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



MAY 21 2012

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

Subject: Transmittal of Surveillance Report S-12-19, WTS Environmental Safe Drinking Water Program

Dear Mr. Hoff:

The Carlsbad Field Office (CBFO) conducted a surveillance of the Washington TRU Solutions (WTS) Safe Drinking Water Program at the Waste Isolation Pilot Plant on May 8, 2012. The surveillance team concluded that the WTS Environmental Safe Drinking Water Program is adequate, effective, and satisfactorily implemented for compliance with applicable upper-tier requirements.

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

Sincerely,

Richard F. Farrell
Quality Assurance Specialist

Enclosure

cc: w/enclosure

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

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CBFO SURVEILLANCE REPORT

Surveillance Number: S-12-19 **Date of Surveillance:** May 8, 2012

Surveillance Title: Washington TRU Solutions (WTS) Environmental Safe Drinking Water Program

Organization: Washington TRU Solutions, LLC

Surveillance Team:

Richard Farrell	Management Representative, Carlsbad Field Office (CBFO), Office of Quality Assurance (QA)
Erin Preciado	Management Representative, CBFO QA
Cindi Castillo	Team Leader, CBFO Technical Assistance Contractor (CTAC)
Paul Gomez	Team Member, CTAC
Tom Kesterson	Observer, New Mexico Environment Department (NMED)

Purpose:

The surveillance was performed to evaluate the WTS Environmental Safe Drinking Water Program at the Waste Isolation Pilot Plant (WIPP) for compliance with National Primary Drinking Water Regulations as specified in Title 40 CFR Part 141.

Scope:

The scope of the surveillance was to evaluate the WTS Environmental Safe Drinking Water Program implementing procedures for compliance to applicable upper-tier requirements documents, examine supporting documentation and training records, observe water sampling activities, and interview water sampling personnel.

Basis:

The surveillance was based on the applicable requirements specified in current revisions of the following governing documents:

DOE/CBFO-94-1012, CBFO Quality Assurance Program Document

WTS WP 13-1, Rev. 31, Washington TRU Solutions LLC Quality Assurance Program Description

Title 40 CFR Part 141, National Primary Drinking Water Regulations

WP 12-IS1001, Rev. 5, Chlorine Sampling of WIPP Drinking Water

WP 12-IS1002, Rev. 5, Coliform Sampling of WIPP Drinking Water

WP 02-EC1002, Rev. 6, Lead and Copper Sampling of WIPP Drinking Water

Activities Evaluated:

The surveillance team reviewed documentation resulting from implementation of the WTS Environmental Safe Drinking Water Program, interviewed WTS environmental personnel, and observed sampling activities at the WIPP site on May 8, 2012. The surveillance team also reviewed quality records and sampling team qualifications and verified quality records were adequately managed, and sampling personnel were qualified as required.

Coliform Sampling

The surveillance team evaluated the results of data collected from WIPP drinking water samples for coliform content. The sampling for coliform content is performed once a month, as directed in 40 CFR, Part 141, and in the NMED Regulations Governing Water Supplies. Two coliform samples are taken. One sample is taken for routine testing and is drawn from a designated location at the site. For this surveillance, the sample was drawn from the tap in Trailer 918B. The second sample is considered a compliance sample. The compliance sample for this surveillance was taken from the drinking water pump house source valve. The location of the sample points is changed on a monthly basis.

The surveillance team reviewed the microbiological analysis request form, as documented and completed on Microbiological Water Report RW-456-V-052, for May 8, 2012. For the sampling, two pre-sterilized 125 ml screw-cap plastic bottles are supplied by the City of Carlsbad Water and Wastewater Laboratory. The bottles are pre-marked "WP-1" and "WP-2" by the Laboratory. The sampler produced the Chain of Custody Chronicle and transported the samples to the Laboratory in compliance with chain-of-custody requirements.

The qualifications of the sampling personnel were reviewed and verified to be compliant with upper-tier requirements.

The surveillance team reviewed documentation produced while performing the sampling procedure and verified procedures were effectively implemented.

Chlorine Sampling

The surveillance team evaluated the activities for chlorine sampling and analysis. The surveillance team evaluated results of these activities, as completed and documented on the Chlorine Sampling Log. This log contains the free and total chlorine levels after analysis using the Colorimeter Hach Model DR/820. The surveillance team verified the instrument is calibrated annually and adequately labeled. The concentrations of free and total chlorine are documented in the Chlorine Sampling Log and shown to be within acceptable levels. The surveillance team also examined the DPD (N, N-diethyl-p-phenylene-diamine) Free and Total Chlorine Reagents (in powder pillow/foil packets), which were properly identified and labeled with an expiration date. The container holding the foil packets identified the type of DPD chlorine reagent with a

material safety data sheet database number, a catalog number, and the same expiration date as the foil packets.

The surveillance team verified the free and total chlorine analysis procedure is adequate, satisfactorily implemented, and effective in achieving the desired results.

Lead and Copper Sampling

There were no ongoing lead and copper sampling and analysis activities during this surveillance. The surveillance team evaluated the contents of the Environmental Analysis/Lead and Copper Logbook, including completed quality records for lead and copper sampling, and analysis activities for 11 samples collected on August 18, 2011. The records included a Metals Analytical Request Form, Sample Chain of Custody Record, Request for Analysis form, and the results of the analysis as documented in a Laboratory Analytical Report from CBFO to the NMED. The records folder is maintained in a two-hour fire-rated cabinet. The surveillance team also verified matching sampling information in the Site Environmental Compliance Sampling Field Logbook. Results of the analysis for the 11 samples noted that the lead and copper content were within acceptable levels.

The surveillance team verified qualification cards for three personnel responsible for collecting lead and copper samples. These were signed and dated by the subject matter expert.

The records and observations noted for these sampling activities were in compliance with procedural requirements. The records are appropriately maintained in accordance with records requirements.

Conclusion:

The results of the surveillance indicate that the WTS Environmental Safe Drinking Water Program remains adequate for compliance with upper-tier requirements, satisfactorily implemented, and effective.

Surveillance Team Leader: Cindi Castillo Date: 5/11/12
Cindi Castillo

CBFO QA Management Representative: Richard Farrell Date: 5/16/2012
Richard Farrell