



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



ENTERED

August 1, 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 CAR 13-051 Identified During Recertification Audit A-13-23,
LANL/CCP Waste Characterization Activities

Dear Mr. Gulbransen:

The Carlsbad Field Office performed Recertification Audit A-13-23 of the Los Alamos National Laboratory Central Characterization Program (LANL/CCP) waste characterization activities on July 23-25, 2013. Enclosed is Corrective Action Report (CAR) 13-051 addressing the condition adverse to quality identified during the audit.

Please provide a documented response for the CAR, ensuring that the required actions indicated in Block 12 are addressed, including a schedule for completion. Please return your responses to me on or before the due date identified in Block 14a.

If you have any questions concerning the CAR, please contact me at (575) 234-7491.

Sincerely,

Dennis S. Miehls
Acting Director, Office of Quality Assurance

Enclosure



Mr. D.E. Gulbransen

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AUG 1 2013

cc: w/enclosure

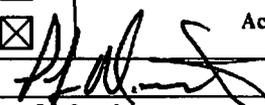
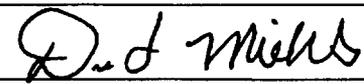
J. Franco, CBFO	*ED
J. R. Stroble, CBFO	ED
M. Navarrete, CBFO	ED
T. Morgan, CBFO	ED
N. Castaneda, CBFO	ED
L. Bishop, LASO	ED
F. Sharif, NWP	ED
T. Reynolds, NWP/CCP	ED
V. Cannon, NWP/CCP	ED
A. J. Fisher, NWP/CCP	ED
M. Walker, NWP/CCP	ED
W. Ledford, NWP/CCP	ED
J. Carter, NWP/CCP	ED
J. Hoff, NWP/QA	ED
B. Allen, NWP/QA	ED
S. Punchios, NWP/QA	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
C. Smith, NMED	ED
J. Harvill, CTAC	ED
R. Allen, CTAC	ED
B. Pace, CTAC	ED
P. Martinez, CTAC	ED
P. Hinojos, CTAC	ED
G. White, CTAC	ED
Site Documents	ED
WIPP Operating Record	ED

CBFO QA File

CBFO M&RC

*ED denotes electronic distribution

CORRECTIVE ACTION REPORT

1. CAR No.: 13-051	2. Activity Report No.: A-13-23	3. Page 1 of 2
4. Controlling document: CCP-TP-053 DOE/CBFO 94-1012	5. CBFO Assessment Team Leader: Dennis Miehl	
6. Responsible organization: NWP/CCP		
7a. CAQ/CAR Owner (Office Director): N/A	7b. CAQ was discussed with: Dale Simpson/Mike Sensibaugh/Craig Simmons	
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 checked="" type="checkbox"/> No <input type="checkbox"/> Actions to Preclude Recurrence? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
13a. Trend Code: RM05	13b. CAR Initiator:  (printed name) Porf Martinez	Date: 7/31/13
14a. Response due date: 8/15/13		
14b. Required corrective action completion date: N/A		
15. Concurrence:		
a. Assessment Team Leader (if applicable):  (printed name) Dennis S. Miehl		Date: 7/31/13
b. CBFO Quality Assurance Director:  (printed name) Dennis S. Miehl, Acting Director		Date: 7-31-13
16. Acceptance of Proposed Corrective Actions: _____		Date: _____
(printed name) _____		
17. Acceptance of Corrective Action Completion: _____		Date: _____
(printed name) _____		
18. Closure: _____		Date: _____
(printed name) _____		

CAR CONTINUATION SHEET

1. CAR No: 13-051

2. Activity No: A-13-23

3. Page 2 of 2.

8. Requirement that is involved:

The Carlsbad Field Office Quality Assurance Program Document, DOE/CBFO 94-1012, Section 2.1.1, states: "Line managers will ensure that personnel working under their supervision are qualified and are provided the necessary training, resources, and administrative controls to accomplish assigned tasks. Criteria describing acceptable work performance shall be defined for the worker."

CCP-TP-053, Revision 13, *CCP Standard Real-Time Radiography (RTR) Inspection Procedure*, Section 4.4.2 [H.1] states: "IF any hazardous waste(s) NOT identified in the AK Summary Report(s) for the waste stream being characterized OR any nonconforming/prohibited items are noted during the RTR examination, THEN perform the following: (a) Initiate an NCR in accordance with CCP-QP-005 AND record the NCR number in Section 1 and in the comments block of Attachment 2."

9. Condition Adverse to Quality (CAQ):

RTR Batch Data Report LA-HERTR-13-0048 (waste stream LA-MHD10.001) noted the presence of batteries, which were not expected to be present based on the associated Acceptable Knowledge (AK) Summary Report (CCP-AK-LANL-014). The presence of batteries was not determined to represent a concern by the RTR operator. Consequently, a nonconformance report (NCR) was not initiated for evaluation by the AK Expert. The presence of batteries, depending on the type, could necessitate the assignment of hazardous waste numbers as required. This condition suggests that the RTR operator did not possess sufficient knowledge to determine if the item identified was a hazardous waste requiring the initiation of an NCR.