

United States Government

Department of Energy

# memorandum

 Carlsbad Field Office  
 Carlsbad, New Mexico 88221

DATE: September 3, 2008

 REPLY TO  
 ATTN OF: CBFO:QA:MPN:KBS:08-1358:UFC 2300.00

 SUBJECT: Verification of the Corrective Actions and Closure of Corrective Action Report 08-035,  
 Audit A-08-18

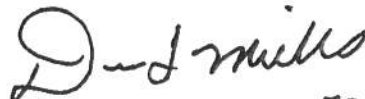
 REFERENCE: Fluor Hanford Letter FH-0802138, dated August 28, 2008, "Closure Documentation for  
 Corrective Action Report CAR 08-035 From Recertification Audit A-08-18, Hanford TRU  
 Program"

to: Mr. Larry D. Romine, DOE-RL

The Carlsbad Field Office performed an evaluation of the documentation supporting closure of the corrective actions identified in Corrective Action Report (CAR) 08-035. This CAR was identified during CBFO Recertification Audit A-08-18, Hanford TRU Program.

Evaluation of the documentation supporting closure of the corrective actions is documented on the attached CAR continuation sheet. The corrective actions have been verified and determined to be satisfactory. Based on this determination, the CAR is closed.

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


  
 FOR

Martin P. Navarrete  
 Senior Quality Assurance Specialist

Enclosures

080911




Mr. Larry D. Romine

-2-

September 3, 2008

cc w/enclosure



|                                |     |
|--------------------------------|-----|
| A. Holland, CBFO               | *ED |
| N. Castaneda, CBFO             | ED  |
| D. Gadbury, CBFO               | ED  |
| C. Fesmire, CBFO               | ED  |
| R. Dunn, Hanford               | ED  |
| S. Huggins, Hanford            | ED  |
| K. McDonald, Hanford           | ED  |
| S. Hailey, Hanford             | ED  |
| E. Greager, Hanford            | ED  |
| M. Eagle, EPA                  | ED  |
| E. Feltcorn, EPA               | ED  |
| R. Joglekar, EPA               | ED  |
| S. Ghose, EPA                  | ED  |
| S. Zappe, NMED                 | ED  |
| S. Holmes, NMED                | ED  |
| T. Kesterson, DOE OB WIPP NMED | ED  |
| D. Winters, DNFSB              | ED  |
| P. Gilbert, LANL-CO            | ED  |
| G. Lyshik, LANL-CO             | ED  |
| A. Pangle, CTAC                | ED  |
| E. Bradford, CTAC              | ED  |
| B. Pace, CTAC                  | ED  |

WIPP Operating Record, MS: 486-06

CBFO QA File

CBFO M&RC

\*ED denotes electronic distribution

## CAR CONTINUATION SHEET

1. CAR No: 08-035

2. Activity No: A-08-18

3. Page 1 of 3

**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 08-035 submitted via Fluor Hanford letter dated August 28, 2008 (letter number FH-0802138), 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) Revise WMP-400, Section 1.2.2, to properly capture the training requirements for all VE personnel.

Closure documentation reviewed:

Fluor Hanford letter FH-0802138, Attachment 1: Memo from M. Dickert to Distribution, dated August 10, 2008, signifying issuance of the up-dated training procedure (WMP-400, Section 1.2.2). Web Page print-out showing the procedure placed on the Hanford Web Page. Copies of the corrected portions of Procedure WMP-400, Section 1.2.2, Revision 23, effective date 08/20/2008.

Item #2) Revise/develop implementing administrative documents (including VE Personnel re-qualification card and administrative tracking of expiration dates for qualified VE Personnel).

Closure documentation reviewed:

Fluor Hanford letter, FH-0802138, Attachment 2: Newly developed and approved "TRU VE Personnel Re-qualification Card". Memo from D. Thomas to J. Decker, dated August 25, 2008, addressing completion of the re-qualification card and excerpts from the Hanford TRU Training Tracking System (TTTS) showing that VE personnel who have not completed the new re-qualification card are not currently qualified until they complete the new training process, and a copy of excerpts from the TTTS identifying the new administrative control of the re-qualification process.

Item #3) There are currently no VE Operations being performed at the Hanford site. Further VE operations will be performed only with VE Personnel who have been re-qualified under the revised program.

Closure documentation reviewed:

Fluor Hanford letter, FH-0802138, Attachment 3: Memo from R. Dunn to J. Decker and K. McDonald, dated July 30, 2008, mandating re-qualification of all VE personnel prior to performance of VE.

**Investigative Action:**

For all waste with completed Visual Examination, evaluate the VE and VET Batch Data Reports approved since August 17, 2005, and confirm that all personnel who performed visual examination were qualified. Note: Any discrepancies will be documented via NCR.

