



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

June 28, 2010



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

Subject: Review and Verification of the Corrective Actions Submitted in Response to CBFO CAR 10-029, Audit A-10-14, LANL/CCP Characterization Activities

Dear Mr. Ploetz:

Enclosed are the results of the Carlsbad Field Office (CBFO) review and verification of the corrective actions submitted in response to CBFO Corrective Action Report (CAR) 10-029, which resulted from CBFO Audit A-10-14 of the Los Alamos National Laboratory/Central Characterization Project (LANL/CCP) characterization activities. The results of the verification are documented on the enclosed CAR Continuation Sheets, which indicate that the associated corrective actions have been fulfilled and are satisfactorily implemented. Subsequently, CAR 10-029 is considered closed.

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

Sincerely,

Dennis S. Miehl
 Senior Quality Assurance Specialist

Enclosure

cc: w/enclosure

A. Holland, CBFO	*ED	R. Joglekar, EPA	ED
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J. Hoff, WTS	ED	A. Pangle, CTAC	ED
M. Mullins, WTS	ED	G. White, CTAC	ED
G. Rael, LASO	ED	P. Gomez, CTAC	ED
L. Bishop, LASO	ED	WIPP Operating Record	ED
T. Peake, EPA	ED	CBFO QA File	
M. Eagle, EPA	ED	CBFO M&RC	
E. Feltcorn, EPA	ED	*ED denotes electronic distribution	



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Block # 17: Acceptance of Corrective Action Completion:

CBFO has performed an evaluation of the evidence supporting completion of the corrective actions associated with CBFO Corrective Action Report (CAR) 10-029 identified during CBFO Audit A-10-14. The evidence was submitted via URS memorandum CP:10:01370, dated June 7, 2010, from Mr. D. K. Ploetz, Manager, Central Characterization Project Retrieval, Characterization and Transportation, to Mr. Dennis S. Miehl, Senior Quality Assurance Specialist, Carlsbad Field Office. The methods used to verify completion of the actions contained in the approved corrective action plan (CAP) are described below. *Italicized text taken verbatim from the CAP is used to show the correlation between the corrective action and the method used for verification.*

CAR 10-029 identified one condition adverse to quality: Headspace Gas Sampling BDR Quarterly Re-reviews were not conducted for the third and fourth quarters of 2009. The CCP was required to address Remedial Actions, Investigative Actions, Root Cause, and Actions to Preclude Recurrence.

Remedial Actions:

1. *CCP has determined that the following remedial actions are appropriate for the CAR condition:*
 - *The Site Project Manager (SPM) responsible for LANL has initiated Headspace Gas Sampling BDR Quarterly re-reviews or has completed re-reviews for the second, third, and fourth quarters of 2009*
 - *The SPM responsible for INL has initiated Headspace Gas Sampling BDR Quarterly re-reviews for the first quarter of 2009*
 - *The SPM responsible for ORNL has initiated Headspace Gas Sampling BDR Quarterly re-reviews for second and third quarters of 2009*
 - *The SPM responsible for SRS has initiated Headspace Gas BDR Quarterly re-reviews for the third and fourth quarters of 2009*
 - *The SPM responsible for GEVNC has initiated Headspace Gas Sampling BDR Quarterly re-review for the third quarter of 2009*
 - *The Headspace Gas BDR date has been defined as the date the Independent Technical Reviewer (ITR) signs off on the ITR Checklist of the BDR.*

Verification (Completion Documentation):

1. Verified CCP Closure Package for CBFO CAR 10-029 (Action 1) "Headspace Gas Quarterly Repeats: Letters Confirming that Each of the Repeat Reviews has been Completed and that No Discrepancies were Identified"

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a) Verified CCP-LANL letter CP:09:01296 UFC:5900.00 INTER-OFFICE CORRESPONDENCE, dated July 21, 2009, SUBJECT: RESULTS OF SECOND QUARTER 2009 (APRIL 1, 2009 THROUGH JUNE 30, 2009) HEADSPACE GAS SAMPLING AND ANALYSIS AND SOLID SAMPLING AND ANALYSIS QUARTERLY REPEAT DATA GENERATION LEVEL DATA REVIEW AT THE LOS ALAMOS NATIONAL LABORATORY

Verified CCP-LANL letter CP:10:01263 UFC:5900.00 INTER-OFFICE CORRESPONDENCE, dated May 4, 2010, SUBJECT: RESULTS OF THIRD QUARTER 2009 (JULY 1, 2009 THROUGH SEPTEMBER 30, 2009) HEADSPACE GAS SAMPLING QUARTERLY REPEAT DATA GENERATION LEVEL DATA REVIEW AT THE LOS ALAMOS NATIONAL LABORATORY

