

United States Government

Department of Energy

memorandum

Carlsbad Field Office
Carlsbad, New Mexico 88221

DATE: OCT 7 2010

REPLY TO
ATTN OF: CBFO:QA:DSM:MAG:10-1831:UFC 2300.00

SUBJECT: Surveillance Report S-10-37 of the BAPL/CCP Remote-Handled Waste Sampling and Visual Examination Processes

TO: Christopher Labee, DOE-NRLFO



The Carlsbad Field Office (CBFO) conducted Surveillance S-10-37 of the Bettis Atomic Power Laboratory Central Characterization Project (BAPL/CCP) Remote-Handled Waste Sampling and Visual Examination characterization processes on September 21-22, 2010. The surveillance report is attached.

One Corrective Action Report (CAR) was issued under separate cover as a result of the surveillance. The surveillance team concluded that, with the exception noted, the BAPL/CCP technical and quality assurance programs for the processes evaluated were adequate, satisfactorily implemented, and effective.

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

Dennis S. Miehls
Senior Quality Assurance Specialist

Attachment

cc: w/attachment

- | | | | |
|-----------------------|------|-------------------------------------|----|
| A. Holland, CBFO | * ED | E. Feltcorn, EPA | ED |
| M. Navarrete, CBFO | ED | S. Ghose, EPA | ED |
| W. Mackie, CBFO | ED | R. Lee, EPA | ED |
| J. R. Stroble, CBFO | ED | S. Zappe, NMED | ED |
| T. Morgan, CBFO | ED | S. Holmes, NMED | ED |
| D. Haar, WTS/CCP | ED | T. Kesterson, DOE OB WIPP NMED | ED |
| D. Ploetz, WTS/CCP | ED | D. Winters, DNFSB | ED |
| V. Cannon, WTS/CCP | ED | G. Lyshik, LANL-CO | ED |
| I. Quintana, WTS/CCP | ED | P. Gilbert, LANL-CO | ED |
| A. J. Fisher, WTS/CCP | ED | P. Gomez, CTAC | ED |
| M. Walker, WTS/CCP | ED | K. Martin, CTAC | ED |
| Y. Salmon, WTS/CCP | ED | P. Martinez, CTAC | ED |
| J. Hoff, WTS | ED | WWIS Database Administrators | ED |
| M. A. Mullins, WTS | ED | WIPP Operating Record | ED |
| T. Peake, EPA | ED | CBFO QA File | |
| M. Eagle, EPA | ED | CBFO M&RC | |
| R. Joglekar, EPA | ED | *ED denotes electronic distribution | |



CBFO SURVEILLANCE REPORT

Surveillance Number: S-10-37 **Date of Surveillance:** September 21 – 22, 2010

Surveillance Title: Bettis Atomic Power Laboratory Central Characterization Project (BAPL/CCP) Visual Examination and Remote-Handled Waste Sampling Processes

Organization Surveilled: BAPL/CCP

Surveillance Team:

Paul C. Gomez	Surveillance Team Leader, CBFO Technical Assistance Contractor (CTAC)
Jim Oliver	Technical Specialist, CTAC
Rhett Bradford	Auditor, CTAC
Earl Bradford	Auditor, CTAC

Surveillance Scope:

The scope of the surveillance was to observe and evaluate the visual examination (VE) and radiological sampling processes being used at the BAPL/CCP in support of characterization of waste containers to be shipped to the Waste Isolation Pilot Plant (WIPP).

Surveillance Purpose:

This surveillance was intended to provide assurance that BAPL/CCP VE and radiological sampling operations were adequate, satisfactorily implemented, and effective. The surveillance team focused on evaluation of VE processes, sample collection, sample custody, sample preparation, and sampling procedures.

Activities Evaluated:

Visual Examination – The surveillance team observed VE of high-pressure inner container (HIP) 41-20 in the BAPL Materials Evaluation Laboratory (MEL). The contents were removed from the HIP in MEL Hot Cell #13. The contents were examined for prohibited items. None were found. The contents were rotated, stirred, and re-examined and again, no prohibited items were found.

The surveillance team evaluated training records for two VE operators and the Visual Examination Appointment documents for the operators performing VE activities at BAPL. The training records reflected the current operating procedures and acceptable knowledge documentation for this site.

The team determined that the VE operations were satisfactory and procedures were effectively implemented.

Waste Sampling – Staff interviews were conducted and sampling activities within the MEL Hot Cell #13 were observed to verify proper sample collection from HIP 41-20. Chain-of-custody records were reviewed as part of the evaluation of adherence to sampling procedures. Sampling activities were found to be performed in accordance with requirements. Written records were found to be satisfactory. Evidence of activities such as final batch data report (BDR) preparation with completed independent technical review (ITR) was not evaluated because the sampling process was still underway and these steps will not be done until after the current sampling campaign is completed. No concerns were found associated with this sampling activity.

Overall, the surveillance team determined Waste Sampling activities were adequate, satisfactory, and effective.

