



Department of Energy
Carlsbad Field Office
P. O. Box 3090
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OCT 4 2011



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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 11-042 from Audit A-11-14

Dear Mr. Ploetz:

The Carlsbad Field Office (CBFO) performed Audit A-11-14 of the Idaho National Laboratory Central Characterization Project June 7 – 9, 2011. CBFO Corrective Action Report (CAR) 11-042 was issued as a result of that audit.

The results of the CBFO review and evaluation of the Washington TRU Solutions proposed Corrective Action Plan (CAP) for CAR 11-042 are documented on the enclosed CAR Continuation Sheets. The results of the review indicate that the CAP for CAR 11-042 is acceptable. Upon completion of all corrective actions, please provide notification and documentation supporting closure so that verification activities may be performed.

If you have any questions or concerns regarding this evaluation, please contact me at (575) 234-7548.

Sincerely,

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

Enclosure



Mr. D. K. Ploetz

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OCT 4 2011

cc: w/enclosure
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CBFO M&RC

*ED denotes electronic distribution

CBFO Form 3.1-2

CAR CONTINUATION SHEET

1. CAR No: 11-042

2. Activity No: A-11-14

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Block 16: Acceptance of Proposed Corrective Actions

An evaluation of the corrective actions detailed in the Corrective Action Plan (CAP) for CAR 11-042 has been completed. The CAP was submitted by URS-WTS letter QA:11:01510 dated July 28, 2011, from D. K. Ploetz, Manager CCP, to Mr. Dennis S. Miehl, CBFO, subject, "Corrective Action Plan for Corrective Action Report 11-042 Resulting From Audit A-11-14 of Idaho National Laboratory Central Characterization Project Activities." Additional documentation was submitted by URS-WTS letter QA:11:01558 dated September 6, 2011, from D. K. Ploetz, Manager CCP, to Mr. Randy Unger, CBFO, subject, "Supplemental Information in Support of the Corrective Action Plan for Corrective Action Report 11-042 Resulting From Audit A-11-14 of Idaho National Laboratory Central Characterization Project Activities."

Italicized text, taken verbatim from the CAP, is used to show the correlation between the corrective action and the evaluation. Note that the actions in the CAP were informally reviewed by CBFO and found to be acceptable.

REMEDIAL ACTIONS

CCP has determined that no remedial actions are appropriate for the CAR condition.

Evaluation:

Review of the proposed CAP associated with Remedial Actions and supplemental information provided by the above referenced letters determined that no remedial actions are required.

INVESTIGATIVE ACTIONS

In discussions subsequent to issuance of the CAR, CBFO has clarified the condition statement in the CAR. The condition adverse to quality is that AKE personnel were involved in CCP RH AK Reports by signing attachments such as Attachment 3 forms for source documents. The condition Statement was not meant to imply that non-RH qualified AKEs had prepared or approved RH AK Summary Reports at INL. The Corrective Action Plan was developed on the basis of this understanding.

Currently, all AKEs are trained and qualified in accordance with a "unified" qualification card that incorporates the requirements for both CH and RH waste streams. At the time the activities cited in the CAR condition were performed, there was a core qualification card for the AKE position, with a separate RH addendum. The investigation evaluated conditions at the time the work was done, and the description in this section of the Corrective Action Plan is based on the way the program was being administered then.

Extent

Two AKEs who had not yet received the RH addendum training (which includes the RH TRU WCPIP) signed RH AK attachments at INL, and one of these same two AKEs also signed RH AK attachments for one RH waste stream at SNL.

Impact

For reasons provided in the Root Cause Determination section of this Corrective Action Plan, AKEs were qualified to prepare and sign AK attachments on the basis of their core qualification to the position: the additional training from the RH addendum was not required. There is no impact from this compliant activity, either at INL or at SNL.

Evaluation:

Review of the proposed CAP and supplemental information provided by the above referenced letters determined that Investigative Actions are acceptable.

ROOT CAUSE DETERMINATION

Qualification and training of Acceptable Knowledge Experts has undergone an evolution over the time-history of CCP. For several years after its inception, CCP characterization activities were limited to Contact-Handled (CH) TRU waste. As a consequence, the AKE qualification card made no distinction between CH and RH waste streams: everything was CH.

CBFO Form 3.1-2

CAR CONTINUATION SHEET

1. CAR No: 11-042

2. Activity No: A-11-14

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Around the year 2005, CBFO directed CCP to expand its scope to include characterization and shipment of RH TRU waste streams. By February 2006, CCP Training had developed and was using an RH addendum to the core AKE qualification card: the addendum included the WCP/IP. The core qualification card qualified an AKE for the functions of the AKE position, and included the WAP and the TRU Waste Acceptance Criteria for the WIPP; the RH addendum, which included the WCP/IP as required reading, qualified an AKE for preparation of RH AK Summary Reports for RH waste streams.

The gathering of source documents and the preparation of Attachment 3 forms has always been a one of the core functions of the AKE position. CCP-TP-005, Revision 18, was the version in force at the time the activities referred to in the CAR condition were performed. Section 3.2.1 lists the following as a responsibility of the AKE position: "Identifies, locates, compiles documents ..." The attachments in CCP-TP-005 that are used for identifying, locating, and compiling source documents are not CH or RH specific: e.g., there is only one Attachment 3 form and it is used for source documents for both CH and RH waste streams.

The CAR condition as clarified by CBFO was not a violation of any requirement, since the activities performed by the AKE's were within the scope of their existing core qualifications and CCP-TP-005, the implementing procedure. Since that time, CCP has unified the CH and RH training requirements into a single AKE qualification card for the position.

Evaluation:

Review of the proposed CAP and supplemental information provided by the above referenced letters determined that the Root Cause Determination is acceptable.

ACTIONS TO PREVENT RECURRENCE

Although not a result of the CAR condition (the AKE qualification card was changed before the CAR was written), CCP considers that the following process improvement simplifies the qualification process for the AKE position:

- a) *Qualification of all AKE personnel has been redone in accordance with a "unified" qualification card that incorporates the requirements for both CH and RH TRU waste streams. This qualification activity, using AKE-01, Revision 7, was completed for all AKE personnel on June 30, 2011.*

Evaluation:

Review of the proposed CAP and supplemental information provided by the above referenced letters concluded that the proposed corrective actions to prevent recurrence are adequate and acceptable. It is recommended that the CAP be accepted.

Evaluation performed by:



Randall Allen

9/27/11
Date