



Department of Energy
Carlsbad Field Office
P. O. Box 3090
Carlsbad, New Mexico 88221
July 1, 2011



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

Subject: Review and Verification of the Corrective Actions Submitted in Response to CBFO
CAR 11-043, Identified During Audit A-11-14, INL/CCP Characterization Activities

Dear Mr. Ploetz:

Enclosed are the results of the Carlsbad Field Office (CBFO) review and verification of the corrective actions submitted in response to CBFO Corrective Action Report (CAR) 11-043, which resulted from CBFO Audit A-11-014 of the Idaho National Laboratory Central Characterization Project Characterization and Certification Activities. The results of the verification are documented on the enclosed CAR Continuation Sheets, which indicate that the associated corrective actions have been fulfilled. CAR 11-043 is considered closed.

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

Sincerely,

Dennis S. Miehls
Senior Quality Assurance Specialist

Enclosure



Mr. David Ploetz

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cc: w/enclosure

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P. Hinojos, CTAC	ED
G. White, CTAC	ED
P. Martinez, CTAC	ED
WIPP Operating Record	ED
CBFO QA File	ED
CBFO M&RC	ED

*ED denotes electronic distribution

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CAR CONTINUATION SHEET

1. CAR No: 11-043

2. Activity No: A-11-14

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Block # 17: Acceptance of Corrective Action Completion:

CBFO performed an evaluation of the evidence supporting completion of the corrective actions associated with CBFO Corrective Action Report (CAR) 11-043, identified during CBFO Audit A-11-14. The evidence was submitted via URS memorandum CP:11:01465, UFC:2300.00, dated July 1, 2011, from Mr. D. K. Ploetz, Manager, Central Characterization Project Retrieval, Characterization and Transportation, to Mr. D. S. Miehl, Senior Quality Assurance Specialist, Carlsbad Field Office. The methods used to verify completion of the actions contained in the approved corrective action plan (CAP) are described below.

The CAP was submitted via URS memorandum CP:11:01462, UFC:2300.00, dated June 30, 2011, from Mr. D. K. Ploetz, Manager, Central Characterization Project Retrieval, Characterization and Transportation, to Mr. D. S. Miehl, Senior Quality Assurance Specialist, Carlsbad Field Office.

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 actions in response to the CAR condition:

- a) *CCP has verified that, in accordance with CCP-QP-008, the source documents identified in the INL AK Summary Reports listed in the CAR, along with their associated Attachment 3 forms, are now available in CCP Records.*
- b) *CCP has performed a 100% review for the presence, in CCP Records, of source documents and Attachment 3 forms for 22 issued INL Contact-Handled (CH) AK Summary Reports and 10 issued INL Remote-Handled (RH) AK Summary Reports. The review showed that, at the start of the CCP investigation in response to the CAR:*
 - *Ninety-eight percent (98%) (3455/3526) of the source documents listed in the 22 CH AK Summary Reports were available in CCP Records (with their associated Attachment 3 forms). See the enclosed Table 1 for details. In all cases, the documentation was available; it was just that the documentation had not yet been submitted to CCP Records. As of June 30, 2011, 100% of the source documents and Attachment 3 forms for INL are in CCP Records.*
 - *Ninety-six percent (96%) (2229/2315) of the source documents listed in the 10 RH AK Summary Reports were available in CCP Records (with their associated Attachment 3 forms). See the enclosed Table 1 for details. As with CH, the RH documentation was available; it was just that the documentation had not yet been submitted to CCP Records. As of June 30, 2011, 100% of the source documents and Attachment 3 forms for INL are in CCP Records.*
- c) *As noted in the Extent section of this Corrective Action Plan, CCP has conducted a sample check for the presence, in CCP Records, of AK source documents and Attachment 3 forms for completed AK Summary Reports applicable to waste streams at other CCP Host locations. See the enclosed Table 2 for details.*

Verification:

- a) The CAR Verification Team verified that corrective actions associated with the conditions adverse to quality contained in the CAR were implemented, through review of the AK records referenced in Table 3 of this closure package. The team verified the records were in the CCP Records Center.
- b) The CAR Verification Team verified that the 22 INL CH AK Summary Reports and the 10 INL RH AK Summary Reports, along with their associated Source Documents and Attachments (which are listed in Table 1 of this CAR closure package) were located in the CCP Records Center. In addition, the CAR Verification Team randomly selected Source Documents from the AK Summary Reports listed in Table 1, to confirm that the required Source Documents and associated Attachments were in the CCP Records Center.
- c) The CAR Verification Team verified that other AK Summary Reports, AK Source Documents, and related Attachments, from other CCP Host locations listed in Table 2 of the approved CAP, were located in the CCP Records Center.

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CAR CONTINUATION SHEET

1. CAR No: 11-043

2. Activity No: A-11-14

3. Page 2 of 2.

INVESTIGATIVE ACTIONS

Investigative actions were approved as referenced in CBFO memo CBFO:OOA:DSM:MAG:11-0621:UFC 2300.00.

ROOT CAUSE

Root Cause Determination was approved as referenced in CBFO memo CBFO:OOA:DSM:MAG:11-0621:UFC 2300.00.

ACTIONS TO PREVENT RECURRENCE

Action 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 CCP-TP-005 to clarify and better define the AK auditable record, distinguish between AK information and source documents and corresponding submittal requirements to CCP Records, and to explicitly allow documents to be submitted in either hard copy or electronic format (as provided for in CCP-QP-008). The revision establishes the timing criteria for submittal of AK source documents and associated Attachment 3 forms to CCP Records.*
- b) *CCP will brief the AK Experts on the revision to CCP-TP-005.*

Verification

- a) The CAR Verification Team verified that CCP-TP-005 was revised to clarify and define the AK auditable record. The revision also provides a timeline as to when the auditable records will be turned over to the CCP Records Center.
- b) The CAR Verification Team reviewed the briefing slides to ensure that the AKEs were being advised of the new changes to CCP-TP-005. Confirmation emails were provided to the CAR Verification Team to document participation in the briefing. Three individuals were unable to participate in the briefing. CCP sent these individuals an email informing them that they are to discontinue work until they have attended the briefing.

Janara D. Bowden for
Verification Performed By:
CAR Verification Team
CBFO Technical Assistance Contractor

July 1, 2011
Date