

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

JUN 22 2010

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



Subject: Transmittal of Audit Report for Audit A-10-20

Dear Mr. Hoff:

The Carlsbad Field Office (CBFO) performed Audit A-10-20 of the Washington TRU Solutions (WTS) Monitoring Programs on May 10-13, 2010. The audit team concluded that the overall status of the WTS Monitoring Programs is adequate, satisfactorily implemented, and effective. One concern was identified during the audit that resulted in Corrective Action Report (CAR) 10-035. This CAR was transmitted under separate cover. The details and conclusions of the audit are provided in the enclosed audit report.

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

Sincerely,

M. Lea Chism
 Quality Assurance Specialist

Enclosure

cc: w/enclosures

- | | | | |
|----------------------|-----|-------------------------------------|----|
| A. Holland, CBFO | *ED | R. Lee, EPA | ED |
| H. Budweg, CBFO | ED | S. Zappe, NMED | ED |
| G. Basabilvazo, CBFO | ED | S. Holmes, NMED | ED |
| S. McCauslin, CBFO | ED | R. Maestas, NMED | ED |
| D. Ferguson, CBFO | ED | T. Kesterson, DOE OB WIPP NMED | ED |
| F. Sharif, WTS | ED | D. Winters, DNFSB | ED |
| M. A. Mullins, WTS | ED | P. Gomez, CTAC | ED |
| M. Eagle, EPA | ED | WIPP Operating Record | ED |
| E. Feltcorn, EPA | ED | CBFO QA File | |
| R. Joglekar, EPA | ED | CBFO M&RC | |
| S. Ghose, EPA | ED | *ED denotes electronic distribution | |



**U.S. DEPARTMENT OF ENERGY
CARLSBAD FIELD OFFICE**

AUDIT REPORT

OF

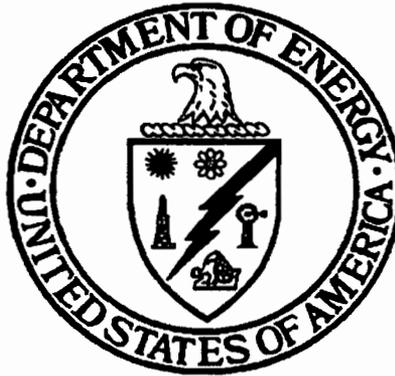
WASHINGTON TRU SOLUTIONS LLC (WTS)

CARLSBAD, NEW MEXICO

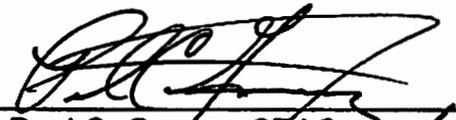
AUDIT NUMBER A-10-20

May 10 – 13, 2010

WTS MONITORING PROGRAMS



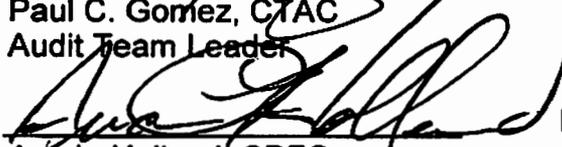
Prepared by:


Paul C. Gomez, CTAC
Audit Team Leader

Date:

6/3/10

Approved by:


Ava L. Holland, CBFO
Director, Quality Assurance

Date:

6/22/10

1.0 EXECUTIVE SUMMARY

Carlsbad Field Office (CBFO) Audit A-10-20 was conducted to evaluate the continued adequacy and implementation of the Washington TRU Solutions LLC (WTS) Quality Assurance (QA) Program related to the WTS Monitoring Programs.

The purpose of the evaluation was to verify the flow-down of upper-tier requirements through the CBFO *Quality Assurance Program Document (QAPD)* and the WTS *Quality Assurance Program Description (WTS QAPD)* into applicable WTS implementing procedures, and to determine if the procedures were effective. The audit was conducted at WTS facilities at the Waste Isolation Pilot Plant (WIPP) and the Carlsbad Environmental Monitoring and Research Center (CEMRC) Building, May 10 – 13, 2010.

The audit team concluded that overall, the WTS Monitoring Programs and implementing procedures are adequate relative to the flow-down of requirements from upper-tier documents. The audit team also concluded that the requirements are being satisfactorily implemented through WTS procedures. In addition, the audit team concluded that overall, the monitoring programs are effective.

As described in section 6, six concerns were identified during the audit, including one condition adverse to quality (CAQ) documented in Corrective Action Report (CAR) 10-035. Three Observations and two Recommendations were also identified.

2.0 SCOPE AND PURPOSE

2.1 Scope

The audit team evaluated the adequacy, implementation, and effectiveness of selected monitoring processes related to the WTS QA Program. The following criteria were evaluated:

- Organization
- Quality Assurance Program
- Training
- Records
- VOC/H₂/Methane Monitoring
- Groundwater Monitoring
- Delaware Basin
- Biotic/Vegetation/Surface Water-Sediment-Soil Sampling/Water Quality Monitoring and Environmental Monitoring and Hydrology (EM&H) Field Work

3.0 AUDIT TEAM AND OBSERVERS

Paul C. Gomez	Audit Team Leader, CBFO Technical Assistance Contractor (CTAC)
Lea Chism	CBFO Management Representative
Tammy Bowden	Auditor, CTAC
Ava Holland	Auditor, CBFO
Priscilla Martinez	Auditor, CTAC
Cindi Castillo	Auditor, CTAC
Lokesh Chaturvedi	Technical Specialist, CTAC
David Ganaway	Technical Specialist, CTAC
Mavis Lin	Technical Specialist, CTAC
Ricardo Maestes	Observer, New Mexico Environment Department (NMED)
Steve Zappe	Observer, NMED
Tom Kesterson	Observer, NMED
Susan McCauslin	Observer, CBFO
Dan Ferguson	Observer, CBFO
Randy Steger	Observer, CTAC
Kenneth Knaff	Observer, CTAC

4.0 AUDIT PARTICIPANTS

Individuals contacted during the audit are identified in Attachment 1. A pre-audit conference was held in the WTS Support Building large conference room on May 10, 2010. The audit was concluded with a post-audit conference in the WTS Support Building large conference room on May 13, 2010.

5.0 AUDIT RESULTS

5.1 Program Adequacy, Implementation, and Effectiveness

The audit team concluded that the WTS Monitoring Programs evaluated were adequate, satisfactorily implemented, and effective for the areas audited.

5.2 QA Program Activities

WTS implementing procedures included in the audit are identified in Attachment 2. Details of the audit are contained in the following sections.

5.2.1 Organization

The audit team interviewed management and QA management personnel and reviewed documentation, including organizational flow charts. The WTS QA Manager reports directly to the General Manager. The audit team concluded that the QA organization has the required authority, independence, access to work areas, and organizational freedom necessary to perform assigned responsibilities. Organizational flow charts illustrating relationships between contracted organizations and WTS management,

indicated adequate structuring for operations to perform assigned responsibilities. The requirements of WP 13-QA.04, *Quality Assurance Department Administrative Program*, were satisfactorily administered. No concerns were identified during this portion of the audit.

Overall, the audit team concluded that Organization continues to be adequate, satisfactorily implemented, and effective.

5.2.2 Quality Assurance Program

The audit team interviewed personnel and reviewed documentation to verify the implementation and effectiveness of the QA Program. QA review of logbooks and data sheets was verified to be in accordance with WP 02-EM3001, *Administrative Processes for Environmental Monitoring and Hydrology Programs*

The WTS training and qualification program was reviewed to ensure personnel are trained and qualified to perform their assigned tasks per 14-TR.04, *WIPP Training Program*. The program was also reviewed to ensure it provides continuing training for personnel to maintain proficiency and to update their skills. The audit team reviewed the methods managers use to determine the training and qualification needs of their personnel. The training department has processes for initial training, qualification, and methods for evaluating organizational changes to tasks and program improvements.

