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Department of Energy
Carlsbad Field Office
P.O. Box 3090
Carlsbad, New Mexico 88221
AUG 25 2011



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

Subject: Surveillance Report S-11-22 for WTS NESHAP Activities

Dear Mr. Hoff:

The Carlsbad Field Office conducted a surveillance of the Washington TRU Solutions (WTS) National Emission Standards for Hazardous Air Pollutants (NESHAP) activities on August 16, 2011. The results of the evaluation are contained in the enclosed report.

No conditions adverse to quality were identified and no recommendations were submitted to WTS for management consideration.

If you have questions concerning the enclosed report, please contact me at (575) 234-7483.

Sincerely,

Martin P. Navarrete
Senior Quality Assurance Specialist

Enclosure

cc: w/enclosure

R. Unger, CBFO	* ED	J. Kieling, NMED	ED
D. Gadbury, CBFO	ED	S. Holmes, NMED	ED
C. Fesmire, CBFO	ED	T. Hall, NMED	ED
D. Ferguson, CBFO	ED	T. Kesterson, DOE OB WIPP NMED	ED
G. Basabilvazo, 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. Feltcorn, EPA	ED	CBFO M&RC	
R. Joglekar, EPA	ED	*ED denotes electronic distribution	
S. Ghose, EPA	ED		
R. Lee, EPA	ED		



CBFO SURVEILLANCE REPORT

Surveillance Number: S-11-22 **Date of Surveillance:** August 16, 2011

Surveillance Title: National Emission Standards for Hazardous Air Pollutants Activities (NESHAP)

Organization: Washington TRU Solutions (WTS)

Surveillance Team:

Management Representative	Martin Navarrete, Carlsbad Field Office (CBFO)
Team Leader	B. J. Verret, CBFO Technical Assistance Contractor (CTAC)
Team Member	Joe Field, CTAC
Team Member	Jim Oliver, CTAC

Surveillance Scope:

This surveillance was performed to verify the adequacy, implementation, and effectiveness of WTS NESHAP activities.

Surveillance Results:

The surveillance team determined that the WTS NESHAP procedures reviewed were adequate and that processes and associated activities were satisfactorily implemented and effective.

The surveillance was based on the current revisions of the following documents:

- WP 02-EM3004, *Radiological Data Verification and Validation*
- WP 12-RC.01, *Quality Assurance Program Plan for Sampling Emissions of Radionuclides to the Ambient Air at the Waste Isolation Pilot Plant*
- WP12-RL1016, *Operation of the Oxford Series 5XLB Gas Proportional Counter*
- WP 12-RE3004, *Periodic Confirmatory Sampling Reporting and Compliance Activities*
- WP 12-RL1001, *Sample Tracking and Custody*
- WP 12-RL3002, *Radiochemistry Laboratory Data Validation and Verification*
- WP 12-HP3500, *Airborne Radioactivity*

The following NESHAP activities were evaluated as related to the listed activities:

- Sampling
- Data Compilation
- Reporting
- Qualifications and Training

The surveillance team verified the WTS Waste Isolation Pilot Plant (WIPP) NESHAP program to be adequate, effective, and satisfactorily implemented. Records examined by the team were found to be completed in accordance with procedural requirements. The tasks associated with NESHAP were performed in accordance with procedural requirements.

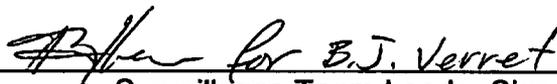
Entries for samples in the Radiochemistry Sample Tracking Logbook were visually verified for correctness. Both internal and external chain-of-custody forms were found to be properly documented and consistently used for sample transfers to and from the WIPP site to the Carlsbad Environmental Monitoring and Research Center (CEMRC) Laboratory in Carlsbad. At the laboratory, the chain-of-custody forms were found to be used consistently for internal tracking of multiple movements during the sample analysis process. It was visually verified that the samples are tracked through the Daily Work Log and the Sample Preparation Logbook.

Personnel qualifications and training were verified for staff radiological chemist, radiochemistry technician, and radiological technician performing sample collection. The sample meeting minutes from the meeting held on March 16, 2011, included a notation that preplanning meetings were held prior to the start of off-normal sample activities to discuss variation from normal analysis work.

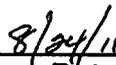
Annual NESHAP compliance reports were examined for 2008, 2009, and 2010 (latest available report), and were found to be acceptable. Data compilation, including forms used to log data and prepare the compliance reports, were examined and found to be complete, including required reviews and signatures.

Overall, the NESHAP activities performed by WTS were determined to be adequate, satisfactorily implemented, and effective.

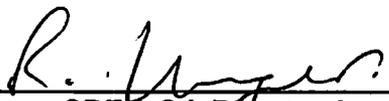
The surveillance team identified no conditions adverse to quality as a result of the surveillance, and provided no recommendations to WTS management.



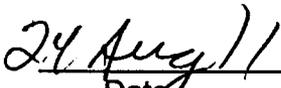
Surveillance Team Leader Signature



Date



CBFO QA Director Approval Signature



Date