



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



August 25, 2011

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

Subject: Evaluation of the CAP for CAR 11-044 from Audit A-11-23

Dear Mr. Ploetz:

The Carlsbad Field Office (CBFO) performed Audit A-11-23 of the Sandia National Laboratories Central Characterization Project on July 13-15, 2011. CBFO Corrective Action Report (CAR) 11-044 was issued as a result of that audit.

Enclosed are the results of the CBFO review of the Washington TRU Solutions proposed Corrective Action Plan (CAP) for CAR 11-044. The results of the review and evaluation are documented on the enclosed CAR Continuation Sheet. The evaluation determined that the CAP adequately addresses the concerns identified in CAR 11-044; therefore, the CAP is acceptable.

Please return your CAR closure package to me on or before September 9, 2011.

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



D. K. Ploetz

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August 25, 2011

cc: w/enclosure

R. Unger, CBFO	* ED
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T. Morgan, CBFO	ED
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J. Hoff, WTS	ED
M. Mullins, WTS	ED
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T. Peake, EPA	ED
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S. Holmes, NMED	ED
T. Kesterson, DOE OB WIPP NMED	ED
D. Winters, DNFSB	ED
P. Gilbert, LANL-CO	ED
G. Lyshik, LANL-CO	ED
P. Hinojos, CTAC	ED
G. White, CTAC	ED
C. Castillo, CTAC	ED
WIPP Operating Record	ED
CBFO QA File	
CBFO M&RC	

*ED denotes electronic distribution

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CAR CONTINUATION SHEET

1. CAR No: 11-044

2. Activity No: A-11-23

3. Page 1 of 3.**Block # 16 Acceptance of Proposed Corrective Action**

The following is an evaluation of the proposed Corrective Action Plan (CAP) for Carlsbad Field Office (CBFO) Corrective Action Report (CAR) 11-044. The proposed CAP was submitted via URS Washington TRU Solutions, LLC letter No. CP:11:01536, UFC: 2300.00, dated August 16, 2011, from Mr. D. K. Ploetz to Mr. R. Unger. 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:

CCP has obtained correspondence from the Sandia STR addressing site-specific training requirements for CCP personnel. The correspondence lists the CCP positions: VE, Dose-to-Curie, RH Sampling, and Headspace Gas Sampling. The correspondence states that training requirements do not apply to CCP personnel since Sandia has determined that escort-in-lieu-of-training applies to them.

Evaluation:

Review of the proposed CAP associated with Remedial Actions, submitted by the above referenced letter, determined that the proposed corrective actions are acceptable. The Site Technical Representative (STR) correspondence (mentioned above) must be submitted with the CAR closure package.

INVESTIGATIVE ACTIONS***Extent***

The Host site, SNL, is responsible for establishing safety programs at their Site which protect the safety of all workers, including CCP. CCP works under the Host sites' established safety programs, and under the WIPP Site program as documented in WP 15-GM.02, Worker Safety and Health Program Description.

The purpose of the noted section in CCP-TP-500 is to ensure that CCP personnel working at a Host site are aware of, and therefore able to comply with, the Host site's safety requirements. There was no specific requirement to read SNL's health and safety plan as long as CCP was escorted by personnel who were familiar with the Host site's safety requirements. As discussed in more detail in the Root Cause Determination section of this Corrective Action Plan, one VE operator volunteered to become an escort under the Sandia program. This operator took the ESH/GET examination required by Sandia for anyone wishing to become an escort at Sandia. However, taking this safety-based training is not required prior to performing work at SNL, as long as personnel are escorted.

Impact

CCP personnel were always under escort by personnel who were knowledgeable of the requirements of SNL's health and safety requirements. This is the same control that was used to protect the CBFO auditors from exposure to unmitigated hazards. Therefore, there was no safety concern.

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CAR CONTINUATION SHEET

1. CAR No: 11-044

2. Activity No: A-11-23

3. Page 2 of 3.

The concerns expressed in the CAR have to do with Sandia internal safety controls, for personnel accessing their facilities. Safety concerns are normally covered outside of CCP's CBFO-certified program for characterization and certification of TRU waste for disposal at WIPP. They are not quality-affecting and therefore have no relationship to the data quality objectives for TRU waste characterization as defined in the Waste Analysis Plan and the RH TRU Waste Characterization Program Implementation Plan.

Evaluation:

Review of the proposed CAP associated with Investigative Actions determined that the investigative actions are acceptable.

ROOT CAUSE DETERMINATION

Sandia is a Small Quantity Site (SQS), and all characterization is performed in a single building on site. Operators have to access three rooms: their desks, a common work area, and a high bay housing the radiological hot cell. As with most SQS, characterization was performed in stages, with Visual Examination (VE) being the first method. Last November, Sandia sent a letter stating that VE operators did not require any site-specific training, as long as they were escorted by Sandia personnel. During continuing discussions with Sandia as characterization progressed, it was mutually agreed that Sandia did not require any CCP personnel, regardless of purpose, to have any site-specific training as long as they were under escort. Sandia did not send CCP a letter explicitly stating that escorting was an acceptable substitute for site-specific training, but this was generally understood by all parties-and that is the way Sandia actually controlled access to the building.

The CAR states that only one of six VE personnel read the applicable health and safety plan prior to performing work. One VE operator volunteered to become an escort under the Sandia program, in order to be able to escort the other VE personnel and relieve Sandia of their escort responsibility. The document referenced in the CAR provided the results of the VE operator's ESH/GET exam, which is required of anyone wishing to be an escort at Sandia. All other CCP personnel at Sandia, including the five other VE operators mentioned in the CAR, were escorted each time they were at the facility, so no site-specific training was required.

Evaluation:

The Root Cause Determination is acceptable provided that formal documentation (stipulating requirements or in this case that there are no site-specific training requirements) is submitted with the CAR closure package.

ACTIONS TO PREVENT RECURRENCE

CCP will issue Lessons Learned 2011-12 to CCP VPMs and SPMs on the separation of controls for safety from the CCP certified program.

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CAR CONTINUATION SHEET

1. CAR No: 11-044

2. Activity No: A-11-23

3. Page 3 of 3.

Evaluation:

The Actions to Prevent Recurrence are acceptable.

ACCEPTANCE

The proposed corrective action plan is acceptable. It is recommended that the CAP for CAR 11-044 be approved.

Response Evaluated By:

Cindi Castillo

Cindi Castillo
CBFO Technical Assistance Contractor

8/25/11

Date