



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

AUG 13 2012



Mr. Mike Sensibaugh, Manager
Central Characterization Project
Retrieval, Characterization, and Transportation
Washington TRU Solutions, LLC
P. O. Box 2078
Carlsbad, New Mexico 88221-2078

Subject: Issuance of CARs 12-033, 12-034, and 12-035 Identified During Audit A-12-12

Dear Mr. Sensibaugh:

The Carlsbad Field Office performed recertification Audit A-12-12 of the Los Alamos National Laboratory Central Characterization Project waste characterization activities July 24-26, 2012. Enclosed are Corrective Action Reports (CARs) 12-033, 12-034, and 12-035, 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. Mike Sensibaugh

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AUG 13 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
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. Mullins, WTS	ED
G. Rael, LASO	ED
L. Bishop, LASO	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
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
G. Knox, CTAC	ED
P. Gomez, CTAC	ED
C. Simmons, LANL/CCP	ED
WIPP Operating Record	ED

CBFO QA File

CBFO M&RC

*ED denotes electronic distribution

CORRECTIVE ACTION REPORT

1. CAR No.: 12-033	2. Activity Report No.: A-12-12	3. Page 1 of 3
4. Controlling document: DOE/CBFO-94-1012	5. CBFO Assessment Team Leader: Court Fesmire	
6. Responsible organization: WTS/CCP Retrieval, Characterization & Transportation (RCT)		
7a. CAQ/CAR Owner (Office Director): D.K. Ploetz	7b. CAQ was discussed with: Craig Simmons	
8. Requirement that is involved: See CAR Continuation Sheet		
9. Condition Adverse to Quality (CAQ): See CAR Continuation Sheet		
10. Suggested actions (Optional): N/A		
11a. Significant CAQ? (If 'Yes', go to block 15b) Yes <input checked="" type="checkbox"/> No <input 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 checked="" type="checkbox"/> No <input 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 checked="" type="checkbox"/> No <input type="checkbox"/> Actions to Preclude Recurrence? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
13a. Trend Code: MA-05	13b. CAR Initiator: <u><i>Greg Knox</i></u> <small>(printed name)</small> GREG KNOX	Date: 08/08/12
14a. Response due date: <u>8/24/2012 OF 8/1/12</u>		
14b. Required corrective action completion date:		
15. Concurrence:		
a. Assessment Team Leader (if applicable): <u><i>Courtland Fesmire</i></u> <small>(printed name)</small> COURTLAND FESMIRE		Date: <u>09 Aug 2012</u>
b. CBFO Quality Assurance Director: <u><i>R. Unger</i></u> <small>(printed name)</small> R. UNGER		Date: <u>10 Aug 12</u>
16. Acceptance of Proposed Corrective Actions:		Date:
<small>(printed name)</small>		
17. Acceptance of Corrective Action Completion:		Date:
<small>(printed name)</small>		
18. Closure:		Date:
<small>(printed name)</small>		

CAR CONTINUATION SHEET

1. CAR No: 12-033

2. Activity No: A-12-12

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Block 8 - Requirement that was involved.

CBFO Quality Assurance Program Document (QAPD), section 1.1.1.1, Management:

- A. "Management has overall responsibility for successfully accomplishing activities subject to this QAPD...."
- C. "Management quality responsibilities include:
6. Identifying, investigating, reporting, and correcting quality problems."

Block 9 - Condition Adverse to Quality.

The audit identified multiple documentation errors and deviations from procedure that indicate a condition of overall Central Characterization Project (CCP) management inattention to detail and failure of management to follow procedures. Examples are listed below.

Condition (Concern #4):

During the review of qualification cards for multiple disciplines, it was identified that the SPM signature approving the employee to perform the duties related to the qualification card was not the designated Lead or Alternate SPM's signature. The Lead and Alternate SPM identified in the most current correspondence from the CCP Manager provided during the audit are no longer assigned to LANL/CCP.

Implementing procedural requirement:

CCP-QP-002, Rev. 32, CCP Training and Qualification Plan, Step 3.1.1 states, "[CCP Manager] Designates the Lead and Alternate Site Project Manager (SPM), in annual correspondence, with updates as necessary during the year."

