



Department of Energy
Carlsbad Field Office
P. O. Box 3090
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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: Evaluation of the Documentation Supporting Completion of the Corrective
Actions Associated with CAR 11-028 Resulting From Audit A-11-10, Hanford Site/CCP

Dear Mr. Ploetz:

Enclosed are the results of the Carlsbad Field Office (CBFO) review and evaluation of documentation supporting completion of the corrective actions associated with CBFO Corrective Action Report (CAR) 11-028, which resulted from CBFO Audit A-11-10 of the Hanford Site/Central Characterization Project (CCP) characterization and certification activities. The results of the evaluation are documented on the CAR Continuation Sheet.

The evaluation verified completion of the required corrective actions. Therefore, CAR 11-028 is considered closed.

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

Sincerely,

Martin P. Navarrete
Senior Quality Assurance Specialist

Enclosure



Mr. D.K. Ploetz

-2-

JUN 2 2011

cc: w/enclosure

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WIPP Operating Record	ED

CBFO QA File

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*ED denotes electronic distribution

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CAR CONTINUATION SHEET

1. CAR No: 11-028

2. Activity No: A-11-10

3. Page 1 of 4

Block # 17 Acceptance of Corrective Action Completion:

CBFO has evaluated the evidence supporting completion of the corrective actions associated with CBFO Corrective Action Report (CAR) 11-028 identified during CBFO Audit A-11-10, Hanford/Central Characterization Project (CCP). Verification included review of completion documentation submitted via URS/Washington TRU Solutions letter CP:11:01346 UFC: 2300.00, dated May 19, 2011, from D. K. Ploetz to Mr. Martin P. Navarrete.

The following details 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 taken the following remedial action in response to the CAR condition:

- a) *CCP has completed the required Hanford data quarterly repeat reviews for all calendar quarters since CCP began producing BDRs, for RTR, HSG, and VE. In all cases, the quarterly repeat reviews were consistent with the results from the original BDRs: no deficiencies were identified.*
- b) *As noted in the Extent section of this Corrective Action Plan, CCP reviewed the status of performance of data generation level quarterly repeat reviews at all other host site locations. In all cases, CCP was current with quarterly repeat reviews.*
- c) *Standing Order CCP-SO-061 was revised to clarify quarterly reviews will begin the calendar quarter following characterization, regardless of certification status.*

Verification:

Closure documentation reviewed:

Item 1) WTS letter CP:11:01346-UFC:2300.00, CCP Closure Package for CBFO CAR 11-028, Action 1 (attachment 1), "Site Project Manager Evaluation Memoranda for Quarterly Repeat Reviews at the Hanford Site." Action 1 contains 15 memoranda providing documentation for completion of the repeat reviews of BDRs generated in each quarter (specifically identifying waste containers) since the initial certification audit (A-10-07). These memoranda provide objective evidence of completion of remedial action (a).

Item 2) WTS letter CP:11:01346-UFC:2300.00, CCP Closure Package for CBFO CAR 11-028, Action 2 (attachment 2), "Email from CCP Site Project Manager Team Lead confirming that quarterly repeat reviews are also current at other CCP host site locations." This email provides objective evidence of completion of remedial action (b).

Item 3) WTS letter CP:11:01346-UFC:2300.00, CCP Closure Package for CBFO CAR 11-028, Action 3 and 4 (attachment 3), "Standing Order CCP-SO-061, Revision 1, Quarterly Repeat of DGL Data Review, Validation and Verification Responsibilities, CCP-TP-001." The revised document provides clarification of the requirement for quarterly reviews to commence in the calendar year quarter following the start of characterization activities. The revised Standing Order provides objective evidence of completion of remedial action (c).

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CAR CONTINUATION SHEET

1. CAR No: 11-028

2. Activity No: A-11-10

3. Page 2 of 4

INVESTIGATIVE ACTIONS

Extent

CCP reviewed the status of performance of data generation level quarterly repeat reviews at all other host site locations. In all cases, CCP was current with quarterly repeat reviews: requests had been made for the repeat reviews for the first calendar quarter of 2011, and quarterly repeat reviews were complete for all quarters prior to 2011. The CAR condition is limited to the CCP scope of work at the Hanford Site.

Impact

Performance of the data quarterly repeat reviews is a quality check on one, previously-completed BDR at each host site location where CCP performs characterization. In accordance with CCP procedures, the original BDRs are independently reviewed by an Independent Technical Reviewer and a Site Project Manager at the time they are produced. Failure to perform data quarterly repeat reviews is considered to have no impact.

More importantly, as noted in the Remedial Actions section of this Corrective Action Plan, CCP has completed the required Hanford data quarterly repeat reviews for all calendar quarters since CCP began producing BDRs at the host site, for RTR, HSG, and VE. In all cases, the quarterly repeat reviews were consistent with the results from the original BDRs: no deficiencies were identified. As a consequence, there is no technical or quality impact from the CAR condition.

Verification:

Closure documentation reviewed:

Item 1) WTS letter CP:11:01346-UFC:2300.00, CCP Closure Package for CBFO CAR 11-028, Action 1 (attachment 1), "Site Project Manager Evaluation Memoranda for Quarterly Repeat Reviews at the Hanford Site." Action 1 contains 15 memoranda providing documentation for completion of the repeat reviews of BDRs generated in each quarter (specifically identifying waste containers) since the initial certification audit (A-10-07). These memoranda provide objective evidence that confirms the CAP Investigative Action and the resultant impact of the condition at the Hanford Site.

Item 2) WTS letter CP:11:01346-UFC:2300.00, CCP Closure Package for CBFO CAR 11-028, Action 2 (attachment 2), "Email from CCP Site Project Manager Team Lead confirming that quarterly repeat reviews are also current at other CCP host site locations." This email provides objective evidence that confirms that the extent of the condition was only related to the Hanford Site with no impact at other CCP sites.

