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

January 7, 2005

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

Subject: Transmittal of the Certification Audit Report for the Savannah River Site (A-05-01)

Dear Mr. Zappe:

This letter transmits the Savannah River Site Audit Report for the processes performed to characterize and certify waste as required by Section II.C.2.c of the WIPP Hazardous Waste Facility Permit. The report contains the results of the Annual Re-certification Audit performed for the processes previously approved by New Mexico Environment Department (NMED) for the characterization and certification of retrievably stored debris waste. The Audit was conducted October 26-29, 2004.

I certify under penalty of law that this document and all enclosures were prepared under my direction or supervision in accordance with 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.

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

Sincerely,

Dr. Inés R. Triay
Acting Manager

Enclosures

CBFO:QA:DSM:LC:05-0303:UFC:2300

050107

cc: w/enclosure
WIPP Operating Record
CBFO M&RC

cc: w/o enclosure

L. Piper, CBFO	*ED
K. Watson, CBFO	ED
A. Holland, CBFO	ED
D. Miehls, CBFO	ED
H. Crapse, SR	ED
S. Zappe, NMED	ED
S. Holmes, NMED	ED
M. Eagle, EPA	ED
E. Feltcorn, EPA	ED
T. Hedahl, WTS	ED
S. Warren, WTS	ED
D. Haar, WTS	ED
A. Fisher, WTS	ED
L. Greene, WRES	ED
J. Wilburn, CTAC	ED
D. Winters, DNFSB	ED
CBFO QA File	

*ED denotes electronic distribution

U.S. DEPARTMENT OF ENERGY
CARLSBAD FIELD OFFICE

FINAL AUDIT REPORT

OF THE

SAVANNAH RIVER SITE (SRS)

AIKEN, SOUTH CAROLINA

AUDIT NUMBER A-05-01

OCTOBER 26 – 29, 2004

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

Prepared by: _____ **Date:** 01-06-05
Jimmy L. Wilburn, CTAC
Audit Team Leader

Approved by: _____ FOR **Date:** 1-6-05
Ava L. Holland, CBFO
Quality Assurance Manager

1.0 EXECUTIVE SUMMARY

Carlsbad Field Office (CBFO) Audit A-05-01 was conducted to evaluate the adequacy, implementation, and effectiveness of the Savannah River Site (SRS) transuranic (TRU) waste characterization activities performed by SRS or for SRS by the Central Characterization Project (CCP) for debris waste, relative to the requirements detailed in the Waste Isolation Pilot Plant (WIPP) Hazardous Waste Facility Permit (HWFP).

The CCP was developed by Washington TRU Solutions (WTS) to provide TRU waste characterization, certification, and transportation services, including the necessary management and administrative functions to ensure the acceptability of these processes in accordance with regulatory and site requirements. The Westinghouse Savannah River Company (WSRC) utilized the characterization services of the CCP, including overall process management.

The scope of the audit included Summary Category Group S5000 debris waste and two new real-time radiography (RTR) units on Pad 15 and RTR Unit #4. These units had not been audited previously at SRS.

The annual recertification audit was conducted at the SRS facilities October 26-29, 2004. The audit team concluded that the SRS/CCP technical and quality assurance (QA) programs, as applicable to the audited activities, met requirements contained in the HWFP. The audit team concluded that the defined QA and technical processes for the audited activities were being implemented in accordance with the *CCP Transuranic Waste Quality Assurance Characterization Project Plan* (CCP QAPjP) and related SRS/CCP implementing procedures. The audited processes were found to be adequate, satisfactorily implemented, and effective.

The audit team identified one HWFP-related condition adverse to quality necessitating the issuance of a CBFO corrective action report (CAR), CAR-05-005 (for details see Section 6.1). No deficiencies, isolated in nature and requiring only remedial corrective action, were corrected during the audit (CDA). One Observation was identified, and one Recommendation is being offered for SRS and CCP management consideration. The CAR is discussed in Section 6.1, the Observation is described in Section 7.1, and the Recommendation is offered in Section 7.2.

2.0 SCOPE AND PURPOSE

2.1 Scope

The audit team evaluated the adequacy, implementation, and effectiveness of the SRS/CCP TRU waste characterization processes for debris waste relative to the requirements contained in the WIPP HWFP, Attachments B through B6. Continued compliance was documented by completing the Attachment B6 checklist for the applicable SRS/CCP activities, including the two new RTR units on Pad 15 and RTR Unit #4.