Additional Notes: If new NCRs are generated as a result of the review, the NCR numbers will be provided and an evaluation of data usability will be performed. If as a result of the investigative action, it is found that non-compliant waste has been shipped and/or disposed of at WIPP, Fluor Hanford will notify the CBFO National TRU Program.

## CAR CONTINUATION SHEET

1. CAR No: 08-035

2. Activity No: A-08-18

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Closure documentation reviewed:

Fluor Hanford letter, FH-0802138, Attachment 4, Part #1: Memo from K. McDonald to R. Dunn addressing the review of all VE BDRs processed since August 17, 2005. (The memo addresses the fact that a number of containers were processed by VE personnel who did not have a re-qualification letter on file and identifies the NCR that was issued to track the containers.) Hanford NCR TRU-SPO-08-NCR-159 and attached list of containers that were processed by VE personnel who did not have a re-qualification letter on file, indicating they had not been re-qualified within the two-year timeframe. (The NCR has been dispositioned to accept the BDRs based on the fact that the VE operators and VEE personnel had maintained qualifications during the time frame even though the re-qualification letter was not on file.) The list of all the BDRs reviewed that had been processed since August 17, 2005.

Fluor Hanford letter, FH-0802138, Attachment 4, Part #2: Memo from K. McDonald to R. Dunn, stating that he had reviewed all VET BDRs related to processing waste stream RLKEBASIN01 (S3000 NLOP) and that at no time had the VE personnel qualifications lapsed. The list of all BDRs processed from waste stream RLKEBASIN01 (S3000 NLOP) since August 17, 2005.

**Actions to Preclude Recurrence:**

Item #5) Revise WMP-400, Section 3.1.1, Management Assessment, to require performance of a validation assessment following a Class 3 Modification to the Waste Analysis Plan of the WIPP Hazardous Waste Facility Permit.

Closure documentation reviewed:

Fluor Hanford letter, FH-0802138, Attachment 5: Excerpts from the newly revised WMP-400, Section 3.1.1, TRU Management Assessments, Revision 6, effective date 7/31/08, showing the addition of the requirement to include process evaluations after WIPP Class 3 permit modifications are issued.

Item #6) Brief SPO direct reports to reinforce the policy that all changes made to procedures that affect or potentially affect data quality, or that directly implement Permit requirements, must be reviewed and approved by CBFO.

Closure documentation reviewed:

Fluor Hanford letter, FH-0802138, Attachment 6: Excerpts from Permit Attachment B5 (B5-2) and the WAC Appendix A (A.1) (requirements for notification of CBFO when changes to implementing documents can affect performance criteria or data quality) that were used to brief Hanford SPO personnel. Attendance roster for briefing of SPO direct report personnel.

Item #7) Revise Procedure Minimum Review Matrix to add appropriate requirement for CBFO review of WMP-400, 1.2.2 for changes that directly or indirectly affect data quality.

Closure documentation reviewed:

Fluor Hanford letter, FH-0802138, Attachment 7: Memo from M. Dickert to K. McDonald, dated August 25, 2008, Objective evidence of issuance of the revised TRU Document Minimum Review/Approval Distribution List," and the attached document identifying documents requiring CBFO approval of changes.

## CAR CONTINUATION SHEET

1. CAR No: 08-035

2. Activity No: A-08-18

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Item #8) Re-evaluate procedures that may affect data quality and are sent to Carlsbad for independent review to determine if additional changes are appropriate.

Closure documentation reviewed:

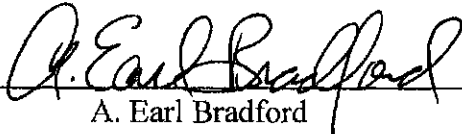
Fluor Hanford letter, FH-0802138, Attachment 7: Memo from K. McDonald to R. Dunn, dated August 25, 2008, Objective evidence of completing the review of the TRU Document Minimum Review/Approval Distribution List," to ensure that all program procedures that need to be considered data quality effecting and therefore require CBFO approval of changes.

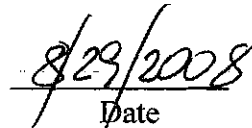
Additional documentation reviewed:

Fluor Hanford letter, FH-0802138, Attachment 8: Reviewed a copy of the closed Hanford CAR TRU-SPO-08CAR-019. This CAR was generated to provide tracking of all action items addressed in CBFO CAR 08-035 and the CBFO approved Corrective Action Plan. The completed and closed CAR 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 08-035 be closed.

Verification performed by:

  
A. Earl Bradford

  
Date