



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

October 24, 2008



Mr. J. E. Hoff
Washington TRU Solutions, LLC
P.O. Box 2078
Carlsbad, NM 88221



Subject: Surveillance Report S-09-01, WTS Mine Safety

Dear Mr. Hoff,

The Carlsbad Field Office (CBFO) conducted a surveillance of Washington TRU Solutions (WTS) Mine Safety at the Waste Isolated Pilot Plant site during the period of October 14-16, 2008. With the exception of the concerns noted in the enclosed report, the surveillance team concluded that the portion of the WTS program supporting safe mine operations is adequate and satisfactorily effective.

The surveillance resulted in the identification of two corrective action reports (CARs) and one Recommendation. The CARs were previously transmitted to you under a separate cover letter.

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

Sincerely,

M. Lea Chism
Quality Assurance Specialist

Enclosure




Mr. J. E. Hoff

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October 24, 2008

cc: w/enclosure



| | |
|------------------------------------|------|
| A. Holland, CBFO | * ED |
| D. Miehs, CBFO | ED |
| M. Navarrete, CBFO | ED |
| G. Basabilvazo, CBFO | ED |
| F. Sharif, WTS | ED |
| M. Mullins, WTS | ED |
| M. Eagle, EPA | ED |
| E. Feltcorn, EPA | ED |
| R. Joglekar, EPA | ED |
| S. Ghose, EPA | ED |
| S. Zappe, NMED | ED |
| S. Holmes, NMED | ED |
| T. Kesterson, DOE OB WIPP NMED | ED |
| C. Timm, Pecos Management Services | ED |
| D. Winters, DNFSB | ED |
| R. Garcia, CTAC | ED |
| A. Pangle, CTAC | ED |
| B. Pace, CTAC | ED |

RCRA Operating Record, MS: 452-09

CBFO QA File

CBFO M&RC

*ED denotes electronic distribution

CBFO SURVEILLANCE REPORT

Surveillance Number: S-09-01 **Date of Surveillance:** October 14 – 16, 2008

Surveillance Title: Mine Safety

Organization: Washington TRU Solutions LLC (WTS)

Surveillance Team:

| | |
|--------------------|---|
| Berry D. Pace | Team Leader, Carlsbad Field Office (CBFO), Technical Assistance Contractor (CTAC) |
| M. Lea Chism | Management Representative, CBFO Quality Assurance |
| Kirk Kirkes | Team Member, CTAC |
| Paul Gomez | Team Member, CTAC |
| Priscilla Martinez | Team Member, CTAC |
| Veronica Waldram | Team Member, CTAC |
| Don Galbraith | Observer, CBFO Office of Site Operations |

Purpose

This surveillance was performed to evaluate the degree of adequacy and implementation of the requirements established to support safe mine operations at the Waste Isolation Pilot Plant (WIPP).

Scope

The scope of this surveillance included a comprehensive review and comparison between applicable upper-tier requirements documents and established program plans and procedures for an adequacy determination. Personnel interviews, reviews of selected documentation/records, and observance of related activities were performed to determine the effective implementation of associated requirements.

Basis

The surveillance was based on the applicable requirements specified in current revisions of the following governing documents:

- DOE/CBFO-94-1012, Quality Assurance Program Document
- WIPP Hazardous Waste Facility Permit (HWFP)
- WP 13-1, WTS Quality Assurance Program Description
- Selected WTS implementing procedures established to support safe mine operations

Activities Evaluated:

For consistency with the surveillance plan, checklists were developed based on applicable requirements and used to guide team members during the surveillance activities. Specific details and results of interviews and document reviews are noted in the completed checklists and/or associated surveillance forms.

Current versions of the following WTS program procedures and the activities prescribed by each, including the resulting records, were evaluated during the course of the surveillance. Those activities being performed during the surveillance were observed as they were performed.

- WP 04-AD3013, Underground Access Control
- WP 04-AU1007, Underground Openings Inspections
- WP 04-AU1027, Underground Diesel Engine Emissions Test Request Tag
- WP 04-VU1001, Surface Underground Ventilation and Filtration System Operation
- WP 04-VU1002, Operability Testing of Underground Filtration
- WP 04-VU1608, Underground Ventilation and Filtration System Operation
- WP 04-VU1612, WIPP Mine Ventilation Rate Monitoring
- WP 12-FP3003, Combustible Loading Controls for the Waste Handling Building and Underground
- PM041012, Underground Ventilation Exhaust Fan Motors
- PM041026, Underground Exhaust Fans 41-B-700 A & B
- PM041027, Underground Exhaust Fans 41-B-700 A & B
- PM041042, Underground Exhaust Fans 41-B-860 A, B, & C
- PM041154, In-Place Testing of HEPA Filter Units
- PM041166, Underground Exhaust Fan 41-B-700 C
- PM 041167, Underground Exhaust Fan 41-B-700 C
- PM074027, Quarterly Diesel Emissions Test
- PM074061, U/G Diesel Equipment, 100 Hour, Inspection and Maintenance
- PM074063, Drain and Refill Coolant System on U/G Mobile Equipment
- PM074084, Underground Rescue Vehicle
- PM074088, Simon Aerial Work Platform 100 Hours and 500 Hours Inspection and Maintenance 74-U-603 and 75-H-031
- PM074117, U/G Ambulance, 74-Q-012, Annual Inspection and Maintenance

During evaluations of the activities and resulting documentation/records associated with WP 04-AD3013, Underground Access Control, the surveillance team identified a condition adverse to quality related to Attachments 5, 7 and 9 of the procedure (reference CAR 09-002). The surveillance team was unable to verify that these attachments are being maintained as records as required, nor could they be identified on the U/G Operation's records inventory and disposition schedule (RIDS).

