



United States Government

Department of Energy

memorandum

FEB 29 2016

Carlsbad Field Office
Carlsbad, New Mexico 88221

DATE: FEB 29 2016

REPLY TO
ATTN OF: CBFO:OQA:MPN:BA:16-1270:UFC 2300.00

SUBJECT: Evaluation of the CAP for CBFO CAR 16-008 Resulting from CBFO Audit A-16-01

TO: Mr. Benjamine Roberts, DOE-ID

Attached are the results of the Carlsbad Field Office (CBFO) evaluation of the Corrective Action Plan (CAP) associated with CBFO Corrective Action Report (CAR) 16-008. As documented on the enclosed CAR Continuation Sheets, the evaluation indicates that the CAP does not provide adequate measures to address and reduce the likelihood of the condition noted in the CAR. Please revise and resubmit the CAP for review and approval.

If you have any questions or comments concerning the evaluation, please contact me at (575) 234-7483.

Martin P. Navarrete

Senior Quality Assurance Specialist

Attachment

cc: w/attachment

M. Brown, CBFO	*ED	E. Feltcorn, EPA	ED
J.R. Stroble, CBFO	ED	R. Joglekar, EPA	ED
D. Miehl, CBFO	ED	J. Kieling, NMED	ED
N. Castaneda, CBFO	ED	R. Maestas, NMED	ED
G. Birge, CBFO	ED	C. Smith, NMED	ED
T. Carver, CBFO	ED	V. Daub, CTAC	ED
S. Ross, EM-43	ED	R. Allen, CTAC	ED
J. Zimmerman, DOE-ID	ED	P. Martinez, CTAC	ED
M. Willcox, DOE-ID	ED	B. Pace, CTAC	ED
T. Jenkins, DOE-ID	ED	C. Castillo, CTAC	ED
B. Blyth, DOE-ID	ED	P. Hinojos, CTAC	ED
D. Haar, AMWTP	ED	G. White, CTAC	ED
G. Byram, AMWTP	ED	Site Documents	ED
G. Tedford, AMWTP	ED	CBFO QA File	
A. Morse, AMWTP	ED	CBFO M&RC	
T. Peake, EPA	ED	*ED denotes electronic distribution	
L. Bender, EPA	ED		

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CAR CONTINUATION SHEET

1. CAR No: 16-008

2. Activity No: A-16-01

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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) 16-008. The CAP was submitted via Idaho Treatment Group (ITG) letter C-2015-0352, dated November 23, 2015, from Mr. David H. Haar, Waste Programs Manager and AMWTP Deputy Project Manager, to Mr. Martin Navarrete, Senior Quality Assurance Specialist, CBFO Office of 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.

REMEDIAL ACTIONS

No remedial actions required.

Evaluation: Not accepted.

AMWTP needs to identify the appropriate compensatory measures planned/taken to control the condition in the CAR until the revision of INST-OI-12 is implemented for characterizing S3000 solids as committed to in the Actions to Preclude Recurrence.

INVESTIGATIVE ACTIONS

1. *Investigative actions identified that this issue is not RCRA related nor does this issue rise to the level of a significant condition adverse to quality.*
2. *The RTR equipment at AMWTP does not generate sufficient energy to penetrate the center portion of the drum. Instead, as the drum is rotated, RTR provides a clear image on the outside edge, where the density is at a minimum, and becomes increasingly opaque as the image moves to the centerline of the drum, where the density is at a maximum. The AK for this waste stream is the key to why this has been accepted; this is a waste stream generated at Rocky Flats from a production line process, where the waste form and content were consistent from drum to drum. This has been confirmed by the processing of well over 10,000 of these containers, some as far back as when VE was used to confirm mis-cert rates, and several thousand recently sent through an ARP drum repackaging station as part of the Sludge Repack Project. This project involved the repackaging and VE of 6000 drums, and during the entire campaign, no prohibited items were found in the drums that had not already been identified by RTR. These containers were being repacked almost exclusively to address liquids in excess of 1%, either by condensation or from separation of the liquid from the solids matrix, which is a condition that can clearly be identified by RTR, as the free liquids migrate to the bottom of the container, and can be seen along the edges when present. Thus, AK supports the position that VE would not provide additional relevant information to the RTR examination, and AMWTP has trained the operators accordingly.*
3. *Impenetrable objects are not a prohibited item. NCRs are written for impenetrable objects that prevent full examination of the container. Based on AK for associated IDCs; operators have been trained to answer 'no' to the impenetrable objects question as AK supports that visual examination would provide no additional relevant information.*

Evaluation: Items 1, 2, & 3 Accepted. Additional investigative actions required.

Discussions were held with the Waste Management Senior Technical Advisor on how to characterize S3000 sludge waste using RTR and how visual examination was to be performed on S3000 sludge waste. After further review of

CAR CONTINUATION SHEET

1. CAR No: 16-008

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the RTR tape media that was supplied by AMWTP it was confirmed that visual examination would not provide additional relevant information for that container based on the acceptable knowledge information for the waste stream. The Waste Management Senior Technical Advisor concluded that the process supported by the review of the tape media satisfies the WAP Data Quality Objectives (DQO's)

Additional investigative actions required:

- AMWTP must perform additional investigative actions to address conduct of operations issues associated with procedure compliance and inconsistencies in RTR operator identification of nonconforming conditions and associated training.
- AMWTP must perform additional investigative actions to address RTR operator inconsistencies when initiating an NCR for impenetrable waste. During the audit, the audit team observed RTR certification scans performed by different operators on containers 10563430 (IDC RF-001, S3121 Sludge) and 10563396 (IDC BN511, S3900 Solids). Both operators identified impenetrable waste; one operator initiated an NCR the other did not.

ROOT CAUSE DETERMINATION

1. A review of INST-OI-12, Real-Time Radiography Examinations (Certification Scans), Rev. 57, Section 4.6.36.1 has determined that the procedure needs to provide specific direction regarding when NCRs shall be initiated for impenetrable objects and include information as to why sludge containers do not require NCRs and 'impenetrable objects' is answered no. Root cause determination: A5 Communications LTA/B2 Written Communication Content LTA/C05 Ambiguous instructions/requirements.

Evaluation:

Root cause determination is acceptable based on NTP (TSTD) WAP interpretation and investigative actions.

ACTIONS TO PRECLUDE RECURRENCE

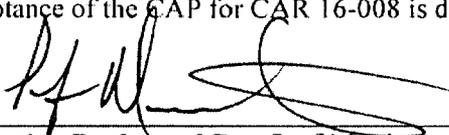
1. *Revise INST-OI-12, Real-Time Radiography Examinations (Certification Scans) to provide specific direction regarding when NCRs shall be initiated for impenetrable objects and include information as to why sludge containers do not require NCRs and 'impenetrable objects' is answered no.*

Evaluation: Item 1 Accepted. Additional actions to preclude recurrence are required.

AMWTP also must provide training to RTR operators regarding the newly revised procedure including changes affected by this CAR. This training must be documented and attendance sheets included in the CAR closure package.

ACCEPTANCE

Acceptance of the CAP for CAR 16-008 is denied for the reasons described within this evaluation.



Evaluation Performed By: Porf Martinez

2/24/2016

Date: