
Dear Mr. Cannon:

The Carlsbad Field Office conducted Audit A-15-07 on January 20-22, 2015 at the Skeen Whitlock Building in Carlsbad, New Mexico. The audit report is enclosed. No conditions adverse to quality were identified during the audit.

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

Sincerely,

Dennis S. Miehls
Senior Quality Assurance Specialist

Enclosure

cc: w/enclosure
M. Brown, CBFO
J.R. Stroble, CBFO
M. Navarrete, CBFO
F. Sharif, NWP/CCP
A.J. Fisher, NWP/CCP
M. Walker, NWP/CCP
J. Carter, NWP/CCP
B. Allen, NWP
S. Punchios, NWP
S. Escareno-Soto, NWP
W. Ledford, NWP
T. Peake, EPA
L. Bender, EPA
S. Ghose, EPA
R. Lee, EPA
S. Holmes, NMED
R. Maestas, NMED
C. Smith, NMED
V. Daub, CTAC
R. Allen, CTAC
B.J. Verret, CTAC
P. Martinez, CTAC
D. Harvill, CTAC
G. White, CTAC
WIPP Operating Record
CBFO M&RC
CBFO QA File

*ED denotes electronic distribution
U.S. DEPARTMENT OF ENERGY
CARLSBAD FIELD OFFICE

AUDIT REPORT

OF THE

CENTRAL CHARACTERIZATION PROJECT
ALL SITES TRANSPORTATION ACTIVITIES FOR CONTACT-HANDLED
AND REMOTE-HANDLED TRANSURANIC WASTE

CARLSBAD, NEW MEXICO

AUDIT NUMBER A-15-07

JANUARY 20 – 22, 2015

Prepared by: William J. Verket, CTAC
Audit Team Leader

Approved by: Michael R. Brown, CBFO
Director, Quality Assurance Division

Date: 2/12/15

Date: 2/17/2015
1.0 EXECUTIVE SUMMARY

Carlsbad Field Office (CBFO) Audit A-15-07 was conducted to evaluate the adequacy, implementation, and effectiveness of transportation activities performed under the Central Characterization Program (CCP). The audit was conducted in Carlsbad, NM, January 20 - 22, 2015.

The evaluation included transportation activities performed by CCP at Los Alamos National Laboratory (LANL), the Savannah River Site (SRS), and Idaho National Laboratory (INL).

The audit team concluded that overall, the CCP procedures reviewed were adequate relative to the flow-down of requirements from the TRUPACT-II Safety Analysis Report, the TRUPACT-II Certificate of Compliance, the Contact Handled Transuranic Waste Authorized Methods for Payload Control (CH-TRAMPAC), the RH-72B Safety Analysis Report, the RH-72B Certificate of Compliance, the Remote Handled Transuranic Waste Authorized Methods for Payload Control (RH-TRAMPAC), the TRUPACT-III Safety Analysis Report, the TRUPACT-III Certificate of Compliance, and the TRUPACT-III TRAMPAC.

The audit team also concluded that the requirements associated with CCP transportation activities were satisfactorily implemented and effective relative to the requirements of the CBFO Quality Assurance Program Document (QAPD).

No conditions adverse to quality (CAQs) were identified during this audit. No Observations were identified and no Recommendations were offered for management consideration.

2.0 SCOPE AND PURPOSE

2.1 Scope

The audit team evaluated the adequacy, implementation, and effectiveness of CCP plans and procedures related to waste transportation activities for shipment of transuranic (TRU) waste to the Waste Isolation Pilot Plant (WIPP). The team reviewed documentation and conducted personnel interviews to determine adequacy, implementation, and effectiveness of selected quality assurance (QA) and technical processes related to the shipment of TRU waste. The following activities were audited:

Quality Assurance Activities

- Approved Procedures, Including Documentation of Activities Required by Procedures
- Personnel Qualifications and Training
- Records
- Nonconformances and Corrective Actions, Including Nuclear Regulatory Commission Reportable Violations
- Assessments
Technical Activities

- Packaging Operations, Waste Certification, and Shipping Activities
- Leak Testing
- WIPP Waste Information System/Waste Data System (WWIS/WDS) Data Entry
- Gas Generation Testing
- Flammable Gas Analysis

The evaluation of CCP TRU waste transportation activities and documentation was based on current revisions of the following documents.

