



Department of Energy
Carlsbad Field Office
P. O. Box 3090
Carlsbad, New Mexico 88221
JUL - 2 2012

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Mr. D.K. Ploetz, Manager
Retrieval, Characterization, and Transportation
Washington TRU Solutions, LLC
P.O. Box 2078
Carlsbad, New Mexico 88221 - 2078

Subject: Issuance of Accelerated CARs 12-026 and 12-027 Identified During Audit A-12-13

Dear Mr. Ploetz:

The Carlsbad Field Office performed recertification Audit A-12-13 of the Idaho National Laboratories Central Characterization Project waste characterization activities June 11-14, 2012. Enclosed are Corrective Action Reports (CARs) 12-026 and 12-027 addressing the conditions adverse to quality identified during the audit.

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

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

Sincerely,


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

Enclosure



Mr. D.K. Ploetz

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cc: w/enclosure
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P. Gomez, CTAC ED
P. Martinez, CTAC ED
WIPP Operating Record ED
CBFO QA File
CBFO M&RC

*ED denotes electronic distribution

CAR CONTINUATION SHEET

1. CAR No: 12-027

2. Activity No: A-12-13

3. Page 2 of 3**Block # 9 Condition Adverse to Quality (CAQ):**

The audit identified multiple documentation errors and deviations from procedures that indicate a condition of overall Central Characterization Project (CCP) inattention to detail. Please see the examples listed below:

- ❖ Nondestructive Examination (NDE) Batch RTR5110051 objective evidence indicates that the Site Project Manager (SPM) validation was initially completed without inclusion of a Nonconformance Report (NCR) that was associated with container SNL/NM006398R in the batch.

NCR-INL-2041-11 was initiated by an SPM on 5/13/11 against SNL/NM006398R. The NCR was dispositioned on 5/16/11. Corrections dictated by the NCR were recorded in the Batch Data Report (BDR) and the Independent Technical Reviewer checklist on 5/16/11. A second SPM signed the validation checklist on 5/19/11 with question #6, which asks if there were NCRs associated with the batch, answered as "no." A third SPM changed the answer to question #6 on 6/9/11.

Implementing procedural requirement:

CCP-TP-001, Rev. 19, CCP Project Level Data Validation and Verification, Section 4.2.1 requires that the following steps be included when initiating a BDR review:

[E.3] Compare NCRs included in the BDR to the NCRs in the P-TS, if applicable.

[E.4] IF any NCRs are missing from the P-TS OR DO NOT match those entered into the P-TS for the BDR, THEN contact the NCR Coordinator, AND resolve the problem.

- ❖ In NDE Batch RTR5110085 objective evidence, the radiographer indicated in the "Container Inventory and Comments" section that drum ND1081R contains metal framed HEPA filters. Section 4, Packaging Materials and Waste Material Parameters report, did not indicate the presence of any metal material. In this instance, an item that was identified in the description was not included as an estimated material parameter weight.

Implementing procedural requirement:

CCP-TP-001, Rev. 19, CCP Project Level Data Validation and Verification, Attachment 2, Questions 21 and 22 are as follows:

21. Does the BDR include an estimate of each material parameter weight in kg for each container?

22. Does the BDR include a description of each material parameter for each container?

- ❖ A container number was incorrectly recorded in the Batch Narrative on BDR INRTR5110094 for container 10046232. The container was recorded as 1004632 on 8/22/11. On 8/23/11, the ITR reviewed the BDR and recorded "yes" on the ITR checklist question #10, "is all data recorded clearly, legibly, and accurately?"

Implementing procedural requirement:

CCP-TP-053, Rev. 11, CCP Standard Real-Time Radiography (RTR) Inspection Procedure, Section 4.10.2 requires the ITR to "Review the BDR to the criteria in the checklist of Attachment 3, AND document the results."

- ❖ The ITR reviewed BDR INLRHRTR11006 and on 8/8/11 recorded "N/A" to ITR checklist questions 8 & 9: "Are all changes to original data lined out, initialed, and dated?" and "Were data changes made by the individual who originally collected the data or individual authorized to change the data?" A change was made in the comment section on the RTR Data Sheet for container #NRFTRUSPC074-1 on 8/2/11.

Implementing procedural requirement:

CCP-TP-508, Rev. 7, CCP RH Standard Real-Time Radiography Inspection Procedure, Section 4.9.2 requires the ITR to "Review the BDR to the criteria in the checklist of Attachment 3, AND complete Attachment 3."

CAR CONTINUATION SHEET

1. CAR No: 12-027

2. Activity No: A-12-13

3. Page 3 of 3Block # 9 Condition Adverse to Quality (CAQ) (Cont'd)

- ❖ The ITR reviewed BDR INLRHRTR12002 and on 3/1/12 recorded "yes" to ITR checklist question #7: "Is all data recorded clearly, legibly, and accurately?" The BDR number was not correctly recorded on the RTR Data Sheet for container # ANLE33G on 2/28/12. Note: The BDR number was corrected on 3/7/12.

Implementing procedural requirement:

CCP-TP-508, Rev. 7, CCP RH Standard Real-Time Radiography Inspection Procedure, Section 4.9.2 requires the ITR to "Review the BDR to the criteria in the checklist of Attachment 3, AND complete Attachment 3."