

United States Government

Department of Energy

memorandum

Carlsbad Field Office
Carlsbad, New Mexico 88221

DATE: August 11, 2008

REPLY TO
ATTN OF: CBFO:QA:MPN:KBS:08-1330:UFC 2300.00

SUBJECT: Verification of the Corrective Actions and Closure of Corrective Action Reports 08-031 and 08-032 , Audit A-08-18, Hanford TRU Program

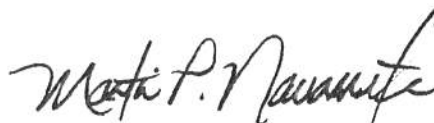
REFERENCE:: Fluor Hanford Letter FH-0801807, dated July 31, 2008, "Closure Documentation for Corrective Action Reports CAR 08-031 and 08-032 From Recertification Audit A-08-18, Hanford TRU Program"

to: Larry D. Romine, DOE-RL

The results of the Carlsbad Field Office (CBFO) verification and evaluation of the documentation supporting the corrective actions associated with CBFO Corrective Action Reports (CARs) 08-031 and 08-032 are included on the attached CAR continuation sheets. These CARs resulted from CBFO Audit A-08-18 of the Hanford TRU Program.

Based on the evaluation of the documentation provided, it has been determined that the corrective actions have been completed. Accordingly, these CARs are considered closed.

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



Martin P. Navarrete
Senior Quality Assurance Specialist

Enclosures

080817



Larry Romine

-2-

August 11, 2008

cc: w/enclosure

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WIPP Operating Record, MS: 452-09

CBFO QA File

CBFO M&RC

*ED denotes electronic distribution



CAR CONTINUATION SHEET

1. CAR No: 08-031

2. Activity No: A-08-18

3. Page 1 of 1

Block # 17 Verification of Corrective Action Completion

The following is an evaluation of the Hanford TRU Program closure documentation and supporting objective evidence for CBFO CAR 08-031 submitted via Fluor Hanford letter dated July 31, 2008 (letter number FH-0801807), from Richard P. Dunn to M. Navarrete. The review of the objective evidence of completion for each of the agreed-upon corrective actions is documented as follows.

Remedial Actions:

Item #1) *Link container RH-A-88-023(CAR 08-031) with Hanford CAR TRU-SPO-08CAR-017. Note: Linking the container to the CAR essentially puts the container "on-hold" until all issues are resolved and the CAR is closed.*

Closure documentation reviewed: Fluor Hanford letter FH-0801807, Attachment 1, Objective evidence that the CBFO CAR and the Hanford CAR have been linked together in the Hanford Electronic Data Management Tool (EDMT) to ensure resolution of the CARs prior to releasing the subject container for shipment. Fluor Hanford letter FH-0801807, Attachment 10, Closed copy of Hanford CAR TRU-SPO-08CAR-017

Item #2) *Issue a new NCR to re-evaluate the Use-As-Is disposition of the drum based on a review of available AK for both parent containers.*

Closure documentation reviewed: Fluor Hanford letter, FH-0801807, Attachment 2, NCR #TRU-SPO-08NCR-134, issued to address review of the Use-As-Is disposition for container RH-A-88-023 and Memo from Janet Decker to Shawn Swanson, forwarded from Shawn Swanson back to Janet Decker, dated July 10, 2008, identifying the drum as being placed "on-hold."

Investigative Action:

Document review of NCRs for similar conditions, i.e., other containers in inventory with Use-As-Is disposition and that document the mixing of waste streams.

Closure documentation reviewed: Fluor Hanford letter FH-0801807, Attachment 3, Memo from Scott Bisping to Kent McDonald, dated July 21, 2008, summarizing the evaluation of NCR against containers with a Use-As-Is disposition and related to the subject waste stream and concluding that the particular situation was an isolated case, including a listing of the subject containers and the EDMT history data for each NCR/container. Memo from Janet Decker to Richard Dunn forwarded to John Lukes forwarded to Corrective Action Management, dated July 28, 2008, indicating agreement that investigative action is completed.