In addition to training and qualification, the CBFO QAPD requires that QA programs address and establish controls for surveillances. These include the monitoring programs and those vendors from the Qualified Suppliers List (QSL) currently involved with the monitoring programs. The audit team interviewed the individual responsible for surveillances and reviewed associated records, and determined that sufficient and timely surveillances are performed, documented, and reported as required.

Based on the interview and reviews of associated documentation and records, the audit team determined that the CBFO QAPD requirement for performing surveillances is adequately addressed and effectively implemented.

Overall, the audit team concluded that the WTS QA Program was adequate, satisfactorily implemented, and effective.

5.2.3 Training

Personnel training records associated with Groundwater Monitoring, Land Management/Biota, Volatile Organic Compound-Hydrogen and Methane Monitoring, and Delaware Basin were examined to verify implementation of associated requirements. These records were examined to verify that personnel (samplers, scientists, field staff, records coordinators, validators, etc.) performing these activities are appropriately qualified. Record reviews included qualification plans, qualification cards, transcripts, exams, and required reading documentation.

The procedure review and objective evidence assembled and evaluated during the audit provided evidence that the applicable requirements for personnel training and qualification for the programs covered are adequately established for compliance with QAPD requirements, satisfactory in implementing these requirements, and effective in achieving the desired results.

Overall, the audit team concluded that the Training Program was adequate, satisfactorily implemented, and effective.

5.2.4 Records

The audit team conducted interviews and reviewed implementing procedures relative to the control and administration of QA records to determine the degree to which the procedures adequately address QAPD requirements. The procedure review included 15-RM, Rev. 1, *WIPP Records Management Program*, and 15-RM 3002, Rev. 1, *Records Filing, Inventory, Scheduling, and Dispositioning*. Control of QA records was verified through review of the following Records Inventory and Disposition Schedule (RIDS):

- Delaware Basin dated 8/10/09
- Environmental Monitoring and Hydrology/Groundwater dated 3/25/2010
- Volatile Organic Compound-Hydrogen and Methane Monitoring dated 5/6/10
- Land Management/Biota dated 6/24/09

Records storage requirements were evaluated by physical walk-downs and observance of QA records stored in fire-proof cabinets in Trailer 918B and the second floor of the Safety Building. The procedures reviewed and objective evidence assembled and evaluated during the audit provided evidence that the applicable requirements for QA records are adequately established for compliance with QAPD requirements, satisfactory in the implementation of these requirements, and effective in achieving the desired results.

5.2.5 Volatile Organic Carbon (VOC)/Hydrogen/Methane Monitoring

The audit team evaluated the adequacy, implementation, and effectiveness of WTS activities associated with VOC/Hydrogen/Methane sampling and reporting at the WIPP. Evaluation of these activities was performed based on review of implementing procedures and objective evidence (i.e., review of operating records, observations, and interviews of VOC/Hydrogen/Methane Monitoring personnel) in accordance with checklists developed from the WTS implementing procedures identified in the Governing Documents section of the CBFO A-10-20 Audit Plan. Specific procedure implementation observations included performance by VOC Monitoring personnel on May 10, 2010, of section 3.5 of WTS implementing Procedure WP 12-VC1684, *VOC Sampling Operations*, Rev. 5, Effective Date 05/07/2010.

The review of implementing procedures and evaluation of the objective evidence provided by VOC/Hydrogen/Methane Monitoring personnel in accordance with the audit checklist provided evidence that WTS activities associated with VOC/Hydrogen/Methane sampling and reporting at the WIPP adequately address upper-tier program document requirements, are fully implemented, and are technically effective for a quality performance monitoring program.

