Subject: Surveillance Report S-11-24, WTS Commercial Grade Item Dedication Program

Dear Mr. Hoff:


Two Corrective Action Reports were issued as a result of the surveillance, as described in the report. The surveillance team concluded that, with the exceptions noted, the activities evaluated were adequate, satisfactorily implemented, and effective.

If you have any questions concerning this report, please contact me at (575) 234-7459.

Sincerely,

Richard Farrell
Quality Assurance Specialist

Enclosure

cc: w/enclosure
R. Unger, CBFO
A. Holland, CBFO
M. Navarrete, CBFO
E. Preciado, CBFO
F. Sharif, WTS
M. A. Mullins, WTS
T. Peake, EPA
M. Eagle, EPA
E. Feltcorn, EPA
R. Joglekar, EPA
S. Ghose, EPA

*ED R. Lee, EPA
ED J. Kieling, NMED
ED T. Hall, NMED
ED S. Holmes, NMED
ED T. Kesterson, DOE OB WIPP NMED
ED D. Winters, DNFSB
ED M. Mager, CTAC
ED N. Frank, CTAC
ED WIPP Operating Record
ED CBFO QA File
ED CBFO M&RC

*ED denotes electronic distribution
CBFO SURVEILLANCE REPORT

Surveillance Number: S-11-24  Date of Surveillance: August 23 – 24, 2011

Surveillance Title: WTS Commercial Grade Item Dedication Program

Organization: Washington TRU Solutions, LLC (WTS)

Surveillance Team:

Martin Navarrete  Carlsbad Field Office (CBFO) Management Representative
Norman Frank  Team Leader, CBFO Technical Assistance Contractor (CTAC)
Harley Kirschenmann  Team Member, CTAC

Surveillance Scope:

The surveillance evaluated the adequacy, implementation, and effectiveness of the WTS Commercial Grade Item (CGI) Dedication Program.

Surveillance Results:

The surveillance team determined that the WTS CGI Dedication Program, with the exceptions noted below, was adequately documented, satisfactorily implemented, and effective.

Activities Evaluated:

The following activities were evaluated:

<table>
<thead>
<tr>
<th>Document Number</th>
<th>Document Title</th>
</tr>
</thead>
<tbody>
<tr>
<td>WP 09-CN3040</td>
<td>Commercial Grade Item Dedication</td>
</tr>
</tbody>
</table>

Additional procedures included as referenced by WP 09-CB3040:

<table>
<thead>
<tr>
<th>Document Number</th>
<th>Document Title</th>
</tr>
</thead>
<tbody>
<tr>
<td>WP 09-CN3005</td>
<td>Graded Approach</td>
</tr>
<tr>
<td>WP 15-PC3609</td>
<td>Purchase Requests</td>
</tr>
<tr>
<td>WP 15-PM3518</td>
<td>Material Receiving</td>
</tr>
</tbody>
</table>

Corrective Actions:

As a result of this surveillance, Corrective Action Reports (CARs) 11-048 and 11-049 were issued under separate cover to WTS. The CARs are summarized below.
CAR 11-048
The critical characteristics verification methods identified in Form EA09CN3040-1-0, section 2, Commercial Grade Dedication Plan, lack detail sufficient to specify the activities needed to verify the critical characteristics. See CGI 10-003, TRUPACT III Forklift and ISO Container Fixture; CGI 11-001, Bulkhead Steel; and CGI 10-004a and b, SLB2 Handler Forklift and Puller.

CAR 11-049
There was no evidence to demonstrate that two suppliers (CGI 11-001 and 10-003) could provide adequate and accurate certificates of conformance (C of C) for materials and items supplied. Review of one C of C (CGI 10-003) showed that the WTS form was not properly completed by the supplier, i.e., specifications and requirements were marked as N/A, yet the C of C was accepted.

Observations
1. The phrase “Commercial Grade Item Dedication,” or the acronym “CGID,” was not entered into the Purchase Requisition (PR) Line Item Comments of PRs written for purchase of applicable CGIs. For example: PR 413700, TRUPACT III Handler Forklift and ISO Container Fixture; PR 415061, Bulkhead Steel; and PR 413836, SLB2 Handler.
NOTE: PRs 413700 and 413836 did contain this information in another part of the PR.

2. The survey team noted inconsistencies in the controlling procedure, WP 09-CN3040, Rev. 0. These need to be addressed to prevent future concerns. For example, Sampling is in section 1 of form EA09CN3040-1-0, but is discussed in step 3.1[E] for section 2; the PR Number and the Source/Receiving Inspection Verification Sheet (SRIVS) Number used for acceptance need to be identified in section 3 of form EA09CN3040-1-0; there is insufficient clarity to identify the verification methods by number and the activities that support these methods.

Surveillance Team Leader: Norman C. Frank Date: 11/1/11

Assistant Manager/Office Director: N/A Date: 

CBFO QA Director: Randy Unger Date: 11-2-2011