

United States Government

Department of Energy

memorandum

 Carlsbad Area Office
 Carlsbad, New Mexico 88221


DATE: June 4, 1999

REPLY TO
ATTN OF: CAO:QA:MAI:99-0846:UFC 2300.00

SUBJECT: Issuance of Corrective Action Reports (CARs) 99-047, 99-048, and 99-049 from CAO Audit A-99-15

TO: Tom Baillieul, CEMP

On May 6-7, 1999, the Carlsbad Area Office (CAO) performed Audit A-99-15 of Battelle Columbus Laboratories Decommissioning Project (BCLDP) TRU waste characterization activities related to Acceptable Knowledge. The audit team identified two (2) conditions adverse to quality and one significant condition adverse to quality, which have been identified on Corrective Action Reports (CARs) 99-047, 99-048, and 99-049.

CAR 99-047 will require a formal response back to the CAO by July 5, 1999. Also for CARs 99-048 and 99-049, please advise me prior to the response due date identified in CAR block 14, of the expected date for completion of corrective actions. Also, please formally notify the Audit Team Leader as soon as the corrective actions are complete and ready to be verified.

If you have any questions or comments, please contact Samuel Vega at (505) 234-7423.

Samuel Vega FBA
 Marc A. Italiano
 Quality Assurance Manager

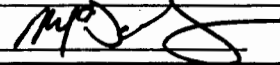
Attachment

cc w/attachment:
 L. Chism, CAO
 B. Bennington, CAO
 S. Vega, CAO
 B. Stroud, CAO
 M. Eagle, EPA
 S. Monroe, EPA
 S. Zappe, NMED
 B. Walker, EEG
 D. Winters, DNFSB
 J. Eide, BCLDP
 N. Frank, CTAC

990604



CORRECTIVE ACTION REPORT

1. CAR No.: 99-047	2. Activity Report No.: A-99-15	3. Page <u>1</u> of <u>2</u>
4. Controlling Document: ① CAO 94-1012, Revision 2, <i>Quality Assurance Program Document (QAPD)</i> ② CAO 94-1010 Interim Change; <i>Transuranic Waste Characterization Quality Assurance Program Plan</i>	5. CAO Assessment Team Leader: Marc Italiano	
6. Responsible Organization: Battelle Columbus Laboratories Decommissioning Project (BCLDP)	7. CAQ Was Discussed With: James Eide; Manager, Waste Management Operations	
8. Requirement that was violated: ① Section 1.1.2.1. Requires that [BCLDP] develop and implement procedures that effectively describe the CAO QAPD and CAO QAPP requirements. ② Para. 4.3.2. [page 11] states in part: "At a minimum, the waste process information must include: Process flow diagrams."		
9. Condition Adverse to Quality: See continuation sheet (s)		
10. Suggested Actions (Optional):		
11. Significant Condition Adverse to Quality (Yes or No)? NO YES SU 6/3/99		
12. Types of Actions: Remedial: <input checked="" type="checkbox"/> Investigative: <input checked="" type="checkbox"/> Root Cause: <input checked="" type="checkbox"/> Actions to Preclude Recurrence: <input checked="" type="checkbox"/> SU 6/3/99		
13. CAR Initiator: <u>Mark Doherty</u>  Date: <u>6/5/99</u>		
14. Response Due Date: <u>07/5/99</u> Corrective Action Plan Required: NO		
15. Trend Cause Code: _____		
16. Concurrence: <u>Samuel Uja For M. ITALIANO</u> <u>6/3/99</u> Assessment Team Leader Date		
17. Corrective Actions Proposed by the Responsible Organization (for SCQA only): Use CAR Continuation Sheet		
18. Acceptance of Proposed Corrective Actions (for SCAQ only):		
_____	_____	_____
Assessment Team Leader	Date	Quality Assurance Manager
19. Verification of Corrective Action Completion:		
20. Verified By: _____		
Name	Date	
21. Closure: _____		
Assessment Team Leader	Date	

CAO CORRECTIVE ACTION REPORT

(continuation sheet)

1. CAR No.: 99-047

2. Activity No.: A - 99 - 15

3. Page 2 of 2

Block # 9: ① The following documents were identified as being inadequate during the CAO audit A 99-15 and did not properly provide a top-down implementation of all the CAO QAPD, CAO QAPP, and BCLDP QAPJP requirements:

SOP TC-AP-03.1:

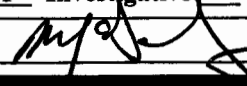
1. This SOP doesn't address how to write the summaries (the AK documents like TCP-98-03 and the process descriptions).
2. Training requirements need to be specified. (QAPP 4.4.1)
3. Bullets 6, 7, 8, 9, 10, and 13 of QAPP 4.2.1, procedure elements, need to be addressed.
4. Needs to address items 3 through 9 of the QAPP Section 4.2.1.
5. This SOP needs to identify how it will be used to characterize newly generated waste. (See the end of QAPP 4.2.1)
6. This SOP needs to direct confirmatory sampling.
7. The SPM assigns EPA hazardous waste numbers, the AK experts can only recommend. Revise 4.4.5 to correct this.
8. Section 5.2.5 needs to include the justification for use of the references.
9. Section 5.3 needs to address identification of waste material parameters and radionuclides.
10. Section 5.4 needs to include the materials and processes, HGAS sampling and analysis, RTR or VE, and solids analysis (if applicable).
11. Section 5.4.2 needs to specify that containers with discrepancies will not be shipped or shipping that waste stream will cease.
12. Section 5.5, re-evaluation of AK needs to include the reassessment of all sampling and analytical data and verification of characterization reassignments.
13. Pg. 13, Exhibit 2. Item 2 needs to include maps.
14. Pg. 13, Exhibit 2. Item 6 needs to include quantities.
15. Pg. 13, Exhibit 2. Item 12 needs to include certification procedures for WIPP disposal.
16. Pg. 14, Exhibit 2. Item 1 needs to include the volume and time period of generation.

Acceptable Knowledge Document TCP-98-03:

1. This document is missing the waste stream correlation to the mandatory information (QAPP 4.3.2); rate and quantity of newly generate waste; and a description of its relationship to the Process Description documents.
2. The introduction should identify the waste streams.
3. Section 3.2.1. Does not define "cermet".
4. Figure 3-3. Several arrows are missing from the diagram.
5. Section 3.2.2.1. Describe the contents of radiacwash, Spray Nine, and "other soaps." Include this information in a process description.
6. A "Process Description" should be prepared for each of the cells.
7. Section 3.2.2.5. Define "Lampson Tubes."
8. Page 17. Define "gonimeter."
9. Section 3.2.2.6, second paragraph. Define what is meant by "current manipulators"
10. Page 18, third paragraph, end include plutonium production fuel, and Navy fuel.
11. Page 18, fourth paragraph. Define how the sampling and analysis results compare with ORIGEN.
12. Section 4.1. If these are individual waste streams, define them and define "sweeper bags."
13. Page 52, C010. "Extremely limited information on where research was performed" is very inflammatory. Delete "extremely."

② Contrary to QAPP 4.3.2, the AK Summary Document, TCP-98-03, Figure 3-3 did not define the process inputs and work outputs.

CORRECTIVE ACTION REPORT

1. CAR No.: 99-048	2. Activity Report No.: A - 99 - 15	3. Page <u>1</u> of <u>1</u>								
4. Controlling Document: CAO-94-1010: Transuranic Waste Characterization Quality Assurance Program Plan: Interim Change	5. CAO Assessment Team Leader: Marc Italiano									
6. Responsible Organization : Battelle Columbus Laboratories Decommissioning Project (BCLDP)	7. CAQ Was Discussed With: James Eide; Project Manager (BCLDP)									
8. Requirement that was violated: Section DEFINITIONS page 8 states in part: "WASTE STREAM - Waste material generated from a single process or activity that is similar in material, physical form, and hazardous constituents."										
9. Condition Adverse to Quality: BCLDP has not defined "Waste Stream" in its program.										
10. Suggested Actions (Optional):										
11. Significant Condition Adverse to Quality (Yes or No)?: NO										
12. Types of Actions: Remedial: <u>X</u> Investigative: <u> </u> Root Cause: <u> </u> Actions to Preclude Recurrence: <u> </u>										
13. CAR Initiator: <u>Mark Doherty</u>  Date: <u>June 5, 1999</u>										
14. Response Due Date: <u>July 15, 1999</u> Corrective Action Plan Required: NO										
15. Trend Cause Code: <u> </u>										
16. Concurrence: <u>Samuel Vega</u> <u>FOR M. ITALIANO</u> <u>6/3/99</u> Assessment Team Leader Date										
17. Corrective Actions Proposed by the Responsible Organization (for SCQA only): Use CAR Continuation Sheet										
18. Acceptance of Proposed Corrective Actions (for SCAQ only): <table border="0" style="width: 100%;"><tr><td>_____</td><td>_____</td><td>_____</td><td>_____</td></tr><tr><td style="text-align: center;">Assessment Team Leader</td><td style="text-align: center;">Date</td><td style="text-align: center;">Quality Assurance Manager</td><td style="text-align: center;">Date</td></tr></table>			_____	_____	_____	_____	Assessment Team Leader	Date	Quality Assurance Manager	Date
_____	_____	_____	_____							
Assessment Team Leader	Date	Quality Assurance Manager	Date							
19. Verification of Corrective Action Completion:										
20. Verified By: _____ Name Date										
21. Closure: _____ Assessment Team Leader Date										

