

Mr. D. K. Pluetz

-2-

October 21, 2008

cc: w/enclosure

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RCRA Operating Record, MS: 452-09

CBFO QA File

CBFO M&RC

*ED denotes electronic distribution

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Remedial Actions

The remedial actions were verified as complete and determined to be adequate in CBFO letter from Dennis S. Miehl to David H. Haar, CBFO:QA:DSM:KBS:08-0395:UFC 2300.00, *Evaluation of the Remedial Actions for Corrective Action Report 08-025, Los Alamos Nation Laboratory Central Characterization Project*, dated July 18, 2008.

Investigative Actions

The investigative actions appear to be adequate.

Root Cause Analysis

Documentation demonstrates that a thorough and comprehensive Root Cause Analysis was performed. The root cause was identified as failure to evaluate the most recent Nondestructive Examination (NDE) characterization data.

Action to Preclude Recurrence

1. Issue a Lessons Learned to communicate management expectations.

Verified by review of CCP-LL-2008-13: *Shipment of Drum With Unresolved Nonconformance Report*, dated June 30, 2008.

2. Revise CCP-TP-002 and CCP-TP-030 to incorporate Standing Orders CCP-SO-32 and CCP-SO-33, respectively.

Verified by review of CCP-TP-002, *CCP Reconciliation of DQOs and Reporting Characterization Data*, Revision 20, dated 08/18/2008 and CCP-TP-030, *CCP CH TRU Waste Certification and WWIS Data Entry*, Revision 24, dated 08/20/2008.

3. Evaluate the following potential refinements to the wire tie: 1) Use of a flexible wire tie which is crimped in place, and 2) Use of a more durable (e.g., thicker) plastic tag.

Verified by review of e-mail dated July 16, 2008, from Mark Percy to Distribution, summarizing the evaluation of NCR cable ties and NCR material samples, and identifying the ties and NCR material to be used. The new 'Hold Tags', wire ties, and cable seals were observed in use at all four CCP sites presently processing contact-handled (CH) waste during CBFO Surveillance S-08-19.

4. Unload drum LAS817174 from SWB and visually inspect to verify the absence of a CCP Hold Tag.

Verified by review of CCP memorandum AA:08:00795, TRANSMITTAL OF ROOT CAUSE ANALYSIS REPORT FOR THE SHIPMENT OF A DRUM WITH AN UNRESOLVED NONCOMFORMANCE REPORT IN A STANDARD WASTE BOX, dated July 18, 2008. The memo states in part, "It should be noted that on July 2, 2008, the errant drum was removed from

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the standard waste box (SWB) and was verified by WTS and LANL personnel, as well as state and federal regulators to not have an attached NCR HOLD tag and no loose tag was found inside the SWB.”

5. Issue the final Root Cause Analysis Report.

Verified by review of *Central Characterization Project Shipment of Drum with Unresolved Nonconformance Report in Standard Waste Box Root Cause Analysis Report*, dated June 26, 2008.

6. Reconfigure the Search 7 capability in the Data Center so that a “Yes” in the NCR Data column means that there is at least one open NCR against the drum.

Verified by review of CCP Software Change Order #1006 and associated documentation for changes to Search 7.

7. Document the process to be used for management review of drums removed from WWIS, for the purpose of identifying any observable adverse trends.

Verified by review of CCP Memorandum from D. K. Ploetz to Distribution, CP:08:00348, REVISED PROCESS FOR REMOVAL OF CERTIFIED WASTE CONTAINERS FROM WIPP WASTE INFORMATION SYSTEM, dated July 10, 2008.

8. Revise CCP-QP-019, *Quality Assurance Reporting to Management*, to include a section for reporting any adverse trends related to the removal of drums from WWIS.

Verified by review of CCP-QP-019, *CCP Quality Assurance Reporting to Management*, Revision 5, dated 08/26/2008.

9. Formally transmit appropriate training materials (including WCO-01, *WCO Training Manual*) to the WCO SPM for review by the WCO's.

Verified by review of CCP Memorandum from A. J. Fisher to M. Ramirez, CP:08:00332, TRANSMITTAL OF WCO-01, *WCO TRAINING MANUAL*, FOR REVIEW WITH CERTIFICATION OFFICIALS, dated July 2, 2008. Also reviewed *Waste Certification Official Training Manual*, (WCO-01 guide, Revision 1), dated 07/17/2008 and associated CCP Attendance Sheets.

10. Revise CCP-QP-005, *CCP TRU Nonconforming Item Reporting and Control*, to: 1) describe the process that CCP personnel use when performing open NCR checks and determining whether an NCR is “resolved” for a particular container (in conjunction with software changes to the PTS (NCR status) portion of the CCP Data Center), and 2) include additional language with respect to reconciliation of hold tags once the NCR's are cleared for containers.

Verified by review of CCP-QP-005, *CCP TRU Nonconforming Item Reporting and Control*, Revision 17, dated 08/27/2008. Also reviewed a computer printout demonstrating that required reading had been performed on the revised document.

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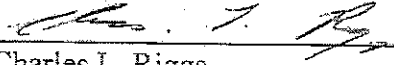
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Based on the detailed review of the CAR 08-025 Closure Package and verification of objective evidence submitted, it is recommended that CAR 08-025 be closed.

Verification Performed By:


Charles L. Riggs

10/17/03
Date