



**Department of Energy**  
 Carlsbad Field Office  
 P. O. Box 3090  
 Carlsbad, New Mexico 88221  
 July 16, 2008



Mr. David H. Haar  
 Central Characterization Project  
 Washington TRU Solutions  
 P.O. Box 2078  
 Carlsbad, NM 88221-2078

**Subject: Evaluation of the Documentation Supporting Closure of the Corrective Actions Associated with CBFO Corrective Action Report 08-021**

Dear Mr. Haar:

The results of the CBFO review and evaluation of documentation supporting closure of the corrective actions associated with CBFO Corrective Action Report (CAR) 08-021 are included on the attached CAR continuation sheets. This CAR resulted from CBFO Audit A-08-16 of the Los Alamos National Laboratory Central Characterization Project.

Based on the evaluation of the documentation provided, it has been determined that the corrective actions have been completed for precluding recurrence. Accordingly, the CAR is considered closed.

If you have any questions or comments, please contact me at (575) 234-7491.

Sincerely,

Dennis S. Miehl  
 Senior Quality Assurance Specialist

Enclosure

Mr. David H. Haar

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July 16, 2008

cc: w/ enclosure

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WIPP Operating Record, MS: 452-09

CBFO QA File

CBFO M&RC

\*ED denotes electronic distribution

# CBFO CORRECTIVE ACTION REPORT

(continuation sheet)

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## Block # 17 Acceptance of Corrective Action Completion:

An evaluation has been performed of the documentation supporting completion of the corrective actions associated with CBFO CAR 08-021. This CAR involved incorrect identifications of the Visual Examination (VE) methods used ("VE in lieu of radiography," instead of "VE for repackaged waste") on the associated data forms. The documentation supporting completion of the corrective actions was submitted to CBFO via CCP memorandum (CP:08:00321) dated June 25, 2008.

The supporting documentation provided included the following:

### Remedial Action(s):

CCP directive requiring VE personnel at LANL to mark the VE data form as "VE for Repackaged Waste" unless the activity is VE of newly generated waste.

**Evidence:** Copy of an email (dated April 30, 2008) directing VE personnel at LANL to mark VE data forms as "VE for Repackaged Waste" unless the activity is VE of newly generated waste, and a copy of the VE logbook with an entry noting that all future VE processes performed at LANL will be marked on the data form as "VE for Repackaged Waste" unless the VE is for newly generated waste.

Modification of the Site Project Manager VE Project Level Validation and Verification checklist and summary batch data reports for the affected VE batch data reports.

**Evidence:** Copies of the letters placed in each of the affected batch data reports (BDRs) (LAVE500092 through LAVE500130) acknowledging that the VE operators had incorrectly noted the associated BDRs as "VE in lieu of Radiography," as opposed to the correct annotation of "VE for Repackaged Waste." Since the issue of the CAR was specific to the incorrect annotation of the VE method used, which does not negatively affect the validity of the data, the letters serve as the means for correcting the affected BDRs without acquiring technical reviews.

### Investigative Action(s):

As documented in the associated corrective action plan, CCP conducted investigative actions to determine the extent and impact of the CAR condition. As a result of the investigation, CCP determined that the condition posed no technical impact and was limited to the activities performed at Los Alamos National Laboratory (LANL).

### Root Cause Determination:

Based upon investigation, CCP determined that the root cause of the condition was inadequate direction in the procedure for VE (CCP-TP-113) to ensure that a consistent classification is

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selected and noted on the associated VE data form.


**Action(s) to Preclude Recurrence:**

Revise Procedure CCP-TP-113, *CCP Standard Contact-Handled Waste Visual Examination*

**Evidence:** Verified that CCP-TP-113, Revision 10 was issued and became effective on July 9, 2008, within the Quality & Maintenance Information System (Q&MIS).

**Conclusion:**

Based on the evaluation of the evidence provided, it has been determined that the actions taken to resolve the conditions noted within this CAR are complete for precluding recurrence. Accordingly, it is recommended that CAR 08-021 be closed.

  
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Response Evaluated By: Berry D. Pace

July 14, 2008  
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Date