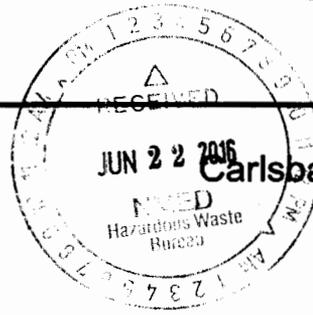


United States Government

Department of Energy

# memorandum

Carlsbad Field Office  
Carlsbad, New Mexico 88221



DATE: JUN 22 2016

REPLY TO  
ATTN OF: CBFO:OQA:MRB:BA:16-1299:UFC 2300.00

SUBJECT: Evaluation of the Revised 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 revised Corrective Action Plan (CAP), dated May 4, 2016, associated with CBFO Corrective Action Report (CAR) 16-008. As documented on the attached CAR Continuation Sheets, the evaluation indicates that the revised CAP provides adequate measures to address and reduce the likelihood of the condition noted in the CAR. Therefore, the CAP for CAR 16-008 is approved.

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

  
Michael R. Brown, Director  
CBFO, Office of Quality Assurance

### Attachment

cc: w/attachment

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

160614



### CAR CONTINUATION SHEET

1. CAR No: 16-008

2. Activity No: A-16-01

3. Page 1 of 3

#### **Block #15 Acceptance of Proposed Corrective Actions:**

An evaluation was performed of the Corrective Action Plan (CAP), Revision 2, developed to address Carlsbad Field Office (CBFO) Corrective Action Report (CAR) 16-008. The revised CAP was submitted via Idaho Treatment Group (ITG) letter C-2016-0167, dated May 4, 2016, from Mr. David J. Richardson, President and AMWTP Project Manager, to Mr. Martin Navarrete, Senior Quality Assurance Specialist, CBFO Office of Quality Assurance.

*Italicized text, taken verbatim from the revised CAP, is used to reflect the correlation between the actions required by the CAR and the method used for evaluation.*

#### **REMEDIAL ACTIONS**

*Document change request 14531 was drafted on 11-15-2015 to correct the issues. No remedial actions were taken. A Timely Order (MP-COPS-9.13, Section 3.1) cannot be used to change or supplement operating procedures.*

**Evaluation:** Accepted.

#### **INVESTIGATIVE ACTIONS**

- 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.*
- 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.*
- 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.*
- AMWTP is generating RTR Impenetrable Object NCRs when required. TrackWise was queried and 1,687 NCRs, for impenetrable objects were initiated October 1, 2014 through October 31, 2015. Query results are attached.*

**CAR CONTINUATION SHEET**

<b>1. CAR No:</b> 16-008	<b>2. Activity No:</b> A-16-01	<b>3. Page 2 of 3</b>
--------------------------	--------------------------------	-----------------------

- Additional investigation has been completed for concern related to conduct of operations issues associated with procedure compliance and inconsistencies in RTR operator identification of nonconforming conditions and associated training. ITG's investigation determined that although the correct actions were taken by the RTR operators, there is enough ambiguity within the procedure to pose a concern. Accordingly, ITG will clarify the operating procedure, and provide additional training to the operators to alleviate this concern.*
- The RTR certification scans performed during the audit were performed on homogenous waste containers from two different IDC's, RF-001 and BN-511. RF001 is in the inorganic sludge stream from Rocky Flats generated in Building 774, and consists of first and second stage sludge from the precipitation of aqueous liquids. The BN-511 is a default type of IDC, used to indicate that although the waste form can be confirmed as a homogenous solid, the AK is insufficient to assign the drum to a specific waste stream. INST-OI-12, section 4.6.40, instructs the operator to verify the physical form of the waste is consistent with the IDC, WMC, summary category and waste stream description (as defined in RPT-TRUW-05) or for waste NOT covered in RPT-TRUW-05, other approved applicable AK documents and reports. When the RF-001 container was inspected, no indications of prohibited items or conditions were identified. Because all solids have the impenetrable issue, the operator then reviewed RPT-TRU-05, which states "Visual examination of this bulk or direct loaded sludge packaged in 55, 83, or 85-gallon drums would not provide additional relevant information to the RTR examination." In accordance with his training, he therefore answered the impenetrable question as "No". Similarly, when the BN-511 container was inspected, no prohibited items or conditions were identified. But for this container, when the operator reviewed RPT-TRUW-05, there is no corresponding statement that says VE is not required. In accordance with his training, he therefore answered the impenetrable question as "yes-unacceptable", and the NCR was generated. This system was designed to make this process as simple as possible for the RTR operators, minimizing the chance for error. While ITG still considers this appropriate, we recognize the risk of oversimplification. Accordingly, we will implement corrective actions to clarify procedural steps and provide additional training.*

**Evaluation:** Accepted.

**ROOT CAUSE DETERMINATION**

- 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:** Accepted.

### CAR CONTINUATION SHEET

1. CAR No: 16-008

2. Activity No: A-16-01

3. Page 3 of 3

#### ACTIONS TO PRECLUDE RECURRENCE

1. *Revise INST-OI-12, Real-Time Radiography Examinations (Certification Scans) to provide specific direction regarding examination of S3000 waste.*
2. *A documented briefing shall be provided to RTR operators regarding recent changes of INST-OI-12 once procedure approval is received and the document can be issued.*

**Evaluation:** Accepted.

#### ACCEPTANCE

The actions as described in the revised CAP were subject to discussions between the CBFO Office of Quality Assurance and CBFO Manager's Office. As a result, the CAP evaluation indicates that the remedial actions, investigative actions, and actions to preclude recurrence satisfactorily address the condition adverse to quality documented in CAR 16-008, and provide adequate measures for precluding recurrence. Therefore, it is recommended that the revised CAP for CAR 16-008 be approved.



6/20/2016  
Date:

Evaluation Performed By: Porf Martinez