The audit team concluded that the WTS VOC/Hydrogen/Methane Monitoring activities are adequate, satisfactorily implemented, and effective.

5.2.6 Groundwater Monitoring and Delaware Basin

The audit team evaluated the adequacy, implementation, and effectiveness of the Groundwater Monitoring and Delaware Basin activities at the WIPP. Evaluation of these activities included observation of groundwater monitoring sampling activities (serial and final samples) at Groundwater Monitoring Well WQSP-1 on May 12, 2010. In addition, the evaluation included a review of associated records, data sheets, logbook entries, and interviews with WTS personnel. Audit checklists based on the most current versions of implementing procedures were provided to WTS personnel and used as guides during the audit.

The Delaware Basin compliance with Procedures WP 02-PC.02 Rev.2, *Delaware Basin Drilling Surveillance Plan*, and WP 02-EC 3002, *Delaware Basin Drilling Database Upgrade Process*, was determined through interviews with responsible WTS personnel, viewing the databases on WTS computers, and examination of records and reports generated to comply with these procedures.

The audit team examined the use of the following databases to collect the data for the database Delaware Basin Well Tracking Application (DBWTA), which is used to prepare the Delaware Basin Monitoring quarterly and annual reports.

- DRILLINGINFO.COM
- NMOCD Weekly ID Reports
- IHS ENERDEQ

The audit team observed demonstrations of use of the DBWTA database to obtain several examples of data used to report to Sandia National Laboratories (SNL) for use in updating performance assessment (PA) for WIPP.

The databases listed in section 5 of the Surveillance Plan (WP02.PC02) were observed on the project computer. The well history file contains copies of these databases.

Copies of quarterly and annual reports were examined, including the following:

- Delaware Basin Quarterly Report, March 2010
- Delaware Basin Monitoring Annual Report, DOE/WIPP-09-2308, September 2009.

The audit team determined that the Delaware Basin Monitoring Program was adequate, satisfactorily implemented, and effective.

Specific records reviewed included sampling records for Round 30 sampling at Groundwater Monitoring Well WQSP-1, and the Groundwater Monitoring Program semi-annual report for Round 29 sampling.

One deficiency was identified applicable to the groundwater monitoring program and is summarized in section 6.

Overall, the audit team determined that the Groundwater Monitoring and Delaware Basin activities at the WIPP are adequate, satisfactorily implemented, and effective.

5.2.7 Biotic/Surface Water/Sediment/Soil Sampling/Water Quality Monitoring and EM&H Field Work

The audit team reviewed data sheets for soil sampling, biotic sampling, surface water and sediment sampling, vegetation sampling, EM&H field work (oil and gas surveillance), and data package validation documentation. Chain of custody (COC) and analytical laboratory request for analysis (RFA) documents were reviewed and found to be compliant. Material and testing equipment (M&TE) certifications were audited and found to be acceptable. Surface water and sediment sampling were observed on the Tub Tank site and found to be satisfactory.

During the audit, two concerns were identified. The first concern was that the environmental sampling and data validation procedures have not been maintained with current practices. The second concern was that a part of the WP 02-EM1024 R3 was not followed, and fully implemented. The quarterly report had not been transmitted to SNL as required since January 2009.

The audit team recommended that WTS update the procedures to reflect current practices. Overall, procedures were found to be marginally adequate and WTS operations were satisfactorily implemented and effective.

Overall, the audit team concluded that Biotic/Surface Water/Sediment/Soil Sampling/Water Quality Monitoring Processes were adequate, satisfactorily implemented, and effective.

6.0 CARs, CDAs, Observations, and Recommendations

6.1 CARs

During the audit, the audit team may identify CAQs and document such conditions on 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, transuranic (TRU) waste site certification, compliance demonstration, or the effective implementation of the QA program.

One CAQ requiring the generation of a CAR was identified during the course of the audit, as described below.

