



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

APR 05 2013

 ENTERED



Mr. Jon E. Hoff, Manager
Quality Assurance
Nuclear Waste Partnership, LLC
P.O. Box 2078
Carlsbad, NM 88221-2078

Subject: Transmittal of Audit Report for Audit A-13-06

Dear Mr. Hoff:

The Carlsbad Field Office (CBFO) performed Audit A-13-06 of the Nuclear Waste Partnership, LLC waste-handling operations program, March 12 – 14, 2013. The audit team concluded that the overall status of the program is adequate, satisfactorily implemented, and effective.

The audit team identified four concerns during the audit that were determined to be condition adverse to quality. One concern was determined to be a violation of Contact-Handled (CH) TRUPACT-II packaging procedures and was documented in CBFO Corrective Action Report (CAR) 13-014, which was transmitted under separate correspondence.

The remaining three concerns, all relating to documentation issues, were determined to be isolated occurrences and were corrected during the audit (CDA). Two of these concerns were identified during CH TRUPACT-II packaging activities on the surface and one concern was found during remote-handled waste emplacement activities in the underground. Details of the audit, conclusions of the audit team and details of CAR 13-014 and the three CDAs are documented in the enclosed report.

If you have any questions, please contact me at (575) 234-7483.

Sincerely,

Martin Navarrete
Senior Quality Assurance Specialist

Enclosure



Mr. Jon E. Hoff

-2-

APR 05 2013

cc: w/enclosure

J. Franco, CBFO

*ED

M. Navarrete, CBFO

ED

D. Miehl, CBFO

ED

D. Gadbury, CBFO

ED

J. Waters, CBFO

ED

F. Sharif, NWP

ED

M. A. Mullins, NWP

ED

T. Peake, EPA

ED

L. Bender, 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. Kesterson, NMED/DOE OB

ED

J. Marple, NMED/DOE OB

ED

D. Winters, DNFSB

ED

M. Mager, CTAC

ED

G. White, CTAC

ED

G. Knox, CTAC

ED

WIPP Operating Record

ED

CBFO QA File

CBFO M&RC

*ED denotes electronic distribution

**U.S. DEPARTMENT OF ENERGY
CARLSBAD FIELD OFFICE**

AUDIT REPORT

OF

AUDIT NUMBER A-13-06

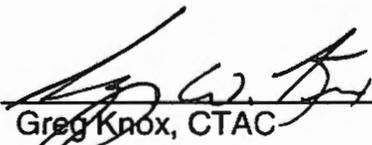
March 12 – 14, 2013

**NUCLEAR WASTE PARTNERSHIP LLC
WASTE-HANDLING OPERATIONS PROGRAM**

CARLSBAD, NEW MEXICO



Prepared by:


Greg Knox, CTAC
Audit Team Leader

Date:

4 APR 2013

Approved by:


Dennis Miehl, CBFO
Acting Quality Assurance Director

Date:

4-5-13

1.0 EXECUTIVE SUMMARY

Carlsbad Field Office (CBFO) Audit A-13-06 was conducted March 12 – 14, 2013, to evaluate the adequacy, implementation, and effectiveness of quality assurance (QA) and technical activities related to waste-handling operations at the Waste Isolation Pilot Plant (WIPP). The activities were evaluated with respect to the requirements defined in DOE/CBFO-94-1012, *CBFO Quality Assurance Program Document (QAPD)*; DOE/WIPP 02-3183, *CH Packaging Program Guidance*; DOE/WIPP 02-3184, *CH Packaging Operations Manual*; DOE/WIPP 02-3283, *RH Packaging Program Guidance*; DOE/WIPP 02-3284, *RH Packaging Operations Manual*; DOE/WIPP 02-3214, *RH TRU Waste Program Implementation Plan*; DOE/WIPP 11-3456, *TRUPACT-III Program Guidance*; DOE/WIPP 02-3122, *Waste Acceptance Criteria*; and WP 13-1, *Washington TRU Solutions, LLC, Quality Assurance Program Description*.

The audit team concluded that overall, the Nuclear Waste Partnership LLC (NWP) Waste-handling Operations Program continues to adequately address applicable upper-tier requirements and remains satisfactorily implemented and effective.

The audit team identified four conditions adverse to quality (CAQs) during this audit. One CAQ, identified during contact-handled (CH) waste packaging activities, was determined to be a procedural violation and was documented as CBFO Corrective Action Report (CAR) 13-014. Three CAQs were determined to be isolated occurrences and were corrected during the audit (CDA), as discussed in section 6 of this report. No Observations or Recommendations were identified during the audit.

