




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

MAY 31 2011



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

Subject: Issuance of CARs 11-036, 11-037, and 11-038 from Audit A-11-11

Dear Mr. Ploetz:

The Carlsbad Field Office (CBFO) performed Recertification Audit A-11-11 of the Los Alamos National Laboratory Central Characterization Project characterization activities on May 17-19, 2011. Enclosed are CBFO Corrective Action Reports (CARs) 11-036, 11-037, and 11-038 addressing the conditions adverse to quality identified during the audit.

Please provide a documented response for the CARs, ensuring that each of the required actions indicated in Block 12 are addressed, including a schedule for completion. Please return your responses to me on or before the due date identified in Block 14a.

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

Sincerely,

Dennis S. Miehl
Senior Quality Assurance Specialist

Enclosure



Mr. D. K. Ploetz

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MAY 31 2011

cc: w/enclosure

R. Unger, CBFO	* ED
J.R. Stroble, CBFO	ED
M. Navarrete, CBFO	ED
N. Castaneda, CBFO	ED
D. Haar, WTS/CCP	ED
V. Cannon, WTS/CCP	ED
A. J. Fisher, WTS/CCP	ED
M. Walker, WTS/CCP	ED
Y. Salmon, WTS/CCP	ED
J. Hoff, WTS	ED
M. Mullins, WTS	ED
G. Rael, LASO	ED
L. Bishop, LASO	ED
T. Peake, EPA	ED
M. Eagle, EPA	ED
E. Feltcorn, EPA	ED
R. Joglekar, EPA	ED
S. Ghose, EPA	ED
R. Lee, EPA	ED
J. Kieling, NMED	ED
T. Hall, NMED	ED
S. Holmes, NMED	ED
T. Kesterson, DOE OB WIPP NMED	ED
D. Winters, DNFSB	ED
P. Gilbert, LANL-CO	ED
G. Lyshik, LANL-CO	ED
P. Hinojos, CTAC	ED
G. White, CTAC	ED
G. Knox, CTAC	ED
R. Allen, CTAC	ED
M. Lin, CTAC	ED
P. Martinez, CTAC	ED
C. Castillo, CTAC	ED
WIPP Operating Record	ED
CBFO QA File	
CBFO M&RC	

*ED denotes electronic distribution

CBFO Form 3.1-1

CORRECTIVE ACTION REPORT

1. CAR No.: 11-036	2. Activity Report No.: A-11-11	3. Page 1 of 2
4. Controlling document: CCP-TP-093 CCP-TP-106	5. CBFO Assessment Team Leader: Dennis Miehls	
6. Responsible organization: LANL-CCP	7. CAQ was discussed with: Eric Loechell/Sue Peterman	
8. Requirement that was violated: <ul style="list-style-type: none"> • CCP-TP-093, Revision 14, Section 4.3.1 – “For all containers to be sampled, verify the DAC prior to sampling by using Tables 1-5, as appropriate.” • CCP-TP-106, Revision 7, Attachment 3, #2: “Are the calculations correct for the Drum Age Criteria (DAC)...?” • CCP-QP-008, Revision 18, Section 3.7.3 – “Ensures that records are legible, accurate and complete, appropriate to the work accomplished, when generating, reviewing and validating records.” 		
9. Condition Adverse to Quality (CAQ): The Container Ages for four containers listed in BDR LAHSG1101 were not calculated correctly based on the AK documentation. The Sample Container Data Form had previously been revised to address Container Age discrepancies for three containers as a result of NCR-LANL-0506-11. The Container Ages for the four other containers were inadvertently revised and the errors were not identified during the ITR and SPM Reviews. In addition, the revised Sample Container Data Form was dated with the original date of 01/10/11 instead of the actual revision date. The original data form was superseded on 01/24/11 and NCR-LANL-0506-11 was initiated on 01/26/11.		
10. Suggested actions (Optional):		
11a. Significant CAQ? (If 'Yes', go to block 15b) Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>		12. Type of actions required: Remedial? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Investigative? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Root Cause Determination? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Actions to Preclude Recurrence? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
11b. Work Suspension recommended? (If 'Yes', go to block 15b) Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>		
11c. RCRA related? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>		
11d. Accelerated corrective action required? (If 'Yes', go to block 15b) Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>		
11e. Does this CAQ affect waste streams BNINW216 or BNIN218? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>		
13a. Trend Code: HG05	13b. CAR Initiator: <i>[Signature]</i> (printed name) Mavis Lin / Tammy Bowden	Date: 5/17/2011
14a. Response due date: 6-15-11		
14b. Required corrective action completion date: N/A		
15. Concurrence:		
a. Assessment Team Leader: <i>[Signature]</i> (printed name) Dennis S. Miehls		Date: 5-31-11
b. CBFO Quality Assurance Director (if SCAQ, work suspension, or accelerated corrective action, sign here; otherwise, mark as N/A): (printed name) N/A		Date:
16. Acceptance of Proposed Corrective Actions:		Date:
(printed name) _____		_____
17. Acceptance of Corrective Action Completion:		Date:
(printed name) _____		_____
18. Closure:		Date:
(printed name) _____		_____