The audit team evaluated the following program elements in accordance with the HWFP:

General

Results of previous audits
Changes in programs or operations
New programs or activities being implemented
Changes in key personnel

Quality

Nonconformances/Corrective Action
Personnel Qualification and Training
Documents and Records
Sample Control

Technical

Acceptable Knowledge (AK)
Headspace Gas (HSG) and Gas Volatile Organic Compounds (VOCs) Sampling and Analysis
Real-Time Radiography (RTR) including the two new units identified above
Visual Examination (VE)
Data Generation-Level Verification and Validation (V&V)
Project-Level V&V
WIPP Waste Information System (WWIS) Data Entry
Waste Stream Profile Form (WSPF)

The evaluation of SRS/CCP TRU waste activities and documents was based on current revisions of the following documents:

Waste Isolation Pilot Plant Hazardous Waste Facility Permit

CBFO 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 SRS/CCP technical and quality assurance implementing procedures

2.2 Purpose

Audit A-05-01 was conducted to assess the continued compliance of SRS/CCP debris waste characterization and certification activities with the WIPP HWFP, including the two new RTR units on Pad 15 and RTR Unit #4.

3.0 AUDIT TEAM AND OBSERVERS

AUDITORS/TECHNICAL SPECIALISTS

Jimmy Wilburn	Audit Team Leader, CBFO Technical Assistance Contractor (CTAC)
Steve Calvert	Auditor, CTAC
Charlie Riggs	Auditor, CTAC
Tommy Putnam	Auditor, CTAC
Tammy Bowden	Auditor, CTAC
Pete Rodriquez	Auditor, CTAC
Jim Schuetz	Auditor, CTAC
Wayne Ledford	Auditor, CTAC
Norman Frank	Auditor, CTAC
Annabelle Axinn	Auditor, CTAC
Sandra Harrison	Auditor, CTAC
Dick Blauvelt	Technical Specialist, CTAC
Patrick Kelly	Technical Specialist, CTAC
Karen Gaydosh	Technical Specialist, CTAC
B. J. Verret	Technical Specialist, CTAC

OBSERVERS

Russell McCallister	CBFO
Steve Holmes	New Mexico Environment Department (NMED)
Carl Chavez	NMED
Bob Thielke	NMED Contractor

4.0 AUDIT PARTICIPANTS

SRS and SRS/CCP individuals involved in the audit process are identified in Attachment 1. A preaudit meeting was held in SRS Building 766H, Room 2138, on October 26, 2004. Daily meetings were held with SRS and SRS/CCP management and staff to discuss issues and potential deficiencies. The audit was concluded with a postaudit meeting held in Building 766H, Room 2138, on October 29, 2004.

5.0 SUMMARY OF AUDIT RESULTS

5.1 Program Adequacy and Implementation

This audit was performed to assess the ability to characterize debris waste from Summary Category Group S5000 to the requirements specified in the WIPP Waste Analysis Plan (WAP). The characterization methods assessed were HSG sampling and analysis, AK, RTR, and VE. Data review, validation, DQO reconciliation, WWIS data entry, and the preparation of the WSPFs were also assessed. Waste streams from Summary Category Group S3000 and S4000 will require an additional audit because the requirements specific to these areas were not included in the scope of Audit A-05-01.

The audit team concluded that the applicable TRU waste characterization activities, as described in the associated SRS/CCP implementing procedures, satisfactorily meet the requirements contained in the HWFP. The deficiencies identified in Section 6.0 have been corrected. The supporting documentation for the closure of the CAR is contained in Attachment 2. Details of audit activities, including specific objective evidence reviewed, is described below and is documented in the attached B6 checklist. The B6 checklist identifies the SRS/CCP program documents and procedures in which the WAP requirements are met. Attachment 3 contains examples of the objective evidence reviewed during the audit.

A list of SRS/CCP documents evaluated during the audit is provided in Attachment 4.

5.2 Technical Activities

Each technical area audited is discussed in detail in the following sections. The method used to select objective evidence is discussed, the objective evidence used to assess compliance with the WAP is cited briefly (and in detail on the checklist), and the result of the assessment is provided.