Quality Assurance – Various elements of the CCP Quality Assurance (QA) program were reviewed to ensure compliance with the Carlsbad Field Office (CBFO) *Quality Assurance Program Document (QAPD)*. A short checklist was prepared for review of CCP QA program implementation, including the verification of QA requirements for personnel training, identification and reporting of nonconforming conditions, document and procedure control, records management, control of materials and test equipment (M&TE) for data collection, and data management (the use of laboratory notebooks).

No issues were identified with training, reporting of nonconforming items, records management, or the control of M&TE. One concern was identified in the area of control of procedures, and another concern was identified concerning the administrative control of laboratory notebooks and CCP had not assigned a Vendor Project Manager (VPM) for BAPL. These concerns are explained below.

Procedure Controls and Use – The CCP VE inspectors do not have access to any electronic equipment while performing their respective duties on the BAPL site. Therefore, they do not have access to the CCP Facility Technical Procedures (FTP) site for verification that the most current procedures are available at their work location. The upper-level program documents and procedures reference the CCP procedures that contain instructions for accomplishing various activities in compliance with the QA program. Inspectors are allowed to have printed copies of procedures, but do not have a complete set of the procedures that impact their daily activities. Examples of these procedures include CCP-QP-002, *CCP Training and Qualification Plan*; CCP-QP-005, *CCP TRU Nonconforming Item Reporting and Control*; CCP-QP-008, *CCP Records Management*; CCP-QP-011, *CCP Laboratory Logbooks*; and CCP-QP-016, *Control of M&TE*.

Control of Logbooks (Laboratory Logbooks) – The BAPL remote-handled (RH) waste program requires the use of logbooks to record daily activities and other pertinent activities that control the VE and sampling processes. The upper-level CCP procedures reference the use of CCP-QP-011, which is the guide for initiation and control of logbooks and identifies the logbooks as QA records. The BAPL/CCP RH program specifies CCP-PO-005 for control of Conduct of Operations at the site. This procedure identifies the responsibilities of the VPM and the responsibility for the VPM related to review of CCP logbooks (i.e., a weekly review of logbooks to ensure correct recording of

project data). To date, the BAPL/CCP does not have an assigned VPM per CCP-PO-511, *CCP/BAPL RH TRU Waste Interface Document*; therefore, compliance with Conduct of Operations process requirements cannot be demonstrated. Corrective Action Report 11-001 was issued by CBFO to BAPL/CCP to resolve this concern.

Governing Documents/Requirements:

Evaluation of the overall program adequacy and effectiveness of BAPL/CCP documents was based on the current revisions of the following documents:

- DOE/CBFO-94-1012, *CBFO Quality Assurance Program Document (QAPD)*
- NM4890139088-TSDF, Waste Isolation Pilot Plant Hazardous Waste Facility Permit, the New Mexico Environment Department
- DOE/WIPP-02-3122, *Transuranic Waste Acceptance Criteria for the Waste Isolation Pilot Plant (WAC)*
- DOE/WIPP-02-3214, *Remote-Handled TRU Waste Characterization Program Implementation Plan (WCPIP)*
- CCP-TP-500, *CCP Remote-Handled Waste Visual Examination*
- CCP-TP-512, *CCP Remote-Handled Waste Sampling*
- CCP-QP-002, *CCP Training and Qualification Plan*
- CCP-QP-005, *CCP TRU Nonconforming Item Reporting and Control*
- CCP-QP-008, *CCP Records Management*
- CCP-QP-011, *CCP Laboratory Logbooks*
- CCP-QP-016, *CCP Control of Measuring and Testing Equipment*

Surveillance Results:

The results of the surveillance indicate that the BAPL/CCP activities related to VE and radiological sampling operations are adequate, satisfactorily implemented, and effective, with the following exceptions.

Corrective Actions:

CAR 11-001

Requirement:

CCP-PO-511, Revision 0, *CCP/BAPL RH TRU Waste Interface Document*, section 3.6.7, "CCP Vendor Project Manager (VPM)...Supervises day-to-day TRU waste characterization activities."

CCP-PO-005, Revision 21, *CCP Conduct of Operations*, section 12.5, "Log Keeping – Logbook Reviews...The VPM will review, sign, and date the logbook each operational week at a minimum. The reviews validate the entries are accurate and adequate."

Condition adverse to quality:


A Vendor Project Manager was not assigned to BAPL/CCP at the time of the surveillance; thus, the VPM was not able to carry out the functions required in the Interface Document, CCP-PO-511.

The CCP Conduct of Operations procedure cannot be performed without a VPM designated for BAPL/CCP logbook reviews (section 12.5) for weekly entry reviews.

Recommendation:

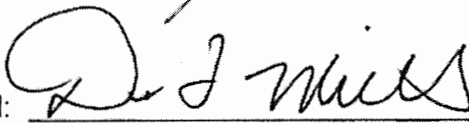
The VE and sampling inspectors are allowed to have printed copies of procedures, but do not have a complete set of procedures that impact their daily activities. The surveillance team recommends that controlled copies of all relevant procedures be available to the CCP personnel at the work location.

Surveillance Team Leader:


Paul C. Gomez, CTAC

Date: 10-7-10

CBFO QA Director Approval:


Ava L. Holland, CBFO
Director, Quality Assurance

Date: 10-7-10