



United States Government

Department of Energy

# memorandum

Carlsbad Field Office  
Carlsbad, New Mexico 88221

DATE: July 17, 2008

REPLY TO  
ATTN OF: CBFO:QA:MPN:KBS:08-0392:UFC 2300

SUBJECT: Evaluation of the Corrective Action Plan for Corrective Action Report 08-035  
Recertification Audit A-08-18, Hanford TRU Program

TO: Larry Romine, DOE-RL



Attached are the results of Carlsbad Field Office (CBFO) evaluation of the Hanford TRU Program proposed corrective action plan (CAP) for CBFO Corrective Action Report (CAR) 08-035 resulting from the Recertification Audit A-08-18.

The proposed corrective actions for the root cause determination and the investigative actions were found to be unacceptable as documented on the CAP response. Please provide a revised response addressing the issues documented on the attached CAR Continuation Sheet on or before July 25, 2008.

If you have any questions or concerns regarding this evaluation, please contact me at (575) 234-7483.

Martin P. Navarrete  
Senior Quality Assurance Specialist

Attachment

080720



Larry Romine

-2-

July 17, 2008

cc: w/attachment  
A. Holland, CBFO \*ED  
N. Castaneda, CBFO ED  
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WIPP Operating Record, MS: 452-09  
CBFO QA File  
CBFO M&RC

# CAR CONTINUATION SHEET

1. CAR No: 08-035

2. Activity No: A-08-18

3. Page 1 of 1

**Block # 17 Acceptance of Proposed Corrective Action**

The following is an evaluation of the proposed corrective action plan (CAP) for CBFO CAR 08-035 submitted via Fluor Hanford letter dated July 10, 2008 (letter number FH-0801651), from Richard P. Dunn to M. Navarrete. A review was performed of the proposed CAP associated with remedial action, investigative action, root cause determination, and action to preclude recurrence, submitted by the above referenced letter. It was determined that the proposed corrective actions relative to the root cause determination and investigative action are unacceptable for the following reasons:

**Root Cause Determination:**

The current root cause determination appears to use permit modification as a justification for not requiring VET personnel to be re-qualified per the same requirements as VE Operators.

The HWFP has never relaxed the requirement for personnel performing VE and qualified as VE Operators to be re-qualified every two years. In addition, the use of the VET to perform visual examination of newly generated wastes has always required the VET to be performed by two individuals who are qualified as VE Operators.

CBFO has verified that in the past, the Hanford TRU Program procedures did indeed require re-qualification of VE and VET personnel every two years. At some point in time, the Hanford TRU Program elected to relax the requirement for personnel performing VET. The root cause determination must be revised to include and address when the requirement was relaxed and dropped from the TRU program procedures, including the rationale for deleting the requirement. Establishing the root cause timeline is crucial to adequately addressing the investigative actions required for this CAR.

**Investigative Actions:**

Item 3: Regardless of Permit Modification interpretation, the listing of BDRs/containers must address the time frame when Hanford deleted the requirement for personnel performing VET to be re-qualified every two years.

The personnel performing VET whose qualification could have lapsed because of the Hanford decision must be identified, as well as the containers they have examined. The "waste in the inventory" defined in the CAP must include all BDRs/Containers processed within the identified time envelope (including those on site and those shipped). In addition, differentiation between VE and VET as the examination process must be included in the list. If new NCRs are issued as a result of VE or VET being performed by unqualified personnel, copies of the NCRs must be provided to CBFO.

It is recommended that the CAP for CAR 08-035 not be approved.

Response Evaluated By: \_\_\_\_\_

*A. Earl Bradford*  
ATL, A. Earl Bradford

*July 16, 2008*  
Date

**Table 10. Tiering of TRU WC Processes Implemented by Hanford  
Based on June 4–7 and 27, 2007 On Site Baseline Inspection**

