



United States Government

Department of Energy

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# memorandum

Carlsbad Field Office  
Carlsbad, New Mexico 88221

**DATE:** MAY 15 2019

**REPLY TO  
ATTN OF:** CBFO:OQA:MPN:SA:19-0892 UFC 2300.00

**SUBJECT:** Acceptance of Closure Documentation for CBFO CAR 18-053 from Audit A-18-04,  
AMWTP Recertification

**TO:** James A. Malmo, DOE-ID

The Carlsbad Field Office (CBFO) has completed its review and verification of completion of the corrective actions associated with CBFO Corrective Action Reports (CAR) 18-053. The results of the verification are documented in the attached CAR Continuation Sheets, and indicate that the documentation of completion of corrective actions is acceptable.

The verification concluded that the associated corrective actions are acceptable. The CAR is considered closed.

If you have any questions concerning CAR 18-053, please contact me at (575) 234-7483.

Martin P. Navarrete  
Senior Quality Assurance Specialist

Attachment

190512



J. Malmo, DOE-ID

- 2 -

**MAY 15 2019**

cc: w/attachment

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R. Fitzgerald, CTAC	ED
P. Hinojos, CTAC	ED
G. White, CTAC	ED
Site Documents	ED
CBFO QA File	
CBFO M&RC	

\*ED denotes electronic distribution

### CAR CONTINUATION SHEET

1. CAR No: 18-053	2. Activity No: A-18-04	3. Page 1 of 3
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#### **Block #17 & 18 Acceptance of Corrective Action Completion and Closure:**

The Carlsbad Field Office (CBFO) has reviewed the closure package for Corrective Action Report (CAR) 18-053, including objective evidence and supporting documentation, submitted via US Dept. of Energy, Idaho Cleanup Project letter CCN 323588, dated May 7, 2019, from Mr. John C. McCoy, Director, Waste Management Programs to Mr. James A Malmo, Assistant Manager, Waste Disposition Division, DOE-ID.

Italicized text, taken verbatim from the Corrective Action Plan (CAP), is used to reflect the correlation between the actions required by the CAR and the method used for evaluation.

#### **REMEDIAL ACTIONS**

1. *Develop and provide tailgate training for VEEs to address that CW-216 is not being used and has been replaced with IDCs BN-216, BN-217 and BN-218.*

*Actionee: Steve Carpenter*

*Scheduled Completion Date: 12-18-18*

2. *VEEs provide tailgate training for VE operators to address that CW-216 is not being used and has been replaced with IDCs BN-216, BN-217 and BN-218.*

*Actionee: Matt Hutson/Luke Grover*

*Scheduled Completion Date: 12-18-18*

#### **Verification:**

The objective evidence submitted in this closure package was reviewed and verified to meet the required remedial actions commitment. The evidence included tailgate training "SRP IDC CW-216 REASSIGNMENT" for Visual Examination Experts (VEEs) and VE operators, stating that IDC CW-216 has been replaced with three new IDCs: BN-215, BN-216 and BN-217. The reviewed documentation also included course completion records indicating that all VEEs and VE Operators attended the "SRP IDC CW-216 REASSIGNMENT" course.

#### **INVESTIGATIVE ACTIONS**

*CW-216 was to be revised to assign IDCs to SRP waste outputs that were managed by TRUCON codes by CCP for off-site shipment to WIPP. Fluor does not manage waste by TRUCON codes, waste is managed by IDCs. The output waste was discussed between the VEEs and AKEs to determine the variations in output waste contents. The IDCs were developed to be equivalent to expected TRUCON codes. The IDCs would be presented in a future Waste Stream Profile package for TRUCON code assignments. For previously generated waste that already had a VE as CW-216, the new IDCs listed in RPT-TRUW-05 could be assigned by AKEs through an SDCR.*

*To be proactive, it was recommended that the CW-216 be discontinued and replaced with 3 new IDCs assigned at the time of VE. Revision 40 of RPT-TRUW-05 proposed three IDCs:*

- *BN-216 – Primarily inorganic sludge with any identified RF-003 or RF-743 waste,*

### CAR CONTINUATION SHEET

1. CAR No: 18-053

2. Activity No: A-18-04

3. Page 2 of 3

- *BN-217 – Primarily inorganic sludge with no identified RF-003 or RF-743 waste,*
- *BN-218 – Primarily organic sludge.*

*This issue is limited to the discontinued IDC CW-216 and there is no impact to the acceptability of the data. The containers assigned IDC CW-216 are tracked in WTS and will be re-assigned to an applicable new IDC prior to being presented to a waste stream profile.*

*After further investigation into whether the new proposed IDCs listed in RPT-TRUW-05 Rev 40 were equivalent to TRUCON codes it was determined to revise the IDCs and not to assign these at the time of VE until revision 42 was issued. Revision 42 of RPT-TRUW-05 effective 08/07/18, included the revised IDCs as follows:*

- *BN-215 – Primarily organic homogeneous solids with  $\geq 50\%$  identified RF-003 or RF-743 waste,*
- *BN-216 – Primarily inorganic homogeneous solids with any identified RF-003 or RF-743 waste but  $< 50\%$  by volume,*
- *BN-217 – Primarily inorganic sludge with no identified RF-003 or RF-743 waste.*

*These IDCs were presented to the VEEs by the AKE SME and after understanding and concurrence of the IDCs by the VEEs, it was agreed to initiate assignment of these IDCs presented in Revision 42 during VE.*

#### **Verification:**

Investigative actions were evaluated and found to be acceptable, as documented in CBFO CAP acceptance memorandum CBFO:OQA:MPN:JM:19-0103:UFC 2300.00.

#### **CAUSAL ANALYSIS**

*Not required for this CAR.*

#### **ACTIONS TO PRECLUDE RECURRENCE**

1. *Ensure that RPT-TRUW-05 is included in the VE Operator and VEE qualification job code to notify them when a new revision is issued and to complete the required reading.*

**Actionee: Lisa Frost**  
**Scheduled Completion Date: 12/16/18**

2. *Generate a Qualified Watch List for VE Operators and VEE's to ensure that all personnel are qualified and required reads are complete before being assigned to a task.*

**Actionee: Matt Hutson**  
**Scheduled Completion Date: 12/18/18**

3. *Update the VE procedures (TPR-7997) for the VEE to ensure visual examiners are trained and qualified to perform their responsibilities.*

**Actionee: Matt Hutson**  
**Scheduled Completion Date: 12/18/18**

**CAR CONTINUATION SHEET**

1. CAR No: 18-053	2. Activity No: A-18-04	3. Page 3 of 3
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**Verification:**

The objective evidence submitted in this closure package was reviewed and verified to meet the required actions to preclude recurrence. The objective evidence reviewed included RPT-TRUW-05, *Waste Matrix Code Reference Manual*, on the 'Job Requirements Report' required reading, dated 4-22-19 for VEEs and VE Operators. The evidence also included a Site Training Qualified Watcher List: RWMC VE QWL (as of 01/22/2019) with the current revision of RPT-TRUW-05, *Waste Matrix Code Reference Manual*, Rev. 43. The evidence also included the current revision of Visual Examination Activities at RWMC, TPPER-7997, Rev. 7, Effective Date 05/02/2019, Step 3.10, "VEE: Ensure visual examiners are trained and qualified to perform responsibilities."

**CLOSURE ACCEPTANCE**

Based on the results of the review of the objective evidence included in the CAR 18-053 closure package, it is recommended that CAR 18-053 be closed.

  
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Evaluation Performed By: Randy Fitzgerald, CTAC

5-13-19  
Date