Objective evidence to evaluate the implementation of the associated characterization activities was selected and reviewed. Batch data reports and training documentation for TRU Waste Characterization Program (TWCP) personnel were included in the evaluation. The audit included direct observation and/or a demonstrated walk-through of waste characterization activities (such as gas sampling and analysis, RTR, 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 (SPO)
- Comparing the data against program DQOs
- Reporting the final waste characterization information to WIPP

Each checklist question that could not be satisfactorily answered resulted in an audit deficiency. All items were adequately addressed during the audit.

5.2.1 Table B6-1 WAP Checklist

The B6-1 WAP checklist addresses program requirements from an overall management perspective and the validation of the data at the site project level. It documents the verification that the waste characterization strategy, as defined in the WAP, is implemented by using controlled procedures. In addition, Table B6-1 documents the site project-level reviews of the data collected as a result of the waste characterization implementing procedures. This audit was performed to assess the continued ability of

the SRS/CCP to characterize Summary Category Group S5000 debris waste. Objective evidence was reviewed as part of this assessment and utilized in the completion of this table. The objective evidence included completed batch data reports (completed through the SPO review) for RTR, HSG, and VE. In addition, procedures and objective evidence were reviewed to ensure that SRS/CCP could adequately perform data reconciliation and properly prepare a WSPF.

Objective evidence was reviewed to make a determination of the adequacy of the SPO V&V procedures. Evidence included batch data reports from each of the waste characterization activities.

The flow of data from the point of generation to inclusion in the WSPF for each characterization technique was reviewed to ensure that all applicable requirements were captured in the site operating procedures. The material in this section is also addressed in more detail in the following checklists, where the specific procedures audited and the objective evidence reviewed is identified.

Compliance with the characterization requirements of the WAP was demonstrated through documentation and by demonstrating the characterization activities. The project-level data V&V process was evaluated by reviewing the following batch data reports:

RTR

SRSRTR0001
SRRTR0899
SR4RTR0002
SRRTR1111

VE

SR04-VECCP-003
SR03-VECCP-016

HSG

020904B2
051204A
072104A1

Copies of these batch data reports are included in Attachment 3.

AK and the auditable record were reviewed in detail for Summary Category Group S5000 waste streams. The AK record was reviewed to demonstrate that the required information was present and correctly interpreted. The batch data reports cited above were used to demonstrate confirmation of AK, reconcile DQOs, prepare a WSPF, and transmit data to WIPP using the WWIS.

WSPFs SR-W026-772F-HET and SR-W027-235F-HET, and the summarized characterization information related to them, were reviewed to establish the objective evidence for reporting waste characterization information to WIPP. The form was

completed using information from current characterization processes. As required, an actual WSPF was prepared and submitted to CBFO prior to waste shipment. The form was reviewed and approved by the CBFO when the waste stream had been fully characterized and the site was approved to ship waste.

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

No solids or soils/gravel waste streams are currently being processed at SRS. These areas were not audited; therefore, no SRS S3000 or S4000 waste will be accepted for disposal at WIPP until the procedures and processes have been audited and accepted by CBFO and a final audit report for those processes has been approved by NMED.

5.2.3 Table B6-3 Acceptable Knowledge Checklist

This audit was performed to assess the ability of SRS/CCP to characterize Summary Category Group S5000 debris waste streams. Items on the AK checklist are intended to ensure that SRS/CCP has an AK process in place to:

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

The audit team reviewed AK Summary Reports CCP-AK-SRS-5 R1 (for waste stream SR-W026-772F-HET), CCP-AK-SRS-6 R0 (for waste stream SR-W027-235F-HET), and CCP-AK-SRS-7 R0 (for waste stream SR-W027-773A-HET). In addition, the audit team reviewed the results of confirmatory test data for the first two waste streams, observing reconciliation of the data with the AK record.

The following AK procedures were evaluated:

- CCP-TP-002, *CCP Reconciliation of DQOs and Reporting Characterization Data*
- CCP-TP-003, *Sampling Design and Data Analysis for RCRA Characterization*
- CCP-TP-005, *CCP Acceptable Knowledge Documentation*

The cited procedures are used to assemble, evaluate, document, and reconcile testing and sampling and analysis results. The audit team reviewed the procedures for adequacy during the audit and assessed their implementation.