Condition (Concern #5):

During the review of qualification cards for visual examination, it was identified that the SPM signature approving the employee to perform the duties related to the qualification card is dated prior to the verification performed by CCP Training of completion of briefings and the comprehensive exam.

Implementing procedural requirement:

CCP-QP-002, Rev. 32, CCP Training and Qualification Plan, Step 3.2.10 states, "[CCP Lead Site Project Manager (SPM)] Ensures a CCP Trainee has completed all indoctrination reading prior to accessing operations/equipment."

Condition (Concern #9):

During the review of nonconformance reports, it was identified that Block 19b, Instructions for Completion, for NCR-LANL-1004-12, Revision 0, was not completed prior to Final Disposition Approval.

CAR CONTINUATION SHEET

1. CAR No: 12-033

2. Activity No: A-12-12

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Also, it was identified that in NCR-LANL-1010-12, Revision 0, Block 19c, Corrective Actions, was marked N/A, but is required to be completed for Rework.

Implementing procedural requirement:

CCP-QP-005, Rev. 21, CCP TRU Nonconforming Item Reporting and Control, section 4.4.11 states, "IF the disposition is Rework, THEN provide instructions for completion in Block 19(b)."

Also,

Section 4.4.15 states, "Evaluate the need for Actions to Prevent Recurrence (Repair and Rework), AND document action in Block 19(c)."

Condition (Concern #12):

During the review of nonconformance report NCR-LANL-1010-12, Revision 0, it was identified that the BDR was reworked to resolve a nonconforming item prior to the NCR being written. Specifically, data generation-level personnel made changes to the documentation of the packaging configuration, and the ITR re-reviewed the BDR (LAHSG1202) prior to NCR-LANL-1010-12 being written. These actions are part of the instructions for completion associated with the final disposition of the NCR.

Implementing procedural requirement:

CCP-QP-005, Rev. 21, CCP TRU Nonconforming Item Reporting and Control, section 2.5.1 states, "NCRs are validated before beginning the evaluation and disposition process."

CORRECTIVE ACTION REPORT

1. CAR No.: 12-034	2. Activity Report No.: A-12-12	3. Page 1 of 2
4. Controlling document: CCP-TP-001	5. CBFO Assessment Team Leader: Court Fesmire	
6. Responsible organization: WTS/CCP Retrieval, Characterization & Transportation (RCT)		
7a. CAQ/CAR Owner (Office Director): D.K. Ploetz	7b. CAQ was discussed with: Craig Simmons	
8. Requirement that is involved: See CAR Continuation Sheet		
9. Condition Adverse to Quality (CAQ): See CAR Continuation Sheet		
10. Suggested actions (Optional): N/A		
11a. Significant CAQ? (If 'Yes', go to block 15b) Yes <input checked="" type="checkbox"/> No <input 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 checked="" type="checkbox"/> No <input type="checkbox"/>	Root Cause Determination? Yes <input checked="" type="checkbox"/> No <input 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: DV-05	13b. CAR Initiator: <u>Paul Gomez</u> <small>(printed name)</small>	Date: 08/08/12
14a. Response due date: <u>8/24/2012</u> <small>CF 8/19/12</small>		
14b. Required corrective action completion date:		
15. Concurrence:		
a. Assessment Team Leader (if applicable): <u>Courtland Fesmire</u> <small>(printed name)</small>	Date: <u>9 Aug 2012</u>	
b. CBFO Quality Assurance Director: <u>R. Tamber</u> <small>(printed name)</small>	Date: <u>10 Aug 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: 12-034

2. Activity No: A-12-12

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Block 8 - Requirement that is involved.

CCP-TP-001, Revision 19, Section 4.2.8, "Answer each question on the appropriate SPM checklist after verifying that the specific criteria have been met."

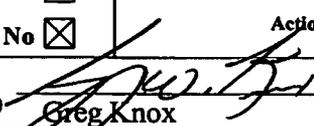
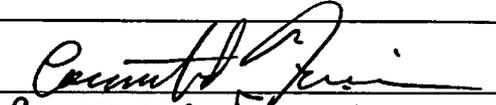
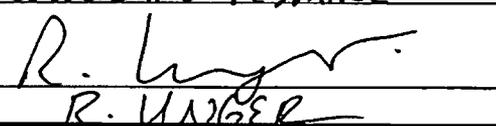
Block 9 – Condition Adverse to Quality.