2.0 SCOPE

2.1 Scope

The scope of the audit included evaluation of the NWP Waste-handling Operations Program procedures and records, and performance of quality-affecting activities. The following areas were evaluated.

Contact-handled and Remote-handled Waste-handling Operations

- Program and Procedure Adequacy
- Waste Receipt
- Preoperational Inspections
- Packaging Operations
- Contact-handled Waste-handling Operations
- Remote-handled Waste-handling Operations
- Waste Data System
- Magnesium Oxide
- Training and Qualification
- Measuring and Test Equipment
- Nonconformances
- Records

- Work Processes

Evaluation of NWP procedures for adequacy was based on DOE/CBFO-94-1012, *CBFO Quality Assurance Program Document*.

3.0 AUDIT TEAM

Martin Navarrete	Quality Assurance Management Representative, Carlsbad Field Office (CBFO)
Greg Knox	Audit Team Leader, CBFO Technical Assistance Contractor (CTAC)
Rick Castillo	Auditor, CTAC
Priscilla Y. Martinez	Auditor, CTAC
Randall Allen	Auditor, CTAC
Katie Martin	Auditor, CTAC
Kirk Kirkes	Auditor, CTAC
B. J. Verret	Technical Specialist, CTAC
Joe Willis	Technical Specialist, NWP

4.0 AUDIT PARTICIPANTS

Individuals contacted during the audit are identified in Attachment 1. A pre-audit conference was held in the WIPP Support Building large conference room on March 12, 2013. The audit was concluded with a post-audit conference in the WIPP Support Building large conference room on March 14, 2013.

5.0 SUMMARY OF AUDIT RESULTS

5.1 Program and Procedure Adequacy

Since the previous CBFO audit of waste-handling operations at the WIPP site (Audit A-11-16, performed August 30 – September 1, 2011), NWP has assumed the management and operations contract (M&O) at the WIPP. The management team has not changed and there has been no significant change to the program as a result of the new M&O contract award. The audit team concluded that the applicable NWP waste-handling operations activities, as described in the associated NWP waste-handling operations implementing procedures, are satisfactory in meeting the requirements of the CBFO QAPD.

The following sections identify each of the quality program elements evaluated during the course of this audit. For each element, the audit team evaluated the associated implementing procedures to verify the adequate flow-down of upper-tier requirements, conducted interviews with responsible personnel, and reviewed randomly selected records to determine the degree to which the NWP Waste-handling Operations Program is effectively implemented.

Four CAQs were identified during this audit. One CAQ was determined to be a procedural violation and was documented as CBFO Corrective Action Report (CAR) 13-014.

Three CAQs were identified during CH waste packaging activities. Two of these were determined to be isolated occurrences and were corrected during the audit (CDA). The third CAQ was identified during underground operations and was determined to be an isolated occurrence, which was also CDA. These issues are discussed further in the applicable sections and in section 6. No Observations or Recommendations were identified during the audit.

NWP implementing procedures included in the audit are identified in Attachment 2. Attachment 3 provides a summary of the audit results. Details of the audit are contained in the following sections.

5.2 Quality Assurance Program Audit Details

5.2.1 Waste Receipt

The audit team evaluated CH and RH transportation operations for waste received at the WIPP. The evaluation included interviews with responsible personnel, examination of receipt and empty container shipping documents for HalfPACT, TRUPACT-II and TRUPACT-III containers and RH 72-B canisters, and examination of measuring and test equipment (M&TE) to verify current calibration. Documentation for arriving TRUPACT-II units 141, 166, 179, and 208, arriving TRUPACT-III shipping containers 004 and 006, and arriving RH 72-B canisters in shipment INL12044, sent from Idaho National Laboratory (INL), were examined and found to be satisfactory.

Overall, the requirements for waste receipt were determined to be adequately established for compliance with upper-tier requirements, satisfactory in the implementation of these requirements, and effective in achieving the desired results. No concerns were identified.

5.2.2 Preoperational Inspections

The audit team evaluated the completion of pre-operational checks and inspections, as well as equipment associated with NWP RH and CH waste-handling activities on the surface and in the underground. Evaluations were performed utilizing personnel interviews and reviews of documentation, records and operational/equipment logbooks. Personnel performing pre-operational inspections and waste-handling activities were verified to be currently qualified as waste-handling technicians/engineers.

Records maintenance/storage was verified to ensure logbooks and other pertinent records are being maintained as quality records in accordance with the CBFO QAPD.

