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

SEP 17 2012

RECEIVED
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NMED Hazardous Waste Bureau

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 12-039 and 12-040 Identified During Audit A-12-16

Dear Mr. Sensibaugh:

The Carlsbad Field Office performed recertification Audit A-12-16 of the Argonne National Laboratory Central Characterization Project waste characterization activities, August 28 – 30, 2012. Enclosed are Corrective Action Reports (CARs) 12-039 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 or comments, please contact me at (575) 234-7548.

Sincerely,

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

Enclosure

120938

CBFO:OQA:CGF:JGC:12-1513:UFC 2300.00

cc: w/enclosure

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A. J. Fisher, WTS/CCP	ED
I. Quintana, WTS/CCP	ED
M. Walker, WTS/CCP	ED
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J. Carter, WTS/CCP	ED
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T. Kesterson, NMED/DOE OB	ED
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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
B. Pace, CTAC	ED
P. Gomez, CTAC	ED
W. Root, WTS/CCP	ED
WIPP Operating Record	ED
CBFO QA File	
CBFO M&RC	

*ED denotes electronic distribution

CBFO Form 3.1-1

CORRECTIVE ACTION REPORT

1. CAR No.: 12-040	2. Activity Report No.: A-12-16	3. Page 1 of 2
4. Controlling document: CCP-TP-093 and CCP-QP-005	5. CBFO Assessment Team Leader: C. Fesmire	
6. Responsible organization: WTS/CCP Retrieval, Characterization and Transportation (RCT)		
7a. CAQ/CAR Owner (Office Director): D. K. Ploetz	7b. CAQ was discussed with: I. Quintana and W. Root	

8. Requirement that is involved:
See Attached CAR Continuation Sheet

9. Condition Adverse to Quality (CAQ):
See Attached CAR Continuation Sheet

10. Suggested actions (Optional):
N/A

11a. Significant CAQ? (If 'Yes', go to block 15b)	Yes ☐	No ☒	12. Type of actions required:		
11b. Work Suspension recommended? (If 'Yes', go to block 15b)	Yes ☐	No ☒	Remedial?	Yes ☒	No ☐
11c. RCRA related?	Yes ☐	No ☒	Investigative?	Yes ☒	No ☐
11d. Accelerated corrective action required? (If 'Yes', go to block 15b)	Yes ☐	No ☒	Root Cause Determination?	Yes ☐	No ☒
11e. Does this CAQ affect waste streams BNINW216 or BNINW218?	Yes ☐	No ☒	Actions to Preclude Recurrence?	Yes ☒	No ☐

13a. Trend Code: DV-05

13b. CAR Initiator: [signature] FOR (printed name) Paul C. Gomez Date: 9/6/12

14a. Response due date: 28 September 2012

14b. Required corrective action completion date:

15. Concurrence:

a. Assessment Team Leader (if applicable): [signature] (printed name) COURTLAND FESMIRE Date: 12 Sept 2012

b. CBFO Quality Assurance Director: [signature] (printed name) R. UNGER Date: 13 Sep 12

16. Acceptance of Proposed Corrective Actions: _____ (printed name) Date: _____

17. Acceptance of Corrective Action Completion: _____ (printed name) Date: _____

18. Closure: _____ (printed name) Date: _____

CBFO Form 3.1-2

CAR CONTINUATION SHEET

1. CAR No: 12-040	2. Activity No: A-12-16	3. Page 2 of 2.

Block 8. - Requirement that is involved:

CCP-TP-093, Rev. 16, *CCP Sampling of TRU Waste Containers*, section 4.5.1[A.1], Chain of Custody # (sequential number starting with number 1) (on Page 1 and 2)."

CCP-QP-005, Rev 21, *CCP TRU Nonconforming Item Reporting and Control*, section 2.2.1, states in part, "CCP personnel who discover nonconforming items, activities, and processes have the responsibility to originate NCRs for nonconforming items, systems, or equipment..."