DOE/CBFO-94-1012, CBFO Quality Assurance Program Document (QAPD)
TRUPACT-III Authorized Methods for Payload Control (TRUPACT-III TRAMPAC)
Contact Handled Transuranic Waste Authorized Methods for Payload Control (CH-TRAMPAC)
TRUPACT-II Safety Analysis Report
TRUPACT-II Certificate of Compliance
RH-72B Safety Analysis Report
RH-72B Certificate of Compliance
Remote Handled Transuranic Waste Authorized Methods for Payload Control (RH-TRAMPAC)
DOE/WIPP 02-3183, CH Packaging Program Guidance
DOE/WIPP 02-3184, CH Packaging Operations Manual
DOE/WIPP 02-3185, CH Packaging Maintenance Manual
DOE/WIPP 02-3220, CH Packaging Operations for High Wattage Waste
WP 08-PT.01, Standard Waste Box Handling and Operations Manual
WP 08-PT.02, Ten-Drum Overpack Handling and Operations Manual
WP 08-PT.04, TRUPACT-II/HalfPACT Trailer Operation and Maintenance Manual
WP 08-PT.13, RH-TRU 72B Cask Uprighting Trailer Operation and Maintenance Manual
DOE/WIPP 02-3283, RH Packaging Program Guidance
DOE/WIPP 02-3284, RH Packaging Operations Manual
2.2 Purpose

Audit A-15-07 was conducted to evaluate the adequacy, implementation, and effectiveness of technical and QA processes related to the transportation activities governed by the CCP.

3.0 AUDIT TEAM

Dennis Miehls  Management Representative, CBFO Quality Assurance Division
William J. Verret  Audit Team Leader, CBFO Technical Assistance Contractor (CTAC)
Porf Martinez  Auditor, CTAC
Paul Gomez  Auditor, CTAC

4.0 AUDIT PARTICIPANTS

The individuals from CCP who were present at the pre-audit and post-audit meetings and who were contacted during the audit are identified in Attachment 1. A pre-audit meeting was held at the Skeen-Whitlock Building in Carlsbad, NM, on January 20, 2015. The audit was concluded with a post-audit meeting held at the Skeen-Whitlock Building in Carlsbad, NM, on January 22, 2015.
5.0 SUMMARY OF AUDIT RESULTS

5.1 Program Adequacy, Implementation, and Effectiveness

The audit team concluded that the applicable CCP transportation activities, as described in the associated CCP implementing procedures, were adequate, satisfactorily implemented, and effective for compliance with the requirements of the CH-TRAMPAC, RH-TRAMPAC, TRUPACT-III TRAMPAC, and CBFO upper-tier manuals and guidance documents. Audit activities, including objective evidence reviewed, are described in the following sections. Attachment 2 contains the Summary Table of Audit Results. Attachment 3 provides a list of CCP procedures that implement the appropriate TRAMPAC, QAPD, flammable-gas testing, and gas-generation testing requirements. TRUPACT-III activities were also verified to be adequate, satisfactorily implemented and effective.

The audit team concluded that the CCP QA Program as related to transportation (QAPD section 1.1) was adequate, satisfactorily implemented, and effective.

5.2 Quality Assurance Activities

5.2.1 Approved Procedures, Including Document Preparation, Approval, and Control

CCP personnel who perform work under the CCP Transportation Program are required to work to the latest CCP program procedures. These procedures are initiated and revised in accordance with CCP-QP-010, CCP Document Preparation, Approval, and Control. The audit team verified that new and revised procedures met the format and review requirements of CCP-QP-010. Document Services ensures that required reviews, including CBFO-required reviews, from program documents (e.g., CCP-PO-001, CCP Transuranic Waste Characterization Quality Assurance Project Plan) are designated in the Quality and Manufacturing Integrated System (Q&MIS), as required before issue. The team verified that obsolete documents are handled per procedure and are removed from the secure file transfer protocol (sftp) site. CCP Training and CCP Records are notified of any document cancellations.

