DATE: August 15, 2008

REPLY TO ATTN OF: CBFO:QA:MPN:KBS:08-1333:UFC 2300.00

SUBJECT: Verification of the Corrective Actions and Closure of Corrective Action Report 08-033, 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 Report (CAR) 08-033 is 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, this CAR is 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

Enclosure
cc: w/enclosure
A. Holland, CBFO
N. Castaneda, CBFO
D. Gadbury, CBFO
C. Fesmire, CBFO
R. Dunn, Hanford
S. Huggins, Hanford
K. McDonald, Hanford
S. Hailey, Hanford
E. Greager, Hanford
M. Eagle, EPA
E. Feltcorn, EPA
R. Joglekar, EPA
S. Ghose, EPA
S. Zappe, NMED
S. Holmes, NMED
T. Kesterson, DOE OB WIPP NMED
D. Winters, DNFSB
P. Gilbert, LANL-CO
G. Lyshik, LANL-CO
A. Pangle, CTAC
S. Calvert, CTAC
WIPP Operating Record, MS: 452-09
CBFO QA File
CBFO M&RC
*ED denote electronic distribution
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 08-033 submitted via Fluor Hanford letter dated August 6, 2008 (letter number FH-0801916), 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) Remove QA personnel from the list of those qualified as Project Data Validators.
Closure documentation reviewed: Fluor Hanford letter FH-0801916, Attachment 1, Memo from Debbie Thomas to Stewart Huggins, Robert Elkins and Clark McNaughton, dated July 1, 2008, informing them they had been removed from the list of Project Data Validators. Memo from Debbie Thomas to Kent McDonald, Richard Dunn, Janet Decker, Stewart Huggins and Michael Horhota, dated July 7, 2008, providing a list of personnel who are qualified to perform “Project Data Validator” activities showing the QA personnel deleted.
Item #2) Cease BDR validation activities being performed by QA Organization.
Closure documentation reviewed: Fluor Hanford letter, FH-0801916, Attachment 2, Memo from Stewart Huggins (QA Mgr.) to Richard Dunn, Kent McDonald, Jeffrey Edwards, Clark McNaughton, Jeff VanMeighem and Michelle Toews, dated June 23, 2008, stating that QA personnel would no longer review and approve BDRs for the SPM. A copy of this memo was forwarded from Clark McNaughton to Stewart Huggins on July 2, 2008, to verify concurrence and later forwarded from Stewart Huggins to Janet Decker, dated July 2, 2008, with guidance to hold for objective evidence for CBFO CAR Closure.

Investigative Action:
Perform an Extent of Condition review for other areas where QA personnel are assigned SPM duties.
Closure documentation reviewed: Fluor Hanford letter FH-0801916, Attachment 3, Memo from Kent McDonald to Rick Dunn, dated August 8, 2008, reporting completion of a review, including interviews, with QA Managers stating they had not been performing SPM duties. In addition, stating that a review of training records for each of the QA personnel indicate that none of the QA personnel were listed as qualified to perform other than QA duties. Personal training system print-outs for S. Huggins, C. McNaughton and M. Horhota.

Actions to Preclude Recurrence:
Brief TRU line management and QA management on the importance of maintaining QA organizational independence.
Closure documentation reviewed: Fluor Hanford letter FH-0801916, Attachment 4, FH Corrective Action Management Meeting Attendance Roster providing objective evidence that Hanford TRU Program management had attended a briefing on the importance of QA independence as described in the CBFO QAPD and the Hanford TRU Program QAPjP. Fluor Hanford letter FH-0801916, Attachment 5, and a Closed copy of Hanford CAR TRU-SPO-08CAR-020 generated as a result of CBFO CAR 08-033, which signifies closure of all action items.

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 08-033 be closed.

Verification performed by: A. Earl Bradford
Date 8/17/2008