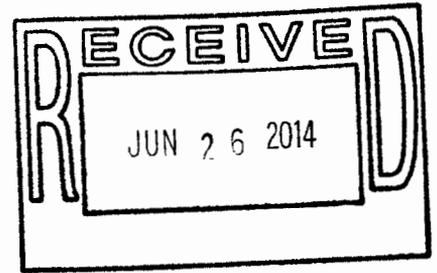




Department of Energy
Carlsbad Field Office
P. O. Box 3090
Carlsbad, New Mexico 88221
JUN 26 2014



Mr. Jon E. Hoff, Manager
Quality Assurance
Nuclear Waste Partnership LLC
P.O. Box 2078
Carlsbad, New Mexico 88221-2078

Subject: Issuance of CARs 14-044, 14-046, and 14-047 Identified During Audit A-14-18,
INL/CCP Characterization and Certification Activities for CH and RH TRU Waste

Dear Mr. Hoff:

The Carlsbad Field Office (CBFO) performed Recertification Audit A-14-18, Idaho National Laboratory (INL) Central Characterization Program (CCP) Characterization and Certification Activities for Contact-Handled (CH) and Remote-Handled (RH) Transuranic (TRU) Waste on June 3-5, 2014. Enclosed are Corrective Action Reports (CARs) 14-044, 14-046, and 14-047 addressing the conditions adverse to quality identified during the audit.

Please provide documented responses for the 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 for each of these CARs.

If you have any questions concerning CARs 14-044, 14-046, or 14-047, please contact me at (575) 234-7491.

Sincerely,

Dennis S. Miehl
Senior Quality Assurance Specialist

Enclosures



Mr. Jon E. Hoff

-2-

JUN 26 2014

cc: w/enclosures
M. Brown, CBFO *ED
J.R. Stroble, CBFO ED
M. Navarrete, CBFO ED
M. Pinzel, CBFO ED
T. Morgan, CBFO ED
N. Castaneda, CBFO ED
J. Cooper, DOE-ID ED
J. Wells, DOE-ID ED
R. Blythe, DOE-ID ED
R. McQuinn, NWP ED
J. Blankenhorn, NWP ED
J. Harris, NWP ED
F. Sharif, NWP ED
D. E. Gulbransen, NWP ED
V. Cannon, NWP/CCP ED
A.J. Fisher, NWP/CCP ED
I. Joo, NWP/CCP ED
M. Walker, NWP/CCP ED
W. Ledford, NWP/CCP ED
J. Carter, NWP/CCP ED
B. Allen, NWP/QA ED
S. Punchios, NWP/QA ED
S. Escareno-Soto, 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
V. Daub, CTAC ED
R. Allen, CTAC ED
P. Martinez, CTAC ED
B. Pace, CTAC ED
T. Ackman, CTAC ED
C. Castillo, CTAC ED
D. Blauvelt, CTAC ED
C. Roberts, CTAC ED
R. Kantrowitz, NWP ED
P. Hinojos, CTAC ED
G. White, CTAC ED
Site Documents ED
CBFO QA File
CBFO M&RC

