Mr. D. K. Ploetz
Central Characterization Project
Washington TRU Solutions
P.O. Box 2078
Carlsbad, NM 88221

Subject: Issuance of Audit Report A-08-25, Central Characterization Project

Dear Mr. Ploetz:

The Carlsbad Field Office performed an audit of the Central Characterization Project (CCP) transportation activities August 11 through 14, 2008, at the Skeen-Whitlock Building in Carlsbad, NM. The audit report is enclosed.

No conditions adverse to quality were identified during the audit.

If you have any questions or comments concerning the audit, please contact me at (575) 234-7491.

Sincerely,

Dennis S. Miehls
Senior Quality Assurance Specialist

Enclosure
cc: w/enclosure
A. Holland, CBFO
M. Navarrete, CBFO
N. Castaneda, CBFO
C. Gadbury, CBFO
C. Fesmire, CBFO
J.R. Stroble, CBFO
M. Brown, CBFO
D. Haar, WTS/CCP
L. Porter, WTS/CCP
V. Cannon, WTS/CCP
A. Fisher, WTS/CCP
M. Walker, WTS/CCP
J. Hoff, WTS
M. Mullins, WTS
M. Eagle, EPA
E. Feltcorn, EPA
R. Joglekar, EPA
S. Ghose, EPA
S. Zappe, NMED
S. Holmes, NMED
T. Kesterson, DOE OB WIPP NMED
D. Winters, DNFSB
G. Lyshik, LANL-CO
P. Gilbert, LANL-CO
B.J. Verret, CTAC
R. Garcia, CTAC
A. Pangle, CTAC
WIPP Operating Record, MS 452-09
CBFO QA File
CBFO M&RC
*ED denotes electronic distribution
U.S. DEPARTMENT OF ENERGY
CARLSBAD FIELD OFFICE

AUDIT REPORT

OF THE

CENTRAL CHARACTERIZATION PROJECT (CCP)
ALL SITES TRANSPORTATION ACTIVITIES FOR CONTACT-HANDLED
(CH) AND REMOTE-HANDLED (RH) TRANSURANIC (TRU) WASTE

CARLSBAD, NEW MEXICO

AUDIT NUMBER A-08-25

AUGUST 11 – 14, 2008

Prepared by: William J. Vefret, CTAC
Audit Team Leader

Approved by: Ava Holland, CBFO
Quality Assurance Manager

Date: 9/3/08

Date: 9-3-08
1.0 EXECUTIVE SUMMARY

Carlsbad Field Office (CBFO) Audit A-08-25 was conducted to evaluate the adequacy, implementation, and effectiveness of transportation activities performed under the Central Characterization Project (CCP) Program.

The evaluation included CCP activities related to transportation activities performed by CCP at Los Alamos National Laboratory (LANL), Savannah River Site (SRS), Idaho National Laboratory (INL), and Oak Ridge National Laboratory (ORNL).

The audit was conducted in Carlsbad, New Mexico, August 11 through 14, 2008. The audit team concluded that overall, the CCP technical procedures are adequate relative to the flow-down of requirements from the CBFO Quality Assurance Program Document (QAPD), the TRUPACT-II Safety Analysis Report, TRUPACT-II Authorized Methods for Payload Control (TRAMPAC), and the TRUPACT-II Certification of Compliance, NRC 71-9281.

The audit team concluded that the CCP transportation activities evaluated are being satisfactorily implemented and are effective.

The audit team also concluded that the CCP Quality Assurance (QA) program activities related to transportation are being implemented satisfactorily and are effective relative to the CBFO QAPD.

No conditions adverse to quality (CAQ) were identified during this audit. No Observations were identified. No Recommendations were offered for management consideration.

