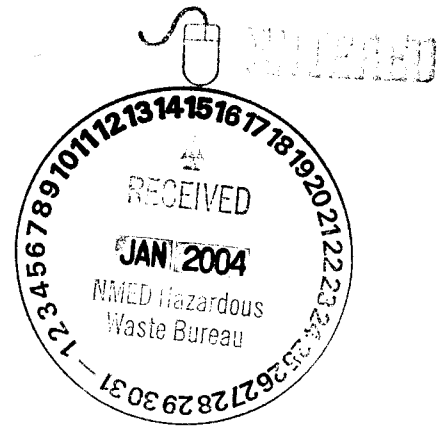




Department of Energy
Carlsbad Field Office
P. O. Box 3090
Carlsbad, New Mexico 88221
January 14, 2004



Mr. Steve Zappe, WIPP Project Leader
Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Bldg. 1
Santa Fe, NM 87505-6303

Subject: Transmittal of the Final Audit Report for the Nevada Test Site (A-04-04)

Dear Mr. Zappe:

This letter transmits the Nevada Test Site (NTS), Central Characterization Project (CCP) Audit Report for the processes performed to characterize and certify waste as required by Section II.C.2.c of the Waste Isolation Pilot Plant (WIPP) Hazardous Waste Facility Permit. The report contains the results of the audit performed. The audit was conducted October 6-9, 2003.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision according to a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.

Should you have any questions concerning this audit report, please contact the CBFO Quality Assurance Manager, Ava L. Holland, at (505) 234-7423.

Sincerely,

Mr. Lloyd Piper
Acting Manager

Enclosure



Mr. Steve Zappe

-2-

January 14, 2004

cc: w/o enclosure

A. Holland, CBFO	*ED
D. Miehl, CBFO	*ED
M. Navarrete, CBFO	*ED
R. Knerr, CBFO	*ED
K. Watson, CBFO	*ED
A. Colarusso, DOE/NV	*ED
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J. Kieling, NMED	*ED
S. Martin, NMED	*ED
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B. Walker, EEG	*ED
S. Warren, WTS	*ED
A. J. Fisher, WTS	*ED
T. Hedahl, WTS	*ED
P. Rodriguez, CTAC	*ED
S. Harrison, CTAC	*ED
L. Greene, WRES	*ED

cc: w/enclosure

C. Walker, Techlaw
K. Dunbar, WRES
CBFO QA File
CBFO M&RC

U.S. DEPARTMENT OF ENERGY
CARLSBAD FIELD OFFICE

FINAL AUDIT REPORT
OF THE
NEVADA TEST SITE
UTILIZING THE
CENTRAL CHARACTERIZATION PROJECT

AUDIT NUMBER A-04-04

October 6 – 9, 2003

FINAL AUDIT REPORT OF WASTE CHARACTERIZATION IN
ACCORDANCE WITH THE HAZARDOUS WASTE FACILITY PERMIT



Prepared by: *Pete V. Rodriguez*
Pete V. Rodriguez, CTAC
Audit Team Leader

Date: *1/7/04*

Approved by: *Ava L. Holland*
Ava L. Holland, CBFO
Quality Assurance Manager

Date: *1/14/04*

1.0 EXECUTIVE SUMMARY

Carlsbad Field Office (CBFO) Audit A-04-04 was conducted to re-evaluate the adequacy, implementation, and effectiveness of the Nevada Test Site/Central Characterization Program (NTS/CCP). This re-certification audit was conducted on October 6 – 9, 2003, in Carlsbad, New Mexico, and re-evaluated the CCP transuranic (TRU) waste characterization and certification activities related to Summary Category S5000 contact-handled debris waste streams. The audit team assessed the adequacy, implementation, and effectiveness of both technical and quality assurance (QA) activities.

In the absence of physical characterization equipment, the audit scope and methodology consisted of an extensive review of the batch data reports (BDRs) and other documentation associated with each of the characterization techniques. Evaluation of completed BDRs and associated documentation provided objective evidence of proper implementation of the various characterization processes. This assessment confirmed the CCP programmatic interfaces established with Bechtel Nevada (BN), the CCP administrative controls needed to manage characterization activities, and the characterization processes and activities previously conducted at the NTS. The activities evaluated included characterization with a mobile real-time radiography (RTR) system, NTS visual examination (VE) segregation, repackaging operations conducted in the NTS Waste Examination Facility (WEF), and mobile single-sample manifold headspace gas (HSG) sampling and analysis equipment. In addition, the process for developing the acceptable knowledge (AK) documentation was evaluated.

