



ENTERED

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

JUL 31 2013



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

Subject: Issuance of CARs 13-033 through 13-036 Resulting from CBFO Surveillance S-13-23

Dear Mr. Gulbransen:

The Carlsbad Field Office (CBFO) performed Surveillance S-13-23, Concern Classification Evaluation, on May 7-9, 2013. This surveillance was performed, in part, as an extent-of-condition review in response to CBFO Corrective Action Report (CAR) 13-023. CAR 13-023 identified an instance in which a concern identified during CBFO Audit A-13-02 of the Savannah River Site/Central Characterization Program was classified as an observation that should have been classified as a condition adverse to quality (CAQ). As a result of the surveillance, the CBFO discovered other instances during CBFO assessments in which concerns were similarly classified. Enclosed are CARs 13-033 through 13-036 addressing the instances identified in Surveillance S-13-23 whereby concerns identified during CBFO assessments should have been documented as CAQs.

Please provide a documented response for each of the enclosed 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) 234-7491.

Sincerely,

Dennis S. Miehl
Acting Director, Office of Quality Assurance

Enclosures

cc: w/enclosures

- | | | | |
|-----------------------|------|-----------------------|----|
| J. Franco, CBFO | * ED | S. Ghose, EPA | ED |
| J. R. Stroble, CBFO | ED | R. Lee, EPA | ED |
| M. Navarrete, CBFO | ED | J. Kieling, NMED | ED |
| T. Reynolds, NWP/CCP | ED | T. Kliphuis, NMED | ED |
| V. Cannon, NWP/CCP | ED | S. Holmes, NMED | ED |
| A. J. Fisher, NWP/CCP | ED | R. Maestas, NMED | ED |
| M. Walker, NWP/CCP | ED | C. Smith, NMED | ED |
| W. Ledford, NWP/CCP | ED | J. Harvill, CTAC | ED |
| J. Carter, NWP/CCP | ED | R. Allen, CTAC | ED |
| J. Hoff, NWP/QA | ED | B. Pace, CTAC | ED |
| B. Allen, NWP/QA | ED | P. Hinojos, CTAC | ED |
| M.A. Mullins, NWP/QA | ED | G. White, CTAC | ED |
| S. Punchios, NWP/QA | ED | Site Documents | ED |
| T. Peake, EPA | ED | WIPP Operating Record | ED |
| L. Bender, EPA | ED | CBFO QA File | |
| E. Feltcorn, EPA | ED | CBFO M&RC | |
| R. Joglekar, EPA | ED | *ED denotes ele | |

130728



CORRECTIVE ACTION REPORT

1. CAR No.: 13-033	2. Activity Report No.: S-13-23	3. Page 1 of 1
4. Controlling document: CCP-QP-002	5. CBFO Assessment Team Leader: D. Miehl	
6. Responsible organization: NWP/CCP		
7a. CAQ/CAR Owner (Office Director): N/A	7b. CAQ was discussed with: V. Cannon, M. Sensibaugh, M. Percy	
8. Requirement that is involved: CCP-QP-002, Section 4.1.2: "All training candidates are required to complete a Qualification Card to verify that they possess the knowledge and skills necessary to competently perform specified tasks."		
9. Condition Adverse to Quality (CAQ): The individual who performed the Site Project Manager (SPM) review of Remote-Handled (RH) Headspace Gas (HSG) Sampling Batch Data Report (BDR) SRHG 1102 was not listed on the List of Qualified Site Project Managers, dated 11/14/2011 (current one) as an RH Site SPM. In addition, the individual does not have a Qualification Card (FORM RH SPM-01) for "RH Sites." Concern identified during CBFO Audit A-12-04		
10. Suggested actions (Optional): N/A		
11a. Significant CAQ? (If 'Yes', go to block 15b) Yes <input type="checkbox"/> No <input checked="" 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 type="checkbox"/> No <input checked="" type="checkbox"/>	Root Cause Determination? Yes <input type="checkbox"/> No <input checked="" 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: TQ-06	13b. CAR Initiator: <u><i>Berry D. Face</i></u> (printed name) Barry D. Face	Date: <u>7/31/13</u>
14a. Response due date: <u>8-14-13</u>		
14b. Required corrective action completion date: <u>N/A</u>		
15. Concurrence:		
a. Assessment Team Leader (if applicable): <u><i>D. S. Miehl</i></u> (printed name) Dennis S. Miehl	Date: <u>7-31-13</u>	
b. CBFO Quality Assurance Director: <u><i>D. S. Miehl</i></u> (printed name) Dennis S. Miehl	Date: <u>7-31-13</u>	
16. Acceptance of Proposed Corrective Actions: _____ (printed name) _____ Date: _____		
17. Acceptance of Corrective Action Completion: _____ (printed name) _____ Date: _____		
18. Closure: _____ (printed name) _____ Date: _____		