Actions to Preclude Recurrence:

Item #1) *Prepare an internal lessons learned on set-up factors for this condition.*

Closure documentation reviewed: Fluor Hanford letter FH-0801807, Attachment 4, Lessons Learned document, TRU-SPO-08CAR-017, Action 4, Lessons Learned

Item #2) *Disseminate lessons learned through a briefing to AK personnel, QA personnel, the WCO and SPMs.*

Closure documentation reviewed: Fluor Hanford letter FH-0801807, Attachment 5, Attendance roster for subject Lessons Learned briefing, dated July 21, 2008. Memo from Kent McDonald to Scott Bisping and Sheila Hailey, WCO, forwarded to Kent McDonald, forwarded to Janet Decker ensuring completion of Lessons Learned briefing. Memo from Janet Decker to Richard Dunn forwarded back to Janet Decker then forwarded to John Lukes and forwarded to Corrective Action Management, dated July 22, 2008, group concurrence that corrective action is closed.

Based on the detailed review of the Hanford TRU Program closure package and the objective evidence submitted for each action, it is recommended that CAR 08-031 be closed.

Verification performed by:


Porf Martinez

8/7/08
Date

CAR CONTINUATION SHEET

1. CAR No: 08-032

2. Activity No: A-08-18

3. Page 1 of 1.

Block # 17 Verification of Corrective Action Completion:

The following is an evaluation of the Hanford TRU Program closure documentation and supporting objective evidence for CBFO CAR.08-032 submitted via Fluor Hanford letter dated July 31, 2008 (letter number FH-0801807), from Richard P. Dunn to M. Navarrete. The review of the objective evidence of completion for each of the agreed-upon corrective actions is documented as follows.

Remedial Actions:

Link container 0013137 (CAR 08-032) with Hanford CAR TRU-SPO-08CAR-018. Note: Linking the container to the CAR essentially puts the container "on-hold" until all issues are resolved and the CAR is closed.

Closure documentation reviewed: Fluor Hanford letter FH-0801807, Attachment 6, Objective evidence that the CBFO CAR and the Hanford CAR have been linked together in the Hanford Electronic Data Management Tool (EDMT) to ensure resolution of the CARs prior to releasing the subject container for shipment. Fluor Hanford letter FH-0801807, Attachment 10, Closed copy of Hanford CAR TRU-SPO-08CAR-018

Investigative Actions:

Item #1) *Obtain an independent NDE review by a Level III radiographer by performing a repeat x-ray inspection of the box.*

Closure documentation reviewed: Fluor Hanford letter FH-0801807, Attachment 7, Memo from John Keve to Richard Dunn, dated July 9, 2008, confirming completion of the independent repeat of an x-ray of the container stating that, in the opinion of the Level III, the impenetrable portion of the container does not mask additional liquids or prohibited items.

Item #2) *Schedule a full WIPP re-NDE of the box to provide comprehensive audio narrative and attendant BDR. A copy of the re-examination is provided on video cassette (RTR-Addendum #1)*


Closure documentation reviewed: Fluor Hanford letter FH-0801807, Attachment 8, Memo from Jeff Van Meighem to Frank Cogswell forwarded back to Jeff VanMeighem, dated July 21, 2008, scheduling container 0013137 for the WIPP re-NDE. Memo from Janet Decker to Richard Dunn, forwarded back to Janet Decker and forwarded to John Lukes, then forwarded to Corrective Action Management, dated July 22, 2008, group concurrence that the completion of the re-NDE will complete the investigative action. Video tape of the re-NDE and associated RTR data sheet generated during the full WIPP re-NDE of container 0013137 (RTR performed by Aaron Anderson).

Actions to Preclude Recurrence:

Brief radiographers on the event and the importance of comprehensively recording the details of their decision-making process during x-ray examinations.

Closure documentation reviewed: Fluor Hanford letter FH-0801807, Attachment 9, Copy of the "Talking Points" for the briefing of the radiographers. Copy of the radiographer briefing recorded on a "Course Completion Roster," dated July 15, 2008, providing objective evidence of completion. Memo from Janet Decker to Richard Dunn, forwarded to John Lukes, forwarded to Corrective Action Management, dated July 23, 2008, group concurrence that action to preclude recurrence is completed.

Based on the detailed review of the Hanford TRU Program closure package and the objective evidence submitted for each action, it is recommended that CAR 08-032 be closed.

Verification performed by: 
Porf Martinez

8/7/08
Date