Preoperational/operational checks and inspections were verified to be performed for the following:

- TRUDOCK Pre-Operational Checks as described in WIPP Procedure (WP) 05-WH1002
- CH/RH Waste-handling Abnormal Operations as described in WP 05-WH1058 and WP 05-WH1758
- CH Surface Transuranic Mixed Waste Handling Area Inspection as described in WP 05-WH1101
- Conveyance Loading Car as described in WP 05-WH1406
- Adjustable Center of Gravity Lift Fixture (ACGLF) as described in WP 05-WH1410
- Facility Cask and Facility Cask Rotating Device as described in WP 05-WH1713
- RH Cask Preparation Station as described in WP 05-WH1714
- 25-Ton Cask Unloading Room Crane as described in WP 05-WH1719
- RH Surface Transuranic Mixed Waste Handling Area Inspection as described in WP 05-WH1744
- RH Closed-Circuit TV System as described in WP 05-WP1757
- 25-ton bridge crane, 140/25-ton remote handling crane, 2.5-ton JIB crane, 6-ton bridge cranes (B, C, D), 13-ton electric forklift (D), 6-ton electric forklift (B), and 25-ton bridge crane

In addition to the logbooks and in-process inspection sheets, the audit team randomly selected completed inspection sheets that had been submitted to Records to ensure accurate and consistent completion of required inspections.

Procedural implementation was verified during CH and RH waste-handling operations on the surface, and the audit team verified that pre-operational checks were documented in the appropriate logbooks at that time. M&TE calibration was verified for both CH and RH processes. Calibration information was provided to the audit team for tool crib checkout and date verification.

Implementation of underground inspection procedures was verified through review of the following documents:

- WP 05-WH1810 Attachment 1 – Preoperational Underground TRU Mixed Waste Disposal Area Inspections
- WP 05-WH1810 Attachment 2 – Preoperational Waste Handling Mode Checklist
- WP 05-WH1723 Attachment 1 – Preoperational Underground RH TRU Mixed Waste Disposal Area Inspections
- WP 05-WH1723 Attachment 2 – Preoperational Waste Handling Mode Checklist.

Also included in order to meet mode requirements for waste-handling activities were the preoperational checks for the CH underground transporters, CH 6-ton forklifts, RH 20-ton diesel forklift, RH 41-ton diesel forklift, RH 6-ton diesel forklift, and Horizontal Emplacement and Retrieval Equipment (HERE). The audit team verified preoperational checks were completed prior to waste-handling activities. Verification of the waste-handling engineer review and signature in the equipment logbooks was also performed.

The audit team concluded that the requirements for preoperational inspections and equipment for CH and RH waste on the surface and in the underground are adequately established for compliance with upper-tier requirements, satisfactory in the implementation of these requirements, and effective in achieving the desired results.

5.2.3 Packaging Operations

The audit team evaluated packaging operations for HalfPACT, TRUPACT-II and TRUPACT-III containers and RH 72-B canisters processed on the surface at the WIPP. Evaluation of packaging processes included unloading, inspections of packaging, minor maintenance, and preparation of empty packaging for return shipment.

The audit team observed the disassembly and unloading of TRUPACT-II units 141, 166, 179, and 208. The team also observed TRUPACT-III container and enclosed standard large box 2 (SLB2) handling operations on 3/14/2013. RH canister handling operations were observed 3/12/2013 and 3/13/2013 for canisters 00-12 and 00-04, respectively.

Documents and logbooks were reviewed and verified for maintenance activities, inventory control of packaging spare parts, calibration of associated M&TE, container maintenance, and container loading and unloading. Personnel training and qualification records were evaluated.

The audit team observed the performance of maintenance Work Instruction CH.13 for TRUPACT-II unit 166 (Job #13-021). Additionally, the inspection and reassembly was observed for TRUPACT-II units 141 and 166 for empty shipment. Documentation for outgoing empty TRUPACT-III shipments MTSR12088 and MTSR313001 were examined and found to be satisfactory. Documentation for outgoing empty RH shipment MTINR13001 was examined and found to be satisfactory.

During the course of the CH packaging evaluation, three concerns were identified. Concern 1 was identified during observation of packaging activities for empty TRUPACT-II containers being shipped to the generator sites. The audit team observed that multiple crews omitted testing one of the two ports on the inner containment vessel (ICV) for air flow, as required by procedure. This concern is documented as CBFO CAR 13-014.

Concern 2 was identified during review of the TRUPACT-II maintenance log. The team found that the log did not contain copies of all the maintenance records as required by procedure. The team reviewed additional logs and determined this to be an isolated occurrence. The missing copies were obtained and the log was corrected and verified prior to the end of the audit. This concern is documented as CDA 1.

Concern 3 was also identified during the review of the TRUPACT-II maintenance documents. The team noted that a TRUPACT-II maintenance record contained an incorrect date. The team reviewed additional maintenance records and determined the issue to be an isolated occurrence. The record was corrected and verified before the end of the audit. This concern is documented as CDA 2.

See section 6 for detailed descriptions of the CAR and CDAs.

The audit team concluded that the requirements for Packaging Operations for both CH and RH waste are adequately established for compliance with upper-tier requirements, satisfactory in the implementation of these requirements, and effective in achieving the desired results.

5.2.4 Contact-handled Waste-handling Operations (Surface and Underground)

The audit team observed waste-handling operations for HalfPACT and TRUPACT-II containers received at the WIPP and processed on the surface. Evaluation of waste operations processes included waste receipt, unloading, inspections of packaging, minor maintenance, and preparation of empty packaging for return shipment. The disassembly and unloading of TRUPACT-II units 141, 166, 179, and 208 was observed.

Auditors examined documentation, conducted interviews with waste-handling personnel, reviewed maintenance log books and copies of completed maintenance records, reviewed M&TE calibration due dates, and reviewed personnel training and qualification records. The auditors also verified CBFO approval and current revisions of procedures in use.

The audit team evaluated TRUPACT-III waste-handling operations for waste received at the WIPP. During the evaluation, the auditors examined documentation, conducted interviews with responsible personnel, observed TRUPACT-III waste-handling activities, and examined documents related to waste receipt and shipping of empty TRUPACT-III containers. The audit team observed TRUPACT-III waste-handling activities as they were performed. Logbooks were reviewed for maintenance activities and use of current revisions of procedures was verified.

Procedural implementation was verified during underground CH waste emplacement conducted on March 14, 2013. The audit team witnessed the downloading of the facility pallet that included four SWBs from shipments LA130011 and LA130012. Spotters and Radcon support were utilized during the removal of the pallet from the waste hoist onto the underground transporter and then to Panel 6, room 3. The SWBs

were then emplaced into the active stack in rows 29 and 30. A magnesium oxide (MgO) supersack was then placed on the top of Row 30. Attachments 1 and 3 of WP 05-WH1025, *CH Waste Downloading and Emplacement*, were completed and an update to the underground map was performed. Additional verification of attachments 1 and 3 of WP 05-WH1025 was performed in Records. The CH technician/operator/performer, reviewer, and validator signatures were verified, as well as individual qualifications.

The audit team concluded that the requirements for surface and underground Contact-handled Waste-handling Operations were adequately established for compliance with upper-tier requirements, satisfactory in the implementation of these requirements, and effective in achieving the desired results. No concerns were identified.

5.2.5 Remote-handled Waste-handling Operations (Surface and Underground)

The audit team evaluated RH waste-handling operations for waste received at the WIPP. The evaluation included interviews with responsible personnel, observation of RH waste-handling activities, and examination of documents related to receipt and empty shipping of RH 72-B canisters. The audit team observed RH waste-handling activities being performed. Logbooks were reviewed for maintenance activities and use of current revisions of procedures was verified.

Documentation for arriving INL RH shipment INL12044 was examined and found to be satisfactory. Documentation for outgoing empty shipment MTINR13001 was examined and found to be satisfactory. Waste-handling operations were observed 3/12/2013 and 3/13/2013 for RH canisters 00-12 and 00-04.

The audit team performed document reviews, including evidence for the calibration of associated M&TE, container maintenance, container loading and unloading, and personnel training and qualification records.

During the course of the RH transportation evaluations, no concerns were identified.

Additional procedural implementation was verified during RH waste emplacement conducted on March 13, 2013. The audit team witnessed the downloading of the facility cask to the underground, where it was driven off the waste hoist and staged to allow the 41-ton forklift to remove the facility cask from the facility cask transfer car. Spotters and Radcon support personnel assisted the forklift operator during removal of the facility cask, transporting it to Panel 6, room 2, and staging the cask on the HERE. The audit team then observed the emplacement of canister ID0317 from shipment INR13002 into borehole #84. Proper personal protective equipment (PPE) was observed in use during opening and closing of breakers required for equipment operation. The completion and documentation of WP 05-WH1724 Attachment 1, RH Waste Processing Data Sheet, was verified during the waste-handling evolution, as well as an update to the underground emplacement map. Additional verification of prior data sheets submitted to Records was performed. The review consisted of the last ten data sheets submitted. One data sheet dated 01/17/2013 identified the shipment

number instead of the canister number. The team reviewed additional documentation and determined this to be an isolated occurrence which was corrected and verified prior to the end of the audit. This concern is documented as CDA 3 (see section 6). The RH technician/operator/ performer, reviewer and validator signatures were verified, as well as individual qualifications.

