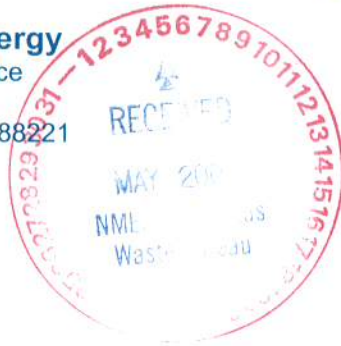




Department of Energy
Carlsbad Field Office
P. O. Box 3090
Carlsbad, New Mexico 88221

May 3, 2005



ENTERED

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: NMED Inquiry Regarding CAR 05-027

Dear Mr. Zappe:

As requested in your e-mail dated April 22, 2005, I have reviewed my decision that Corrective Action Report (CAR) 05-027 is not Waste Analysis Plan (WAP) related. This CAR was issued to address an unmet requirement contained in the Central Characterization Project (CCP) procedure CCP-TP-053. This procedural requirement is for the radiography operator to include the image test pattern on the videotape. Contrary to this procedural requirement, this was not done on the videotape for batch LA-RTR1-04-0005. There was, however, objective evidence in the batch data report for this batch that the image test pattern was satisfactory for that day, as evidenced by the CCP Real Time Radiography (RTR) Measurement Test Control Report signed by the radiography operator.

Although this was clearly a violation of the CCP procedure, the condition adverse to quality did not appear to violate any provision of the WAP. For this reason, the CAR was determined not to be WAP related. In your e-mail you asked me to reconsider this conclusion in light of the requirements in Permit Attachment B3, Section B3-4. You specifically referred to the statement that, "The Quality Assurance Objectives (QAOs) for radiography are detailed in this section. If the QAOs described below are not met, then corrective action shall be taken... Data to meet these objectives must be obtained from an audio/videotaped (or equivalent media) scan...".

Having reviewed this requirement in the context of the radiography method described in the Permit, I still believe that the Permit does not require the image test pattern to be recorded on the videotape. This is because the term "scan", as used in Permit Attachment B1, Section B1-3 refers to a waste container examination. Section B1-3 says, "To perform radiography, the waste container is scanned while the operator views the television screen. An audio/videotape or equivalently non-alterable media is made of the waste container scan and is maintained as a non-permanent record". In the same context, the "scan" referred to in Permit Attachment B3, Section B3-4 is the examination of a waste container. Because the image test pattern check is not a part of the "scan" of a waste container, it is not required to be recorded on the audio/videotape per the WAP. In addition, the QAO for precision described in Section B1-3 states, "...the precision of radiography is verified prior to use ... through viewing an image test



Mr. Steve Zappe

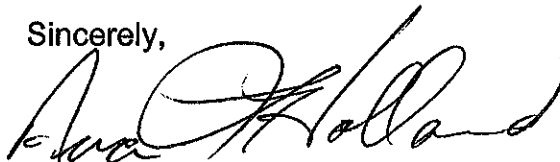
-2-

May 3, 2005

pattern". I considered the documented objective evidence of the CCP RTR Measurement Test Control Report signed by the radiography operator to be sufficient to verify that this WAP-required action had been performed. Neither the remainder of the QAO for precision, nor the following QAOs for accuracy, completeness and comparability contain any requirement that the test pattern be included on the videotape. For these reasons I determined that CAR 05-027 was not WAP related. The classification of this CAR was discussed by members of my audit staff with members of your staff at the conclusion of Audit A-05-09, and they concurred with the opinion that it was not WAP related.

Please contact me at (505) 234-7423 should you have any questions concerning this notification.

Sincerely,



Ava Holland
Quality Assurance Manager

cc:

I. Triay, CBFO	*ED
L. Piper, CBFO	ED
D. Miehl, CBFO	ED
K. Watson, CBFO	ED
R. McCallister, CBFO	ED
M. Eagle, EPA	ED
S. Holmes, NMED	ED
J. Bearzi, NMED	ED
P. Martinez, CTAC	ED

CBFO QA File

CBFO M&RC

WIPP Operating Record, MS 486-06

*ED denotes electronic distribution