The audit team concluded that the CCP technical and QA procedures were adequate relative to the flow-down of requirements from the CBFO Quality Assurance Program Document (QAPD), and the Waste Analysis Plan (WAP) of the Waste Isolation Pilot Plant (WIPP) Hazardous Waste Facility Permit (HWFP). The audit team also concluded that the assessed activities were being satisfactorily implemented in accordance with the CCP Quality Assurance Project Plan (QAPjP) and the implementing procedures. The established technical processes and the QA program and procedures were also determined to be satisfactorily implemented and effective.

The audit team identified one condition adverse to quality (CAQ) resulting in the issuance of one CBFO corrective action report (CAR). The CAR identified adverse conditions concerning the use of an on-line control sample (OCS) gas cylinder beyond its expiration date. This CAR was deemed to be non-significant because waste has not been shipped, and the technical quality of the data was not impacted.

Four isolated deficiencies requiring only remedial corrective actions were corrected during the audit (CDA). No Observations resulted from the audit, and one Recommendation is being offered for management consideration. The CAR, CDAs and Recommendation are described in Sections 6 and 7.

It should be noted that prior to any future and acceptable characterization by the NTS/CCP, a CBFO surveillance would be scheduled and performed to verify that the equipment, processes, and procedures remain as currently certified and approved for S5000 debris waste.

2.0 SCOPE AND PURPOSE

2.1 Scope

CBFO Audit A-04-04 was conducted to re-evaluate the adequacy, implementation, and effectiveness of the CCP QA Program and technical processes used to perform TRU waste characterization activities for retrievably stored, contact-handled debris waste in accordance with the requirements contained in the WIPP HWFP. Compliance was demonstrated and documented by completing the attached B6 checklist for the applicable NTS/CCP activities.

The following elements were evaluated in accordance with the CBFO QAPD:

- Organization/QA Program Implementation
- Personnel Qualification and Training
- Grading Program
- Documents and Records
- Procurement
- Control of Measuring and Test Equipment
- Nonconformance/Corrective Action
- Audits and Assessments
- Sample Control
- Software Quality Assurance

The following CBFO technical characterization elements were evaluated in accordance with the WAP:

- Data Verification and Validation (V&V)
- AK
- Nondestructive Examination (NDE) (RTR)
- HSG Sampling and Analysis
- Sampling Design
- Performance Demonstration Program (PDP)
- Waste Stream Profile Forms
- WIPP Waste Information System (WWIS) Data Entry

The evaluation of the NTS/CCP Transuranic (TRU) Waste Characterization Program was based on current revisions of the following documents:

- *Waste Isolation Pilot Plant Hazardous Waste Facility Permit*
- *Quality Assurance Program Document (QAPD), DOE-CBFO-94-1012*

- *CCP Transuranic Waste Quality Assurance Characterization Project Plan (QAPjP)*, CCP-PO-001
- *CCP Transuranic Waste Certification Plan*, CCP-PO-002
- Related NTS/CCP QA and technical implementing procedures (see Attachment 4)

2.2 PURPOSE

Audit A-04-04 was conducted to assess and re-evaluate whether the NTS/CCP retrievably stored waste characterization activities continue to comply with the WIPP HWFP requirements.

3.0 AUDIT TEAM AND OBSERVERS

AUDITORS/TECHNICAL SPECIALISTS

Denis Miehls	CBFO QA Representative
Martin Navarrete	CBFO QA Representative
Pete Rodriguez	Audit Team Leader, CBFO Technical Assistance Contractor (CTAC)
Tammy Bowden	Auditor, CTAC
Prissy Dugger	Auditor, CTAC
Norm Frank,	Auditor, CTAC
Porf Martinez	Auditor, CTAC
Jack Walsh	Auditor, CTAC
Chet Wright	Auditor, CTAC
Dick Blauvelt	Technical Specialist, CTAC
Karen Gaydosh	Technical Specialist, CTAC
B.J. Verret	Technical Specialist, CTAC