*ED denotes electronic distribution

CORRECTIVE ACTION REPORT

1. CAR No.: 14-044	2. Activity Report No.: A-14-18	3. Page 1 of 1
4. Controlling document: CCP-TP-019 CCP-TP-115	5. CBFO Assessment Team Leader: Dennis Miehl	
6. Responsible organization: INL/CCP		
7a. CAQ/CAR Owner (Office Director): N/A	7b. CAQ was discussed with: Ed Gulbransen Preston Abbott	
<p>8. Requirement that is involved: CCP-TP-019, <i>CCP Waste Assay Gamma Spectrometer (WAGS) Operating Procedure</i>, Rev. 6, section 2.2.1: "Personnel must have read CCP-HSP-013, <i>CCP Waste Assay Gamma Spectrometer (WAGS) and SWEPP Gamma-Ray Spectrometer (SGRS) Nondestructive Assay Systems Health and Safety Plan</i>."</p> <p>CCP-TP-115, <i>CCP SWEPP Gamma-Ray Spectrometer (SGRS) Operating Procedure</i>, Rev. 5.1, section 2.2.2: "Personnel must have read CCP-HSP-013, <i>CCP Waste Assay Gamma Spectrometer (WAGS) and SWEPP Gamma-Ray Spectrometer (SGRS) Nondestructive Assay Systems Health and Safety Plan</i> prior to performing this procedure."</p>		
<p>9. Condition Adverse to Quality (CAQ): No objective evidence was provided to document required indoctrination training/reading of CCP-HSP-013, CCP WAGS and SGRS Health and Safety Plan for three Nondestructive Assay (NDA) SGRS Operators and three NDA WAGS Operators, as required by the respective operating procedures.</p> <p>Also, the required indoctrination training/reading of CCP-HSP-013 is not listed on the current revisions of the NDA SGRS and NDA WAGS qualification cards.</p>		
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: TQ-04	13b. CAR Initiator: <u><i>Cindi Castillo</i></u> (printed name) Cindi Castillo	Date: <u>6/24/14</u>
14a. Response due date: <u>7-10-14</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>6-25-14</u>
b. CBFO Quality Assurance Director: <u><i>Michael R. Brown</i></u> (printed name) Michael R. Brown		Date: <u>6/25/14</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.: 14-046	2. Activity Report No.: A-14-18	3. Page 1 of 1
4. Controlling document: CCP-QP-010, CCP Document Preparation, Approval, and Control, Revision 24	5. CBFO Assessment Team Leader: Dennis S. Miehl	
6. Responsible organization: Central Characterization Program		
7a. CAQ/CAR Owner (Office Director): N/A	7b. CAQ was discussed with: Tyson Christenson, Rich Kantrowitz, Irene Joo, Ed Gulbransen	
8. Requirement that is involved: Section 4.2 (NOTE) of CCP-QP-010, <i>CCP Document Preparation, Approval, and Control</i> , Revision 24, states, "Approved documents must be used to ensure that tasks are performed in a consistent manner that results in achieving the quality required. At the beginning of each shift, CCP personnel will confirm the current revision of the document is being used. This revision of the document will be used throughout the shift unless a STOP WORK order is issued."		
9. Condition Adverse to Quality (CAQ): CCP-AK-INL-580, Revision 4, was issued on March 14, 2014, and is the current revision. During the RTR characterization scan of container FCO104A-2, the obsolete revision (Rev. 3) was observed in use during the scan. Note: A similar condition was identified during ORNL/CCP Audit A-14-03 as documented in CBFO CAR 14-009. This CAR is classified as "Significant" based on the following criteria: "Repeated attempts to resolve a CAQ have been unsuccessful".		
10. Suggested actions (Optional): <i>N/A</i>		
11a. Significant CAQ? (If 'Yes', go to block 15b) 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"/>	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"/>
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: RTR-05	13b. CAR Initiator: <i>Juan D. Ackman Jr</i> (printed name) Porf Martinez	
	Date: 6/25/14	
14a. Response due date: 7-10-14		
14b. Required corrective action completion date: <i>N/A</i>		
15. Concurrence:		
a. Assessment Team Leader (if applicable): <i>D. S. Miehl</i> (printed name) Dennis S. Miehl	Date: 6-25-14	
b. CBFO Quality Assurance Director: <i>Michael R. Brown</i> (printed name) Michael R. Brown	Date: 6/25/14	
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.: 14-047	2. Activity Report No.: A-14-18	3. Page 1 of 2
4. Controlling document:	CCP-TP-005, CCP Acceptable Knowledge Documentation, Revision 26	5. CBFO Assessment Team Leader: Dennis S. Miehls
6. Responsible organization: Idaho National Laboratory/Central Characterization Program (INL/CCP)		
7a. CAQ/CAR Owner (Office Director):	N/A	7b. CAQ was discussed with: Scott Smith Trey Greenwood
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: AK-06	13b. CAR Initiator: _____ Date: _____ <i>Charleen Roberts</i> for _____ 6/25/14 (printed name) Charleen Roberts	
14a. Response due date: 7-10-14		
14b. Required corrective action completion date: N/A		
15. Concurrence:		
a. Assessment Team Leader (if applicable): _____ Date: _____ <i>D. S. Miehls</i> 6-25-14 (printed name) Dennis S. Miehls		
b. CBFO Quality Assurance Director: _____ Date: _____ <i>Michael R. Brown</i> 6/25/14 (printed name) Michael R. Brown		
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: 14-047