CORRECTIVE ACTION REPORT

1. CAR No.: 13-034	2. Activity Report No.: S-13-23	3. Page 1 of 4
4. Controlling document: See Block 8	5. CBFO Assessment Team Leader: D. Miehls	
6. Responsible organization: NWP/CCP		
7a. CAQ/CAR Owner (Office Director): N/A	7b. CAQ was discussed with: V.Cannon, M. Sensibaugh, M. Pearcy	
8. Requirement that is involved: See Continuation Sheet		
9. Condition Adverse to Quality (CAQ): See Continuation Sheet		
10. Suggested actions (Optional): N/A		
11a. Significant CAQ? (If 'Yes', go to block 15b) Yes <input type="checkbox"/> No <input checked="" 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 type="checkbox"/> No <input checked="" 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 type="checkbox"/> No <input checked="" type="checkbox"/> Actions to Preclude Recurrence? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
13a. Trend Code: WP-06	13b. CAR Initiator: <u>Berry D. Face</u> <small>(printed name)</small>	Date: <u>7/31/13</u>
14a. Response due date: <u>8-14-13</u>		
14b. Required corrective action completion date: <u>N/A</u>		
15. Concurrence:		
a. Assessment Team Leader (if applicable): <u>Dennis S. Miehls</u> <small>(printed name)</small>		Date: <u>7-31-13</u>
b. CBFO Quality Assurance Director: <u>Dennis S. Miehls</u> <small>(printed name)</small>		Date: <u>7-31-13</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: 13-034

2. Activity No: S-13-23

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Block 8 – Requirement(s) that is Involved:

