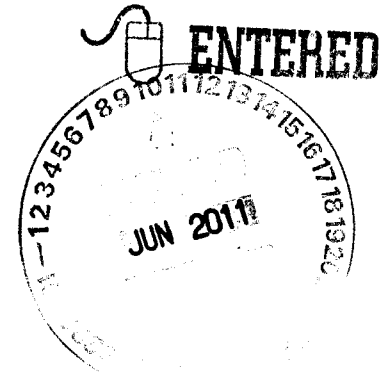


Department of Energy
 Carlsbad Field Office
 P. O. Box 3090
 Carlsbad, New Mexico 88221
 JUN 10 2011



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

Subject: Evaluation of the Documentation Supporting Closure of CAR 11-029 from Audit A-11-10

Dear Mr. Ploetz:

The results of the Carlsbad Field Office (CBFO) evaluation of documentation supporting completion of the corrective actions associated with Corrective Action Report (CAR) 11-029, resulting from Recertification Audit A-11-10 of the Hanford Central Characterization Project, are documented on the enclosed CAR Continuation Sheet. Corrective actions have been verified and determined to be adequate for precluding recurrence. Accordingly, CAR 11-029 is considered closed.

If you have any questions or comments, please contact me at (575) 234-7483.

Sincerely,

Martin P. Navarrete
 Senior Quality Assurance Specialist

Enclosure

cc: w/enclosure

R. Unger, CBFO	*ED	E. Feltcorn, EPA	ED
J. R. Stroble, CBFO	ED	R. Joglekar, EPA	ED
H. Budweg, CBFO	ED	S. Ghose, EPA	ED
N. Castaneda, CBFO	ED	R. Lee, EPA	ED
L. Romine, DOE-RL	ED	J. Kieling, NMED	ED
J. Norton, DOE-RL	ED	S. Holmes, NMED	ED
R. Dunn, Hanford	ED	T. Hall, EPA	ED
V. Cannon, WTS/CCP	ED	T. Kesterson, DOE OB WIPP NMED	ED
A. J. Fisher, WTS/CCP	ED	D. Winters, DNFSB	ED
I. Quintana, WTS/CCP	ED	P. Gilbert, LANL-CO	ED
L. Porter, WTS/CCP	ED	G. Lyshik, LANL-CO	ED
M. Walker, WTS/CCP	ED	P. Hinojos, CTAC	ED
Y. Salmon, WTS/CCP	ED	G. White, CTAC	ED
J. Hoff, WTS	ED	P. Y. Martinez, CTAC	ED
M. A. Mullins, WTS	ED	WIPP Operating Record	ED
T. Peake, EPA	ED	CBFO QA File	
M. Eagle, EPA	ED	CBFO M&RC	

*ED denotes electronic distribution



CBFO Form 3.1-2

CAR CONTINUATION SHEET

1. CAR No: 11-029

2. Activity No: A-11-10

3. Page 1 of 2

CBFO has reviewed the CAR 11-029 closure package, including objective evidence and supporting documentation submitted via URS letter QA:11:01406 UFC:2300.00, D. K. Ploetz to Martin P. Navarrete, Transmittal of Documentation Supporting Completion of the Corrective Actions Associated with CBFO Corrective Action Report 11-029.

Italicized text, taken verbatim from the CAP, is used to show the correlation between the corrective action and the method used for verification.

REMEDIAL ACTIONS

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

- a) *CCP has revised Standing Order or Operator Aid CCP-SO-RL-01 to add the weight of the "Rad Pad" Universal polypropylene (UPP) absorbent pads to the list of weights for packaging material.*

Verification:

Verified that CCP Standing Order (SO) CCP-SO-RL-01 was revised to Rev. 4. "2 inch thickness of Rad Pads or Universal Polypropylene (UPP) – 1.0 kg" was added under the "Order" heading of the SO. Rev. 4 was approved on May 4, 2011.

INVESTIGATIVE ACTIONS

Extent

The Acceptable Knowledge Summary Report (CCP-AK-RL-116) cited in the CAR is the only AK document that identifies absorbent pads as either waste or packaging material. CCP-AK-RL-101 also lists absorbent pads, but only as a waste item. No AK documents for other CCP host locations refer to absorbent pads as either a waste or as packaging; the extent of the CAR condition is therefore limited to CCP-AK-RL-116 at Hanford.

Impact

Although there was an inconsistency in how RTR operators chose to classify Rad Pads as packaging material or waste, there is no technical impact against the requirements of the WAP. The weights for all materials in the affected containers are accounted for in the RTR Data Sheets. The information in the completed RTR BDRs is adequate to ensure that all requirements of the WAP are satisfied, and that the three containers represented by this BDR can be WAP-certified for disposal. None of the criteria for WAP-certification depends in any way on a re-organization or re-arrangement of the data currently entered in the RTR-BDRs for the containers in CCP-AK-RL-116.

Verification:

These actions were accepted by the CBFO CAP acceptance letter CBFO:OQA:MPN:MAG:1100580:UFC 2300.00 on June 2, 2011. No further verification is required.

ROOT CAUSE

Section 2.0 of CCP-AK-RL-116, Revision 0, provides a listing of examples of potential waste items in the waste stream, the list includes: "Plastics: Universal polypropylene (UPP) absorbent pads, tape, poly tubing, poly bottle, bags, quick-connects, rubber bands, sampling equipment." Section 5.4.2 of the same AK document contains a list of waste items that potentially could be in the waste stream; this list contains the same reference to UPP absorbent pads that is quoted above. "Rad Pads" is the way that these UPP absorbent pads are informally referred to at Hanford.

CBFO Form 3.1-2

CAR CONTINUATION SHEET

1. CAR No: 11-029	2. Activity No: A-11-10	3. Page 2 of 2
-------------------	-------------------------	----------------

As noted in the Extent section of this Corrective Action Plan. "Rad Pads" are specific to the Hanford Site. For this reason, operators were not as familiar with them as they are with other packaging materials commonly used at DOE sites such as rigid liners and liner bags. As noted in the CAR, Section 5.5 (Waste Packaging) of the AK does refer to the presence of absorbent pads between the liner and the bottom of the drum. Given their relative unfamiliarity with the absorbent pads used as packaging material, an RTR operator may have been influenced by the AK listings that show absorbent pads as examples of potential waste items in the waste stream, and consequently chose to classify the Rad Pads as waste instead of packaging. This created an inconsistency, with other RTR operators, who classified the Rad Pads as packaging. Based on CCP-AK-RL-116, Rev. 0, both interpretations are correct: Rad Pads may be classified as Packaging Material (Section 5.5) or as Waste (Sections 2.0 and 5.4.2). However, CCP expects RTR operators to be consistent in the way they classify Rad Pads (in this case, as packaging material). The Action to Prevent Recurrence section of this Corrective Action Plan addresses this consistency issue.

Verification:

These actions were accepted by the CBFO CAP acceptance letter
CBFO:OQA:MPN:MAG:1100580:UFC 2300.00 on June 2, 2011. No further verification is required.

ACTIONS TO PRECLUDE RECURRENCE

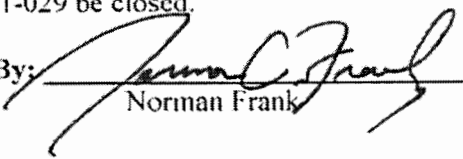
Based on the results of the Investigative Actions undertaken by CCP, CCP has determined that the following action is appropriate to prevent recurrence of the CAR condition.

- a) In order to improve consistency, CCP will brief RTR operators on CCP-AK-RL-116, which provides guidance for determining whether material inside a container is to be classified as waste material or packaging material. This guidance will be provided as a documented briefing and will reinforce the initial briefing for CCP-AK-RL-116.

Verification:

Viewed CCP Attendance Sheet for "Refresher RTR Training for AK CCP-AK-RL-116, Rev. 0, dated 5/19/2011. Six individuals attended the refresher training and signed the CCP Attendance Sheet. Viewed slides for "Refresher RTR Training for Acceptable Knowledge Summary Report," subtitled "Hanford Plutonium Finishing Plant (PFP) Contact-Handled Transuranic Solidified Plutonium Nitrate Waste." The main topics included "Waste Packaging." Slide 6 mentioned "Rad Pads." Slide 8 classifies the Rad Pads as "packaging."

Based on the results of the review of the objective evidence included in the CAR 10-043 closure package, it is recommended that CAR 11-029 be closed.

Verification Performed By:  6/8/2011
Norman Frank Date