CAR 10-035

Per the Reporting Requirements of *Data Validation and Verification of RCRA Constituents*, Section 7.2.2, WIPP Groundwater Detection Monitoring Semiannual Report did not include the EM&H Manager or designee review and approval signature and date on the report. Also, the distribution of the semi-annual report to the QA Manager and Field Team Leader was not performed as required in the procedure.

Also, while reviewing the data packages from the WIPP Groundwater Detection Monitoring Semiannual Report, in Attachments 3-12, the appropriate columns required to be marked Y/N or NA for any section that is not applicable and provide justification are not being marked appropriately. Some sections are left blank and sections filled with NA are not justified and performed as required in the procedure.

6.2 Deficiencies Corrected During the Audit (CDAs)

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 members, in conjunction with the ATL, determine if the CAQ is an isolated case requiring only remedial action and therefore can be a CDA. Upon determination that the CAQ is isolated, the audit team members, in conjunction with the ATL, evaluate/verify any objective evidence/actions submitted or taken by the audited organization and determine 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 following definition.

Corrected During the Audit (CDA) – Isolated deficiencies that do not require a root cause determination or actions to preclude recurrence, and where 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 dated (isolated), and one or two individuals who have not completed a reading assignment.

CDA-1

During the sample collection process, the sample collection staff completed the chain-of-custody record as the last step in the sampling process. The generation of the chain-of-custody should be initiated at the start of the sampling event. The responsible section manager instructed the sampling staff to the chain-of-custody initiation and completion process. The audit team verified sample collection staff instruction was completed prior to the end of the audit.

6.3 OBSERVATIONS

During the audit, the audit team may identify conditions that warrant input by the audit team to the audited organization regarding potential problems or suggestions for program improvement. The audit team members, in conjunction with the ATL, evaluate these conditions and classify them as observations or recommendations (using the following definitions). Once a determination is made, the audit team members, in conjunction with the ATL, categorize the conditions appropriately.

Observation – A condition that is determined not to be a violation of procedure or requirement at the time but, if not controlled or addressed, may result in a CAQ during future activities.

Recommendation – Suggestion that is directed toward identifying opportunities for improvement and enhancing methods of implementing requirements.

Three Observations were noted during the course of this audit, as described below.

Observation 1

VOC documentation: Per WP 12-VC1684, *VOC Sampling Operations*, Attachment 2, the Sample Data Sheet completed for sampling locations VOC-A and VOC-B on 5/10/2010 during observation of procedure performance shows the RCT section lined out. The current revision 5, effective date 05/07/10, of this procedure indicates the RCT has to scan the filters. This process is only done for the filters in the disposal room area.

Observation 2

Field Work: WP 02-EM1024, Revision 3, section 1.2.6, EM&H Field Work, states that the Land Use Coordinator sends the Oil and Gas Surveillances Quarterly Report to CBFO and SNL. This was not completed for SNL.

Observation 3

Procedure updates: Environmental sampling and data validation procedures have not been maintained to reflect current practice. Procedures needing update included Soil Sampling, Biotic Sampling, Vegetation Sampling, Surface Water and Sediment Sampling, and Radiological Sampling Verification and Validation.

6.4 Recommendations

The following Recommendations were offered during the course of this audit.

Recommendation 1

Attachments 6 and 7 of Procedure WP 12-VC3209, *VOC Monitoring and Hydrogen/Methane Process Evaluation, Validation, and Notification*, do not contain information traceable to the procedure and revision of the procedure used for recording the Data Summary Spreadsheet and Air Conversion Spreadsheet (Attachments 6 and 7, respectively).

Recommendation 2

WP 12-VC.01, *Confirmatory Volatile Organic Compound Monitoring Plan*, for VOC collection is subject to SUMMA[®] canisters and SUMMA[®] passivated sampling lines instead of passivated canisters as stated in EPA Compendium Method TO-15 and passivated sampling lines. WP 12-VC.01 should be revised to remove the word SUMMA[®] and replace it with passivated canisters and passivated sampling lines.