1. CCP-QP-008, Rev. 19, *CCP Records Management*, Step 4.3.1 states: *Verify that records are accurate to the work accomplished. (A-12-10)*
2. CCP-TP-113, Rev. 16, *CCP Standard Contact-Handled Waste Visual Examination*, Step 4.1.1 states: *Record Batch Data Report No. on Attachment 1, CCP Waste Visual Examination General Information Form, and Attachment 2, CCP Waste Visual Examination Data Form, (xxVEzzyyyy - where xx is the Site Identifier [e.g., LA for LANL], zz is the VE area identifier, and yyyy is a sequential number for that site). (A-12-11)*
3. CCP-QP-008, Rev. 19, *CCP Records Management*, Step 3.7.1 states: *[CCP Personnel] Generates the necessary records that document the activities assigned to them. Each individual who creates records must verify the record(s) are legible, accurate, and complete, appropriate to the work accomplished. (A-12-12)*
4. CCP-TP-053, Rev. 11, *CCP Standard Real-Time Radiography (RTR) Inspection Procedure*, Attachment 3, Question #10 asks the ITR: *Is all the data recorded clearly, legibly, and accurately? (A-12-12)*
5. CCP-TP-162, *CCP Random Selection of Containers for Solids and Headspace Gas Sampling and Analysis*, Rev. 1, Step 4.4.5 [B] states: *IF sampling cannot be performed on a selected container or Containers THEN prepare a Sample Selection Container Replacement Memorandum to include, as a minimum, the following information: ... (A-12-12)*
6. CCP-TP-001, *CCP Project Level Data Validation and Verification*, Rev. 19, Step 4.2.10 states: *IF any question is answered NA or NO, THEN provide justification in the Comments/Qualifiers Section of the appropriate SPM checklist, as applicable. (A-12-12)*
7. CCP-TP-053, Rev. 11, *CCP Standard Real-Time Radiography (RTR) Inspection Procedure*, Step 4.4.2 [H.2] states: *IF the waste form DOES NOT match the Waste Stream description and/or the Waste Matrix Code, THEN initiate an NCR in accordance with CCP-QP-005, AND record NCR number in Section 1 of Attachment 2 and a description in the Comments block. (A-12-12)*
8. CCP-QP-010, *CCP Document Preparation, Approval, and Control*, Rev. 23, Section 2.2.2 states: *Documents are reviewed for adequacy, correctness, and completeness prior to approval and issuance. (A-12-15)*
9. CCP-TP-001, Rev. 19, *CCP Project Level Data Validation and Verification*, Step 4.2.18 states: *If additional information is placed after an SPM checklist, then indicate, on the appropriate SPM checklist, that additional information is being provided, and paginate the inserted documentation to show which checklist it is associated with. (A-12-15)*
10. CCP-TP-106, Rev. 7, *CCP Headspace Gas Sampling Batch Data Report Preparation*, Attachment 3, ITR Review Checklist, question 18, states: *Verify all the data is signed and dated and the data is recorded clearly, legibly, and accurately. (A-12-15)*
11. CCP-TP-106, Rev. 7, *CCP Headspace Gas Sampling Batch Data Report Preparation*, Step 4.1, NOTE states: *HSG sampling personnel trained to CCP-TP-093 will assemble the Sampling BDR as described in this procedure. A Sampling BDR shall include all information listed in the Attachment 2, HSG Sampling Batch Data Report Table of Contents. If the HSG ITR review determines that any of these steps were NOT performed correctly, the HSG ITR will inform the HSG Drum Sampler of the corrections required. (A-12-15)*
12. CCP-TP-093, Rev. 16, *CCP Sampling of TRU Waste Containers*, Step 4.3.1, the NOTE after [A.9] states: *The documented filter hydrogen (H₂) diffusivity must be greater than or equal to the listed value to use the DAC for the listed filter H₂ diffusivity (e.g., a container with a filter H₂ diffusivity of 4.2 x 10⁶ must use a DAC for a filter with a 3.7 x 10⁶ filter H₂ diffusivity). If a filter H₂ diffusivity for a container is undocumented or unknown or is less than 1.9 x 10⁶ filter H₂ diffusivity, a filter of known H₂ diffusivity that is greater than or equal to 1.9 x 10⁶ filter H₂ diffusivity must be installed prior to initiation of the relevant DAC period. (A-12-15)*
13. CCP-QP-010, *CCP Document Preparation, Approval, and Control*, Rev. 23, Section 2.2.2 states: *Documents are reviewed for adequacy, correctness, and completeness prior to approval and issuance. (A-12-15)*
14. CCP-TP-093, Rev. 16, step 4.3.1 [A.13] states: *Package Configuration Group No. from Table 3 (Scenario 3 only) (NA for Scenario 1 or 2), and [A.16] (c) states: For Scenario 3 - Record the number of days for the SCG listed in Table 5 for the Packaging Configuration Group, hole diameter, and filter diffusivity. (A-12-15)*

CAR CONTINUATION SHEET

1. CAR No: 13-034

2. Activity No: S-13-23

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15. CCP-TP-513, Rev. 1, *CCP Procedure for Dimensional or Gravimetric Measurements for Radiological Characterization of Remote-Handled Transuranic Waste*, Section 3.4.1 states: *Reviews and approves the Radiological Documentation Package and completes Attachments 4 and 6, SPM Checklist. (A-12-16)*
16. CCP-TP-500, Rev. 11, *CCP Remote-Handled Waste Visual Examination*
 Section 1.1 states: *VE verifies the physical waste form, confirms the Waste Stream Description and Waste Matrix Codes provided by Acceptable Knowledge (AK)...*
 Section 4.1.2 [B] & [B.4] states: *...record the following in the Initial Container fields on a separate Attachment 1 for each small container: Waste Stream as listed in the AK Summary Report. (A-12-16)*
17. CCP-TP-500, Rev. 11, *CCP Remote-Handled Waste Visual Examination*, Section 4.4, states the SPM:
 4.4.3 *Review the BDR to the criteria in Attachment 3, and document on Attachment 3*
 4.4.5 *Forward the completed Attachment 3 to the Facility Records Custodian (A-12-16)*
18. CCP-TP-113, Rev. 16, *CCP Standard Contact-Handled Waste Visual Examination*, Step 4.4.5 [E] states: *Determine the contents by WMP category per Table 3, AND document as follows...* and Step 4.4.5, [E.2] states: *Weight of each WMP and the method used to determine the weight of the WMP from Table 4, as required. (A-13-02)*