The audit team concluded that the requirements governing Approved Procedures processes were adequately addressed, satisfactorily implemented, and effective.

5.2.2 Personnel Qualification and Training

The audit team verified the adequacy of CCP-QP-002, Rev. 38, CCP Training and Qualification Plan. The procedure was determined to meet the requirements of the QAPD.

The team assessed 15 qualification cards for both contact-handled (CH) and remote-handled (RH) waste transportation personnel who were appropriately assigned by the
Site Project Manager (SPM). The team reviewed and verified initial proficiency and maintenance of proficiency. No changes had occurred since the previous audit. The team verified that the CCP has performed mock transportation proficiency exercises since the WIPP site events of February 2014.

The training files include mobile loading unit personnel and the list of qualified individuals for both CCP and Advanced Mixed Waste Treatment Project (AMWTP) CCP-controlled personnel. The qualification cards examined were determined to contain the appropriate information for each individual.

The audit team verified qualification cards for eight personnel from the helium leak detection teams. Personnel qualifications were found to be appropriately fulfilled for this year, with no requalifications due for up to two years.

The team also evaluated the qualifications cards for four transportation pressure change leak-testing personnel. These personnel were found to be appropriately trained to the requirements of CCP-QP-032, CCP Written Practice for the Qualification of CCP Pressure Change Leak Testing Personnel. Each individual's qualification card was found to be properly filed in the training area file cabinets.

The Personnel Qualification and Training Program procedures and activities were found to be adequate, satisfactorily implemented, and effective.

5.2.3 Records

The audit team verified the copies of the batch data reports (BDRs) provided to the team for QA purposes. The BDRs were found to be complete, legible, and reproducible, with no highlighter markings present.

The team verified that permanent records are maintained at the WIPP Records Archives. Paper records are maintained in fire-rated cabinets in the Skeen-Whitlock Building (SWB). Changes and correction made to the records are sent to the archives.

Electronic records are also maintained at the WIPP Records Archives. Courtesy copies are provided through the Dixon database. Transportation records are provided at each site to specified personnel who are designated and managed by the SWB Records Manager.

The team verified both the CH and RH Records Inventory and Disposition Schedules (RIDS) for the management of QA records. The RIDS indicated proper disposition schedules.

The Records management program procedures and activities were determined to be adequate, satisfactorily implemented, and effective.
5.2.4 Nonconformances and Corrective Actions Including Nuclear Regulatory Commission Violations

The audit team verified that procedure CCP-QP-005, Rev. 24, CCP TRU Nonconforming Item Reporting and Control, adequately meets the requirements of the QAPD. The team verified that the following NCRs were maintained in the records system:

- NCR-LANL-0114-14, Rev. 2
- NCR-SRS-0380-14, Rev. 0
- NCR-INL-0838-14, Rev. 0
- NCR-ORNL-0151-14, Rev. 0
- NCR-INL-0024-14, Rev. 0

All NCRs reviewed by the team contained an NCR number and revision number, an initiation date, and the name of the originator. None of the NCRs reviewed were of the type that must be reported to the CBFO within 7 calendar days of identification of the deficiency.

All functions associated with the NCR coordinator, such as log activities, distribution, closure, and reconciliation reports, are appropriately sent to records.

There was one Nuclear Regulatory Commission (NRC) Violation since the previous audit of the CCP All Sites' Transportation Program. This violation was regarding shipping unacceptable waste with unreacted oxidizer to the Waste Isolation Pilot Plant and to Waste Control Specialists. There were no major occurrences during transportation of the waste and no component or system failures, but the conditions in CofC No. 9218 were not followed in their entirety. This Violation resulted in WIPP Form 14-169.

The Nonconformances and Corrective Actions reporting and control program procedures and NRC Violations reporting were determined by the audit team to be adequate, satisfactorily implemented, and effective.

5.2.5 Assessments and Quality Assurance Oversight

The audit team verified the adequacy of procedure CCP-QP-018, Rev. 11, Management Assessments, in meeting the requirements of the QAPD. Nuclear Waste Partnership LLC (NWP) QA works with CCP management to schedule transportation assessments while assigning assessment numbers. CCP management develops the assessment schedule and transmits it to QA management. Due to the February 2015 events at the WIPP site, no transportation audits are scheduled for calendar year 2015.