The audit team identified no other concerns and determined that underground Remote-handled Waste-handling Operations and processes were adequately established for compliance with upper-tier requirements, satisfactory in the implementation of these requirements, and effective in achieving the desired results.

5.2.6 Waste Data System

The audit team evaluated the adequacy of Procedure WP 05-WH.02, Revision 1, *WIPP Waste Handling Operations WDS User's Manual*, with respect to the CBFO QAPD and DOE/WIPP-09-3427, Revision 10, *Waste Data System User's Manual*. The team determined that the procedure contains adequate flow-down of upper-tier requirements. Interviews were held with a waste-handling engineer (WHE) qualified for both RH and CH waste, and documents related to container receipt and emplacement were examined. The audit team verified that the WHE was knowledgeable of the process required to enter container receipt data into the Waste Data System (WDS). The audit team verified that emplacement locations and MgO locations were correctly entered into the WDS by the WHE. The audit team verified data by review of a WDS Waste Emplacement Report and determined that WDS data entry for receipt and emplacement data is performed adequately and in accordance with procedure.

Overall, the audit team concluded that the Waste Data System process was adequately established for compliance with upper-tier requirements, satisfactory in the implementation of these requirements, and effective in achieving the desired results. No concerns were identified.

5.2.7 Magnesium Oxide

The audit team evaluated the MgO procurement process at the WIPP as controlled by WP 05-1105, Revision 5, *Magnesium Oxide Sample Records Management*. The NWP MgO Subcontract Technical Representative (STR) was interviewed and records were reviewed. The audit team verified the MgO Sample Tracking Spreadsheet and determined it contained all procedurally required information. The audit team reviewed chain-of-custody forms, purchase orders, statements of work, analysis of shipment, cross reference tables, reactivity testing results, written approvals for disposing sample archives, certificates of analysis, and requests for analysis. The team determined that the documentation reviewed and results provided to the MgO STR are completed as required by procedure.

The audit team identified no concerns and determined that the MgO procurement process was adequately established for compliance with upper-tier requirements,

satisfactory in the implementation of these requirements, and effective in achieving the desired results.

5.2.8 Training and Qualification

The audit team reviewed training records for selected waste-handling personnel and determined these personnel are adequately trained for CH and RH waste-handling operations. The audit team determined that personnel performing surface and underground CH and RH waste-handling operations are adequately trained and qualified in accordance with DOE/WIPP 02-3183, *CH Packaging Program Guidance*, DOE/WIPP 02-3283, *RH Packaging Program Guidance*, and other procedures associated with this audit.

Overall, the audit team concluded that the Training and Qualification processes were adequately established for compliance with upper-tier requirements, satisfactory in the implementation of these requirements, and effective in achieving the desired results. No concerns were identified.

5.2.9 Measuring and Test Equipment

Personnel interviews were conducted and objective evidence was examined during auditing activities to verify compliance with the requirements for the control of M&TE. A review was performed on the M&TE used during CH and RH waste-handling activities. The equipment was determined to have been properly controlled, calibrated, and maintained.

Overall, the audit team concluded that Measuring and Test Equipment control activities were adequately established for compliance with upper-tier requirements, satisfactory in the implementation of these requirements, and effective in achieving the desired results. No concerns were identified.

5.2.10 Nonconformances

The audit team evaluated nonconformance reports (NCRs) associated with CH and RH waste-handling processes (FY2012-21, Rev. 0; FY2012-26, Rev. 0; FY2012-31, Rev. 0; FY2012-33, Rev. 0; FY2013-03, Rev. 0; FY2013-03, Rev. 0; FY2013-07, Rev. 0; FY2013-08, Rev. 0; FY2012-18, Rev. 0; and FY2012-20, Rev. 0). The team verified that the NCRs were processed as required by the NWP QAPD and WP 13 QA3004, Revision 12, *Nonconformance Report*.

