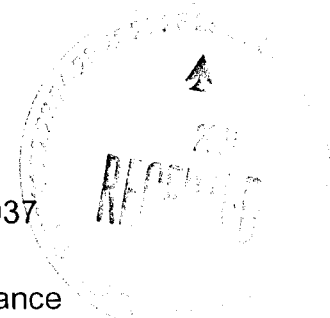


United States Government

Department of Energy

memorandum

Carlsbad Field Office
Carlsbad, New Mexico 88221

DATE: May 24, 2001

REPLY TO
ATTN OF: CBFO:QA:SAV:VW:01-1127:UFC:2300

SUBJECT: Issuance of Corrective Action Reports (CARs) 01-034 through 01-037

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

The Carlsbad Area Office (CAO) performed Audit A-01-12 of the Rocky Flats Environmental Technology Site (RFETS) on May 14-18, 2001. The audit team identified seven (7) conditions adverse to quality, which have been documented in CARs 01-034 through 01-037.

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.


Samuel A. Vega
Quality Assurance Manager

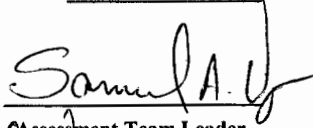
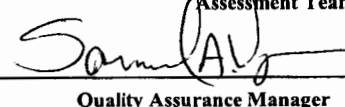
Attachments

cc w/attachments:
K. Watson, CBFO
L. Chism, CBFO
J. Jefferies, RFFO
C. Ferrera, RFETS
G. O'Leary, RFETS
R. A. Eschenbaum, RFETS
T. Harms, DOE HQ
M. Eagle, EPA
S. Monroe, EPA
S. Zappe, NMED
B. Walker, EEG
D. Winters, DNFSB
M. Gerle, WTS Operating Record
J. Schuetz, CTAC

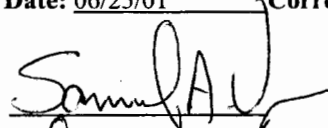
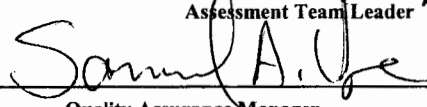
010536



CORRECTIVE ACTION REPORT

1. CAR No.: 01-034	2. Activity Report No.: A-01-12	3. Page <u>1</u> of <u> </u>
4. Controlling Document: Waste Acceptance Criteria for the Waste Isolation Pilot Plant, Rev. 7, DOE/WIPP-069, Section 3.3.1 (CCA Appendix WCL)	5. CBFO Assessment Team Leader: Sam Vega	
6. Responsible Organization: RFETS	7. CAQ Was Discussed With: Johnna Franco, Pete Carson, Howard Menlove	
8. Requirement that was violated: For CH-TRU waste, the waste generators must quantify and report each of the following radionuclides for the purposes of tracking the inventory curie content: ^{241}Am , ^{238}Pu , ^{239}Pu , ^{240}Pu , ^{242}Pu , ^{233}U , ^{234}U , ^{238}U , ^{90}Sr , and ^{137}Cs .		
9. Condition Adverse to Quality: RFETS has not been quantifying ^{234}U .		
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): Yes 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>Ken Coop/Perf Martinez</u> <i>Ken Coop</i> <i>Perf Martinez</i> Date: <u>05/21/01</u>		
14. Response Due Date: <u>06/25/01</u> Corrective Action Plan Required: YES		
15. Concurrence: <div style="display: flex; justify-content: space-between; align-items: flex-start;"> <div style="text-align: center;">  _____ Assessment Team Leader </div> <div style="text-align: center;"> <u>5/24/01</u> Date </div> <div style="text-align: center;"> <u>N/A</u> Responsible Assistant Manager </div> <div style="text-align: center;"> _____ Date </div> </div> <div style="display: flex; justify-content: space-between; align-items: flex-start; margin-top: 10px;"> <div style="text-align: center;">  _____ Quality Assurance Manager </div> <div style="text-align: center;"> <u>5/24/01</u> Date </div> </div>		
16. Corrective Actions Proposed by the Responsible Organization: Use CAR Continuation Sheet		
17. Acceptance of Proposed Corrective Actions:		
<div style="display: flex; justify-content: space-between;"> <div style="width: 30%;"> _____ Assessment Team Leader </div> <div style="width: 30%;"> _____ Date </div> </div>		
18. Verification of Corrective Action Completion: (Use CAR Continuation Sheet)		
19a. Verified By: _____ Date: _____		
19b. Trend Cause Code: _____		
20. Closure: _____ Date: _____		
<div style="display: flex; justify-content: space-between;"> <div style="width: 30%;"> _____ Quality Assurance Manager </div> <div style="width: 30%;"> _____ Date </div> </div>		

