

United States Government

Department of Energy

memorandum

Carlsbad Field Office
Carlsbad, New Mexico 88221

DATE: September 16, 2021

REPLY TO
ATTN OF: CBFO:QAD:JL:JM:21-0921:UFC 2300.00

SUBJECT: Verification and Acceptance of Closure Documentation for CBFO CAR 21-004 from A-20-19 AMWTP Recertification Audit

to: Nicole Badrov, Acting Assistant Manager, Department of Energy - Fluor Idaho

The Carlsbad Field Office (CBFO) has completed its review and verification of documentation demonstrating completion of the corrective actions associated with CBFO Corrective Action Report (CAR) 21-004. The CAR resulted from Audit A-20-19, conducted September 22, 2020 through October 8, 2020. The results of the verification are documented in the attached CAR Continuation Sheet, and indicate that the documentation of completion of corrective actions is acceptable. As a result, CAR 21-004 is considered closed.

If you have any questions concerning this closure, please contact me at (575) 200-0716.

JOE LOPEZ
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LOPEZ
Date: 2021.09.16 10:15:54
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Joe Lopez
Software Quality Assurance Specialist
Office of Quality Assurance
Carlsbad Field Office

Attachment (1)

cc: attachment (1)

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		CBFO QA File	

*ED denotes electronic distribution

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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) 21-004, including objective evidence and supporting documentation, submitted via Department of Energy (DOE) Idaho Operations Office memorandum CLN211599 dated September 14, 2021, from Nicole Badrov, Acting Assistant Manager, Environment and Waste Program, to Joe Lopez, Quality Assurance Specialist, Department of Energy, Carlsbad Field Office.

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. *Revise TPR-7997 Step 4.2.13 to provide instruction for initiating an NCR when the waste doesn't match the waste stream description.*
2. *Revise TPR-8041, Visual Examination Operations, to provide instruction for initiating an NCR when the waste doesn't match the waste stream description.*

Verification:

The objective evidence submitted in this closure package was reviewed and verified to meet the required remedial actions commitment. The evidence included copies of the revised procedures TPR-7997, *Visual Examination Activities at RWMC*, and TPR-8041, *Visual Examination Operations*.

INVESTIGATIVE ACTIONS

1. *Reviewed TPR-7867, "SRP RA Waste Processing," used in preparation for the VE performed under TPR-7997 includes requirements for the AKE or AK Technician to examine the waste to verify it is an approved IDC. When the waste stream can't be verified or is unexpected then FRM-2787, "Sludge Repackage Project Unexpected Waste Disposition Form," is filled out to segregate the waste and evaluate to determine the path forward. For ARP exhumed waste, Retrieval Specialists (RS) will decide if the waste is targeted waste or non-targeted waste using TPR-7420, "ARP Waste Retrieval" and GDE-318, "SDA Targeted and Non--Targeted Waste Identification Operator Guide." If the waste is targeted, it will be sent to the DPS for Visual Examination. If the waste is non-targeted, it will be sent back to the pit it came out of. This ensures that any waste Visually Examined matches the waste stream description for exhumed ARP waste.*
2. *In addition, "TPR-8040, Boxline Operation," used in preparation for the VE includes steps for the Acceptable Knowledge Expert (AKE) or AK Technician to examine the waste to verify it is an approved IDC. Regarding S3000 waste, when the waste stream can't be verified or is unexpected then an FRM-2787, "Sludge Repackage Project Unexpected Waste Disposition Form," is filled out to segregate the waste and evaluate to determine the path forward.*
3. *Reviewed the Visual Examination Operator (VEO) Qualification cards QPVE0001 and QPVE0002. The VEO's that perform VE in accordance with TPR-7997 and TPR-8041 are trained to understand the Data Quality Objectives (DQO's) for VE. The DQO for VE in*

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accordance with PLN-5199 is to verify the physical form of the waste matches the waste stream description as determined by AK.

4. *TPR-7997 section 4.2.10 states "Ensure the waste is manipulated and examined to the extent that data quality objectives (DQOs) can be satisfied. Further 4.2.13 describes that if waste is presented during VE that does not meet WIPP Waste Acceptance Criteria, then VE will stop, the VEE/Operations Supervision will be notified and when WIPP waste acceptance criteria have been satisfied, then proceed with waste examination.*
5. *TPR-8041 section 4.2.16 has similar steps as TPR-7997 4.2.13 describing the actions that must be taken if the waste does not meet WIPP waste acceptance criteria. Further when the Site Project Manager completes the Characterization Information Summary in accordance with WIP-4 "Data Reconciliation" and verifies the VE DQO's have been met.*

The investigative actions concluded that while TPR-7997 and TPR-8041 do not currently give instruction to initiate and NCR when the waste does not match the waste stream description; however, there are multiple processes, trainings, stops in both procedures and independent review by the SPM to ensure that a waste container that is characterized by VE and found to not match the waste stream description, will not be certified and shipped to WIPP. These multiple defense-in-depths ensure that the WIPP waste acceptance criteria is met for a container that does not meet the waste stream description.

