



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

MAY 23 2012

ENTERED



Mr. Mike 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 CAP for CBFO CAR 12-021

Dear Mr. Sensibaugh:

Carlsbad Field Office (CBFO) Corrective Action Report (CAR) 12-021 was issued during the CBFO confirmation of an Advanced Mixed Waste Treatment Plant waste shipment. The evaluation determined that the visual examination method used (9VE11) was not an approved method in the Waste Isolation Pilot Plant (WIPP) Waste Data System.

Enclosed is the CBFO evaluation of the proposed Corrective Action Plan (CAP) submitted on May 8, 2012, in response to CAR 12-021. The evaluation indicates that the proposed CAP adequately addresses the issues documented in the CAR; therefore, the CAP is approved.

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

Sincerely,

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

Enclosure



Mr. Mike Sensibaugh

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MAY 23 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
M. Brown, CBFO	ED
D.K. Ploetz, WTS/CCP	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
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
T. Hall, NMED	ED
S. Holmes, 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. Hinojos, CTAC	ED
G. White, CTAC	ED
P.Y. Martinez, CTAC	ED
WIPP Operating Record	ED
CBFO QA File	
CBFO M&RC	

*ED denotes electronic distribution

CAR CONTINUATION SHEET

1. CAR No: 12-021

2. Activity No: N/A

3. Page 1 of 3**Block # 16 Acceptance of Proposed Corrective Actions:**

An evaluation was performed of the Corrective Action Plan (CAP) for Carlsbad Field Office (CBFO) Corrective Action Report (CAR) 12-021. The CAP was submitted via letter dated May 8, 2012, from Mr. D. K. Ploetz, Manager, Retrieval, Characterization and Transportation, to Mr. Courtland G. Fesmire, CBFO Quality Assurance Engineer.

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

CONDITION ADVERSE TO QUALITY

"During the CBFO confirmation of an AMWTP shipment (IN120089) it was determined that a VE method that had been surveilled and audited, 9VE11, was not on an approved certification letter. The change to the certification letter was awaiting the approval of the final audit report by NMED. The method had been placed in the WDS based on surveillance Report, S-11-30."

REMEDIAL ACTIONS

- a) *VE method identification number [method ID] 9VE11 was removed from the WDS, so that it can no longer be associated with any containers in the database. Removal of the method ID ensures that no waste containers can be successfully submitted to the WDS for certification until the CBFO certification letter is issued.*
- b) *Fifty-seven (57) containers certified in WDS using the 9VE11 method were reset to pre-submittal to certification status. Resetting the certification status in conjunction with removal of the method ID in the WDS ensures that containers entered into the WDS using that method cannot be certified and shipped.*
- c) *A verification of the Assay Methods and NDE Methods Reference Tables was performed to ensure that no other method IDs had been entered in WDS that were not authorized under the most current CBFO Certification Letters for each site or characterization/certification program. No additional problems were identified.*

Corrective Action Plan Review:

The remedial actions were deemed sufficient to resolve the issue.

INVESTIGATIVE ACTIONS

Several interviews were conducted with the Data Administrator who added the unapproved method ID into the WDS Reference Table. These interviews were performed to better understand the conditions that led to the addition of the method ID into WDS. The Data Administrator stated that he had been supplied with two documents and reviewed them to verify that the method ID was approved by CBFO. The two documents were:

- *Surveillance Report and transmittal letter to DOE-ID dated September 15, 2011 indicted that the AMWTP activities related to the VE of CH SCG S3000 waste using the equipment and procedures examined and subject to the measurement controls in place are adequately established for compliance with upper-tier requirements, satisfactory in the implementation of these requirements, and effective in achieving the desired results.*

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1. CAR No: 12-021

2. Activity No: N/A

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- A letter from AMWTP to CBFO dated May 31, 2011 was reviewed. It stated, "Based on the results of Audit A-10-24, the Carlsbad Field Office granted AMWTP continued certification authority for characterization and certification activities of Contact-Handled homogeneous solids (S3000) waste. We believe adding this method will not change the characterization of the waste, rather this action enhances our ability to treat and repackage waste that may contain PCB liquids or other prohibited items."

