



Department of Energy
 Carlsbad Field Office
 P. O. Box 3090
 Carlsbad, New Mexico 88221
 NOV - 5 2012

 **ENTERED**



Mr. E. Gulbransen, Manager
 National TRU Program Certification
 Nuclear Waste Partnership LLC
 P. O. Box 2078
 Carlsbad, NM 88221-2078

Subject: Review and Verification of the Corrective Actions Submitted in Response to CBFO CAR 12-026

Dear Mr. Gulbransen:

Enclosed are the results of the Carlsbad Field Office (CBFO) review and verification of the corrective actions submitted in response to CBFO Corrective Action Report (CAR) 12-026, which resulted from CBFO Audit A-12-13 of the Idaho National Laboratory Central Characterization Project Characterization and Certification of Contact-Handled and Remote-Handled Waste Activities. The results of the verification are documented on the enclosed CAR Continuation Sheets, which indicate that the associated corrective actions have been fulfilled and are satisfactorily implemented. Therefore, CAR 12-026 is considered closed.

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

Sincerely,



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

ru FOR
2 Nov 12
ru R. UMBER

Enclosure



Mr. E. Gulbransen

-2-

NOV - 5 2012

cc: w/enclosure

J. Franco, CBFO	*ED
R. Unger, CBFO	ED
J. R. Stroble, CBFO	ED
N. Castañeda, CBFO	ED
M. Pinzel, CBFO	ED
T. Morgan, CBFO	ED
F. Sharif, NWP	ED
T. Reynolds, NWP	ED
M. Sensibaugh, NWP/CCP	ED
V. Cannon, NWP/CCP	ED
A. J. Fisher, NWP/CCP	ED
I. Quintana, NWP/CCP	ED
M. Walker, NWP/CCP	ED
J. Hoff, NWP	ED
M. Mullins, NWP	ED
Y. Salmon, NWP/CCP	ED
J. Carter, NWP/CCP	ED
J. Wells, DOE-ID	ED
W. Lattin, DOE-ID	ED
T. Peake, EPA	ED
L. Bender, 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
T. Bowden, CTAC	ED
G. Knox, CTAC	ED
WIPP Operating Record	ED
CBFO QA File	
CBFO M&RC	

*ED denotes electronic distribution

CAR CONTINUATION SHEET

1. CAR No: 12-026

2. Activity No: A-12-13

3. Page 1 of 2

Block # 17 Acceptance of Corrective Action Completion:

The Carlsbad Field Office (CBFO) has performed an evaluation of the evidence supporting completion of the corrective actions associated with CBFO Corrective Action Report (CAR) 12-026, identified during CBFO Audit A-12-13, Idaho National Laboratory (INL)/Central Characterization Project (CCP) TRU Waste Characterization and Certification of Contact-Handled and Remote-Handled Waste Activities. The closure documentation was submitted via Nuclear Waste Partnership LLC (NWP) letter CP:12:01499 UFC:2300.00, dated October 10, 2012, from Mr. E. Gulbransen, Manager, National TRU Program Certification, to Mr. Courtland G. Fesmire, P.E., Quality Assurance Engineer, Carlsbad Field Office. The methods used to verify completion of the actions contained in the approved corrective action plan (CAP) are described below.

CAR 12-026 identified multiple documentation errors and deviations from procedure that indicated a condition of overall inattention to detail by CCP personnel and lack of management oversight. The CCP was required to address Remedial Actions, Investigative Actions, Root Cause, and Actions to Preclude Recurrence.

REMEDIAL ACTIONS:

The evaluation verified the following remedial actions by review of documentation included in the CCP CAR closure documentation:

1. On June 15, 2012, the CCP Mobile Loading Unit (MLU) Field Operations Manager contacted MLU crew leads at each Host site and directed them to brief all operators on the requirement to sign-off and verify each step as it is completed. Even if individual steps can be performed in any order, each step must be separately documented before continuing to the next one. This direction was documented in an email dated July 5, 2012, reinforcing the previous direction from management. All MLU personnel involved in the conditions reported in CAR 12-026 attended the briefing and signed the attendance sheets.
2. The bag of washers has been removed from the spare parts cabinet and returned to Washington TRU Solutions (WTS) Packaging Engineering for evaluation. The washers were then returned to the warehouse and replaced in bulk inventory (traceability had not been compromised). The warehouse provided individually-packaged washers, pre-labeled by the supplier, to the MLU team at INL to replenish their complement of spare parts.
3. As noted in the CAR, the audit team immediately advised the Transportation Certification Official (TCO) of the discovery of a cracked part on the outer containment assembly (OCA) lid for a loaded HalfPACT unit ready to leave the docks. The TCO confirmed the broken part and verified that inspection of the part had been completed and signed off. Since the part did not meet requirements, it was replaced, following the approved maintenance work instruction.
4. An inventory of spare parts at other Host sites was completed, and no additional problems were identified.

