



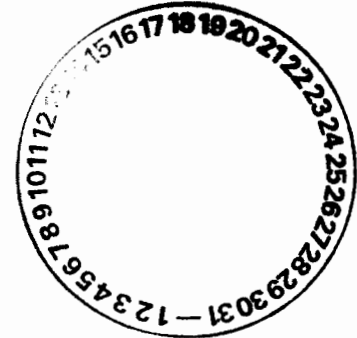
ENVIRONMENTAL EVALUATION GROUP



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February 15, 2002

Dr. Inés Triay, Manager
Carlsbad Field Office
U. S. Department of Energy
P. O. Box 3090
Carlsbad, NM 88221-3090

Dear Dr. Triay:

Attached is the EEG observer report for the Performance Demonstration Program (PDP) audit conducted January 21-31, 2002. The PDP appears to continue its history as a well-run and useful independent assessment of waste characterization capacities.

Sincerely,

Matthew Silva
Director

BAW:ss
Enclosure

cc: Steve Zappe, NMED
Scott Monroe, EPA

020227





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MEMORANDUM

DATE: February 12, 2002
TO: Matthew Silva, Director
FROM: Ben Walker, QA Specialist *Baw*
SUBJECT: CBFO Audit of the PDP, January 21 to January 31, 2002

I observed a portion of the CBFO's audit of the Performance Demonstration Program (PDP) on January 29, 2002. This audit began the previous week with a technical review of the production of samples for the program; this portion of the audit was to cover management of the program by the CBFO as well as the training and records portion of the program. Two auditors performed the first week's auditing; one of these (the audit team leader) was to complete the auditing activities this week. Due to a changeover of key personnel, the non-destructive assay (NDA) portion of the PDP was dropped as a major focus of the audit.

Two concerns had been raised prior to the portion of the audit I observed, the principal one relating to the adequacy of the *Performance Demonstration Program Management Plan* (DOE/CBFO-01-3107, revision 0). The document is being revised, and the issue may become a corrected-during-the-audit (CDA). There were no concerns found with the preparation and handling of headspace gas or solidified waste surrogate samples.

There were also no concerns developed during the management interviews that I observed. One of the problems with the current PDP Management Plan is that the "CBFO-NTWCT Waste Characterization/Certification Manager" specified in the Plan is not the CBFO person actually performing the duties specified in the Plan. However, it was clear to me that the CBFO person performing these duties—a former waste characterization manager—was cognizant of the use of the program, highly knowledgeable in its operation, and in control of the process. The Management Plan also specifies a "Contractor PDP Manager" and separate contractor coordinators for the three areas the PDP currently covers (headspace gas, homogeneous solids sampling, and NDA). Currently, the contractor PDP manager is also the headspace gas coordinator. This individual also appeared to have the requisite knowledge and abilities for the tasks he was performing.

Memo to Matthew Silva

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I did not observe the remaining portions of the audit (assessment of procurement, training records, and records-keeping). The lead auditor has informed me by telephone that the only concern during this portion was a missing signature on one document.

The last audit of the PDP program was several years ago. The lack of any indication of significant problems during this audit indicates that the program management has been assiduous in understanding and implementing the CBFO quality assurance program.

The PDP funding was apparently reduced by over 20% for the current year. Due in part to this budget reduction, the person who developed the highly-regarded NDA PDP has been redesignated as an advisor to the program, and a new NDA coordinator has been named. An assessment of the NDA PDP will apparently take place later this year, after the new coordinator is fully integrated into the program.

BAW:ss