Mr. Jon E. Hoff, Quality Assurance Manager  
Washington TRU Solutions  
P.O. Box 2078  
Carlsbad, NM 88221-2078

Subject: Corrective Action Report 08-038, Surveillance S-08-14,  
Washington TRU Solutions National Emissions Standard for  
Hazardous Air Pollutants

Dear Mr. Hoff:

The Carlsbad Field Office (CBFO) conducted Surveillance S-08-14 of Washington  
TRU Solutions National Emissions Standard for Hazardous Air Pollutants (NESHAP)  
activities August 19 through 21, 2008.

The surveillance team identified one condition adverse to quality. The enclosed  
Corrective Action Report (CAR) 08-038 was issued to address this condition  
adverse to quality.

If you have any questions or comments concerning the CAR, please contact me at  
(575) 234-7442.

Sincerely,

M. Lea Chism  
Quality Assurance Specialist

Enclosure
cc: w/enclosure
A. Holland, CBFO
G. Basabilvazo, CBFO
F. Sharif, WTS
M. A. Mullins, WTS
M. Eagle, EPA
E. Feltcorn, EPA
R. Joglekar, EPA
S. Zappe, NMED
S. Holmes, NMED
T. Kesterson, DOE OB WIPP NMED
D. Winters, DNFSB
A. Pangle, CTAC
G. Galloway, WTS
Thomas Putnam, CTAC
WIPP Operating Record, MS 452-09
CBFO QA File
CBFO M&RC
*ED denotes electronic distribution
CORRECTIVE ACTION REPORT

1. CAR No.: 08-038
2. Activity Report No.: S-08-014

4. Controlling document: WP 12-HP3500
5. CBFO Assessment Team Leader: Lea Chism

6. Responsible organization: WTS
7. CAQ was discussed with: Glen Galloway

Document that was violated: WP 12-HP3500, revision 14, section 3.1.3, bullets 3, 4, 5, and 10 require information to be recorded on Attachment 1 in whole numbers only, for the gross count rate in cpm, background count rate in cpm, net count rate in cpm, and activity in disintegrations per minute (dpm) for radiation measured (α and/or β).

9. Condition Adverse to Quality (CAQ): Review of Attachment 1, dated 8-3-08, revealed that the information had been recorded out to two (2) decimal points. The equipment used to make calculations records the information out to two decimal points and it had been recorded that way on Attachment 1. Additional samples collected showed the same deficiency, and a discussion with the supervisor indicated this was the way the information was normally recorded.

10. Suggested actions (Optional):

11a. Significant CAQ? Yes ☐ No ☒
11b. Work Suspension recommended? Yes ☐ No ☒
11c. RCRA related? Yes ☐ No ☒
11d. Accelerated corrective action required? Yes ☐ No ☒
11e. Does this CAQ affect waste streams BNINW216 or BNIN218? Yes ☐ No ☒

12. Type of actions required:
   Remedial? Yes ☒ No ☐
   Investigative? Yes ☐ No ☒
   Root Cause Analysis? Yes ☐ No ☒
   Actions to Preclude Recurrence? Yes ☒ No ☐

13a. Trend Code: WP05
13b. CAR Initiator: Thomas Putnam/Jim Oliver
     (printed name)
     Date: 8/25/08

14a. Response due date: 09-26-08
14b. Required corrective action completion date: N/A

15. Concurrence:
   a. Assessment Team Leader: [Signature]
      (printed name) Lea Chism
      Date: 08-28-08
   b. CBFO Quality Assurance Manager (if applicable): N/A
      (printed name)
      Date: N/A

16. Acceptance of Proposed Corrective Actions:
     (printed name)
     Date:

17. Acceptance of Corrective Action Completion:
     (printed name)
     Date:

18. Closure:
     (printed name)
     Date:
| 1. CAR No: 08-038 | 2. Activity No: S-08-14 | 3. Page 2 of 2 |
INSTRUCTIONS FOR COMPLETING A CORRECTIVE ACTION PLAN IN RESPONSE TO A CAR ADDRESSING A CONDITION ADVERSE TO QUALITY

You are requested to provide a corrective action plan in response to this corrective action report (CAR) by the due date identified in block 14a of the CAR. If this date cannot be met, provide a written request for extension to the assessment team leader (CAR block 5). This request must include justification for the delay and must be provided prior to the response due date (CAR block 14a).

The corrective action plan shall address the corrective actions indicated in CAR block 12. As appropriate, develop the plan in accordance with the following sequence and format:

In order to develop the corrective action plan, perform an investigative action to determine the extent and impact of the deficiency and to identify the root cause. Next, determine the actions required to correct the adverse condition. The plan shall include the following information, as appropriate to CAR block 12.

1. Corrective action response for CAR # 08-038
   A. **Remedial Actions**—Describe actions required or taken to correct the specific conditions noted and any similar conditions identified during the investigations.
   B. **Investigative Actions**—Describe the investigative actions performed to determine the extent and impact of the deficiency and the results of the investigation. This will include a determination of the acceptability of any data generated prior to resolution of the deficiency.
   C. **Root Cause Determination**—Identify the root cause of the condition as determined through investigative actions.
   D. **Actions to Preclude Recurrence**—Identify the corrective actions required to address the root cause of the condition in order to preclude recurrence.

2. For each action above, identify the individual assigned responsibility for completion of the action and the anticipated (or actual, if complete) completion date.

3. The response must identify the individual having the overall responsibility for completion of the corrective actions.

**NOTE:** The documentation to support corrective action completion is not to be submitted with the corrective action plan and shall not be submitted until the corrective action plan is approved.