



United States Government

Department of Energy

memorandum

Carlsbad Field Office
Carlsbad, New Mexico 88221

DATE: March 8, 2005

REPLY TO
ATTN OF: CBFO:QA:MPN:LC:05-0371-UFC:2300

SUBJECT: Issuance of CARs Initiated During Audit A-05-08 (RCRA)

To: Jeff Snook, DOE-ID

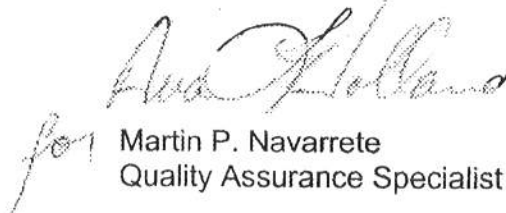


The Carlsbad Field Office (CBFO) performed certification Audit A-05-08 of the Idaho National Laboratory (INL) Advanced Mixed Waste Treatment Project (AMWTP) on March 1-4, 2005. As a result of this audit, ten CBFO Corrective Action Reports (CARs) were issued. The four Waste Isolation Pilot Plant Hazardous Waste Facility Permit related CBFO CARs 05-010 through 05-013 are attached. The other CARs will follow under separate cover.

Please document your proposed corrective actions and schedules for completion on the attached CAR continuation sheets and forward to me prior to the response due date identified in CAR block 14.

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 -7483.


for Martin P. Navarrete
Quality Assurance Specialist

Attachments

050313



cc w/attachments:

K. Watson, CBFO	*ED
A. Holland, CBFO	ED
R. McCallister, CBFO	ED
D. Swale, BNFL	ED
E. Schweinsberg, BNFL	ED
E. Dumas, BNFL	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
D. Winter, DNFSB	ED
C. Riggs, CTAC	ED
A. Pangle, CTAC	ED

CBFO M&RC

CBFO QA File

WIPP Operating Record, MS 486-06

*ED denotes electronic distribution

CORRECTIVE ACTION REPORT


1. CAR No.: 05-010	2. Activity Report No.: A-05-08	3. Page <u>1</u> of <u>2</u>
4. Controlling Document: WIPP-HWFP		5. CBFO Assessment Team Leader: M. Navarrete
6. Responsible Organization: : BNFL-AMWTP-RTR		7. CAQ Was Discussed With: Vincent Medina
8. Requirement that was violated: B1-3B(3) "All visual examination activities shall be documented on video/audio tape and the results of all visual examination shall be documented on visual examination data forms."		
9. Condition Adverse to Quality: During the performance of VE as a QC check on RTR, waste material was weighed on a calibrated scale within the glovebox. The weight scale readings were read aloud by the VE operator and recorded in the WTS. The reading were recorded on the audio record, however, the readings were not recorded on the video 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): No		
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>James R Oliver</u> <i>J. R. Oliver</i> Date: <u>3/3/05</u>		
14. Response Due Date: <u>3/21/05</u> Corrective Action Plan Required: <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO Required Corrective Action Completion Date: <u>N/A</u>		
15. a. Concurrence: <u>Ava K Holland</u> <u>3/8/05</u> b. <u>N/A</u> <u>N/A</u> Assessment Team Leader Date Responsible Assistant Manager Date <u>Ava K Holland</u> <u>3/8/05</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.: 05-010	2. Activity No.: A-05-08	3. Page <u>2</u> of <u>2</u>

CORRECTIVE ACTION REPORT

1. CAR No.: 05-011	2. Activity Report No.: A-05-08	3. Page <u>1</u> of <u>2</u>
4. Controlling Document: MP-TRUW-8.13, Rev. 9		5. CBFO Assessment Team Leader: C. Riggs
6. Responsible Organization: AMWTP		7. CAQ Was Discussed With: Vivian Sendelwick, Joan Connelly
<p>8. Requirement that was violated: MP-TRUW-8.13, Rev. 9, Section 1.0 states "Implementation of this procedure assures that a consistent, defensible, and auditable AK record is created for the Department of Energy (DOE) sites that generated transuranic (TRU) waste inventory to be characterized by the AMWTP, as well as preparing the AK for AMWTP operations. Section 4.2.1 states "Source documents for each generator site (including AMWTP) will be collected to document the required waste management program information as defined in the following:</p> <ul style="list-style-type: none"> • Types and quantities of TRU mixed waste generated, including historical generation through future projections." 		
<p>9. Condition Adverse to Quality: AK Summary for Supercompacted Debris Waste, BNFL-5232-RPT-TRUW-30, Rev. 9, needs to be revised to include the following:</p> <ul style="list-style-type: none"> • Section 1.2.4, Needs to include historical generation through future projections. • Table 1, Needs to include note for TWBIR numbers in column 1. • Section 1.6.2, Reference to [PO12] not applicable to subject. • Figure 2, Need to add where RTR and NDA processes are used and whether use is for plant use or waste certification. 		
10. Suggested Actions (Optional):		
11a. Significant CAQ (Yes or No): No		
11b. Work Suspension Recommended (Yes or No): No		
11c. RCRA-Related (Yes or No): Yes		
11d. Accelerated Corrective Action Required (Yes or No): No		
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>Martinez/Calvert</u>  Date: <u>03/07/05</u>		
14. Response Due Date: <u>3/21/05</u> Corrective Action Plan Required: <u>Yes</u>		
Required Corrective Action Completion Date: <u>N/A</u>		
15. a. Concurrence: <u>Ava Holland</u> <u>3/9/05</u> b. <u>N/A</u> <u>N/A</u>		
Assessment Team Leader	Date	Responsible Assistant Manager Date
c. <u>N/A</u> <u>N/A</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.: 05-011	2. Activity No.: A-05-08	3. Page ___ of ___
<p>Block # _____</p>		

