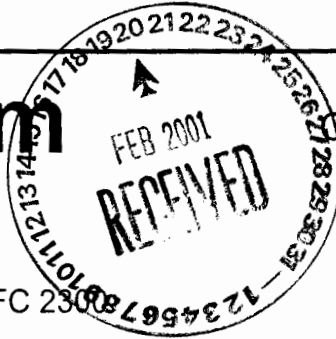


United States Government

Department of Energy

memorandum

Carlsbad Field Office
Carlsbad, New Mexico 88221



DATE: February 13, 2001
 REPLY TO
 ATTN OF: CBFO:QA:SAV:VW:01-0632:UFC 2300
 SUBJECT: Issuance of Corrective Action Reports (CARs) 01-014 through 01-020

TO: Joseph A. Legare, Assistant Manager for Environment and Compliance, RFFO

The Carlsbad Field Office (CBFO) performed Audit A-01-07 of the Rocky Flats Environmental Technology Site (RFETS) on January 29 – February 1, 2001. The audit team identified nine (9) conditions adverse to quality, which have been documented in CARs 01-014 through 01-020.

Please document on the attached CAR Continuation Sheets your proposed corrective actions and a schedule for completion and forward to me prior to the response due date identified in CAR Block 14.

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

Lea Chism
 for Samuel A. Vega
 Quality Assurance Manager

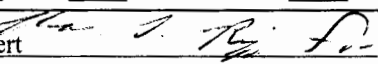
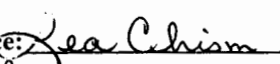
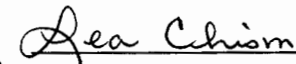
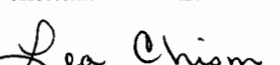
Attachments

- cc: w/attachments
- K. Watson, CBFO
- L. Chism, CBFO
- J. Jefferies, RFFO
- C. Ferrera, RFETS
- J. O'Leary, RFETS
- R. A. Eschenbaum, RFETS
- M. Eagle, EPA
- S. Monroe, EPA
- S. Zappe, NMED
- B. Walker, EEG
- D. Winters, DNFSB
- M. Gerle, WID
- J. Schutz, CTAC

010233



CORRECTIVE ACTION REPORT

1. CAR No.: 01-014	2. Activity Report No.: A-01-07	3. Page <u>1</u> of <u> </u>
4. Controlling Document: QAPD 1.3.2.3A, WAP B3-13	5. CBFO Assessment Team Leader: Sam Vega	
6. Responsible Organization: : RFETS, AK	7. CAQ Was Discussed With: Roger Ballenger, Vivian Sendelweck	
8. Requirement that was violated: QAPD 1.3.2.3A and WAP B3-13 require that "Nonconforming items shall be identified...."		
9. Condition Adverse to Quality: Nonconforming items have not been formally identified nor have corrective action plans been initiated for the issues. IDC was changed and HWNs dropped (contrary to RFETS procedure requirements) without performance of a reassessment of the information.		
10. Suggested Actions (Optional):		
11a. Significant CAQ	(Yes or No): NO	
11b. Work Suspension Recommended	(Yes or No): NO	
11c. CCA-Related	(Yes or No): NO	
11d. RCRA-Related	(Yes or No): YES	
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"/>		
13. CAR Initiator: <u>Dick Blauvelt, Steve Calvert</u> 		Date: <u>February 1, 2001</u>
14. Response Due Date: <u>March 9, 2001</u>	Corrective Action Plan Required: YES	
15. Concurrence: <u>Lea Chism</u>  for Assessment Team Leader	<u>2-13-01</u> Date	<u>Lea Chism</u>  for Responsible Assistant Manager
	<u>2-13-01</u> Date	<u>2-13-01</u> Date
	<u>Lea Chism</u>  for Quality Assurance Manager	
16. Corrective Actions Proposed by the Responsible Organization: Use CAR Continuation Sheet		
17. Acceptance of Proposed Corrective Actions:		
_____	_____	
Assessment Team Leader	Date	
18. Verification of Corrective Action Completion: (Use CAR Continuation Sheet)		
19a. Verified By: _____		
19b. Trend Cause Code: _____		
20. Closure: _____		
	Quality Assurance Manager	Date

CBFO CORRECTIVE ACTION REPORT

(continuation sheet)

