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

OCT 4 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: Issuance of CAR 11-051 Identified During Surveillance S-11-25, CCP AK Records

Dear Mr. Ploetz:

The Carlsbad Field Office performed Surveillance S-11-25 of the Central Characterization Project (CCP) Acceptable Knowledge (AK) Records on September 20-22, 2011. Enclosed is Corrective Action Report (CAR) 11-051 addressing the conditions adverse to quality identified during the surveillance.

Please provide a documented response for the CAR, ensuring that the required actions indicated in Block 12 are addressed, including a schedule for completion of the corrective actions. Please return your response to me on or before the due date identified in Block 14a of the CAR.

If you have any questions concerning CAR 11-051, please contact me at (575) 234-7548.

Sincerely,

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

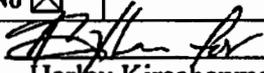
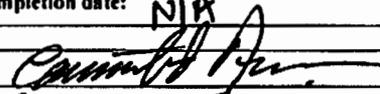
Enclosure

cc: w/enclosure			
R. Unger, CBFO	*ED	R. Lee, EPA	ED
J. R. Stroble, CBFO	ED	J. Kieling, NMED	ED
M. Sensibaugh, WTS/CCP	ED	S. Holmes, NMED	ED
V. Cannon, WTS/CCP	ED	T. Hall, NMED	ED
A. J. Fisher, 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
T. Peake, EPA	ED	C. Riggs, CTAC	ED
M. Eagle, EPA	ED	WIPP Operating Record	ED
E. Feltcorn, EPA	ED	CBFO QA File	
R. Joglekar, EPA	ED	CBFO M&RC	
S. Ghose, EPA	ED	*ED denotes electronic distribution	



CBFO Form 3.1-1\_

**CORRECTIVE ACTION REPORT**

1. CAR No.: <b>11-051</b>		2. Activity Report No.: <b>S-11-25</b>		3. Page 1 of 1	
4. Controlling document: <b>CCP-QP-008</b>		5. CBFO Assessment Team Leader: <b>Courtland Fesmire</b>			
6. Responsible organization: <b>CCP</b>		7. CAQ was discussed with: <b>Sheila Percy</b>			
8. Requirement that was violated: <b>See Continuation Sheet.</b>					
9. Condition Adverse to Quality (CAQ): <b>See Continuation Sheet.</b>					
10. Suggested actions (Optional):					
11a. Significant CAQ? (If 'Yes', go to block 15b)		Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>		12. Type of actions required:	
11b. Work Suspension recommended? ( If 'Yes', go to block 15b)		Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>		Remedial? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
11c. RCRA related?		Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>		Investigative? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
11d. Accelerated corrective action required? ( If 'Yes', go to block 15b)		Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>		Root Cause Determination? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
11e. Does this CAQ affect waste streams BNINW216 or BNIN218?		Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>		Actions to Preclude Recurrence? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
13a. Trend Code: <b>RM-07</b>		13b. CAR Initiator:  (printed name) <b>Harley Kirschenmann</b>		Date: <b>9/29/11</b>	
14a. Response due date: <b>4 Nov 2011</b>					
14b. Required corrective action completion date: <b>N/A</b>					
15. Concurrence:					
a. Assessment Team Leader:		 (printed name) <b>COURTLAND FESMIRE</b>		Date: <b>4 Oct 2011</b>	
b. CBFO Quality Assurance Director (if SCAQ, work suspension, or accelerated corrective action, sign here; otherwise, mark as N/A):		<b>N/A</b> (printed name)		Date: _____	
16. Acceptance of Proposed Corrective Actions: _____ Date: _____ (printed name)					
17. Acceptance of Corrective Action Completion: _____ Date: _____ (printed name)					
18. Closure: _____ Date: _____ (printed name)					

CBFO Form 3.1-2

**CAR CONTINUATION SHEET**

1. CAR No: 11-051

2. Activity No: S-11-25

3. Page 1 of 1.**Block # 8, Requirement that was violated:**

CCP-QP-008, Rev. 19, CCP Records Management

- a) Para. 3.4.4: CCP Records Custodian verifies that CCP records are complete.
- b) Para. 3.5.2: Facility Records Custodian verifies that CCP records are complete.
- c) Para. 3.7.1: CCP personnel generates the necessary records that document the activities assigned to them. Each individual who creates records must verify the record(s) are legible, accurate, and complete, appropriate to the work accomplished.

**Block # 9, Condition Adverse to Quality (CAQ):**

Lack of attention to detail when processing Acceptable Knowledge (AK) documentation:

## 1. CCP-AK-INL-005, Rev. 5

- a) Source document P227, Plutonium Mass Fractions Derived From SGRS Data, records file is missing page 1.
- b) The AK Summary Report lists two entries for source document P052, each identifying a different source document: Backlog Waste Reassessment Baseline Book, Organics WF19 and Backlog Waste Reassessment Baseline Book, Solidified Organics WF47.

## 2. CCP-AK-INL-018, Rev. 1

- a) Attachment 3 documentation (referring to Acceptable Knowledge Source Document Summary, Attachment 3 to CCP-TP-005, *CCP Acceptable Knowledge Documentation*) for source documents C098 and C099 are available in the Records Center but these source documents are not listed on the AK Summary Report.
- b) Attachment 3 identifies the date of source document C111 as 1/7/2004, the record file copy is dated 11/29/2004, and the AK Summary Report identifies the date as 7/20/2004.
- c) Source document P073 is identified as "Expert Review of SGS Data, WCP-41, Rev. 1, 1/07/2004" on the AK Summary Report and as "WIC-31, Rev. 3, 7/28/09" on Attachment 3.
- d) The AK Summary Report identifies the source document P001 as "Transuranic Waste Baseline Inventory Report Database, Rev. 2.1," dated 1/1/2003. However, the electronic file document is "WTWBIR WS ID LL-T002," dated 3/24/2004. Also, WS ID LL-T002 is not identified on the CH Waste Stream listing used by the Records Center.

## 3. CCP-AK-INL-023, Rev. 0

- a) Attachment 3 identifies source document C009 author (Davis) and date (12/6/06) but the source document in the records file has no such information and is not marked as C009.
- b) Source document C014 is identified as C012 in the records file.
- c) Source documents D002 and DR001 are not identified with their source document numbers.
- d) Submittals to the electronic records database for source documents C007, C011, and C012 included an Attachment 3 for the same waste stream, but at another site (LA-OS-00-05). A correct copy of each Attachment 3 is in the hard copy files in the Records Center.