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United States Government

Department of Energy

# memorandum

Carlsbad Field Office  
Carlsbad, New Mexico 88221



DATE: March 28, 2005  
REPLY TO  
ATTN OF: CBFO:QA:MPN:LC:05-0903:UFC:2300  
SUBJECT: CARs 05-011 and 05-012 Closure Packages  
TO: Jeff Snook, DOE-ID

The Carlsbad Field Office (CBFO) performed verification of corrective action completion for Corrective Action Reports (CARs) 05-011 and 05-012. The corrective actions taken and implemented for these CARs have been evaluated by the review of the objective evidence submitted in the CAR closure package transmitted via letter ED-AMWTP-017-2005, dated March 21, 2005. The results of the evaluation indicate that AMWTP has addressed the issues identified in CARs 05-011 and 05-012 and has implemented the corrective actions for this issue.

The CAR Continuation Sheet documenting corrective action completion and closure of CARs 05-011 and 05-012 is attached.

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

Martin P. Navarrete  
Senior Quality Assurance Specialist

### Attachments

- 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
- S. Holmes, 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. Price, LANL ED
- CBFO M&RC
- CBFO QA File
- WIPP Operating Record, MS 486-06
- \*ED denotes electronic distribution

050367



( **80 CORRECTIVE ACTION REPORT** )

(Continuation Sheet)

1. CAR No. 05-011

2. Activity Report No. A-05-08

3. Page 1 Of 2

**Block 18: Verification of Corrective Action Completion**

The corrective actions taken and implemented for this CAR were evaluated based on closure documentation package transmitted to CBFO via letter number ED-017-2005, dated 3/21/2005. The corrective actions and objective evidence reviewed and found to be satisfactory are as follows:

**Remedial Action:**

BNFL-5232-RPT-TRUW-30, Acceptable Knowledge (AK) for Supercompacted Debris Waste will be revised to include the following:

- Section 2.4, to show end data for generation dates.
- Table 1, to include note for TWBIR numbers in column 1
- Section 1.5:2, provide correct reference as replacement for reference PO12
- Figure 2; add where RTR and NDA processes are used and whether used for plant use of waste certification.

**Verification Results:**

Verified through review of the closure documentation package that AMWTP initiated DCR 3409 for revision to BNFL-5232-RPT-TRUW-30 on March 18, 2005. Verified BNFL-5232-RPT-TRUW-30, dated March 21, 2005 was revised to address the above items.

**Investigative Action and Root Cause Identification:**

A review of the reported condition was conducted by Elvin Dumas, the AMWTP QA Manager, and Eric Schweinsberg, the AMWTP Site Project Manager to determine the facts and identify the root cause(s) that led to the issue.

The reported condition has been reviewed and the determination reached that the issue was caused through Human error and lack of attention to detail to ensure the content of the AK Report was completed.

The conclusion from this review is that human performance is less than adequate to fulfill the requirements to ensure the content of the AK Report is complete.

**Verification Results:**

Verified that AMWTP adequately performed an investigation to determine the extent of the condition by review of the AMWTP CAR 12744 and its attachment, as well as the submitted objective evidence.

**Corrective Actions to Preclude Recurrence:**

1. The Site Project Manager will brief the Acceptable Knowledge Experts (AKE) on the revision of BNFL-5232-RPT-TRUW-30.
2. The Site Project Manager will review the requirements of the WAP permit attachment B4 for preparation of Acceptable Knowledge Summaries to Waste Stream Profiles with the AKEs.
3. A Lessons Learned will be developed and briefed to SPM and AKE personnel regarding this event.
4. BNFL-5232-RPT-TRUW-30 (latest revision) and the Lessons Learned will be a required read for RTR and VE operators and SPMs and AKEs.

**Verification Results:**

1. Verified through review of AMWTP Training Rosters that AKE attended briefings on the revision to BNFL-5232-RPT-TRUW-30.

(Continuation Sheet)

1. CAR No. 05-011

2. Activity Report No. A-05-08

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**Block 18: Verification of Corrective Action Completion**

The corrective actions taken and implemented for this CAR were evaluated based on closure documentation package transmitted to CBFO via letter number ED-017-2005, dated 3/21/2005. The corrective actions and objective evidence reviewed and found to be satisfactory are as follows:

**Remedial Action:**

BNFL-5232-RPT-TRUW-30, Acceptable Knowledge (AK) for Supercompacted Debris Waste will be revised to include the following:

- Section 1.2.4, to show end data for generation dates
- Table 1, to include note for TWBIR numbers in column 1
- Section 1.6.2, provide correct reference as replacement for reference PO12
- Figure 2; add where RTR and NDA processes are used and whether used for plant use of waste certification.