7.0 ATTACHMENTS

- Attachment 1: Personnel Contacted During the Audit
- Attachment 2: WTS Documents Evaluated
- Attachment 3: Summary Table of Audit Results

PERSONNEL CONTACTED DURING THE AUDIT				
NAME	ORGANIZATION / DEPARTMENT	PREAUDIT MEETING	CONTACTED DURING AUDIT	POSTAUDIT MEETING
Allen, Bill	WTS/Quality Assurance	X		X
Balderrama, M.	WRES/EM&H Land Mgt			X
Bellows, H. W.	WTS/ Ops. Prog. Mgr.	X		X
Boatwright, Wes	WRES/VOC Scientist	X	X	X
Britain, Randy	WTS/Integrated Ops Mgr	X	X	X
Bryan, Wes	WTS/Site Ops&Disp.Mgr	X	X	
Callicoa, John	WRES Scientist	X	X	X
Carrasco, Rey	WTS/RPD & Geo. Mgr.	X		X
Chavarria, A.	WTS/QA Analyst	X	X	X
Chavez, Art	WRES			X
Chavez, Rick	WRES RC Dept.	X	X	X
Di'Amico, Eric	WRES			X
Eggleston, Rick	WTS/VOC	X	X	
Fabian, Tom	WTS/Tech. Training		X	
Frank-Supka, Linda	WRES/Engineer		X	
Garcia, Oscar	WTS/EM&H/VOC		X	
Hendrickson, J.	WTS/Mgr. EN/Tech. Ser.	X	X	
Hendrickson, M	WTS/GMO	X		X
Hernandez, J.	WTS/Env. Monitoring		X	X
Hoff, J. E.	WTS/Quality Assurance	X	X	X
Jimenez, Richard	WRES/Scientist		X	
Johnson, RaeLynn	WRES/Lead Tech.		X	
Jones, S. B.	WRES/ Section Manager	X	X	X
Jungclaus, Greg	WRES/EM&H En. Chem.	X	X	X
Kirby, Bob	WTS/UG Ops Manager	X	X	X
Keathley, Martin	WTS/Qual. Progs. Mgr.	X		X
Klein, Kit	WTS/QA Analyst	X		X
Kouba, Steve	WRES/Mgr. EPA Compl.	X	X	X
Lichty, Tom	WTS/Technical Training		X	
Moore, Helen	WRES/SEC			X
Mullins, Mary Ann	WTS/Quality Assurance	X	X	X
Neatherlin, Jeff	WTS/UG Ops	X	X	
Neatherlin, Jimmy	WTS/ EM&H		X	X

PERSONNEL CONTACTED DURING THE AUDIT				
NAME	ORGANIZATION / DEPARTMENT	PREAUDIT MEETING	CONTACTED DURING AUDIT	POSTAUDIT MEETING
Paslay, Robert	WTS	X		
Picazo, Esther	WRES/Env. Scientist	X	X	
Rivas, Arulio	WTS/WTS EM&H		X	X
Rouch, B. P.	WTS/WRES Engineer		X	X
Salness, Rick	WTS/Quality Assurance	X	X	X
Spoon, Robbin	WRES/EM&H		X	
VandeKraats, John	WRES			X
Watterson, Dan	WRES/EM&H Envir. Spe.		X	X
Yocam, Pat	WTS/Gen. Mgr. Office			X
Zimmerly, Ty	WRES			X