Block 9 – Condition(s) Adverse to Quality

1. The title of source document U397 did not reflect the title listed in section 9.0 of the Acceptable Knowledge (AK) Summary Report. (A-12-10)
2. While reviewing the two Visual Examination (VE) Batch Data Reports (BDRs) (RLVEPF0035 and RLVEPF0036) the audit team noticed the sequential numbering of the BDRs was not in compliance with the procedure. The Site Project Manager (SPM) recorded the condition on an internal Nonconformance Report (NCR) to accurately document the numbering sequence. The VE recorded in BDR RLVEPF0036 was actually performed prior to the VE recorded in BDR RLVEPF0035. The audit team verified the VE activities were performed in sequence; however, the BDR numbers were incorrect. (A-12-11)
3. During the review of WIPP Waste Information System/Waste Data System (WWIS/WDS) data packages LAS833690, LAS833672, and LA0000055114, it was identified that some of the data (container type and shipping category) on the WDS Master Template.xls were different from the data on the WDS container data report. The data were changed in the WWIS/WDS database, but were not updated in the records package or on the WDS Master Template.xls. (A-12-12)
4. NCR-LANL-0972 was incorrectly recorded on the Real-Time Radiography (RTR) data sheet for Container S803940 in BDR LA-RTR2-12-0066. (A-12-12)
5. Four sample selection container replacement memoranda were written incorrectly (CP:11:1802, CP:11:1803, CP:11:1804 and CP:11:1805). The memoranda stated that the random selections were for solids when they were actually for headspace gas. (A-12-12)
6. In BDRs 2LANDA0832 and 3LANDA0063, question 19 of the CCP SPM Nondestructive Assay Project Level Validation Checklist and Summary was answered "N/A." However, no justification was recorded in the comments/qualifier section as required. (A-12-12)
7. During the RTR scan of container 66460, the RTR operator identified a battery as part of the container contents. The item (battery) was not identified as waste in the AK summary waste description. (A-12-12)
8. AK Summary Report CCP-AK-SNL-500, Rev. 4, does not address the final disposition of container number C980313 listed on page 28. In addition, DR1002 associated with that container is not addressed in the AK Summary Report in section 9.0, AK Source Documents. (A-12-15)

