



Department of Energy
Carlsbad Field Office
P. O. Box 3090
Carlsbad, New Mexico 88221
September 2, 2008



Mr. Jon E. Hoff, Quality Assurance Manager
Washington TRU Solutions
P.O. Box 2078
Carlsbad, NM 88221-2078

Subject: Report for Surveillance S-08-14, Washington TRU Solutions
National Emissions Standards for Hazardous Air Pollutants

Dear Mr. Hoff:

The Carlsbad Field Office (CBFO) conducted a surveillance of Washington TRU Solutions (WTS) National Emissions Standards for Hazardous Air Pollutants (NESHAP) activities August 19 through 21, 2008. The surveillance was conducted in accordance with the Surveillance Plan. The CBFO Surveillance Report for Surveillance S-08-14, WTS NESHAP, is enclosed.

One condition adverse to quality was identified regarding failure to follow procedure and two recommendations for management consideration were made by the surveillance team. The condition adverse to quality was issued under a separate letter as Corrective Action Report 08-038.

If you have any questions or comments concerning the surveillance report, please contact me at (575) 234-7442.

Sincerely,

M. Lea Chism
Quality Assurance Specialist

Enclosure



Mr. Jon E. Hoff

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September 2, 2008

cc: w/enclosure
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R. Garcia, CTAC ED
Thomas Putnam, CTAC ED
WIPP Operating Record, MS 452-09
CBFO QA File S-08-14
CBFO M&RC

*ED denotes electronic distribution

CBFO SURVEILLANCE REPORT

Surveillance Number: S-08-14 Date of Surveillance: August 19-21, 2008

Surveillance Title: National Emission Standards for Hazardous Air Pollutants (NESHAP)

Organization: Washington TRU Solutions (WTS)

Surveillance Team: Lea Chism, Carlsbad Field Office (CBFO) Management Representative

Team Leader: Thomas Putnam, CBFO Technical Assistance Contractor (CTAC)

Team Members: Joe Field, CTAC
Jim Oliver, CTAC

Surveillance Scope: The adequacy, implementation, and effectiveness of WTS NESHAP activities.

Surveillance Results: The surveillance team determined that the WTS NESHAP processes and associated activities were satisfactorily implemented and effective.

Activities Evaluated:

The surveillance was based on the following documents:

- WP 02-EM3004, Rev. 3, *Radiological Data Verification and Validation*
- WP 12-RC.01, Rev. 8, *Quality Assurance Program Plan for Sampling Emissions of Radionuclides to the Ambient Air at the Waste Isolation Pilot Plant*
- WP12-RL1016, Rev. 8, *Operation of the Oxford Series 5XLB Gas Proportional Counter*
- WP 12-RE3004, Rev. 2, *Periodic Confirmatory Sampling Reporting and Compliance Activities*
- WP 12-RL1001, Rev. 8, *Sample Tracking and Custody*
- WP 12-RL3002, Rev. 5, *Radiochemistry Laboratory Data Validation and Verification*
- WP 12-HP3500, Rev. 15, *Airborne Radioactivity*

The following NESHAP activities were evaluated as related to the listed activities:

- Sampling
- Data Compilation
- Reporting

The surveillance team verified the WTS Waste Isolation Pilot Plant (WIPP) NESHAP program to be adequate, effective, and implemented. The team's examination of records found them to be in accordance with procedural requirements, except for Corrective Action Report (CAR) 08-038. The tasks were performed in accordance with procedural requirements.

Entries for samples in the Radiochemistry Sample Tracking Logbook were visually verified for correct entry. Both internal and external chain-of-custody forms were found to be properly documented and consistently used for sample transfers to and from the WIPP site to the Carlsbad Environmental Monitoring and Research Center (CEMRC) WTS Laboratory in Carlsbad. At the laboratory, the chain-of-custody forms were found to be used consistently for internal tracking of multiple movements during the sample analysis process. It was visually verified that the samples are tracked through the Daily Work Log and the Sample Preparation Logbook.

Personnel qualifications and training were confirmed for staff radiological chemist, radiochemistry technician, and radiological technician performing sample collection. Preplanning meetings held prior to the start of off-normal samples to discuss variation from normal analysis work were noted in the sample meeting minutes of 12-4-07, 4-14-2008, and 5-6-2008.

Overall, the NESHAP activities were determined to be adequate, satisfactorily implemented, and effective.

Corrective Actions: The surveillance team identified one condition adverse to quality as a result of the surveillance and provided two Recommendations to WTS management.

Corrective Action Report:

CAR 08-038 - Procedure WP 12-HP3500, Rev. 15, requires information on Attachment 1 to be recorded in whole numbers only for the gross count rate, background count rate, net count rate, and activity in disintegrations per minute. The surveillance team reviewed Attachment 1, dated 8-3-08, and found the information was entered out to two decimal points. A review of other samples found this to be the norm. The equipment used to make calculations carries out the calculations to two decimal points, and the calculations were recorded that way on Attachment 1.

Recommendations:

Recommendation 1: Data sheets should be revised per the following two examples.

Example 1: SDG 1008-199, Section 5, Page 15, "Quality Control Summary," Subsection 5A "Reagent Laboratory Control Sample Summary," columns headed "Aliquot" and "MDC" should include units. This recommendation applies to other similar column headings in other sections.

Example 2: DG 2008-199, Case Narrative, Section 7, Page 8, "Gamma Spectrometer," should indicate that the second box contains calibration information, and columns labeled, "Annual Energy" and "Annual Efficiency" should have more accurate and descriptive labels, such as "Energy Calibration (Annual)" and "Efficiency Calibration (Annual)."

Recommendation 2: Closer attention to detail is needed, as evidenced on WP 12 HP 1305 R5, Page 39 of 39, Attachment 8 – NESHAP Particulate Air Filter Sample Form for Location A13. The form shows a Start Date of 1/15/08 for Air Sample Filter Number A13011508, with a sampling start time of 0846, a sampling stop time of 0959, and a "Run Time (Min)" reported as 113, apparently correctly indicating the run time as 1 hour and 13 minutes, but in incorrect units. Run Time (Min) should be reported as 73 minutes. The handwritten data on this sheet are subsequently entered into a spreadsheet (Filename: StaA 2008.xls) where the Run Time (Min) is correctly reported. An additional records sample was requested for the same form, but documenting Station A33 with a start date of 7/16/08 for Air Sample Filter Number A33071608. The Start Time of 7/16/08 0740 and Stop Time of 7/17/08 0748 were correctly reported, as well as the Run Time (Min) correctly reported as 1448.

Surveillance Team Leader Signature: Thomas Putnam Date: 08-25-08

Assistant Manager/Office Director: N/A Date: N/A

CBFO QA Manager Approval Signature: [Signature] Date: 8/28/08