



 ENTERED
Department of Energy
Carlsbad Field Office
P. O. Box 3090
Carlsbad, New Mexico 88221
July 18, 2008



Mr. David H. Haar
Washington TRU Solutions
P.O. Box 2078
Carlsbad, NM 88220

Subject: Evaluation of the Remedial Actions for Corrective Action Report 08-025,
Los Alamos National Laboratory Central Characterization Project

Dear Mr. Haar:

The Carlsbad Field Office has reviewed the remedial actions for Corrective Action Report (CAR) 08-025. This CAR resulted from shipment of a drum with an unresolved Nonconformance Report from Los Alamos National Laboratory Central Characterization Project.

The remedial actions have been verified as complete and determined to be adequate. The results of the evaluation are included on the enclosed CAR continuation sheet.

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 18, 2008

cc: w/ enclosure

A. Holland, CBFO	*ED
M. Navarrete, CBFO	ED
D. Gadbury, CBFO	ED
N. Castaneda, CBFO	ED
C. Fesmire, CBFO	ED
D. Ploetz, WTS/CCP	ED
A. J. Fisher, WTS/CCP	ED
V. Cannon, WTS/CCP	ED
M. Walker, WTS/CCP	ED
G. Rael, LASO	ED
M. Eagle, EPA	ED
E. Feltcorn, EPA	ED
R. Joglekar, EPA	ED
S. Zappe, NMED	ED
S. Holmes, NMED	ED
T. Kesterson, DOE OB WIPP NMED	ED
D. Winters, DNFSB	ED
V. Waldram, LANL-CO	ED
P. Gilbert, LANL-CO	ED
A. Pangle, CTAC	ED
P. Y. Martinez, CTAC	ED

CBFO QA File

CBFO M&RC

*ED denotes electronic distribution

CAR CONTINUATION SHEET

1. CAR No: 08-025

2. Activity No: N/A

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Block # 17 Acceptance of Corrective Action Completion (Remedial Actions Only):

SUBJECT: VERIFICATION OF REMEDIAL ACTIONS FOR CORRECTIVE ACTION PLAN FOR CBFO CORRECTIVE ACTION REPORT 08-025, RESULTING FROM SHIPMENT OF A DRUM FROM THE LOS ALAMOS NATIONAL LABORATORY WITH AN UNRESOLVED NONCONFORMANCE REPORT

An evaluation has been performed of the completion of the remedial actions associated with CBFO CAR 08-025, which resulted from shipment of a drum from the Los Alamos National Laboratory (LANL) with an unresolved nonconformance report (NCR). Documentation supporting the completion of the remedial actions was submitted to CBFO via WTS letter (CP:08:00346 UFC 2300.00) from D.K. Ploetz to D.S. Miehls, dated July 9, 2008.

A. Remedial Actions:

1. Suspended all shipments to WIPP on June 6, 2008, until immediate corrective actions were completed.
 - The following documentation was reviewed and verified; a copy of WTS e-mail from Kyle Darrah to Retrieval, Characterization, and Transportation (RCT) personnel for notification that all waste shipments to WIPP, both CH and RH, are immediately suspended until further notice; a copy of the ORPS Operating Experience Report EM-CAFO-WTS-WIPP-2008-0005, dated 6/9/08, and a copy of CCP Corrective Action Report CAR-CCP-00008-08.
2. Performed a 100% verification of the four shipments that were en route to WIPP on June 6, 2008, or received at WIPP but not yet emplaced, to confirm that all containers certified in WWIS did not have unresolved NCRs affecting their certification.
 - The process used on the CCP Datacenter to search for drums pertaining to this action was verified by interview with the Project Compliance Manager of CCP and review of the database. Also, a review was performed of the container number list against the submitted search results. Traceability from the container numbers to the search results to any NCRs associated with these containers was also verified. A review was performed of copies of the CCP Datacenter search result printouts for verification of shipments that were en route to WIPP or received at WIPP but not yet emplaced. The shipments were SRS, INL, and INL RH shipments. The fourth shipment was an AMWTP shipment containing no CCP drums.
3. Performed a 100% verification of the containers currently certified in the WWIS, but not yet shipped, to confirm that all containers did not have unresolved NCRs affecting their certification.
 - The process used on the CCP Datacenter to search for drums pertaining to this action was verified by interview with the Project Compliance Manager of CCP and review of the database. Also, a review of the container number list against the submitted search results was performed. Traceability from the container numbers to the search results to any NCRs associated with these containers was verified. A review was performed of copies of the CCP Datacenter search result printouts for verification of containers that were currently certified in the WWIS, but not yet been shipped.

