 **ENTERED**
Department of Energy
Carlsbad Field Office
P. O. Box 3090
Carlsbad, New Mexico 88221



MAY 12 2011

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

Subject: Evaluation of the CAP for CAR 11-028 from Audit A-11-10

Dear Mr. Ploetz:

The Carlsbad Field Office (CBFO) performed Audit A-11-10 of the Hanford Site Central Characterization Project on April 5 -7, 2011. CBFO Correction Action Report (CAR) 11-028 was issued as a result of that audit.

Enclosed are the results of the CBFO review of the Washington TRU Solutions (WTS) proposed Corrective Action Plan (CAP) for CAR 11-028. The evaluation of the proposed corrective actions is documented on the enclosed CAR Continuation Sheet. The results of the review indicate that the CAP for CAR 11-028 is conditionally acceptable, as documented in the CAP evaluation.

Upon completion of all corrective actions, please provide notification and documentation supporting closure so that verification activities may be performed. In addition, the required closure date for this CAR is May 23, 2011, not May 26, 2011, as listed in the CAP.

If you have any questions or concerns regarding this evaluation, please contact me at (575) 234-7483.

Sincerely,

Martin P. Navarrete
Senior Quality Assurance Specialist

Enclosure



Mr. D. K. Ploetz

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cc: w/enclosure

R. Unger, CBFO	*ED
J. R. Stroble, CBFO	ED
D. Miehl, CBFO	ED
H. Budweg, CBFO	ED
N. Castaneda, CBFO	ED
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R. Dunn, Hanford	ED
D. Haar, WTS/CCP	ED
V. Cannon, WTS/CCP	ED
A. J. Fisher, WTS/CCP	ED
M. Walker, WTS/CCP	ED
Y. Salmon, WTS/CCP	ED
J. Hoff, WTS	ED
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P. Gilbert, LANL-CO	ED
G. Lyshik, LANL-CO	ED
E. Bradford, CTAC	ED
P. Hinojos, CTAC	ED
G. White, CTAC	ED
P.Y. Martinez, CTAC	ED
P. Gomez, CTAC	ED
WIPP Operating Record	ED
CBFO QA File	
CBFO M&RC	

*ED denotes electronic distribution

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2. Activity No: A-11-10

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Block # 16 Acceptance of Proposed Corrective Action

The following is an evaluation of the proposed Corrective Action Plan (CAP) for CBFO CAR 11-028 submitted via URS/Washington TRU Solutions letter CP:11:01302 UFC: 2300.00, dated May 3, 2011, from D. K. Ploetz to Mr. Martin P. Navarrete. 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.

REMEDIAL ACTIONS

CCP has taken the following remedial action in response to the CAR condition:

- a) *CCP has completed the required Hanford data quarterly repeat reviews for all calendar quarters since CCP began producing BDRs, for RTR, HSG, and VE. In all cases, the quarterly repeat reviews were consistent with the results from the original BDRs: no deficiencies were identified.*
- b) *As noted in the Extent section of this Corrective Action Plan, CCP reviewed the status of performance of data generation level quarterly repeat reviews at all other host site locations. In all cases, CCP was current with quarterly repeat reviews.*
- c) *Standing Order CCP-SO-061 was revised to clarify quarterly reviews will begin the calendar quarter following characterization, regardless of certification status.*

Evaluation:

Review of the proposed CAP associated with Remedial Actions submitted by the above referenced letter determined that the proposed corrective actions are acceptable.

INVESTIGATIVE ACTIONS

Extent

CCP reviewed the status of performance of data generation level quarterly repeat reviews at all other host site locations. In all cases, CCP was current with quarterly repeat reviews: requests had been made for the repeat reviews for the first calendar quarter of 2011, and quarterly repeat reviews were complete for all quarters prior to 2011. The CAR condition is limited to the CCP scope of work at the Hanford Site.

Impact

Performance of the data quarterly repeat reviews is a quality check on one, previously-completed BDR at each host site location where CCP performs characterization. In accordance with CCP procedures, the original BDRs are independently reviewed by an Independent Technical Reviewer and a Site Project Manager at the time they are produced. Failure to perform data quarterly repeat reviews is considered to have no impact.

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More importantly, as noted in the Remedial Actions section of this Corrective Action Plan, CCP has completed the required Hanford data quarterly repeat reviews for all calendar quarters since CCP began producing BDRs at the host site, for RTR, HSG, and VE. In all cases, the quarterly repeat reviews were consistent with the results from the original BDRs: no deficiencies were identified. As a consequence, there is no technical or quality impact from the CAR condition.

Evaluation:

Review of the proposed CAP associated with Investigative Actions submitted by the above referenced letter determined that the proposed corrective actions are conditionally acceptable, provided that the closure documentation submitted for closure of CAR 11-028 specifically addresses re-review of generation-level data for at least one waste container in a selected BDR. The CCP procedural requirement, as well as the Permit, specifies, "a minimum of one randomly selected waste container," not BDRs. The re-review of generic BDRs may or may not accomplish the intended evaluation.