1. CAR No.:	2. Activity No.:	3. Page ___ of ___
<p>Block # _____</p>		

CORRECTIVE ACTION REPORT

1. CAR No.: 01-015	2. Activity Report No.: A-01-07	3. Page <u>1</u> of <u> </u>
4. Controlling Document: Waste Acceptance Criteria for the Waste Isolation Pilot Plant, DOE/WIPP-069	5. CBFO Assessment Team Leader: Sam Vega	
6. Responsible Organization: : Canberra/RFETS	7. CAQ Was Discussed With: John Fleissner, Craig Davidson, David Dahl	
8. Requirement that was violated: The WAC requires that procedures be written, that QAO's and PDP's be appropriate for the assay procedure.		
9. Condition Adverse to Quality: Canberra reduced the count time on the PN counter from 1800 to 1020 seconds for drums with tag values greater than 1.5g total Pu, without specifying the change in their operating procedures.		
10. Suggested Actions (Optional) During the next PDP Cycle use the 1020 seconds count time.		
11a. Significant CAQ	(Yes or No): YES	
11b. Work Suspension Recommended	(Yes or No): NO	
11c. CCA-Related	(Yes or No): NO	
11d. RCRA-Related	(Yes or No): NO	
12. Types of Actions: Remedial: <u>X</u> Investigative: <u>X</u> Root Cause: <u>X</u> Actions to Preclude Recurrence: <u>X</u>		
13. CAR Initiator: <u>Ken Coop/Pete Rodriguez</u> Date: <u>02/01/01</u>		
14. Response Due Date: <u>March 9, 2001</u> Corrective Action Plan Required: YES		
15. Concurrence: <u>Lea Chism</u> for Assessment Team Leader	<u>2-13-01</u> Date	<u>Lea Chism</u> for Responsible Assistant Manager
	<u>2-13-01</u> Date	<u>2-13-01</u> Date
16. Corrective Actions Proposed by the Responsible Organization: Use CAR Continuation Sheet		
17. Acceptance of Proposed Corrective Actions:		
_____	_____	_____
Assessment Team Leader	Date	
18. Verification of Corrective Action Completion: (Use CAR Continuation Sheet)		
19a. Verified By: _____		
19b. Trend Cause Code: _____		
20. Closure: _____		
Quality Assurance Manager	Date	

CBFO CORRECTIVE ACTION REPORT

(continuation sheet)

1. CAR No.:	2. Activity No.:	3. Page ___ of ___
<p>Block # _____</p>		

CORRECTIVE ACTION REPORT

1. CAR No.: 01-016	2. Activity Report No.: A-01-07	3. Page <u>1</u> of <u> </u>
4. Controlling Document: 95-QAPjP-050		5. CBFO Assessment Team Leader: Sam Vega
6. Responsible Organization: : RFETS		7. CAQ Was Discussed With: Frank Grady
8. Requirement that was violated: Section B3-10a(1) of 95-QAPjP-050 requires that the independent technical review must be performed by an individual other than the data generator.		
9. Condition Adverse to Quality: In visual examination (VE) batch report VE-2000-007, the visual examination expert (VEE) who generated the VE data and signed the VE data forms also performed the independent technical review for the batch.		
10. Suggested Actions (Optional):		
11a. Significant CAQ (Yes or No): No		
11b. Work Suspension Recommended (Yes or No): No		
11c. CCA-Related (Yes or No): No		
11d. RCRA-Related (Yes or No): Yes		
12. Types of Actions: Remedial: <u>X</u> Investigative: <u>X</u> Root Cause: <u>X</u> Actions to Preclude Recurrence: <u>X</u>		
13. CAR Initiator: <u>W. Ledford</u>		Date: <u>2/1/2001</u>
14. Response Due Date: <u>March 9, 2001</u>		Corrective Action Plan Required: <u>YES</u>
15. Concurrence: <u>Lea Chism</u> <u>2-13-01</u>		<u>Lea Chism</u> <u>2-13-01</u>
for Assessment Team Leader Date		for Responsible Assistant Manager Date
<u>Lea Chism</u> <u>2-13-01</u>		
for Quality Assurance Manager Date		
16. Corrective Actions Proposed by the Responsible Organization: Use CAR Continuation Sheet		
17. Acceptance of Proposed Corrective Actions:		
_____		_____
Assessment Team Leader		Date
18. Verification of Corrective Action Completion: (Use CAR Continuation Sheet)		
19a. Verified By: _____		
19b. Trend Cause Code: _____		
20. Closure: _____		
Quality Assurance Manager		Date