2.0 SCOPE AND PURPOSE

2.1 Scope

The audit evaluated the implementation and effectiveness of CCP plans and procedures related to waste transportation activities for shipment of transuranic (TRU) waste to the Waste Isolation Pilot Plant (WIPP). The team reviewed documentation and conducted personnel interviews to determine adequacy, implementation, and effectiveness of the following technical and quality assurance (QA) processes related to the shipment of TRU waste:

- Packaging operations, waste certification, and shipping activities
- Approved procedures, including documentation of activities required by procedures
- Personnel qualification and training
- Records
• Document preparation, approval, and control
• Nonconformances, corrective actions, and corrective action management
• Surveillances and assessments
• Procurement
• Measuring and test equipment
• Data analysis and trending
• Lessons learned
• Inspection control
• Test control
• Conduct of operations
• Leak testing
• Payload loading
• Quality assurance oversight
• Shipping papers
• WIPP Waste Information System (WWIS) data entry
• Gas generation testing
• Flammable gas analysis

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

• **CBFO Quality Assurance Program Document (QAPD), DOE/CBFO-94-1012**
• **TRUPACT-II Safety Analysis Report, TRUPACT-II Authorized Methods for Payload Control (TRAMPAC), and the TRUPACT-II Certification of Compliance, NRC 71-9281**
• **CH Packaging Program Guidance, DOE/WIPP 02-3183**
• **CH Packaging Operations Manual, DOE/WIPP 02-3184**
• **CH Packaging Maintenance Manual, DOE/WIPP 02-3185**
• **CH Packaging Operations for High Wattage Waste, DOE/WIPP 02-3220**
• **Standard Waste Box Handling and Operations Manual, WP 08-PT.01**
• **Ten-Drum Overpack Handling and Operations Manual, WP 08-PT.02**
• **CH Packaging Trailer O&M Manual, WP 08-PT.04**
• RH Packaging Program Guidance, DOENVIPP 02-3283
• RH Packaging Operations Manual, DOENVIPP 02-3284
• RH Packaging Maintenance Manual, DOENVIPP-02-3285
• RH TRU 72-B Cask Uprighting Trailer Operations and Maintenance Manual, WP 08-PT.13
• Waste Isolation Pilot Plant Flammable Gas Analysis, DOENVIPP 06-3345
• Quality Assurance Program Plan for TRUPACT-II Gas Generation Test Program, DOENVIPP 01-3187
• CCP Implementing Procedures

2.2 Purpose

Audit A-08-25 was conducted to evaluate the adequacy, implementation, and effectiveness of technical and QA processes related to the CCP program.

3.0 AUDIT TEAM

William J. Verret  
Audit Team Leader, CBFO Technical Assistance Contractor (CTAC)

Paul Gomez  
Auditor, CTAC

George Gula  
Auditor, CTAC

Tommy Putnam  
Auditor, CTAC

4.0 AUDIT PARTICIPANTS

The individuals at CCP who were present at the pre-audit and post-audit meetings and who were contacted during the audit are identified by area of responsibility in Attachment 1. A pre-audit meeting was held at the Skeen-Whitlock Building in Carlsbad, New Mexico, on August 11, 2008. The audit was concluded with a post-audit meeting held at the Skeen-Whitlock Building in Carlsbad, New Mexico, on August 14, 2008.

5.0 SUMMARY OF AUDIT RESULTS

5.1 Program Adequacy, Implementation, and Effectiveness

The audit team concluded that the applicable CCP transportation activities, as described in the associated CCP implementing procedures, are adequate, satisfactorily implemented, and effective in meeting the requirements of the HWFP. Audit activities, including objective evidence reviewed, are described below. Attachment 2 contains the Summary Table of Audit Results. Attachment 3 contains a listing of CCP procedures
that implement the appropriate TRAMPAC, QAPD, flammable gas testing and gas generation testing requirements.

The audit team concluded that the CCP QA program as related to transportation is satisfactorily implemented and effective.