OBSERVERS

Ben Walker	Environmental Evaluation Group (EEG)
Steve Holmes	New Mexico Environment Department (NMED) Observer
Kevin Krause	NMED Observer
Bob Thielke	NMED Observer/EPA Inspector/Tech Law

4.0 AUDIT PARTICIPANTS

A pre-audit conference was held in the auditorium of the Skeen-Whitlock Building in Carlsbad, New Mexico, on October 6, 2003. Daily management briefings were held with NTS/CCP management to discuss the progress of the audit and potential deficiencies. The audit concluded with a post-audit conference held in the Skeen-Whitlock Building on October 9, 2003. A list of NTS/CCP personnel contacted during the course of the audit is included in Attachment 1.

5.0 SUMMARY OF AUDIT RESULTS

5.1 Program Adequacy and Implementation

Audit 04-04 was performed to assess the continued ability of the NTS/CCP to characterize S5000 retrievably stored, contact-handled debris wastes at the NTS.

The characterization methods assessed were single-manifold HSG sampling and analysis, AK, RTR, and the NTS VE, segregation, and repackaging operations conducted in the NTS WEF. In addition, data review and validation were assessed, as well as the use of those data to: 1) perform data quality objective (DQO) reconciliation, 2) prepare a Waste Stream Profile Form (WSPF), and 3) perform data entry to the WWIS.

The audit team concluded that the applicable NTS/CCP activities, as described in the associated implementing procedures, satisfactorily meet the requirements contained in the HWFP. The deficiency identified in Section 6.1 has been satisfactorily resolved and closed. Also, while evaluating the QA program elements, the audit team identified the following three concerns: CDA 1 was related to a training and qualification appointment letter; CDA 3 involved conflicts in the *Software Code Management: Code Information Summary*; and CDA 4 concerned an incomplete records inventory and disposition schedule (RIDS) for an NTS records listing. These concerns were determined to be isolated, requiring remedial action only, and were satisfactorily corrected during the audit (CDA). Details of audit activities, including specific objective evidence reviewed, are described below and in the attached B6 checklist, which identifies the NTS/CCP program documents and procedures that ensure compliance with WAP requirements. Attachment 3 contains the objective evidence that was reviewed during the audit.

5.2 Technical Activities

5.2.1 Table B6-1 WAP Checklist

The B6-1 WAP checklist addresses program requirements from an overall management perspective. It documents the verification that the waste characterization strategy as defined in the WAP is implemented by using controlled procedures. This audit assessed the continued ability of the NTS/CCP to characterize Summary Category Group S5000 debris waste streams. Objective evidence was selected and reviewed to evaluate the implementation of the associated characterization activities. This objective evidence included BDRs, sampling records, and training documentation for NTS/CCP personnel associated with gas sampling and analysis, RTR, VE, and WWIS data entry. Each characterization process involves:

- Collecting raw data
- Collecting quality assurance/quality control (QA/QC) samples or information
- Reducing the data to a useable format, including a standard report
- Review of the report by the data generation facility and the site project office
- Comparing the data against program data quality objectives (DQOs)

- Reporting the final waste characterization information to the WIPP

The flow of data from point of generation to incorporation on the WSPF for each characterization technique was reviewed to ensure that all applicable requirements were included in the operating procedures. Specific procedures audited and the objective evidence reviewed are described in more detail in the following sections.

The NTS/CCP demonstrated compliance with the characterization requirements of the WAP through documentation that demonstrated proper implementation of the various characterization processes and activities. NTS/CCP provided combined sampling and analysis BDRs NT120202B and NT121902A (containing sampling and gas analytical batch information), radiography BDRs NTRTR0045, NTRTR0049, NTRTR0044, NTRTR0048, and NTRTR0052, and VE BDRs NT-VE-00008, NT-VE-00015, and NT-VE-00011. The project-level data V&V process was evaluated by reviewing the following BDRs (copies of all referenced BDRs are included in Attachment 3):

- HSG BDRs NT051602A, NT121102A, and NT120302B
- RTR BDRs NTS-0001, NTRTR0043, NTRTR0050
- VE BDRs NT-VE-00006, NT-VE-00016, and NT-VE-00017

The AK and the auditable records were reviewed in detail for a contact-handled TRU waste stream (Summary Category Group S5000). The AK record was reviewed to demonstrate that the required information was present and correctly interpreted. The BDRs cited above were used to demonstrate that the required information was present and correctly interpreted, as well as to demonstrate confirmation of AK, reconcile DQOs, prepare a WSPF, and transmit data to WIPP using the WWIS.