Several of the AK references were selected to ensure they are included in the auditable record and to ascertain if these AK source documents supported AK determinations,

such as assignment of hazardous waste codes. These AK sources include such items as published reports, process flow diagrams, and interviews with site personnel concerning the use of hazardous materials, and reports of previous waste characterization sampling and analysis efforts. The review of these references resulted in a determination that limitations of the AK documentation have been documented as required by the WAP. In addition, the audit team reviewed and collected documentation resolving discrepancies in the AK record. The team verified that all WAP required programmatic and waste stream-specific information had been compiled and justified in the three subject AK Summaries.

The WAP-required traceability exercise was carried out for two containers from waste stream SR-W026-772F-HET and two containers from SR-W027-235F-HET. The AK information, including waste container input forms and confirmatory test batch data reports for containers SR515489, 772F010011, SR82627, and 235F01077, was traced to verify characterization as determined by the AK. The information was available in the record files and supported the AK determination. The audit team also reviewed other AK records derived from confirmatory testing including relevant waste stream profile forms and attachments such as the characterization information summary and the DQO checklist. Documentation was reviewed and collected that addressed a) the resolution of discrepancies between confirmatory test data and the AK record, b) the reevaluation of the AK record as needed, c) corrective action dealing with the discovery of prohibited items in waste containers, and d) compliance with AK data quality objectives.

All of the objective evidence utilized to demonstrate the implementation and effectiveness of the AK process, as called out by the B6-3 checklist, is included in Attachment 3. The documentation was determined to be satisfactory and the QA records properly maintained.

The audit team concluded that the SRS/CCP AK process is adequate, satisfactorily implemented, and effective.

5.2.4 B6-4 Headspace Gas Checklist

This audit was performed to assess the ability of SRS/CCP to characterize Summary Category Group S5000 debris waste. The CCP procedures governing on-line sampling and analysis activities and data review and validation included:

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-029, *CCP Single-Sample Manifold Headspace Gas Sampling and Analysis Methods and Equipment Calibration*

CCP-TP-032, *CCP Single Sample Manifold Data Validation Procedure*

HSG sampling and analysis activities were evaluated by reviewing the sampling equipment, observing sampling and analysis activities, and reviewing available HSG

batch data reports. Batch data reports 101204A1 and 092604A1 were reviewed to evaluate sampling and analysis results against WAP requirements. Successful participation by SRS/CCP in the most recent round of HSG Performance Demonstration Program (PDP) analyses was verified. Gas and liquid standards, personnel training and qualifications, and measuring and test equipment calibration were audited and found to be acceptable.

Documentation specific to these activities (e.g., calibration records, maintenance logbooks, and instrument logbooks) was reviewed to ensure that the mobile operations met QA requirements, as specified in the WAP.

The SRS/CCP HSG sampling is accomplished using a single-sample manifold system. The system automatically penetrates the drum using a specially designed, self-drilling, self-tapping, hollow-core filter vent. The filter or plug is installed in a socket inside the glove box powerhead prior to drum processing. Samples are collected when the powerhead 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 utilizes a photoionization detector (PID) (to determine cleanliness of the system prior to sampling), purge gas (ultra pure nitrogen), and calibrated pressure/vacuum gauges. Volatile organic compounds (VOCs) are analyzed using a mass spectrometer detector. Hydrogen and methane are analyzed at the same time as VOCs, using dual detectors on the outflow of the gas chromatograph. Additional detail describing the sampling and analytical system is included in the CCP QAPjP and Procedure CCP-TP-007, *CCP Single Sample Manifold Headspace Gas Sampling and Analysis Procedure*.

Sample collection is assessed by collecting QC samples and evaluating the data against specific quality assurance objectives (QAOs). Sample collection and analysis is controlled by Procedure CCP-TP-007. The review of the results to ensure they meet program QAOs is controlled by Procedure CCP-TP-032, *CCP Single Sample Manifold Data Validation Procedure*. Sampling QAOs are assessed after the QC samples have been analyzed and are documented in the analytical batch data report.

