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

ENTERED

AUG 15 2013

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

Subject: Evaluation of the CAP for CBFO CAR 13-036 from Surveillance S-13-23, Concern Classification Evaluation

Dear Mr. Gulbransen:

Enclosed are the results of the Carlsbad Field Office (CBFO) evaluation of the Corrective Action Plan (CAP) associated with CBFO Corrective Action Report (CAR) 13-036. The results of the review indicate that the CAP is acceptable. Upon completion, please provide notification and documentation supporting implementation of the corrective actions as noted in the CAP so that verification activities may be performed.

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

Sincerely,

Dennis S. Miehls
Senior Quality Assurance Specialist

Enclosure

cc: w/enclosure

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R. Allen, CTAC	ED
B. Pace, 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

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CBFO Form 3.1-2

CAR CONTINUATION SHEET

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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) 13-036. The CAP was submitted via Nuclear Waste Partnership LLC letter CP:13:01375, dated August 13, 2013, from Mr. D. E. Gulbransen, Manager, National TRU Program Certification, Central Characterization Program, to Mr. Dennis S. Miehls, Senior Quality Assurance Specialist, 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.

Condition 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 RHTRU 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)"*

REMEDIAL ACTIONS

For reasons discussed in the Impact section of this Corrective Action Plan, NTPC has determined that no Remedial Actions are required for the CAR condition.

Evaluation:

The justification for not taking remedial actions is deemed appropriate.

INVESTIGATIVE ACTIONS

Condition 1.0

Extent

The condition is limited to RH VE BDRs at SNL. At INL and ANL, RH VE operators have reported either "heat sealed filtered" or "N/A," as applicable for the specific containers being characterized (some containers have zero layers of confinement.

Impact

Each closure method in Table 2.5-1 is associated with a diffusivity that is calculated by the transportation group, to ensure that the right TRUCON code will be applied to the waste. For RH, each TRUCON code is developed using the information in the AK Summary Report and the scaling factors developed by the radiological engineer (unlike CH, the RH TRUCON codes are waste stream-specific). Because each RH TRUCON code is tailored to one RH waste stream, it is based on the diffusivities for the closure methods identified in AK for that waste stream, the TRUCON code will ensure that the shipment will meet the transportation requirements. The only way that a closure method could affect the TRUCON code would be if a Host location was using some new closure method that had not been covered in AK. This was not the case at Sandia; to date, RH has not used a closure method that was not listed in AK at any Host location. For the above reasons, there is no impact from this CAR condition.

Condition 2.0

Headspace Gas (HSG) Sampling is performed in accordance with CCP-TP-093, CCP Sampling of TRU Waste Containers. CCP-TP-106 governs the preparation of HSG BDRS, using the data collected in accordance with CCP-TP-093. The relationship between the two procedures is stated in CCP-TP-106 as follows:

> *"This procedure [CCP-TP-106] applies to personnel responsible for TRU waste container HSG Sampling BDR preparation and performance of data generation level reviews for sampling activities associated with CCP-TP-093, CCP Sampling of TRU Waste Containers." [Section 1.1]*
>
> *"Records generated in procedure CCP-TP-093...are included as part of the compilation of the Sampling BDR, **AND** are listed in Attachment 2." [Section 5.1]*

Attachment 2 to CCP-TP-106 is the template for the Table of Contents for the HSG Sampling Batch Data Report: Section 11.0 of the Table of Contents is "72-Hour Temperature Equilibration Plots."

The 72-hour equilibration time is discussed extensively in CCP-TP-093, and the form that requires the information to be documented is Attachment 2, page 2, from CCP-TP-093. The completed form becomes part of the sampling BDR in accordance with Section 11.0 of the Table of Contents: "Sample Drum Data Form (Attachment w from CCP-TP-093."

Extent

The condition applies to all HSG Sampling BDRs prepared in accordance with CCP-TP-106.

Impact

The information on how to obtain the 72-hour equilibration plots is clearly stated in CCP-TP-106 (see the sections quoted above). There is no impact from the Condition 2.0.

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There is the further consideration that both CCP-TP-093 and CCP-TP-106 are now obsolete, in response to the removal of chemical sampling from the NTPC program, following a March 13, 2013, modification to the Hazardous Waste Facility Permit.

Evaluation:

The investigative actions described above provide reasonable assurance that all necessary efforts were made to appropriately identify both the extent and impact of the condition. These actions are deemed acceptable.

ROOT CAUSE DETERMINATION

Not required by the CAR.

ACTIONS TO PRECLUDE RECURRENCE

Condition 1.0

NTPC will revise CCP-TP-500 to define approved closure methods for layers of confinement for containers for RH containers; the revision will incorporate the information currently in CCP-TP-113, Table 2, into CCP-TP-500.

Condition 2.0

The information on how to obtain 72-hour equilibration plots is clearly stated in procedure CCP-TP-106 (they come from CCP-TP-093). Both procedures are now obsolete, in response to the removal of chemical sampling from the NTPC program, following a March 13, 2013, modification to the Hazardous Waste Facility Permit.

For the above reasons, no actions to prevent recurrence are necessary for Condition 2.0.

Evaluation:

The actions to preclude recurrence have been deemed appropriate to address the conclusions reached by NTPC in the investigative actions described above.

ACCEPTANCE

The results of the evaluation of the CAP indicate that the proposed corrective action for Condition 1.0 is appropriate for addressing and correcting the condition, and the decision to not perform corrective action for Condition 2.0 is appropriate since the investigation revealed that the condition was invalid. Accordingly, it is recommended that the CAP for CAR 13-036 be approved.

Berry D. Pace 8/14/13

Evaluation Performed By: Berry D. Pace Date: