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Hazardous Waste Bureau

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

Subject: Transmittal of Surveillance Report S-14-22, LANL/CCP Shipment of TRU Waste to WCS

Dear Mr. Hoff:

The Carlsbad Field Office conducted Surveillance S-14-22 on April 2-3, 2014, to evaluate Los Alamos National Laboratory Central Characterization Program (LANL/CCP) activities conducted for shipment of transuranic (TRU) waste from LANL to Waste Control Specialists (WCS). The surveillance team concluded that the LANL/CCP activities observed were adequate, effective, and satisfactorily implemented for compliance with applicable upper-tier requirements.

If you have any questions concerning the enclosed report, please contact me at (575) 234-7491.

Sincerely,

Dennis S. Miehl
Senior Quality Assurance Specialist

Enclosure

cc: w/enclosure

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CBFO SURVEILLANCE REPORT

Surveillance Number: S-14-22 **Date of Surveillance:** April 2 – 3, 2014

Surveillance Title: Los Alamos National Laboratory Central Characterization Program (LANL/CCP) TRU Waste Shipment to Waste Control Specialists (WCS)

Organization: CCP

Surveillance Team:

B.J. Verret	Team Leader, CBFO Technical Assistance Contractor (CTAC)
Porf Martinez	Team Member, CTAC

Surveillance Scope:

Carlsbad Field Office Surveillance S-14-22 evaluated the adequacy, implementation, and effectiveness of the LANL/CCP transportation activities performed for contact-handled transuranic (CH-TRU) waste payload building, TRUPACT-II loading and maintenance, and shipment of TRUPACT-II containers from LANL to WCS. The evaluation was based on the following documents:

- DOE-WIPP 02-3183, *CH Packaging Program Guidance*
- DOE-WIPP 02-3184, *CH Packaging Operations Manual*
- DOE-CBFO 94-1012, *Quality Assurance Program Document*
- WP 08-PT.01, *Standard Waste Box Handling and Operations Manual*
- CCP-TP-033, *CCP Shipping of TRU Waste*
- CCP-TP-055, *CCP Varian Porta-Test Leak Detector Operations*

Activities Evaluated:

The following activities were evaluated in accordance with CCP implementing procedures:

- Payload building using standard waste boxes
- TRUPACT-II receipt, inspection, maintenance, loading, and helium leak testing
- Verification of training
- Shipment package preparation

The surveillance team reviewed and evaluated shipment packages for LANL shipment number LW14001 for TRUPACT-II containers 198, 171, and 166, on EPA Manifest 010784276JJK. The results of the review indicated that shipment

package documentation was assembled and completed in accordance with applicable implementing documents and procedures.

The surveillance team interviewed personnel, reviewed applicable implementing procedures, and observed receipt and processing of empty TRUPACT-II containers 187, 144, and 128, including inspection and maintenance activities.

The surveillance team observed the implementation of Work Instruction CH.02, Rev. 5, for the replacement of an inner containment vessel O-ring on TRUPACT-II container 157, documented on maintenance record 14-006 as new seal number 282.

The surveillance team observed the assembly of the following payloads: SWBs LA00000068284 and LASB02193 for TRUPACT-II container 157; SWBs LASB02190 and LA00000068763 for TRUPACT-II container 173; and SWBs LASB02191 and LA00000068003 for TRUPACT-II container 129.

The surveillance team observed the loading of TRUPACT-II containers 157, 173, and 129, including helium leak testing. The team verified that Helium leak testing is now performed only on the Inner Containment Vessel (ICV) and not on the Outer Confinement Vessel (OCV) per the latest revision of DOE-WIPP 02-3184, *CH Packaging Operations Manual* and the change in Section 4.1 of the latest revision of the TRUPACT-II Safety Analysis Report.

The team verified valid calibration stickers on all calibrated equipment used, and reviewed training documentation to ensure mobile loading unit personnel were current in completion of training requirements.

The surveillance team also evaluated the mobile loading unit spare parts and verified spare parts were labeled appropriately and were controlled and stored in accordance with applicable procedures.

The surveillance team also reviewed the 2014 CH/RH Packaging Maintenance Log and verified entries were documented in accordance with applicable implementing procedures, and maintenance records were complete and accurate.

No concerns were identified during the surveillance.

Surveillance Results:

The surveillance team determined that the LANL/CCP processes evaluated for transporting TRU waste were adequate, satisfactorily implemented, and effective.

Corrective Actions:

No corrective actions were identified during the surveillance.

Surveillance Team Leader Signature: B. J. O'D Date: 4/21/14

CBFO QA Director Approval Signature: D. J. Miers Date: 4-21-14