


Mr. Jerry Wells

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September 2, 2008



cc: w/attachment
A. Holland, CBFO *ED
M. Navarrete, CBFO ED
D. Moody, CBFO ED
D. Gadbury, CBFO ED
N. Castaneda, CBFO ED
C. Fesmire, CBFO ED
D. Haar, WTS/CCP ED
D. Ploetz, WTS/CCP ED
V. Cannon, WTS/CCP ED
A.J. Fisher, WTS/CCP ED
M. Walker, WTS/CCP ED
J. Hoff, WTS ED
W. Lattin, DOE-ID ED
M. Eagle, EPA ED
E. Felcorn, EPA ED
R. Joglekar, EPA ED
S. Ghose, EPA ED
S. Zappe, NMED ED
S. Holmes, NMED ED
D. Winters, DNFSB ED
G. Lyshik, LANL-CO ED
P. Gilbert, LANL-CO ED
R. Garcia, CTAC ED
S. Calvert, CTAC ED
WIPP Operating Record, MS: 452-09
CBFO QA File
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CBFO SURVEILLANCE REPORT

Surveillance Number: S-08-16 **Date of Surveillance:** August 5 – 15, 2008

Surveillance Title: Idaho National Laboratory (INL) Central Characterization Project (CCP) Accelerated Retrieval Project (ARP) Visual Examination and Waste Packaging Activities

Organization: INL/CCP

Surveillance Team: The surveillance team consisted of the following personnel:

Steven D. Calvert	Surveillance Team Leader, CTAC
Rhett Bradford	Surveillance Team Member, CTAC

Surveillance Scope:

The scope of the surveillance was to evaluate the adequacy, implementation, and effectiveness of the CCP technical and quality assurance (QA) activities for remediation and repackaging of Summary Category Group S3000, homogeneous solid waste, conducted at INL by the CCP. This included review of the Packaging Configuration Correction (PCC) process described in Procedure CCP-TP-006, *CCP Visual Examination Technique for INL Newly Generated TRU Waste Retrieved from Pits*.

Surveillance Results:

The surveillance team determined that INL/CCP activities have adequate procedures that are effectively implemented.

Activities Evaluated:

- Personnel training and qualification were reviewed, including the training records of personnel performing visual examination activities. The surveillance team verified that personnel performing specific activities had completed the required training and possessed current qualifications to perform their assigned activities.
- The team conducted a walkthrough of the visual examination area and the waste packaging area.
- Implementation and effectiveness of INL/CCP procedures were reviewed.
- Use of proper revision of each procedure was verified.

Governing Documents/Requirement:

- DOE/CBFO-94-1012, Revision 9, *Quality Assurance Program Document (QAPD)*
- WIPP Hazardous Waste Facility Permit, NM 4890139088-TSDF

Recommendations:

1. It is recommended that all drums that have been returned to CCP after being processed by CH2M-WG Idaho (CWI) using the waste packaging configuration correction method, be radiographed and documented in batch data reports to verify that prohibited items are not present.

Observations:

1. The final disposition for NCR-INL-0001-07 should be updated. The NCR was written to document the excess liquids that were identified in ARP sludge drums. The current disposition does not describe the proposed method of verification to demonstrate that the drum packaging correction process was effective. CCP had not yet implemented the verification portion of the process.
2. The CCP Waste PCC form requires the Visual Examination Operator (VEO) to verify that no prohibited items have been added or are present (question 11 of the form). During a review of the video recordings of the process, it was noted that a significant amount of liquid was in the bottom of one of the drums. No absorbent was added to the bottom of the drum; however, the VEO documented that no prohibited items were present. At the time of this surveillance, the PCC forms had not been independently reviewed and had not been included in the batch data reports.

Conditions Adverse to Quality:

No conditions adverse to quality were identified.

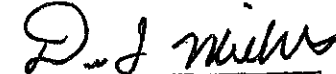
Closed During Surveillance (CDS):

No concerns were closed during the surveillance.

The surveillance team determined that the technical and QA activities for remediation and repackaging of Summary Category Group S3000, homogeneous solid waste, conducted at INL by the CCP were adequate, satisfactorily implemented, and effective.

Surveillance Team Leader: 

Date: 9/2/08

CBFO QA Manager Approval: 

Date: 9/2/08