**Verification Results:**

Verified through review of the closure documentation package that AMWTP initiated DCR 3409 for revision to BNFL-5232-RPT-TRUW-30 on March 18, 2005. Verified BNFL-5232-RPT-TRUW-30, dated March 21, 2005 was revised to address the above items.

**Investigative Action and Root Cause Identification:**

A review of the reported condition was conducted by Elvin Dumas, the AMWTP QA Manager, and Eric Schweinsberg, the AMWTP Site Project Manager to determine the facts and identify the root cause(s) that led to the issue.

The reported condition has been reviewed and the determination reached that the issue was caused through Human error and lack of attention to detail to ensure the content of the AK Report was completed.

The conclusion from this review is that human performance is less than adequate to fulfill the requirements to ensure the content of the AK Report is complete.

**Verification Results:**

Verified that AMWTP adequately performed an investigation to determine the extent of the condition by review of the AMWTP CAR 12744 and its attachment, as well as the submitted objective evidence.

**Corrective Actions to Preclude Recurrence:**

1. The Site Project Manager will brief the Acceptable Knowledge Experts (AKE) on the revision of BNFL-5232-RPT-TRUW-30.
2. The Site Project Manager will review the requirements of the WAP permit attachment B4 for preparation of Acceptable Knowledge Summaries to Waste Stream Profiles with the AKEs.
3. A Lessons Learned will be developed and briefed to SPM and AKE personnel regarding this event.
4. BNFL-5232-RPT-TRUW-30 (latest revision) and the Lessons Learned will be a required read for RTR and VE operators and SPMs and AKEs.

**Verification Results:**

1. Verified through review of AMWTP Training Rosters that AKE attended briefings on the revision to BNFL-5232-RPT-TRUW-30.

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1. CAR No. 05-011	2. Activity Report No. A-05-08	3. Page 1 Of 2
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2. Verified through review of AMWTP Training Rosters that AKE attended briefings on the requirements of the WAP permit attachment B4 for preparation of Acceptable Knowledge Summaries to Waste Stream Profiles.
3. Verified a Lessons Learned was developed to address the deficiency on CBFO CAR 05-011.
4. Verified Required Reading was accomplished through review of Training Rosters for BNFL-S232-RPT-TRUW-30 (latest revision) and the Lessons Learned for RTR and VE operators and SPMs and AKEs.

**Block 18: Verification of Corrective Action Completion (Continued)**

Based on the above supporting documentation and actions, it is recommended that CAR 05-011 be closed.

Block 19a: Verifier: Priscilla Martinez Date: 3/23/05  
Priscilla Martinez

Block 19b: Trend Cause Code: 3.2

# CBFO CORRECTIVE ACTION REPORT

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1. CAR No. 05-012	2. Activity Report No. A-05-08	3. Page <u>1</u> Of <u>3</u>
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**Block 18: Verification of Corrective Action Completion**

The corrective actions taken and implemented for this CAR were evaluated based on closure documentation package transmitted to CBFO via letter number ED-017-2005, dated 3/21/2005. The corrective actions and objective evidence reviewed and found to be satisfactory are as follows:

**Remedial Action:**

BNFL-5232-RPT-TRUW-30, Acceptable Knowledge (AK) for Supercompacted Debris Waste will be revised to include the RFETS standard waste box (SWB) inventory and ensure the AK information regarding the SWB population satisfies the requirements of the WAP, permit attachment B4. The revision to BNFL-5232-RPT-TRUW-30 will include review and reference back to the information on boxed waste documented in RFETS AK Background Report INEL-96/0280, Rev. 2.

**Verification Results:**

Verified through review of the closure documentation package that AMWTP initiated DCR 3409 for revision to BNFL-5232-RPT-TRUW-30 on March 18, 2005. Verified BNFL-5232-RPT-TRUW-30, dated March 21, 2005 was revised to address the RFETS waste in waste boxes as part of the waste to be supercompacted.

**Investigative Actions:**

A review of the reported condition was conducted by Elvin Dumas, the AMWTP QA Manager, and Eric Schweinsberg, the AMWTP Site Project Manager to determine the facts and identify the root cause(s) that led to the issue.