Objective evidence was provided for the 2015 and 2014 CCP Management Assessment Logs dated 1-5-2015 and 2-12-2014, respectively. The management assessment provided for objective evidence item MA-CCP-0012-13 supported Loading and Shipping Activities at one active generator site. No deficiencies were noted. The report had been appropriately signed by the assessment team leader.
Additional objective evidence was provided in the assessment plan, which showed that the report was submitted to records within 30 working days of the end of the assessment. All records were appropriately reported. The CCP Assessments and Quality Assurance Oversight program procedures were determined to be adequate, satisfactorily implemented, and effective.

5.2.6 Procurement

The audit team walked through the purchase requisition (PR) process with CCP personnel. CCP QA personnel develop the Receipt Inspection Verification Sheet (RIVS) from the PR and statement of work (SOW). Four PRs were reviewed to verify that they were generated, reviewed, and approved in accordance with CCP-QP-015, *CCP Procurement*. After the RIVS is approved by CCP QA, the QA Manager approves the PR. The audit team verified that the RIVS was properly completed, signed, dated, and submitted to CCP. The audit team verified completed purchase requisition files were stored in CCP Records, per the requirements of CCP-QP-008, *CCP Records Management*.

The audit team concluded that the requirements governing Procurement were adequately addressed, satisfactorily implemented, and effective.

5.2.7 Measuring and Test Equipment

The audit team verified that CCP maintains a master database of measuring and test equipment (M&TE) in accordance with CCP-QP-016, *CCP Control of Measuring, Testing, and Data Collection Equipment* (Integrated Data Center [IDC], M&TE Data module). The team determined that calibration and documentation of calibration of current and past M&TE utilized for transportation activities are acceptable. Instrument numbers were noted and then verified against the CCP M&TE listing and against their on-file calibration certificates.

The audit team concluded that the requirements governing the Measuring and Test Equipment processes were adequately addressed, satisfactorily implemented, and effective.

5.2.8 Data Analysis and Trending

The audit team verified that each site provided a site-specific trend report to CCP. Those reports are compiled to develop the CCP semi-annual trend reports, which are provided to CBFO to identify adverse trends and potential adverse trends. Past semi-annual site-specific reports from SRS, LANL, and INL were reviewed and found to be satisfactory in meeting the requirements of CCP-QP-014, *CCP Data Analysis and Trending*. The audit team verified these documents were in CCP Records and included in the appropriate RIDS.

The audit team concluded that the requirements governing Data Analysis and Trending were adequately addressed, satisfactorily implemented, and effective.
5.2.9 Inspection Control

Transportation-related inspection activities are performed either at the host site or by NWP inspectors at the WIPP site. CCP does not directly perform inspections. CCP QA follows the purchase order, receives the completed RIVS, reviews the RIVS for accuracy and completion, and submits it to CCP Records. When appropriate, the need to check for suspect counterfeit items is documented in the purchase order and transferred to the RIVS. A Material Safety Data Sheet (MSDS) is requested for each chemical, including calibration gases.

The audit team concluded that the requirements governing Inspection Control were adequately addressed, satisfactorily implemented, and effective.

5.2.10 Conduct of Operations

Conduct of operations activities for transportation activities covered under Procedure CCP-PO-005, *CCP Conduct of Operations*, were evaluated by document review and personnel interviews. The audit team verified that the Project Office Standing Orders and site-specific Standing Orders were available as electronic files on the sftp site. Paper copies of the Project Office Standing Orders were also available in hard copy at the SWB. The quarterly review of Project Office Standing Orders was determined to have been completed satisfactorily. Attachments 5 and 6 to CCP-PO-005 were determined to be properly followed in the preparation of both project- and site-specific Standing Orders.

Required reading for CCP transportation personnel was maintained in the IDC. In addition, the audit team verified that required reading documents were circulated via IDC and email for specified individuals, and acknowledgments were provided through IDC or email to the Training Coordinator.