A review of the batch data report verified compliance with the WIPP WAP requirements and verified that the SRS/CCP plans and procedures successfully implement requirements in both the technical and QA areas. Pages from the batch data report that serve as objective evidence for implementation of activities required by the B6-4 checklist are provided in Attachment 3.

No concerns were identified during the audit.

The audit team concluded that the SRS/CCP HSG sampling and analysis processes are adequate, satisfactorily implemented, and effective.

5.2.5 Table B6-5 Radiography Checklist

This audit was performed to assess the ability of SRS/CCP to characterize Summary Category Group S5000 debris waste. SRS/CCP radiography operations are performed using a real-time system that meets the system specifications identified in the WAP. SRS/CCP has controls to allow the operator to enhance the image quality of the radiograph, provide narration with the video, rotate the drum as it is imaged, enlarge the image, and pan up and down the container. The system allows personnel to view drums while recording the examination on an audio/videotape.

The Table B6-5, Radiography Checklist, was completed by assessing the following operating procedures:

CCP-TP-011, *CCP Radiography Inspection Operating Procedure*

CCP-TP-028, *CCP Radiographic Test and Training Drum Requirements*

CCP-TP-053, *CCP Standard Real-Time Radiography (RTR) Inspection Procedure*

CCP-TP-145, *CCP RTR#4 Radiography Inspection Operating Procedure at SRS*

During audit team activities, RTR operations were observed, videotapes were reviewed, the RTR of drum SR593122 on Pad 15 and drum SR593123 at Unit # 4 was observed, and the documentation resulting from these activities was evaluated. The RTR units on Pad 15 and RTR Unit #4 are **new** units that had not previously been audited at SRS. Videotapes of RTR scans performed on SRS/CCP's currently approved Unit #1 were also reviewed during the audit. Batch data reports SRRTR1111, SRRTR0899, SRSRTR0001, and SR4RTR0002, were reviewed and are included in Attachment 3.

The batch data reports were reviewed to evaluate SRS/CCP compliance with CCP-TP-011, *CCP Radiography Inspection Operating Procedure*, which controls the data generation-level independent technical review, the technical supervisor review, and the QA officer review. The batch data report reviews conducted to the requirements of the procedure were found to be in compliance with the WAP requirements for data generation-level review.

Training course materials and the videotapes of RTR test drums SRS-NDE-TEST-05 and SRS-NDE-TEST-06 were reviewed to ensure they are in accordance with WAP requirements. Training files were reviewed for operators to verify that individuals responsible for performing the radiography of drums have been properly trained and qualified.

Radiography equipment maintenance and daily checks were evaluated in accordance with WAP requirements and the RTR procedures and determined to be properly implemented. Radiographic results are being properly reported on standard forms and reviewed, as required by the WAP. Copies of the forms are included in the batch data reports in Attachment 3.

One condition adverse to quality resulted in the issuance of a CAR, and one Observation was identified during the audit. The CAR and the Observation are described in detail in Sections 6.1 and 7.1, respectively.

Several waste containers have been examined that have significant numbers of lead-lined gloves. Portions of the containers cannot be penetrated. No nonconformance report (NCR) was generated for these containers. Examples reviewed during the audit included drums SR593125, SR557550, SR281672, and SR281819 (see CAR 05-005, Section 6.1).

SRS/CCP did not have copies of the AK summaries in the new RTR units (Pad 15 and Unit #4), this information was available in the currently approved RTR unit #1. SRS/CCP should ensure that the AK summaries are readily available in each RTR unit. During the audit SRS/CCP placed copies of the AK summary documentation in the new RTR units (see Observation, Section 7.1).

The audit team concluded that the SRS/CCP radiography processes are adequate, satisfactorily implemented, and effective, with completion of the corrective action for CAR-05-005.

5.2.6 Table B6-6 Visual Examination Checklist

This audit was performed to assess the ability to characterize Summary Category Group S5000 debris waste streams. The SRS/CCP 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 the following procedures:

CCP-TP-085, *CCP TVEF Facility Operations*

CCP-TP-087, *CCP Scale Operations*

CCP-TP-088, *CCP Disposal Program Data Generation Level Review for VE*

CCP-TP-113, *CCP Standard Waste Visual Examination*

CCP-TP-136, *CCP Standardized Prohibited Item Remediation*

SRS/CCP VE activities were evaluated by observing operations, reviewing audio/ videotapes, evaluating VE batch data reports, and interviewing VE personnel. The audit team examined the VE program for the SRS/CCP. Batch data reports SR04-VECCP-003, SR04-VECCP-016, and SR04-VECCP-023, and associated videotapes, were examined for VE as a quality control check of radiography. Batch data reports SRVEP60001 and SRVEP60002, and associated videotapes, were examined for VE in lieu of radiography. The batch data reports are included in Attachment 3.

