



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



August 3, 2011

Mr. Jon E. Hoff, Manager
 Quality Assurance
 Washington TRU Solutions, LLC
 P.O. Box 2078
 Carlsbad, New Mexico 88221-2078

Subject: Notification and Plan for Surveillance S-11-22, WTS NESHAP Reporting

Dear Mr. Hoff:

The Carlsbad Field Office (CBFO) will conduct Surveillance S-11-22 of Washington TRU Solutions (WTS) National Emission Standards for Hazardous Air Pollutants (NESHAP) Reporting. The surveillance will be conducted on August 16-18, 2011 at the Waste Isolation Pilot Plant, in accordance with the enclosed surveillance plan.

You are requested to coordinate with the surveillance team to provide the appropriate space to conduct meetings, personnel necessary to support the surveillance, and access to the appropriate documentation, records, and facilities.

If you have any questions concerning this notification, please contact me at (575) 234-7483.

Sincerely,

Martin P. Navarrete
 Senior Quality Assurance Specialist

Enclosure

cc: w/enclosure

R. Unger, CBFO	*ED	S. Ghose, EPA	ED
D. Gadbury, CBFO	ED	R. Lee, EPA	ED
G. Basabilvazo, CBFO	ED	J. Kieling, NMED	ED
D. Miehl, CBFO	ED	S. Holmes, NMED	ED
M. Chism, CBFO	ED	T. Hall, NMED	ED
S. McCauslin, CBFO	ED	T. Kesterson, DOE OB WIPP NMED	ED
D. Ferguson, CBFO	ED	D. Winters, DNFSB	ED
F. Sharif, WTS	ED	B. J. Verret, CTAC	ED
M. A. Mullins, WTS	ED	M. Mager, CTAC	ED
T. Peake, EPA	ED	WIPP Operating Record	ED
M. Eagle, EPA	ED	CBFO QA File	
E. Felcorn, EPA	ED	CBFO M&RC	
R. Joglekar, EPA	ED	*ED denotes electronic distribution	



**CARLSBAD FIELD OFFICE
SURVEILLANCE PLAN**

Surveillance Number: S-11-22
Organization: Washington TRU Solutions LLC (WTS)
Date and Location of Surveillance: August 16 – 18, 2011
Waste Isolation Pilot Plant (WIPP) Site Offices
Surveillance Team: Martin P. Navarrete Management Representative, CBFO
B.J. Verret Surveillance Team Leader, CBFO Technical Assistance Contractor (CTAC)
Joe Field Auditor, CTAC
Jim Oliver Technical Specialist, CTAC

Surveillance Scope:

The surveillance will verify the adequacy and implementation of the WTS Quality Assurance Program with respect to sampling, data compilation, and reporting to maintain compliance with CBFO and federal requirements for National Emission Standards for Hazardous Air Pollutants (NESHAP) reporting activities in accordance with CBFO documents. The surveillance will also evaluate and verify the implementation and effectiveness of applicable WTS implementing procedures.

Activities to be Surveyed:

The following elements will be evaluated:

- Sampling
- Data Compilation
- Reporting

Governing Documents/Requirements:

Overall program adequacy of WTS documents will be assessed based on the following documents:

- DOE/WIPP-97-2238, Rev. 8, *Periodic Confirmatory Measurement Protocol for the Waste Isolation Pilot Plant*
- DOE/WIPP-10-2171, *Waste Isolation Pilot Plant Biennial Environmental Compliance Report*
- DOE/WIPP-99-2194, Rev. 3, *Waste Isolation Pilot Plant Environmental Monitoring Plan*
- 40 CFR Part 61, Subpart H, National Emission Standards for Emissions of Radionuclides Other Than Radon From Department of Energy Facilities

- WP 02-EM3004, Rev. 5, *Radiological Data Verification and Validation*
- WP 12-RC.01, Rev. 9, *Quality Assurance Program Plan for Sampling Emissions of Radionuclides to the Ambient Air at the Waste Isolation Pilot Plant*

Checklists will be developed from current revisions of the following WTS implementing procedures:

- WP 12-RE3004, Rev. 3, *Periodic Confirmatory Sampling Reporting and Compliance Activities*
- WP 12-RL1001, Rev. 10, *Sample Tracking and Custody*
- WP 12-RL1009, Rev. 5, *Gross Alpha and Gross Beta Activity in Air Filter, Soil, Water, Sludge, and Biota*
- WP 12-RL3002, Rev. 8, *Radiochemistry Laboratory Data Validation and Verification*
- WP 12-HP3500, Rev. 18, *Airborne Radioactivity*

Schedule of Surveillance Activities:

A pre-surveillance meeting is scheduled for 8:00 a.m., Tuesday, August 16, 2011, at the WTS offices at the WIPP site.

Management briefings will be held as needed at 8:30 a.m., Wednesday and Thursday, August 17 and 18, 2011, at the WTS offices at the WIPP site.

Surveillance activities will take place from 8:00 a.m. to 2:30 p.m., Tuesday through Thursday, August 16 – 18, 2011.

Lunch breaks during the surveillance will be between 11:00 a.m. and noon each day, or when team members are at a good stopping point.

Caucus meetings will be held at 3:00 p.m., Tuesday and Wednesday, August 16 and 17, 2011, and at 1:00 p.m., Thursday, August 18, 2011, at the WTS offices at the WIPP site.

A post-surveillance meeting will be held at 2:30 p.m., Thursday, August 18, 2011, at the WTS offices at the WIPP site.

Prepared by: B. J. Verret
B.J. Verret, CTAC
Surveillance Team Leader

Date: 8/2/11

Concurrence by: Martin P. Navarrete
Martin P. Navarrete, CBFO
Senior Quality Assurance Specialist

Date: 8-3-11