A WSPF and related summarized characterization information were reviewed to establish the objective evidence for reporting waste characterization information to WIPP. The form was completed using information from the various characterization processes. The WSPF was reviewed and approved by the CBFO when the waste stream had been fully characterized, and the site was approved to ship waste, however, no shipments have been made to date.

5.2.2 Table B6-2 Solids and Soils/Gravel Sampling Checklist

Solids and soils/gravel waste streams were not included in the audit scope; therefore, no Summary Category Groups S3000 or S4000 waste will be characterized for disposal at WIPP until NTS/CCP procedures and processes have been audited and accepted by CBFO and a final audit report for those processes has been approved by the NMED.

5.2.3 Table B6-3 Acceptable Knowledge Checklist

This audit was performed to assess the continued ability of NTS/CCP to characterize Summary Category Group S5000 retrievably stored, contact-handled debris waste streams. Items on the AK checklist are intended to ensure that the NTS/CCP has an AK process in place to:

- Train personnel in data collection requirements
- Assemble collected data into a coherent narrative detailing the waste generation and constituents
- Segregate the waste into like waste streams
- Perform Resource Conservation and Recovery Act (RCRA) characterization for those waste streams
- Confirm those characterizations using sampling and analysis
- Provide an auditable set of records to support the characterization

The AK process was evaluated by reviewing AK summary reports, source documents, and other applicable documentation related to CH TRU waste that was generated at the Lawrence Livermore National Laboratory (LLNL) during nuclear weapons fabrication and materials research. The waste streams summarized include a current inventory of 1702 containers of TRU waste. The waste was originally generated in LLNL Building 251 (Heavy Element Facility), Building 332 (Plutonium Facility), and Building 419 (Hazardous Waste Management Facility). Specific AK documents include the AK Summary Report, NTS LLNL Waste, 1/6/03, and AK Confirmation Checklists and Accuracy Report, NTLNLL-S5400-332.

The AK checklist was completed, in part, by reviewing the documents cited above. Additional documentation supporting the AK summary documents and AK source document review summaries is contained in Attachment 3 to support the entries in Table B6-3.

The AK process includes provisions to identify information that conflicts with what is expected in a waste stream (confirmation processes) and a method by which these conflicts can be resolved. The audit team reviewed examples of the resolution of discrepancies identified in the AK record (AK Source Document Discrepancy Resolution) and examined the process for dealing with prohibited items in the debris waste stream. The discrepancy resolution procedure is CCP-QP-005, *CCP TRU Nonconforming Item Reporting and Control*.

The procedures used by the site to assemble, evaluate, document, and reconcile sampling and analysis results include CCP-TP-001, *CCP Project Level Data Validation and Verification*; CCP-TP-002, *CCP Reconciliation of DQOs and Reporting Characterization Data*; CCP-TP-003, *CCP Sampling Design and Data Analysis for RCRA Characterization*; and CCP-TP-005, *CCP Acceptable Knowledge Documentation*. These procedures were reviewed for adequacy, and their implementation was assessed during the audit. The AK requirements include procedure content and specific requirements for retrievably stored waste, and ensure that the AK summary includes all mandatory information required by the WAP.

Reports and records used to document the basis of NTS/CCP AK were evaluated; copies of pages used for objective evidence can be found in Attachment 3. The reports were found to be satisfactory and the records properly maintained as QA records.

Attachment 3 contains a list of AK documentation reviewed in support of Procedure CCP-TP-005.

The confirmatory test process was also reviewed and BDRs were examined for three debris drums that had been processed through the complete required confirmatory testing, including project level V&V. The audit team examined the CBFO-approved WSPF, the Characterization Information Summary (CIS), and the DQO checklists. Also reviewed were the processes for UCL₉₀ determination, NDE/VE comparisons, and determination of lots.

The audit team identified one concern related to discrepancies in an AK summary report. This concern was determined to be isolated, requiring remedial action only, and was satisfactorily corrected during the audit (CDA 2). This CDA is described in Section 6.2 in further detail.