CAR CONTINUATION SHEET

1. CAR No: 13-034

2. Activity No: S-13-23

3. Page 4 of 4

9. During the review of SNL/CCP VE BDR SNLRHVE11007, the SPM provided additional information to the checklist and did not document the page number. (A-12-15)
10. In Headspace Gas (HSG) Sampling BDR SNHSG1102, page 3, the Independent Technical Reviewer (ITR) form is missing the step number in question 1. In question 5, the degree symbol was printed out as "N" in both temperature limit numbers. CCP-TP-106, Attachment 3, ITR Review Checklist, question 18 states: "Verify all the data is signed and dated and the data is recorded clearly, legibly, and accurately." (A-12-15)
11. The datalogger printouts for XC0855 and XC0856 provided in HSG Sampling BDR SNHSG1102, page 23, do not match the temperature recorder (XC0680) listed on the Sample Container Data Form, page 21, or the thermometer (XC0688) listed on the Chain-of-Custody (COC) form, page 6, nor is there any indication of where these extraneous datalogger printouts were obtained, or how/if they are relevant to this sampling event. (A-12-15)
12. In BDR SNHSG1102, the last entry in the Restrictive Hydrogen Diffusivity column of the Sample Container Data Form is missing a minus symbol before the 6. Instead, there is a period or decimal point. (A-12-15)
13. In CCP-AK-SNL-501, Rev. 2, Appendix A, step A.8.2, AK Source Documents, the Source Document Tracking Number U1036 is duplicated. The first document listed should have the number U1035. Inconsistencies were noted in the descriptions of the Source Documents listed on pages 29, 52, and 76 of CCP-AK-SNL-501, Rev. 2, versus the descriptions of those same Source Documents listed on Attachment 3 and Attachment 4 of CCP-TP-005. Other inconsistent descriptions were found in the following Source Documents: (A-12-15)
- U1032
 - U1036 (should be U1035)
 - U1036 (missing word)
 - U1039
 - U1029 (misspelled word on Att. 4)
 - U1034
 - U1040
 - U1041 (missing word)
 - U1044
14. In HSG Sampling BDR SNHSG1102, page 20, Attachment 2 of CCP-TP-093 has the Packaging Configuration Group incorrectly listed as 2. Sampling Scenario 3, with no layers of confinement (per the RH TRUCON, SN 321A), results in Packaging Configuration Group 1, which affects the Permit Required Equilibrium Time (from 11 days to 4 days). (A-12-15)
15. Although the SPM review was completed for BDR RHANLDG12004, it was completed and documented using CCP-TP-513, Attachment 3, Dimensional/Gravimetric Independent Technical Reviewer (ITR) Checklist. The information and questions on the two checklists are the same; however, the checklists are not interchangeable. (A-12-16)
16. During the review of BDR ANLRHVE12008, it was discovered that the VE operators listed items in the Waste Description section of Attachment 1, Visual Examination Data Form, that are not identified in the AK Summary Report (CCP-AK-ANLE-500, Rev. 10). The VE operators listed the subject items as "Clearboy" containers; however, the AK Summary Report only lists container descriptors for these containers as Chemical Waste Processing Containers (CWPCs), carboys, and liquid bulking containers (LBCs). Additionally, the audit team found two instances of different Waste Material Parameters (WMPs) being recorded for the "Clearboy" containers on Attachment 1, Visual Examination Data Form, for container RW 48260. Further interviews with VE personnel disclosed that these containers should be listed as "Plastics (P)." (A-12-16)
17. SPM checklist for VE BDR RHANLVE100015 was not complete. For Question 3, "Is the BDR complete (appropriately filled in forms for each container)?" neither "No" nor "Yes" was checked. (A-12-16)
18. During the review of BDR SRVEFW0361, it was discovered that in section 2 of the CCP Waste Visual Examination Data Form the VE operators listed an item that is not identified in the AK Summary (CCP-AK-SRS-8, Rev. 8). The VE operators listed the subject item as "Waste Lock"; however, the AK Summary does not list this item specifically. Absorbent is generally listed in the AK Summaries. (A-13-02)

CORRECTIVE ACTION REPORT

1. CAR No.: 13-035	2. Activity Report No.: S-13-23	3. Page 1 of 3
4. Controlling document: See Block 8	5. CBFO Assessment Team Leader: D. Miehls	
6. Responsible organization: NWP/CCP		
7a. CAQ/CAR Owner (Office Director): N/A	7b. CAQ was discussed with: V. Cannon, M. Sensibaugh, M. Percy	
8. Requirement that is involved: See Continuation Sheet		
9. Condition Adverse to Quality (CAQ): See Continuation Sheet		
10. Suggested actions (Optional): N/A		
11a. Significant CAQ? (If 'Yes', go to block 15b) Yes <input type="checkbox"/> No <input checked="" 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 type="checkbox"/> No <input checked="" 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 type="checkbox"/> No <input checked="" type="checkbox"/> Actions to Preclude Recurrence? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
13a. Trend Code: WP-05	13b. CAR Initiator: <u>Berry D. Pace</u> <small>(printed name)</small>	Date: <u>7/31/13</u>
14a. Response due date: <u>8-14-13</u>		
14b. Required corrective action completion date: <u>N/A</u>		
15. Concurrence:		
a. Assessment Team Leader (if applicable): <u>D. J. Miehls</u> <small>(printed name)</small> Dennis S. Miehls	Date: <u>7-31-13</u>	
b. CBFO Quality Assurance Director: <u>D. J. Miehls</u> <small>(printed name)</small> Dennis S. Miehls	Date: <u>7-31-13</u>	
16. Acceptance of Proposed Corrective Actions: _____ <small>(printed name)</small>		
17. Acceptance of Corrective Action Completion: _____ <small>(printed name)</small>		
18. Closure: _____ <small>(printed name)</small>		

CAR CONTINUATION SHEET

1. CAR No: 13-035

2. Activity No: S-13-23

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Block 8 – Requirement(s) that is Involved:

1. CCP-TP-500, Rev. 11, Section 4.1.2 states:

- [F] *IF VE of the container can NOT be completed by the original qualified operators that started the waste container for any reason, THEN STOP and notify the VE Expert.*
- [G] *Complete comment section of on Attachment 1, initial and date comments. New qualified operators SHALL initial and date comments for acceptance of waste previously placed into the waste container.*
- [H] *IF different qualified operators resume or complete the VE the operators will start a separate Attachment 1 at step 4.1.2[D], THEN completed Attachment 1 per CCP-TP-500, CCP Remote-Handled Waste Visual Examination. (A-12-13)*

2. CCP-QP-002, Rev. 32, Step 3.2.8 states: *[CCP Lead Site Project Manager (SPM)] ensures a CCP Trainee has completed all indoctrination reading prior to accessing operations/equipment. Step 3.2.10 states: [CCP Lead Site Project Manager (SPM)] ensures qualification and training documentation is complete. (A-12-15)*

3. CCP-TP-093, Sec. 2.6.1 specifies: *that the Field Blank ...shall be collected prior to sample collection, ... (A-12-15)*

4. CCP-TP-001, Sections:

4.3.6 Perform a review of the re-submitted data in accordance with Section 4.2.

4.3.7 Compare the original BDR submitted for the selected container with the re-submitted data.

4.3.8 Document the comparison, by interoffice memorandum, to CCP Records.

4.3.9 IF discrepancies or problems that affect data quality are noted during the review, THEN perform the following:

[A] Initiate an NCR in accordance with CCP-QP-005.

[B] Notify the appropriate facility personnel. (A-12-15)

5. CCP-TP-530, Rev. 10, Step 4.5.7 states: *Compile the following items used in the submission of data to the WWIS/WDS, AND submit to the CCP Records Custodian. (A-12-15)*

6. CCP-QP-002, Rev. 32:

Section 3.2.6 states: [CCP Lead Site Project Manager (SPM)] Reviews and approves CCP Qualification Cards.

Section 3.2.8[B] states: [CCP Lead Site Project Manager (SPM)] Ensures a CCP Trainee has completed all indoctrination reading prior to accessing operations/equipment.

Section 3.2.10 states: [CCP Lead Site Project Manager (SPM)] Ensures qualification and training documentation is complete... (A-12-16)

CAR CONTINUATION SHEET

1. CAR No: 13-035

2. Activity No: S-13-23

3. Page 3 of 3

Block 9 – Condition(s) Adverse to Quality:

1. Visual Examination (VE) Operators completing Batch Data Report (BDR) INLRHVE11003 did not follow step 4.1.2, section F, G, and H of CCP-TP-500. BDR INLRHVE11003, Containers FF-45A, B, C were signed by VE Operator 1 on 8/8/11 and by VE Operator 2 on 6/28/11. Idaho National Laboratory (INL)/Central Characterization Program (CCP) chose to continue with the original operator. Also, on Attachment 1 for containers FF-45A and FF-45B, the wrong procedure is referenced. The procedure should be CCP-TP-500, but is listed as CPP-TP-500. (A-12-13)
2. Review of Sandia National Laboratories (SNL)/CCP qualification cards revealed that the SPM signature approving the operator to perform the duties of the qualification card is dated prior to the verification performed by CCP Training for completion of briefings, comprehensive exams, and educational requirements. There were three instances in the objective evidence reviewed: one Visual Examination qualification card and two Waste Sampling Operator qualification cards. (A-12-15)
3. The Field Blank in Headspace Gas (HSG) Sampling BDR SNHSG1102 was collected simultaneously with the first sample and duplicate sample. CCP-TP-093, step 2.6.1 specifies that "Field blanks shall be collected prior to sample collection ..." (A-12-15)
4. The results of the HSG Sampling quarterly repeat of the data generation-level data package for the fourth quarter of 2011 has returned through the SPM re-review with no discrepancies noted. The audit has determined that although section 4.3 of CCP-TP-001 was followed correctly, the re-review did not produce discrepancies from the original review. The following are examples identified by the audit team that were not identified during the re-review. (A-12-15)
 - a. In HSGS BDR SNHSG1102, the ITR form, page 3 of the BDR, question #1 is missing the Step number and in question #5, the degree symbol has printed out as "N" in both temperature limit numbers.
 - b. The Field Blank in HSGS Batch SNHSG1102 was collected simultaneously with the first sample and duplicate sample.
 - c. The data logger printouts provided in HSGS Batch SNHSG1102, page 23, for XC0855 and XC0856 do not match up with the temperature recorder (XC0680) listed on the Sample Container Data Form page 21, or the thermometer (XC0688) listed on the Chain-of-Custody (COC) form page 6, nor is there any indication of where these extraneous data logger printouts were obtained or how or if they are relevant to this sampling event.
 - d. The last entry in the Restrictive Hydrogen Diffusivity column of the Sample Container Data Form is missing a minus before the 6, instead there is a period or decimal point.
5. WIPP Waste Information System/Waste Data System (WWIS/WDS) records packages have not been submitted to the CCP Records Custodian. (A-12-15)
6. During the review of the Argonne National Laboratory (ANL)/CCP qualification cards, it was identified that the SPM signature approving the operator to perform the duties of the qualification card is dated prior to the verification performed by CCP training for completion of briefings, comprehensive exams, and educational requirements. There were two instances in the objective evidence found (1 VE and 1 HSG qualification card). (A-12-16)

