



Department of Energy  
 Carlsbad Field Office  
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FEB 3 2011



Mr. D. K. Ploetz, Manager  
 Central Characterization Project  
 Washington TRU Solutions, LLC  
 P.O. Box 2078  
 Carlsbad, NM 88221-2078

Subject: Evaluation of the Revised CAP for CBFO CAR 11-015 from Surveillance S-11-10, SRS/CCP

Dear Mr. Ploetz:

Enclosed are the results of the Carlsbad Field Office (CBFO) evaluation of the revised Corrective Action Plan (CAP) written in response to CBFO Corrective Action Report (CAR) 11-015, which was identified during Surveillance S-11-10 of the Savannah River Site Central Characterization Project (SRS/CCP). The results of the evaluation are documented on the enclosed CAR Continuation Sheet, which indicates approval. Please provide supporting documentation to CBFO as evidence of completion of the corrective actions by the due date noted in the CAP.

If you have questions, please contact me at (575) 234-7491.

Sincerely,

Dennis S. Miehls  
 Acting Director of the Office of Quality Assurance

Enclosure

cc: w/enclosure

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\*ED denotes electronic distribution



CBFO Form 3.1-2

### CAR CONTINUATION SHEET

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**Block # 16 Acceptance of Proposed Corrective Actions:**

An evaluation has been performed of the proposed corrective actions detailed in the SRS/CCP revised corrective action plan (CAP) developed in response to CBFO Corrective Action Report (CAR) 11-015. The CAP was submitted via URS/WTS letter CP:11:01063, dated January 26, 2011, from Mr. D. K. Ploetz, Manager, Central Characterization Project Retrieval, Characterization and Transportation, to Mr. D. S. Michls, Senior Quality Assurance Specialist, Carlsbad Field Office.

*Italicized text, taken verbatim from the CAP, is used to show the correlation between the proposed corrective actions and evaluations performed by the audit team.*

**Proposed Remedial Actions:**

*CCP has identified the following remedial actions in response to the CAR condition:*

- a) *CCP has issued Standing Order CCP-SO-070, Revision Original, clarifying the circumstances under which the location of dense or sharp/heavy objects must be recorded in Radiography Data Sheets. The Standing Order states that it will remain in effect until CCP-TP-053 is revised to incorporate the clarification into the procedure.*
- b) *CCP has revised Batch Data Report SRLBR0002 to identify the location of dense or sharp/heavy materials inside containers SR57053103 and SR57171701.*

CBFO CAP Evaluation For Proposed Remedial Actions: Acceptable

**Proposed Investigated Actions:**

*Extent*

*Only four Standard Large Boxes (SLB2s) have been run through the Large Container NDE to date. CCP reviewed preliminary information associated with other Standard Large Boxes (SLB 2's) and noted that some of the waste consisted of metal debris. When additional SLB2s are characterized through the Large Container NDE, the results will be documented in accordance with Standing Order CCP-SO-070.*

*Impact*

*The requirement for recording the locations of sharp/heavy objects contained in CCP-TP-053 (Rev. 9, Section 4.4.3) [E.1]) is based on ensuring that TRAMPAC requirements for protecting the containment integrity of the SLB2 are met. As recognized by CBFO in the reference, containers SR57053103 and SR57171701 are both fully compliant with TRAMPAC requirements. There are no sharp or heavy objects in the payload container which have the potential to puncture these SLB2s under normal conditions for transport, as verified by radiography. There were no dense waste materials, (i.e., impenetrable objects) which prevented the Data Quality Objectives (DQOs) for radiography from being met. CBFO clarified in the reference that CAR 11-015 was issued for lack of documentation, specifically recording the location of dense waste material, sharp/heavy objects. For this reason, as discussed in the Remedial Actions section of this Corrective Action Plan, CCP has revised BDR SRLBR0002 to identify the location of heavy/sharp materials inside containers SR57053103 and SR57171701.*

CBFO CAP Evaluation For Proposed Investigated Actions: Acceptable

CBFO Form 3.1-2

### CAR CONTINUATION SHEET

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**Proposed Root Cause Determination:**

*The subjectivity of the term "sharp/heavy objects" led to different interpretations by CCP and CBFO on the way that sharp/heavy objects should be defined. CCP interpreted sharp/heavy objects based on Revision 2 of the TRUPACT-III TRAM PAC (Section 2.6.1) which states: "Sharp or heavy objects in the payload container shall be blocked, braced, or suitably packaged as necessary to provide puncture protection for the payload container packaging these items." Based on the nondestructive examination performed by CCP's qualified radiographers, there were no sharp/heavy objects in the payload container that could puncture the SLB2 payload container, as documented in Section 5 of Attachment 2 for the BDR. Therefore, CCP's interpretation was that the requirement in Section 4.4.3 [E.1] of CCP-TP-053 to record location did not apply. CBFO had a different interpretation of what constitutes a sharp/heavy object; under this interpretation, the requirement to identify the location of sharp/heavy objects applied regardless of whether container integrity is in question.*

*CCP agrees that the definition of what constitutes a sharp/heavy object is subjective and therefore is open to different interpretations. In order to address this condition, CCP will develop guidelines/examples for a qualified real-time radiographer to use in making their determinations, as discussed below in the Actions to Prevent Recurrence. These guidelines will be consistent with the changes being made to CCP-TP-053 as currently being implemented by Standing Order CCP-SO-070.*

CBFO CAP Evaluation For Proposed Root Cause Determination: Acceptable

**Proposed Actions to Prevent Recurrence:**

*CCP has determined that the following actions are appropriate to prevent recurrence of the CAR condition:*

- a) Revise CCP-TP-053, Section 4.4.3 [E.1] to read: "Locations of dense waste material, sharp/heavy objects if container is to be rejected for transportation packaging issues." Either this or similar wording will be used to clarify the intent of what is to be recorded.*
- b) Revise CCP-TP-053 to include TRAMPAC requirements for the SLB2.*
- c) Develop guidelines/examples for a qualified real-time radiographer to use in making a determination about what constitutes a sharp/heavy object and determining whether it is adequately blocked, braced or packaged.*
- d) Provide documented training to the real-time radiographers who are qualified to NDE boxes on the application of these guidelines/examples.*

CBFO CAP Evaluation For Proposed Actions to Prevent Recurrence: Acceptable

The results of the evaluation indicate that the remedial actions, investigative actions, root cause determination, and actions to prevent recurrence should adequately address the CAR condition. Therefore, it is recommended that the revised CAP for CAR 11-015 be approved.

Evaluation Performed By:  Port Martinez

Date: 2/3/2011