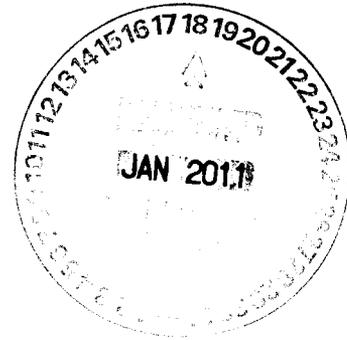


Department of Energy  
 Carlsbad Field Office  
 P. O. Box 3090  
 Carlsbad, New Mexico 88221

JAN 18 2011



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

Subject: Evaluation of the CAP for CAR 11-015 from Surveillance S-11-10, SRS/CCP Large Container Non-Destructive Examination System Activities

Dear Mr. Ploetz:

Enclosed are the results of the Carlsbad Field Office (CBFO) evaluation of the Corrective Action Plan (CAP) written in response to CBFO Corrective Action Report (CAR) 11-015, which was identified during Surveillance S-11-10, SRS/CCP Large Container Non-Destructive Examination System activities. The results of the evaluation are documented on the enclosed CAR Continuation Sheet, which indicates rejection of the submitted CAP. Please review the enclosed CAR Continuation Sheet and submit a revised CAP for CAR 11-015 on or before January 26, 2011.

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

Sincerely,

Dennis S. Miehls  
 Senior Quality Assurance Specialist

Enclosure

cc: w/enclosure

M. Navarrete, CBFO	* ED	S. Ghose, EPA	ED
J. R. Stroble, CBFO	ED	R. Lee, EPA	ED
T. Morgan, CBFO	ED	S. Zappe, NMED	ED
N. Castaneda, CBFO	ED	S. Holmes, NMED	ED
D. Haar, WTS/CCP	ED	T. Kesterson, DOE OB WIPP NMED	ED
V. Cannon, WTS/CCP	ED	D. Winters, DNFSB	ED
A. J. Fisher, WTS/CCP	ED	P. Gilbert, LANL-CO	ED
M. Walker, WTS/CCP	ED	G. Lyshik, LANL-CO	ED
Y. Salmon, WTS/CCP	ED	P. Y. Martinez, CTAC	ED
J. Hoff, WTS	ED	P. Martinez, CTAC	ED
M. A. Mullins, WTS	ED	P. Hinojos, CTAC	ED
H. Crapse, DOE-SR	ED	G. White, CTAC	ED
T. Peake, EPA	ED	WIPP Operating Record	ED
M. Eagle, EPA	ED	CBFO QA File	
E. Feltcorn, EPA	ED	CBFO M&RC	
R. Joglekar, EPA	ED	*ED denotes electronic distribution	



CBFO Form 3.1-2

## CAR CONTINUATION SHEET

1. CAR No: CAR 11-015

2. Activity No: S-11-10

3. Page 1 of 2

### Block # 16 Acceptance of Proposed Corrective Actions:

An evaluation was performed of the corrective action plan (CAP) developed in response to CBFO Corrective Action Report (CAR) 11-015, submitted via URS Washington TRU Solutions, LLC, letter CP:11:01005, dated January 10, 2011, from Mr. D. K. Ploetz, Manager, Central Characterization Project Retrieval, Characterization and Transportation, to Mr. M. P. Navarrete, Acting Quality Assurance Director, Carlsbad Field Office.

The results of the CAP evaluation indicate that the CAP does not adequately address Remedial Actions, Investigative Actions, Root Cause Determination, and Actions to Preclude Recurrence.

### CCP Proposed Remedial Actions Taken/To Be Taken:

CCP has identified the following remedial actions in response to the CAR condition:

- a) If necessary, based on guidelines/examples to be developed by CCP that define what constitutes a sharp/heavy object, CCP will revise BDRs for SLB2s as required, to identify the location of sharp/heavy objects. See "Root Cause Determination and Actions to Prevent Recurrence."

CBFO Evaluation: CCP procedure CCP-TP-053, Rev. 9, Section 4.4.3 [E.1] still requires that the "locations of dense waste material, sharp/heavy objects" be recorded on Section 3 of Attachment 2 – CCP Radiography Data sheet. The proposed CCP remedial actions do not state that the referenced BDRs for SLB2s will be amended to include the location of the sharp/heavy objects in the audio/video media.

