



United States Government

Department of Energy

memorandum

 Carlsbad Field Office
 Carlsbad, New Mexico 88221

DATE: December 10, 2001

REPLY TO
ATTN OF: CBFO:QA:TJR:KJB 01-1835 UFC 2300

SUBJECT: Issuance of Corrective Action Reports (CARs) 02-023 through 02-027

to: John Schneider, Acting AM for TRU Waste Management



The Carlsbad Field Office (CBFO) performed Audit A-02-05 of the Rocky Flats Environmental Technology Site (RFETS) on November 27-30, 2001. As a result of the audit CBFO CARs 02-023 through 02-027 are attached.

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 -7311.

/s/ signature on file
 Thomas J. Reese
 Acting QA Manager

Attachments

cc w/attachments:

K. Watson, CBFO	*ED
L. Chism, CBFO	
J. Jefferies, RFFO	*ED
C. Ferrera, RFETS	*ED
J. O'Leary, RFETS	*ED
R. A. Eschenbaum, RFETS	*ED
M. Eagle, EPA	*ED
S. Monroe, EPA	*ED
S. Zappe, NMED	*ED
B. Walker, EEG	*ED
D. Winters, DNFSB	*ED
M. Gerle, WTS Operating Record	
J. Schuetz, CTAC	*ED
M. Horseman, CTAC	*ED
T. Bowden, CTAC	

*ED denotes Electronic Distribution

011204



CORRECTIVE ACTION REPORT

1. CAR No.: 02-023	2. Activity Report No.: A-02-05	3. Page <u>1</u> of																				
4. Controlling Document: PRO-1031-WIPP, Rev. 0		5. CBFO Assessment Team Leader: Jerry Reese																				
6. Responsible Organization : RFETS TWCP		7. CAQ Was Discussed With: Jeff Harrison and Vivian Sendelweck																				
8. Requirement that was violated: See continuation sheet.																						
9. Condition Adverse to Quality: See continuation sheet.																						
10. Suggested Actions (Optional): 																						
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13. CAR Initiator: <u>Steve Calvert/Wayne Ledford</u> Date: <u>November 30, 2001</u>																						
14. Response Due Date: <u>January 7, 2002</u> Corrective Action Plan Required: YES																						
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Quality Assurance Manager	Date																					
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CDFO CORRECTIVE ACTION REPORT

(continuation sheet)

1. CAR No.: 02-023

2. Activity No.: A-02-05

3. Page ___ of ___

Block # 8

PRO-1031-WIPP-1112, Rev. 0, Section 8.0[7]:

If corrections are required – And if the reason for the change is unclear, then provide an explanation in the comments section.

PRO-1031-WIPP-1112, Rev. 0, Section 10:

“... the TRU waste organization, TRU waste validator and the data reviewer are all authorized to correct Appendix 1 data, ...”

Block # 9

Visual Verification packaging data entry form reviewed had changes that are unclear and no explanation has been provided for the changes.

Package #S00922 estimated weight percents were changed from “Organic Matrix” to “other inorganic materials” This change was not performed by the original validator, originator, or data reviewer.

Package #S00858 estimated weight percent was changed from 25% to 23% for “Plastics”

CBDO CORRECTIVE ACTION REPORT

(continuation sheet)

1. CAR No.:

2. Activity No.:

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Block #_

CORRECTIVE ACTION REPORT

1. CAR No.: 02-025	2. Activity Report No.: A-02-05	3. Page <u>1</u> of																
4. Controlling Document: 95-QAPjP-0050, Revision 5	5. CBFO Assessment Team Leader: Jerry Reese																	
6. Responsible Organization: : RFETS VE	7. CAQ Was Discussed With: Jim Ferguson and Ron Robledo																	
8. Requirement that was violated: 95-QAPjP-0050, Section B1-3b(3) Standardized training for VE has been developed to include both formal classroom training and OJT. Personnel performing VE are instructed in the specific waste generating processes, typical packaging configurations, and the waste material parameters expected to be found in each Waste Matrix Code at RFETS. The OJT and apprenticeship is conducted by an SME, supervisor, VEE, or an operator experienced and qualified in VE prior to qualification of the candidate.																		
9. Condition Adverse to Quality: Workers performing VE and identifying waste items are not trained in VE. VE Experts are stationed outside of the enclosure and are told by workers inside what the items are.																		
10. Suggested Actions (Optional):																		
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CORRECTIVE ACTION REPORT

1. CAR No.: 02-026	2. Activity Report No.: A-02-05	3. Page <u>1</u> of																
4. Controlling Document: WAP & 95-QAPjP-0050 Revision 5	5. CBFO Assessment Team Leader: Jerry Reese																	
6. Responsible Organization: : RFETS HSG	7. CAQ Was Discussed With: Charlie Turner and Kristy Henderson																	
8. Requirement that was violated: B3-10 data review determines if raw data have been properly collected and ensures raw data are properly reduced. B-4a(1) Headspace Gas Sampling and Analysis – to identify VOCs and quantify the concentrations of VOC constituents in the total waste inventory to ensure compliance with the environmental performance standards of 20 NMACC 4.1.500 (incorporating 40 CFR, 264.601(c0), and to confirm hazardous waste identification by acceptable knowledge.																		
9. Condition Adverse to Quality: Target Compound Identification Verification in Data Package HGAS-DP-00004 used incorrect reference spectra for comparison to probable Target Analyte compounds. This error was not identified during any of the three reviews (ITR, TS, or QAO).																		
10. Suggested Actions (Optional): 																		
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CORRECTIVE ACTION REPORT

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4. Controlling Document: QAPD Revision 3	5. CBFO Assessment Team Leader: Jerry Reese																	
6. Responsible Organization: : RFETS HSG	7. CAQ Was Discussed With: Joe Reynolds, Frank Grady, and Charlie Turner																	
8. Requirement that was violated: QAPD Section 2.1.2, <i>Implementing Procedures</i> : Implementing procedures shall include the following information as appropriate to the work to be performed: 1. Responsibilities of the organizations affected by the document. 2. Technical, regulatory, quality assurance, or other program requirements. 4. Quantitative or qualitative acceptance criteria sufficient for determining that activities were satisfactorily accomplished.																		
9. Condition Adverse to Quality: Three out of four procedures for HSG Sampling and Analysis had inaccuracies in work processes and/or responsibilities. The three procedures are L-4231-D, L-4053-D, and L-4321-C.																		
10. Suggested Actions (Optional): 																		
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