



United States Government

Department of Energy

memorandum

 Carlsbad Field Office
 Carlsbad, New Mexico 88221


DATE: DEC - 4 2013

REPLY TO
ATTN OF: CBFO:NTP:JRS:GL:13-0797:UFC 5900.00

SUBJECT: NTP Response to Evaluation of Impact for Accelerated CAR 14-006

TO: Oba Vincent, Acting Director, Office of Quality Assurance

The Office of the National Transuranic Program (NTP) has reviewed Corrective Action Report (CAR) 14-006. Based on the finding that this CAR should receive Accelerated Corrective Action, the NTP has evaluated the impact of this CAR in accordance with CBFO MP 3.1, Section 5.9. Specifically, the NTP evaluation of CARs requiring accelerated corrective action ensures that the NTP has evaluated waste received by the Waste Isolation Pilot Plant (WIPP) and waste awaiting shipment to WIPP, including a determination of whether waste shipments from the Transuranic (TRU) waste site should be suspended.

As noted in CAR 14-006, the finding was determined not to represent a Significant Condition Adverse to Quality (block 11a), and no Work Suspension was recommended (block 11b).

The CAR finding states that "Evidence could not be provided to confirm the appointment of a Visual Examination (VE) Expert during the timeframe in which VE was performed on the plutonium-beryllium sources in BDR #SRSRHVE13001."

The Central Characterization Program (CCP) Transuranic Waste Characterization Quality Assurance Project Plan (QAPjP), CCP-PO-001, Revision 21, section C1-2, describes the VE process using two VE Operators, and the training required of the operators. CCP-PO-001, section C1-2 also discusses the designation of the VE Expert: "The Site Project Manager (SPM) designates the VE experts. Designated VE experts are familiar with the waste-generating processes that have taken place at the site and waste types for waste being characterized at a particular site. VE experts are responsible for the overall direction and implementation of VE activities for the CCP at that site. VE experts meet the qualification and training requirements specified in CCP-QP-002 and make decisions based on training, previous experience, and knowledge of the waste stream." While the training and qualification of the two VE operators has been ascertained, CAR 14-006 notes that for this evolution, the VE Expert had not been designated as required by the SPM.

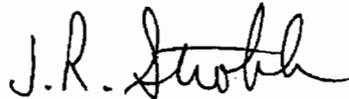
131207



NTP agrees that this finding represents a condition requiring accelerated corrective action, and pending the resolution of the corrective actions of CCP, provides the following evaluation of impact in accordance with CBFO MP 3.1, section 5.9:

- NTP has determined that no waste received or awaiting shipment from the Savannah River Site (SRS) is related to this waste stream. The waste stream in this instance has not been reviewed through the U.S. Environmental Protection Agency (EPA) Tier 1 approval process and is not eligible to ship.
- NTP does not recommend suspension of waste shipments from SRS. In this case, the VE operators that performed the work were qualified to perform the VE on this waste stream at SRS. The evolution required VE of the transfer of three special form capsules from Standard Waste Box storage into the containers that will be loaded into the Removable Lid Canister to ship in a 72-B cask. The SRS VE Expert usually assigned to the site did not participate in this evolution and was not briefed on the Acceptable Knowledge (AK) Summary Report. CCP Training discovered that the VE Expert assigned to the evolution was not properly appointed to the position IAW CCP-PO-001, C1-2 prior to the work. After ensuring the VE expert had all required training prior to the evolution, aside from the proper appointment, the training record was completed after the VE was complete. The SPM appointment of the VE expert prior to performing the work did not affect the actual work which was performed. No other findings concerning waste shipments from SRS have been noted.

If you have any questions, please contact Tom Morgan at (575) 234-7462.



J.R. Stroble, Director
Office of the National TRU Program

Mr. Oba Vincent

-3-

DEC - 4 2013

cc:

J.R. Stroble, CBFO	* ED
N. Castaneda, CBFO	ED
D. Miehl, CBFO	ED
T. Morgan, CBFO	ED
M. Navarrete, CBFO	ED
M. Pinzel, CBFO	ED
O. Vincent, CBFO	ED
D. Moody, DOE-SR	ED
H. Crapse, DOE-SR	ED
B. Allen, NWP	ED
V. Cannon, NWP	ED
J. Carter, NWP	ED
S. Escareno-Soto, NWP	ED
A. J. Fisher, NWP	ED
J. Hoff, NWP	ED
I. Joo, NWP	ED
W. Ledford, NWP	ED
R. Lee, NWP	ED
M. Percy, NWP	ED
S. Punchios, NWP	ED
T. Reynolds, NWP	ED
F. Sharif, NWP	ED
M. Walker, NWP	ED
T. Peake, EPA	ED
L. Bender, EPA	ED
E. Feltcorn, EPA	ED
S. Ghose, EPA	ED
R. Joglekar, EPA	ED
R. Lee, EPA	ED
J. Kieling, NMED	ED
T. Kiphuis, NMED	ED
S. Holmes, NMED	ED
R. Maestas, NMED	ED
C. Smith, NMED	ED
J. Harvill, CTAC	ED
R. Allen, CTAC	ED
P. Hinojos, CTAC	ED
B. Pace, CTAC	ED
G. White, CTAC	ED

CBFO M&RC

*ED denotes electronic distribution