

United States Government

Memorandum

 Carlsbad Field Office
 Carlsbad, New Mexico 88221

DATE: December 12, 2001

REPLY TO
ATTN OF: CBFO:QA:TJR:KJB 01-1839 UFC 2300

SUBJECT: CBFO Surveillance Report S-02-06, Idaho National Engineering and Environmental Laboratory

TO: Edward Ziemianski, ID

The Carlsbad Field Office (CBFO) conducted a surveillance of the Idaho National Engineering and Environmental Laboratory (INEEL) transuranic waste program on November 29, 2001. The surveillance team concluded that the system that will be used for processing headspace gas data from composited samples is acceptable. The CBFO surveillance report is attached.

There were no CBFO Corrective Action Reports, Observations or Recommendations issued as a result of the surveillance.

If you have any questions or comments concerning this report, please contact me at (505) 234-7311.

/s/ signature on file
 Thomas J. Reese
 Acting Quality Assurance Manager

Attachment

cc w/attachment:

K. Watson, CBFO	*ED
L. Chism, CBFO	
D. Winters, DNFSB	*ED
S. Monroe, EPA	*ED
M. Eagle, EPA	*ED
S. Zappe, NMED	*ED
B. Walker, EEG	*ED
Rod Taft, ID	*ED
J. Wells, ID	*ED
T. Monk, BBWI	*ED
T. Preston, BBWI	*ED
M. Gerle, WTS Operating Record	
T. Bowden, CTAC	
M. Horseman, CTAC	*ED



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Acting CBFO Quality Assurance Manager

1.0 EXECUTIVE SUMMARY

CBFO Surveillance S-02-06 was conducted to evaluate headspace gas analysis operations for compliance with the Class 2 Permit Modification Request revised September 28, 2001 and the subsequent NMED changes to the proposed text of this modification, dated November 27, 2001. The surveillance was conducted at the Idaho National Engineering and Environmental Laboratory (INEEL) on November 29, 2001. The surveillance team determined that the INEEL had addressed all of the requirements contained within the modification, and had initiated appropriate changes to PLN-190, *Quality Assurance Project Plan*, PLN-600, *Quality Assurance Plan* and applicable implementing procedures. The surveillance team also determined that the system that will be used for processing headspace gas data from composited samples is acceptable.

The surveillance team did not identify any conditions adverse to quality that required the issuance of a Corrective Action Report (CAR). No Observations nor Recommendations were issued as a result of this surveillance.

2.0 SCOPE

CBFO Surveillance S-02-06 was conducted to evaluate the adequacy implementation, and effectiveness of the INEEL Transuranic Waste Characterization Program relating to headspace gas analysis operations for compliance with the Class 2 Permit Modification Request, revised September 28, 2001 and the NMED changes to the proposed text of this modification on November 27, 2001.

3.0 SURVEILLANCE TEAM, INSPECTOR AND OBSERVER

Amelia I. Arceo
Dorothy Gill

Surveillance Team Leader, CTAC
Technical Specialist, CTAC

4.0 SURVEILLANCE PARTICIPANTS

Personnel contacted during the course of the surveillance are identified in the following table:

PERSONNEL CONTACTED				
NAME	TITLE/ORG	PRE SURVEILLANCE MEETING	CONTACTED DURING SURVEILLANCE	POST SURVEILLANCE MEETING
Crowder, Catherine	ECL Supervisor, BBWI	X	X	X
Crisp, Dan E.	Site Project Manager Liason, BBWI	X		X

PERSONNEL CONTACTED				
NAME	TITLE/ORG	PRE SURVEILLANCE MEETING	CONTACTED DURING SURVEILLANCE	POST SURVEILLANCE MEETING
	Liason, BBWI			
Einerson, Jeff	Statistician, BBWI		X	
Krivanek, Ken	Contractor, GTI	X	X	X
Monk, Thomas	Site Project Manager, BBWI			X
Sailer, Shelly	ALD QA Officer, BBWI	X	X	X
Strum, Mike	WWIS Data Administrator, WTS		X	

5.0 SUMMARY OF SURVEILLANCE RESULTS

5.1 Surveillance Activities

Details of surveillance activities, along with the specific objective evidence reviewed and the results of the reviews, are contained within the surveillance checklist. The checklist is maintained as a QA record. No conditions adverse to quality requiring the issuance of a CAR were identified. No Observations nor Recommendations were issued as a result of this surveillance.

5.1.1 Composite Headspace Gas Data and Compositing up to 20 Samples

The surveillance team evaluated the system for processing headspace gas data from composited sample at the Environmental Chemistry Laboratory (ECL) as specified in the Class 2 Permit Modification Request and the subsequent NMED changes to the Modification Request. The NMED changes were identified in the Table B6-4 Headspace Gas Checklist Items (Nos. 51a, 220D, 222a and 222b) of the Permit Modification Request. The following are the results:

Item 51a. The surveillance team verified that if the container was part of a composite headspace gas sample, the analytical results from the composite sample are assigned as the container headspace gas data in the WWIS. Two composited headspace gas samples (01253005C29) and (01253005C19) from an Analytical Batch ECL001461M were reviewed and the surveillance team verified that the analytical data were transferred into the WWIS.

Item 220D The surveillance team verified that composited samples are treated as one sample for the purposes of calculating completeness. The SPO Level 2 Review Checklist for Field Headspace Gas Sample Analysis for Batch ECL01461M, specifies that "A composited sample is treated as one sample for the purpose of completeness."

Item 222a The surveillance team verified that the required criteria for recognition and reporting of TICs are included in the procedure for GC/MS methods for headspace gas sampling. The ACMM-9930, Revision 6, *GC/MS MFC for VOCs in Gas*, Section 9.3.1 provided for the identification and reporting of TICs.

Item 222b The surveillance team verified that procedure ACMM-9930, Rev. 6, Section 9.3.1, requires that TICs be reported as part of the analytical batch data reports for GC/MS methods in accordance with the required minimum criteria.

5.1.2 Nonconformance Report Number 25837

The surveillance team reviewed NCR 25837, generated to document the drums not in compliance with the WIPP WAP when the Class I compositing modification was rejected by NMED on September 24, 2001. The NCR identified and isolated 1864 drums affected by the withdrawal of the Class 1 modification, in the WWIS. The drums are frozen in the WWIS; hence, they can not be processed until the NCR is closed. A method for re-evaluation of the data from these drums, in accordance with the Class 2 modification requirements, has been identified in the draft Corrective Action Plan for the NCR.

6.0 CORRECTIVE ACTIONS, OBSERVATIONS, AND RECOMMENDATIONS

The surveillance team did not identify any conditions adverse to quality that required the issuance of a Corrective Action Report (CAR). No Observations nor Recommendations were issued as a result of this surveillance.

7.0 ATTACHMENTS

Attachments: None