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Department of Energy
Carlsbad Field Office
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APR 24 2012



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

Subject: Corrected Surveillance Report S-12-15, WTS 10 CFR Part 71, Subpart H, Quality Assurance Program (Type B Containers)

Dear Mr. Hoff:

The Carlsbad Field Office conducted Surveillance S-12-15 of Washington TRU Solutions (WTS) 10 Code of Federal Regulations (CFR) Part 71, Subpart H, Quality Assurance Program (Type B Containers), at the Skeen-Whitlock Building on April 3, 2012. There were two editorial errors in the initial report in paragraph two of the Surveillance Results: 1) instead of "TRUPACT-II Package" at the end of the name of TP2-QGR-0001, the initial report had "RHOTRU 72B" and 2) there was an extra "S" after the "Q" for 72B-QGR-0001. These errors have been corrected in this revision of the surveillance report.

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

Sincerely,

Richard Farrell
Quality Assurance Specialist

Enclosure

cc: w/enclosure

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E. Feltcorn, EPA	ED	WIPP Operating Record	ED
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CBFO SURVEILLANCE REPORT

Surveillance Number: S-12-15

Date of Surveillance: April 3, 2012

Surveillance Title: Washington TRU Solutions (WTS) 10 CFR Part 71, Subpart H, Quality Assurance Program (Type B Containers)

Organization: WTS

Surveillance Team:

B.J. Verret	CBFO Technical Assistance Contractor (CTAC) Team Leader
Rick Castillo	CTAC Team Member

Surveillance Scope:

Verify adequacy and WTS implementation of Title 10 Code of Federal Regulations (CFR) Part 71, Subpart H, Quality Assurance Program, as applied to Type B containers. Evaluate and verify the implementation and effectiveness of WTS implementing procedures.

Activities Evaluated:

The following elements, as related to the Type B Packaging, were evaluated:

- Document Control (Type B Drawings)
- Design
- Test Control
- Quality Assurance Records (Type B Containers)
- Supplier Qualifications

Surveillance Results:

Document control was reviewed by the surveillance team. WTS utilizes a Document Compliance Manager program to initiate documents, track documents through review and issuance, and ensure only current revisions of procedures are used.

Two major Type B design and test control documents have been completely revised and issued as new Revision 0 documents: TP2-QGR-0001, *Q-List and Quality Category Assessments for the TRUPACT-II Package*, issued in January 2012, and 72B-QGR-0001, *Q-List and Quality Category Assessments for the RH-TRU 72B*, issued in November 2011. The surveillance team determined that these documents adequately address the requirements of 10 CFR Part 71, Subpart H.

Quality Assurance records were reviewed by the surveillance team. The current Quality Assurance records system for controlling Type B packages (TRUPACT-II,

HalfPact, and 72B) has not changed since the last surveillance, and the records are being controlled in accordance with WTS procedures.

The surveillance team evaluated qualification documentation for suppliers of items and services that must comply with the requirements of 10 CFR Part 71, Subpart H. The suppliers reviewed during the surveillance were Rainier Rubber Company and the Government Technical Services Division Engineered Products Division (GTSD/EPD). Both companies were confirmed to be listed as current 10 CFR Part 71, Subpart H suppliers, and placed on the WTS Qualified Supplier List (QSL) per procedural requirements.

The surveillance team verified the suppliers' audits and annual evaluations were compliant with applicable WTS procedures. The surveillance team evaluated Audits E11-01 and E09-04, annual evaluations, and Type B Packaging Maintenance Oversight Daily Reports to help confirm compliance with procedural requirements.

To date, WTS has not performed any commercial grade dedication of items for 10 CFR Part 71, Subpart H applications. WTS is currently in the planning stage for a new order of O-rings for the TRUPACT-II and RH 72B packages. WTS indicated to the surveillance team that they may purchase these O-rings as commercial grade items and perform the dedication.

The surveillance team determined that the WTS 10 CFR Part 71, Subpart H, Quality Assurance Program, is adequate. The WTS procedures reviewed were found to be satisfactorily implemented and effective.

Corrective Actions:

No issues were identified during the surveillance that required corrective action.

Surveillance Team Leader: B. J. Verret Date: 4/19/12

CBFO QA Director Approval: R. Unger Date: 4-24-2012
for R. Unger