

United States Government

Department of Energy

memorandum

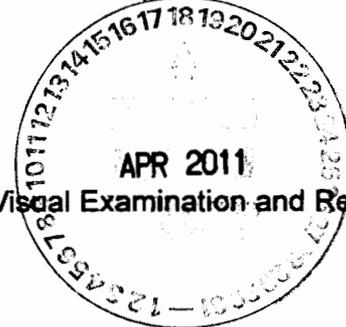
 Carlsbad Field Office
 Carlsbad, New Mexico 88221

DATE: APR 18 2011

REPLY TO
ATTN OF: CBFO:OQA:DSM:MAG:11-0518:UFC 2300.00

SUBJECT: Transmittal of Surveillance Report S-11-15 of the SNL/CCP Visual Examination and Remote-Handled Waste Sampling Processes

TO: James W. Todd, DOE-SNL



The Carlsbad Field Office conducted Surveillance S-11-15 of the Sandia National Laboratories Central Characterization Project (SNL/CCP) Visual Examination and Remote-Handled Waste Sampling Processes. The surveillance was conducted March 30-31, 2011. The surveillance report is attached.

The surveillance team concluded that the SNL/CCP technical and quality assurance programs for the remote-handled waste sampling process evaluated were adequate, satisfactorily implemented, and effective. During the visual examination process, the waste was determined not to match the waste stream targeted for this surveillance. When the appropriate waste is available, another surveillance will be scheduled.

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



Dennis S. Miehl
 Acting Director, Office of Quality Assurance

Attachment

cc: w/attachment

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*ED denotes electronic distribution

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CBFO SURVEILLANCE REPORT

Surveillance Number: S-11-15 **Date of Surveillance:** March 30 – 31, 2011

Surveillance Title: Sandia National Laboratories Central Characterization Project (SNL/CCP)
Visual Examination and Remote-Handled Waste Sampling Processes

Organization Surveilled: SNL/CCP

Surveillance Team:

Paul C. Gomez	Surveillance Team Leader, CBFO Technical Assistance Contractor (CTAC)
Jim Oliver	Technical Specialist, CTAC
Rhett Bradford	Technical Specialist, CTAC
Greg Knox	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 SNL/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 SNL/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 container P9800776 from 30-gallon drum #P1110154 during SNL/CCP activities in the SNL remote-handled (RH) waste Hot Cell Facility. The contents observed were examined and found to not be from the target waste stream identified as SNL-HCF-S5400-RH. The contents were opened and examined for prohibited items, none were found. The contents were contained in an aluminum clam-shell, stirred, and re-examined. No prohibited items were found. CCP started the process for a nonconformance report (NCR) for this container.

The surveillance team evaluated training records for two VE operators and the visual examination appointment documents for the operators performing VE activities at SNL. The training records reflect training to the current operating procedures and acceptable knowledge documentation for this site.

The team also reviewed batch data reports (BDRs) for visual examination. Reports RHSNLVE110001 and RHSNLVE110003 were reviewed and noted by the surveillance team that the BDRs were through project level at the time of this surveillance. The team notified the Site Project Manager (SPM) that the containers in BDR RHSNLVE110003 were not reported as consistent as the other BDR observed and was not completely traceable to the parent container in the BDR. **(See Observations)**

The team determined that the VE operations were satisfactory and procedures were effectively implemented. The activity for VE of the target waste stream will be scheduled at a later date.

Waste Sampling – Staff interviews were conducted and sampling activities within the Hot Cell Facility were observed to verify proper sample collection from container P9800776. 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 BDR preparation with completed independent technical review (ITR) and SPM review were evaluated. No concerns were found associated with this sampling activity.

Radiological sampling BDR SNRH1101 was reviewed by the team. The team found that the ITR checklist question number 22 was checked "Yes" for the quality assurance objective (QAO) for precision met for collection of a field duplicate. **(See Corrected During the Surveillance)**

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, and data management (the use of notebooks).

No issues were identified with training, reporting of nonconforming items, records management, control of procedures, and data management of notebooks. CCP had assigned a Vendor Project Manager (VPM) for SNL to review the logs. All QA protocols are followed and no issues have been expressed for both VE and radiological sampling.

Procedure Controls and Use – The CCP VE inspectors have limited access to electronic equipment while performing their respective duties at the SNL 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. No issues were identified with procedure control and use during the surveillance.

Control of Logbooks – The SNL RH waste program requires the use of logbooks to record daily activities and other pertinent activities that control the VE and sampling processes. The SNL/CCP RH program specifies CCP-PO-005, *CCP Conduct of Operations*, for control of CCP activities 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). No issues were identified with the control of logbooks during the surveillance.

Overall, the surveillance team determined quality assurance activities were adequate, satisfactory, and effective.

Governing Documents/Requirements:

Evaluation of the overall program adequacy and effectiveness of SNL/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-016, *CCP Control of Measuring and Testing Equipment*

Surveillance Results:

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

Corrective Actions:

None.

Observations:

One observation was identified concerning the visual examination reporting of the primary (parent) container in the comments section of the visual examination reporting forms. BDR RHSNLVE110003 did not contain this parent container information as this information was reported in the BDR RHSNLVE110001. This information aids in traceability from the data generation level to the project office.

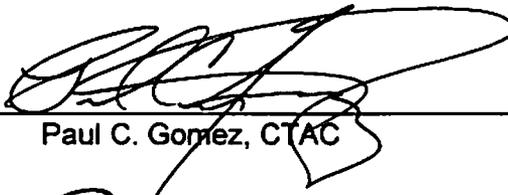
Corrected During the Surveillance:

One item was corrected during the surveillance concerning the Independent Technical Reviewer's Checklist for Radiological Sampling BDR SNRH1101 question 22 result for duplicate sample quality assurance objective. The result was originally recorded as "yes" and the correction made during the surveillance was completed to indicate "no" for this response.

Recommendations:

None.

Surveillance Team Leader:


Paul C. Gomez, CTAC

Date:

4/18/11

CBFO QA Director Approval:


Dennis S. Miehl, CBFO
Acting Director, Quality Assurance

Date:

4-18-11