The implementation and effectiveness of Procedure CCP-TP-136, *Standardized Prohibited Item Remediation*, were initially judged to be indeterminate because the

procedure had not been fully implemented. The procedure was determined to be adequate. Subsequent to the audit, CCP completed documentation of the remediation of container SR109690. This documentation has been reviewed by the audit team and CCP-TP-136 has been determined to be adequate, satisfactorily implemented, and effective.

VE operations at the TRU Visual Examination Facility were evaluated in accordance with CCP-TP-085. Data generated from these VE activities are compiled and reviewed in accordance with CCP-TP-088. The batch data reports were reviewed to ensure that the information collected using the VE procedure meets the WAP requirements. In addition, the batch data reports were reviewed to verify that the independent technical review, the technical specialist review, and the QA officer review were conducted as defined in Procedure CCP-TP-088. The procedures were found to be adequate in meeting WAP requirements.

The audit team evaluated CCP-TP-003, which is used to randomly select drums to confirm radiography results. It was confirmed that the selection of the drums for VE was random and the drums were selected from the available drum population in accordance with the WAP requirements.

The training course content for operators and VE experts was reviewed to verify that all WAP requirements were included. SRS/CCP VE training requirements are contained in the QAPjP. Training files were reviewed for VE experts and operators to verify that individuals responsible for performing the visual examination of drums have been properly trained and qualified.

The audit team concluded that the SRS/CCP VE processes are adequate, satisfactorily implemented, and effective.

5.2.7 General

Results of Previous Audits

The results of SRS/CCP Recertification Audit A-04-01 were examined and it was determined that the concerns identified in the audit had been addressed.

Changes in Programs or Operations

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.

New Programs or Activities Being Implemented

Two new RTR units have been placed into service by SRS/CPP (Unit # 4 and the unit on Pad 15). The operation of these units was reviewed during the audit.

Changes in Key Personnel

SRS/CCP has changed personnel at the Site Project Manager (SPM) position. No other changes in SRS/CCP key personnel have occurred since the last recertification audit. SRS/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 Quality Assurance (QA) program.

One condition adverse to quality resulted in the issuance of a CAR during the audit.

CAR 05-005:

Several waste containers have been examined that have significant quantities of lead-lined gloves. Portions of the containers cannot be penetrated. No NCR was generated for these containers. Examples reviewed during the audit include drums SR593125, SR557550, SR281672, and SR281819.

Corrective actions have been taken and CBFO CAR 05-005 has been closed. Details are contained in Attachment 3, Corrective Action Supporting Documentation.

6.2 Deficiencies Corrected During the Audit

During the audit, the audit team may identify CAQs. Using the following definitions, the audit team members and the Audit Team Leader (ATL) evaluate the CAQs to determine if they are significant:

CAQ – Term used in reference to failures, malfunctions, deficiencies, defective items, and nonconformances.

Significant CAQ – 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 Quality Assurance (QA) program.

Once a determination is made that the CAQ is not significant, the audit team member, in conjunction with the ATL, determines if the CAQ is an isolated case requiring only

remedial action and therefore can be corrected during audit (CDA). Upon determination that the CAQ is isolated, the audit team member, in conjunction with the ATL, evaluates/verifies any objective evidence/actions submitted or taken by the audited organization and determines if the condition was corrected in an acceptable manner. Once it has been determined that the CAQ has been corrected, the ATL categorizes the condition as a CDA according to the definition below.

CDAs – Isolated deficiencies that do not require a root cause determination or actions to preclude recurrence. 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 not dated (isolated), and one or two individuals that have not completed a reading assignment.

The audit team did not identify any WAP-related CDAs as a result of this audit.