WTS Documents Evaluated		
Number	Doc Number	Applicable WTS Document
1	DOE/CBFO 94-1012	<i>US Department of Energy Carlsbad Field Office Quality Assurance Program Document</i>
2	WP 02-1	<i>WIPP Groundwater Monitoring Program Plan</i>
3	WP 13-1	<i>Washington TRU Solutions LLC Quality Assurance Program Description</i>
4	WP 13-QA.03	<i>Quality Assurance Independent Assessment Program</i>
5	WP 13-QA.04	<i>Quality Assurance Department Administrative Program</i>
6	WP 02-EM.02	<i>Integrated Sample Control Plan</i>
7	WP 02-EM1009	<i>Soil Sampling</i>
8	WP 02-EM1011	<i>Biotic Sampling</i>
9	WP 02-EM1015	<i>Water Quality Monitoring</i>
10	WP 02-EM1017	<i>Surface Water and Sediment Sampling</i>
11	WP 02-EM1019	<i>Vegetation Sampling</i>
12	WP 02-EM1024	<i>EM&H Field Work</i>
13	WP 12-VC.01	<i>Confirmatory Volatile Organic Compound Monitoring Plan</i>
14	WP 12-VC.02	<i>Quality Assurance Project Plan for VOC Monitoring</i>
15	WP 12-VC1620	<i>VOC Sample Canister Handling and Sampling</i>
16	WP 12-VC1683	<i>VOC Sampler Handling and Use</i>
17	WP 12-VC3208	<i>VOC Data Handling</i>
18	WP 12-VC3209	<i>VOC Monitoring Laboratory Data Review and Validation</i>
19	WP 12-VC3210	<i>VOC Data Reporting</i>
20	WP 02-1002	<i>Electric Submersible Pump Monitoring System Installation and Operation</i>
21	WP 02-EM1005	<i>Groundwater Serial Sample Analysis</i>
22	WP 02-EM1006	<i>Final Sample and Serial Sample Collection</i>
23	WP 02-EM1007	<i>Cation and Anion Analysis</i>

WTS Documents Evaluated		
Number	Doc Number	Applicable WTS Document
24	WP 02-EM1014	<i>Groundwater Level Measurement</i>
25	WP 02-EM1018	<i>Onan 25DKAF Generator Set Operation</i>
26	WP 02-EM1021	<i>Pressure Density Survey</i>
27	WP 02-EM1025	<i>Construction of the Potentiometric Surface Map for the Annual Site Environmental Report and Shallow Subsurface Water</i>
28	WP 02-EM1026	<i>Water Level Data Handling and Reporting</i>
29	WP 02-EM3001	<i>Administrative Processes for EM and Hydrology Programs</i>
30	WP 02-EM3003	<i>Data Validation and Verification of RCRA Constituents</i>
31	WP 02-EM3004	<i>Radiological Data Verification and Validation</i>
32	WP 02-PC.02	<i>Delaware Basin Drilling Surveillance Plan</i>
33	WP 02-EC3002	<i>Delaware Basin Drilling Database Upgrade Process</i>
34	WP EU-1305	<i>Installing Multiposition Borehole Rod Extensometers</i>
35	WP 14-TR.01	<i>WIPP Training Program</i>
36	WP 15-GM1000	<i>Management Assessments</i>
37	WP 15-MD3100	<i>Operating Experience Program</i>
38	WP 15-PC3041	<i>Approval/Variation Request Processing</i>

Summary Table of Audit Results

Audit Elements	Concern Classification				QA Evaluation		
	CARs	CDAs	Obs	Rec	Adequacy	Implementation	Effectiveness
Organization Program					A	S	E
Quality Assurance Program					A	S	E
Training					A	S	E
Records					A	S	E
VOC/Hydrogen/Methane Monitoring			1	1	A	S	E
Groundwater Monitoring	10-035				A	S	E
Delaware Basin					A	S	E
Biotic-Vegetation Sampling/EM&H Field Work			2		A	S	E
Surface Water/Sediment/Soil Sampling/Water Quality Monitoring		1			M	S	E
TOTALS	1	1	3	1	A	S	E

Definitions

E = Effective

CDA = Corrected During Audit

CAR = Corrective Action Report

A = Adequate

Rec = Recommendation

S = Satisfactory

Obs = Observation

M = Marginal