



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



MAR - 7 2012



Mr. M. L. Sensibaugh, Manager  
Central Characterization Project  
Retrieval, Characterization, and Transportation  
Washington TRU Solutions, LLC  
P.O. Box 2078  
Carlsbad, NM 88221-2078

Subject: Evaluation of the Documentation Supporting Closure of CAR 12-002  
Resulting From Audit A-12-02, SRS/CCP TRU Waste Characterization  
and Certification Activities

Dear Mr. Sensibaugh:

The Carlsbad Field Office (CBFO) has evaluated the documentation supporting completion of the corrective actions associated with Corrective Action Report (CAR) 12-002, resulting from CBFO Audit A-12-02, Savannah River Site Central Characterization Project (SRS/CCP) Transuranic Waste Characterization and Certification Activities. Results of the evaluation are documented on the enclosed CAR Continuation Sheet. Corrective actions have been verified and determined to be adequate for precluding recurrence of the conditions adverse to quality identified in the CAR. Accordingly, CAR 12-002 is considered closed.

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

Sincerely,

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

Enclosure



Mr. M. L. Sensibaugh

-2-

MAR - 7 2012

cc: w/enclosure

|                           |     |
|---------------------------|-----|
| R. Unger, CBFO            | *ED |
| J. R. Stroble, CBFO       | ED  |
| T. Morgan, CBFO           | ED  |
| M. Pinzel, CBFO           | ED  |
| N. Castaneda, CBFO        | ED  |
| V. Cannon, WTS/CCP        | ED  |
| A. J. Fisher, WTS/CCP     | ED  |
| I. Quintana, WTS/CCP      | ED  |
| M. Walker, WTS/CCP        | ED  |
| Y. Salmon, WTS/CCP        | ED  |
| J. Carter, WTS/CCP        | ED  |
| J. Hoff, WTS              | ED  |
| M. A. Mullins, WTS        | ED  |
| H. Crapse, DOE-SR         | ED  |
| T. Peake, EPA             | ED  |
| E. Feltcorn, EPA          | ED  |
| R. Joglekar, EPA          | ED  |
| S. Ghose, EPA             | ED  |
| R. Lee, EPA               | ED  |
| M. Eagle, EPA             | ED  |
| J. Kieling, NMED          | ED  |
| T. Kliphuis, NMED         | ED  |
| S. Holmes, NMED           | ED  |
| T. Hall, NMED             | ED  |
| R. Maestas, NMED          | ED  |
| T. Kesterson, NMED/DOE OB | ED  |
| J. Marple, NMED/DOE OB    | ED  |
| D. Winters, DNFSB         | ED  |
| P. Gilbert, LANL-CO       | ED  |
| G. Lyshik, LANL-CO        | ED  |
| P. Y. Martinez, CTAC      | ED  |
| P. Hinojos, CTAC          | ED  |
| G. White, CTAC            | ED  |
| WIPP Operating Records    | ED  |

CBFO QA File

CBFO M&RC

\*ED denotes electronic distribution

1. CAR No: 12-002

2. Activity No: A-12-02

3. Page 1 of 3

**Block # 17 Acceptance of Corrective Action Completion:**

The Carlsbad Field Office (CBFO) has reviewed the Corrective Action Report (CAR) 12-002 closure package, including objective evidence and supporting documentation submitted via URS letter CP:12:01117 UFC:2300.00, M. L. Sensibaugh to Courtland G. Fesmire, P.E., subject: "TRANSMITTAL OF DOCUMENTATION SUPPORTING COMPLETION OF CORRECTIVE ACTIONS ASSOCIATED WITH CBFO CORRECTIVE ACTION REPORT 12-002."

*Italicized text, taken verbatim from the Corrective Action Plan (CAP), is used to show the correlation between the corrective action and the method used for verification.*

**REMEDIAL ACTIONS**

*In response to the CAR condition, CCP has taken the following remedial actions:*

- 1) *Question 10 of the SPM checklist for BDR SRNDA1400 was revised to add a reference to NCR-SRS-1099-07 [Complete: November 16, 2011]*
- 2) *The ITR checklist for RTR for BDR SRLBR0008 was revised to add the procedure number and revision information in Block 2, following verification that CCP-TP-053, Revision 10, was correct [Complete: November 17, 2011]*
- 3) *The Waste Stream Profile Form numbers for WSPF #SR-MD-Soil and WSPF #SRW027-HBL-BOX have been corrected [Complete: November 17, 2011]*

**Verification:**

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

- 1) *A copy of the SPM checklist for BDR SRNDA1400, was reference to NCR-SRS-1099-07 added to Question 10, is attached as objective evidence.*
- 2) *A copy of the ITR checklist for BDR SRLBR0008, revised to add the procedure and revision number in Block 2, is attached as objective evidence.*
- 3) *A copy of the corrected pages for WSPF #SR-MD-Soil and WSPF #W027-HBL-BOX are attached as objective evidence.*

**INVESTIGATIVE ACTIONS****Extent**

*The three conditions listed in the CAR all stem from human error, and are attributable to inattention to detail. The first one occurred in 2007, and the other two are more recent. There is no practical way to determine the true extent of conditions like these, but as discussed in the Impact section of this Corrective Action Plan, there is a high degree of assurance that any similar conditions also have no significant technical impact.*