CORRECTIVE ACTION REPORT

1. CAR No.: 01-035	2. Activity Report No.: A-01-12	3. Page <u>1</u> of <u> </u>
4. Controlling Document: Waste Acceptance Criteria for the Waste Isolation Pilot Plant, Rev. 7, DOE/WIPP-069, Appendix A, Section A.4	5. CBFO Assessment Team Leader: Sam Vega	
6. Responsible Organization: RFETS	7. CAQ Was Discussed With: Johnna Franco, Pete Carson, Howard Menlove	
8. Requirement that was violated: Any radioassay method may be used to assay TRU waste, provided that it is demonstrated that the assay method meets the requirements of the applicable QAO's and the TRUPACT-II SARP, Appendix 1.3.7, Section 3.0		
9. Condition Adverse to Quality: <ul style="list-style-type: none"> ● No performance demonstration for the Super High Efficiency Neutron Coincidence (SuperHENC) Counter Mobile Assay System has been performed. ● The Performance Demonstration Program (PDP) results have not been received for the Building 569 Tomographic Gamma Scanner. 		
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): Yes	
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>Ken Coop/Port Martinez</u> <i>Ken J. R. P.</i> Date: <u>05/21/01</u>		
14. Response Due Date: <u>06/25/01</u> Corrective Action Plan Required: <u>Yes</u>		
15. Concurrence:	 <u>5/24/01</u> Date	<u>N/A</u> Responsible Assistant Manager
	 <u>5/24/01</u> Date	 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: _____		 Date
19b. Trend Cause Code: _____		
20. Closure: _____		
 Quality Assurance Manager	 Date	

CORRECTIVE ACTION REPORT

1. CAR No.: 01-036	2. Activity Report No.: A-01-012	3. Page <u>1</u> of <u> </u>
4. Controlling Document: 4-H80-776-ASRF-007, Visual Examination for Confirmation of RTR	5. CBFO Assessment Team Leader: Sam Vega	
6. Responsible Organization: : RFETS	7. CAQ Was Discussed With: Frank Grady, Carol Ferrera	
8. Requirement that was violated: The total visual examination process is audio/videotaped with the visual examiner or VEE providing an audio narrative of each step and/or activity in the process.		
<p>9. Condition Adverse to Quality:</p> <p>The video taping of visual examination (VE) activities on drums D19003, D68384, D94680, and D94354 demonstrated that the process does not consistently provide a complete quality record. Examples are:</p> <ul style="list-style-type: none"> • Inside of the drum once items are removed • Placement of items on scale • Liner type and closure (told it's a pigtail, etc.) • Observation of percent fill • Bottom of drum for liquids • Observation of check weights ID's and calibrations, scale ID and calibration • Examination of items sent to a glovebox 		
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): Yes	
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>Charles L. Riggs</u> Date: <u>May 21, 2001</u>		
14. Response Due Date: <u>June 25, 2001</u> Corrective Action Plan Required: YES		
15. Concurrence:	<u>Sam A. U.</u> <u>5/24/01</u> <small>Assessment Team Leader</small> <small>Date</small>	<u>N/A</u> _____ <small>Responsible Assistant Manager</small> <small>Date</small>
	<u>Sam A. U.</u> <u>5/24/01</u> <small>Quality Assurance Manager</small> <small>Date</small>	
16. Corrective Actions Proposed by the Responsible Organization: Use CAR Continuation Sheet		
17. Acceptance of Proposed Corrective Actions:		
_____	_____	
<small>Assessment Team Leader</small>	<small>Date</small>	
18. Verification of Corrective Action Completion: (Use CAR Continuation Sheet)		
19a. Verified By: _____		
19b. Trend Cause Code: _____		
20. Closure: _____		
	<small>Quality Assurance Manager</small>	<small>Date</small>

CORRECTIVE ACTION REPORT

1. CAR No.: 01-037	2. Activity Report No.: A-01-12	3. Page <u>1</u> of <u> </u>
4. Controlling Document: Quality Assurance Program Document, CAO-94-1012	5. CBFO Assessment Team Leader: S. Vega	
6. Responsible Organization: : RFETS	7. CAQ Was Discussed With: J. Stewart, T. Donohoue, Franco, S. Ailes, and Larry McInroy	
8. Requirement that was violated: (see attached sheet for details)		
9. Condition Adverse to Quality: Quality affecting work steps are not being performed in accordance with written controlled procedures (see attached sheet for details)		
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): Yes 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>James R. Schuetz</u> <i>James R. Schuetz</i> Date: <u>05/21/01</u>		
14. Response Due Date: <u>June 25, 2001</u> Corrective Action Plan Required: <input checked="" type="checkbox"/> YES		
15. Concurrence: <u><i>Sam A. You</i></u> Assessment Team Leader	<u>5/21/01</u> Date	<u>N/A</u> Responsible Assistant Manager
<u><i>Sam A. You</i></u> Quality Assurance Manager	<u>5/24/01</u> Date	Date
16. Corrective Actions Proposed by the Responsible Organization: Use CAR Continuation Sheet		
17. Acceptance of Proposed Corrective Actions: _____ Date _____ Assessment Team Leader		
18. Verification of Corrective Action Completion: (Use CAR Continuation Sheet)		
19a. Verified By: _____ Date _____		
19b. Trend Cause Code: _____		
20. Closure: _____ Date _____ Quality Assurance Manager		

CBFO CORRECTIVE ACTION REPORT

(continuation sheet)

1. CAR No.:	2. Activity No.:	3. Page <u>2</u> of <u>2</u>
<p>Block # <u>8</u> Requirement that was violated:</p> <p>QAPD, Section 1.4.2, Documents that specify requirements, prescribe processes, or establish design important to the compliance application, nuclear safety, waste characterization, or waste isolation, such as instructions, procedures, drawings, test plans, management plans, technical reports, performance reports, and test reports shall be controlled.</p> <p>Block # <u>9</u> Condition Adverse to Quality:</p> <p>The following were identified as conditions adverse to quality during the A-01-12 audit.</p> <ul style="list-style-type: none">• During the audit team's review of the TGS NDA system located in building 569, an uncontrolled copy of the "Trouble Shooting Guide" used to make adjustments to the TGS instrument as directed by procedure PRO-1006-TGS-569-01, Rev 1 was observed.• Instruction NDA-29, "Instructions for Conducting Independent Technical Review (ITR) of SuperHENC/SGEAS Data" is a quality effecting document and is not being handled as a controlled document.• IPAN and FRAM data, used in isotopic analysis, are transferred between computer hardware platforms via floppy diskette. Steps for this transfer are detailed in Work Instruction NDA-34 in lieu of a controlled procedure as required for quality affecting work and calculations.• TGS data transfer steps are detailed in Work Instruction NDA-34 in lieu of a controlled procedure as required for quality affecting work.		