



**Department of Energy**

Carlsbad Field Office  
P.O. Box 3090  
Carlsbad, New Mexico 88221  
October 22, 2010

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 Plan for CBFO CAR 11-001

Dear Mr. Ploetz:

Enclosed are the results of the Carlsbad Field Office (CBFO) review of the subject Corrective Action Plan (CAP) written in response to CBFO Corrective Action Report (CAR) 11-001, which resulted from CBFO Surveillance S-10-37. An evaluation of the proposed corrective actions is documented on the enclosed CAR Continuation Sheet, which indicates the CAP adequately addresses remedial actions, investigative actions, root cause determination, and actions to preclude recurrence of the condition adverse to quality. Based on this evaluation, the CAP is approved. Please provide supporting documentation to CBFO as evidence of completion of the corrective actions.

If you have any 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. Lee, EPA	ED
T. Morgan, CBFO	ED	S. Zappe, NMED	ED
W. Mackie, CBFO	ED	S. Holmes, NMED	ED
M. Navarrete, CBFO	ED	T. Kesterson, DOE OB WIPP NMED	ED
J. R. Stroble, CBFO	ED	D. Winters, DNFSB	ED
D. Haar, WTS/CCP	ED	P. Gilbert, LANL-CO	ED
V. Cannon, WTS/CCP	ED	G. Lyshik, LANL-CO	ED
A. J. Fisher, WTS/CCP	ED	P. Hinojos, CTAC	ED
I. Quintana, WTS/CCP	ED	G. White, CTAC	ED
T. Peake, EPA	ED	P. Gomez, CTAC	ED
M. Eagle, EPA	ED	WIPP Operating Record	ED
E. Feltcorn, EPA	ED	CBFO QA File	
R. Joglekar, EPA	ED	CBFO M&RC	
S. Ghose, EPA	ED	*ED denotes electronic distribution	



CBFO Form 3.1-2

## CAR CONTINUATION SHEET

1. CAR No: 11-001	2. Activity No: S-10-37	3. Page 1 of 3
-------------------	-------------------------	----------------

Block 16: Acceptance of Proposed Corrective Action Plan:

Central Characterization Project (CCP) remedial actions taken were reviewed. The remedial actions are shown in italics below. Underlined text discusses concerns with the adequacy of the remedial action.

**Remedial Actions Taken:** CCP has taken two remedial actions in response to the CAR condition:

- a) *CCP has qualified a Vendor Project Manager (VPM) for the CCP scope of work at the Bettis Atomic Power Laboratory (BAPL), and has assigned a back-up VPM to ensure continuity of support*
- b) *A qualified VPM has reviewed all previous logbook entries for the CCP scope at BAPL, and signed and dated the entries in accordance with CCP-PO-005, validating their accuracy and adequacy*

The proposed remedial actions taken by CCP are adequate.

### Investigative Actions:

*Extent – The extent of the reported condition is limited to the CCP scope of work at the Bettis Atomic Power Laboratory (BAPL). All major CCP host locations have VPMs assigned during project start-up, and Small Quantity Sites (SQS) do not require a VPM for intersite shipments of contact-handled TRU waste to another DOE location, since characterization for transportation is not CCP scope.*

*BAPL is the only SQS where RH TRU waste is currently being characterized for WIPP disposal certification under the CCP program, and therefore requires a VPM.*

*In the future, CCP will begin characterizing RH waste at Sandia National Laboratory (SNL) for WIPP disposal certification. At that time, a qualified VPM will be required for the CCP scope of work at SNL.*

*Impact – a) Section 3.6 of CCP-PO-511, CCP/BAPL RH TRU WASTE Interface Document, Revision 0, assigns the following duties to the VPM:*

- *Monitors the List of Qualified Individuals (LOQI) daily (when characterization activities are being performed) to confirm that only qualified personnel perform waste characterization activities.*
- *Functions as CCP's primary interface and point-of-contact between CCP and the Host site STR/Designee for characterization field operations.*
- *Provides pre-operation briefings when activities are being conducted.*
- *Ensures that in-process documents and the documents listed in [the Interface Document] are transmitted to the CCP Site Project Office as soon as practicable in accordance with CCP-QP-008 and Technical Information Exchange Agreement.*
- *Ensures applicable Material Safety Data Sheets (MSDS) are maintained and available to support operations [not applicable up to this point].*
- *Provides oversight of field operations to ensure safe, efficient operations.*
- *Supervises day-to-day TRU waste characterization activities.*

CBFO Form 3.1-2

## CAR CONTINUATION SHEET

1. CAR No: 11-001

2. Activity No: S-10-37

3. Page 2 of 3

*Those duties that were applicable at BAPL were being performed, but by an individual who had, at the time, not fully completed his qualification as a VPM for the site. There is no reason to believe that these activities were not adequately performed: the issue is lack of formal qualification for the position. Based on the above considerations, the impact of the reported condition is minimal.*

*b) The CAR also states that the weekly logbook entry reviews required by CCP-PO-005 could not be performed without a VPM designated for the site. As noted in the Remedial Action section of this CAP, all logbook entries have been reviewed by a qualified VPM, and no issues were found with respect to accuracy and adequacy. This result provides strong support for the conclusion that there has been no impact from this element of the CAR condition. There is no impact on the CCP certified program since the requirement is an operational element (logkeeping) flowing down from DOE Order 5480.19, Guidelines for the Conduct of Operations at DOE Facilities, which is not part of the CCP certified program.*

The proposed investigative actions by CCP are adequate although the project has not been scheduled for certification until January 2011.

### **Root Cause Determination:**

*BAPL is a Small Quantity Site with intermittent operations and a very small CCP presence. Since BAPL personnel operate the manipulators and move the waste, there are typically only about two CCP operators required onsite to perform characterization.*

*The need for a VPM at BAPL was recognized well before CCP began performing work, an individual was selected for the position, and qualification activities were initiated under supervision of a qualified Program Manager/Vendor Project Manager at another CCP host location. Due to CCP project management inattention, it was not discovered until after the individual was deployed to BAPL and began performing VPM functions that he had not completed the qualification process and had not fully signed off for the position. The individual did not inform management that he had not completed the qualification process before starting to perform the functions of a VPM, and project office management for this SQS did not have an onsite presence that would have alerted them to the problem.*

The proposed root cause determination is adequate.

### **Actions to Preclude Recurrence:**

*CCP has determined that the following actions are adequate to prevent recurrence of the CAR condition:*

- a) CCP has issued Lessons Learned 2010-06 on management of operations at SQS locations versus larger CCP host sites, with emphasis on the VPM situation that occurred at BAPL*

