

United States Government

Department of Energy

memorandum

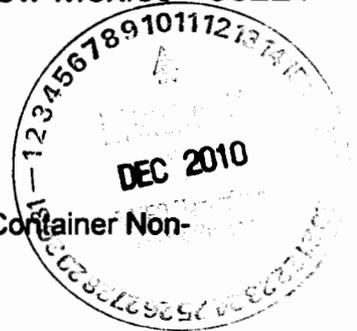
 Carlsbad Field Office
 Carlsbad, New Mexico 88221

DATE: DEC 10 2010

REPLY TO
ATTN OF: CBFO:QA:DSM:MAG:10-2401:UFC 2300.00

SUBJECT: Surveillance Report for CBFO Surveillance S-11-10 of SRS/CCP Large Container Non-Destructive Examination System Follow-Up Activities

TO: Herbert Crapse, DOE-SR



Attached is the Surveillance Report for Carlsbad Field Office (CBFO) Surveillance S-11-10, Savannah River Site Central Characterization Project (SRS/CCP) Large Container Non-Destructive Examination System follow-up activities. The surveillance was conducted November 30 – December 1, 2010 in Carlsbad, New Mexico.

The surveillance team concluded that the technical and quality assurance programs for the processes evaluated were adequate, satisfactorily implemented, and effective. The details of the surveillance are provided in the enclosed surveillance report.

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

Dennis S. Miehl
Acting Director of Quality Assurance

Attachment

cc: w/attachment

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CBFO SURVEILLANCE REPORT

Surveillance Number: S-11-10 **Date of Surveillance:** November 30 and
December 1, 2010

Surveillance Title: Savannah River Site Central Characterization Project (SRS-CCP)
Large Container Non-Destructive Examination (LCNDE) System

Organization: SRS-CCP

Surveillance Team:

Priscilla Y. Martinez	Team Leader, CBFO Technical Assistance Contractor (CTAC)
Porf Martinez	Auditor/Technical Specialist, CTAC
Rhett Bradford	Technical Specialist, CTAC

Surveillance Scope:

Surveillance S-11-10 was conducted to verify the adequacy, implementation, and effectiveness of the SRS-CCP LCNDE system used for characterizing contact-handled and remote-handled waste in standard waste boxes (SWBs) and standard large box 2s (SLB2s). The surveillance team reviewed batch data reports (BDRs) and observed associated video/audio media.

NOTE: During the annual SRS-CCP Recertification Audit A-11-01, performed in October 2010, the real-time radiograph (RTR) activities for the LCNDE were limited to the audit team's observation of the operation of the system using a SWB, procedural reviews, and review of training documentation.

Surveillance Results:

The surveillance team determined that the SRS-CCP LCNDE activities evaluated were adequate, satisfactorily implemented, and effective. The evaluation was based on the following documents:

- *CBFO Quality Assurance Program Document (QAPD), DOE/CBFO-94-1012*
- *Hazardous Waste Facility Permit, Waste Isolation Pilot Plant, EPA No. NM4890139088-TSDF, New Mexico Environment Department*
- *CCP Standard Real-Time Radiography (RTR) Inspection Procedure, CCP-TP-053*
- *CCP Large Container Non-Destructive Examination (LCNDE) Operating Procedure, CCP-TP-074*
- *CCP Project Level Data Validation and Verification, CCP-TP-001*
- *CCP Training and Qualification Plan, CCP-QP-002*

Activities Evaluated:

The audit team evaluated documentation from RTR activities performed at SRS-CCP using the LCNDE system for characterizing Summary Category Group S5000 contact-handled debris waste.

The surveillance team evaluated the following RTR-related CCP procedures: CCP-QP-002, *CCP Training and Qualification Plan*; CCP-TP-053, *CCP Standard Real-Time Radiography (RTR) Inspection Procedure*; and CCP-TP-074, *CCP Large Container Non-Destructive Examination (LCNDE) Operating Procedure*. The review determined that the procedures adequately address upper-tier requirements.

RTR operator training and qualification records were reviewed during the SRS-CCP recertification Audit A-11-01, conducted in October 2010.

The surveillance team interviewed personnel and examined RTR BDRs SRLBR0001 and SRLBR0002, and reviewed the associated video/audio media. As a result of the review, the audit team identified three concerns. In the first concern, no objective evidence was provided to verify the RTR operators were trained to CCP-AK-SRS-012, *CCP/SRS AK Summary*, Revision 3. Revisions included changes to typical packaging configurations. In the second concern, the audit team recommended CCP revise procedure CCP-TP-053 to include provisions for performing RTR on SWBs and SLB2s. The recommendation included examples of changes to the procedure. In the third concern, the audit team examined BDR SRLBR0002, and containers SR57053103 and SR57171701. Both contained dense waste material and sharp/heavy objects. The locations of these items were not identified or recorded on Section 3 of Attachment 2 – CCP Radiography Data Sheet, as required.

The surveillance team was able to review BDRs and their associated audio/video media to determine implementation and effectiveness of the LCNDE system.

Overall, RTR activities were determined to be adequate in addressing upper-tier requirements, satisfactorily implemented, and effective.

Corrective Actions:

Two conditions adverse to quality necessitating the generation of two CBFO corrective action reports (CARs) were noted during this surveillance. The CARs, 11-014 and 11-015, have been transmitted to SRS-CCP under separate cover.

CAR 11-014

No objective evidence was provided to verify RTR operators were trained to CCP-AK-SRS-012, Rev. 3, *CCP/SRS AK Summary*. Revisions included changes to typical packaging configurations.

CAR 11-015

In BDR SRLBR0002, containers SR57053103 and SR57171701 were both reported as containing dense waste material and sharp/heavy objects. The locations of these items were not identified or recorded on Section 3 of Attachment 2 – CCP Radiography Data Sheet, as required.

Recommendation:

The audit team recommended CCP revise procedure CCP-TP-053 to include provisions for performing RTR on SWBs and SLB2s. Examples include, but are not limited to:

- Include allowance of image quality to 3 Mev for the SLB2s
- Include limitations for liquid in SLB2s
- Include weights for items found in SWBs and SLB2s (i.e., 85 gal. drums, wooden boxes)
- RTR operators be more descriptive when identifying waste both on record and video
- Measurement device be used on all SLB2s
- RTR operators use the LCNDE System's 3 Mev capability to its fullest potential when scanning dense objects

Surveillance Team Leader Signature: Priscilla Y. Martinez Date: 12-9-10
Priscilla Y. Martinez

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

CBFO QA Director Approval Signature: Dennis S. Miehl Date: 12-9-10
Dennis S. Miehl