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

MAR 16 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: Issuance of CARs 12-010 and 12-011 from Audit A-12-09 of the Central Characterization Project Quality Assurance Program Activities

Dear Mr. Sensibaugh:

The Carlsbad Field Office (CBFO) performed Audit A-12-09 of the Central Characterization Project Quality Assurance Program Activities March 6 – 8, 2012. Enclosed are CBFO Corrective Action Reports (CARs) 12-010 and 12-011, addressing the conditions adverse to quality identified during the audit.

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

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

Sincerely,

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

Enclosures



Mr. M. L. Sensibaugh

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MAR 16 2012

cc: w/enclosures

R. Unger, CBFO	*ED
R. Farrell, CBFO	ED
E. Preciado, CBFO	ED
J. R. Stroble, CBFO	ED
N. Castaneda, CBFO	ED
H. Budweg, CBFO	ED
T. Morgan, CBFO	ED
M. Pinzel, CBFO	ED
V. Cannon, WTS/CCP	ED
A. J. Fisher, WTS/CCP	ED
I. Quintana, WTS/CCP	ED
J. Carter, WTS/CCP	ED
M. Walker, WTS/CCP	ED
Y. Salmon, WTS/CCP	ED
J. Hoff, WTS	ED
M. Mullins, WTS	ED
T. Peake, EPA	ED
M. Eagle, EPA	ED
E. Feltcorn, EPA	ED
R. Joglekar, EPA	ED
S. Ghose, EPA	ED
R. Lee, 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
T. Bowden, CTAC	ED
C. Castillo, CTAC	ED
K. D. Martin, CTAC	ED
P. Hinojos, CTAC	ED
G. White, CTAC	ED
WIPP Operating Record	ED
CBFO QA File	
CBFO M&RC	

*ED denotes electronic distribution

CORRECTIVE ACTION REPORT

1. CAR No.: 12-010	2. Activity Report No.: A-12-09	3. Page 1 of 2
4. Controlling document: DOE/CBFO-94-1012 CCP-QP-002	5. CBFO Assessment Team Leader: Courtland G. Fesmire	
6. Responsible organization: WTS/CCP		
7a. CAQ/CAR Owner (Office Director): D. K. Ploetz	7b. CAQ was discussed with: R. Martin/M. Billett	
8. Requirement that is involved: See CAR Continuation Sheet.		
9. Condition Adverse to Quality (CAQ): See CAR Continuation Sheet.		
10. Suggested actions (Optional):		
11a. Significant CAQ? (If 'Yes', go to block 15b) Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> 11b. Work Suspension recommended? (If 'Yes', go to block 15b) Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> 11c. RCRA related? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> 11d. Accelerated corrective action required? (If 'Yes', go to block 15b) Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> 11e. Does this CAQ affect waste streams BNINW216 or BNINW218? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	12. Type of actions required: Remedial? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Investigative? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Root Cause Determination? 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: TQ-06	13b. CAR Initiator: <u>Cindi Castillo</u> <small>(printed name)</small> Cindi Castillo	Date: <u>3/13/12</u>
14a. Response due date: <u>13 April 2012</u>		
14b. Required corrective action completion date: <u>N/A</u>		
15. Concurrence:		
a. Assessment Team Leader (if applicable): <u>Courtland G. Fesmire</u> <small>(printed name)</small>	Date: <u>MARCH 15 2012</u> <u>CF 3/15/12</u>	
b. CBFO Quality Assurance Director: <u>R. Unger</u> <small>(printed name)</small>	Date: <u>14 Mar 12</u>	
16. Acceptance of Proposed Corrective Actions: _____ <small>(printed name)</small>		
17. Acceptance of Corrective Action Completion: _____ <small>(printed name)</small>		
18. Closure: _____ <small>(printed name)</small>		

CAR CONTINUATION SHEET

1. CAR No: 12-010

2. Activity No: A-12-09

3. Page 2 of 2**Block # 8 Requirement that is involved:**

CCP-QP-002, *CCP Training and Qualification Plan*, Rev. 31, section 3.3.2: "CCP Training supports the CCP Lead SPM in evaluating training and qualification requirements of each position. This may be done by, but is not limited to, evaluating training requirements using a training analysis."