CBFO Form 3.1-1

CORRECTIVE ACTION REPORT

1. CAR No.: 11-037		2. Activity Report No.: A-11-11		3. Page 1 of 1	
4. Controlling document: CCP-TP-053			5. CBFO Assessment Team Leader: Dennis Miehls		
6. Responsible organization: LANL/CCP			7. CAQ was discussed with: Larry Porter, Steve Ewing		
<p>8. Requirement that was violated:</p> <ul style="list-style-type: none"> • CCP-TP-053, Rev. 10, Section 4.4.2 [F] Using packaging weight information provided by the Host site, record the estimated weight (kg) for the packaging materials in Section 4: Packaging Material and Waste Material Parameters, of Attachment 2. [G] Using Table 2, Waste Material Parameters, Table 3, Waste Item Weights, and additional item weight information provided by the Host site, record the estimated weight for each WMP and sum all WMPs and record the total WMP weight in Section 4 of Attachment 2." • CCP-TP-001, Rev. 19, Section 4.2.1, "Initiate BDR review in the P-TS as follows..." 					
<p>9. Condition Adverse to Quality (CAQ):</p> <p>For container 61265 in BDR LA-RTR2-10-0137, the assigned weights and the waste material parameters documented in CCP-TP-053, Att. 2, Section 4, "Packaging Material and Waste Material Parameters," do not correlate to the actual items identified in the waste container as documented in Section 3, "Container Inventory and Comments."</p> <p>In BDR LA-RTR2-10-0129, NCRs associated with the BDR are not recorded on the SPM checklist item number 6. The BDRs identified in SPM checklist item numbers 17 and 18 are not recorded correctly. In containers 65720 and 87139, the assigned weights and the waste material parameters documented in CCP-TP-053, Att. 2, Section 4, "Packaging Material and Waste Material Parameters," do not correlate to the actual items identified in the waste container as documented in Section 3, "Container Inventory and Comments."</p>					
10. Suggested actions (Optional):					
11a. Significant CAQ? (If 'Yes', go to block 15b)		Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	12. Type of actions required:	
11b. Work Suspension recommended? (If 'Yes', go to block 15b)		Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	Remedial?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
11c. RCRA related?		Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	Investigative?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
11d. Accelerated corrective action required? (If 'Yes', go to block 15b)		Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	Root Cause Determination?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
11e. Does this CAQ affect waste streams BNINW216 or BNIN218?		Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	Actions to Preclude Recurrence?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
13a. Trend Code: RT06		13b. CAR Initiator: <u>P. Martinez</u> <small>(printed name)</small>		Date: <u>31 MAY 2011</u>	
14a. Response due date: <u>6-15-11</u>					
14b. Required corrective action completion date: <u>N/A</u>					
15. Concurrence:					
a. Assessment Team Leader:		<u>Dennis S. Miehls</u> <small>(printed name)</small>		Date: <u>5-31-11</u>	
b. CBFO Quality Assurance Director (if SCAQ, work suspension, or accelerated corrective action, sign here; otherwise, mark as N/A):		<u>N/A</u> <small>(printed name)</small>		Date: _____	
16. Acceptance of Proposed Corrective Actions:				Date: _____	
<small>(printed name)</small>				_____	
17. Acceptance of Corrective Action Completion:				Date: _____	
<small>(printed name)</small>				_____	
18. Closure:				Date: _____	
<small>(printed name)</small>				_____	

CBFO Form 3.1-1

CORRECTIVE ACTION REPORT

1. CAR No.: 11-038	2. Activity Report No.: A-11-11	3. Page 1 of 1
4. Controlling document: CCP-QP-002		5. CBFO Assessment Team Leader: Dennis Miehl
6. Responsible organization: LANL/CCP		7. CAQ was discussed with: R. Martin, A.J. Fisher, M. Billett
8. Requirement that was violated: <ul style="list-style-type: none"> • CCP-QP-002, Section 4.1.2(B) states, "All CCP qualification cards shall be issued by CCP Training. CCP Training will verify current revision & that prerequisites are met." • CCP-QP-002, Section 4.1.2.E [E.3] A, states, "CCP Training, prepare the revised CCP Qualification Card, using the next sequential revision number." 		
9. Condition Adverse to Quality (CAQ): CCP Training personnel did not issue the current revision (Rev. 4) of FGA-01, Flammable Gas Analysis (FGA) Operator/Independent Technical Reviewer (ITR) Qualification Card for qualifying operators in 4/2011. Revision 0 was issued instead of Revision 4. (NOTE: This is an administrative issue with form revision, not content, and does not affect qualification of personnel.)		
10. Suggested actions (Optional): Verify expected qualification card revision status is reflected in Q&MIS and investigate/correct all FGA-01 Revision 0 qualification cards that were issued inadvertently.		
11a. Significant CAQ? (If 'Yes', go to block 15b) Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>		12. Type of actions required: Remedial? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Investigative? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Root Cause Determination? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Actions to Preclude Recurrence? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
11b. Work Suspension recommended? (If 'Yes', go to block 15b) Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>		
11c. RCRA related? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>		
11d. Accelerated corrective action required? (If 'Yes', go to block 15b) Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>		
11e. Does this CAQ affect waste streams BNINW216 or BNIN218? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>		
13a. Trend Code: TQ05	13b. CAR Initiator: <u>Candi Castillo</u> (printed name) C. Castillo	Date: <u>5/24/11</u>
14a. Response due date: <u>6-15-11</u>		
14b. Required corrective action completion date: <u>N/A</u>		
15. Concurrence:		
a. Assessment Team Leader: <u>D. S. Miehl</u> (printed name) Dennis S. Miehl		Date: <u>5-31-11</u>
b. CBFO Quality Assurance Director (if SCAQ, work suspension, or accelerated corrective action, sign here; otherwise, mark as N/A): (printed name) <u>N/A</u>		Date: _____
16. Acceptance of Proposed Corrective Actions: _____ (printed name)		Date: _____
17. Acceptance of Corrective Action Completion: _____ (printed name)		Date: _____
18. Closure: _____ (printed name)		Date: _____