Verified CCP-LANL letter CP:10:01354 UFC:5900.00 INTER-OFFICE CORRESPONDENCE, dated June 3, 2010, SUBJECT: RESULTS OF FOURTH QUARTER 2009 (OCTOBER 1, 2009 THROUGH DECEMBER 31, 2009) HEADSPACE GAS SAMPLING QUARTERLY REPEAT DATA GENERATION LEVEL DATA REVIEW AT THE LOS ALAMOS NATIONAL LABORATORY

b) Verified CCP-INL letter CP:10:01361 UFC:5900.00 INTER-OFFICE CORRESPONDENCE, dated June 4, 2010, SUBJECT: RESULTS OF HEADSPACE GAS SAMPLING QUARTERLY REPEAT DATA GENERATION LEVEL DATA REVIEW: IDAHO NATIONAL LABORATORY FIRST CALENDAR QUARTER OF 2009

c) Verified CCP-ORNL letter CP:10:01339 UFC:5900.00 INTER-OFFICE CORRESPONDENCE, dated May 27, 2010, SUBJECT: RESULTS OF HEADSPACE GAS SAMPLING QUARTERLY REPEAT DATA GENERATION LEVEL DATA REVIEW: OAK RIDGE NATIONAL LABORATORY SECOND QUARTER OF 2009

Verified CCP-ORNL letter CP:10:01340 UFC:5900.00 INTER-OFFICE CORRESPONDENCE, dated May 27, 2010, SUBJECT: RESULTS OF HEADSPACE GAS SAMPLING QUARTERLY REPEAT DATA GENERATION LEVEL DATA REVIEW: OAK RIDGE NATIONAL LABORATORY THIRD QUARTER OF 2009

d) Verified CCP-SRS letter CP:10:01363 UFC:5900.00 INTER-OFFICE CORRESPONDENCE, dated June 4, 2010, SUBJECT: RESULTS OF THIRD QUARTER 2009 (JULY 1, 2009 THROUGH SEPTEMBER 30, 2009) HEADSPACE GAS SAMPLING QUARTERLY REPEAT OF DATA GENERATION LEVEL DATA REVIEW, VALIDATION, AND VERIFICATION AT THE SAVANNA RIVER SITE

Verified CCP-SRS letter CP:10:01364 UFC:5900.00 INTER-OFFICE CORRESPONDENCE, dated June 4, 2010, SUBJECT: RESULTS FOR FOURTH QUARTER 2009 (OCTOBER 1, 2009 THROUGH DECEMBER 31, 2009) HEADSPACE GAS SAMPLING QUARTERLY REPEAT OF DATA GENERATION LEVEL DATA REVIEW, VALIDATION, AND VERIFICATION AT THE SAVANNA RIVER SITE

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- e) Verified CCP-GEV letter CP:10:01350 UFC:5900.00 INTER-OFFICE CORRESPONDENCE, dated June 2, 2010, SUBJECT: RESULTS OF HEADSPACE GAS SAMPLING QUARTERLY REPEAT DATA GENERATION LEVEL DATA REVIEW: GENERAL ELECTRIC VALLECITOS NUCLEAR CENTER – REMOTE-HANDLED FOURTH CALENDAR QUARTER OF 2009
- f) Verified and accepted the Headspace Gas BDR date as defined as the date the ITR signs off the ITR Checklist of the BDR

Investigative Actions:

- 2. *Extent: For reasons explained in the Root Cause Determination section of this Corrective Action Plan, CCP has for some time only been producing HSG quarterly reports for one CCP Host location per quarter. For this reason, the extent of condition includes not only LANL, but also INL, ORNL, SRS, And GEVNC. The specific HSG quarterly reports remaining to be completed are those listed in the Remedial Actions section of the Corrective Action Plan.*

CCP also reviewed the status of BDR data quarterly re-reviews for Nondestructive Examination, the other characterization method for which quarterly reviews are required by CCP-TP-001. The review showed that the following quarterly re-reviews have been requested (letters were issued) but actual re-reviews are not yet complete:

- *The LANL third quarter BDR re-review for RTR*
- *The LANL third quarter BDR re-review for VE*
- *The LANL third quarter BDR re-review for OSR-VE*
- *The SRS fourth quarter BDR re-review for RTR*

The review for extent of condition resulted in the identification of another issue related to selection of BDRs for data quarterly review. It was determined that the date of the BDR, and hence the quarter, was not being consistently determined. Two site SPMs were using the sampling date, one site SPM was using the ITR date, and one site was using the SPM review date to determine which quarter a particular BDR was associated. Depending on the selection criteria, a particular BDR produced at the end of a quarter might fall into the same period or the next period. While this is not a significant issue, the selection criteria should be consistent, and the issue is addressed in the Actions to Prevent Recurrence section of this Corrective Action Plan.