### CCP Proposed Investigative Actions:

#### Extent

Only two Standard Large Box (SLB2s) have been ran through the Large Container NDE to date. CCP reviewed preliminary information associated with other Standard Large Boxes (SLB 2's) and noted that some of the waste consisted of metal debris. Any action to revise any new BDR's that are generated in the next two months will be based on the guidelines to be developed by CCP defining what constitutes a sharp/heavy object.

#### Impact

The requirement for recording the locations of sharp/heavy objects contained in CCP-TP-053 (Rev. 9, Section 4.4.3) [E.1] is based on ensuring that TRAMPAC requirements for protecting the containment integrity of the SLB2 are met. As recognized by CBFO in the reference, containers SR57053103 and SR57171701 are both fully compliant with TRAMPAC requirements. There are no sharp or heavy objects in the payload container which have the potential to puncture these SLB2s under normal conditions for transport, as verified by radiography.

CBFO clarified in the reference that CAR 11-015 was issued for lack of documentation, specifically recording the location of dense waste material, sharp/heavy objects. If required by the guidelines, BDRs will be revised to record the location of metal debris, as discussed under Remedial Actions. There was no dense waste material, (i.e., impenetrables) which prevented the Data Quality Objectives (DQOs) for radiography from being met.

CBFO Evaluation: Regardless of whether the requirements are based on ensuring TRAMPAC requirements, the procedure as written still requires the RTR operator to record the location of the sharp/heavy objects. In addition, since CCP is utilizing procedure CCP-TP-053 for performing RTR activities on SLB2s, CCP needs to review the procedure to ensure all TRAMPAC requirements for SLB2s are met. (Example: CCP-TP-053, Rev. 9, Attachment 2, Section 5 addresses only "TRUPACT II Criteria.")

CBFO Form 3.1-2

### CAR CONTINUATION SHEET

1. CAR No: CAR 11-015

2. Activity No: S-11-10

3. Page 2 of 2

CCP Proposed Root Cause Determination:

The subjectivity of the term "sharp/heavy objects" led to different interpretations by CCP and CBFO on the way that sharp/heavy objects should be defined. CCP interpreted sharp/heavy objects based on Revision 2 of the TRUPACT- III TRAM PAC (Section 2.6.1) which states: "Sharp or heavy objects in the payload container shall be blocked, braced, or suitably packaged as necessary to provide puncture protection for the payload container packaging these items." Based on the nondestructive examination performed by CCP's qualified radiographers, there were no sharp/heavy objects in the payload container that could puncture the SLB2 payload container. Therefore, CCP's interpretation was that the requirement in Section 4.4.3 [E .1] of CCP-TP-053 to record location did not apply. CBFO had a different interpretation of what constitutes a sharp/heavy object; under this interpretation, the requirement to identify the location of sharp/heavy objects applied regardless of whether container integrity is in question.

CCP agrees that the definition of what constitutes a sharp/heavy object is subjective and therefore is open to different interpretations. In order to address this condition, CCP will develop guidelines/examples for a qualified real-time radiographer to use in making their determinations, as discussed below in the Actions to Prevent Recurrence.

CBFO Evaluation: Acceptable

CCP Proposed Actions To Preclude Recurrence:

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

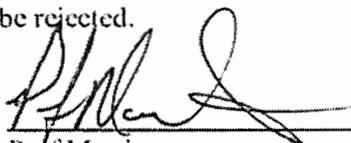
- a) Revise CCP-TP-053, Section 4.4.3 [E .1] to read: "Locations of dense waste material, sharp/heavy objects that are not adequately blocked, braced, or packaged and could potentially puncture the payload container." Either this or similar wording will be used to clarify the intent of what is to be recorded.
- b) Develop guidelines/examples for a qualified real-time radiographer to use in making a determination about what constitutes a sharp/heavy object and determining whether it is adequately blocked, braced or packaged.
- c) Provide training to the real-time radiographers who are qualified to NDE boxes on the application of these guidelines/examples.

CBFO Evaluation: In addition, CCP needs to revise procedure CCP-TP-053 to include TRAMPAC requirements for the SLB2, and document RTR Operator training.

Additional information was provided via e-mail from David Ploetz, to Dennis Miehl, Martin Navarrete, and J. R. Stroble, on January 17, 2011, referring to the issuance of a Standing Order. If Standing Order is in support of CBFO CAR 11-015, please incorporate and resubmit in a revised CAP.

CONCLUSION:

Based on the results of the review and the referenced e-mail as described above, I recommend the CAP for CAR 11-015 be rejected.

  
\_\_\_\_\_  
Poff Martinez

1/18/2011  
Date