7.0 SUMMARY OF OBSERVATIONS AND RECOMMENDATIONS

During the audit, the audit team may identify potential problems or suggestions for improvement that should be communicated to the audited organization. The audit team members, in conjunction with the ATL, evaluate these conditions and classify them as Observations or Recommendations using the following definitions:

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

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

Once a determination is made, the audit team member, in conjunction with the ATL, categorizes the condition appropriately.

7.1 Observation

SRS/CCP did not have copies of the AK summaries in the new RTR units (Pad 15 and Unit #4), this information was available in the currently approved RTR unit #1. SRS/CCP should ensure that the AK summaries are readily available in each RTR unit. During the audit SRS/CCP placed copies of the AK summary documentation in the new RTR units.

7.2 Recommendations

The following WAP-related Recommendation was provided to SRS and CCP management during the audit:

CCP AK Procedure CCP-TP-005 has not been revised to address the change in WAC Rev. 2.0, effective November 15, 2004, which allows the disposal of polychlorinated biphenyl (PCB)-contaminated waste. It is recommended that the procedure and Attachment 6 be revised to indicate that PCB TRU waste, in the specific forms called

out in the WAC, can now be disposed at WIPP. The implementation of the revised procedure will be verified during the next Re-Certification audit.

8.0 LIST OF ATTACHMENTS

Attachment 1: Personnel Contacted During the Audit and the List of Procedures Audited
Attachment 2: Corrective Action Supporting Documentation
Attachment 3: Objective Evidence
Attachment 4: Audited SRS Document Listing

PERSONNEL CONTACTED DURING THE AUDIT

PERSONNEL CONTACTED DURING AUDIT A-05-01				
NAME	TITLE/ORG	PREAUDIT MEETING	CONTACTED DURING AUDIT	POST AUDIT MEETING
Aegan, Kenneth	NFT - HSG	X	X	X
Barton, Lisa	VE - RTR		X	
Becker, David	CCP- AKE	X	X	
Bolland, Brian	NFT; VE Operator		X	
Bowden, Jerry	VE - RTR		X	
Brashears, John	NDA - MCS		X	
Burn, Melanie	AA for Buddy Fussell		X	
Carlton, Tim	BIL - MCS		X	
Crapse, Bert	DOE-SR; TRU Program Manager	X		X
Cribb, James	SRS		X	
Erpenbach, Jerry	QAM-FW-TRU-ORNL	X	X	
Fisher, Albert J.	CCP QA Manager	X	X	
Fox, Lee	SRS; STR	X	X	X
Freeze, Deborah	WTS/CCP; Training Specialist	X	X	X
Fussell, George (Buddy)	CCP/NFT; VPM	X	X	X
Gillespie, B. M.	NDA - MCS	X	X	
Haar, Dave	CCP Program Manager	X	X	X
Harvill, Joe	CCP - NDA	X	X	
Harrison, Jeff	Wastren/CCP; AKE	X	X	X
Hayes, Charles	Six Sigma – Blackbelt - OBU	X		
Hunt, Paul	SWD Deputy Ops. Manager	X		
Johns-Hughes, Kathy	Six Sigma – Blackbelt - OBU	X		
Johns, Amy	CCP – L&M	X	X	
Johnson, Nikki	VE - RTR		X	
Kaarse, Mike	CCP - NFT		X	
Keller, Janet	MCS – IQ3		X	
Lavallee, Leah	SWO; TCO		X	

