



**Department of Energy**  
Carlsbad Field Office  
P. O. Box 3090  
Carlsbad, New Mexico 88221  
JAN 16 2013

 **ENTERED**



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

Subject: Evaluation of the CAP for CBFO CAR 13-003 from Audit A-13-02, Savannah River Site Central Characterization Project

Dear Mr. Gulbransen:

The Carlsbad Field Office (CBFO) has completed its evaluation of the Corrective Action Plan (CAP) associated with CBFO Corrective Action Report (CAR) 13-003. The results of the review indicate that the CAP is acceptable, as documented on the enclosed CAR Continuation Sheet. Upon completion of all corrective actions, please provide notification and documentation supporting closure of 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



cc: w/enclosure

J. Franco, CBFO	*ED
J.R. Stroble, CBFO	ED
T. Morgan, CBFO	ED
M. Pinzel, CBFO	ED
N. Castaneda, CBFO	ED
T. Reynolds, NWP/CCP	ED
D. K. Ploetz, NWP/CCP	ED
M. Sensibaugh, NWP/CCP	ED
V. Cannon, NWP/CCP	ED
A. J. Fisher, NWP/CCP	ED
C. Chester, NWP/CCP	ED
A. Johnson, NWP/CCP	ED
M. Percy, NWP/CCP	ED
R. Reeves, NWP/CCP	ED
T. Sellmer, NWP/CCP	ED
M. Walker, NWP/CCP	ED
J. Carter, NWP/CCP	ED
J. Hoff, NWP	ED
M. Mullins, NWP	ED
H. Crapse, DOE-SR	ED
T. Peake, EPA	ED
L. Bender, EPA	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
P. Martinez, CTAC	ED
P. Y. Martinez, CTAC	ED

WIPP Operating Record

CBFO QA File

CBFO M&RC

\*ED denotes electronic distribution

## CAR CONTINUATION SHEET

1. CAR No: 13-003

2. Activity No: A-13-02

3. Page 1 of 2

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

An evaluation was performed of the Corrective Action Plan (CAP) developed to address Carlsbad Field Office (CBFO) Corrective Action Report (CAR) 13-003. The CAP was submitted via Nuclear Waste Partnership LLC letter CP:13:00001 UFC:2300.00, dated January 2, 2013, from Mr. D. E. Gulbransen, Manager, National TRU Program Certification, 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**

*For reasons provided in Section 2.0 of this Corrective Action Plan, NTPC has determined that no remedial actions are necessary for the CAR condition.*

**Evaluation:**

The reasons provided in Section 2.0 of the CAP justify National TRU Program Certification's (NTPC's) decision to take no remedial actions.

**INVESTIGATIVE ACTIONS**

*CCP-TP-053. CCP Standard Real-Time Radiography (RTR) Inspection Procedure, Table 3.0, consists of a listing of items commonly found during RTR of TRU waste, along with nominal weights used by RTR Operators for consistency in reporting their results. Table 3.0 contains a line item for "Flashlight with Batteries" and another for "Flashlight without Batteries," with a different weight for each configuration. In accordance with Table 3.0 and their training, RTR Operators are expected to report flashlights with batteries as a single item entry on the RTR datasheet, with the single weight from the Table.*

*The fact that items in Table 3.0 are given one weight indicates that the entire weight of the items should be assigned to one Waste Material Parameter (WMP). RTR Operators have been trained to assign single items composed of different materials to the WMP that constitutes the bulk of the item. Flashlights with batteries would be assigned either to Plastic or Aluminum-Based Metal, depending on what the flashlight is made of. This is similar to the way leaded rubber gloves are treated: they are assigned entirely to Rubber because the lead makes up only a small part of the gloves.*

**Extent**

*NTPC has determined that RTR Operators are generally reporting flashlights with batteries in the manner described above, assigning one weight and one WMP. When RTR Operators were asked how they fill out RTR data sheets for flashlights with batteries, the Operators said they treat them as a single item, with one weight and one WMP. The Operator who completed the RTR data sheet in Example 2.0 of the CAR was unable to explain why he had done so: he stated that flashlights with batteries should be assigned a single weight and a single WMP.*

**Impact**

*As noted in the Condition Adverse to Quality section of the CAR, the issue is one of consistency in reporting RTR characterization results. Both of the methods described in the two Examples in the CAR are fully compliant with NTPC procedures and upper-tier requirements. The Table in CCP-TP-053 is set up to treat flashlight with batteries as a single item with a single weight, and therefore a single WMP, and this is the way RTR Operators are expected to report their results in RTR datasheets.*

### CAR CONTINUATION SHEET

1. CAR No: 13-003

2. Activity No: A-13-02

3. Page 2 of 2

**ROOT CAUSE DETERMINATION**

Not required by the CAR.

**ACTIONS TO PRECLUDE RECURRENCE**

*NTPC will give a briefing to RTR Operators, providing them with guidance on the assignment of waste material parameters and associated weights. The briefing will include the example of flashlights, with and without batteries.*

Evaluation:

A review of the proposed Actions to Preclude Recurrence associated with this CAP indicates that the proposed actions are acceptable.

**ACCEPTANCE**

The results of the evaluation of the CAP indicate that the proposed corrective actions satisfactorily address the conditions adverse to quality documented in CAR 13-003, and provide adequate measures to preclude recurrence. Therefore, it is recommended that the CAP for CAR 13-003 be approved.

Evaluation Performed By: Porf Martinez

Date: 1/15/13