



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

MAY 10 2012



Mr. M. L. Sensibaugh, Manager
Central Characterization Project
Washington TRU Solutions, LLC
P.O. Box 2078
Carlsbad, New Mexico 88221-2078

Subject: Verification and Acceptance of Corrective Actions for CAR 12-010 from Audit A-12-09, Central Characterization Project Quality Assurance Audit

Dear Mr. Sensibaugh:

Enclosed are the results of the Carlsbad Field Office (CBFO) review and verification of completion of the corrective actions associated with CBFO Corrective Action Report (CAR) 12-010, which resulted from Audit A-12-09. The results of the verification are documented on the enclosed CAR Continuation Sheet, which indicate that the documentation of completion of corrective actions is acceptable.

The verification concluded that the associated corrective actions have been fulfilled and are satisfactorily implemented. Therefore, CAR 12-010 is considered closed.

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

Sincerely,

A handwritten signature in black ink, appearing to read "Courtland G. Fesmire".

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

Enclosure



Mr. M. L. Sensibaugh

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MAY 10 2012

cc: w/enclosure

E. Ziemianski, CBFO	*ED
R. Unger, CBFO	ED
R. Farrell, CBFO	ED
J. R. Stroble, CBFO	ED
N. Castaneda, CBFO	ED
T. Morgan, CBFO	ED
M. Pinzel, CBFO	ED
D.K. Ploetz, WTS/CCP	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. Felcorn, 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

1. CAR No: 12-010

2. Activity No: A-12-09

3. Page 1 of 2

Block # 17 & 18 Acceptance of Corrective Action Completion and Closure:

CBFO has reviewed the CAR 12-010 closure package, including objective evidence and supporting documentation submitted via URS letter CP:12:01201 UFC:2300.00, from M. L. Sensibaugh to Courtland G. Fesmire, "TRANSMITTAL OF DOCUMENTATION SUPPORTING COMPLETION OF THE CORRECTIVE ACTIONS ASSOCIATED WITH CBFO CORRECTIVE ACTION REPORT 12-010."

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

REMEDIAL ACTIONS

Washington TRU Solutions (WTS) proposed and has taken the following Remedial Actions in response to the CAR condition:

1. *CCP will prepare a documented analysis for the two positions identified in the CAR, and will determine whether the existing qualification cards are adequate, based on the results of the analyses. Any further actions will be as described in Section 1.c), below.*
2. *CCP will prepare a documented analysis for each of the positions identified in Sections 2.a) and 2.b) of this Corrective Action Plan, and will determine whether the existing qualification cards are adequate, based on the results of the analyses. Any further action will be as described in Section 1.c), below.*
3. *Any qualification card changes determined to be necessary, based on the analyses, will be added by revision to the affected qualification cards one week after the analyses are complete. Otherwise, no action will be taken with the qualification cards.*

Verification:

- a. Verified that CCP prepared a documented analysis for the Remote-Handled Waste Radiological Characterization Technical Staff and the NDA Expert Analyst positions. Both analyses were included in the objective evidence submitted with the closure package and labeled as "Action 1."
- b. Verified that CCP prepared a documented analysis for the following 12 positions: Transportation Vehicle Operator, Filter Change-Out Operator, OSPREY System Operator/ITR, TRUPACT-III Packaging Operator, TRUPACT-III Transportation Certification Official, In Situ Object Counting System (ISOCS) Operator, Hydrazine By High-Performance Liquid Chromatography (HPLC) Operator/ITR, HPLC Formaldehyde Operator/ITR, RH Visual Examination Operator/ITR, RH Site Project Manager, RH Waste Sampling Operator/ITR, and Pressure Change Leak Test Personnel. The above analyses were included in the objective evidence submitted with the closure package and labeled as "Action 2."
- c. Verified that CCP revised qualification cards that were affected by the newly developed job analyses for positions listed above in Sections a and b. Three CCP qualification cards: (1) RH-SPM-01, *RH SPM*; (2) RH-DTC-02, *OSPREY Operator/ITR*; and (3) NDA-07, *ISOCS Operator* were revised and included in the objective evidence submitted with the closure

package and labeled as "Action 3." The revisions made to the RH SPM-01 and RH-DTC-02 qualification cards only affected changes to required reading, and did not affect on-the-job training. The NDA-07 qualification card revisions were in reference to the ITR function of the qualification card, which was removed. Per CCP-TP-139, *CCP In Situ Object Counting System Nondestructive Assay Operating Procedure*, a second operator does a review, but forwards the results to the NDA Expert Analyst, who has the ultimate responsible for performing the independent review function.

INVESTIGATIVE ACTIONS

Investigated actions were evaluated and found to be acceptable, as documented in CBFO CAP acceptance memo CBFO:OQA:CF:12-1371:UFC 2300.00.

ROOT CAUSE DETERMINATION

Root Cause Determination was not required.

ACTIONS TO PRECLUDE RECURRENCE

WTS has proposed and has taken the following Actions to Preclude Recurrence in response to the CAR condition:

- a. *CCP has revised CCP-QP-002, CCP Training and Qualification Plan, to add a requirement for a documented analysis of positions requiring qualification.*
- b. *CCP has revised CCP-QP-040, Support Training, to add a requirement for a documented analysis of positions requiring qualification.*

Verification:

Verified through review of revised procedures (1) CCP-QP-002, Rev. 32, *CCP Training and Qualification Plan*, and (2) CCP-QP-040, Rev. 1, *Support Training*. Both procedures have expanded verbiage in the General Training Requirements Section 4.1.1 to include additional language on the requirement for a documented analysis for positions requiring qualification. Relevant pages from the above procedures were included in the objective evidence submitted with the closure package and are labeled as "Actions 4 and 5."

Based on the results of the review of the objective evidence included in the CAR 12-010 closure package, it is recommended that CAR 12-010 be closed.

Verification Performed By:

Cindi Castillo
Cindi Castillo

5/2/12
Date