ROOT CAUSE DETERMINATION

In March 2010, prior to the April 2010 initial certification audit, the Lead SPM at Hanford was sent an e-mail by her manager reminding her about the need to begin requesting and processing quarterly repeat reviews for Hanford BDRs. The opening sentence of this e-mail began as follows: "Now that we should get certified during the next quarter, on April 1 [2010] submit letters to perform QTRLY reviews for the quarter from Jan through March 2010." The e-mail closes with the statement, "This will demonstrate to the auditors that we are following the permit for quarterly reviews."

At the time the e-mail was sent, CCP had been producing BDRs at Hanford for only a short while. The Lead SPM at Hanford left CCP in May, 2010, so CCP is unable to ascertain exactly why she failed to follow through the direction provided by her manager in March 2010. However, it appears that she may have misinterpreted the opening sentence in the e-mail: "Now that we should get certified" and understood it to mean that data quarterly repeats were not actually required until after CCP had been certified at Hanford.

For reasons unrelated to the CAR condition, CCP did not become certified at Hanford until January 20, 2011, nine months after the initial certification audit. By the time the Lead SPM left CCP in May, 2010, the consensus within the CCP team at Hanford was that quarterly repeat reviews were not required until certification; the current Lead SPM simply continued to follow this interpretation that the requirement for performing quarterly repeat reviews did not apply until Hanford was certified.

As discussed below, the action to prevent recurrence for a previous CAR associated with quarterly repeat reviews, CAR 10-029, was for CCP to issue Standing Order CCP-SO-06, which requires the Project Office to track all quarterly repeat reviews to ensure they are being completed in a timely manner. Standing Order CCP-SO-061 was written based on the assumption that the sites where quarterly repeat reviews were being performed were already certified. Standing Order CCP-SO-061 did not address the special case of performing quarterly repeat reviews at a site that was in the process of being certified. CCP was already certified at all other major DOE sites with the exception of Hanford. It is not known why the previous Lead SPM at Hanford, who resigned from CCP around the time that the first set of quarterly repeat reviews were due, did not perform this task. Clear

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direction was not given to the current Lead SPM that quarterly repeat reviews were required. This allowed the propagation of an alternate interpretation that quarterly repeat reviews were not required until Hanford became certified in January 2011.

Effectiveness of Previous Corrective Actions

In June 2010, CCP received CBFO CAR 10-029 for failure to have performed quarterly repeat reviews for Headspace Gas Sampling (HSG) BDRs. For that CAR, the cause was miscommunication between the site SPMs and the Senior Chemical Technical Specialist. The site SPMs thought that the Senior Chemical Technical Specialist was performing the HSG quarterly repeat reviews for all sites. The Senior Chemical Technical Specialist was performing the re-reviews, but only for one per site per quarter.

The action to prevent recurrence for CAR 10-029 was for CCP to issue Standing Order CCP-SO-061, which requires the SPM Team Lead in the Project Office to track all quarterly repeat reviews to ensure that they are being completed in a timely manner. The SPM Team Lead in the Project Office has been complying with Standing Order CCP-SO061, but that did not prevent the condition reported in CAR 11-028 from occurring.

During the current investigation, the SPM Team Lead in the Project Office stated that he was aware that quarterly repeat reviews were not being performed for Hanford BDRs, but considered this to be acceptable, because he also was under the impression that the re-reviews were not mandatory until after CCP had become certified at Hanford.

The Action to Prevent Recurrence section of this Corrective Action Plan addresses and resolves the effectiveness issue with the corrective action taken in response to CAR 10- 029.

Evaluation:

Review of the proposed CAP associated with Root Cause Determination submitted by the above referenced letter determined that the root cause determination is complete and acceptable.

ACTIONS TO PREVENT RECURRENCE

Based on the results of the Investigative Actions undertaken by CCP, CCP has determined that the following action is appropriate to prevent recurrence of the CAR condition:

- a) *CCP has revised Standing Order SO-CCP-0061 , which explicitly states that data generation level quarterly repeat reviews are required in the quarter after BDRs are produced at Data Generation Level, prior to certification.*

Evaluation:

Review of the proposed CAP associated with actions to prevent recurrence submitted by the above referenced letter determined that the proposed corrective action is acceptable.

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CAR CONTINUATION SHEET

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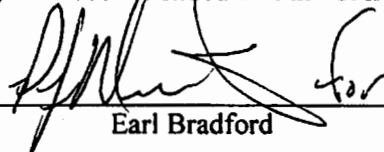
2. Activity No: A-11-10

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ACCEPTANCE

The proposed corrective actions for remedial actions, root cause determination, and actions to prevent recurrence are acceptable. The proposed corrective action associated with the investigative action is conditionally acceptable provided the objective evidence provided for closure of this CAR specifically addresses re-review of data associated with the selection of waste containers, rather than only addressing randomly selected BDRs. Contingent upon submission of the final closure documentation, it is recommended that the CAP for CAR 11-028 be approved.

Response Evaluated By:


Earl Bradford

5/5/2011
Date