5.2 Quality Assurance Activities

Approved Procedures (including document preparation, approval, and control)

CCP personnel who perform work under the CCP Transportation Program are required to work to the CCP program procedures. When these personnel are notified of changes to program procedures, they perform reviews and provide comments on the procedures in accordance with CCP-QP-010, CCP Document Preparation, Approval and Control. The audit team verified that changes or revisions to transportation-related documents are reviewed and approved prior to approval of procedures, DOE/CBFO is notified of changes, obsolete procedures are approved for cancellation and removed from use, and records of procedure changes or revisions are handled per procedure CCP-QP-008, CCP Records Management.

The audit team concluded that the requirements governing the procedures process (CBFO QAPD Section 1.5) were adequately addressed, satisfactorily implemented, and effective.

Personnel Qualification and Training

CCP personnel who perform transportation work under the CCP Program are trained and qualified to WIPP requirements in accordance with CCP-QP-002, CCP Training and Qualification Plan. Qualifications and training records, including qualification cards and certifications, were reviewed for helium leak test personnel, flammable gas test personnel, and waste certification personnel. Task lists of required training elements were verified to be compliant and properly used.

The audit team concluded that the requirements governing personnel qualification and training processes (CBFO QAPD Section 1.2) were adequately addressed, satisfactorily implemented, and effective.

Records

CCP personnel transmit records generated during the performance of transportation activities to CCP Records, in accordance with CCP-QP-008, CCP Records Management, and CCP-QP-028, CCP Records Filing, Inventorying, Scheduling, and Dispositioning. All records are controlled by CCP. CCP personnel have access to CCP records in case corrections to QA records are needed. The audit team verified that the CCP Lead Records Custodian completes a Records Inventory Work Sheet for each
transportation-related record, that Records Inventory and Disposal activities are properly performed, and that records are produced, collected, corrected, and maintained in accordance with the procedure.

The audit team concluded that the requirements governing the records process (CBFO QAPD Section 1.5) were adequately addressed, satisfactorily implemented, and effective.

Nonconformances, Corrective Actions and Corrective Action Management

CCP personnel who identify deficiencies or nonconformances that affect transportation activities ensure that nonconformance reports (NCRs) and corrective action reports (CARs) are generated in accordance with CCP-QP-005, CCP TRU Nonconforming Item Reporting and Control, and CCP-QP-006, CCP Corrective Action Reporting and Control. Although there were no transportation-related nonconformances identified or issued in 2008, the audit team reviewed transportation NCR CCP-0500-07 from 2007 for this audit. The audit team verified that CCP has an NCR numbering and logging system that is satisfactory, the NCR processing is properly done, NCRs are closed per procedure, and NCRs are satisfactorily handled as QA records. Corrective action reporting activities are performed by a CCP CAR Coordinator, who creates and maintains a CAR log and a CAR Module (CARM), and performs CAR log activities according to procedure. The only transportation-related CAR issued in 2008, CAR-0008-08, is in process. This CAR was verified to be compliant up to the date of the audit.

CCP performs transportation corrective action management activities using Procedure CCP-QP-004, CCP Corrective Action Management. Corrective action activities were assessed by review of documentation and personnel interviews. No transportation NCRs were issued in 2008. For audit purposes, NCR CCP-0500-07 from 2007 was evaluated. CAR-0008-08 was evaluated during this audit, but was not closed as of the audit date. For the audited CAR, it was verified that significant conditions adverse to quality were being screened by CCP QA in accordance with the requirements and that appropriate Trend Codes were entered. The audit team verified that the CAR contained a deficiency evaluation per the procedure. The CAR had not been completed, therefore a corrective action plan (CAP) for the CAR was not verified. For the NCR reviewed, the audit team verified that the CCP QA had reviewed the NCR for significant and recurring conditions adverse to quality during trend reporting.

The audit team concluded that the requirements governing the nonconformances, corrective actions and corrective action management processes (CBFO QAPD Section 1.3) were adequately addressed, satisfactorily implemented, and effective.