Section 3.1.1 states, "CCP personnel who discover conditions adverse to quality are responsible for originating an NCR or ensuring an NCR is written."

Block 9. – Condition Adverse to Quality (CAQ):

The chain-of-custody (COC) numbers for headspace gas sampling batch data reports (BDRs) ANHSG1201 and ANHSG1202 were incorrect: both were numbered 0001. The COC number for ANHSG1201 was corrected only after the BDR had successfully passed both Independent Technical Reviewer and Site Project Manager review. The error was discovered upon the review of ANHSG1202, where the COCs were corrected to 0006 and 0007, respectively. The COC number corresponding with Environmental Chemistry Laboratory BDR ECL12014M was not corrected. No nonconformance report was generated as required by CCP procedures, which resulted in discrepancies between the ANL/CCP BDR ANHSG1201 and the corresponding ECL BDR field COC documentation.

CBFO Form 3.1-1

CORRECTIVE ACTION REPORT

1. CAR No.: 12-039	2. Activity Report No.: A-12-16	3. Page 1 of 2
4. Controlling document: CBFO QAPD, Rev. 11	5. CBFO Assessment Team Leader: Court Fesmire	
6. Responsible organization: WTS/CCP Retrieval, Characterization and Transportation (RCT)		
7a. CAQ/CAR Owner (Office Director): D.K. Ploetz	7b. CAQ was discussed with: Wes Root	

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 ☐	No ☒
11b. Work Suspension recommended? (If 'Yes', go to block 15b)	Yes ☐	No ☒
11c. RCRA related?	Yes ☐	No ☒
11d. Accelerated corrective action required? (If 'Yes', go to block 15b)	Yes ☐	No ☒
11e. Does this CAQ affect waste streams BNINW216 or BNINW218?	Yes ☐	No ☒

12. Type of actions required:

Remedial?	Yes ☒	No ☐
Investigative?	Yes ☐	No ☒
Root Cause Determination?	Yes ☐	No ☒
Actions to Preclude Recurrence?	Yes ☒	No ☐

13a. Trend Code: QA-01

13b. CAR Initiator: FOR (printed name) Berry Pace Date: 6SEP2012

14a. Response due date: 28 SEPT 2012

14b. Required corrective action completion date:

15. Concurrence:

a. Assessment Team Leader (if applicable): (printed name) COURTLAND FESMIRE Date: 12 Sept 2012

b. CBFO Quality Assurance Director: (printed name) R. UNGER Date: 13 Sep 12

16. Acceptance of Proposed Corrective Actions: (printed name) Date:

17. Acceptance of Corrective Action Completion: (printed name) Date:

18. Closure: (printed name) Date:

CBFO Form 3.1-2

CAR CONTINUATION SHEET

1. CAR No: 12-039	2. Activity No: A-12-16	3. Page 2 of 2.

Block 8 – Requirement that is involved.

CBFO QAPD, Rev.11, section 2.1A: "Work shall be performed under controlled conditions using approved instructions, procedures, or other appropriate means."

CBFO QAPD, Rev.11, section 2.1.1B: "...Criteria describing acceptable work performance shall be defined for the worker."

CBFO QAPD, Rev 11, section 2.1.2.B: "Implementing procedures shall include the following information, as appropriate to the work to be performed"; item 4: "Quantitative or qualitative acceptance criteria sufficient for determining that activities were satisfactorily accomplished."

Block 9 – Condition Adverse to Quality.

CCP-TP-513 references a non-number-controlled Argonne Intra-Laboratory memorandum to define the Acceptable Difference limit criteria for differences in FEW segment lengths described in the AK and the actual length derived during the measurement at VE.

> Reference: CCP-TP-513, Section 4.1.6[B] states; *"IF the measured results and the AK documentation are within the Acceptable Difference limits (defined in the memo to SPM), THEN record the AK ID Number (e.g., AG ID Number) and measurements on Attachment 1."*

The procedure does not identify, nor is there documentation identifying, the specific memorandum to be used.

Note: A copy of a memorandum is in each of the BDRs selected for review.