A review of the RFETS AK Background Report INEL-96/0280, Rev. 3 was conducted to determine the adequacy of the Acceptable Knowledge Experts' (AKEs) evaluations of historical AK information. Revision 3 of the AK Report does not include boxed waste. However, the boxed waste was identified in Revision 2 of the report in Appendix B, INEEL Accessible Storage TRU Waste Inventory-Rocky Flats Waste with the note that the waste was packaged in boxes and was not assessed for the report. The boxed waste and the drummed waste were generated during the same time frame and from the same processes. The corrective actions outlined in the CAP will demonstrate this once completed. The specific information to be obtained is:

- Inventory of boxed waste by IDC.
- Determine the reason for the difference in container type.
- Determine any differences (such as process, building, HWN, radioactivity) in waste packaged in boxes rather than drums.
- Obtain Box description (e.g., size, material, surface, etc.), packaging used, etc.
- Obtain additional AK for wastes (IDCs 460, 463, 488, 491, 831, 832, and 833) not covered in the RFETS AK Summary Report, INEL-96/0280 R3.
- Write a memo to file (C289A) summarizing the pertinent information as an "addendum" to the RFETS AK Summary Report.
- BNFL-5232-RPT-TRUW-30 will be revised to include this reference, as well as other pertinent information.

The Individual Training Plans of AMWTP Acceptable Knowledge Experts (AKE's) were also reviewed to determine the adequacy of AKE training. The content in the Training documentation was determined to address fully, the requisite knowledge and skills necessary for preparing the individuals for their work in preparing, reviewing and writing Acceptable Knowledge documents.

The conclusion from this review is that the training and qualification requirements are adequate to ensure personnel qualified as AKE's have the necessary knowledge and skills to fulfill the requirements of the program.

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1. CAR No. 05-012

2. Activity Report No. A-05-08

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The AK Summary report did not include specific box descriptions, but does address critical waste stream information. The omission of the fact that the waste was also contained in boxes has been determined to be the result of an oversight and lack of attention to detail to ensure that the content of the AK Report was complete.

**Verification Results:**

Verified that AMWTP adequately performed an investigation to determine the extent of the condition by review of the AMWTP CAR 12743 and its attachment, as well as the submitted objective evidence.

**Corrective Actions to Preclude Recurrence:**

1. The Site Project Manager will brief the Acceptable Knowledge Experts (AKE) on the revision of BNFL-5232-RPT-TRUW-30.
2. The Site Project Manager will review the requirements of the WAP permit attachment B4 for preparation of Acceptable Knowledge Summaries to Waste Stream Profiles with the AKEs.
3. A Lessons Learned will be developed and briefed to SPM and AKE personnel regarding this event.
4. BNFL-5232-RPT-TRUW-30 (latest revision) and the Lessons Learned will be a required read for RTR and VE operators and SPMs and AKEs.
5. Obtain the inventory of boxed waste by IDC from RFETS to determine/assess why different containers were used in packaging waste, and identify waste box materials of construction.
6. Determine any differences (such as process, building, HWN, radioactivity) in waste packaged in boxes rather than drums.
7. Obtain additional AK for wastes (IDCs 460, 463, 488, 491, 831, 832, and 833) not covered in the RFETS AK Summary Report, INEL-96/0280 R3. BNFL-5232-RPT-TRUW-30 will be revised to address this information and the requirement to evaluate the AK for boxed waste from other sites prior to processing.
8. Write a memo to file (C289A) summarizing the pertinent information as an "addendum" to the RFETS AK Summary Report, and revise BNFL-5232-RPT-TRUW-30 with the appropriate information.

**Verification Results:**

1. Verified through review of AMWTP Training Rosters that AKE attended briefings on the revision to BNFL-5232-RPT-TRUW-30.
2. Verified through review of AMWTP Training Rosters that AKE attended briefings on the requirements of the WAP permit attachment B4 for preparation of Acceptable Knowledge Summaries to Waste Stream Profiles.
3. Verified a Lessons Learned was developed to address the deficiency on CBFO CAR 05-012.
4. Verified Required Reading was accomplished through review of Training Rosters for BNFL-5232-RPT-TRUW-30 (latest revision) and the Lessons Learned for RTR and VE operators and SPMs and AKEs.
5. Verified RFETS inventory of boxed waste was evaluated by review of objective evidence.
6. Verified evaluation was performed for differences in waste packages (drums vs. boxes).

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1. CAR No. 05-012

2. Activity Report No. A-05-08

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- 7. Verified BNFL-5232-RPT-TRUW-30 was revised to address IDCs not covered in the RFETS AK Summary Report, INEL-96/0280, Rev. 3.
- 8. Verified a memo (C289A) was added to the RFETS AK Summary Report and BNFL-5232-RPT-TRUW-30 was revised with the appropriate information.

Block 18: Verification of Corrective Action Completion (Continued)

Based on the above supporting documentation and actions, it is recommended that CAR 05-012 be closed.

Block 19a: Verifier:

  
Porf Martinez

Date:

3/23/05

Block 19b: Trend Cause Code: 3.2