



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

AUG 17 2010



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

Subject: Surveillance Report for Surveillance S-10-29, WTS Industrial Safety and Health Program

Dear Mr. Hoff:

The Carlsbad Field Office (CBFO) conducted a surveillance of the Washington TRU Solutions (WTS) Industrial Safety and Health Program on July 27-29, 2010. The CBFO surveillance report is enclosed.

The surveillance team concluded that the activities evaluated are adequate in addressing upper-tier applicable requirements; however, due to the number of deficiencies identified, the associated requirements were determined to be marginally implemented and effective.

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

Sincerely,

M. Lea Chism
 Quality Assurance Specialist

Enclosure

cc: w/enclosure
 A. Holland, CBFO
 H. Budweg, CBFO
 D. Gadbury, CBFO
 D. Miehl, CBFO
 M. Navarrete, CBFO
 F. Sharif, WTS
 M. A. Mullins, WTS
 M. Eagle, EPA
 E. Feltcorn, EPA
 R. Joglekar, EPA
 S. Ghose, EPA

*ED
 ED
 ED

R. Lee, EPA
 S. Zappe, NMED
 S. Holmes, NMED
 T. Kesterson, DOE OB WIPP NMED
 D. Winters, DNFSB
 B. Pace, CTAC
 K. Martin, CTAC
 P. Hinojos, CTAC
 WIPP Operating Record
 CBFO QA File
 CBFO M&RC

ED
 ED

*ED denotes electronic distribution



CBFO SURVEILLANCE REPORT

Surveillance Number: S-10-29 Date of Surveillance: July 27-29, 2010
Surveillance Title: WTS Industrial Safety & Health Program

Organization: Washington TRU Solutions (WTS)

Surveillance Team:

M. Lea Chism	CBFO Management Representative
Norman C. Frank	Team Leader, Carlsbad Field Office Technical Assistance Contractor (CTAC)
Priscilla Martinez	Team Member, CTAC
Joe Field	Team Member, CTAC
Jack Walsh	Team Member, CTAC

Surveillance Scope:

The surveillance evaluated the adequacy and implementation of selected portions of the WTS IS&H Program. The surveillance also included an evaluation of the applicable WTS implementing procedures.

Surveillance Results:

The evaluation of WTS IS&H activities and documents were based on the current revision of the following IS&H documents:

- WP 12-IS3002
- WP 12-IS1001
- WP 12-IS1002
- WP 12-IS1005
- WP 12-IS1810
- WP 12-IS1818
- WP 12-IS1819
- WP 12-IS1832
- WP 12-IH1004
- WP 12-IH1006
- WP 12-IH1007
- WP 12-IH1815

Other documents that were used or referenced during the surveillance included:

- WP 13-1, *WTS Quality Assurance Program Description*
- WP 14-TR.01, *WIPP Training Program*
- WP 15-RM, *WIPP Records Management Program*
- WP 16-2, *Software Screening and Control*

Activities Evaluated:

The following IS&H Program activities were evaluated:

Performance of job hazards analysis	Sampling from the high pressure oxygen booster
Chlorine sampling of WIPP drinking water	Emergency eyewash and shower equipment
Coliform sampling of WIPP drinking water	Noise Surveys
Self-contained breathing apparatus and respirator face piece inspections	Local exhaust annual face velocity testing
Quantitative fit testing	Airborne contaminant sampling
Sampling air from the Mako compressor	Personal sampling pump calibration

Results:

This surveillance included 12 implementing procedures associated with the WTS IS&H program governing the activities evaluated as described above. The surveillance team identified thirteen concerns during the surveillance. These concerns were consolidated into eight CARs, two Observations and one Recommendation. The CARs were submitted under a separate cover.

Overall, the program elements evaluated were adequate in addressing applicable upper-tier requirements; however, due to the number of concerns identified, the associated requirements were determined to be marginally implemented and effective.

Corrective Action Reports:

CAR 10-040: Personnel performing WP 12-IH1815, R0, are not completing the required on-the-job training.

CAR 10-041: Notification to employees and their supervisors of air contaminant sampling results is not being provided within 14 days per procedure WP 12-IH1006, R1, requirements.

CAR 10-042: WP 12-IH1815, R0, Section 2.20 requires that a copy of Attachment 2 be posted on the Welding Fume Hood. Contrary to the requirement, a label with Pass, Date of Survey, and Initials is used. There were two fume hoods in the mechanics shop, and neither fume hood was posted appropriately as required.

CAR 10-043: Records are not being managed as required by the Records Inventory and Disposition Schedule (RIDS):

- WP 12-IH1815, R0, Attachments 1 and 2 are maintained as records but are not identified on a RIDS.
- WP 12-IH1007, R2, Records are being maintained in Schwab 5000 1-hour fire resistant cabinets, but are not being transmitted to the WIPP Records Archive (WRA), per the RIDS.

CAR 10-044: Records for noise surveys have not being managed as records:

- The Safety Database contains electronic records dating back to 2001. The Safety Database is not identified on the RIDS and has not been submitted to records.
- The paper records have not been submitted to records.
- The database does not include the signature of the worker on the report.
- Both the paper and the safety database information are required to have a complete record.

CAR 10-045: Records are incomplete:

- Noise procedure requires recording the results of calibration. On the form, only the information for the calibration device and for the dosimeter is documented. Internal recording does not include the results, but only includes information that a calibration was performed and only the last calibration is available for download.
- Incomplete noise dosimetry records. Paper copies of the results from the noise dosimeter include two pages, with the second page containing the values recorded and the graph for the time period. When the paper copy is filed, the second page is not. The second page is available electronically.
- 15-RM requires blank spaces to be marked with N/A. This is not being accomplished for noise survey records.

CAR 10-046: WP 12-IS1819, R1 and WP 12-IS1818, R1, requires air sampling to be conducted quarterly in accordance with National Fire Protection Association (NFPA) Standard #1404, Chapter 7, §7-1. No evidence could be provided that the sampling was conducted in the third and fourth quarter of 2009 and in the second quarter of 2010.

CAR 10-047: When notes taken in the field are transcribed into the Safety Database, there is no second person performing a check/validation that the entry is correctly transcribed. This check/validation is required by WP 13-1.

Observations:

Two Observations are provided to management for consideration.

Observation #1: WP 12-IH1007, R2, Sections "References" and 4.1 both reference an obsolete procedure (WP 15-PR3002; Records Filing, Inventorying, Scheduling, and Dispositioning). Even though the required periodic reviews have been performed as required, procedure WP 12-IH1007 still references an obsolete procedure. WP 12-IH1007 was last reviewed on 5/13/2010. WP 15-PR3002 became obsolete on 7/21/09.

Observation #2: WP 10-IH1004, R2, Section 1.4.5 states "Send a copy of the summary report and any graphs to Health Services." The individual noise dosimetry records are not being provided to Health Services in a timely manner. This could lead to a problem in a medical emergency.

Recommendation:

One Recommendation is provided to management for consideration.

Noise survey personnel have the option of using a paper system or the database. This could lead to confusion as to which is the record copy. The audit team recommends that one method be used for the record copy.

Surveillance Team Leader Signature: Norman Frank

Date: 8/17/10

Assistant Manager/Office Director: N/A

Date: _____

CBFO QA Director Approval Signature: D. J. Mully

Date: 8-17-10