Condition (Concern #8):

In VE BDRs LAVE500468 and LAVE500502, CCP-TP-001, Attachment 1 (SPM Checklist), Question #24 asks: "Is the size of the rigid liner vent hole recorded to determine the appropriate DAC? N/A if no liner lid."

In both BDRs, the question was answered with "N/A" and the comment "No Liner Lid." However, the VE Data Forms for containers 89320 (LAVE500468) and 91720 (LAVE500502) were annotated "Yes," and "Rigid Liner Lid Was Present." The audit team asked for four additional BDRs, two each bracketing each of the discrepant BDRs. Of those four BDRs, two were found to be discrepant.

CORRECTIVE ACTION REPORT

1. CAR No.: 12-035	2. Activity Report No.: A-12-12	3. Page 1 of 2
4. Controlling document: DOE/CBFO-94-1012	5. CBFO Assessment Team Leader: Court Fesmire	
6. Responsible organization: WTS/CCP Retrieval, Characterization & Transportation (RCT)		
7a. CAQ/CAR Owner (Office Director): D.K. Ploetz	7b. CAQ was discussed with: Val Cannon	
8. Requirement that is involved: See CAR Continuation Sheet		
9. Condition Adverse to Quality (CAQ): See CAR Continuation Sheet		
10. Suggested actions (Optional): N/A		
11a. Significant CAQ? (If 'Yes', go to block 15b) Yes <input checked="" type="checkbox"/> No <input 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 checked="" type="checkbox"/> No <input 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 checked="" type="checkbox"/> No <input type="checkbox"/> Actions to Preclude Recurrence? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
13a. Trend Code: MA-05	13b. CAR Initiator:  (printed name) Greg Knox	Date: 08/08/12
14a. Response due date: 8/24/2012		
14b. Required corrective action completion date:		
15. Concurrence:		
a. Assessment Team Leader (if applicable):  (printed name) COURTANO FESMIRE		Date: 9 Aug 2012
b. CBFO Quality Assurance Director:  (printed name) R. WAGNER		Date: 10 Aug 12
16. Acceptance of Proposed Corrective Actions: _____ (printed name)		Date: _____
17. Acceptance of Corrective Action Completion: _____ (printed name)		Date: _____
18. Closure: _____ (printed name)		Date: _____

CAR CONTINUATION SHEET

1. CAR No: 12-035

2. Activity No: A-12-12

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Block 8 - Requirement that is involved.

CCP-TP-093, Rev. 16, section 4.3.1, "For all containers to be sampled, verify the DAC prior to Sampling by using Tables 1-5, as appropriate AND perform the following...."

CCP-TP-106, Rev. 7, Attachment 3, Question #2, "Are calculations correct for the Drum Age Criteria (DAC), temperature equilibrium time, and percent complete?"

CCP-TP-001, Rev. 19, Attachment 9, Question #24, "Has the correct DAC scenario and waste packaging configuration been selected?"

Block 9 - Condition Adverse to Quality.

During the CCP review of the completed BDR LAHSG1202 discrepancies were noted. On the Packaging Configuration Group Number field of Attachment 2, *Sample Container Data Form*, the package configuration was recorded incorrectly. This led to the Permit Required Equilibrium Time (Days) being recorded incorrectly, also. However, the containers still met the requirements after the corrected DACs and corrected package configuration. The original closure date of the BDR was April 26, 2012. An internal NCR, NCR-LANL-1010-12 was issued on July 23, 2012, after the containers had been shipped to WIPP for disposal.

CBFO QA has determined that this issue is similar to the issue documented in NCR-SRS-0823-12, which was identified at the Savannah River site on 7/2/2012. In NCR-SRS-0823-12, standard waste boxes (SWBs) were assigned packaging configuration group 3 (which is a group for 55-gallon drums) instead of the required packaging configuration group 5 or 6 for SWBs.