CORRECTIVE ACTION REPORT

1. CAR No.: 05-012	2. Activity Report No.: A-05-08	3. Page <u>1</u> of <u>2</u>
4. Controlling Document: MP-TRUW-8.13, Rev. 9		5. CBFO Assessment Team Leader: C. Riggs
6. Responsible Organization: AMWTP		7. CAQ Was Discussed With: Vivian Sendelwick, Joan Connelly, Steve Carpenter
8. Requirement that was violated: MP-TRUW-8.13, Rev. 9, Section 4.0, AK documentation collected is incorporated into a referenceable document that presents AK information in a logical sequence progressing from general TRU waste management and plant operations to more detailed, waste stream-specific information in accordance with the Waste Isolation Pilot Plant (WIPP) Hazardous Waste Permit, Attachment B, Waste Analysis Plan (WAP) and the WIPP Contact-Handled (CH) TRU Waste Acceptance Criteria (WAC).		
9. Condition Adverse to Quality: AK documentation for INEEL Stored Transuranic RFETS Waste contains information for drummed waste only. However, RFETS waste in waste boxes is part of the waste to be supercompacted.		
10. Suggested Actions (Optional):		
11a. Significant CAQ (Yes or No): No <u>YES</u> Add 3/8/05		
11b. Work Suspension Recommended (Yes or No): No		
11c. RCRA-Related (Yes or No): Yes		
11d. Accelerated Corrective Action Required (Yes or No): No		
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>Martinez/Calvert</u> Date: <u>03/07/05</u>		
14. Response Due Date: <u>3/21/05</u> Corrective Action Plan Required: <u>Yes</u> Required Corrective Action Completion Date: <u>N/A</u>		
15. a. Concurrence: <u>And Holland</u> <u>3/8/05</u> b. <u>N/A</u> <u>N/A</u> Assessment Team Leader Date Responsible Assistant Manager Date <u>Add</u> <u>3/8/05</u> <u>3/8/05</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.: 05-012	2. Activity No.: A-05-08	3. Page ___ of ___
<p>Block # _____</p>		

CORRECTIVE ACTION REPORT

1. CAR No.: 05-013	2. Activity Report No.: A-05-08	3. Page <u>1</u> of <u>2</u>
4. Controlling Document: AMWTP INST-OI-12, Rev. 21	5. CBFO Assessment Team Leader: M. Navarrete	
6. Responsible Organization: AMWTP	7. CAQ Was Discussed With: Vince Medina	
<p>8. Requirement that was violated: AMWTP INST-OI-12, Rev 21, Section 4.9, Note 4, The contents of the waste container must be described in sufficient detail on the audio/video record to provide an adequate inventory of the waste container contents in the audio/video record narrative.</p> <p>AMWTP INST-OI-12, Rev 21, Exhibit 6 - List of Prohibited Items, Sealed Containers greater than 4 liters, Lids that are screwed into place or taped should be considered sealed.</p>		
<p>9. Condition Adverse to Quality:</p> <p>During review of the audio/videotape of the RTR for drums # 10002936 and 10004014 it was noted that the operator did not describe the waste as he scanned the drum. The operator statement was limited to confirming the IDC at the end of the scan.</p> <p>Drum #10021668 had an IDC BL-010 Paper, Gloves, Poly. RTR revealed a steel pipe with a welded bottom and a threaded cap held in place by plywood spacers. The pipe appeared to be a sealed container greater than 4 liters.</p>		
10. Suggested Actions (Optional):		
11a. Significant CAQ	(Yes or No): YES <u>NO</u>	<u>NA</u> 3/8/05
11b. Work Suspension Recommended	(Yes or No): NO	
11c. RCRA-Related	(Yes or No): YES	
11d. Accelerated Corrective Action Required	(Yes or No): NO	
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: James R. Oliver <i>James R. Oliver</i> Date: 03/03/05		
14. Response Due Date: <u>3/21/05</u> Corrective Action Plan Required: YES		
Required Corrective Action Completion Date: <u>N/A</u>		
15. a. Concurrence: <u>Ava Holland</u> <u>3/8/05</u>	b. <u>N/A</u>	<u>N/A</u>
Assessment Team Leader	Date	Responsible Assistant Manager
c. _____	Date	Date
Quality Assurance Manager		
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)		
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Name	Date	
19b. Trend Cause Code: _____		
20. Closure: _____		
Quality Assurance Manager	Date	

CBFO CORRECTIVE ACTION REPORT

(continuation sheet)

1. CAR No.: 05-013	2. Activity No.: A-05-08	3. Page <u>2</u> of <u>2</u>
<p>Block #</p>		