The audit team determined that the AK procedure, confirmation processes for the reconciliation of DQOs, and the sample design and data analysis processes were adequate with respect to WAP requirements, satisfactorily implemented, and effective in producing the requisite AK information.

5.2.4 Table B6-4 Headspace Gas Checklist

This audit was performed to assess the continued ability of the NTS/CCP to characterize Summary Category Group S5000 retrievably stored debris waste streams. The audit team evaluated the sampling and analysis of retrievably stored debris waste streams and the sampling and analysis procedures and operations for a single-sample manifold system.

The manifold system automatically penetrates the drum using a specially designed, self-drilling, self-tapping hollow core filter vent. The filter or plug is installed into a socket inside the glovebox power head prior to drum processing. Samples are collected when the power head assembly bores through the drum lid and lowers the filter to sample depth. At sample depth, a flow path is created from inside the plastic drum liner and the annular space, through a hollow, fluted filter vent stem, and into the seal housing inlet port of the sample manifold. The system uses gas chromatography/mass spectrometry (GC/MS) (to determine hazardous constituents required by the WAP), photo-ionization detector (PID) (to determine cleanliness), purge gas (pure nitrogen), and calibrated pressure/vacuum gauges. Proper sample collection is verified by collecting QC samples and evaluating the data against specific quality assurance objectives (QAOs). Sampling QAOs are assessed after the QC samples have been analyzed, and are documented in the analytical BDRs.

The NTS/CCP procedures governing on-line sampling and analysis activities and data review and validation include:

- CCP-TP-007, *CCP Single Sample Manifold Headspace Gas Sampling and Analysis Procedure*

- CCP-TP-009, *CCP Single Sample Manifold Data Handling Procedure*
- CCP-TP-011, *CCP Logbooks and Notebooks*
- CCP-TP-029, *CCP Single-Sample Manifold Headspace Gas Sampling and Analysis Methods and Equipment Calibration*
- CCP-TP-032, *CCP Single Sample Manifold Data Validation Procedure*
- CCP-TP-056, *CCP HSG Performance Demonstration Plan*

HSG sampling and analysis activities were evaluated and verified through review and examination of the documents and records generated as a result of procedure implementation. BDRs NT120202B and NT121902A were reviewed to evaluate sampling and analysis results against WAP requirements. Documentation specific to these activities (i.e., calibration records, maintenance logbooks, PDP results, and instrument logbooks), were reviewed to ensure that the mobile operations met QA requirements, as specified in the WAP. Copies of the applicable documentation reviewed are included in the BDRs. Personnel training records were also reviewed for adequacy and compliance to WAP requirements.

The audit team completed the B6-4 checklist while assessing implementation of the applicable procedures. Sampling and analysis operations were verified through review of documentation to ensure conformance to requirements.

The audit team identified one deficiency wherein an OCS gas cylinder was used beyond its expiration date. This CAQ was determined to be non-significant and has been satisfactorily resolved and closed (CAR 04-003, Section 6.1).

A recommendation for all certificates of analysis to be kept by the CCP records organization was offered for management consideration (Recommendation 1, Section 7.2).

Overall, the audit team concluded that the HSG sampling and analysis operations and processes at NTS/CCP were adequate with respect to WAP requirements, satisfactorily implemented, and effective.

5.2.5 Table B6-5 Radiography Checklist

This audit was performed to assess the continued ability of the NTS/CCP to characterize Summary Category Group S5000 retrievably stored debris waste streams. The NTS/CCP radiography operations were performed using a real-time system previously located in a mobile RTR trailer at Area 5 at the NTS. The following NTS/CCP procedures governing the mobile RTR operations were evaluated:

- CCP-TP-045, *CCP RTR #5 Radiographic Inspection Operating Procedure*
- CCP-TP-028, *CCP Radiographic Test and Training Drum Requirements*

The NTS/CCP RTR operations were evaluated and verified through review and examination of the documents and records generated as a result of procedure implementation, and completion of the Table B6-5 radiography checklist. The following

BDRs and associated videotapes were reviewed and evaluated to ensure that the following specific WAP requirements were met: NTRTR0045, NTRTR0049, NTRTR0044, NTRTR0048, and NTRTR0052. Training course material and the RTR test drums were also reviewed for adequacy and compliance to WAP requirements.

