



United States Government

Department of Energy

memorandum

Carlsbad Field Office

Carlsbad, New Mexico 88221



DATE: APR 21 2011

REPLY TO ATTN OF: CBFO:OQA:DSM:MAG:11-0533:UFC 2300.00

SUBJECT: Transmittal of Revised 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 revised surveillance report is attached to provide clarification. CBFO is rescinding the previously transmitted report.

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 examined 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

- | | | | |
|----------------------|-----|--------------------------------|----|
| M. Navarrete, CBFO | *ED | S. Ghose, EPA | ED |
| J. R. Stroble, CBFO | ED | R. Lee, EPA | ED |
| B. Mackie, CBFO | ED | S. Zappe, NMED | ED |
| C. Fesmire, 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 | P. Gilbert, LANL-CO | ED |
| A.J. Fisher, WTS/CCP | ED | G. Lyshik, LANL-CO | ED |
| M. Walker, WTS/CCP | ED | D. Toft, CTAC | ED |
| Y. Salmon, WTS/CCP | ED | R. Allen, CTAC | ED |
| J. Hoff, WTS | ED | P. Gomez, CTAC | ED |
| M. Mullins, WTS | ED | K.D. Martin, CTAC | ED |
| D. Rast, DOE-SNL | ED | WWIS Database Administrators | ED |
| M. Eagle, EPA | ED | WIPP Operating Record | ED |
| E. Feltcorn, EPA | ED | CBFO QA File | |
| R. Joglekar, EPA | ED | CBFO M&RC | |

*ED denotes electronic distrib



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 Summary Category Group S5000 remote-handled (RH) debris 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 container was opened and the contents were found not to be compliant with the anticipated SNL-HCF-S5400-RH waste stream. CCP started the process for a nonconformance report (NCR) for this container.

The surveillance team evaluated training records for two VE operators and the 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 surveillance team reviewed BDRs RHSNLVE110001 and RHSNLVE110003 and noted that the reports had been through project-level review at the time of the surveillance. The team notified the Site Project Manager (SPM) that the traceability of parent containers was not reported consistently in the BDRs. BDR RHSNLVE110003 did not contain the identification of the parent drum; however, this information is available in the AK Summary.

CCP had already started the process for an NCR for this information. The activity for VE of the SNL-HCF-S5400-RH waste stream will be scheduled at a later date.

Waste Sampling – Staff interviews were conducted and sampling activities in 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, and written records were found to be satisfactory. The team evaluated evidence of activities such as final BDR preparation with completed independent technical review (ITR) and SPM review. No concerns were found associated with waste sampling activities.

In reviewing radiological sampling BDR SNRH1101, the team found that the ITR checklist question number 22 was inaccurately checked “Yes” for the quality assurance objective (QAO) for precision met for collection of a field duplicate. This error was corrected during the surveillance, as described on page 3 of this report.

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 were followed and no issues were identified for either VE or 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/CCP 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, including those 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 that quality assurance activities were adequate, satisfactory, and effective.

Governing Documents/Requirements:

Evaluations of overall program adequacy and the effectiveness of SNL/CCP documents were 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 radiological sampling operations are adequate, satisfactorily implemented, and effective. The activity for VE of the SNL-HCF-S5400-RH waste stream will be scheduled at a later date.

Corrective Actions:

None.

Corrected During the Surveillance:

One item was corrected during the surveillance concerning the ITR's Checklist for Radiological Sampling BDR SNRH1101 question 22 for the duplicate sample quality assurance objective. The result was originally recorded as "Yes" and was corrected during the surveillance to indicate "No" for this response.

Recommendations:

None.

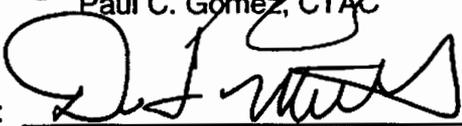
Surveillance Team Leader:



Paul C. Gomez, CTAC

Date: 4/21/11

CBFO QA Director Approval:



Dennis S. Miehl, CBFO
Acting Director, Office of Quality Assurance

Date: 4-21-11