



Department of Energy
 Carlsbad Field Office
 P. O. Box 3090
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MAR 11 2011



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

Subject: Verification and Acceptance of Corrective Actions for CAR 11-015 from Surveillance S-11-10, SRS/CCP Large Container Non-Destructive Examination System

Dear Mr. Ploetz:

Enclosed are the results of the Carlsbad Field Office (CBFO) review and verification of completion of the corrective actions associated with CBFO Corrective Action Report (CAR) 11-015, which resulted from Surveillance S-11-10. The results of the verification are documented on the enclosed CAR Continuation Sheet, which indicates that the documentation of completion of corrective actions is acceptable.

The verification concluded that the associated corrective actions have been fulfilled and are satisfactorily implemented. The CAR is considered closed.

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

Sincerely,

Dennis S. Miehls
 Senior Quality Assurance Specialist

Enclosure

cc: w/enclosure

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T. Peake, EPA	ED	WIPP Operating Record	ED
M. Eagle, EPA	ED	CBFO QA File	
E. Feltcorn, EPA	ED	CBFO M&RC	

*ED denotes electronic distribut



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CAR CONTINUATION SHEET

1. CAR No: 11-015

2. Activity No: S-11-10

3. Page 1 of 3

Block # 17 Acceptance of Corrective Action Completion:

The Carlsbad Field Office (CBFO) has evaluated the evidence supporting completion of the corrective actions associated with CBFO Corrective Action Report (CAR) 11-015, which identified conditions adverse to quality during CBFO Surveillance S-11-10, Savannah River Site Central Characterization Project. Verification of evidence included a review of closure documentation submitted to CBFO via Washington TRU Solutions, LLC (WTS) letter CP:11:01139 dated March 7, 2011, from D. K. Ploetz, Manager, to Dennis S. Miehl, CBFO, Senior Quality Assurance Specialist. The following summarizes the methods used in verifying completion of each action as detailed in the corrective action plan (CAP) previously submitted and approved. Italicized text, taken verbatim from the CAP, is used to show the correlation between the corrective action and the method used for verification.

REMEDIAL ACTIONS

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

1. *CCP has issued Standing Order CCP-SO-070, Revision Original, clarifying the circumstances under which the location of dense or heavy/sharp objects must be recorded in Radiography Data Sheets. The Standing Order states that it will remain in effect until CCP-TP-053 is revised to incorporate the clarification into the procedure.*

Verification:

Verified through review of CAR closure documentation that CCP issued Standing Order CCP-SO-070, Revision Original, clarifying the circumstances under which the location of dense or heavy/sharp objects is recorded in the Radiography Data Sheets.

Verified through review of CAR closure documentation that the Standing Order was in effect until issuance of CCP-TP-053, Rev. 10, effective date, 03/04/11, incorporating clarifications into the procedure.

Verified through review of CAR closure documentation that CCP Standing Order CCP-SO-070, Rev. 0 was cancelled on 3/7/2001 by Mark Percy.

2. *CCP has revised Batch Data Report SRLBR0002 to identify the location of dense or sharp/heavy materials inside SR57053103 and SR57171701.*

Verification:

Verified through review of CAR closure documentation that CCP has revised Batch Data Report SRLBR0002 to identify the location of dense or sharp/heavy materials inside containers SR57053103 and SR57171701.

CBFO Form 3.1-2

CAR CONTINUATION SHEET

1. CAR No: 11-015

2. Activity No: S-11-10

3. Page 2 of 3

INVESTIGATIVE ACTIONS

Investigative actions were reviewed and found to be acceptable as stated in CBFO letter CBFO:OQA:DSM:MAG:11-0444:UFC 2300.00 referencing "Evaluation of the Revised CAP for CBFO CAR 11-015 from Surveillance S-11-10, SRS/CCP."

ROOT CAUSE DETERMINATION

1 The Root Cause Determination was reviewed and found to be acceptable as stated in CBFO letter CBFO:OQA:DSM:MAG:11-0444:UFC 2300.00 referencing "Evaluation of the Revised CAP for CBFO CAR 10-015 from Surveillance S-11-10, SRS/CCP."

ACTIONS TO PRECLUDE RECURRENCE

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

3. *Revise CCP-TP-053, Section 4.4.3 [E.1] to read: "Locations of dense waste material, sharp/heavy objects if container is to be rejected for transportation packaging issues." Either this or similar wording will be used to clarify the intent of what is to be recorded.*

Verification:

Verified through review of CAR closure documentation that CCP-TP-053 was revised and Section 4.4.3 was deleted. Verified revisions to CCP-TP-053, Table 1 and Attachment 2, "CCP Radiography Data sheet," included changes to Section 5: CH or RH TRAMPAC, that address indications of inadequate protection for heavy and/or sharp objects.

4. *Revise CCP-TP-053 to include TRAMPAC requirements for the SLB2.*

Verification:

Verified through review of CAR closure documentation that CCP-TP-053 was revised and changes to CCP-TP-053, Attachment 2 "CCP Radiography Data sheet," Section 5: CH or RH TRAMPAC, included TRAMPAC requirements for the SLB2.

5. *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.*

CBFO Form 3.1-2

CAR CONTINUATION SHEET

1. CAR No: 11-015

2. Activity No: S-11-10

3. Page 3 of 3

Verification:

Verified through review of CAR closure documentation that examples for qualified real-time radiographers were developed for making a determination about what constitutes a sharp/heavy object and determining whether it is adequately blocked, braced or packaged.

6. *Provide documented training to the real-time radiographers who are qualified to NDE boxes on the application of these guidelines/examples.*

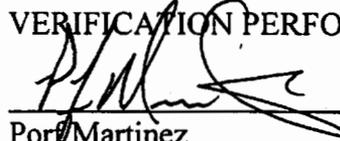
Verification:

Verified through review of CAR closure documentation that training for qualified real-time radiographers on the application of these guidelines/examples to NDE boxes was conducted by Mr. Craig Simmons on 03/02/2011 and recorded on the CCP Attendance sheet for CBFO CAR 11-015, Sharp/Heavy Objects Requiring Blocking or Bracing.

CONCLUSION

Based on the review of the closure documentation submitted, it has been determined that the remedial, investigative, root cause determination, and actions to preclude recurrence, adequately address the CAR conditions. Therefore, it is recommended that CBFO CAR 11-015 be closed.

VERIFICATION PERFORMED BY:



P. Martinez
Carlsbad Field Office
Technical Assistance Contractor

3/9/2011
Date