Impact: Performance of the data quarterly a repeat review is a quality check on one previously completed BDR at each Host location where CCP performed characterization. In accordance with CCP procedures, the original BDRs were independently reviewed by an Independent Technical Reviewer and a Site Project Manager at the time they were produced. Failure to perform HSG data quarterly repeat reviews is considered to have negligible impact. There is further consideration that all delinquent HSG data quarterly repeats will be completed as part of CCP corrective actions in response to the CAR condition. In the unlikely event that any problems are noted, they would be resolved in accordance with the requirements of CCP-TP-001.

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Verification:

2. Verified CCP Closure Package for CBFO CAR 10-029 (Action 2) "Quarterly Repeats: Letters Confirming that Each of the Repeat Reviews has been Completed and that No Discrepancies were Identified"
 - a) Verified CCP-LANL letter CP:10:01347 UFC:5900.00 INTER-OFFICE CORRESPONDENCE, dated June 2, 2010, SUBJECT: RESULTS OF THIRD QUARTER 2009 (JULY 1, 2009 THROUGH SEPTEMBER 30, 2009) NON-DESTRUCTIVE EXAMINATION QUARTERLY REPEAT DATA GENERATION LEVEL DATA REVIEW AT THE LOS ALAMOS NATIONAL LABORATORY
 - b) Verified CCP-LANL letter CP:10:01355 UFC:5900.00 INTER-OFFICE CORRESPONDENCE, dated June 3, 2010, SUBJECT: RESULTS OF THIRD QUARTER 2009 (JULY 1, 2009 THROUGH SEPTEMBER 30, 2009) VISUAL EXAMINATION QUARTERLY REPEAT DATA GENERATION LEVEL DATA REVIEW AT THE LOS ALAMOS NATIONAL LABORATORY
 - c) Verified CCP-LANL letter CP:10:01319 UFC:5900.00 INTER-OFFICE CORRESPONDENCE, dated May 24, 2010, SUBJECT: THIRD QUARTER 2009 (JULY 1, 2009 THROUGH SEPTEMBER 30, 2009) OFF-SITE SOURCE RECOVERY PROGRAM VISUAL EXAMINATION QUARTERLY REPEAT DATA GENERATION LEVEL DATA REVIEW AT THE LOS ALAMOS NATIONAL LABORATORY
 - d) Verified CCP-SRS letter CP:10:01362 UFC:5900.00 INTER-OFFICE CORRESPONDENCE, dated June 4, 2010, SUBJECT: RESULTS FOR FOURTH QUARTER 2009 (OCTOBER 1, 2009 THROUGH DECEMBER 31, 2009) NON-DESTRUCTIVE EXAMINATION QUARTERLY REPEAT OF DATA GENERATION LEVEL DATA REVIEW, VALIDATION, AND VERIFICATION AT THE SAVANNAH RIVER SITE

Actions to Preclude Recurrence:

CCP will issue a standing order to clearly establish which SPM has responsibility for ensuring that the appropriate Quarterly BDR re-reviews are performed. In addition, the standing order will standardize the acceptable date for determining which quarter a BDR is associated with.

The SPM Team Lead will track all Quarterly re-reviews to ensure that this important quality step is performed in a timely manner.

Verified the CCP Closure package for CBFO CAR 10-029 (Actions 3 and 4) with Standing Order CCP-SO-061 containing who is responsible for ensuring that quarterly re-reviews are being tracked and performed as required. Also, the SPM will use the date that the ITR signs the BDR as the date that the quarterly report will become available for quarterly re-review.

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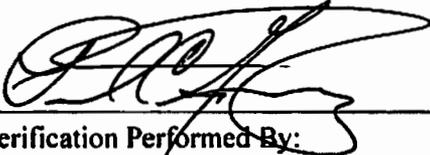
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Conclusion:

Verified through the results provided in the investigative action section, the concerns have been adequately addressed and closed.

The review and verification of the completion documentation provided indicate that the remedial actions and actions to preclude recurrence are satisfactorily implemented. Therefore, it is recommended that the CAR 10-029 be considered closed.



Verification Performed By:
Paul C. Gomez
CBFO Technical Assistance Contractor

6/24/10

Date