The audit team concluded that the requirements evaluated for Conduct of Operations were adequately addressed, satisfactorily implemented, and effective.

5.3 Technical Activities

Each technical area audited is discussed in the following sections. The method used to select objective evidence is described, the objective evidence used to assess compliance with the TRAMPAC and packaging documents is cited briefly, and the result of the assessment is provided.

Objective evidence to evaluate the implementation of associated transportation activities was selected and reviewed. Shipping BDRs, transportation records, and training documentation for CCP personnel were evaluated to ensure compliance with the CH and RH TRAMPAC documents. Flammable gas analyses and BDRs were examined to ensure compliance with DOE/WIPP 06-3345, *Waste Isolation Pilot Plant Flammable Gas Analysis*. TRUPACT-III operations at SRS were evaluated and found to be acceptable, satisfactorily implemented, and effective.
The audit team requested CCP shipping BDRs that were representative of the various types of shipping performed by each site. BDRs were provided to the audit team by CCP Records. The following BDRs were selected at random, examined, and determined to be acceptable:

- CH shipping:
  - Savannah River Site: SR134014 (TRUPACT-III); SR130024; SR140005
  - Idaho National Laboratory: IN140045 (AMWTP)
  - Los Alamos National Laboratory: LA140021; LA130169

- RH shipping:
  - Idaho National Laboratory: INR14002; INR13052
  - Argonne National Laboratory-East: AER13037

5.3.1 Packaging Operations, Waste Certification, and Shipping Activities

Objective evidence was reviewed to evaluate the adequacy of transportation-related activities. The BDRs listed in section 5.3 were evaluated based on procedure requirements for packaging, certification, and shipment.

The audit team concluded that the transportation activities for Packaging Operations, Waste Certification, and Shipping Activities were adequate, satisfactorily implemented, and effective.

5.3.2 Leak Testing

The audit team examined and evaluated the CH and RH shipping BDRs listed in section 5.3 for helium leak testing and rate of rise leak testing to verify that leak testing activities were performed as required and that the results were acceptable. Training of leak test personnel was evaluated by review of training files and qualification cards.

The audit team concluded that the Leak Testing activities evaluated were adequate, satisfactorily implemented, and effective.

5.3.3 WIPP Waste Information System/Waste Data System (WWIS/WDS) Data Entry

Interviews were conducted with the CCP Waste Certification Official (WCO) and the CCP Waste Certification Assistant (WCA). The WCO and WCA performed demonstrations of WDS data entry and retrieval of WDS data that verified data entry was acceptably performed. Training and qualifications of the WCO and WCA were verified as compliant.

The audit team concluded that WWIS/WDS Data Entry activities were adequate, satisfactorily implemented, and effective.

5.3.4 Gas Generation Testing
LANL was the only CCP site performing gas generation studies in the past 12 months. BDR LA141205 was evaluated for compliance and completeness, and was determined to be acceptable. Training was verified for gas generation operators and independent technical reviewers (ITRs). Long-term data reporting for the current gas generation operations was verified to be compliant using the Unified Flammable Gas Test Plan Report, INL for Drums Remediated for Liquid, from April 2013. The audit team verified that all requirements were met.

The audit team concluded that Gas Generation Testing activities were adequate, satisfactorily implemented, and effective.

5.3.5 Flammable Gas Analysis

Flammable gas analysis was audited by examination of the following flammable gas BDRs, which were produced at INL, LANL, and SRS:

<table>
<thead>
<tr>
<th>BDR Code 1</th>
<th>BDR Code 2</th>
<th>BDR Code 3</th>
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<tr>
<td>IN14FG10144</td>
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<td>LA13FG2123</td>
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<td>SR12FG11124</td>
<td>SR12FG11097_ICAL</td>
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<td>SR12FG11072_MDL</td>
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</tr>
</tbody>
</table>

Training of operators and ITRs was verified through examination of training records. Initial calibration (ICAL) and minimum detection limit (MDL) activities were verified through examination of the flammable gas BDRs listed.

The audit team concluded that the Flammable Gas Analysis activities were adequate, satisfactorily implemented, and effective.