CORRECTIVE ACTION REPORT

1. CAR No.: 13-036		2. Activity Report No.: S-13-23		3. Page 1 of 2	
4. Controlling document: See Block 8		5. CBFO Assessment Team Leader: D. Miehl			
6. Responsible organization: NWP/CCP					
7a. CAQ/CAR Owner (Office Director): N/A		7b. CAQ was discussed with: V. Cannon, M. Sensibaugh, M. Pearcy			
8. Requirement that is involved: See Continuation Sheet					
9. Condition Adverse to Quality (CAQ): See Continuation Sheet					
10. Suggested actions (Optional): N/A					
11a. Significant CAQ? (If 'Yes', go to block 15b) 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 type="checkbox"/> No <input checked="" type="checkbox"/> Actions to Preclude Recurrence? 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 type="checkbox"/> No <input checked="" type="checkbox"/>					
11e. Does this CAQ affect waste streams BNINW216 or BNINW218? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>					
13a. Trend Code: WP-01		13b. CAR Initiator: <u><i>Berry D. Face</i></u> <small>(printed name)</small> Berry D. Face		Date: 7/31/13	
14a. Response due date: 8-14-13					
14b. Required corrective action completion date: N/A					
15. Concurrence:					
a. Assessment Team Leader (if applicable):		<u><i>D. S. Miehl</i></u> <small>(printed name)</small> Dennis S. Miehl		Date: 7-31-13	
b. CBFO Quality Assurance Director:		<u><i>D. S. Miehl</i></u> <small>(printed name)</small> Dennis S. Miehl		Date: 7-31-13	
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: 13-036****2. Activity No: S-13-23****3. Page 2 of 2****Block 8 – Requirement(s) that is Involved:**

1. CCP-QP-008, Rev. 20, Sec. 3.7.3 states: *Ensures that records are legible, accurate, and complete, appropriate to the work accomplished, when generating, reviewing, and validating records* and 4.3.1, *Verify that the records are accurate to the work accomplished. (A-12-15)*
2. CCP-QP-010, Section 2.2.2 states: *Documents are reviewed for adequacy, correctness, and completeness prior to approval and issuance. (A-12-15)*

Block 9 – Condition(s) Adverse to Quality:

1. Procedure CCP-TP-500, *CCP Remote-Handled Waste Visual Examination*, does not reference closure methods for layers of confinement as specified in RH-TRU Payload Appendices, Table 2.5-1. Sections 4.1.2[I.10] and 4.2.4[I] ask the Visual Examination (VE) operator to record the Closure Method(s) for the individual layers of confinement.

The VE operators recorded "filtered" as the closure method; however, "filtered" is not a specific description in the RH-TRU Payload Appendices, Table 2.5-1.

NOTE: CCP-TP-113, Rev. 16, *CCP Standard Contact-Handled Waste Visual Examination*, Table 2, defines the approved closure methods for layers of confinement. (A-12-15)

2. CCP-TP-106, *CCP Headspace Gas Sampling Batch Data Report Preparation*, step 4.1.2(A.11), Attachment 2 step 11, and Attachment 3, steps 15 and 18, all require "72-Hour Temperature Equilibration Plots" for calibrated items and the verification of these plots by signature and date. The procedure does not include information on how to obtain the plots. Therefore, the audit team was unable to determine how this information was obtained in order to be reported. (A-12-15)