



Department of Energy
 Carlsbad Field Office
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July 2, 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 Corrective Actions Submitted in Response to CBFO CAR 10-025, Audit A-10-14, Los Alamos National Laboratory Central Characterization Project 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 Corrective Action Report (CAR) 10-025, which resulted from CBFO Audit A-10-14, Los Alamos National Laboratory, Central Characterization Project characterization activities. The results of the verification concluded that the associated corrective actions have been fulfilled and are satisfactorily implemented. Therefore, CAR 10-025 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

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M. Mullins, WTS	ED	WIPP Operating Record	ED
G. Rael, LASO	ED	CBFO QA File	
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CAR CONTINUATION SHEET

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2. Activity No: A-10-14

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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) 10-025, 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 10-025 identified one condition adverse to quality: *"During visual examination (VE) in TA-55 and TA-50, the CCP VE operators record their field observations manually on data forms. These are surveyed out and the data are then transferred to electronic versions of the VE data sheets for the output container that are included in the BDR. The original handwritten field record is destroyed after the data are entered in the final VE data sheets. Therefore, the ITR does not have an opportunity to verify the data have been properly transferred and reduced from the field records."*

The CCP was required to address Remedial Actions, Investigative Actions, Root Cause, and Actions to Preclude Recurrence.

Remedial Actions:

- *CCP has directed that VE personnel use the original hand-generated VE Data Forms for insertion in the VE BDRs.*

Verification:

The implementation and effectiveness of this corrective action was verified during CBFO Surveillance S-10-31.

Investigative Actions:

The investigative actions and extent of condition described in the initial corrective action plan submittal (Ploetz to Miehl, CP:10:01303, UFC:2300.00, dated May 20, 2010) were reviewed and were deemed to adequately address the condition adverse to quality.

Root Cause

The root cause described in the initial corrective action plan submittal (Ploetz to Miehl, CP: 10:01303, UFC:2300.00, dated May 20, 2010) was reviewed and was deemed to adequately address the condition adverse to quality.

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Actions to Preclude Recurrence:

CCP has issued Standing Order CCP-SO-LANL-042, Revision 0, directing VE operators to include any field records generated during VE of containers in the BDR documentation, making the information available for review by the Independent Technical Reviewer. The Standing Order will remain in effect until CCP-TP-113 has been revised to incorporate the requirements of the Standing Order into the procedure.

Verification:

The effectiveness of the Standing Order was verified during CBFO Surveillance S-10-31. Revision 14 of CCP-TP-113 is effective June 30, 2010, and adequately addresses the issue of field records being included in BDRs.

Conclusion:

The review and verification of the completion documentation provided and the results of Surveillance S-10-31 indicate that the remedial actions and actions to preclude recurrence are satisfactorily implemented. Therefore, it is recommended that CAR 10-025 be closed.



Verification Performed By:

Wayne Ledford

CBFO Technical Assistance Contractor



Date