2. Activity No: A-14-18

3. Page 2 of 2

Block # 8 - Requirement That Is Involved

CCP-TP-005, *CCP Acceptable Knowledge Documentation*, Revision 26, section 4.4.16, "Review the AK information to determine if the waste is listed under 20 NMAC 4.1.200 (incorporating 40 CFR 261.30), Subpart D. If so, assign the appropriate HWNs." Section 4.4.17, "Review the AK information to determine if a toxicity characteristic 20 NMAC 4.1.200 (incorporating 40 CFR 261.20), Subpart C contaminant is identified and has NOT been assigned a listed HWN from step 4.4.16. Evaluate the available data and assign the toxicity characteristic HWN consistent with RCRA requirements. Section 4.4.20, "Include the justification and basis for steps 4.4.16 and 4.4.17 in the TRU waste stream-specific description of AK Summary Report, AND complete the Attachment 5."

Block # 9 - Condition Adverse to Quality (CAQ)

The toxicity characteristic (TC) metals arsenic, chromium, cadmium and lead were detected through spectral analysis of blanket bricks associated with the waste stream. Detections of these TC metals are documented in AK Source Document P838, *Casting of Blanket Bricks, Ring, Plug, and Control Rods for the Experimental Breeder Reactor*. The justification and basis for assigning or not assigning the TC HWNs associated with these metals are not identified in the waste-stream-specific description of *CCP-AK-INL-600, Central Characterization Program Acceptable Knowledge Summary Report For Remote-Handled Transuranic Debris From Experimental Breeder Reactor at the Idaho National Laboratory, Waste Stream ID-EBR-S5000*, Revision 1. Neither the presence of the TC metals or results of TC HWN assignment are documented in Attachment 5 of the AK Summary Report.

INSTRUCTIONS FOR PROVIDING CORRECTIVE ACTION PLAN

WASTE ISOLATION PILOT PLANT
U.S. DEPARTMENT OF ENERGY
Carlsbad Field Office

**INSTRUCTIONS FOR COMPLETING A CORRECTIVE ACTION PLAN IN
RESPONSE TO A CAR ADDRESSING A CONDITION ADVERSE TO QUALITY**

You are requested to provide a corrective action plan in response to this corrective action report (CAR) by the due date identified in block 14a of the CAR. If this date cannot be met, provide a written request for extension to the assessment team leader (CAR block 5). This request must include justification for the delay and must be provided prior to the response due date (CAR block 14a).

The corrective action plan shall address the corrective actions indicated in CAR block 12. As appropriate, develop the plan in accordance with the following sequence and format:

In order to develop the corrective action plan, perform an investigative action to determine the extent and impact of the deficiency and to identify the root cause. Next, determine the actions required to correct the adverse condition. The plan shall include the following information, as appropriate to CAR block 12.

1. Corrective action response for CAR # 14-044, 14-046; and 14-047
 - A. **Remedial Actions**-Describe actions required or taken to correct the specific conditions noted and any similar conditions identified during the investigations.
 - B. **Investigative Actions**-Describe the investigative actions performed to determine the extent and impact of the deficiency and the results of the investigation. This will include a determination of the acceptability of any data generated prior to resolution of the deficiency.
 - C. **Root Cause Determination**-Identify the root cause of the condition as determined through investigative actions.
 - D. **Actions to Preclude Recurrence**-Identify the corrective actions required to address the root cause of the condition in order to preclude recurrence.
2. For each action above, identify the individual assigned responsibility for completion of the action and the anticipated (or actual, if complete) completion date.
3. The response must identify the individual having the overall responsibility for completion of the corrective actions.

NOTE: The documentation to support corrective action completion is not to be submitted with the corrective action plan and shall not be submitted until the corrective action plan is approved.