Overall, the audit team concluded that process activities for Nonconformances were adequately established for compliance with upper-tier requirements, satisfactory in the implementation of these requirements, and effective in achieving the desired results. No concerns were identified.

5.2.11 Records

The audit team evaluated the records control process associated with CH and RH waste-handling processes. Objective evidence examined to verify compliance with the requirements for records included record submittals, retrieval requests, transmittal/receiving forms, Records Inventory and Disposition Schedules (RIDS), records inventory worksheets, and operational logbooks/notebooks. Records storage arrangements were evaluated to verify compliance with requirements for the preservation of in-process and completed records. Records were evaluated to verify accuracy, completion, legibility, and appropriate annotations for corrections when necessary.

Overall, the audit team concluded that the Records process was adequately established for compliance with upper-tier requirements, satisfactory in the implementation of these requirements, and effective in achieving the desired results. No concerns were identified.

5.2.12 Work Processes

Personnel interviews were conducted and various NWP Waste-handling Operations Program implementing procedures were examined to verify compliance with work process requirements. Work was performed under controlled conditions using approved instructions and procedures. Equipment used for the processing of the waste was calibrated and/or maintained.

Overall, the audit team concluded that Work Processes were adequately established for compliance with upper-tier requirements, satisfactory in the implementation of these requirements, and effective in achieving the desired results. No concerns were identified.

6.0 SUMMARY OF DEFICIENCIES

6.1 Corrective Action Reports (CARs)

During the audit, the audit team may identify CAQs and document such conditions on CARs.

Condition Adverse to Quality (CAQ) – Term used in reference to failures, malfunctions, deficiencies, defective items, and nonconformances.

Significant Condition Adverse to Quality – A condition which, if uncorrected, could have a serious effect on safety, operability, waste confinement, transuranic (TRU) waste site certification, compliance demonstration, or the effective implementation of the QA program.

The audit team identified one CAQ in CH packaging that resulted in a CAR.

CBFO CAR 13-014

Procedure WP 05-WH1015, step 6.5, requires the waste-handling technician to ensure air flow through ICV helium test ports. The technicians on both the A and B crews missed testing one port at the ICV helium test port locations. When asked about this, the technicians both admitted they did not perform the step.

6.2 Deficiencies Corrected During the Audit (CDAs)

Corrected During the Audit (CDA) – Isolated deficiencies that do not require a root cause determination or actions to preclude recurrence, and where correction of the deficiency can be verified prior to the end of the audit. Examples include one or two minor changes required to correct a procedure (isolated), one or two forms not signed or dated (isolated), and one or two individuals who have not completed a reading assignment.

During the audit, the audit team may identify CAQs. The audit team members and the Audit Team Leader (ATL) evaluate the CAQs to determine if they are significant. Once a determination is made that the CAQ is not significant, the audit team member, in conjunction with the ATL, determines if the CAQ is isolated requiring only remedial action and therefore can be Corrected During the Audit (CDA). Deficiencies that can be classified as CDA are those isolated deficiencies that do not require a root cause determination or actions to preclude recurrence, and those for which correction of the deficiency can be verified prior to the end of the audit.

Upon determination that the CAQ is isolated, the audit team member, in conjunction with the ATL, evaluates/verifies any objective evidence/actions submitted or taken by the audited organization and determines if the condition was corrected in an acceptable manner. Once it has been determined that the CAQ has been corrected, the ATL categorizes the condition as a CDA.

Three isolated deficiencies, described below, were identified and corrected during the audit.

CDA 1

During review of surface TRUPACT-II packaging activities and documentation, it was noted that the maintenance log was missing two maintenance records (Job #13-001 and Job #13-002) that are required by DOE/WIPP 02-3183, section 5.7. The team reviewed additional logs and determined this to be an isolated occurrence. The missing copies were obtained and the log was corrected and verified prior to the end of the audit.

CDA 2

During review of surface TRUPACT-II packaging activities and documentation, it was noted that the maintenance record for Job #13-009 contained an incorrect date

recorded by the waste-handling technician. The team reviewed additional maintenance records and determined the issue to be an isolated occurrence. The record was corrected and verified prior to the end of the audit.

CDA 3

During a review of underground RH emplacement activities (sample size of 10), one attachment 1, WP 05-WH1725, dated 01/17/2013, had the shipment number listed instead of the required canister number in one location. Another location requiring the canister number was correctly entered. The team reviewed additional documentation and determined this to be an isolated occurrence. The identified attachment 1 was corrected and verified prior to the end of the audit.

