



**Department of Energy**

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

OCT - 3 2012



Mr. M. L. Sensibaugh, Manager  
Central Characterization Project  
Nuclear Waste Partnership LLC  
P.O. Box 2078  
Carlsbad, NM 88221-2078

**Subject:** Evaluation of the CAP for CBFO CAR 12-040 from Audit A-12-16, Argonne  
National Laboratory Central Characterization Project

Dear Mr. Sensibaugh:

Enclosed are the results of the Carlsbad Field Office (CBFO) evaluation of the Corrective Action Plan (CAP) associated with CBFO Corrective Action Report (CAR) 12-040. The results of the review indicate that the CAP is acceptable. Upon completion of all corrective actions, please provide notification and documentation supporting closure for this CAR so that verification activities may be performed.

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

Sincerely,

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

Enclosure



Mr. M. L. Sensibaugh

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cc: w/enclosure

J. Franco, CBFO	*ED
R. Unger, CBFO	ED
J. R. Stroble, CBFO	ED
T. Morgan, CBFO	ED
M. Pinzel, CBFO	ED
F. Sharif, NWP	ED
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V. Cannon, NWP/CCP	ED
A. J. Fisher, NWP/CCP	ED
I. Quintana, NWP/CCP	ED
M. Walker, NWP/CCP	ED
Y. Salmon, NWP/CCP	ED
J. Carter, NWP/CCP	ED
W. Root, NWP/CCP	ED
J. Hoff, NWP	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

WIPP Operating Record

CBFO QA File

CBFO M&RC

\*ED denotes electronic distribution

## CAR CONTINUATION SHEET

1. CAR No: 12-040

2. Activity No: A-12-16

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**Block # 16 Acceptance of Proposed Corrective Actions:**

An evaluation was performed of the corrective action plan (CAP) established to address Carlsbad Field Office (CBFO) Corrective Action Report (CAR) 12-040. The CAP was submitted via URS/Washington TRU Solutions LLC letter CP:12:01465 UFC:2300.00 dated September 27, 2012, from Mr. M. L. Sensibaugh, Manager, Central Characterization Project, to Mr. Courtland Fesmire, Quality Assurance Engineer, CBFO Quality Assurance.

*Italicized text, taken verbatim from the CAP, is used to reflect the correlation between the actions required by the CAR and the method used for evaluation.*

**REMEDIAL ACTIONS**

*CCP has corrected the COC reference in the body of analysis BDR ECL12014M to agree with the correct copy of COC 0006 that was placed into the BDR package by the SPM during his project-level review of the BDR on June 6, 2012.*

**Evaluation:**

The remedial action stated above appropriately corrects the specific condition adverse to quality noted in the CAR. Verification of this action will be performed upon receipt of the closure documentation.

**INVESTIGATIVE ACTIONS****1. Selection of Incorrect Chain-of-Custody Numbers:**

*The CCP investigation showed that while the process for assigning COC numbers for CH HSG samples is proceduralized in CCP-TP-093, the requirements are difficult for an inexperienced operator to implement. The operator has to research the most recent previous HSG sampling BDR and use the next sequential numbers for that BDR. At the smaller Host locations, it can be years between sampling activities. In the case of ANL, the most recent previous sampling was conducted in 2010. The instructions as written could easily lead an inexperienced operator to select 0001 as the number for the first COC for each HSG sampling BDR. Based on investigation and review of the situation, CCP believes that this is what actually happened.*

**2. Failure to Issue a Nonconformance Report When the Incorrect Chain-of-Custody Number was Discovered by the Headspace Gas Sampling Operators**

*When any BDR is being reviewed at Data Generation Level (DGL), operators and Independent Technical Reviewers (ITRs) are generally allowed to make pen-and-ink corrections to the report without issuing an NCR. The BDR is in-process and is still being finalized, until the DGL reviewers have both signed their approvals and the report moves on to project-level review.*

*This was a very unusual situation, where the COC (a part of the BDR but also separate from the BDR) was found to be incorrect. DGL personnel correcting the BDR failed to realize that this was the rare exception to the rule, that action beyond simply making pen-and-ink corrections was called for. They should have checked with the Vendor Project Manager or Quality Assurance for guidance. Had they done so, an NCR would have been written. Preparation of an NCR would have ensured that the copy of the COC form traveling with the samples to the ECL would also have been corrected.*

*As noted in the Extent section of this Corrective Action Plan, the CCP check of the numbering of other COCs in HSG sampling BDRs from other locations shows that this is an isolated condition. Further, the change proposed to the COC numbering protocol (using the BDR number as the basis for the COC number) makes it extremely unlikely that the CAR condition will recur. The preparer no longer has to research previous BDRs to determine the COC number – it is based solely on the number of the BDR that is being processed.*

**3. Extent**

*For the two COCs cited in the CAR:*

- *COC 0006 was corrected in sampling BDR ANHSG1201 on May 21, 2012.*
- *The problem with COC 0006 was noted by the SPM during his review of the associated analysis BDR ECL12014M on June 6, 2012. The SPM included a copy of corrected COC 0006 in the BDR package, as part of his completed checklist, but did not transcribe the corrected COC number into the body of the BDR proper.*

## CAR CONTINUATION SHEET

1. CAR No: 12-040

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- COC 0007 was corrected in sampling BDR ANHSG1202 on May 17, 2012.
- The corrected COC 0007 was used in the preparation of analysis BDR ECL12017M.

CCP performed a check of the numbering of COCs in HSG sampling BDRs from SRS, LANL, and INL, and found no other cases in the sample review where incorrect COC numbers were assigned. The CAR condition is considered to be an isolated case.

## 4. Impact

The purpose of the COC forms was fulfilled: sample traceability was in no way compromised by the use of the incorrect COC numbers.

Evaluation:

The actions that CCP has taken, as described above, clearly demonstrate that a thorough investigation was performed to determine the contributing factors leading up to the condition noted in the CAR.

## ROOT CAUSE DETERMINATION

Not required by the CAR.

## ACTION TO PRECLUDE RECURRENCE

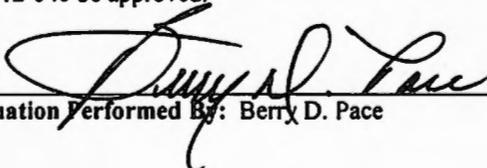
- CCP will revise CCP-TP-093 to change the COC numbering protocol so that the COC number uses the BDR number for ease of traceability and uniqueness.
- CCP will issue a Lessons Learned describing the situation and reminding personnel to be alert for unusual cases where actions should be taken beyond those that are generally called for. The Lessons Learned will include a section about checking with management or to Quality Assurance for guidance, when unusual situations arise.

Evaluation:

Based upon the investigative actions and the identification of the factors that contributed to the condition in the CAR, the actions to revise CCP-TP-093 and the issuance of a Lessons Learned bulletin are deemed appropriate.

## ACCEPTANCE

The results of the evaluation of the CAP suggest that the proposed actions adequately address the condition adverse to quality documented in CAR 12-040, and provide appropriate measures to preclude recurrence. Therefore, it is recommended that the CAP for CAR 12-040 be approved.

Evaluation Performed By:  Berry D. Pace

Date: 10/02/12