Surveillance and Assessments

The implementation verification of surveillances and assessments was conducted during the CCP audit. CCP performs surveillances and assessments using Procedures
CCP-QP-021, CCP Surveillance Program, and CCP-QP-018, CCP Management Assessment. The audit team verified that surveillances performed by CCP on the transportation program were planned and submitted to the CCP QA Manager for concurrence; that the surveillance lead conducted the surveillance, reported the results, and performed follow-up activities as required; that the surveillance team performed surveillance and assessment activities per procedure requirements; and that a Surveillance Master Log is properly maintained. The audit team verified that CCP managers are periodically conducting transportation management assessments, the reports are prepared and signed by the Assessment Leader and submitted to the Site Project Manager (SPM) as required, QA review is performed and signed, and that management assessments are being properly managed as QA records.

The audit team concluded that the requirements governing surveillances and assessments (CBFO QAPD Section 3) were adequately addressed, satisfactorily implemented, and effective.

Procurement

The implementation of transportation-related procurement activities was performed during this audit. CCP performs procurement activities using Procedure CCP-QP-015, CCP Procurement. The audit team verified that a Graded Approach Database is being used for the Quality Level items, that measuring and test equipment is graded as Quality Level I, procurement document PO409998 was complete, and that receipt inspection verification is being performed as required, including examination of National Institute of Science and Technology (NIST) certificate of conformance/analysis (when required). The audit team verified that CCP QA is involved in the approval of transportation-related purchase requisitions; that procurement documentation packages are prepared, reviewed, and approved; and that procurement documents are maintained as QA records per CCP-QP-008, CCP Records Management.

The audit team concluded that the requirements governing procurement (CBFO QAPD Section 2.3) were adequately addressed, satisfactorily implemented, and effective.

Measuring and Test Equipment (M&TE)

The audit team verified the QAPD requirements for the control of measuring and test equipment (M&TE). The audit team verified that CCP maintains a master database of monitoring and data collection containing complete records of transportation M&TE, that documentation of current and past measuring and testing equipment utilized for transportation activities is acceptable. Instrument numbers were noted and then verified against the CCP M&TE listing. CCP M&TE activities are governed by Procedure CCP-QP-016, CCP Control of Measuring, Testing, and Data Collection Equipment.
The audit team concluded that the requirements governing the M&TE process (CBFO QAPD Section 2.4.5) were adequately addressed, satisfactorily implemented, and effective.

Data Analysis and Trending

Data analysis and trending activities related to transportation activities were assessed. The audit team verified that trending for the semi-annual reports are compiled and provided to CBFO QA following approval by CCP management. The trend report for INL covering mid 2007 to the end of 2007 was examined and all required elements were present and acceptable. Data analysis and trending activities performed by CCP are regulated by Procedure CCP-QP-014, CCP Data Analysis and Trending.

The audit team concluded that the requirements governing data analysis and trending (CBFO QAPD Section 1.3) were adequately addressed, satisfactorily implemented, and effective.

Lessons Learned

Lessons learned activities for transportation activities were audited by review of lessons learned documentation produced by CCP. CCP conducts Lessons Learned briefings, including briefing numbers 2008-13, 2008-14, and 2008-15, which were evaluated by the audit team. CCP maintains a database and hardcopy files of lessons learned, as required. CCP implements lessons learned activities using Procedure CCP-QP-025, CCP Lessons Learned.

The audit team concluded that the requirements governing lessons learned (CBFO QAPD Section 1.1) were adequately addressed, satisfactorily implemented, and effective.

Inspection Control

Transportation-related inspection control activities were verified via document review and personnel interviews. The audit team concluded that inspection documentation contained all required elements, was completed per procedure, and was reviewed and approved; personnel performing Inspection Control were adequately trained; and records of inspection control were maintained properly. CCP uses Procedure CCP-QP-026, CCP Inspection Control, to govern all activities related to inspection control.

The audit team concluded that the requirements governing inspection control (CBFO QAPD Sections 2.1 and 2.3) were adequately addressed, satisfactorily implemented, and effective.
Test Control

Test control activities of transportation-related activities were assessed using document review and personnel interviews. Procedure CCP-QP-027, CCP Test Control, is used to implement these activities.

