



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

SEP 08 2011



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

Subject: Evaluation of the CAP for CAR 11-045 from Audit A-11-23

Dear Mr. Ploetz:

The Carlsbad Field Office review and evaluation of the Corrective Action Plan (CAP) dated August 16, 2011 for Corrective Action Report (CAR) 11-045 has been completed and is documented on the enclosed CAR Continuation Sheet. The evaluation results conclude that the CAP for CAR 11-045 is acceptable.

Acceptance of the CAP is contingent upon completion of all corrective action activities by September 9, 2011. Upon completion of all corrective actions, and in accordance with your proposed schedule, please provide supporting documentation as evidence of completion so that verification activities may be performed.

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

Sincerely,

Courtland G. Fesmire, P.E.
 Quality Assurance Engineer

Enclosure

| | | | |
|------------------------|----|--------------------------------|----|
| cc: w/enclosure | | | |
| R. Unger, CBFO | ED | R. Joglekar, EPA | ED |
| J. R. Stroble, CBFO | ED | S. Ghose, EPA | ED |
| T. Morgan, CBFO | ED | R. Lee, EPA | ED |
| M. Sensibaugh, WTS/CCP | ED | J. Kieling, NMED | ED |
| V. Cannon, WTS/CCP | ED | T. Hall, NMED | ED |
| A. J. Fisher, WTS/CCP | ED | S. Holmes, NMED | ED |
| I. Quintana, WTS/CCP | ED | T. Kesterson, DOE OB WIPP NMED | ED |
| M. Walker, WTS/CCP | ED | D. Winters, DNFSB | ED |
| Y. Salmon, WTS/CCP | ED | P. Gilbert, LANL-CO | ED |
| J. Carter, WTS/CCP | ED | G. Lyshik, LANL-CO | ED |
| J. Hoff, WTS | ED | P. Hinojos, CTAC | ED |
| M. Mullins, WTS | ED | G. White, CTAC | ED |
| J. Todd, DOE-SNL | ED | C. Castillo, CTAC | ED |
| T. Peake, EPA | ED | WIPP Operating Record | ED |
| M. Eagle, EPA | ED | CBFO QA File | |
| E. Felcorn, EPA | ED | CBFO M&RC | |

*ED denotes electronic distribution



CBFO Form 3.1-2

CAR CONTINUATION SHEET

1. CAR No: 11-045

2. Activity No: A-11-23

3. Page 1 of 2**Block # 16 Acceptance of Proposed Corrective Action Plan**

An evaluation was performed of the proposed corrective actions detailed in the corrective action plan (CAP) developed in response to Carlsbad Field Office (CBFO) Corrective Action Report (CAR) 11-045. The CAP was submitted via letter dated August 16, 2011, from Mr. D.K. Ploetz, Manager, Central Characterization Project, Retrieval, Characterization and Transportation, to Mr. Randy Unger, Quality Assurance Director, Carlsbad Field Office. 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

In accordance with the CBFO direction for the CAR, the Central Characterization Project (CCP) has addressed Remedial Actions, Investigative Actions, Root Cause Determination and Actions to Prevent Recurrence.

CCP has corrected the COC form to round ambient pressure to the nearest whole number, to identify the location where the sample was taken ("under the lid"), and to delete the reference to the waste stream identification number from the entry for the field blank.

Evaluation:

A review of the proposed CAP associated with Remedial Actions has determined that the proposed corrective actions are acceptable.

INVESTIGATIVE ACTIONS*Extent*

Batch Data Report (BDR) SNHSG1101 is the only HSG sampling BDR produced by CCP for Sandia. The extent is limited to the conditions stated in the CAR.

Impact

There is no technical impact from the reported condition: the round-of difference between 24.6 inches of Hg and 25 inches Hg is inconsequential' the sample was taken from the correct location (under the lid), and the extraneous waste stream entry for the field blank had no effect on data quality (the fact that the "Container ID" block showed "N/A" made it clear that this was the field blank).

Evaluation:

A review of the proposed CAP associated with Investigative Actions has determined that the proposed corrective actions are acceptable.

ROOT CAUSE

Not Required

ACTIONS TO PRECLUDE RECURRENCE

The operator who made the incorrect entries, and the ITR who reviewed the GBDR and failed to notice the errors, are both experienced CCP workers who are familiar with the requirements and have good performance records. When interviewed, neither had an explanation, other than they simply weren't paying enough attention. Under these circumstances (isolated case, experienced personnel with good performance records, no technical impact), there are no programmatic actions to be taken. For this reason, CCP has determined that the following actions are adequate to resolve the CAR condition"

CBFO Form 3.1-2

CAR CONTINUATION SHEET

1. CAR No: 11-045

2. Activity No: A-11-23

3. Page 2 of 2

- a) CCP will brief the responsible HSG personnel (operational and ITR) on the correct method for completing the HSG sampling COC form.
- b) CCP will redistribute Lessons Learned 207-14, Compliance with Procedures and Attention to Detail, to the responsible HSG personnel (operator and ITR) as required reading.

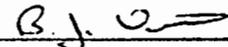
Evaluation:

A review of the proposed CAP associated with Actions to Preclude Recurrence has determined that the proposed corrective actions are acceptable.

ACCEPTANCE

The results of the CAP evaluation indicate that the proposed CAP adequately details the remedial actions taken, the results of investigative actions, and the proposed corrective actions to preclude recurrence. This acceptance is contingent upon completion of all corrective action activities by September 9, 2011. Therefore, it is recommended that the proposed CAP for CAR 11-045 be approved.

Response Evaluated By:



B.J. Verret
CBFO Technical Assistance Contractor

8/18/11
Date