



United States Government

Department of Energy

memorandum

 Carlsbad Field Office
 Carlsbad, New Mexico 88221

DATE: January 4, 2005

 REPLY TO
 ATTN OF: CBFO:QA:DSM:LC:05-0302:UFC:2300

 SUBJECT: Surveillance (S-05-04) of Argonne National Laboratory-East (ANL-E)/Washington TRU
 Solutions, Central Characterization Project (CCP) Services

TO: Andrew Gabel, DOE CH

The Carlsbad Field Office (CBFO) conducted a surveillance of selected ANL-E/CCP activities on December 7-8, 2004. The surveillance team concluded that the characterization activities have been properly closed out. The CBFO surveillance report is attached. There were no CBFO Corrective Action Reports (CARs) issued as a result of the surveillance.

If you have any questions or comments concerning the surveillance, please contact me at (505) 234-7491.

 Dennis S. Miehls
 Quality Assurance Specialist


Attachment

 cc: w/attachment
 A. Holland, CBFO *ED
 K. Watson, CBFO ED
 K. Joshi, DOE-CH ED
 J. Frego, ANL-E ED
 D. Haar, WTS ED
 T. Hedahl, WTS ED
 A. Fisher, WTS ED
 L. Greene, WRES ED
 A. Axinn, CTAC ED
 M. Eagle, EPA ED
 E. Feltcorn, EPA ED
 S. Zappe, NMED ED
 S. Holmes, NMED ED
 D. Winters, DNFSB ED
 CBFO QA Record File
 CBFO M&RC
 WIPP Operating Record, MS 486-06

*ED denotes electronic distribution

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U.S. DEPARTMENT OF ENERGY
CARLSBAD FIELD OFFICE
SURVEILLANCE REPORT
OF THE
ARGONNE NATIONAL LABORATORY-EAST/
CENTRALIZED CHARACTERIZATION PROGRAM
CARLSBAD, NEW MEXICO
SURVEILLANCE NUMBER S-05-04

December 7 – 8, 2004

TRU WASTE
CHARACTERIZATION AND CERTIFICATION ACTIVITIES



Prepared by: *Charles L. Riggs* Date: 1/4/05
Charles L. Riggs for
Annabelle Axinn, CTAC
Surveillance Team Leader

Approved by: *Dennis S. Miehl* Date: 1-4-05
Dennis S. Miehl, CBFO
Quality Assurance Specialist

1.0 EXECUTIVE SUMMARY

The U. S. Department of Energy Carlsbad Field Office (CBFO) Surveillance S-05-04 was conducted December 7-8, 2004, at the Washington TRU Solutions (WTS) in Carlsbad, New Mexico, to evaluate the continued adequacy, implementation, and effectiveness of characterization and certification activities for the period between CBFO Audit A-04-03 and the last shipment of transuranic (TRU) waste to the Waste Isolation Pilot Plant (WIPP). The surveillance also included project closeout activities, including records disposition and turnover; preparation and turnover of applicable software programs for continued access and use; and the disposition and turnover of acceptable knowledge (AK) records for waste. The evaluation included implementation of technical and quality assurance (QA) activities related to characterization activities conducted at the Argonne National Laboratory-East/Central Characterization Project (ANL-E/CCP), and by WTS CCP in Carlsbad, New Mexico, in support of ANL-E. The ANL-E/CCP activities evaluated included selected QA program activities, processes, procedures, and personnel.

The surveillance team determined that the ANL-E/CCP areas evaluated were adequately proceduralized, that procedures were satisfactorily implemented, and that implementation was effective. One condition adverse to quality was identified, and was corrected during the surveillance (CDS). Two recommendations were presented to ANL-E/CCP management for consideration (Section 6.0).

2.0 SCOPE

The surveillance team evaluated elements of the ANL-E/CCP characterization activities to verify that the processes and procedures remained as they were previously certified and approved for debris waste (S5000), and homogeneous solid waste (S3000).

The following ANL-E/CCP activities were evaluated.

- Project documentation closeout
- Acceptable knowledge documentation closeout
- Database archiving, electronic data storage and recoverability
- QA Program Implementation

3.0 SURVEILLANCE TEAM AND OBSERVERS

SURVEILLANCE TEAM

Annabelle Axinn	Surveillance Team Leader, CBFO Technical Assistance Contractor (CTAC)
Prissy Martinez	Surveillance Team Member, CTAC
John Gray	Surveillance Team Member, CTAC
Jim Schuetz	Surveillance Team Member, CTAC

OBSERVERS

Steve Holmes
Dorothy Gill

New Mexico Environment Department (NMED)
NMED (Contractor)

SURVEILLANCE PARTICIPANTS

Personnel involved in the surveillance are identified in Attachment 1. A pre-surveillance meeting was held on December 7, 2004, and a post-surveillance meeting was held on December 8, 2004, at the WTS/CCP office in Carlsbad, NM.

SUMMARY OF SURVEILLANCE RESULTS

5.1 Project Documentation Closeout

The processes and activities associated with project documentation closeout were evaluated to the requirements of the CBFO Quality Assurance Program Document (QAPD) and ANL-E/CCP procedures. The ANL-E/CCP project records files were evaluated for content, classification of the records as lifetime or nonpermanent, retention times, storage methods, retrievability, and transmittal to the generator site.

Overall, it was concluded that the ANL-E/CCP project documentation closeout activities are adequate, satisfactorily implemented, and effective.

Acceptable Knowledge Documentation Closeout

The processes and activities associated with the AK documentation closeout effort were evaluated to the requirements of the CBFO QAPD and ANL-E/CCP procedures. The process for updating the AK baseline document, CCP-AK-ANLE-001, was reviewed, along with the current draft and a sampling of its reference documents. The inclusion of the referenced documents within the AK component of the QA record, their inclusion in the project closeout QA record, and the maintenance of the referenced documents were verified.

