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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-14-26 Pertaining to Shipment Receipt, Unloading,
and Storage Activities at WCS

Dear Mr. Hoff:

On April 8, 2014, the Carlsbad Field Office conducted Surveillance S-14-26 of Waste Control Specialists (WCS) Central Characterization Program (CCP) activities conducted to receive, unload, and store transuranic waste at the WCS facility in Andrews County, Texas. Details of the surveillance are provided in the enclosed report. The surveillance team concluded that the activities evaluated are adequate, satisfactorily implemented, and effective. No concerns were identified during the surveillance.

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

Sincerely,

Dennis S. Miehs
Senior Quality Assurance Specialist

Enclosure

cc: w/enclosure

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CBFO SURVEILLANCE REPORT

Surveillance Number: S-14-26 **Date of Surveillance:** April 8, 2014

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

Organization: Nuclear Waste Partnership LLC (NWP)/CCP

Surveillance Team:

Dennis Miehls	Carlsbad Field Office (CBFO) Quality Assurance (QA) Representative
B.J. Verret	Team Leader, CBFO Technical Assistance Contractor (CTAC)
Porf Martinez	Team Member, CTAC
Wayne Ledford	Team Member, NWP

Surveillance Scope:

The surveillance evaluated the adequacy, implementation, and effectiveness of the WCS/CCP activities that direct contact-handled (CH) transuranic (TRU) waste receipt, transuranic package transporter model II (TRUPACT-II) unloading and maintenance, storage of waste containers at WCS, and shipment of empty TRUPACT-IIs from 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-PO-042, *CCP/WCS Interface Document*
- CCP-TP-027, *CCP Notifications for Intersite Shipment of Characterized CH TRU Waste*
- CCP-TP-405, *CCP Intersite Shipments of CH TRU Waste*
- WCS OP-1.1.21, *Material Control and Accountability System (Electronic Waste Tracking System)*

Activities Evaluated:

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

- Receipt of TRU waste from LANL at WCS

- Waste package unloading
- Waste storage
- TRUPACT-II receipt, inspection, maintenance, shipment of empty TRUPACT-IIs
- Verification of training

Container management, including the evaluation of the WCS electronic waste tracking system, was assessed in accordance with WCS implementing procedures.

TRUPACT-II Receipt Activities

Mobile loading unit (MLU) personnel are used to unload TRUPACT-IIs for storage at WCS. The surveillance team reviewed shipping documentation for the receipt of shipment LW14001 for TRUPACT-II containers 198, 171, and 166 from LANL on manifest 010784276JJK. The surveillance team interviewed personnel regarding process implementation for these activities and verified the most current revision of operating procedures were being used. The surveillance team observed the unloading and storage operations for TRUPACT-II payloads (standard waste boxes [SWBs]) and verified operations were in compliance with operating procedures. In addition, the surveillance team verified current calibration on equipment used during the receipt process.

MLU spare parts were examined and found to be controlled, stored, and labeled properly. Training of MLU personnel involved in waste processing operations were verified to be compliant with applicable training requirements.

WCS Container Management and Waste Tracking

The surveillance team interviewed WCS personnel, reviewed WCS implementing procedures, and examined *WCS Container Weekly Inventory CSB/BSA/90 Day*, dated 4/4/2014, and *WasteSoft Container inventory for LANL TRU waste in the CSB*, dated 4/8/2014. In addition, the surveillance team reviewed WCS operator training and qualification records for the WCS crane and forklift operators and verified operators were current with applicable WCS training requirements.

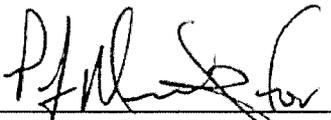
The surveillance team observed LANL TRU waste in storage at the Container Storage Building (CSB) at WCS. At the time of the surveillance there were 30 SWBs in storage; 12 additional SWBs were in the process of being unloaded and received that day. The surveillance team verified that the SWBs in storage were properly entered into the WCS inventory system (WasteSoft) in accordance with WCS procedures. Container location information in WasteSoft was verified against the actual physical location in the CSB for a sample of SWBs. The weekly container inventory of the CSB conducted on April 4, 2014 was reviewed. The container inventory properly accounted for the SWBs in storage at that time.

Surveillance Results:

No concerns were identified during the surveillance. The surveillance team determined that the processes for unloading and storage of TRU waste are adequate, satisfactorily implemented, and effective.

Corrective Actions:

No conditions adverse to quality were identified during the surveillance.

Surveillance Team Leader Signature:  Date: 4/23/2014
William (B.J.) Verret

CBFO QA Approval Signature:  Date: 4-23-14
Dennis S. Miehl