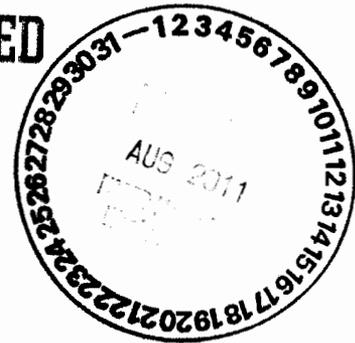




ENTERED

Department of Energy
Carlsbad Field Office
P. O. Box 3090
Carlsbad, New Mexico 88221
AUG - 5 2011



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

Subject: Evaluation of the Documentation Supporting Closure of CAR 11-036 from
Recertification Audit A-11-11, LANL/CCP

Dear Mr. Ploetz:

The results of the Carlsbad Field Office evaluation of the documentation supporting completion
of the corrective actions associated with Corrective Action Report (CAR) 11-036, identified
during the Los Alamos National Laboratory Central Characterization Project (LANL/CCP)
Recertification Audit A-11-11, are documented on the enclosed CAR Continuation Sheet.
Corrective actions have been verified and determined to be adequate for precluding recurrence.
Accordingly, CAR 11-036 is considered closed.

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

Sincerely,

[Handwritten signature of Dennis S. Miehl]

Dennis S. Miehl
Senior Quality Assurance Specialist

Enclosure

cc: w/enclosure
R. Unger, CBFO
J.R. Stroble, CBFO
M. Navarrete, CBFO
N. Castaneda, CBFO
V. Cannon, WTS/CCP
A. J. Fisher, WTS/CCP
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ED G. Knox, CTAC ED
ED R. Allen, CTAC ED
ED T. Bowden, CTAC ED
ED M. Lin, CTAC ED
ED M. Mager, CTAC ED
ED WIPP Operating Record ED
ED CBFO QA File
ED CBFO M&RC
ED \*ED denotes electronic distribution



CBFO Form 3.1-2

### CAR CONTINUATION SHEET

1. CAR No: 11-036	2. Activity No: A-11-11	3. Page <u>1</u> of <u>2</u>
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The Carlsbad Field Office (CBFO) has reviewed the Corrective Action Report (CAR) 11-036 closure package, including objective evidence and supporting documentation submitted via URS letter CP:11:01481 UFC:2300.00, D. K. Ploetz to Dennis S. Miehs, "TRANSMITTAL OF DOCUMENTATION SUPPORTING COMPLETION OF CORRECTIVE ACTIONS ASSOCIATED WITH CBFO CORRECTIVE ACTION REPORT 11-036."

*Italicized text, taken verbatim from the Corrective Action Plan, 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) *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.*

Verification:

- a) Verified through email documentation that Central Characterization Project (CCP) personnel reviewed the two Batch Data Reports (BDRs) and no additional errors were found.
- b) Verified that BDR LAHSG1101 has been revised through review of revised pages.

**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.*

CBFO Form 3.1-2

### CAR CONTINUATION SHEET

1. CAR No: 11-036

2. Activity No: A-11-11

3. Page 2 of 2.

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.*

Impact

*The purpose of the "Container Age" information in the Sample Container Data Form (Column 5) is to ensure that 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.*

Verification:

Investigative actions were approved as referenced in CBFO memo CBFO:OQA:DSM:MAG:11-0626:UFC 2300.00.

**ACTIONS TO PREVENT RECURRENCE:**

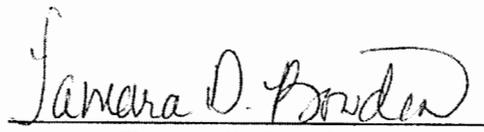
- a) *CCP has a software tool for calculating the number of calendar days between a given start date and a given finish date. The software has been verified and validated in accordance with CCP-QP-022, CCP Software Quality Assurance Plan, and is currently in use for making the calculation for Flammable 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.*

Verification:

- a) *Verified an email directing all Headspace Gas Operators to use the Flammable Gas Analysis Attachments spreadsheet to double-check the drum age of the containers.*
- b) *Verified CCP Lessons Learned 2011-09, Preferred Method for Making Corrections to Data Entries in CCP Records, and the Requirement to Date Records the Same Day They Are Signed, was provided to all Operators, Site Project Managers, and Vendor Project Managers on July 6, 2011.*

Based on the results of the review of the objective evidence included in the CAR 11-036 package, it is recommended that CAR 11-036 be closed.

Verification Performed By:

  
Tamara D. Bowden

07/25/11  
Date