Overall, the surveillance team concluded that the ANL-E/CCP AK documentation closeout effort is adequate, satisfactorily implemented, and effective.

Software Closeout

The surveillance team evaluated implementation of software quality assurance Procedure CCP-QP-022, Revision 3, related to generation and maintenance of software records for closeout of ANL-E/CCP characterization activities. The surveillance team reviewed the ANL-E/CCP software QA procedures with respect to the CBFO QAPD and determined that there is adequate flow-down of upper tier requirements related to software management and documentation.

The surveillance team reviewed the software inventory (CCP Software Code Management: Code Information Summary) and determined that software used for characterization activities at ANL-E/CCP was controlled and retired in accordance with procedure. The surveillance team also reviewed a sample of software life-cycle document record packages and determined that software configuration was managed in accordance with procedure and that documentation is being reviewed for completeness and correctness prior to submittal as final records.

The surveillance team identified one deficiency during the review related to completion of forms used to track configuration of software and software life-cycle document versions. This deficiency was determined to be an isolated case based on a review of other similar forms that were properly completed. The surveillance team verified the existence of software life-cycle documents, verified that the incomplete form was revised to indicate version identification, and determined that the deficiency was corrected during the surveillance (see CDS-1).

The surveillance team presented two recommendations for ANL-E/CCP management consideration. The first recommendation addressed performance of a review of the software problem log to ensure that all reported problems were addressed and that no outstanding software problems exist that could impact software used to generate characterization results at ANL-E (see Recommendation 1).

The second recommendation addressed baseline software notebook documentation for the ANL-E/CCP WIPP Waste Information System (WWIS) spreadsheet. The ANL-E spreadsheet was copied from a baseline spreadsheet that was adequately developed and documented. Adequate change documentation for the ANL-E/CCP spreadsheet was verified in the record file. Including a copy of baseline development documentation in the ANL-E records file will provide the most complete copy of the lifecycle documents for this specific software application. The recommendation includes performing this type of record keeping for software that is copied and developed for other CCP locations (see Recommendation 2). The surveillance team determined that software life-cycle documentation and records are adequate.

Overall, it was concluded that ANL-E/CCP software closeout activities are adequate, satisfactorily implemented, and effective.

5.4 QA Program Implementation

The surveillance team verified continued implementation of the ANL-E/CCP QA program documents and evaluated quality program activities associated with personnel training and qualification, control of nonconformances and corrective actions, control of documents and records, and program assessments (management and independent).

Overall, it was concluded that the ANL-E/CCP quality assurance program documentation closeout effort is adequate, satisfactorily implemented, and effective.

CORRECTIVE ACTIONS AND RECOMMENDATIONS

6.1 Corrected During the Surveillance

CDS-1

The Active Passive Neutron Examination and Assay (APNEA) system software records package Requirements Checklist form (Attachment 13 of CCP-QP-022, *CCP TRU Software Quality Assurance*) was not complete. It did not include individual version identifiers for software life-cycle documents in the appropriate cells.

The Requirements Checklist form was completed during the course of the surveillance, referencing appropriate software life-cycle documents. This deficiency was determined to be an isolated case per a review of other similar forms that were properly completed.

6.2 Recommendations

The following recommendations were provided to ANL-E/CCP management during the surveillance.

Recommendation 1

Applicable baseline spreadsheet documentation for the parent application (including notebook and testing documentation from a template spreadsheet) implemented on projects other than those for which it was developed, should be copied and included in the closeout records on those projects' spreadsheets to show baseline development and testing.

Recommendation 2

A final review of the software problem log should be performed after characterization activities have ceased and prior to assembling software life-cycle documentation records packages to ensure that all reported problems have been properly documented.

LIST OF ATTACHMENTS

Attachment 1: Personnel Contacted During the Surveillance

Attachment 2: ANL-E/CCP Documents Evaluated

PERSONNEL CONTACTED DURING THE SURVEILLANCE				
NAME	TITLE/ORG	PRE-SURV. MEETING	CONTACTED DURING SURV.	POST-SURV. MEETING
Sheila Pearcy	CCP Records Custodian/WTS	X	X	X
Susanne Keathley	CCP Records Assistant/WTS		X	
A.J. Fisher	CCP Project QA Manager/WTS	X	X	X
David B. Becker	AKE/LANL	X	X	X
Steve Rose	CCP SPM/WTS	X	X	X
Ava Holland	CBFO QA Manager	X		X
Larry Porter	CCP SPM/WTS	X	X	X
Tim Hedahl	NTP Manager/WTS	X	X	X
S.E. Fabian	CCP Project-Support Manager/WTS	X		
Wayne Ledford	CTAC A&A Manager			X
Dennis Miehs	CBFO QA Specialist	X		X

ANL-E/CCP DOCUMENTS EVALUATED		
Number	Document/Rev. No.	DOCUMENT TITLE
1	CCP-AK-ANLE-001	Central Characterization Project Acceptable Knowledge Summary Report
2	CCP-TP-002	CCP Reconciliation of DQOs and Reporting Characterization Data
3	CCP-PO-002	CCP Transuranic Waste Certification Plan
4	CCP-PO-007	CCP/ANL-E Interface Document
5	CCP-QP-008	CCP Records Management
6	CCP-QP-028	CCP Records Filing, Inventorying, Scheduling, and Dispositioning
7	CCP-QP-022	CCP TRU Software Quality Assurance
8	CCP-QP-018	Management Assessments
9	CCP-QP-019	CCP QA Reporting to Management
10	CCP-QP-020	CCP Independent Assessments