CAR CONTINUATION SHEET

1. CAR No: 08-025

2. Activity No: N/A

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4. Briefings on this event were completed, including Retrieval, Characterization, and Transportation personnel. As part of these briefings, it was emphasized that all reviews must be performed to the required rigor. The general briefing was followed by detailed briefings of affected personnel to review their roles and responsibilities, and management's expectations for performing reviews.
 - Documentation was reviewed for verification of the briefing held for RCT personnel on the LANL drum given by D. K. Ploetz, CCP Manager of RCT. Detailed briefings were performed with the SPMs and WCOs on the reviews and their roles and responsibilities, and management's expectations for performing reviews. Copies of the CCP attendance sheets were reviewed and verified against the List of Qualified Individuals for the WCOs and SPM Lot Evaluators.

5. In order to capture the content of the briefings and clarify SPM and WCO responsibilities contained in CCP procedures, the following Standing Orders (SO) were issued:
 - S.O.32 Clarification for Selection of Data at Project Office Lot Evaluation
 - S.O.33 Clarification of WCO Responsibility in Certification of Containers for Shipment to WIPP
 - S.O.34 NCR/CAR Resolution Check prior to CH Payload Assembly to WIPP
 - A review was done of CCP S.O.32, *Clarification for Selection of Data at Project Office Lot Evaluation*; S.O.33, *Clarification of WCO Responsibility in Certification of Containers for Shipment to WIPP*; and S.O.34, *NCR/CAR Resolution Check Prior to CH Payload Assembly to WIPP*. The SOs provide supplemental direction in order to capture the content of the above briefings and clarify SPM and WCO responsibilities contained in the CCP procedures.

6. Suspended manual searches of the CCP Data Center for the purpose of generating Lot Candidate Lists until controls are developed and implemented.
 - Verification that an e-mail from Mark Percy to staff on suspended manual searches for the purpose of generating Lot Candidate List was distributed. This e-mail was for LANL waste streams LA-MIN03-NC.001 and LA-CIN02.001. These are the only two waste streams subject to manual searches.

7. Placed all containers at LANL with unresolved NCRs into a hold lot preventing their certification in WWIS as an interim control measure until each container with an unresolved NCR can be checked to verify that it is still tagged with a CCP Hold Tag. If the tag is damaged or missing, it will be replaced and affixed with a wire tie.
 - Verified the process used in the CCP Datacenter to search for unresolved NCRs. Drums are placed in Lot ID when an open NCR is present. These drums will not be allowed to populate to a candidate list for shipment. This keeps the drums from being certifiable. Random container numbers were put into the CCP Datacenter to verify this process. Copies of the CCP Datacenter search printouts for all LANL containers with unresolved NCRs placed in a hold lot, preventing their certification in WWIS. This is an interim control measure until each container with an unresolved NCR can be checked to verify that it is still tagged with a CCP Hold Tag.

CAR CONTINUATION SHEET

1. CAR No: 08-025

2. Activity No: N/A

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8. Adopted the use of a wire tie to attach CCP Hold Tags to containers.

- Verified an example of the wire tie used to attach the CCP Hold Tags to the containers. A copy of CCP Lessons Learned 2008-12 was submitted for properly tagging nonconforming drums. Use of wire ties at LANL was verified by Wayne Ledford on June 25, 2008.

Based on the detail review, it has been determined that the remedial actions of the CAR have been implemented. It is recommended that the remedial actions only of CBFO CAR 08-025 be approved.

Priscilla Y. Masten / Wayne Ledford

Response Evaluated by

7-17-08
Date