

United States Government

Department of Energy

**memorandum**Carlsbad Field Office  
Carlsbad, New Mexico 88221

DATE: February 26, 2004


REPLY TO  
ATTN OF: CBFO:QA:MPN:GS:04-0060:UFC 2300.00

SUBJECT: Surveillance Report S-0-09 of the Idaho National Engineering and Environmental Laboratory, Independent Analytical Laboratory Operations

TO: Edward Ziemianski, ID

The Carlsbad Field Office (CBFO) conducted a surveillance of selected Idaho National Engineering and Environmental Laboratory (INEEL) analytical laboratory activities on February 10-11, 2004. The surveillance team concluded that the INEEL analytical laboratory program continues to be adequate, satisfactorily implemented and effective. The CBFO surveillance report is attached. There were no Corrective Action Reports issued as a result of the surveillance.

If you have any questions or comments concerning this report, please contact me at (505) 234-7483.

  
Martin P. Navarrete  
Quality Assurance Specialist



## Attachment

cc: w/attachment

A. Holland, CBFO	*ED
D. Miehs, CBFO	*ED
K. Watson, CBFO	*ED
J. Well, DOE-ID	*ED
S. Sailer, INEEL	*ED
K. Crowder, INEEL	*ED
S. Lee, ANL-W	*ED
S. Zappe, NMED	*ED
B. Walker, EEG	*ED
CBFO QA file	
CBFO M&RC	

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U.S. DEPARTMENT OF ENERGY  
CARLSBAD FIELD OFFICE

SURVEILLANCE REPORT

OF THE

IDAHO NATIONAL ENGINEERING AND ENVIRONMENTAL  
LABORATORY

IDAHO FALLS, IDAHO

SURVEILLANCE NUMBER S-04-09

February 10-11, 2004

TRU WASTE  
LABORATORY SAMPLING AND ANALYSIS PROGRAMS



Prepared by: Earl Bradford  
Earl Bradford, CTAC  
Surveillance Team Leader

Date: 2/24/04

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

Date: 2/27/04

## 1.0 EXECUTIVE SUMMARY

Carlsbad Field Office (CBFO) Surveillance S-04-09 was conducted to evaluate the continued implementation and effectiveness of technical and quality assurance (QA) activities related to the Idaho National Engineering and Environmental Laboratory (INEEL) analytical laboratory functioning as an independent sampling and analysis laboratory. The INEEL analytical laboratory provides sampling and analysis services for generator sites in accordance with Waste Analysis Plan (WAP) requirements. The generator sites retain responsibility for waste certification in accordance with their respective certification programs. The INEEL activities evaluated included selected QA program activities, sample management, and generation-level data verification and validation (V&V).

The surveillance was conducted at the INEEL facilities February 10 and 11, 2004. The surveillance team concluded that, overall, the INEEL technical and QA procedures are adequate relative to the flow-down of requirements from the CBFO Quality Assurance Program Document (QAPD); the Waste Isolation Pilot Plant (WIPP) Hazardous Waste Facility Permit (WAP); and the Contact-Handled Transuranic Waste Acceptance Criteria (WAC) for the WIPP. The surveillance team also concluded that the QA program is satisfactorily implemented in accordance with the CBFO contract and statement of work, as well as the INEEL implementing procedures. The surveillance team determined that the INEEL technical areas evaluated were satisfactorily implemented and effective. No concerns were identified as a result of the surveillance.

## 2.0 SCOPE

The surveillance team evaluated the implementation and effectiveness of selected technical and QA processes related to the INEEL analytical laboratory program.

The following QA activities were evaluated in accordance with the CBFO QAPD:

- QA Program Interfaces
- Nonconformances and Corrective Action
- Personnel Qualification and Training
- Documents and Records
- Procurement
- Control of measuring and test equipment (M&TE) used for characterization
- Audits/Assessments

The following INEEL technical activities were evaluated in accordance with the WAC/WAP:

- Sample Management
- Generation-level data V&V

Programmatic and technical checklists were developed from the current revisions of the following documents:

- *CBFO Statement of Work for the INEEL TRU Waste Characterization Program*
- *INEEL, Analytical Laboratories Department Quality Assurance Plan, PLN-600*
- *INEEL, TRU Waste Characterization Quality Program Plan, PLN-1258*

Related INEEL technical and QA implementing procedures and Argonne National Laboratory – West (ANL-W) technical implementing procedures (see Attachment 2)

### **3.0 SURVEILLANCE TEAM AND OBSERVERS**

#### **SURVEYORS/TECHNICAL SPECIALISTS**

Earl Bradford  
BJ Verret

Audit Team Leader / CTAC  
Technical Specialist / CTAC

#### **OBSERVER**

Ben Walker

Observer / Environmental Evaluation Group  
(EEG)

### **4.0 SURVEILLANCE PARTICIPANTS**

INEEL individuals involved in the surveillance are identified in Attachment 1. A pre-surveillance meeting was held at INTECH on February 10, 2004. The surveillance was concluded with a post-surveillance meeting at INTECH on February 11, 2004.

