A Lessons Learned will be documented and briefed to all Shift Managers and Shift team Leaders to review the incident. The briefing will include a Conduct of Operations discussion, the need for a questioning attitude, and the consequences of instituting change or deviating from the normal process for procedural execution for the purposes of audit demonstration.*

Verified by review of:

- AMWTP Training Rosters for briefings to qualified HGAS Operator Technicians and Chemists.
- Lessons Learned issued by Gail Rodgers on October 27, 2004.

Based on the above supporting documentation and actions, it is recommended that this CAR be closed.

Block 19a: Verifier: *B.J. Verret*  
B.J. Verret

Date: *2/8/05*

Block 19b: Trend Cause Code: *6.2*