

Allen, Pam, NMENV



From: Maestas, Ricardo, NMENV
Sent: Wednesday, July 11, 2012 11:52 AM
To: Allen, Pam, NMENV
Subject: FW: Audit Concerns Summary for Thursday Management Briefing
Attachments: A-12-13 Audit Concerns Summary.docx

WIPP file

From: Tamara Bowden [<mailto:tbowden@portageinc.com>]
Sent: Wednesday, June 13, 2012 5:26 PM
To: william.verlanic@amwtp.inl.gov; court.fesmire@wipp.ws; Berry Pace - CTAC; Susan (Danette) Harvill - CTAC; robertbb@id.doe.gov; wellsjl@id.doe.gov; mike.sensibaugh@wipp.ws; Maestas, Ricardo, NMENV; Holmes, Steve, NMENV; tom.morgan@wipp.ws; Joe Harvill - CTAC; randall.allen@wipp.ws
Subject: Audit Concerns Summary for Thursday Management Briefing

I have attached the audit concerns summary for the Thursday Management Briefing at 8:30.

Bill,

Will you please make copies again?

Thanks,

Tammy

Please consider the environment before printing this e-mail.

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A-12-13
INL/CCP RECERTIFICATION AUDIT
JUNE 11 – 14, 2012

No	Who	Description of Concern	Requirements Comments
1	P. Gomez	<p>NDE Batch RTR5110051 objective evidence indicates that the SPM validation was initially completed without inclusion of an NCR that was associated with a container in the batch, SNL.NM006398R.</p> <p>NCR-INL-2041-11 was initiated by an SPM on 5/13/11 against SNL/NM006398R. The NCR was dispositioned on 5/16/11. Corrections dictated by the NCR were completed in the BDR and the ITR checklist on 5/16/11. A second SPM signed the validation checklist on 5/19/11 with question #6 which asks if there were NCRs associated with the batch answered as "no." A third SPM changed the answer to question #6 on 6/9/11.</p>	<p>CCP-TP-001, Rev. 19, "CCP Project Level Data Validation and Verification," Section 4.2.1 requires that the following steps be included when initiating a BDR review:</p> <p>[E.3] Compare NCRs included in the BDR to the NCRs in the P-TS, if applicable</p> <p>[E.4] IF any NCRs are missing from the P-TS OR DO NOT match those entered into the P-TS for the BDR, THEN contact the NCR Coordinator, AND resolve the problem.</p>
2	P. Gomez	<p>In NDE Batch RTR5110085 objective evidence the radiographer indicated under Container Inventory and Comments that drum ND1081R contains metal framed HEPA filters. Section 4, Packaging Materials and Waste Material Parameters report did not indicate the presence of any metal material.</p> <p>In this instance, an item that was identified in the description was not included as an estimated material parameter weight.</p>	<p>CCP-TP-001, Rev. 19, CCP Project Level Data Validation and Verification, Attachment 2, Questions 21 and 22 are as follows:</p> <p>21. Does the BDR include an estimate of each material parameter weight in kg for each container?</p> <p>22. Does the BDR include a description of each material parameter for each container?</p>
3	P. Gomez	<p>Inter-Office Correspondence CP:11:01336 objective evidence which documents the headspace gas random selection process for waste streams ID-SA-T001, ID-SNL-SOURCES-S5400, and ID-SNL-HCF-S5400 used language inconsistent with procedural requirements and did not address all procedural requirements.</p> <p>In the Objective Evidence Inter-Office Correspondence CP:11:01336 contains the following Subject Line and paragraph. There are no additional attachments or tables associated with the letter. Bold text indicates areas where language is inconsistent with procedure.</p> <p><i>"SUBJECT: 100 PERCENT HEADSPACE GAS SAMPLING IN LIEU OF RANDOM SELECTION FOR WASTE STREAMS ID-SA-T001, ID-SNL-SOURCES-S5400 AND ID-SNL0HCF-5400</i></p> <p><i>Based on the small waste stream sizes of ID-SA-T001, ID-SNL-SOURCES-S5400 and ID-SNL-HCF-S400, Central Characterization Project (CCP) has opted to Headspace Gas</i></p>	<p>ADDITIONAL INFORMATION HAS BEEN PROVIDED TO THE AUDIT TEAM TO RESOLVE THE CONCERN. THEREFORE, CONCERN #3 IS BEING WITHDRAWN.</p> <p>CCP-TP-162, Rev. 1, "CCP Random Selection of Containers for Solids and Headspace Gas Sampling and Analysis" Section 4.2.8 requires that the SPM creates a Solids Random Selection Memorandum or Headspace Gas Random Sample Selection Memorandum, as applicable to the following information as a minimum:</p> <p>.....</p> <ul style="list-style-type: none"> The population size (number of containers in the waste stream RS lot) from which containers have been selected for Solids or HSG sampling

A-12-13
INL/CCP RECERTIFICATION AUDIT
JUNE 11 – 14, 2012

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		<p><i>Sample all drums in the waste streams rather than perform a random selection. This meets the criteria of CCP-PO-001 C2-1b Statistical Selection of Containers for Headspace Gas Analysis. If any of the waste streams were to exceed ten drums, CCP will continue to Headspace Gas Sample all drums in the waste stream rather than perform a random selection of the containers per CCP-TP-162.</i></p>	<p>and analysis.</p> <ul style="list-style-type: none"> • The quantity of containers selected for Solids or HSG sampling and analysis and number of containers identified as contingency selections. • Identification of all containers within the entire population of the waste stream RS lot with their associated random numbers. <p>CCP-TP-162, Rev. 1, "CCP Random Selection of Containers for Solids and Headspace Gas Sampling and Analysis" Section 4.2 has a NOTE containing the following: "For the initial sample selection for a HSG waste stream RS lot, n will equal ten. For HSG waste streams with fewer than ten containers, the entire waste stream will be characterized in one lot and all containers will be HSG sampled."</p>
4	P. Gomez	<p>NDE Batch RTR5110051 objective evidence indicates that the initial SPM who completed the validation was not familiar with the AK for waste stream ID-SNL-SOURCES-S5400 specifically the AK concerning the use of vermiculite as a packaging material in container SNL/NM006398R.</p>	<p>ADDITIONAL INFORMATION HAS BEEN PROVIDED TO THE AUDIT TEAM, TO RESOLVE THE CONCERN. THEREFORE, CONCERN #4 IS BEING WITHDRAWN.</p>

A-12-13
INL/CCP RECERTIFICATION AUDIT
JUNE 11 – 14, 2012

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5	R. Bradford C. Castillo	<p>VE Operators completing BDR INLRHVE11003 did not follow Step 4.1.2, Section F, G, & H of CCP-TP-500. BDR INLRHVE11003, Containers FF-45A, B, C were signed by VE Operator 1 on 8/8/11 and by VE Operator 2 on 6/28/11.</p> <p>Additionally...On Attachment 1 for containers FF-45A & FF-45B, the wrong procedure is referenced. The procedure should be "CCP-TP-500" BUT is listed as "CPP-TP-500."</p>	<p>REVISED CCP-TP-500, Rev. 11, Section 4.1.2:</p> <p>[F] IF VE of the container can NOT be completed by the original qualified operators that started the waste container for any reason, THEN STOP and notify the VE Expert.</p> <p>[G] Complete comment section of on Attachment 1, initial and date comments. New qualified operators SHALL initial and date comments for acceptance of waste previously placed into the waste container.</p> <p>[H] IF different qualified operators resume or complete the VE the operators will start a separate Attachment 1 at step 4.1.2[D], THEN completed Attachment 1 per CCP-TP-500, CCP Remote-Handled Waste Visual Examination.</p>
6	R. Bradford C. Castillo	Attachment 1 of CCP-TP-006 does not provide a field to record the waste streams listed in CCP-AK-INL-001, yet SPMs & ITRs are required to verify that the correct waste streams are listed on the VE Data Form. Summary Category Groups are listed instead of appropriate waste streams.	CCP-TP-006, Rev. 16, Attachment 2, VE ITR Checklist #21, "Was the correct waste stream and waste matrix code assigned?"
7	R. Morrison T. Putnam G. Knox	Maintenance Record 12-047 was completed on 6/8/12. According to DOE/WIPP 02-3183, CH Packaging Program Guidance, Section 5.6.2, "...shall be sent immediately after maintenance activities are completed." This record has not been sent to Packaging Maintenance Engineer.	DOE/WIPP 02-3183, Rev. 6, Section 5.6.2
8	R. Morrison T. Putnam G. Knox	CH Operators were working on TRUPACTS following DOE/WIPP 02-3184 and were installing O-rings in Section 2.10. The operators installed all four O-rings, then signed off on steps, then verification signed off all four steps. Procedure says to install O-rings one at a time.	<p>REVISED</p> <p>DOE/WIPP 02-3184, Section 2.10, and Second Note right under Step 2.0 on page 37 of Rev. 11.0.</p>
9	R. Morrison T. Putnam G. Knox	The bag for the spare part 2077-180-06 did not have the description on the bag. The bag had 7 washers in it and the bag was written on with the part number and PO number.	<p>REVISED</p> <p>DOE/WIPP 02-3183, CH Packaging Program Guidance, Section 2.4, "The parts package will be labeled with part number, description, WIPP purchase order number, and shelf-life expiration date, if applicable."</p>

A-12-13
INL/CCP RECERTIFICATION AUDIT
JUNE 11 – 14, 2012

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10	B. Pace R. Riggs	Training qualification card documentation that are submitted to NMED and for public access are marked: <i>Private Information</i> <i>Authorized Personnel Only</i> <i>Controlled Disposal is Required</i>	
11	B. Pace R. Riggs	Training qualification card documentation that is submitted to NMED and for public access have been copied on a color copier and the "ORIGINAL" stamp is in color (either red or blue). It is difficult to determine if these documents are the "original" or a "copy" of the original.	
12	D. Blauvelt K. Martin	Approximately 250 drums of waste were added to waste stream ID-RF-S3114 since the previous audit. The AK Summary, CCP-AK-INL-005 R5 and AK attachment 8, the waste containers list, were updated. However an Add-Containers memo as called for in CCP-TP-005 S4.10 has not been prepared.	Auditor was provided with objective evidence. CDA
13	P. Martinez C. Riggs	A container number was incorrectly recorded in the Batch Narrative on BDR # INRTR5110094 for container 10046232, the container was recorded as 1004632, on 8/22/11. On 8/23/11, the ITR reviewed the BDR and recorded "yes" on the ITR checklist question #10, "is all data recorded clearly, legibly, and accurately?"	CCP-TP-508, R7, Section 4.9.2, "Review the BDR to the criteria in the checklist of Attachment 3, AND complete Attachment 3"
14	P. Martinez C. Riggs	The ITR reviewed BDR INLRHRTR11006 and recorded "N/A" to ITR checklist questions 8 & 9, "Are all changes to original data lined out, initialed, and dated?" and "Were data changes made by the individual who originally collected the data or individual authorized to change the date?" on 8/8/11. A change was made in the comment section on the RTR Data Sheet for container #NRFTRUSPC074-1 on 8/2/11.	CCP-TP-508, R7, Section 4.9.2, "Review the BDR to the criteria in the checklist of Attachment 3, AND complete Attachment 3"
15	P. Martinez C. Riggs	The ITR reviewed BDR INLRHRTR12002 and recorded "yes" to ITR checklist question #7, "Is all data recorded clearly, legibly, and accurately?" on 3/1/12. The BDR # was not correctly recorded on the RTR Data Sheet for container # ANLE33G, on 2/28/12. Note: The BDR # was corrected on 3/7/12.	CCP-TP-508, R7, Section 4.9.2, "Review the BDR to the criteria in the checklist of Attachment 3, AND complete Attachment 3"
16	P. Martinez C. Riggs	The NCR initiator recorded "See Attachment 1" in Block 3 of NCR-INL-3173-11 to record container numbers. The container numbers affected by the NCR were recorded on Attachment 2. The NCR initiator recorded "(See Attachment 1) on Block 7c as well.	CCP-QP-005, Section 4.1.1 ADDITIONAL INFORMATION HAS BEEN PROVIDED TO THE AUDIT TEAM, TO RESOLVE THE CONCERN.

A-12-13
INL/CCP RECERTIFICATION AUDIT
JUNE 11 – 14, 2012

No	Who	Description of Concern	Requirements Comments
			THEREFORE, CONCERN #16 IS BEING WITHDRAWN.
17	D. Blauvelt K. Martin	The AK Audit team examined the AK record for five distinct waste streams representing the five CH and RH Summary Category Groups. In reviewing the AK Summaries (AKS) for these waste streams, the auditors identified language that could be modified/supplemented to provide clarification to the documents. These changes were discussed and agreed upon and will become part of freeze files for each respective AKS. Examples are included in the attachment to this concern form. A complete listing will be provided at or before the final audit caucus.	<p>SAMPLES AK Summaries Freeze Files</p> <p><u>CCP-AK-INL-001 R11</u></p> <ol style="list-style-type: none"> 1. Modify language in S4.3.2 to indicate that spent nuclear fuel was not disposed of the SDA undergoing excavation <p><u>CCP-AK-INL-005 R5</u></p> <ol style="list-style-type: none"> 1. Clarify language in S5.4.1.2 regarding the use of RTR data to develop the waste material parameter weight estimate. 2. Insert footnote to explain the negative radionuclide numbers listed in table 5-2 3. Convert the AK Reevaluation Checklist cited in S5.4.3 p34 to an AK Source Document <p><u>CCP-AK-INL-022 R1</u></p> <ol style="list-style-type: none"> 1. Provide specific information in S4.3.1 on the rationale for considering these sources to be defense waste. 2. Provide information on the storage of out-of-use sources prior to the repackaging effort. 3. Provide additional summary information in S4.4 regarding the use of the sources at SNL. 4. Remove/change old definition of a waste stream in S4.5.3 <p><u>CCP-AK-INL-570 and CCP-AK-INL-590</u></p>

A-12-13
INL/CCP RECERTIFICATION AUDIT
JUNE 11 – 14, 2012

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			1. Remove language from both documents that indicate that the permit requires the assignment of HWNs if there is a lack of analytical evidence....
18	D. Blauvelt K. Martin	AK attachment 5, Hazardous Constituents, for waste stream IN-ID-BTO-030 is inconsistent with the information in the AK Summary for this waste stream. Acetone, n-butanol and methanol should be listed on attachment 5 as expected. In addition, the hazardous constituents expected in this waste stream that are potentially flammable should be listed in the appropriate section of attachment 5	CDA
19	P. Martinez C. Riggs	The RH RTR (RH-RTR-01, Rev. 3) Qualification Card for an operator did not have Block 4 under "Additional Training Requirements" filled in.	CCP-QP-008, Rev. 19, Sec. 3.7.1, CCP Personnel: Each individual who creates records must verify the record(s) are legible, accurate, and complete, appropriate to the work accomplished.