PERSONNEL CONTACTED DURING AUDIT A-05-01				
NAME	TITLE/ORG	PREAUDIT MEETING	CONTACTED DURING AUDIT	POST AUDIT MEETING
Ledbetter, Linda	NFT;VE Operator		X	
Leschak, Will	BNFLSW&I QA		X	
Lynn, Kevin	QA - SWI		X	
McCants, Natasha	NFT/CCP; HSG Supervisor	X	X	X
Melton, Jessie	WTS/CCP; CCP HSG SME	X	X	
Miller, Joe	MCS - IPAN		X	
Mobley, James C.	NFT; VEE	X	X	X
Monk, Colleen	Admin - MCS			X
Muse, Steve	CCP/WTS; SPQAO	X	X	
Mussman, William	NDA/IQ3			X
Pearcy, Sheila	CCP/L&M; Lead Records Custodian	X	X	
Pennala, Eric	GM - MCS	X		
Peters, Kevin	Tech Specs/CCP; AKE		X	
Peterson, Tom	CCP; NDA Tech Support	X	X	
Rose, Steve	CCP - SPM	X	X	X
Shepley, Todd	MCS; GM	X	X	
Smith, Barry L.	MCS/CCP; NDA Operator		X	
Smith, E. Lee	CCP MCS RTR-TS/SME	X	X	
Smith, Susan	MCS/CCP/NDE		X	
Steade, Maria	MCS		X	
Stoller-Hardy, Shauna	NFT/CCP; HSG Operator		X	
Stroble, J. R.	WTS/CCP; WCO		X	
Thomason, Rich	MCS; IQ3 TS and ETR	X	X	
Tilmon, Pat	VE - RTR		X	
Tilmon, William	CCP - RTR		X	
Tillman, Richard	SRS/QA; Manager		X	
West, John	BNFL; NDA Expert Analyst	X	X	

Personnel Contacted During the Audit by Area

Nonconformances	A. J. Fisher Steve Muse
Training	Deborah Freeze
Records	Sheila Pearcy
Acceptable Knowledge	David Becker David Haar Jeff Harrison Kevin Peters
Headspace Gas & Gas VOCs Sampling and Analysis	Kenneth Aegan Natasha McCants Jessie Melton Shauna Stotler-Hardy
Real-Time Radiography	Susan J. Smith E. Lee Smith
Visual Examination	Brian Bolland Linda Ledbetter James Mobley
WIPP Waste Information System (WWIS Data Entry)	J. R. Stroble
Waste Certification/Project Level & Data Generation Level Data Validation & Verification	Steve Rose Marsha Webb

LISTING OF AUDITED DOCUMENTS			
	Document No.	**Rev. No.**	**Document Title**
1	CCP-TP-001	10	CCP Project Level Data Validation and Verification
2	CCP-TP-002	13	CCCP Reconciliation of DQOs and Reporting Characterization Data
3	CCP-TP-003	14	CCP Sampling Design and Data Analysis for RCRA Characterization
4	CCP-TP-005	13	CCP Acceptable Knowledge Documentation
5	CCP-TP-007	20	CCP Single Sample Manifold Headspace Gas Sampling and Analysis Procedure
6	CCP-TP-009	13	CCP Single Sample Manifold Data Handling Procedure
7	CCP-TP-011	15	CCP Radiography Inspection Operating Procedure
8	CCP-TP-028	2	CCP Radiographic Test and Training Drum Requirements
9	CCP-TP-029	13	CCP Single-Sample Manifold Headspace Gas Sampling and Analysis Methods and Equipment Calibration
10	CCP-TP-030	12	CCP TRU Waste Certification and WWIS Data Entry
11	CCP-TP-032	11	CCP Single Sample Manifold Data Validation Procedure
12	CCP-TP-035	12	CCP Container Management
13	CCP-TP-053	2	CCP Standard Real-Time Radiography (RTR) Inspection Procedure
14	CCP-TP-056	3	CCP HSG Performance Demonstration Plan
15	CCP-TP-085	1	CCP TVEF Facility Operations
16	CCP-TP-087	0	CCP Scale Operations
17	CCP-TP-088	1	CCP Disposal Program Data Generation Level Review for VE
18	CCP-TP-113	2	CCP Standard Waste Visual Examination
19	CCP-TP-136	0	CCP Standardized Prohibited Item Remediation
20	CCP-TP-145	0	CCP RTR#4 Radiography Inspection Operating Procedure at SRS
21	CCP-PO-001	8	CCP Transuranic Waste Characterization Quality Assurance Project Plan
22	CCP-PO-002	9	CCP Transuranic Waste Certification Plan
23	CCP-PO-004	16	CCP/SRS Interface Document
24			Statement of Work IE8863 for Characterization of SRS TRU Waste
25	CCP-QP-001	2	CCP Graded Approach
26	CCP-QP-002	15	CCP Training and Qualification Plan
27	CCP-QP-005	9	CCP TRU Nonconforming Item Reporting and Control
28	CCP-QP-008	10	CCP Records Management
29	CCP-QP-028	5	CCP Records Filing, Inventorying, Scheduling, and Dispositioning