No transportation-related test control activities have been performed; therefore this activity was not applicable (N/A) to this audit.

Conduct of Operations

Conduct of operations activities for transportation activities covered under Procedure CCP-PO-005, CCP Conduct of Operations, were evaluated by document review and personnel interviews. The audit team verified that standing orders supplementing procedures were incorporated into the procedures upon revision, the electronic Standing Order Index was acceptable, the VPM Quarterly Standing Order Review was completed appropriately, CCP-SO-343 followed the required format, and that CCP transportation personnel required reading was noted on qualification cards.

The audit team concluded that the requirements for conduct of operations (CBFO QAPD Section 1.1) were adequately addressed, satisfactorily implemented, and effective.

Quality Oversight

Quality oversight activities for transportation are performed using CCP-QP-018, CCP Management Assessments, and are covered in the surveillances and assessments portion of this report. The audit team verified that section 5 of CCP-PO-002, CCP Transuranic Waste Certification Plan, fulfills the requirements for a transportation QA plan as required by Title 10, Code of Federal Regulations (CFR), Part 71 (10 CFR 71) Subpart H.

5.3 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 TRAMPAC and packaging documents is cited briefly, and the result of the assessment is provided.

Objective evidence to evaluate the implementation of the associated transportation activities was selected and reviewed. Shipping batch data reports (BDRs), transportation records, and training documentation for CCP personnel evaluated to ensure compliance to the TRAMPAC. Flammable gas BDRs and gas generation BDRs were examined to ensure compliance to Waste Isolation Pilot Plant Flammable Gas Analysis, DOE/WIPP 06-3345, and the Quality Assurance Program Plan for TRUPACT-II Gas Generation Test Program, DOE/WIPP 01-3187.
The CCP provided the following BDRs:

- Shipping BDRs: INL IN080254, IN08196, INR08012, INR08061; LANL LA080013, LA080025; SRS SR080004, SR080064
- Flammable gas BDRs: INL IN08FG1051, IN08FG1115, IN08FG1089-ICAL, IN08FG1010-MDL; LANL LA08FG2060, LA08FG2027, LA08FG2002MDL, LA08FG2050ICAL; SRS SR08FG3034, SR08FG3108, SR08FG3075, SR08FG3103; ORNL OR08FG4006, OR08FG4001-ICAL, OR08FG4002-MDL
- Gas Generation BDRs: INL INGGT080001, INGGT080008, ICALMDL073007-MGSS-01, ICALMDL071607-MGSS-02

The audit team evaluated these BDRs and found them to be acceptable.

**Packaging Operations, Waste Certification, and Shipping Activities**

The audit team evaluated the following DOE and CCP technical procedures that CCP uses in controlling transportation activities:

- TRAMPAC
- DOE/WIPP 02-3183, CH Packaging Program Guidance
- DOE/WIPP 02-3184, CH Packaging Operations Manual
- DOE/WIPP 02-3185, CH Packaging Maintenance Manual
- DOE/WIPP 02-3283, RH Packaging Program Guidance
- DOE/WIPP 02-3284, RH Packaging Operations Manual
- DOE/WIPP 02-3220, CH Packaging Operations for High Wattage Waste
- WP 08-PT.01, Standard Waste Box Handling and Operations Manual
- WP 08-PT.02, Ten-Drum Overpack Handling and Operations Manual
- WP 08-PT.04, CH Packaging Trailer O&M Manual
- WP 08-PT.13, RH TRU 72-B Cask Uprighting Trailer Operations and Maintenance Manual
- DOE/WIPP 06-3345, Waste Isolation Pilot Plant Flammable Gas Analysis
- DOE/WIPP 01-3187, Quality Assurance Program Plan for TRUPACT-II Gas Generation Test Program
- CCP-TP-030, CCP CH TRU Waste Certification and WWIS Data Entry
- CCP-TP-033, CCP Shipping of TRU Waste
Objective evidence was reviewed to ensure transportation-related activities were adequately performed. BDRs were evaluated based on procedure requirements for packaging, certification, and shipment.

