



Department of Energy
 Carlsbad Field Office
 P. O. Box 3090
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ENTERED



June 1, 2005

Mr. Farok Sharif
 Washington TRU Solutions
 P.O. Box 2078
 Carlsbad, NM 88221-2078

Subject: Corrective Action Verification and Closure of CARs 05-027 and 05-028

Dear Mr. Sharif:

The Carlsbad Field Office (CBFO) has evaluated the Corrective Action Plans (CAPs) for Corrective Action Reports (CARs) 05-027 and 05-028 and reviewed the associated objective evidence documenting corrective action taken. The results of the evaluation indicate that the Central Characterization Program (CCP) has adequately addressed the issues identified in the referenced CARs and these CARs are now considered closed. The CAR Continuation Sheets documenting completion of these activities is enclosed for your information.

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

Sincerely,

Dennis S. Miehl
 Senior Quality Assurance Specialist

Enclosures

cc: w/enclosures

A. Holland, CBFO	*ED	S. Yeager, LANL	ED
K. Watson, CBFO	ED	A. Fisher, WTS	ED
J. Nunz, LASO	ED	D. Haar, WTS	ED
M. Eagle, EPA	ED	P. Martinez, CTAC	ED
B. Shroff, EPA	ED	A. Pangle, CTAC	ED
R. Joglekar, EPA	ED	CBFO QA File	
S. Zappe, NMED	ED	CBFO M&RC	
S. Holmes, NMED	ED	WIPP Operating Record, MS 486-06	
D. Winters, DNFSB	ED		

*ED denotes electronic distribution



CBFO CORRECTIVE ACTION REPORT

(continuation sheet)

1. CAR No.: 05-028

2. Activity No.: A-05-09

3. Page 1 of 1

Block # 18 Verification of Corrective Action completion

The corrective actions taken and implemented for the deficiencies identified in CBFO CAR -05-028 were evaluated based on the objective evidence provided in the Corrective Action Plan for CAR 05-028 that accompanied the WTS/CCP letter dated May 17, 2005 (CP:05:01158), from Farok Sharif to Dennis Miehl. The corrective actions relative to the Remedial Action, Investigative Actions, Root Cause, and Actions to Preclude Recurrence as described in the LANL/CCP closure package have been verified by reviewing the following areas:

Remedial Action

The handrails were labeled next to each TRUPACT-II in accordance with the requirements listed in CCP-QP-017, *CCP Identification and Control of Items*, signifying the o-ring "set aside" area for each. This will ensure that sets of o-rings, for a particular TRUPACT-II are segregated from one another.

A tagging system was developed and implemented in accordance with the requirements listed in CCP-QP-017, *CCP Identification and Control of Items*, in order to ensure that the o-rings are labeled (ICV Upper, ICV Lower, OCV Upper, and OCV Lower) as they are removed from the TRUPACT-II, and prior to placing them in the set aside area. This will ensure that the operators consciously segregate the ICV and OCV o-rings from one another. The segregation and labeling will ensure that the o-rings are installed in the proper location after cleaning, inspection and lubrication.

Operators were briefed on the new process immediately; all Mobile Loading team members have since been briefed on the new process by the TCO/Field Operations Lead.

Investigative Actions

- EXTENT - CCP-QP-017 provides the instructions for controlling items to ensure correct reinstallation. The TP-II Operators currently employ a "shadow board" as the mechanism to mark and segregate components removed from the TRUPACT-II. They had not used this system for the o-rings, as they believed that the size difference between the o-rings could be used to ensure correct placement. As such, marking and segregation was viewed as unnecessary.
- IMPACT - The impact of this deficiency is minimal. The successful completion of the helium leak test ensures adequate installation has been achieved.

Root Cause

The o-rings were not marked and segregated because the operators considered the dimensional differences between the two o-rings adequate to identify each.

Actions to Preclude Recurrence

The remedial actions described above are sufficient to preclude recurrence.

The Closure Package that documents these actions taken relative to CBFO CAR 05-028 has been reviewed and verified as having addressed all corrective actions required by CAR 05-028. This closure package is acceptable and closure of CAR 05-028 is recommended.

Block # 19a Verified By: _____

Todd Sellmer

Date: 5/27/05

Block # 19b Trend Code: TR-01

CBFO CORRECTIVE ACTION REPORT

(continuation sheet)

1. CAR No.: 05-027

2. Activity No.: A-05-09

3. Page 1 of 1

Block # 18 Verification of Corrective Action completion

The corrective actions taken and implemented for the deficiencies identified in CBFO CAR -05-027 were evaluated based on the objective evidence provided in the Corrective Action Plan for CAR 05-027 that accompanied the WTS/CCP letter dated May 17, 2005 (CP:05:01158), from Farok Sharif to Dennis Miehl. The corrective actions relative to the Remedial Action, Investigative Actions, Root Cause, and Actions to Preclude Recurrence as described in the LANL/CCP closure package have been verified by reviewing the following areas:

Remedial Action

A Non-Conformance Report (NCR) NCR-LANL-0061-05, R.0 was generated for LA-RTR1-04-0005 to reflect the condition identified in CAR 05-027. All drums in the batch were rejected for not meeting the Waste Analysis Plan Quality Control requirements.

A review of the videos for the image test patterns on all RTR videotapes was completed. No further deficiencies were identified.

Investigative Actions

- **EXTENT** – This BDR was generated on April 22, 2004. During this timeframe, CCP identified, documented, and corrected specific instances of procedural non-compliance within CCP RTR operations at the LANL site. In order to correct these deficiencies, CCP ultimately deployed an experienced CCP RTR team to the LANL site to assist with training on-site personnel and ensure consistency with CCP operations throughout the DOE complex. This deployment occurred in March of 2005, and since that time no further instances of procedure noncompliance have been noted. Additionally, a completed review of all CCP LANL RTR tapes and a random check of ten tapes from all active CCP sites was performed. No similar deficiencies were identified. As such, the extent of this deficiency is limited to a single batch at the LANL site.
- **IMPACT** – The impact of this deficiency is minimal. The affected batch of drums was rejected, and will reprocessed through RTR.

Root Cause

The Root Cause was attributed to procedure non-compliance. The procedure requires that the tape be rewound and reviewed to ensure the image was recorded. The image test pattern review had been conducted and recorded in the control report form; however, this action was not recorded on the tape.

Actions to Preclude Recurrence

The deployment of an experienced CCP RTR team to the LANL site has corrected this deficiency as described in section 2.a of this corrective action plan.

case length gauge and shellholder

The Closure Package that documents these actions taken relative to CBFO CAR 05-027 has been reviewed and verified as having addressed all corrective actions required by CAR 05-027. This closure package is acceptable and closure of CAR 05-027 is recommended.

Block # 19a Verified By: _____

Priscilla Martinez

Date: 6/1/05

Block # 19b Trend Code: RT-06