6.0 CORRECTIVE ACTIONS, OBSERVATIONS, AND RECOMMENDATIONS

6.1 Corrective Action Reports

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

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

No CAQs were identified as a result of Audit A-15-07.

6.2 Deficiencies Corrected During the Audit

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.

CDA – Isolated deficiency that does not require a root cause determination or actions to preclude recurrence. 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 not dated (isolated), and one or two individuals that have not completed a reading assignment.

No CDAs were presented to CCP management as a result of Audit A-15-07.

6.3 Observations

Observation – A condition that, if not controlled, could result in a CAQ.

No Observations were presented to CCP management as a result of Audit A-15-07.

6.4 Recommendations

Recommendations – Suggestions that are directed toward identifying opportunities for improvement and enhancing methods of implementing requirements.

No Recommendations were presented to CCP management as a result of Audit A-15-07.

7.0 LIST OF ATTACHMENTS

Attachment 1: Personnel Contacted During the Audit
Attachment 2: Summary Table of Audit Results
Attachment 3: Listing of Audited CCP Procedures
## PERSONNEL CONTACTED DURING THE AUDIT

<table>
<thead>
<tr>
<th>NAME</th>
<th>TITLE/ORG</th>
<th>PREAUDIT MEETING</th>
<th>CONTACTED DURING AUDIT</th>
<th>POST AUDIT MEETING</th>
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<tbody>
<tr>
<td>Armijo, Cheryl</td>
<td>NTP Training, Records Analyst</td>
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<tr>
<td>Billett, Michele</td>
<td>CCP/NTPC Training Coordinator</td>
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<td>Dickerson, Christy</td>
<td>CCP Project Controls (Procurement)</td>
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<td>Fisher, A.J.</td>
<td>NWP/NTPC/CCP Senior Technical Advisor</td>
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<td>Kirkes, Creta</td>
<td>CCP WCO</td>
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<td>Ledford, Wayne</td>
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<td>McAvoy, Jesse</td>
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<td>Pearcy, Sheila</td>
<td>CCP/NTPC Records Mgr</td>
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<td>Ramirez, Michael</td>
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<td>Robert Semon</td>
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<td>Sensibaugh, Michael</td>
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<td>Walker, Mak</td>
<td>QA/NCR Coordinator</td>
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### SUMMARY TABLE OF AUDIT RESULTS

<table>
<thead>
<tr>
<th>Evaluated Areas</th>
<th>Classification of Concern(s) by Concern Number</th>
<th>Program Status</th>
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<tbody>
<tr>
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<td>CARs</td>
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<td>Packaging, Certification, Shipping</td>
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<td>Records</td>
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<td>Nonconformances, Corrective Actions, Corrective Action Management</td>
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<td>Procurement</td>
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<td>Inspection Control, M&amp;TE</td>
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<td>Data Analysis and Trending</td>
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<td>Conduct of Operations</td>
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<td>Leak Testing, Flammable Gas, Gas Generation</td>
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<td>WDS</td>
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<td><strong>TOTALS</strong></td>
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A = Adequate  
E = Effective  
S = Satisfactory
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<td>1. CCP-PO-003, Rev. 13</td>
<td>CCP Contact-Handled Transuranic Authorized Methods for Payload Control (CCP CH-TRAMPAC)</td>
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<td>2. CCP-PO-005, Rev. 22</td>
<td>CCP Conduct of Operations</td>
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<td>3. CCP-PO-505, Rev. 1</td>
<td>CCP Remote-Handled Transuranic Authorized Methods for Payload Control (CCP RH-TRAMPAC)</td>
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<td>4. CCP-QP-002, Rev. 38</td>
<td>CCP Training and Qualification Plan</td>
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<td>5. CCP-QP-005, Rev. 24</td>
<td>CCP TRU Nonconforming Item Reporting and Control</td>
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<td>6. CCP-QP-008, Rev. 23</td>
<td>CCP Records Management</td>
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<td>10. CCP-QP-016, Rev. 20</td>
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<td>12. CCP-QP-021, Rev. 10</td>
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<td>15. CCP-QP-030, Rev. 9</td>
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<td>23. CCP-TP-530, Rev. 11</td>
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