The audit team concluded that the NTS/CCP RTR procedures and processes were adequate, satisfactorily implemented, and effective.

5.2.6 Table B6-6 VE Checklist

This audit was performed to assess the continued ability of the NTS/CCP VE process to characterize Summary Category Group S5000 retrievably stored debris waste streams. The NTS VE process was evaluated to determine the effectiveness of VE as a confirmation of the RTR process and as a characterization method that can be used in lieu of RTR. VE performed as a confirmation of RTR or in lieu of RTR is recorded on audio/videotape and the results are documented on standard forms in accordance with Procedure CCP-TP-003, *CCP Sampling Design and Data Analysis for RCRA Characterization*, and CCP-TP-062, *CCP TRU Waste Visual Examination, Segregation and Repackaging*.

The NTS/CCP VE activities were evaluated and verified through review and examination of the documents and records generated as a result of procedure implementation, and completion of the Table B6-6 VE checklist. The following BDRs and associated videotape records were examined and evaluated to ensure that the following specific WAP requirements were met: NT-VE-00008, NT-VE-00015, and NT-VE-00011.

The training course content for operators and VE experts was reviewed to verify that all WAP requirements were included. Training files were reviewed for VE experts and operators to verify that individuals responsible for performing the visual examination of drums had been properly trained and qualified.

The audit team determined that the VE process used for S5000 waste was adequate, satisfactorily implemented, and effective.

5.3 General

Results of Previous Audits

The Observations and CARs resulting from the previous NTS/CCP certification audit A-02-15 were examined and it was determined that the conditions identified in the audits had been corrected.

Changes in Program or Operation

The HWFP portions of the audit were performed in accordance with the latest B6 checklists, which incorporate all the Class 1, Class 2, and Class 3 modifications to the

HWFP. NTS/CCP has not implemented any changes in the program or operation, and the equipment was demobilized from the NTS in early calendar 2003 and redeployed to other sites.

New Programs or Activities Being Implemented

No new programs or activities have been implemented since that last certification audit.

Changes in Key Personnel

No changes in NTS/CCP key personnel have occurred since the last certification audit. NTS/CCP has certified additional personnel as alternates for the key positions.

6.0 SUMMARY OF DEFICIENCIES

6.1 Corrective Action Reports

During the audit, the audit team may identify conditions adverse to quality (CAQ) and document such conditions on corrective action reports (CARs).

Condition Adverse to Quality (CAQ) – Term used in reference to failures, malfunctions, deficiencies, defective items, and nonconformances.

Significant Condition Adverse to Quality – A condition which, if uncorrected, could have a serious effect on safety, operability, waste confinement, TRU waste site certification, compliance demonstration, or the effective implementation of the QA program.

One WAP-related deficiency, requiring the issuance of one CAR, was identified during the audit. The CAR describes an OCS gas cylinder ALM 067164 (certified gas standard) that was used beyond its expiration date as shown on the certificate of analysis. This CAR was deemed to be non-significant because the waste has not been shipped, and the technical quality of the data was not impacted. This CAQ has been corrected and the CAR has been closed (CBFO CAR 04-003).

6.2 Deficiencies Corrected During the Audit (CDAs)

During the audit, the audit team may identify CAQs. The audit team members and the Audit Team Leader (ATL) evaluate the CAQs to determine if they are significant using the following definitions. Once a determination is made that the CAQ is not significant, the audit team members, in conjunction with the ATL, determine if the CAQ is an isolated case requiring only remedial action and therefore can be corrected during the audit (CDA). Upon determination that the CAQ is isolated, the audit team members, in conjunction with the ATL, evaluate/verify any objective evidence/actions submitted or taken by the audited organization and determine if the condition was corrected in acceptable manner. Once it has been determined that the CAQ has been corrected, the ATL categorizes the condition as a CDA.

Condition Adverse to Quality (CAQ) – Term used in reference to failures, malfunctions, deficiencies, defective items, and nonconformances.

Corrected During the Audit (CDA) – Isolated deficiencies that do not require a root cause determination or actions to preclude recurrence, and where correction of the deficiency can be verified prior to the end of the audit. Examples include one or two minor changes required to correct a procedure (isolated), one or two forms not signed or dated (isolated), and one or two individuals who have not completed a reading assignment.

