



ENTERED

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



FEB 29 2012

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

Subject: Surveillance Report S-12-12, Washington TRU Solutions Regulatory and Environmental Services Permittee Waste Confirmation Process

Dear Mr. Hoff:

The Carlsbad Field Office performed the subject surveillance at the Skeen-Whitlock Building in Carlsbad, NM, and at the Idaho Waste Confirmation Facility in Idaho Falls, ID, February 14 – 16, 2012. The surveillance team concluded that the overall status of the program is adequate, satisfactorily implemented, and effective. No conditions adverse to quality were identified during the surveillance. The details of the surveillance and conclusions of the surveillance team are provided in the enclosed surveillance report.

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

Sincerely,

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

Enclosure



Mr. Jon E. Hoff

-2-

FEB 29 2012

cc: w/enclosure
R. Unger, CBFO *ED
G. Basabilvazo, CBFO ED
A. Holland, CBFO ED
E. Preciado, CBFO ED
M.F. Sharif, WTS ED
M. A. Mullins, WTS ED
T. Peake, EPA ED
M. Eagle, EPA ED
E. Feltcorn, EPA ED
R. Joglekar, EPA ED
S. Ghose, EPA ED
R. Lee, EPA ED
J. Kieling, NMED ED
T. Kliphuis, NMED ED
S. Holmes, NMED ED
R. Maestas, NMED ED
T. Hall, NMED ED
T. Kesterson, NMED/DOE OB ED
J. Marple, NMED/DOE OB ED
D. Winters, DNFSB ED
P. Y. Martinez, CTAC ED
M. Mager, CTAC ED
WIPP Operating Record ED
CBFO QA File
CBFO M&RC

*ED denotes electronic distribution

CBFO SURVEILLANCE REPORT

Surveillance Number: S-12-12 **Date of Surveillance:** February 14 – 16, 2012

Surveillance Title: Washington TRU Solutions Regulatory and Environmental Services (WTS/RES) Permittee Waste Confirmation Process

Organization Evaluated: WTS/RES

Surveillance Team:

Priscilla Y. Martinez	Surveillance Team Leader, CBFO Technical Assistance Contractor (CTAC)
Earl Bradford	Surveillance Team Member, CTAC
Paul Gomez	Surveillance Team Member, CTAC
Rhett Bradford	Surveillance Team Member, CTAC

Observer:

Ricardo Maestas	New Mexico Environment Department (NMED)
-----------------	--

Surveillance Scope:

The scope of the surveillance was to verify the adequacy and implementation of WTS/RES Waste Confirmation activities in Carlsbad, NM, and Idaho Falls, ID. The surveillance team also evaluated and verified the effectiveness of applicable WTS implementing procedures.

Activities Evaluated:

The surveillance team verified the processes and procedures associated with the confirmation of the waste destined for the Waste Isolation Pilot Plant (WIPP). The Carlsbad-based confirmation team performs confirmation of shipments from the Hanford Site, Savannah River Site (SRS), Los Alamos National Laboratory (LANL), and Oak Ridge National Laboratory. The Idaho-based confirmation team performs confirmation of shipments for the Idaho National Laboratory (INL) and Advanced Mixed Waste Treatment Project (AMWTP).

The surveillance team selected and verified completeness of waste confirmation data packages for eight shipments from years 2010, 2011, and 2012. Included were reviews of both real-time radiography (RTR) and visual examination (VE) records for confirmation of 55-gallon drums, 100-gallon drums, ten-drum overpacks, and standard waste boxes. These represented confirmation of containers from seven different waste streams shipped from the INL and 15 different waste streams shipped from the SRS, LANL, and the Argonne National Laboratory, which were reviewed by the surveillance team. The surveillance team also reviewed a sample of the associated video media and VE records from the selected confirmation data

packages and verified that the randomly selected containers from each shipment accurately represented the waste streams included in the shipments.

In addition, the surveillance team witnessed real-time confirmation activities related to the initial confirmation of waste shipments IN120026, IN120027, and LA120015 that have been identified by the WIPP Waste Data System (WDS) as being ready for confirmation. The surveillance team witnessed the selection of the random sample of shipment containers, observed an operator reviewing the RTR records, and observed the proper initiation of the documentation supporting the confirmation process. Verification was performed to make sure the waste contained no ignitable, corrosive, or reactive waste and to ensure that the physical characteristics of the transuranic (TRU) mixed waste corresponded with its waste stream description. In addition, the surveillance team witnessed the independent reviews, independent observer (IO) and independent technical reviewer (ITR) activities required for the confirmation of the containers for shipment.

The surveillance team verified the procedural process of the Permittees Confirmation Representative (PCR) wherein the package is assembled and disseminated for review by the operator, the IO, the ITR, and the PCR.

The surveillance team verified that the selected confirmation data packages were accurate and complete and concluded that the WTS/RES RTR and VE confirmation activities were adequate, satisfactorily implemented and effective.