7.0 SUMMARY OF OBSERVATIONS AND RECOMMENDATIONS

During the audit, the audit team may identify conditions that warrant input by the audit team to the audited organization regarding potential problems or suggestions for program improvement. The audit team members, in conjunction with the ATL, evaluate these conditions and classify them as observations or recommendations (using the following definitions). Once a determination is made, the audit team members, in conjunction with the ATL, categorize the conditions appropriately.

Observation – A condition that is determined not to be a violation of procedure or requirement at the time but, if not controlled or addressed, may result in a CAQ during future activities.

Recommendation – A suggestion that is directed toward identifying opportunities for improvement and enhancing methods of implementing requirements.

7.1 Observations

No Observations were identified during the course of this audit.

7.2 Recommendations

No Recommendations were provided to NWP Management during the course of this audit.

8.0 LIST OF ATTACHMENTS

Attachment 1: Personnel Contacted During the Audit

Attachment 2: NWP Implementing Procedures Evaluated

Attachment 3: Summary Table of Audit Results

PERSONNEL CONTACTED DURING THE AUDIT				
NAME	ORGANIZATION/ DEPARTMENT	PRE-AUDIT MEETING	CONTACTED DURING AUDIT	POST-AUDIT MEETING
Allen, B.	NWP/Waste Handling	X		X
Ballew, A.	NWP/WHO		X	
Batchelder, T.	NWP/ Waste OPs	X	X	X
Bennett, K.	NWP/WHO		X	
Bradford, B.	NWP/ WHO		X	
Brennan, R.	NWP/ OPs		X	
Britain, R.	NWP/ Waste OPs Manager	X	X	X
Bryan, W.	NWP/ Ops	X		
Cannon, V.	NWP/ QA		X	
Chism, G.	NWP/ RH OPs		X	
Darrah, K.	NWP/ Transportation		X	
Gay, C.	NWP/ WHO		X	
Hernandez, L.	NWP/ QA	X		X
Hoff, J.	NWP/ QA Manager	X		X
Jasso, P.	NWP/WHO		X	
Johnson, A.	NWP/ Transportation Manager	X		
Jones, S.	NWP/ RES/SEC Manager	X		
Keathley, M.	NWP/ QA			X
Lord, T.	NWP/ WHO		X	
Marquez, E.	NWP/ WHO		X	
Meeker, C.	NWP/Waste Operations	X	X	X
Mullins, M.	NWP/ QA	X	X	X
Nance, C.	NWP/ Training		X	
Proctor, T.	NWP/ QA			X
Rascon, S.	NWP/ WHO		X	
Ripley, D.	NWP/ WHO RH		X	X
Sanders, C.	NWP/ QA		X	
Tanner, K.	NWP/ WHO		X	
Tavarez, R.	NWP/ WHO		X	

NWP Implementing Procedures Evaluated			
Number	Doc. Number	Rev.	Applicable NWP Document
1.	05-WH.02	1	WIPP Waste Handling Operations WDS User's Manual
2.	05-WH1002	13	TRUDOCK Operation 41-T-152 41-T-153
3.	05-WH1004	5	Facility and TRUPACT-II Pallet Handling
4.	05-WH1005	17	CH Packaging Trailer Loading
5.	05-WH1010	8	Container Overpacking
6.	05-WH1011	47	CH Waste Processing
7.	05-WH1015	29	Preparation of CH Packaging for Empty Shipment
8.	05-WH1025	9	Ch Waste Downloading and Emplacement
9.	05-WH1036	10	Site-Derived Mixed Waste Handling
10.	05-WH1058	11	CH Waste Handling Abnormal Operations
11.	05-WH1083	7	CH Packaging Operations
12.	05-WH1101	19	CH Surface Transuranic Mixed Waste Handling Area Inspections
13.	05-WH1105	5	Magnesium Oxide Sample Records Management
14.	05-WH1201	3	TRUPACT-III Handler
15.	05-WH1202	1	TP-III Monorail Hoist
16.	05-WH1203	2	TRUPACT-III Bolting Robot and Station
17.	05-WH1204	2	Facility Transfer Vehicle (FTV)
18.	05-WH1205	2	Yard Transfer Vehicle (YTV)
19.	05-WH1207	3	Yard Transfer Vehicle (YTV)
20.	05-WH1208	1	SLB2 Handler
21.	05-WH1210	5	TRUPACT III Processing and Empty Shipment
22.	05-WH1212	1	Payload Transfer Station (PTS)
23.	05-WH1213	1	TRUPACT-III Packaging Operations
24.	05-WH1214	3	TP-III Trailer Loading
25.	05-WH1217	1	TRUPACT-III WAVE (Work Assist Vehicle)
26.	05-WH1303	7	25-Ton Bridge Crane 41-T-130 TMF
27.	05-WH1401	5	Waste Handling Operator Event Response
28.	05-WH1402	11	13-Ton Electric Forklifts
29.	05-WH1403	5	3-Ton Electric Forklift 41-H-009
30.	05-WH1406	12	Conveyance Loading Car
31.	05-WH1407	10	6-Ton Bridge Cranes 41-T-151 (A, B, C, D)
32.	05-WH1410	10	Adjustable Center of Gravity Lift Fixture
33.	05-WH1412	10	CH Waste Handling Toyota Forklifts
34.	05-WH1601	10	20-Ton Diesel Forklift 52-H-125