ROOT CAUSE DETERMINATION

In March 2010, prior to the April 2010 initial certification audit, the Lead SPM at Hanford was sent an e-mail by her manager reminding her about the need to begin requesting and processing quarterly repeat reviews for Hanford BDRs. The opening sentence of this e-mail began as follows: "Now that we should get certified during the next quarter, on April 1 [2010] submit letters to perform QTRLY reviews for the quarter from Jan through March 2010." The e-mail closes with the statement, "This will demonstrate to the auditors that we are following the permit for quarterly reviews."

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CAR CONTINUATION SHEET

1. CAR No: 11-028

2. Activity No: A-11-10

3. Page 3 of 4

At the time the e-mail was sent, CCP had been producing BDRs at Hanford for only a short while. The Lead SPM at Hanford left CCP in May, 2010, so CCP is unable to ascertain exactly why she failed to follow through the direction provided by her manager in March 2010. However, it appears that she may have misinterpreted the opening sentence in the e-mail: "Now that we should get certified ...," and understood it to mean that data quarterly repeats were not actually required until after CCP had been certified at Hanford.

For reasons unrelated to the CAR condition, CCP did not become certified at Hanford until January 20, 2011, nine months after the initial certification audit. By the time the Lead SPM left CCP in May, 2010, the consensus within the CCP team at Hanford was that quarterly repeat reviews were not required until certification; the current Lead SPM simply continued to follow this interpretation that the requirement for performing quarterly repeat reviews did not apply until Hanford was certified.

As discussed below, the action to prevent recurrence for a previous CAR associated with quarterly repeat reviews, CAR 10-029, was for CCP to issue Standing Order CCP-SO-061, which requires the Project Office to track all quarterly repeat reviews to ensure they are being completed in a timely manner. Standing Order CCP-SO-061 was written based on the assumption that the sites where quarterly repeat reviews were being performed were already certified. Standing Order CCP-SO-061 did not address the special case of performing quarterly repeat reviews at a site that was in the process of being certified. CCP was already certified at all other major DOE sites with the exception of Hanford. It is not known why the previous Lead SPM at Hanford, who resigned from CCP around the time that the first set of quarterly repeat reviews were due, did not perform this task. Clear direction was not given to the current Lead SPM that quarterly repeat reviews were required. This allowed the propagation of an alternate interpretation that quarterly repeat reviews were not required until Hanford became certified in January 2011.

Effectiveness of Previous Corrective Actions

In June 2010, CCP received CBFO CAR 10-029 for failure to have performed quarterly repeat reviews for Headspace Gas Sampling (HSG) BDRs. For that CAR, the cause was miscommunication between the site SPMs and the Senior Chemical Technical Specialist. The site SPMs thought that the Senior Chemical Technical Specialist was performing the HSG quarterly repeat reviews for all sites. The Senior Chemical Technical Specialist was performing the re-reviews, but only for one per site per quarter.

The action to prevent recurrence for CAR 10-029 was for CCP to issue Standing Order CCP-SO-061, which requires the SPM Team Lead in the Project Office to track all quarterly repeat reviews to ensure that they are being completed in a timely manner. The SPM Team Lead in the Project Office has been complying with Standing Order CCP-SO-061, but that did not prevent the condition reported in CAR 11-028 from occurring.

During the current investigation, the SPM Team Lead in the Project Office stated that he was aware that quarterly repeat reviews were not being performed for Hanford BDRs, but considered this to be acceptable, because he also was under the impression that the re-reviews were not mandatory until after CCP had become certified at Hanford.

The Action to Prevent Recurrence section of this Corrective Action Plan addresses and resolves the effectiveness issue with the corrective action taken in response to CAR 10-029.

CBFO Form 3.1-2

CAR CONTINUATION SHEET

1. CAR No: 11-028	2. Activity No: A-11-10	3. Page 4 of 4
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Verification:

Closure documentation reviewed:

WTS letter CP:11:01346-UFC:2300.00, CCP Closure Package for CBFO CAR 11-028, Actions 3 and 4 (attachment 3), "Standing Order CCP-SO-061, Revision 1, Quarterly Repeat of DGL Data Review, Validation and Verification Responsibilities, CCP-TP-001." The revised document provides clarification of the requirement for quarterly reviews to commence in the calendar year quarter following the start of characterization activities. The revised Standing Order provides the guidance needed to ensure that repeat reviews of generation-level data are accomplished in a timely manner in the future.

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) *CCP has revised Standing Order CCP-SO-061, which explicitly states that data generation level quarterly repeat reviews are required in the quarter after BDRs are produced at Data Generation Level, prior to certification.*

Verification:

Closure documentation reviewed:

WTS letter CP:11:01346-UFC:2300.00, CCP Closure Package for CBFO CAR 11-028, Actions 3 and 4 (attachment 3), "Standing Order CCP-SO-061, Revision 1, Quarterly Repeat of DGL Data Review, Validation and Verification Responsibilities, CCP-TP-001." The revised document provides clarification of the requirement for quarterly reviews to commence in the calendar year quarter following the start of characterization activities. The revised Standing Order provides the guidance needed to ensure that repeat reviews of generation-level data are accomplished in a timely manner in the future.

ACCEPTANCE

The proposed corrective actions for this CAR were accepted based upon WTS providing documentation that would ensure that repeat reviews of generation-level data would be specific to selected waste containers. The closure documentation submitted provided the necessary detail. Based on the detailed review of Actions 1 – 4 (attachments 1-3) of the URS/WTS closure package, it is recommended that CAR 11-028 be closed.

Response Evaluated By:


Earl Bradford

5/26/11
Date