Work Control Practices:

The surveillance team verified the Carlsbad and Idaho confirmation teams maintain hard copies of implementing procedures in their offices. The surveillance team also verified that confirmation team members have computer access to electronic copies of implementing procedures. The surveillance team verified that all procedures were up-to-date and had effective dates assigned, and that current revisions were being used. In addition, the surveillance team verified that each of the confirmation team members had completed required reading of the most recently revised procedure (WP 02-RC1105, Rev. 11, effective 02/09/12).

The surveillance team verified through interview with the PCR that no issues have been identified by the confirmation team that warranted notification of nonconformance and/or the issuance of a Carlsbad Field Office (CBFO) corrective action report (CAR). The surveillance team verified the confirmation team is fully aware of the process for processing a CAR, when necessary.

The surveillance team concluded that the work control practices were adequate, satisfactorily implemented, and effective.

Training:

The surveillance team verified that each of the Carlsbad and Idaho confirmation team members was qualified to perform his/her duties. In addition, the surveillance team verified that the personnel performing confirmation activities on the selected confirmation data packages were appropriately trained and qualified. The surveillance team verified that the confirmation team members are included in the RES List of Qualified Individuals. The training files for operator, IO, ITR and PCR personnel were verified by the surveillance team. All training records are maintained by WTS at the WIPP site. Training records were reviewed to verify that each individual met the requirements of Hazardous Waste Facility Permit Attachments C7 and F1.

The surveillance team concluded that the training records requirements for the confirmation team members were adequate, satisfactorily implemented, and effective.

Documents and Records:

The surveillance team verified that the records generated while performing the waste confirmation process are identified and maintained in accordance with procedures. The surveillance team verified that the appropriate records were included in the confirmation data packages and were transmitted in accordance with procedures. The surveillance team verified the waste confirmation records and final disposition requirements are listed in the WTS/RES Records Inventory and Disposition Schedule (RIDS). The surveillance team verified the confirmation data packages reviewed included the appropriate records and the records were legible, accurate, and complete. Records are maintained in Fire King locked cabinets located at the WIPP site.

The surveillance team concluded that document and record control processes were adequate, satisfactorily implemented, and effective.

Software Quality Assurance:

The surveillance team verified through interview with the Idaho Confirmation Manager that there are no computer programs owned and controlled by the Idaho-based confirmation team. The surveillance team verified the Idaho confirmation team accesses the AMWTP Waste Tracking System for information relative to shipments and the computer program is owned and maintained by the AMWTP. The surveillance team verified that WTS controls and maintains the WDS per WTS procedures.

The surveillance team in Carlsbad verified the presence of the Confirmation Module in the WIPP WDS. The Confirmation Module is used by the PCR as a tool for random selection of the shipments to be completed through the confirmation processes. The surveillance team interviewed WDS software control personnel and

verified software version control and access control for the software that generates the random selection. The random selection is based on seven percent of the waste stream in the shipment. The software version was last updated May 18, 2011, under requirement WWIS2-REQ-1135.

The surveillance team determined the random selection software to support the confirmation processes is adequate, satisfactorily implemented, and effective.

Governing Documents/Requirements:

Evaluation of overall program adequacy and effectiveness of Permittee Waste Confirmation process documents was based on the current revisions of the following documents:

- WIPP Hazardous Waste Facility Permit NM 4890139088-TSDF
 - Attachment C7, Permittee Level TRU Waste Confirmation Processes
 - Attachment F1, RCRA Hazardous Waste Management Job Titles and Descriptions
- WP 02-RC.11, *Qualification and Certification of NDE Personnel Performing Radiography for TRU Waste Confirmation*
- WP 02-RC.12, *Qualifications of Personnel Performing Visual Examination or TRU Waste Confirmation*
- WP 02-RC.13, *Conduct of Operations for TRU Waste Confirmation*
- WP 02-RC1101, *Visual Examination for TRU Waste Confirmation*
- WP 02-RC1102, *Review of Radiography Media for TRU Waste Confirmation*
- WP 02-RC1103, *Radiography Inspection Operating Procedure for TRU Waste Confirmation*
- WP 02-RC1105, *Electronic Notification, Container Selection, and Data Entry for TRU Waste Confirmation*
- WP 02-RC1107, *Management of Nonconforming Waste Identified During TRU Waste Confirmation*
- WP 02-RC1108, *Review of Visual Examination Records for TRU Waste Confirmation*
- WP 16-2, *Software Screening and Control*

Surveillance Results:

The results of the surveillance indicate that the WTS/RES Permittee Waste Confirmation activities are adequately established for compliance with upper-tier requirements, satisfactory in the implementation of those requirements, and effective in achieving the desired results.

Corrective Actions:

None

Observations:

None

Corrected During the Surveillance:

None

Recommendations:

None

Surveillance Team Leader: Priscilla Y. Martinez Date: 2-28-12
Priscilla Y. Martinez, CTAC

CBFO QA Director Approval: R. Unger Date: 29 Feb 12
Randy Unger, CBFO
Director, Office of Quality Assurance