NWP Implementing Procedures Evaluated			
Number	Doc. Number	Rev.	Applicable NWP Document
35.	05-WH1602	9	41-Ton Diesel Forklift 52-H-005A
36.	05-WH1603	10	CH TRU Underground Transporter, 52-H-008 A, B, & C
37.	05-WH1700	11	Horizontal Emplacement and Retrieval Equipment Assembly
38.	05-WH1703	10	RH TRU Emplacement Machinery Disassembly
39.	05-WH1704	8	Facility Cask Transfer Car (41-H-003) Operation
40.	05-WH1706	13	Preparation of an Empty RH-TRU 72-B Cask for Shipment
41.	05-WH1707	11	RH-TRU 72-B Trailer Loading
42.	05-WH1709	15	RH-TRU 72-B Trailer Unloading
43.	05-WH1710	23	72-B RH Processing
44.	05-WH1712	3	RH-TRU 72-B Cask Operation
45.	05-WH1713	11	Facility Cask and Facility Cask Rotating Device
46.	05-WH1714	4	RH Cask Preparation Station 41-Z-076
47.	05-WH1717	8	Cask Unloading Room Shield Door Operation
48.	05-WH1719	7	25-Ton Cask Unloading Room Crane
49.	05-WH1723	9	Underground RH Transuranic Mixed Waste Disposal Area Inspections
50.	05-WH1725	10	RH Downloading and Emplacement
51.	05-WH1727	14	RH-TRU 72-B Cask Uprighting Trailer Loading
52.	05-WH1729	14	RH-TRU 72-B Cask Uprighting Trailer Unloading
53.	05-WH1741	10	140/25-Ton Remote Handling Crane 41-T-001
54.	05-WH1742	6	Hot Cell Bridge Crane 41-T-104
55.	05-WH1744	12	Surface RH Transuranic Mixed Waste Handling Area Inspections
56.	05-WH1746	8	2.5-TON JIB Crane 41-T-201
57.	05-WH1757	6	RH Closed-Circuit TV System
58.	05-WH1758	14	RH Waste Handling Abnormal Operations
59.	05-WH1810	14	Underground TRU Mixed Waste Disposal Area Inspections
60.	05-WH4401	3	Waste Handling Operator Event Response
61.	08-NT3020	22	TRU Waste Receipt
62.	08-PT.03	8	WIPP QA Program Plan for Type "B" Packaging
63.	10-AD3028	9	Calibration and Control of Measurement and Test Equipment
64.	13-1	32	Washington TRU Solutions, LLC, Quality Assurance Program Description
65.	13-QA3004	12	Nonconformance Report
66.	14-TR.01	13	WIPP Training Program
67.	15-RM	6	WIPP Records Management Program

Summary Table of Audit Results

Audit Elements	Concern Classification				QA Evaluation		
	CARs	CDAs	Obs	Rec	Adequacy	Implementation	Effectiveness
QA Program					A	S	E
Training/Records					A	S	E
Waste Data System/ MgO					A	S	E
Records/NCFIs/ M&TE					A	S	E
CH & RH Surface Inspections					A	S	E
CH Surface Waste Processing	1	2			A	S	E
CH Underground Waste Processing					A	S	E
RH Surface Waste Processing					A	S	E
RH Underground Waste Processing		1			A	S	E
TOTALS	1	3			A	S	E

Definitions

A = Adequate
 I = Indeterminate
 NA = Not Adequate
 S = Satisfactory

E = Effective
 M = Marginal
 NE = Not Effective

CAR = Corrective Action Report
 CDA = Corrected During Audit
 Obs = Observation
 Rec = Recommendation