Four WAP-related discrepancies that resulted in CDAs were identified and corrected during this audit, and are described below.

CDA 1

An appointment letter for Site Project Quality Assurance Officer/Facility Quality Assurance Officer (SPQAO/FQAO) was not on file for the individual validating NCR-NTS-0011-03 –R0. There is also no reference in CCP-QP-002 Rev. 13, *CCP Training and Qualification Plan*, for notification to the Training Specialist, of an appointment letter for the position of the FQAO. This concern was satisfactorily resolved by issuance of an appointment letter for the FQAO position and initiation of procedure changes to CCP-QP-002 via the freeze file system.

CDA 2

In the NTS AK Summary Report CCP-AK-NTS-001 R5, there is a discrepancy in the assignment of HWN DO19 to waste stream NTLLNL S5400-252. Table 4-2, p.35, does not list the code but the text in Section 5.4.3, p.60, assigns the code D019 to the stream. This concern was satisfactorily resolved by making the appropriate changes to the AK summary reports and the initiation of procedure changes to CCP-AK-NTS-001 via the freeze file system.

CDA 3

The “Software Code Management: Code Information Summary” has main headings for software category in addition to a column for software category. The information in these columns is sometimes conflicting. The main heading “System Software” has Excel sheets listed as commercial software in the column. This concern was resolved by a revising the “Software Code Management: *Code Information Summary*” and correcting both the main headings and the category column.

CDA 4

The RIDS for NTS did not include the QA records listed in CCP-TP-030, R9 for Certification Module or Payload Characteristics. All required records were being retained in QA records. This concern was satisfactorily resolved via initiation of a CCP Records Inventory Worksheet to include the records on the next revision of the RIDS.

7.0 SUMMARY OF OBSERVATIONS AND RECOMMENDATIONS

During the audit, the audit team may identify conditions that warrant input by the audit team to the audited organization regarding potential problems or suggestions for improvement. The audit team members, in conjunction with the ATL, evaluate these conditions and classify them as Observations or Recommendations, using the following definitions. Once a determination is made, the audit team members, in conjunction with the ATL, categorize the conditions appropriately.

Observation – A condition that, if not controlled, could result in a CAQ.

Recommendation – Suggestions that are directed toward identifying opportunities for improvement and enhancing methods of implementing requirements.

7.1 Observations

The audit team made no Observations as a result of the audit.

7.2 Recommendations

The audit team made one Recommendation for improvement of the CCP processes and procedures. The Recommendation, provided to CCP management for consideration, is described below:

Recommendation 1

Certificates for seven of eight certified gases/liquid standards were not available on-site at the CCP offices. The audit team therefore recommended that all certificates of analysis be kept by the CCP records organization.

8.0 LIST OF ATTACHMENTS

- Attachment 1: Personnel Contacted During the Audit
- Attachment 2: Corrective Action Supporting Documentation
- Attachment 3: Objective Evidence
- Attachment 4: NTS/CCP Implementing Documents/Procedures

PERSONNEL CONTACTED DURING THE AUDIT				
NAME	TITLE/ORG	PRE AUDIT MEETING	CONTACTED DURING AUDIT	POST AUDIT MEETING
Aldrich, Beth	L&M Document Services		X	
Ashford, Angela	L&M Doc. Services/CCP		X	
Becker, David	CCP AK/LANL	X	X	
Bickerstaff, Sheila	CCP Record Custodian	X	X	X
Campos-Hernandez, Lisa	CCP/WWIS Data Entry		X	
Carter, Donna	L&M/CCP		X	
Clifton, Erin	L&M/CCP		X	
Colarusso, Angela	NNSA/NV TRU Project Manager			X
Fesmire, Courtland	CCP/SPM-NTS	X	X	X
Fisher, A.J.	CCP QA Manager	X	X	X
Freeze, Deborah	CCP Training Specialist	X	X	X
Franco, Joe	CCP/Project Manager	X	X	X
Gomez, Christine	CCP/WTS/SPQAO		X	X
Gran, J.F.	CCP SPQAO		X	
Guerin, David	CCP AK Expert		X	
Haar, David	CCP Program Manager	X	X	X
Hackney, Leanne	CCP/WTS		X	
Hedahl, Tim	Deputy Manager, NTP		X	X
Mooney, Dean	CCP/SPQAO		X	
Peters, Kevin	CCP/Tech. Specs., AKE	X	X	X

