



Department of Energy
 Carlsbad Field Office
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Mr. D. K. Ploetz, Manager
 Central Characterization Project
 Retrieval, Characterization and Transportation
 Washington TRU Solutions, LLC
 P.O. Box 2078
 Carlsbad, New Mexico 88221-2078

Subject: Transmittal of Surveillance Report for Surveillance S-11-25

Dear Mr. Ploetz:

The Carlsbad Field Office (CBFO) performed Surveillance S-11-25 of Washington TRU Solutions Central Characterization Project (CCP) Acceptable Knowledge (AK) Records on September 20-22, 2011. The surveillance team concluded that, overall, the CCP AK Records activities evaluated were adequate, satisfactorily implemented, and effective. One Corrective Action Report (CAR) was generated as a result of the surveillance and has been transmitted under separate correspondence. The results of the surveillance and conclusions of the surveillance team are provided in detail in the enclosed report.

If you have any questions concerning the enclosed report, please contact me at (575) 234-7548.

Sincerely,

Courtland G. Fesmire, P.E.
 Quality Assurance Engineer

Enclosure

cc: w/enclosure			
R. Unger, CBFO	*ED	R. Lee, EPA	ED
J. R. Stroble, CBFO	ED	J. Kieling, NMED	ED
F. Sharif, WTS	ED	S. Holmes, NMED	ED
M. A. Mullins, WTS	ED	T. Hall, NMED	ED
J. Hoff, WTS	ED	T. Kesterson, DOE OB WIPP NMED	ED
M. Sensibaugh, 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
Y. Salmon, WTS/CCP	ED	G. White, CTAC	ED
J. Carter, WTS/CCP	ED	C. Riggs, CTAC	ED
T. Peake, EPA	ED	M. Mager, CTAC	ED
M. Eagle, EPA	ED	WIPP Operating Record	ED
E. Feltcorn, EPA	ED	CBFO QA File	
R. Joglekar, EPA	ED	CBFO M&RC	
S. Ghose, EPA	ED	*ED denotes electronic distribution	



CBFO SURVEILLANCE REPORT

Surveillance Number: S-11-25 **Date of Surveillance:** September 20 - 22, 2011

Surveillance Title: Central Characterization Project (CCP) Acceptable Knowledge (AK) Records

Organization: CCP

Surveillance Team:

Charles L. Riggs	Team Leader, Carlsbad Field Office (CBFO) Technical Assistance Contractor (CTAC)
Courtland Fesmire	CBFO Quality Assurance Representative
Cindi Castillo	Team Member, CTAC
Katie Martin	Team Member, CTAC
Harley Kirschenmann	Team Member, CTAC

Surveillance Scope:

Surveillance S-11-25 was conducted as a follow-up to CBFO Corrective Action Report (CAR) 11-043, which identified that some of the required AK documents pertaining to the Idaho National Laboratory (INL) were missing in the CCP Records files.

The surveillance team evaluated the adequacy, implementation, and effectiveness of the CCP collection and storage of the AK source documents and applicable forms.

Surveillance Results:

The surveillance team determined that, overall, the CCP AK Records activities evaluated were adequate, satisfactorily implemented, and effective. The evaluation was based on the following documents.

- *CBFO Quality Assurance Program Document (QAPD), DOE/CBFO-94-1012*
- *Hazardous Waste Facility Permit for the Waste Isolation Pilot Plant, EPA No. NM4890139088-TSDF, New Mexico Environment Department*
- *CCP Records Management, CCP-QP-008*
- *CCP Records Filing, Inventorying, Scheduling, and Dispositioning, CCP-QP-028*
- *CCP Acceptable Knowledge Documentation, CCP-TP-005*

The surveillance resulted in the issuance of CAR 11-051 identifying lack of attention to detail when processing AK documentation. The surveillance team also had one Observation and provided management with two

Recommendations. The CAR, Observation, and Recommendations are described in detail below.

