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Department of Energy
Carlsbad Field Office
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SEP 3 2013



Mr. D.E. Gulbransen, Manager
National TRU Program Certification
Nuclear Waste Partnership, LLC
P.O. Box 2078
Carlsbad, New Mexico 88221-2078

Subject: Evaluation and Acceptance of the Revised CAP for CBFO CAR 13-051, Recertification
Audit A-13-23, LANL/CCP

Dear Mr. Gulbransen:

Enclosed are the results of the Carlsbad Field Office (CBFO) evaluation of the revised Corrective Action Plan (CAP) associated with CBFO Corrective Action Report (CAR) 13-051 resulting from Recertification Audit A-13-23 of the Los Alamos National Laboratory (LANL) Central Characterization Program (CCP). The results of the review indicate that the CAP is acceptable, as documented on the enclosed CAR Continuation Sheet. Acceptance of the CAP is contingent upon completion of all corrective action activities by September 30, 2013.

Upon completion of all corrective actions as outlined in the approved CAP, please provide notification and documentation supporting closure of this CAR so that verification activities may be performed. If you have any questions concerning this evaluation, please contact me at (575) 234-7491.

Sincerely,

Dennis S. Miehl
Senior Quality Assurance Specialist

Enclosure

cc: w/enclosure

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J. Carter, NWP/CCP	ED	G. White, CTAC	ED
J. Hoff, NWP	ED	Site Documents	ED
B. Allen, NWP/QA	ED	WIPP Operating Record	ED
S. Punchios, NWP/QA	ED	CBFO QA File	
T. Peake, EPA	ED	CBFO M&RC	

*ED denotes electronic distribution



CAR CONTINUATION SHEET

1. CAR No: 13-051

2. Activity No: A-13-23

3. Page 1 of 2

Block #16 Acceptance of Proposed Corrective Actions:

An evaluation was performed of the revised Corrective Action Plan (CAP) developed to address Carlsbad Field Office (CBFO) Corrective Action Report (CAR) 13-051. The CAP was submitted via Nuclear Waste Partnership LLC letter CP:13:01379 UFC:2300.00, dated August 19, 2013, from Mr. D. E. Gulbransen, Manager, National TRU Program Certification (NTPC), to Mr. Dennis S. Miehls, Acting Director, Office of Quality Assurance.

Italicized text, taken verbatim from the CAP, is used to reflect the correlation between the actions required by the CAR and the method used for evaluation.

REMEDIAL ACTIONS

a) The AK Expert confirmed that the batteries were non-hazardous, so the question of hazardous waste numbers (existing or needing to be added) does not apply to the CAR condition.

b) NTPC issued Standing Order CCP-SO-105 providing direction to RTR personnel that if any of the potentially-hazardous wastes in the list are found present during RTR, but are not explicitly called out in the waste stream description in AK. Then an NCR must be written to allow the AK Expert to determine whether hazardous waste numbers need to be assigned.

Evaluation:

The remedial actions are acceptable.

INVESTIGATIVE ACTIONSExtent

There have been previous reports of batteries in waste streams where the waste stream description in AK did not explicitly call out batteries (Concern 7.0 in CBFO CAR 13-034 is an example).

Impact

When these situations were investigated, the determination was either: 1) the batteries were non-hazardous (as in this case) or, 2) the appropriate hazardous waste numbers for the batteries had already been assigned to the waste in AK (as in the case of concern 7.0 in CBFO CAR 13-034). There was no technical impact in this case or in previously-reported cases.

Evaluation:

The investigative actions are commensurate with the condition adverse to quality and the actions to preclude recurrence.

ROOT CAUSE DETERMINATION

The instructions in CCP-TP-053, Section 4.4.2[H .1] were not detailed enough to ensure that RTR operators would consistently initiate NCRs when it is appropriate to do so. Not all hazardous wastes are identifiable during RTR, but there are some commonly-encountered items with characteristic shapes that should be reported via NCR if they are not called out explicitly in the AK Summary Report waste stream description: e.g., batteries, circuit boards, and fluorescent lights.

Because the instructions in CCP-TP-053 were general, they were interpreted differently by different RTR operators. The root cause for the reported condition was a less than adequate procedure.

CAR CONTINUATION SHEET

1. CAR No: 13-051

2. Activity No: A-13-23

3. Page 2 of 2

Evaluation:

A review of the root cause determination has found the conclusions to be acceptable.

ACTIONS TO PRECLUDE RECURRENCE

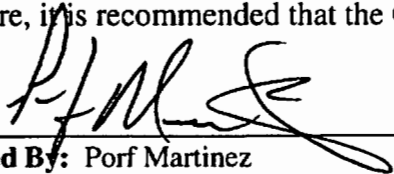
- a) *NTPC has developed a list of items that are identifiable during RTR, and which could contain hazardous constituents. NTPC is revising CCP-TP-053 and CCP-TP-508 to include this list, to ensure that RTR operators initiate an NCR whenever any of these items are reported to be present in the waste stream, and the associated AK Summary Report does not explicitly identify the items in the waste stream description.*
- b) *NTPC will brief RTR operators on the revised requirements to ensure consistent application across the NTPC scope of work.*

Evaluation:

A review of the proposed actions to preclude recurrence associated with this CAP indicate that the proposed actions are acceptable.

ACCEPTANCE

The results of the evaluation of the CAP indicate that the proposed corrective actions satisfactorily address the conditions adverse to quality documented in CAR 13-051, and provide adequate measures to preclude recurrence. Therefore, it is recommended that the CAP for CAR 13-051 be approved.



9/3/13

Evaluation Performed By: Porf Martinez

Date:

Attachment 6 – Project Office Standing Order Format

CCP Standing Order CCP-SO-105 Rev. 0

Title: Items Requiring an NCR if Found Present in the Waste during RTR But Not Called Out in the Waste Stream Description in AK

Applicability

This Standing Order is applicable to personnel performing RTR in accordance with CCP-TP-053 or CCP-TP-508.

Order

The following NOTE is being added to both of the above procedures. If any of the potentially hazardous wastes listed below are found present during RTR, but are not explicitly called out in the waste stream description in AK, then an NCR must be written to allow the AK Expert to make a determination whether hazardous waste numbers need to be assigned.

NOTE

Potential hazardous wastes identifiable by radiography include:

- Batteries
- Circuit Boards (may be contained in electrical equipment)
- Cathode Ray Tube (CRT)-based computer monitors or televisions
- Lead
- Mercury, mercury-containing equipment(e.g., barometers, switches, thermometers, thermostats)
- Light Bulbs

This order will remain in effect until the NOTE has been incorporated into the next revisions of CCP-TP-053 and CCP-TP-508.

Background

The CBFO recertification audit at LANL resulted in CAR 13-051, for batteries found in a waste stream where the AK Summary Report did not call out batteries in the waste stream description: the batteries were later determined to be non-hazardous. One action in response to the CBFO CAR is for NTPC to revise our procedures to standardize the situations where an NCR must be written, so the AK Expert can make a determination whether hazardous waste numbers need to be assigned.

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SPM (if applicable) Printed Name/Signature/Date

CCP Manager Printed Name/Signature/Date