PERSONNEL CONTACTED DURING THE AUDIT				
NAME	TITLE/ORG	PRE AUDIT MEETING	CONTACTED DURING AUDIT	POST AUDIT MEETING
Porter, Larry	CCP/WTS	X	X	X
Price, Lisa	L&M Document Services		X	
Quintana, Doris	CCP SPQAO			X
Quintana, Irene	CCP SPQAO	X	X	
Rose, Steve	CCP/WTS	X	X	X
Schoen, Doug	CCP-Procurement		X	X
Sharif, Farok	Manager, NTP	X	X	X
Smith, Tyrone	CCP/WTS-M&TE Custodian		X	
Speed, Dave	WWIS Team Lead		X	
Stepzinskie, Chuck	CCP Tech. Writer, L&M		X	
Stroble, J.R.	CCP/WTS, WCO Manager, Project Cert.		X	

AUDITED CCP IMPLEMENTING DOCUMENTS/PROCEDURES		
Number of Documents	Procedure Number/Rev. No.	DOCUMENT TITLE
1	CCP-PO-002	CCP Transuranic Waste Certification Plan
2	CCP-PO-008	CCP Quality Assurance Administrative Program
3	CCP-PO-009	CCP/NTS Interface Document
4	Bechtel Nevada/WTS Contract/ Statement of Work	Bechtel Nevada, NTS Statement of Work for Characterization of NTS TRU Waste
5	CCP-QP-001	CCP Graded Approach
6	CCP-QP-002	CCP Training and Qualification Plan
7	CCP-QP-004	CCP Corrective Action Management
8	CCP-QP-005	CCP TRU Nonconforming Item Reporting and Control
9	CCP-QP-006	CCP Corrective Action Reporting and Control
10	CCP-QP-008	CCP Records Management
11	CCP-QP-009	CCP Work Control Process
12	CCP-QP-010	CCP Document Preparation, Approval and Control
13	CCP-QP-011	CCP Notebooks & Logbooks
14	CCP-QP-015	CCP Procurement
15	CCP-QP-016	CCP Control of Measuring, Testing, and Data Collection Equipment
16	CCP-QP-017	CCP Identification and Control of Items
17	CCP-QP-018	CCP Management Assessments
18	CCP-QP-019	CCP Quality Assurance Reporting to Management
19	CCP-QP-021	CCP Surveillance Program
20	CCP-QP-022	CCP TRU Software Quality Assurance
21	CCP-QP-023	CCP Handling, Storage, and Shipping
22	CCP-QP-026	CCP Inspection Control
23	CCP-QP-027	CCP Test Control
24	CCP-QP-028	CCP Records Filing, Inventorying, Scheduling, and Dispositioning
25	CCP-TP-001	CCP Project Level Data Validation and Verification
26	CCP-TP-002	CCP Reconciliation of DQOs and Reporting Characterization Data
27	CCP-TP-003	CCP Sampling Design and Data Analysis for RCRA Characterization
28	CCP-TP-005	CCP Acceptable Knowledge Documentation
29	CCP-TP-007	CCP Single Sample Manifold Headspace Gas Sampling and Analysis Procedure
30	CCP-TP-009	CCP Single Sample Manifold Data Handling Procedure
31	CCP-TP-028	CCP Radiographic Test and Training Drum Requirements
32	CCP-TP-029	CCP Single-Sample Manifold Headspace Gas Sampling and Analysis Methods and Equipment Calibration
33	CCP-TP-030	CCP WWIS Data Entry and TRU Waste Certification
34	CCP-TP-032	CCP Single Sample Manifold Data Validation Procedure
35	CCP-TP-045	CCP RTR #5 Radiography Inspection Operating Procedure
36	CCP-TP-056	CCP HSG Performance Demonstration Plan
37	CCP-TP-061	CCP TRU Waste Container Inspection and Control at NTS
38	CCP-TP-062	CCP TRU Waste Examination, Segregation, and Repacking at the NTS WEF