Activities Evaluated:

The surveillance of the CCP AK Records was conducted September 20 through 22, 2011. The surveillance team reviewed hard copy records at the Waste Isolation Pilot Plant (WIPP) Records Archive and electronic records in the CCP Project Office at the Skeen-Whitlock Building in Carlsbad, New Mexico. The surveillance team reviewed the AK supporting documentation for 24 AK Summary Reports. The AK Summary Reports and number of source documents reviewed are detailed in Attachment 2. Attachment 1 lists the personnel contacted during the surveillance.

A total of 2,239 source documents out of possible 5,076 were examined. It was noted that there appears to be a disconnection between the CCP Records Department/Management and the AK Experts as to who has the onus of ensuring that submitted records are full and complete. Since there is no formal acceptance criteria for these records, it is imperative that both sides work together to ensure that the best possible information is in the files.

During the evaluation of CCP-AK-ORNL-001, Rev. 7, a listed source document (M208) could not be located in the CCP Records files. After a discussion with the AK Manager, objective evidence was provided to show that M208 did not exist and that the designation was used only as a placeholder for container paperwork and container evaluation memos for newly generated waste from Nuclear Fuel Services, Inc., scheduled to start shipping to Oak Ridge National Laboratory (ORNL) this year, which did not take place. An email from the AK Expert to the AK Manager stated that if CCP ever returns to ORNL, they will add this new waste, and documentation will be submitted formally. A freeze file has been annotated to make changes to the next revision of CCP-AK-ORNL-001, and any references to this source document will be deleted at that time.

The surveillance team noted several cases where records had been misfiled and/or improperly marked as "Superseded." These were corrected as soon as they were brought to the attention of the records clerks.

Overall, the CCP AK Records activities were determined to be adequate in addressing upper-tier requirements, satisfactory in implementation of these requirements, and effective in achieving the desired results.

Corrective Action Report:

Lack of attention to detail when processing Acceptable Knowledge (AK) documentation:

1. CCP-AK-INL-005, Rev. 5

- a) Source document P227, Plutonium Mass Fractions Derived From SGRS Data, records file is missing page 1.
- b) The AK Summary Report lists two entries for source document P052, each identifying a different source document: Backlog Waste Reassessment Baseline Book, Organics WF19, and Backlog Waste Reassessment Baseline Book, Solidified Organics WF47.

2. CCP-AK-INL-018, Rev. 1

- a) Attachment 3 documentation (referring to Acceptable Knowledge Source Document Summary, Attachment 3 to CCP-TP-005, *CCP Acceptable Knowledge Documentation*) for source documents C098 and C099 are available in the CCP Records Center, but these source documents are not listed on the AK Summary Report.
- b) Attachment 3 identifies the date of source document C111 as 1/7/2004, the record file copy is dated 11/29/2004, and the AK Summary Report identifies the date as 7/20/2004.
- c) Source document P073 is identified as "Expert Review of SGS Data, WCP-41, Rev. 1, 1/07/2004" on the AK Summary Report and as "WIC-31, Rev. 3, 7/28/09" on Attachment 3.
- d) The AK Summary Report identifies the source document P001 as "Transuranic Waste Baseline Inventory Report Database, Rev. 2.1," dated 1/1/2003; however, the electronic file document is "WTWBIR WS ID LL-T002," dated 3/24/2004. Also, WS ID LL-T002 is not identified on the CH Waste Stream listing used by the Records Center.

3. CCP-AK-INL-023, Rev. 0

- a) Attachment 3 identifies source document C009 author (Davis) and date (12/6/06) but the source document in the records file has no such information and is not marked as C009.
- b) Source document C014 is identified as C012 in the records file.
- c) Source documents D002 and DR001 are not identified with their source document numbers.
- d) Submittals to the electronic records database for source documents C007, C011, and C012 included an Attachment 3 for the same waste stream, but at another site (LA-OS-00-05). A correct copy of each Attachment 3 is in the hard copy files in the Records Center.

Observation and Recommendations:

Observation 1:

There exists a lack of traceability of documentation between Attachment 3, Acceptable Knowledge Source Document Summary, and the Acceptable Knowledge Summary Report.