The Data Administrator did not consult WP08-NT.15, Waste Data System Maintenance of Administrative Reference Tables, during his evaluation, and instead relied on his memory of the steps in the procedure. As a consequence, the requirement for a CBFO certification letter was not met. The individual was aware that documentation from CBFO was a prerequisite for the addition of a method ID into the WDS, but indicated that he incorrectly believed that the surveillance report provided an adequate basis in this case. The Data Administrator made an incorrect decision, because he did not consult the actual requirements in the governing procedure.

Extent

As noted in the Remedial Actions section of this Corrective Action Plan, a verification of the Assay Methods and NDE Methods Reference Tables was performed on April 19th, 2012 to ensure that no other method IDs were entered in WDS that are not authorized under the most current CBFO Certification Letters for each site or characterization/certification program. The verification showed that the CAR condition is limited to 57 containers of S3000 homogeneous solids, all of which were characterized by the Advanced Mixed Waste Treatment Project (AMWTP). This is an isolated condition.

Impact

None of the 57 containers had been shipped to WIPP. The 57 containers were reset to pre-submittal to certification status and the 9VE11 method ID was removed. No additional unapproved method IDs were identified in WDS and no problems concerning associated date ranges were found.

Corrective Action Plan Review:

The investigative actions were deemed to adequately address the extent and impact.

ROOT CAUSE DETERMINATION

The WP08-NT.15 "Waste Data System Maintenance of Administrative Reference Tables" Program Plan, Step 3.3.7 requires that new method IDs will not be entered into the production database unless there is a CBFO certification letter that supports the entry of the method ID into the database.

The language in the CBFO surveillance report and the letter from the AMWTP to CBFO led the Data Administrator to believe that the method fell within the certification boundary and to the conclusion that the 9VE11 method ID was adequately supported for entry into the WDS and certification of waste containers.

The 9VE11 method ID is associated with Visual Examination of S3000 waste at the Advanced Mixed Waste Treatment Project (AMWTP). In order to ensure that WTS would have the necessary information when the time came to enter the method ID number into the WDS, the AMWTP Site Project Manager

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2. Activity No: N/A

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sent the Data Administrator all the relevant documentation in his possession: the surveillance report and the method ID for VE S3000 waste.

The Data Administrator misunderstood the reason for the transmittal from AMWTP, and believed that he was being asked to enter the method ID number immediately, on the basis of the surveillance report provided by AMWTP. This was a very unusual situation, which should have prompted the Data Administrator to consult the governing procedure. Because he did not do so, he failed to recognize that a CBFO surveillance report was not an adequate basis for entry of a method ID into WDS, and that a CBFO certification letter was required. A CBFO certification letter was not available supporting the method ID entry and the Data Administrator did not consult the latest CBFO certification letter file to verify that the method had been added to the list of certified equipment and processes. For the reasons described above, the root cause for the CAR condition is failure to follow the approved procedure.

A contributing factor is that, although the governing procedure contains the requirement for a CBFO certification letter as a prerequisite for entering a method ID into the WDS, the procedure does not contain an action statement directing that the individual making the entry verify that there is a current certification letter on file before entering the method ID.

Corrective Action Plan Review:

The root cause determination was deemed to adequately address the condition adverse to quality.

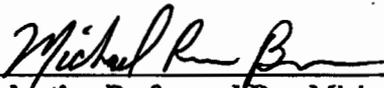
ACTION TO PRECLUDE RECURRENCE

- a) *Perform a review of WP08-NT.15 "Waste Data System Maintenance of Administrative Reference Tables" and clarify instructions as needed to ensure Data Administrators are required to check for a certification letter supporting the addition of subject method IDs.*
- b) *Perform briefing for all Data Administrators on WP08-NT.15 to review and confirm understanding or roles and responsibilities related to CBFO certification letters and approvals for method IDs.*

Corrective Action Plan Review:

The actions to preclude recurrence were deemed to be adequate.

Based upon the results of the review as described above, I recommend that the CAP for CAR 12-021 be accepted.



Evaluation Performed By: Michael R. Brown

5/22/2012

Date: