

United States Government

Memorandum

 Carlsbad Field Office
 Carlsbad, New Mexico 88221

DATE: December 12, 2001

REPLY TO
ATTN OF: CBFO:QA:TJR:KJB 01-1840 UFC 2300

SUBJECT: CBFO Surveillance Report S-02-07, Rocky Flats Environmental Technology Site

TO: John Schneider, Assistant Manager for Environment and Compliance, RFFO

The Carlsbad Field Office (CBFO) conducted a surveillance of the Rocky Flats Technology Site (RFETS) transuranic waste program on November 28, 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
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J. Jeffries, RFFO	*ED
L. Xuan, RFFO	*ED
G. O'Leary, RFETS	*ED
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**U.S. DEPARTMENT OF ENERGY
CARLSBAD FIELD OFFICE**

**SURVEILLANCE REPORT
OF THE
ROCKY FLATS ENVIRONMENTAL
TECHNOLOGY SITE
(RFETS)**

Denver, Colorado

SURVEILLANCE NUMBER S-02-07

NOVEMBER 28, 2001

TRANSURANIC WASTE CHARACTERIZATION PROGRAM



Prepared by: _____/s/ *signature on file*
James R. Schuetz
Surveillance Team Leader

Date: 12-11-01

Approved for Issue by: ___/s/ *signature on file*___
Thomas J. Reese
Acting CBFO Quality Assurance Manager

Date: 12-12-01

1.0 EXECUTIVE SUMMARY

CBFO Surveillance S-02-07 was conducted to evaluate the process of reducing data from composited headspace gas analysis results at the Rocky Flats Environmental Technology Site (RFETS). The surveillance was performed to assure that the RFETS process is in accordance with the NMED response to the compositing headspace gas analysis requirements. The surveillance was conducted at RFETS on November 28, 2001. The surveillance team determined that the process for data reduction is acceptable and that the equipment being used has been previously certified.

The surveillance team did not identify any conditions adverse to quality that required the issuance of a Corrective Action Report (CAR). There were no issues corrected during the audit and no Observations or Recommendations were issued as a result of the surveillance.

2.0 SCOPE

CBFO Surveillance S-02-07 was conducted to evaluate the adequacy, implementation, and effectiveness of the RFETS Transuranic Waste Characterization Program relating to the process of evaluating data from composited headspace gas analysis, used to characterize transuranic waste at RFETS.

3.0 SURVEILLANCE TEAM, INSPECTOR AND OBSERVER

James R. Schuetz	Surveillance Team Leader, CTAC
B. J. Verret	Technical Specialist, CTAC

4.0 SURVEILLANCE PARTICIPANTS

The following table identifies those personnel contacted during the course of the surveillance.

PERSONNEL CONTACTED			
NAME	TITLE/ORG	CONTACTED DURING SURVEILLANCE	EVALUATION AREA
Kristy Henderson	Radiological Laboratory QA	X	HSG Compositing
J. J. (Joe) Reynolds	Radiological Laboratory QA	X	HSG Compositing
Ron D. Thiel	Senior Principal Chemist	X	HSG Compositing
Mike E. Harris	Chemist	X	HSG Compositing

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 checklists. The checklists are maintained as QA records. No conditions adverse to quality, requiring the issuance of a CAR were identified. Also, there were no deficiencies corrected during the surveillance and no Observations or Recommendations issued.

5.1.1 Data Reduction for Headspace Gas Composited Samples

The surveillance team evaluated the process and software being used to analyze the analysis results of headspace gas composited samples. The surveillance team evaluated the maintenance, configuration control, verification and validation, computer security, and access controls for software used to support analysis of Gas Samples by a Gas Chromatograph / Mass Spectrometer (GC/MS) System. The review of software management practices determined that the processes used for software inventory, change control, computer security, verification and validation, installation and checkout, and access control practices were adequate, implemented, and effective for the analysis and data software. Inspection of the GC/MS software determined that verification methods were comprehensive and demonstrated that correct results can be obtained over the range of interest.

Interviews with the RFETS Laboratory personnel, indicated that RFETS will perform peak quantitation using standard Commercial-Off-The-Shelf (COTS) software supplied by the manufacturer of the laboratory equipment. Based on a demonstration by RFETS personnel, the surveillance team determined that the acceptance criteria identified in the Permit Modification can be entered manually into the computer software. Procedures will be revised to provide the manually entered data. The modified record batch data report will include the modified acceptance criteria.

The surveillance team reviewed hand calculations of data to validate the results generated from the software for the range of operation of the GC/MS equipment. The results of the hand calculations indicate the software can accurately perform the data analysis. The surveillance team determined that the software does have the ability to perform the functions that are necessary to perform the re-evaluation to determine that the permit requirements have been met.

Re-analysis of existing data will be performed for equipment that has been evaluated during previous certification audits. The surveillance team also verified the acceptability of computer hardware platforms that will be used to run software for the re-analysis of the composited data.

5.1.2 Original Batch Data Reports and Test Data

The surveillance team verified that existing batch data reports identify the number and identification of the drums included in the composited headspace gas sample. The Surveillance team verified that previously generated raw data is available on computer storage media or on networked computer hardware and that existing procedures properly detail the methods for the identification, loading, reporting, and verification of the data to ensure proper re-evaluation of the data.

5.1.3 Review of Modified Batch Data Reports

The surveillance team verified that existing procedures are adequate to describe the modification, validation, and re-submittal of modified batch data reports.

5.1.4 Revision of Procedures and Personnel Training

Based on interviews with RFETS Laboratory Personnel, the surveillance team determined that the scope and content of procedural revisions are adequate to address the re-evaluation of composited headspace gas data. However, the procedures were in draft form at the time of the surveillance and had not been reviewed and approved for issue. Personnel that will be performing the re-analysis have not received training to the revised procedures. These activities need to be completed prior to performing the data re-evaluation.

5.1.5 Non-conformance Reports for Drums Requiring Re-analysis

The surveillance team reviewed RFETS non-conformance reports that identify drums that were originally sampled and composited for headspace gas analysis and that now require re-analysis. The surveillance team determined that the identity and impact of drums requiring re-analysis was adequately evaluated. However, at the time of the surveillance, the Non-conformance Reports (NCRs) did not include a description of the method of re-analysis. Interviews with the RFETS Laboratory QA and SQA personnel indicated that the disposition and detail of the re-analysis will be added to the NCRs when the procedures are approved. This needs to be done prior to performing the data re-evaluation.

6.0 CORRECTIVE ACTIONS, OBSERVATIONS, AND RECOMMENDATIONS

The surveillance team identified no deficiencies during the surveillance that required the issuance of Corrective Action Reports (CARs). There were no issues corrected during the audit and no Observations or Recommendations were issued as a result of the surveillance.

7.0 ATTACHMENTS

None