1. Reference CCP-AK-INL-001, Rev. 10: The title of the source document TRA-P001 on Attachment 3 differs from the title of the source document on the Acceptable Knowledge Summary Report listing.

Attachment 3 lists the title as "Verification and Updating of the Radioactive Waste Management Information System for the Inactive TRU and Non-TRU Pits and Trenches at the Radioactive Waste Management Complex Subsurface Disposal Area (Volumes I and II)," while the Acceptable Knowledge Summary Report identifies the document as "ETR Operations Branch Progress Report for Cycle no. 87."

2. Reference CCP-AK-INL-005, Rev. 5:

- a) Attachment 3 identifies the source document P052 as "Backlog Waste Reassessment Baseline Book, Waste Form 52, Combustibles"; however, the CCP AK Summary Report references the "Backlog Waste Reassessment Baseline Book for Waste Form 19, Organics," and the record file contains the Baseline Book for Waste Form 19.
- b) The CCP Acceptable Knowledge Summary Report identifies source document P064 as "WO-4034-F," while Attachment 3 identifies the title of the source document as "WO-434-F."

Recommendation 1:

Pen and ink changes have been made to Attachment 3 forms (Acceptable Knowledge Source Document Summary) that have not been incorporated into the Acceptable Knowledge Report. Recommend that these pen and ink changes be incorporated into the report.

Recommendation 2:

Many of the documents on the WIPP Garrison Server require delving through several pages in order to find any identifying information that confirms that it is the document identified on Attachment 3. Recommend placing the referenced item first to make the files more user friendly.

Attachments:

Attachment 1: Personnel Contacted During the Surveillance
Attachment 2: Documents Evaluated

Surveillance Team Leader Signature: *Charles L. Riggs* Date: 10/3/11
Charles L. Riggs

Assistant Manager/Office Director: N/A Date: N/A

CBFO QA Director Approval Signature: *R. Unger* Date: 19 Oct 11

PERSONNEL CONTACTED DURING THE SURVEILLANCE				
NAME	ORGANIZATION	PRE-MEETING	CONTACTED DURING	POST-MEETING
Allen, Randall	CTAC, QA Manager			X
Armijo, Cheryl	Stoller/CCP, Records Clerk		X	
Cannon, Val	WTS/CCP, QAM			X
Fisher, A. J.	WTS/CCP, Training	X		X
Greenwood, Trey	CCP/TechSpecs, AK		X	X
Keathley, Suzanne	Stoller/CCP, Records Clerk		X	
Pearcy, Mark	WTS/CCP, SPM			X
Pearcy, Sheila	Stoller/CCP, Records Mgr.	X	X	X
Stone, Keith	WTS/CCP			X
Turner, Sheriee	Stoller/CCP, Records Clerk		X	

Documents Evaluated			
AK Summary	Revision Number	Source Documents Evaluated	Total Number of Source Documents
CCP-AK-INL-001	10	100	850
CCP-AK-INL-005	5	100	129
CCP-AK-INL-018	1	100	241
CCP-AK-INL-021	2	100	150
CCP-AK-INL-023	0	33	33
CCP-AK-BAPL-500	2	100	109
CCP-AK-LANL-011	1	88	88
CCP-AK-LANL-013	3	100	193
CCP-AK-ORNL-001	7	100	148
CCP-AK-ORNL-009	0	100	263
CCP-AK-SRS-7	5	100	324
CCP-AK-SRS-13	0	76	76
CCP-AK-INL-570	1	110	185
CCP-AK-LANL-500	4	117	438
CCP-AK-ORNL-510	0	111	208
CCP-AK-SNL-500	2	100	191
CCP-AK-SRS-12	4	58	58
CCP-AK-SRS-500	6	101	390
CCP-AK-RL-109	1	67	67
CCP-AK-RL-114	1	83	83
CCP-AK-ANLE-500	7	100	378
CCP-AK-INL-590	0	100	108
CCP-AK-RL-500	0	100	271
CCP-AK-SRS-580	2	95	95
TOTALS	-	2239	5076