



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

JUL 7 2011



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

Subject: Evaluation of the CAP for CAR 11-036 Resulting From Audit A-11-11

Dear Mr. Ploetz:

The Carlsbad Field Office (CBFO) performed Audit A-11-11 of the Los Alamos National Laboratory Central Characterization Project on May 17-19, 2011. CBFO Corrective Action Report (CAR) 11-036 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 11-036. 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 11-036 is acceptable, as documented in the CAP evaluation.

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

Sincerely,

Dennis S. Miehls
 Senior Quality Assurance Specialist

Enclosure

cc: w/enclosure
 R. Unger, CBFO
 M. Navarrete, CBFO
 N. Castaneda, CBFO
 V. Cannon, WTS/CCP
 A. J. Fisher, WTS/CCP
 I. Quintana, WTS/CCP
 M. Walker, WTS/CCP
 Y. Salmon, WTS/CCP
 J. Hoff, WTS
 M. Mullins, WTS
 G. Rael, LASO
 L. Bishop, LASO
 T. Peake, EPA
 M. Eagle, EPA
 E. Felcorn, EPA
 R. Joglekar, EPA

*ED	S. Ghose, EPA	ED
ED	R. Lee, EPA	ED
ED	J. Kieling, NMED	ED
ED	S. Holmes, NMED	ED
ED	T. Kesterson, DOE OB WIPP NMED	ED
ED	D. Winters, DNFSB	ED
ED	P. Gilbert, LANL-CO	ED
ED	G. Lyshik, LANL-CO	ED
ED	P. Hinojos, CTAC	ED
ED	G. White, CTAC	ED
ED	T. Bowden, CTAC	ED
ED	P. Martinez, CTAC	ED
ED	G. Knox, CTAC	ED
ED	WIPP Operating Record	ED
ED	CBFO QA File	
ED	CBFO M&RC	
	*ED denotes electronic dist	



CBFO Form 3.1-2

CAR CONTINUATION SHEET

1. CAR No: 11-036

2. Activity No: A-11-11

3. Page 1 of 2.

Block # 16 Acceptance of Proposed Corrective Action

The following is the evaluation of the proposed Corrective Action Plan (CAP) for CBFO CAR 11-036 submitted via URS/Washington TRU Solutions letter CP:11:01450 UFC:2300.00, dated June 22, 2011, from D. K. Ploetz to Mr. Dennis S. Miehl. Italicized text, taken verbatim from the CAP, is used to show the correlation between the proposed corrective actions and the method used for evaluation.

REMEDIAL ACTIONS:

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

- a) *As noted in the Extent section of this Corrective Action Plan, only two other Headspace Gas (HSG) sampling BDRs have been issued at LANL during the past twelve months. CCP has reviewed these two BDRs and there were no other occurrences. The event was isolated.*
- b) *CCP has revised the information in BDR LAHSG1101, which is now correct and up-to-date.*

Evaluation:

Review of the proposed CAP associated with Remedial Actions submitted by the above referenced letter determined that the proposed remedial actions are acceptable.

INVESTIGATIVE ACTIONS:

The CCP investigation revealed that when the operator was preparing to implement the disposition for NCR-LANL-0506-11, to correct Container Age discrepancies for three containers, she did not retrieve the hard copy Sample Container Data Form from BDR LAHSG1101 in order to make pen-and-ink changes to the existing data. Rather, she obtained an electronic copy of the form and corrected the entries for the three containers identified in NCR-LANL-0506-11. The operator failed to notice that the electronic version of the form that she retrieved did not contain exactly the same Container Age information as the one that was originally printed out and inserted into the BDR in hard copy. So, although the NCR disposition was implemented correctly, other errors were inadvertently introduced into the Sample Container Data Form, as reported in the CAR condition. The errors were not detected by the ITR or SPM because they were focused on the specific changes directed by NCR-LANL-0506-11, which were correctly incorporated. If the operator had obtained a hard copy of the original Sample Container Data Form from the BDR, and made pen-and-ink changes to the three incorrect entries, there would have been no opportunity to introduce additional errors.

Because the operator was recreating the Sample Container Data Form, she made the incorrect assumption that it was appropriate to use the same date as the one that appeared on the original form (even though she changed three of the entries). Following discovery of the CAR condition, CCP senior management met with the operators and others involved in the review of BDR LAHSG1101 and strongly reiterated the requirement that documents must be dated that same day that they are signed.

Extent

During the past twelve months, only two other Headspace Gas (HSG) sampling BDRs were issued at LANL. CCP has reviewed these two BDRs and there were no other occurrences. The event was isolated.

CBFO Form 3.1-2

CAR CONTINUATION SHEET

1. CAR No: 11-036

2. Activity No: A-11-11

3. Page 2 of 2.

Impact

The purpose of the "Container Age" information in the Sample Container Data Form (Column 5) is to ensure that the minimum "Permit-Required Equilibrium Time (Days)" (Column 4) has elapsed before HSG sampling is performed. In all cases, the Permit-required Container Ages were met. There was no technical impact from the reported condition.

Evaluation:

Review of the proposed CAP associated with the Investigative Actions submitted by the above referenced letter determined that the Investigative Actions are acceptable.

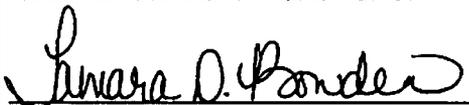
ACTIONS TO PREVENT RECURRENCE:

- a) CCP has a software tool for calculating the number of calendar days between a given start date and a given finish date. The software has been verified and validated in accordance with CCP-QP-022, CCP Software Quality Assurance Plan, and is currently in use for making the calculation for Flammable Gas Analysis for Transportation. CCP has provided the same software to HSG operators to assist them in correctly determining the number of calendar days since, for example, the date a container was first vented.
- b) CCP will issue a Lessons Learned addressing the CAR condition, reinforcing the requirement that QA records must be dated the same day that they are signed. The Lessons Learned will also address the practice of recreating an entire form rather than obtaining the original from the BDR and making pen-and-ink changes. The preferred method is by pen-and-ink change; if the changes are extensive, and the entire form is to be recreated, people have to understand that a complete review of all data is required.

Evaluation:

Review of the proposed CAP associated with the Actions to Prevent Recurrence submitted by the above referenced letter determined that the Actions to Prevent Recurrence are acceptable.

The proposed CAP for remedial actions, investigative actions, and actions to prevent recurrence is acceptable. It is recommended that the CAP for CAR 11-036 be approved.



Evaluated By: Tamara D. Bowden

07/06/11

Date