Verification:

The investigative actions were evaluated and found to be acceptable, as documented in CBFO CAP acceptance memorandum CBFO:OQA:JL:JM:20-0924:UFC 2300.00.

CAUSAL ANALYSIS

Event/Issue:

There are no procedural steps in procedures TPR-7997, Rev. 7, or TPR-8041, Rev. 8, to initiate an NCR when the VE Operator identifies, (1) that the waste form does not match the waste stream description, and (2) the waste does not match the waste stream description.

Analysis/Scope:

Visual examination processes for waste that has the potential for certification to ship to WIPP.

Event Reconstruction:

From the early 2000's, processing activities were managed using TPR-8040, "Boxline Operations", and TPR-7867, "SRP RA Waste Processing" which controls the waste streams/IDCs allowed for processing using TPR-7997, "Visual Examination Activities at RWMC" and TPR-8041, "Visual Examination Operations."

Analysis:

TPR-7867, "SRP RA Waste Processing", used in preparation for the VE performed under TPR-7997, "Visual Examination Activities at RWMC," includes requirements for the Acceptable Knowledge Expert (AKE) or AK Technician to examine the waste to verify it is an approved IDC. When the waste stream can't be verified or is unexpected that FRM-2787, "Sludge Repackage Project Unexpected Waste

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Disposition Form,” is filled out to segregate the waste and evaluate to determine the path forward. For ARP exhumed waste, Retrieval Specialists (RS) determine if the waste is targeted waste or non-targeted waste using TPR-7420, “ARP Waste Retrieval” and GDE-318, “SDA Targeted and Non—Targeted Waste Identification Operator Guide.” If it is targeted, it will be sent to the Drum Packaging Station (DPS) for Visual Examination. If it is non-targeted, it will be sent back to the pit it came out of. This ensures that any waste Visually Examined matches the waste stream description for exhumed ARP waste. TPR-8040, used in preparation for the VE includes steps for the AKE or AK Technician to examine the waste to verify it is an approved IDC. Regarding S3000 waste, when the waste stream can’t be verified or is unexpected then FRM-2787, “Sludge Repackage Project Unexpected Waste Disposition Form,” is filled out to segregate the waste and evaluate to determine the path forward.

VEOs that perform VE in accordance with TPR-7997 and TPR-8041 are trained to understand the Data Quality Objectives (DQOs) for VE. The DQO for VE in accordance with PLN-5199 is to verify the physical form of the waste matches the waste stream description as determined by AK. Further when the Site Project Manager completes the Characterization Information Summary in accordance with WIP-4, Data Reconciliation and verifies the VE DQO’s have been met.

Conclusions:

Although processing controls are in place to ensure management of waste streams/IDCs prior to the use of TPR-7997 and TPR-8041, TPR-7997 and TPR-8041 do not provide explicit direction for initiating an NCR when the VE Operator identifies, (1) that the waste form does not match the waste stream description, and (2) the waste does not match the waste stream description.

Cause Code: *A5 Communications LTA/B2 Written Communication Content LTA/C08 Incomplete, Situation Not Covered*

Recommendations:

To ensure consistency with procedural instructions, it is recommended that TPR-7997 and TPR-8041 be revised to provide direction for initiation of NCRs when/if VE Operator identifies, (1) that the waste form does not match the waste stream description, and (2) the waste does not match the waste stream description.

Verification:

The causal analysis was evaluated and found to be acceptable, as documented in CBFO CAP acceptance memorandum CBFO:OQA:JL:JM:20-0924:UFC 2300.00.

ACTIONS TO PRECLUDE RECURRENCE

1. *Complete training with the qualified VE operators on the changes to the VE procedure for initiating NCRs.*

COMMITMENTS

Complete training with the qualified VE operators on the changes to the VE procedure for initiating NCRs.

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Revise TPR-7997 to provide instruction for initiating an NCR when the waste doesn't match the waste stream description.

Revise TPR-8041, to provide instruction for initiating an NCR when the waste doesn't match the waste stream description.

Verification:

Verified actions to preclude recurrence are acceptable through review of supporting documentation submitted in the CAR 21-004 closure package. The reviewed documentation included revised procedures TPR-7997, *Visual Examination Activities at RWMC*; TPR-8089, *Real-Time Radiography Examinations (Certification Scans)*; and TPR 8041, *Visual Examination Operations*. A revision to procedure WIP-2, *Level I Data Validation*, was also included, with additional procedural changes made to address the issue identified in this CAR in other disciplines mentioned within the procedure. The training documentation provided included tailgate training rosters for the revised procedures mentioned above for Visual Examination and Real-time Radiography personnel.

CLOSURE ACCEPTANCE

The results of the evaluation of the CAR 21-004 closure package indicate that the remedial actions, investigative actions, causal analysis, and proposed corrective actions satisfactorily address the condition adverse to quality documented in CAR 21-004, and provide adequate measures for precluding recurrence. Therefore, based on the results of the review of the objective evidence included in the CAR 21-004 closure package, it is recommended that CAR 21-004 be closed.

DUSTIN STEGMAN
(Affiliate)

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Date: 2021.09.15 14:27:20 -06'00'

Evaluation Performed By: Dustin Stegman

Date