CDFO CORRECTIVE ACTION REPORT

(continuation sheet)

1. CAR No.:	2. Activity No.:	3. Page ____ of ____
<p>Block # _____</p>		

CORRECTIVE ACTION REPORT

1. CAR No.: 01-017	2. Activity Report No.: A-01-07	3. Page <u>1</u> of <u> </u>
4. Controlling Document: QAPD and 1-MAN-008-WM-001	5. CBFO Assessment Team Leader: Sam Vega	
6. Responsible Organization: : RFETS/KH-QA	7. CAQ Was Discussed With: Dewitt Beeler	
8. Requirement that was violated: CBFO QAPD, #CAO-94-1012, Rev 3 paragraphs 1.1.1.3.B, 1.1.1.4.B1 and 1.1.1.4.B2 (NQA-1, Supplement 1S-1, Paragraphs 3.2.1 and 3.2.2) Organization, Communication and Interface Responsibilities.		
9. Condition Adverse to Quality: The Procurement QA personnel report to the Procurement Manager, this does not provide the organizational freedom provided by QAPD Section 1.1.1.3.B The Transuranic Waste Management Manual, 1-MAN-008-WM-001 does not clearly establish and document the de-centralized quality assurance (QA) organizations. QA groups reside in the K-H Procurement Systems, Building 371/374 Closure Project, Building 707 Closure Project, Building 771 Closure Project, and Building 776 Closure Project. (See continuation sheet)		
10. Suggested Actions (Optional):		
11a. Significant CAQ (Yes or No): YES		
11b. Work Suspension Recommended (Yes or No): NO		
11c. CCA-Related (Yes or No): NO		
11d. RCRA-Related (Yes or No): NO		
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"/>		
13. CAR Initiator: <u>Charlie Riggs, Earl Bradford</u>		Date: <u>February 1, 2001</u>
14. Response Due Date: <u>March 9, 2001</u>		Corrective Action Plan Required: YES
15. Concurrence: <u>Lea Chism</u> for Assessment Team Leader	<u>2-13-01</u> Date	<u>Lea Chism</u> for Responsible Assistant Manager
	<u>2-13-01</u> Date	<u>2-13-01</u> Date
16. Corrective Actions Proposed by the Responsible Organization: Use CAR Continuation Sheet		
17. Acceptance of Proposed Corrective Actions:		
_____	_____	
Assessment Team Leader	Date	
18. Verification of Corrective Action Completion: (Use CAR Continuation Sheet)		
19a. Verified By: _____		
19b. Trend Cause Code: _____		
20. Closure: _____		
	Quality Assurance Manager	Date

CBFO CORRECTIVE ACTION REPORT

(continuation sheet)

1. CAR No.: 01-017

2. Activity No.: A-01-07

3. Page 2 of

Block # 9 Continued

Also, the organizational relationship is not clear between these decentralized QA organizations, the Material Stewardship quality assurance organization, and the centralized, site-wide Kaiser Hill quality assurance organization. Further, the interfaces between all of the decentralized organizations, as well as upward to the Material Stewardship and Kaiser Hill quality assurance organizations, are not clearly defined and documented.

CAR CORRECTIVE ACTION REPORT

(continuation sheet)

1. CAR No.:	2. Activity No.:	3. Page ___ of ___
<p>Block # _____</p>		

C O CORRECTIVE ACTION REPORT

(continuation sheet)