The audit team concluded that the transportation activities for packaging operations, waste certification, and shipping activities were adequately addressed, satisfactorily implemented, and effective.

**Leak Testing**

The audit team examined the shipping BDRs helium leak testing information to verify that leak testing activities were performed as required and that the results were acceptable. Training of leak test personnel was evaluated by review of training files and qualification cards.

The audit team concluded that the leak test activities were adequate, satisfactorily implemented, and effective.

**Payload Loading**

Payload loading activities were verified during the examination of the shipping BDRs.

The audit team concluded that the payload loading activities were adequate, satisfactorily implemented, and effective.

**Shipping Papers**

Shipping papers that were included as part of the shipping BDRs were examined and found to be complete and acceptable.
The audit team concluded that the shipping paper activities were adequate, satisfactorily implemented, and effective.

**WWIS Data Entry**

Interviews were conducted with the CCP Waste Certification Official (WCO) and the CCP Waste Certification Assistant (WCA). The WCO and WCA provided demonstrations of WWIS data entry and retrieved WWIS data which verified WWIS data entry was being acceptably performed. Training of the WCO and WCA was verified as compliant.

The audit team concluded that the WWIS data entry activities were adequate, satisfactorily implemented, and effective.

**Gas Generation Testing**

Gas generation BDRs were examined from work performed at INL (the only CCP site performing gas generation work). Initial calibration (ICAL) studies were reviewed, minimum detection limit (MDL) studies were verified, and gas generation BDRs were audited for compliance and completeness. All areas were found to be acceptable. Training was verified for gas generation operators and independent technical reviewers (ITRs), and long-term data reporting was evaluated through examination of training records.

The audit team concluded that the gas generation activities were adequate, satisfactorily implemented, and effective.

**Flammable Gas Analysis**

Flammable gas (FG) analysis was audited by examination of FG BDRs produced at LANL, INL, SRS, and ORNL. Training of FG operators and ITRs was verified through examination of training records. ICAL work and MDL work were verified via examination of ICAL and MDL BDRs.

The audit team concluded that the flammable gas analysis activities were adequate, satisfactorily implemented, and effective.

The audit team did not identify any CAQs during the audit and concluded that CCP transportation technical processes are adequate, satisfactorily implemented, and effective.

6.0 **CORRECTIVE ACTIONS, OBSERVATIONS, AND RECOMMENDATIONS**

6.1 **Corrective Action Reports**

During the audit, the audit team may identify conditions adverse to quality (CAQs) and document them 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, regulatory compliance demonstration, or the effective implementation of the QA program.

No CAQs were issued as a result of this audit.

6.2 Deficiencies Corrected During the Audit

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

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 can, therefore, be a 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 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.

No CDAs were issued as a result of this audit.

6.3 Observations

During the audit, the audit team may identify potential problems 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 using the following definition:

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

No Observations were presented to CCP management as a result of this audit.
6.4 Recommendations

During the audit, the audit team may develop 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 Recommendations, using the following definition:

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

No Recommendations were provided to CCP management as a result of the audit.

7.0 LIST OF ATTACHMENTS

Attachment 1: Personnel Contacted During the Audit
Attachment 2: Summary Table of Audit Results
Attachment 3: Listing of Audited CCP Procedures
<table>
<thead>
<tr>
<th>NAME</th>
<th>TITLE/ORG</th>
<th>PREAUDIT MEETING</th>
<th>CONTACTED DURING AUDIT</th>
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<td>Walker, Mak</td>
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## Summary Table of Audit Results

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## Listing of Audited CCP Procedures

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<th>Document No.</th>
<th>Document Title</th>
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<tr>
<td>1. CCP-PO-002, Rev. 20</td>
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