



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

JUN 2 2011



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

Subject: Revised Evaluation of the CAP for CAR 11-029 from Audit A-11-10,
Hanford Site/CCP

Dear Mr. Ploetz:

The Carlsbad Field Office (CBFO) performed Audit A-11-10 of the Hanford Site Central Characterization Project (CCP) on April 5-7, 2011. CBFO Corrective Action Report (CAR) 11-029 was issued as a result of that audit.

Enclosed are the results of the CBFO review of the Washington TRU Solutions proposed Corrective Action Plan (CAP) for CAR 11-029. Evaluation of the proposed corrective actions is documented on the enclosed CAR Continuation Sheet. The results of the review indicate that the CAP for CAR 11-029 is acceptable.

If you have any questions or concerns regarding this evaluation, please contact me at (575) 234-7483.

Sincerely,

Martin P. Navarrete
Senior Quality Assurance Specialist

Enclosure

Mr. D. K. Ploetz

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JUN 2 2011

cc: w/enclosure

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CBFO QA File

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*ED denotes electronic distribution

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CAR CONTINUATION SHEET

1. CAR No: 11-029

2. Activity No: A-11-10

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Block # 16 Acceptance of Proposed Corrective Action

An evaluation was performed of the proposed Corrective Action Plan (CAP) for CBFO CAR 11-029 submitted via URS/Washington TRU Solutions letter CP:11:01309 UFC: 2300.00, dated May 12, 2011, from D. K. Ploetz to Mr. Martin P. Navarrete.

Italicized text, taken verbatim from the CAP, is used to show the correlation between the proposed corrective actions and evaluations performed by the audit team.

REMEDIAL ACTIONS

CCP has taken the following remedial action in response to the CAR condition:

- a) *CCP has revised Standing Order or Operator Aid CCP-SO-RL-01 to add the weight of the "Rad Pad" Universal polypropylene (UPP) absorbent pads to the list of weights for packaging material.*

Evaluation:

Review of the CAP associated with Remedial Action submitted by the above referenced letter determined that the proposed corrective action is acceptable.

INVESTIGATIVE ACTIONS

Extent

The Acceptable Knowledge Summary Report (CCP-AK-RL-116) cited in the CAR is the only AK document that identifies absorbent pads as either waste or packaging material. CCP-AK-RL-101 also lists absorbent pads, but only as a waste item. No AK documents for other CCP host locations refer to absorbent pads as either a waste or as packaging; the extent of the CAR condition is therefore limited to CCP-AK-RL-116 at Hanford

Impact

Although there was an inconsistency in how RTR operators chose to classify Rad Pads as packaging material or waste, there is no technical impact against the requirements of the WAP. The weights for all materials in the affected containers are accounted for in the RTR Data Sheets. The information in the completed RTR BDRs is adequate to ensure that all requirements of the WAP are satisfied, and that the three containers represented by this BDR can be WAP-certified for disposal. None of the criteria for WAP-certification depends in any way on a re-organization or re-arrangement of the data currently entered in the RTR-BDRs for the containers in CCP-AK-RL-116.

Evaluation:

Review of the CAP associated with Investigative Actions submitted by the above referenced letter determined that the proposed corrective action is acceptable. While it is true that overall WAP compliance may not be impacted, the inconsistency of classification for the Rad Pads should be determined by the AK summary.

CBFO Form 3.1-2

CAR CONTINUATION SHEET

1. CAR No: 11-029

2. Activity No: A-11-10

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ROOT CAUSE DETERMINATION

Section 2.0 of CCP-AK-RL-116, Revision 0, provides a listing of examples of potential waste items in the waste stream, the list includes: "Plastics: Universal polypropylene (UPP) absorbent pads, tape, poly tubing, poly bottle, bags, quick-connects, rubber bands, sampling equipment." Section 5.4.2 of the same AK document contains a list of waste items that potentially could be in the waste stream; this list contains the same reference to UPP absorbent pads that is quoted above. "Rad Pads" is the way that these UPP absorbent pads are informally referred to at Hanford.

As noted in the Extent section of this Corrective Action Plan. "Rad Pads" are specific to the Hanford Site. For this reason, operators were not as familiar with them as they are with other packaging materials commonly used at DOE sites such as rigid liners and liner bags. As noted in the CAR, Section 5.5 (Waste Packaging) of the AK does refer to the presence of absorbent pads between the liner and the bottom of the drum. Given their relative unfamiliarity with the absorbent pads used as packaging material, an RTR operator may have been influenced by the AK listings that show absorbent pads as examples of potential waste items in the waste stream, and consequently chose to classify the Rad Pads as waste instead of packaging. This created an inconsistency, with other RTR operators, who classified the Rad Pads as packaging. Based on CCP-AK-RL-116, Rev. 0, both interpretations are correct: Rad Pads may be classified as Packaging Material (Section 5.5) or as Waste (Sections 2.0 and 5.4.2). However, CCP expects RTR operators to be consistent in the way they classify Rad Pads (in this case, as packaging material). The Action to Prevent Recurrence section of this Corrective Action Plan addresses this consistency issue .

Evaluation:

Review of the CAP associated with Root Cause Determination submitted by the above referenced letter determined that the root cause determination is acceptable.

ACTIONS TO PREVENT RECURRENCE

Based on the results of the Investigative Actions undertaken by CCP, CCP has determined that the following action is appropriate to prevent recurrence of the CAR condition:

- a) *In order to improve consistency, CCP will brief RTR operators on CCP-AK-RL-116, which provides guidance for determining whether material inside a container is to be classified as waste material or packaging material. This guidance will be provided as a documented briefing and will reinforce the initial briefing for CCP-AK-RL-116.*

Evaluation:

Review of the CAP associated with actions to prevent recurrence submitted by the above referenced letter determined that the proposed corrective action is acceptable.

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CAR CONTINUATION SHEET

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ACCEPTANCE

The proposed corrective actions for remedial actions, investigative actions, root cause determination, and actions to prevent recurrence are acceptable. It is recommended that the CAP for CAR 11-029 be accepted.

Response Evaluated By: Priscilla Y. Martinez
Priscilla Y. Martinez

5-25-11
Date