### **5.0 SUMMARY OF SURVEILLANCE RESULTS**

#### **5.1 Program Adequacy, Implementation, and Effectiveness**

The surveillance team concluded that the INEEL technical and QA procedures adequately reflect the requirements from the CBFO QAPD, WIPP Hazardous Waste Facility Permit, the WAP, and the WAC. The surveillance team concluded that the QA Program is being satisfactorily implemented in accordance with the INEEL Quality Plan for the INEEL TRU Waste Characterization Program and implementing procedures. The INEEL technical processes evaluated were determined to be satisfactorily implemented and effective.

## **5.2 QA Program Activities Evaluated**

The surveillance team verified continued implementation of the INEEL QA program documents and evaluated quality program activities associated with personnel training and qualification, control of non-conformances and corrective actions, control of documents and records, control of procurements, control of measuring and test equipment, and program assessments.

The surveillance team determined that the INEEL QA Program and the QA program activities evaluated were satisfactorily implemented and effective.

## **5.3 Technical Activities Evaluated**

### **5.3.1 Sample Handling and Chain-of-Custody**

The surveillance team evaluated the processes for sample handling, sample chain-of-custody, and sample disposition being implemented for the INEEL analytical laboratories program. Sample handling activities at both analytical laboratories (ALD and ECL) and ANL-W were evaluated and found to be acceptable. The surveillance team determined that sample handling was performed in accordance with the appropriate procedures. The samples were stored correctly and were being adequately tracked as they moved through the analysis processes.

The surveillance team determined that the chain-of-custody program and procedures were satisfactorily implemented and effective.

### **5.3.2 Generation-Level Data V&V**

The surveillance team evaluated the generation-level data recording and review processes being implemented by the analytical laboratory program. The evaluation included the data recording, review, and reporting processes. The surveillance team determined that data are generated and entered in accordance with procedures and any pertinent observations and/or notations of reportable occurrences are adequately documented. The surveillance team examined data packages from the solids analysis, including analysis for metals (mercury and inductively coupled plasma elements), volatile organic compounds (VOCs), semivolatile organic compounds (SVOCs), and nonhalogenated volatile organic compounds (NHVOCs). In addition, the surveillance team examined batch data packages for headspace gas (HSG) analysis, solids coring/sampling and visual examination (VE). The surveillance team determined that data generation-level independent technical reviews are performed in accordance with procedures. The surveillance team also determined that supervisor and QA reviews of the data are performed in accordance with procedures.

The surveillance team concluded that the procedures continue to be satisfactorily implemented and effective.

## **6.0 CORRECTIVE ACTION REPORTS (CARs), OBSERVATIONS, RECOMMENDATIONS**

No conditions adverse to quality, observations, or recommendations were identified during the surveillance. No CARs were issued as a result of the surveillance.

## **7.0 LIST OF ATTACHMENTS**

Attachment 1: Personnel Contacted During the Surveillance

Attachment 2: INEEL Procedures Evaluated

PERSONNEL CONTACTED DURING THE SURVEILLANCE				
NAME	TITLE/ORG	PRE-SURV. MEETING	CONTACTED DURING SURV.	POST- SURV. MEETING
Anselmo, Rick	Tech Lead / BBWI		X	
Bradford, Rhett	VVE / ANL-W	X	X	
Bransen, Richard	QC Chemist / ALD		X	
Brush, Bevin A.	Training Officer / ANL-W		X	
Coburn, Klayne	Group Lead / ANL-W		X	
Croft, Alan	FQR / ANL-W		X	
Crowder, Catherine	Program Manager / ECL. Tech Lead	X	X	X
Dunhour, Fred	FQAO / ALD	X	X	X
Hand, Rodney	Analytical Labs Manager			X
Lee, Scott	PM / ANL-W	X	X	X
Magnam, James M.	Sys. Eng. / ANL-W		X	
Sailer, Shelly	SPQAO / INEEL TWCP	X	X	X
Taylor, Vera	Records Coordinator / ALD		X	
Walters, Gail	REC. / ANL-W	X	X	