DOE/CBFO-94-1012, *Quality Assurance Program Document (QAPD)*, Rev. 11, section 1.2.1: "The responsible organization shall analyze each job position to determine the task responsibilities of the position subject to the QAPD. The analysis shall identify minimum education, experience, and training prerequisites for each position involved in the planning, performance, or verification of activities subject to the QAPD, commensurate with the scope, complexity, and nature of the work."

Block # 9 Condition Adverse to Quality (CAQ):

Documentation was not provided to show evidence that the following Central Characterization Project positions were analyzed to determine task responsibilities: Remote-handled Waste Radiological Characterization Technical Staff and Nondestructive Assay Expert Analyst.

CORRECTIVE ACTION REPORT

1. CAR No.: 12-011	2. Activity Report No.: A-12-09	3. Page 1 of 2
4. Controlling document: DOE/CBFO-94-1012 CCP-QP-010 CCP-QP-008	5. CBFO Assessment Team Leader: Courtland G. Fesmire	
6. Responsible organization: WTS/CCP		
7a. CAQ/CAR Owner (Office Director): D. K. Ploetz	7b. CAQ was discussed with: S. Percy, J. Payanes	
8. Requirement that is involved: See CAR Continuation Sheet.		
9. Condition Adverse to Quality (CAQ): See CAR Continuation Sheet.		
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 type="checkbox"/> No <input checked="" type="checkbox"/>	
11e. Does this CAQ affect waste streams BNINW216 or BNINW218? 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: RM-06	13b. CAR Initiator: <u>Katelyn Martin</u> <small>(printed name)</small> Katelyn Martin	Date: 3-13-12
14a. Response due date: <u>13 April 2012</u>		
14b. Required corrective action completion date: <u>N/A</u>		
15. Concurrence:		
a. Assessment Team Leader (if applicable): <u>Courtland G. Fesmire</u> <small>(printed name)</small> Courtland G. Fesmire	Date: <u>15 March 2012</u>	
b. CBFO Quality Assurance Director: <u>Randy Unger</u> <small>(printed name)</small> Randy Unger	Date: <u>14 Mar 12</u>	
16. Acceptance of Proposed Corrective Actions: _____ <small>(printed name)</small> _____ Date: _____		
17. Acceptance of Corrective Action Completion: _____ <small>(printed name)</small> _____ Date: _____		
18. Closure: _____ <small>(printed name)</small> _____ Date: _____		

CAR CONTINUATION SHEET

1. CAR No: 12-011

2. Activity No: A-12-09

3. Page 2 of 2**Block # 8 Requirement that is involved:**

1. DOE/CBFO-94-1012, *Quality Assurance Program Document (QAPD)*, Revision 11, section 1.4.1 [I] states, "Evidence of review comment resolution shall be maintained on the originating organization's records inventory and disposition schedule (RIDS)."
2. CCP-QP-010, Revision 22, *CCP Document Preparation, Approval, and Control*, sections 2.3.3 and 2.3.3 [H] state, "Implementing QPs, TPs, and CM procedures include the following information as appropriate to the work to be performed: ... Identification and classification of QA records generated by the implementing procedure."
3. CCP-QP-008, Revision 19, *CCP Records Management*, section 4.1.1 [C] states, "Identify records in the implementing procedures."

Block # 9 Condition Adverse to Quality (CAQ):

1. Washington TRU Solutions Retrieval, Characterization, and Transportation Central Characterization Project Contact-handled for All Sites RIDS item 18, and Remote-handled for All Sites RIDS item 12 state: "CCP Procedures, Plans, and Reports – Original controlled procedures, plans, and reports and approval documentation." This item does not appear to include the expected evidence of comment resolution as has seen by the auditors in previous audits.
2. QA records in document review records packages have significantly changed since the previous audit. For example, the following information formerly contained in these packages is no longer included:
 - Comment resolution evidence
 - Attachments to comments/resolution emails
 - Document revision requests
 - Site project manager emails regarding 5-day CBFO notification

Therefore, the QA records requirements for such packages may not have been completely identified.