1. CAR No.:	2. Activity No.:	3. Page ___ of ___
<p>Block # _____</p>		

CORRECTIVE ACTION REPORT

1. CAR No.: 01-019	2. Activity Report No.: A-01-07	3. Page <u>1</u> of <u> </u>
4. Controlling Document: 4-H80-776-ASRF-007	5. CBFO Assessment Team Leader: Sam Vega	
6. Responsible Organization: : RFETS, VE	7. CAQ Was Discussed With: Frank Grady	
8. Requirement that was violated: Appendix 3 of 4-H80-776-ASRF-007 requires that the visual exam expert (VEE) determine whether there are PCBs evident in the waste undergoing visual examination.		
9. Condition Adverse to Quality: During the visual examination (VE) of drum D72774, a fluorescent light fixture with a clearly visible ballast was found in the contents of the drum. The VE personnel did not note that the light ballast could indicate the presence of PCBs.		
10. Suggested Actions (Optional):		
11a. Significant CAQ	(Yes or No): Yes	
11b. Work Suspension Recommended	(Yes or No): No	
11c. CCA-Related	(Yes or No): No	
11d. RCRA-Related	(Yes or No): Yes	
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"/>		
13. CAR Initiator: <u>W. Ledford</u> <i>W. Ledford</i> Date: <u>2/1/2001</u>		
14. Response Due Date: <u>March 9, 2001</u> Corrective Action Plan Required: <u>YES</u>		
15. Concurrence: <i>Lea Chism</i> for Assessment Team Leader	<u>2-13-01</u> Date	<i>Lea Chism</i> for Responsible Assistant Manager
<i>Lea Chism</i> Quality Assurance Manager	<u>2-13-01</u> Date	<u>2-13-01</u> Date
16. Corrective Actions Proposed by the Responsible Organization: <u>Use CAR Continuation Sheet</u>		
17. Acceptance of Proposed Corrective Actions:		
_____	_____	_____
Assessment Team Leader	Date	
18. Verification of Corrective Action Completion: (Use CAR Continuation Sheet)		
19a. Verified By: _____		
19b. Trend Cause Code: _____		
20. Closure: _____		
Quality Assurance Manager	Date	

CASE CORRECTIVE ACTION REPORT

(continuation sheet)

1. CAR No.:

2. Activity No.:

3. Page ___ of ___

Block # _____

CCAO CORRECTIVE ACTION REPORT

(continuation sheet)

1. CAR No.: 01-020	2. Activity No.: A-01-07	3. Page <u>2</u> of <u> </u>
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Block # 8

- 40 CFR 191 requires an assessment be made for a repository. Appendix C to 191 says this will be used to show compliance with 191.13 (containment).
- 40 CFR 194 describes how WIPP will show compliance with 191.
- 194.24 requires the radiological waste components (radionuclides in this case) be described. The description will include the quantity of the component and "may be derived from process knowledge, current non-destructive examination/assay, or other information and methods.
- 194.24 (c)(3) requires demonstration that use of process knowledge to quantify components in waste for disposal conforms with QA requirements found in 194.22.
- 194.24 (c)(4) requires ongoing controls to assure the limitations are not exceeded (need to track radionuclide mix to show the PA was correct).
- 194.22 (a)(2) requires a QA program be established for waste characterization and assumptions.
- 194.22 (a)(2) requires the CCA to discuss how QA will be used to assess the quality characteristics for data (QAOs).
- Chapter 4 of the CCA allows AK for waste characterization (4.1.1).
- Chapter 4, 4.1.3.3 describes how the CCA radionuclide inventory was estimated but will be determined quantitatively prior to shipment to confirm the estimate.
- Chapter 4, 4.3.4 specifies that the QA program as provided in the QAPP and methods manual (MM not relevant for radionuclides) will be used for characterization. It states that the QAOs for NDA are in the QAPP. This is how 194.22 will be met.
- Chapter 4, 4.4 restates that characterization will be performed in accordance with the QAPP and WAC.
- Chapter 4, 4.4.2 allows a combination of assay methods, including AK, can be used as long as the QAOs in the QAPP are met.
- Chapter 5 of the CCA (QA) states that the QAPP will be used to meet QA requirements.
- WAC and WCL of the CCA describe why some components are significant and must be tracked and why some can be dismissed. It explains why there are 10 significant radionuclides. These sections do not discuss making measurements.
- The requirements for NDA were in Chapter 9 of the QAPP. This material was moved to Appendix A of the WAC.
- Section 1.0 of the WAC states that the WAP will provide details for characterization programs. Attachment A, A.1 states that the isotopic ratios used to quantify all radionuclides present in the waste can be made using AK. It also states that AK will meet the WAP requirements.
- B4-1 and B4-3d of the WAP states that AK must be confirmed using sampling and analysis.

The ASTM methods that are the basis for assay describe how to quantify radionuclides in a container by using isotopic ratios for the radionuclides present in the waste. For use at WIPP, knowledge of these ratios can be provided by AK, but AK must be confirmed. Therefore, a site that uses isotopic ratios derived from AK must confirm that ratio by a measurement program.

CBFO CORRECTIVE ACTION REPORT

(continuation sheet)

1. CAR No.:	2. Activity No.:	3. Page ___ of ___
<p>Block # _____</p>		