Attachment 5, entitled "Thirty-Day Underground Access Permit", is used in conjunction with the authorization granted on Attachment 1, entitled "Underground Activities Worksheet". Attachment 1 provides a listing of trained/qualified personnel that are authorized to enter the mine. Attachment 5 is then completed and issued to the authorized personnel, which then serves as a visual aid to the mine shaft-tender for confirming that the individual seeking entrance into the mine has been appropriately authorized. Attachment 7, entitled "Logbook for Active Waste Disposal Panel Exhaust Drift" is used to aid in accounting for personnel that are in the exhaust drift on any given day should a mine evacuation be necessary. Attachment 9, entitled "Equipment Requirements Checklist for Operation within 100 Feet of Waste" is used to ensure compliance with certain Technical Safety Requirements (TSR) specified in the WIPP

Documented Safety Analysis (DSA). The surveillance team also noted that WP 04-AD3013 does not provide any direction for the use and completion of Attachment 9.

During the review of the records associated with WP 04-AU1007, Underground Openings Inspections, the surveillance team identified a condition adverse to quality related to completion of Attachment 1, entitled "Underground Openings Inspection Checklist" (reference CAR 09-003). This checklist, comprised of six pages, is used to guide and document weekly/annual inspections for various locations within the mine. During the review of checklists completed since June 2008, the surveillance team noted numerous record entry errors related to accuracy, corrections, and missing information where required. In one instance a checklist documents a weekly inspection as having commenced on June 16, 2008, and concluding on June 17, 2008. However, three entries for certain inspection points note dates of July 17, 2008. This same checklist included a number of inappropriate record corrections, such as cross-outs, over-writes and obliteration of text, without the initials and date of the individual making the corrections. In another instance, a checklist was observed lacking the signature of the individual performing the inspection and the designation as whether the inspection was weekly or annual. Although the types of recording errors and issues observed demonstrate noncompliance with record generation requirements, the nature of the errors do not adversely affect the inspection results.

During review of the summary report form used to document mine ventilation rate data collection in accordance WP 04-VU1612, WIPP Mine Ventilation Rate Monitoring, the surveillance team noted a minor inconsistency in terminology used between the example of the form provided in the procedure (Attachment 3) and the actual form used (reference Recommendation #1). Mine ventilation rate monitoring is performed to demonstrate compliance with the WIPP HWFP requirement for maintaining a minimum running annual average mine ventilation exhaust rate of 260,000 standard cubic feet per minute. The actual form used includes three columns for presenting the collection of data in cumulative rolling averages for the current week, past six-weeks and past fifty-two weeks. The example form in the procedure identifies the three columns previously mentioned as weekly, monthly, and annually. In order to provide consistency, it is recommended that either form be revised to agree with each other.

Conclusion:

With the exception of the concerns detailed below, the results of the surveillance conclude that the portions of the WTS program and procedures supporting safe mine operations are adequate for compliance with upper-tier requirements and effectively implemented.

Concerns:

The following details the concerns and their associated classifications that were identified during the course of the surveillance. Two of the concerns involve conditions adverse to quality and were documented on corrective action reports (CARs), which were transmitted to WTS under a separate cover letter.

CAR 09-002

Condition Adverse to Quality

Attachments 5, 7, and 9 in WP 04-AD3013, "Underground Access Control", Revision 22 are not being maintained as records in accordance with the record requirements specified in WP 15-PR, WIPP Records Management Program.

Requirement

WP 15-PR, WIPP Records Management Program, Revision 10, Section 2.1: "Line management will; ensure that records are retained in accordance with retention requirements and not inadvertently or prematurely destroyed...ensure that the organization's Records Inventory and Disposition Schedule (RIDS) is current and that it will be reviewed and resubmitted for approval."

CAR 09-003

Condition Adverse to Quality

Underground Openings Inspection Checklists (Attachment 1) are not being accurately completed. Examples include numerous instances of missing information, dates not recorded or inaccurately recorded, missing signatures, and inappropriate methods of correcting records.

Requirement

WP 04-AU1007, "Underground Openings Inspection", Revision 7, Section(s) 1, 2, & 3 and Attachment 1 "Underground Openings Inspection Checklist"

WP 15-PR, WIPP Records Management Program, Revision 10, Section 3.2; "Records generators will: ensure that records are complete" and Section 5.1; "All records will be inspected for errors...errors will be corrected by drawing a single line through the incorrect information (leaving the original text readable), entering the correct information, and initialing and dating the correction.

Recommendation #1

Mine ventilation rate monitoring is performed to demonstrate compliance with the WIPP HWFP requirement for maintaining a minimum running annual average mine ventilation exhaust rate of 260,000 standard cubic feet per minute. The actual form used includes three columns for presenting the collection of data in cumulative rolling averages for the current week, past six-weeks and past fifty-two weeks. The example form in the procedure identifies the three columns previously mentioned as weekly, monthly, and annually. In order to provide consistency, it is recommended that either form be revised to agree with each other.

Surveillance Team Leader:  Date: 10/20/08
Berry D. Face

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

CBFO QA Manager Approval:  Date: 10-24-08