**Impact**

*There is no technical impact from the three conditions reported in the CAR:*

- a) *When NCR-SRS-1099-07 was issued in 2007, the SPM made the appropriate changes in BDR SRNDA1400 (correction of trend codes), added the NCR number to the BDR narrative summary, and inserted a copy of the NCR into the BDR package. The NCR itself was processed correctly, with timely disposition. The only thing that the SPM did not do was to update the SPM checklist to show the NCR number. Since the NCR changes were made to the data, and the NCR was inserted into the BDR package, there is no technical impact from the CAR condition.*
- b) *The Attachment 3 form in BDR SRLBR0008 self-identifies the procedure number and the revision level in the header on the form (CCP-TP-053, Revision 10). The only reason for requiring the ITR to write*

1. CAR No: 12-002

2. Activity No: A-12-02

3. Page 2 of 3

*the information in Block 2 is to ensure that a positive action was taken to verify the procedure and revision. As noted in the Remedial Actions section of this Corrective Action Plan, CCP verified the information was the same as reflected in the header and added it to Block 2 of the form.*

- c) All technical information in the two WSPFs was correct and applicable to the intended waste streams. The SPM entered the correct WSPF numbers on the first page of the forms, but neglected to ensure that the WSPF numbers on the attachments were also correct.*

*If there are in fact other cases of similar conditions in CCP documentation, there is a high degree of assurance that they also have no significant technical impact. The CCP program is based on defense-in-depth, with multiple checks designed to ensure that impactful errors are identified and corrected during normal processing. CCP has a proven track record of success in applying controls in a graded fashion, such that areas of highest risk receive the most attention.*

**Evaluation:**

Review of the proposed CAP associated with the Investigative Actions submitted via URS/Washington TRU Solutions LLC letter CP:12:01066 UFC: 2300.00, dated January 17, 2012, from Mr. D. K. Ploetz, Manager, Retrieval, Characterization and Transportation, to Mr. Court Fesmire, CBFO Quality Assurance Engineer, determined that the Investigative Actions are complete and acceptable.

**ROOT CAUSE DETERMINATION**

*The three conditions listed in the CAR all stem from human error, and are attributable to inattention to detail. Any program of the complexity and scope of CCP will inevitably have examples like the ones identified in the CAR.*

**Evaluation:**

Review of the proposed CAP associated with Root Cause Determination submitted via URS/Washington TRU Solutions LLC letter CP:12:01066 UFC: 2300.00 dated January 17, 2012, from Mr. D. K. Ploetz, Manager, Retrieval, Characterization and Transportation, to Mr. Court Fesmire, CBFO Quality Assurance Engineer, determined that the root cause determination is complete and acceptable.

**ACTIONS TO PRECLUDE RECURRENCE**

*Subsequent to the CAR, CBFO expressed a concern that the reported conditions might indicate a decrease in the level of ownership and involvement of lead SPMs in activities at the host locations for which they are responsible. The concern was based on the degree to which the lead SPMs currently rely on other project personnel for review of BDRs and performance of lot evaluations. Although the lead SPMs have always had assistance in getting this work done, the expansion of CCPs scope across the complex has necessitated more sharing of the required reviews and evaluations by supporting project personnel than in the past.*

*CCP believes that the lead SPMs are in fact providing adequate oversight of their assigned host locations, and are appropriately engaged with the work and those performing the work. During recent discussions with CBFO, CCP described several examples of the ways that this is occurring: e.g., since July 2011, the lead SPM for SRS has spent three full weeks at SRS, interacting with SRS management and spending time with CCP personnel and the equipment.*

*It is CCPs view that the conditions reported in the CAR simply reflect the fallibility of human beings; since no complex system is ever perfect, there will always be cases of inattention to detail. The discovery of a few minor errors with no technical impact is not, by itself, a precursor of more significant problems to come.*

1. CAR No: 12-002

2. Activity No: A-12-02

3. Page 3 of 3

CCP agrees with CBFO that it is appropriate to remind SPMs of the importance of their role and their responsibilities as the named function in the Permit for WAP compliance. Accordingly, CCP will take the following actions, to reinforce the duties of the SPM position and the general responsibility of all CCP personnel to pay attention to detail:

4) CCP will include these areas in the next CCP all-hands meeting, currently scheduled to occur by February 16, 2012.

5) CCP will conduct a separate briefing session with the SPMs, to go over

Verification:

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

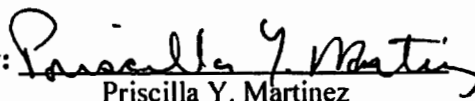
4) A copy of the February 2, 2012, all-hands briefing materials, along with the completed attendance rosters, are attached as objective evidence.

5) A copy of the SPM briefing materials, along with the completed attendance rosters, are attached as objective evidence.

**CONCLUSION:**

Based on the review of the completion documentation submitted, it has been determined that the corrective actions to prevent recurrence of the CAR conditions have been satisfactorily implemented. Therefore, it is recommended that CAR 12-002 be considered closed.

Verification Performed By:

  
Priscilla Y. Martinez

2-22-12

Date