| WC Process Elements  | Hanford WC T1 Changes   | Hanford WC T2 Changes <sup>a</sup>  |
|--|---|---|
| Acceptable Knowledge (AK) and Load Management                  | Implementation of load management; AK (5)<br><br>New waste streams created as a result of combining or separating previously distinct waste streams <sup>b</sup> ; AK (6)<br><br>Categories of waste not approved under this baseline inspection (e.g., soil/gravel, newly-generated solids including K Basin waste); AK (16) | Notification to EPA upon completion of AK Accuracy Reports; AK (2)<br><br>Notification to EPA upon completion of updates to or substantive modifications <sup>c</sup> of the following: <ul style="list-style-type: none"> <li>- AK Summaries/Waste Stream Profile Forms (WSPFs) and AK Documentation Reports; AK (16)</li> <li>- AK-NDA Communication changes; AK (3)</li> <li>- Changes to site procedure WMP 400.7.1.9; AK (4)</li> </ul> Notification to EPA upon generation of new WSPFs, AK summaries and AK documentation reports; AK (16) |
| Nondestructive Assay (NDA)                                     | New equipment or physical modifications to approved equipment <sup>d</sup> ; NDA (1) <sup>e</sup><br><br>Extension or changes to approved calibration range for approved equipment; NDA (2) <sup>e</sup>  | Notification to EPA upon completion of changes to software for approved equipment, operating range(s) and site procedures that require CBFO approval; NDA (2) <sup>d</sup>  |
| Real-Time Radiography (RTR)                                    | N/A   | Notification to EPA upon the following: <ul style="list-style-type: none"> <li>- Implementation of new RTR equipment or substantive changes**** to approved equipment; RTR (1)</li> <li>- Completion of changes to site RTR procedures requiring CBFO approval; RTR (2)</li> </ul>  |
| Visual Examination (VE) and Visual Examination Technique (VET) | Implementation of VE and/or VET for retrievably-stored or newly-generated wastes from SCGs other than S5000; VE (2) and VET (2)   | Notification to EPA upon the following: <ul style="list-style-type: none"> <li>- Completion of changes to site VE and VET procedures requiring CBFO approval; VE (1) and VET (1)</li> <li>- Addition of a new waste stream(s) from the S5000 SCG; VE (2) and VET (2)</li> </ul>   |
| WIPP Waste Information System (WWIS)                           | Implementation of load management; WWIS (4)   | Notification to EPA upon the completion of changes to WWIS procedure(s) requiring CBFO approval; WWIS (1)   |

<sup>a</sup>Upon receiving EPA approval in this action, Hanford will report all T2 changes to EPA at the end of each fiscal year quarter.

<sup>b</sup>EPA's determination applies to those waste streams that have been identified, through AK, as consisting predominantly of a specific SCG that are later found to consist predominantly of other SCGs requiring identification of an entirely new, unanticipated waste stream

<sup>c</sup>*Substantive changes* means changes with the potential to impact the site's waste characterization activities or documentation thereof, excluding changes that are solely related to Environmental Safety & Health (ES&H), nuclear safety, the Resource Conservation and Recovery Act (RCRA) or are editorial in nature.

<sup>d</sup>Modifications to approved equipment include all changes with the potential to affect NDA data relative to waste isolation and exclude minor changes, such as the addition of safety-related equipment.

<sup>e</sup>These are discussed in Sections (1) and (2) of the section for each NDA system, i.e., 8.2.1 for WRAP GEA A and B, 8.2.2 for WRAP IPAN A and B, 8.2.3 for WRAP SHENCA and 8.2.4 for PFP Calorimeters and the Room 172 SGSAS.

## 11.0 REFERENCES

New Mexico Environment Department, Waste Isolation Pilot Plant Hazardous Waste Facility Permit (WAP), NM48901 139088-TSDF, Santa Fe, New Mexico, 1989.

*U.S. Code of Federal Regulations*, Title 40, *Protection of Environment*, Part 191, "Environmental Radiation Protection Standards for Management and Disposal of Spent Nuclear Fuel, High-Level and Transuranic Radioactive Wastes."

*U.S. Code of Federal Regulations*, Title 40, *Protection of Environment*, Part 194, "Criteria for the Certification and Re-Certification of the Waste Isolation Pilot Plant's Compliance with the 40 CFR Part 191 Disposal Regulations."

U.S. Department of Energy, "40 CFR Part 191, Compliance Certification Application for the Waste Isolation Pilot Plant," DOE/CAO 1996-2184, Carlsbad, New Mexico, 1996.

U.S. Department of Energy, "40 CFR Part 191, Subparts C and D, Compliance Recertification Application 2004," DOE/WIPP/2004-3231.

U.S. Department of Energy, "Transuranic Waste Baseline Inventory Report," Rev.0, DOE/TRU-2206-3344

U.S. Department of Energy, Carlsbad Area Field Office, "Contact-Handled Transuranic Waste Acceptance Criteria for the Waste Isolation Pilot Plant (CH-WAC)," Rev. 3, DOE/WIPP-02-3122, Carlsbad, New Mexico, April 25, 2005.

U.S. Department of Energy, Carlsbad Area Field Office, "Quality Assurance Program Description (QAPD)," DOE/CBFO-94-1012, Rev. 7, Carlsbad, New Mexico, July 2005.

U.S. Environmental Protection Agency, "Criteria for the Certification and Recertification of the Waste Isolation Pilot Plant's Compliance with the Disposal Regulations: Certification Decision; Final Rule," *Federal Register*, Vol. 63, No. 95, May 18, 1998, pp. 27354, 27405.

U.S. Environmental Protection Agency, "EPA Replicate Testing for WIPP Nondestructive Assay (NDA) Systems," Rev. 2, June 2002.

U.S. Nuclear Regulatory Commission, "Contact-Handled Transuranic Waste Authorized Methods for Payload Control" (CH-TRAMPAC).

**ATTACHMENTS A.1 THROUGH A.9**

**CHECKLISTS**

*Not printed out  
(~ 200 more pages)*