



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

DEC 22 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-11-02, WTS Job Hazard Analysis Program

Dear Mr. Hoff:

The Carlsbad Field Office (CBFO) conducted Surveillance S-11-02 of the Washington TRU Solutions (WTS) Job Hazard Analysis Program on December 14-16, 2010. The surveillance report is enclosed.

No CBFO Corrective Action Reports (CARs) were issued as a result of this surveillance. The surveillance team made one Observation, which is described in the report. The surveillance team concluded that the activities evaluated were adequate, satisfactorily implemented, and effective.

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

Sincerely,

M. Lea Chism  
 Quality Assurance Specialist

Enclosure

cc: w/enclosure  
 D. Gadbury, CBFO  
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 F. Sharif, WTS  
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ED	D. Winters, DNFSB	ED
ED	K. Martin, CTAC	ED
ED	N. Frank, CTAC	ED
ED	WIPP Operating Record	ED
ED	CBFO QA File	
ED	CBFO M&RC	

\*ED denotes electronic distribution



Other documents used or referenced during the surveillance were:

- 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 job hazard analysis activities were evaluated for both underground and operations:

Performance of job hazards analysis	Skill of Craft Notebooks (Zones 0, 2, 3, 4)
Work Orders not yet started	Work Orders in process
Work Orders completed	Work Orders with subcontractor involvement
RH Waste Handling automated JHAs (AJHAs)	

The surveillance team evaluated planned, current, and completed work performed on the surface and underground. Twenty-seven Work Order (WO) packages were reviewed in detail and determined to meet the requirements for developing, mitigating, and communicating job hazards to the people doing the work. Currently, three methods for identifying job hazards are in use: 1) Hazard Identification Checklist (HIC), 2) Hazard Identification Summary (HS), and 3) electronic AJHA process. The electronic AJHA process is primarily used for Skill of the Craft activities, while the HIC and HS are used by Crafts and the engineer during work area walk-downs to identify hazards prior to performance of work.

The surveillance team verified that each hazard identified had mitigating information and one or more Warnings in the associated WO or maintenance work instruction (MWI). Remote-handled (RH) waste handling operations used a combination of physical warnings (e.g., signs, barriers); procedure warnings, cautions, and notes; and personnel qualification and training to address their AJHAs.

The surveillance team verified that pre- and post-job briefings were held and documented in the WO. The pre-job briefing was supplemented/documentated in a WTS Integrated Safety Management (ISM) pre-briefing form that helped plan the pre-job briefing subjects. The surveillance team verified that subcontractor personnel had received required pre- and post-job briefings that were documented in the WTS WO. Weekly safety meetings were held by each group

interviewed during the surveillance. Each WO included a statement that personnel should stop/suspend work, when necessary.

The surveillance team reviewed work procedures for RH waste handling against their associated JHAs. Several JHAs did not refer to a procedure, and several procedures did not refer to the associated JHA. The JHA program is currently being transitioned and the requirement to cross-reference the JHA to the procedure is in the process of being implemented when the associated procedure comes up for periodic review. At this time, the RH waste handling procedures do not refer to the JHA, which are stand-alone documents (see Observation below).

One field-directed engineering change notice was identified in WO #1010068 and was completed on November 30, 2010.

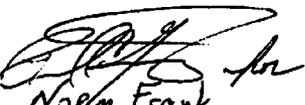
Training and qualification requirements were verified by review of the Skill of the Craft notebooks maintained by the Zone Maintenance Manager and by review of a qualification notebook maintained by the Operations RH Waste Handling Manager.

The surveillance team observed a walk-down of carbon tetrachloride measurements in the underground for hazard survey and identification.

**Results:**

The surveillance team identified one Observation during the surveillance. The RH waste handling procedures do not yet refer back to the associated AJHA. WTS plans to incorporate this reference at the next revision of each procedure.

Overall, the surveillance team found the program elements evaluated to be adequate in addressing applicable upper-tier requirements; satisfactorily implemented, and effective.

Surveillance Team Leader Signature:  for Norman Frank Date: 12/20/10

Assistant Manager/Office Director: N/A Date:                     

CBFO QA Director Approval Signature:  Date: 12-22-10