INVESTIGATIVE ACTIONS:

Verification was performed to ensure that Extent and Impact of the conditions adverse to quality were investigated. During the CCP investigative actions, the inventory of spare parts cabinets at the Advanced Mixed Waste Treatment Project (AMWTP) site contained bags with correct, but hand written, information. The hand written information was replaced by physical labels.

ROOT CAUSE:

The evaluation verified that CCP provided a Root Cause associated with the conditions adverse to quality associated with CAR 12-026. The root causes for the conditions adverse to quality identified in CAR 12-026 were determined to be inattention to detail and lack of management oversight.

CAR CONTINUATION SHEET

1. CAR No: 12-026

2. Activity No: A-12-13

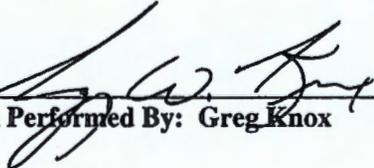
3. Page 2 of 2

ACTIONS TO PRECLUDE RECURRENCE:

The evaluation verified the following Actions to Preclude Recurrence, as proposed in the CAP for CAR 12-026, by review of documentation included in the CCP CAR closure documentation:

1. The CCP MLU TCO assigned to INL has been directed to spend more time in the field, observing loading and shipping activities, to provide greater assurance that work is being conducted in accordance with procedures, in a manner consistent with compliant practices at other Host site locations.
2. Since the time of the recertification audit, the CCP Field Operations Manager has rotated individuals from the Savannah River Site to INL to improve consistency in complex-wide loading and shipping operations, and to provide fresh sets of eyes on the way that work is conducted.
3. The CCP Field Operations Manager directed that waste operators at each Host site be briefed on the requirement to sign-off and verify each step as it is completed. Even if individual steps can be performed in any order, each step must be separately documented before continuing to the next one. All MLU personnel involved in the conditions reported in CAR 12-026 attended the briefing and signed the rosters.
4. CCP has issued Lessons Learned 2012-07, describing the situation and stating that steps must be signed off and verified as they are performed, even when the steps may be performed in any order.
5. On August 1, 2012, CBFO distributed Revision 12 of DOE/WIPP 02-3184, *CH Packaging Operations Manual*, for use. Among the changes in Revision 12 were the following: Removal of O-ring removal/installation from the steps that may be performed in any order (Section 2.7.1).
6. To address the procedure violation that occurred at INL, the briefing initiated by the Transportation Manager included direction to waste operators not to accept spare parts that are not properly labeled. Operators are not responsible for the correctness of the purchase order number, but they are required to check that all required information is present before use. All MLU personnel involved in the conditions reported in CAR 12-026 attended the briefing and signed the rosters.
7. To address the procedure violation at the warehouse, WTS Packaging Engineering gave a briefing to warehouse personnel at the WIPP Site. The briefing included a reminder that they are to send individually-packaged, pre-labeled spare parts to MLU teams in the field, and to ensure that whenever spare parts are provided from bulk storage, the bag is marked with all required information. All MLU personnel involved in the conditions reported in CAR 12-026 attended the briefing and signed the rosters.
8. On August 1, 2012, CBFO distributed Revision 12 of DOE/WIPP 02-3184, *CH Packaging Operations Manual*, for use. Among the changes in Revision 12 were the following: Addition of the words "...and not damaged" to the inspection criteria for lift pocket tubes (Section 2.7.2).
9. The condition has been discussed with the waste operator who overlooked the cracked lift pocket tube, and with the rest of the waste operators at INL and the nonconforming tube has been replaced.

Based on the results of the review of the objective evidence included in the CAR 12-026 closure package, it is recommended that CAR 12-026 be closed.

Verification Performed By:  Greg Knox

25 OCT 2012
Date