



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



MAR 12 2015

Mr. V.K. Cannon, Manager
 Quality Assurance
 Nuclear Waste Partnership LLC
 P.O. Box 2078
 Carlsbad, NM 88221-2078

Subject: Surveillance Report S-15-36, Change-Out of 41-B-856/857 Moderate Efficiency Filters

Dear Mr. Cannon:

The Carlsbad Field Office conducted the subject surveillance March 3-4, 2015, at the Waste isolation Pilot Plant. Results of the surveillance are provided in the enclosed report. No deficiencies were noted.

If you have questions or comments concerning Surveillance S-15-36, please contact me at (575) 234-7491.

Sincerely,

Dennis S. Miehls
 Senior Quality Assurance Specialist

Enclosure

cc: w/enclosure

M. Brown, CBFO	* ED	R. Lee, EPA	ED
W. Mouser, CBFO	ED	R. Maestas, NMED	ED
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M. Percy, NWP	ED	R. Allen, CTAC	ED
W. Ledford, NWP	ED	K. Kirkes, CTAC	ED
B. Allen, NWP	ED	P. Martinez, CTAC	ED
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S. Escareno-Soto, NWP	ED	G. White, CTAC	ED
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L. Bender, EPA	ED	CBFO M&RC	
S. Ghose, EPA	ED	*ED denotes electronic distribution	

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CBFO SURVEILLANCE REPORT

Surveillance Number: S-15-36

Date of Surveillance: March 3-4, 2015

Surveillance Title: Change-Out of 41-B-856 / 857 Moderate Efficiency Filters

Organization: Nuclear Waste Partnership LLC (NWP)

Surveillance Team:

Kirk Kirkes Surveillance Team Lead, Carlsbad Field Office (CBFO) Technical Assistance Contractor (CTAC)

Surveillance Scope:

The surveillance evaluated the performance of work associated with replacing the Moderate Efficiency Filters in the 41-B-856 /857 Filter Banks.

Governing Documents/Requirements:

- Work Order 1401532, Change Out of 41-B-856 / 857 Moderate Efficiency Filters
- ESS-2014-05, Change-Out of U/G Ventilation System Filters
- Radiation Work Permit #15-204
- Pre-job Briefing form #EA04AD3030-1-0

Activities Evaluated:

The surveillance team evaluated the removal and replacement of the Moderate Efficiency Filters in Bank 856 and Bank 857 located in Building 413 at the Waste Isolation Pilot Plant. An initial review of the approved work package included Mod Filter survey sheets, tagout/lockout requests, lessons learned, thermal stress evaluations, diagram of Building 413, the work status log, Senior Management Review Board screening, job hazard analysis checklist, and an environmental compliance review. Prior to the work being performed, a pre-job briefing was conducted that included a review of the work package, task assignments for each individual, as well as the Radiation Work Permit requirements.

Day 1 of the filter change work started with verification of ventilation alignment to isolate Filter Bank 856. Facility Operations and the maintenance craft performed tagout/lockout to ensure isolation while work was performed. Initial entry into the filter room was to verify negative pressure and perform pre-job radiation and contamination surveys to confirm room conditions. Once the room was cleared by Radiological Control (Radcon), the filter removal began. Each Mod filter was pulled from the housing by maintenance personnel and placed into an empty box that was sealed with tape. The box was then bagged and taped and checked by Radcon to ensure no contamination was present prior to passing it into the second contamination area transition point. The

second contamination area activity included a second team of maintenance personnel placing the bagged filter into a second bag and sealing it with tape. Radcon then performed contamination surveys of the outer bag and took dose readings. The dose rate and filter housing location information was marked on the outer bag. Once verified clean, the filter was transferred out of the second contamination area and placed into a large tote bag, weighed on a scale, and surveyed for contamination. Waste handling operators placed the used filters in a connex staged outside Building 413 for future disposition. Once all 21 Mod filters were removed, the new filters were transferred into the filter room and installed into the Mod filter housing. Four filters removed from Bank 856 were identified as samples and segregated in the connex container. These filters will be sent to a laboratory for further testing.

Rigorous contamination control techniques/activities by Radcon were observed during the filter change-out activities, such as continual smears and swipes of transition points and high foot traffic areas.

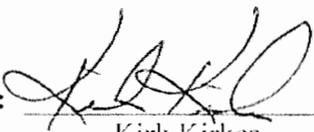
Day 2 of the Mod filter change-out was observed for Bank 857. Ventilation re-alignment was performed to isolate Bank 857. The activities described above were repeated, including identification of two filters from Bank 857 as samples to be tested.

Surveillance Results:

Overall, the surveillance team determined that the activities associated with the replacement of the Moderate Efficiency Filters in Banks 856/857 were satisfactorily conducted and implemented in accordance with the work requirements.

Deficiencies:

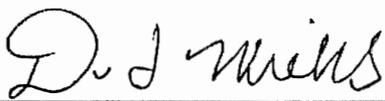
NONE

Surveillance Team Leader: 
Kirk Kirkes

Date: 3/5/15

Assistant Manager/Office Director: N/A

Date: N/A

CBFO QA Director Approval: 

Date: 3-10-15