



Department of Energy

Carlsbad Field Office
P. O. Box 3090
Carlsbad, New Mexico 88221

November 21, 2008

 ENTERED



Mr. D. K. Ploetz, Manager
Central Characterization Project
Washington TRU Solutions, LLC
P.O. Box 2078
Carlsbad, NM 88221-2078

Subject: Evaluation of the Corrective Action Plans for Corrective Action Reports 09-004 and 09-005, Audit A-09-01, Savannah River Site Central Characterization Project

Dear Mr. Ploetz:

The Carlsbad Field Office (CBFO) performed an evaluation of the corrective action plans (CAPs) developed to address and correct the conditions identified in CBFO Corrective Action Reports (CARs) 09-004 and 09-005. These CARs were identified during CBFO Recertification Audit A-09-01, Savannah River Site Central Characterization Project.

The evaluation of the proposed corrective action for CAR 09-004 is documented on the enclosed CAR continuation sheet and indicates the CAP does not adequately address the condition noted in the CAR. A revised CAP is requested by December 5, 2008.

The evaluation of the proposed corrective action for CAR 09-005 is documented on the enclosed CAR continuation sheet and indicates the CAP is acceptable. Please provide evidence of completion of the associated corrective actions for CAR 09-005 in accordance with the completion date noted in the CAP.

If you have any questions or comments, please contact me at (575) 234-7491.

Sincerely,

Dennis S. Miehl
Acting Quality Assurance Manager

Enclosure




Mr. D. K. Ploetz

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November 21, 2008

cc: w/enclosure



A. Holland, CBFO	*ED
D. Miehls, CBFO	ED
M. Navarrete, CBFO	ED
N. Castaneda, CBFO	ED
D. Gadbury, CBFO	ED
C. Fesmire, CBFO	ED
H. Crapse, DOE-SR	ED
D. Haar, WTS/CCP	ED
V. Cannon, WTS/CCP	ED
A. J. Fisher, WTS/CCP	ED
M. Walker, WTS/CCP	ED
M. Percy, WTS/CCP	ED
C. Simmons, WTS/CCP	ED
C. Turner, WTS/CCP	ED
J. Hoff, WTS	ED
M. A. Mullins, WTS	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
P. Gomez, CTAC	ED
C. Riggs, CTAC	ED
A. Pangle, CTAC	ED
B. Pace, CTAC	ED

RCRA Operating Record, MS: 452-09

CBFO QA File

CBFO M&RC

*ED denotes electronic distribution

CAR CONTINUATION SHEET

1. CAR No: 09-004	2. Activity No: A-09-01	3. Page <u>1</u> of <u>1</u> .
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Block # 16 Acceptance of Proposed Corrective Actions:

An evaluation was performed of the proposed action detailed in the CCP corrective action plan (CAP) developed in response to CBFO Corrective Action Report (CAR) 09-004, which was identified during CBFO Audit A-09-01, SRS/CCP Recertification. The CAP was submitted via CCP memorandum CP:08:00529, dated November 18, 2008, from Mr. D. K. Ploetz, Manager, to Mr. D. S. Miehl, Quality Assurance Specialist, Carlsbad Field Office (CBFO).

CAR 09-004 noted a deficiency with the requirements of CCP-PO-001, *CCP TRU Waste Characterization Quality Assurance Project Plan*, regarding the statement, "For ...direct canister systems, field QC samples are collected and analyzed on a ...sampling batch basis." Three field reference standards were collected and assigned batch data report number SRHSGS080001. The requirement states that field QC samples must also be collected; however, this was not done.

Although the CAP adequately addresses the remedial action taken, investigative actions, and root cause, the actions taken to prevent (preclude) recurrence have been determined to be inadequate. Therefore, it is recommended that the CAP be revised and submitted by December 5, 2008, to appropriately identify actions to preclude recurrence that align with an approved revision of CCP sample collection procedure CCP-TP-093, *CCP Sampling of TRU Waste Containers*. A "freeze file" of this procedure is inadequate.

Also note, that in section 2 of the submitted CAP, Investigative Actions, Impact, the BDR for LANL is misidentified. Make the appropriate correction in the next CAP.



 Evaluation Performed By: Paul C. Gomez

CAR CONTINUATION SHEET

1. CAR No: 09-005	2. Activity No: A-09-01	3. Page <u>1</u> of <u>1</u> .
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Block # 16 Acceptance of Proposed Corrective Actions:

An evaluation was performed of the proposed actions detailed in the Washington TRU Solutions (WTS) Central Characterization Project (CCP) corrective action plan (CAP) developed in response to CBFO Corrective Action Report (CAR) 09-005, which was identified during CBFO Audit A-09-01, Recertification of CCP at the Savannah River Site (SRS). The CAP was submitted via WTS/CCP memorandum CP:08:00529, dated November 18, 2008, from Mr. D. K. Ploetz, Manager of CCP Retrieval, Characterization and Transportation, to Mr. D. S. Miehl, Acting Quality Assurance Manager, Carlsbad Field Office (CBFO).

The results of the evaluation have determined that the remedial actions, investigative actions, root cause, and action to preclude recurrence are acceptable. Therefore, it is recommended that the CAP for CAR 09-005 be approved.



11/20/08

Evaluation Performed By: Berry D. Pace

Date