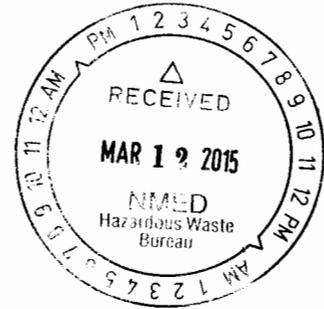




**Department of Energy**  
 Carlsbad Field Office  
 P. O. Box 3090  
 Carlsbad, New Mexico 88221



MAR 12 2015



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

Subject: Transmittal of the Report for CBFO Audit A-15-05

Dear Mr. Cannon:

The Carlsbad Field Office (CBFO) performed Audit A-15-05, of the Nuclear Waste Partnership LLC Regulatory and Environmental Services Waste Confirmation Process, from January 27 through January 29, 2015. The audit team concluded that overall, the programs evaluated are adequate, satisfactorily implemented, and effective. Details of the audit and conclusions of the audit team are provided in the enclosed report.

If you have any questions or comments concerning the audit report, please contact me at (575) 234-7483.

Sincerely,

Martin P. Navarrete  
 Senior Quality Assurance Specialist

Enclosure

cc: w/enclosure

D. Gadbury, CBFO	*ED	S. Ghose, EPA	ED
M. Brown, CBFO	ED	R. Lee, EPA	ED
G. Basabilvazo, CBFO	ED	S. Holmes, NMED	ED
D. Miehl, CBFO	ED	R. Maestas, NMED	ED
R. McQuinn, NWP	ED	C. Smith, NMED	ED
J. Blankenhorn, NWP	ED	V. Daub, CTAC	ED
J. Harris, NWP	ED	R. Allen, CTAC	ED
B. Allen, NWP	ED	P. Martinez, CTAC	ED
W. Ledford, NWP	ED	B. Pace, CTAC	ED
S. Punchios, NWP	ED	P. Y. Martinez, CTAC	ED
S. Escareno-Soto, NWP	ED	D. Harvill, CTAC	ED
R. Chavez, RES	ED	G. White, CTAC	ED
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\*ED denotes electronic distribution



U.S. DEPARTMENT OF ENERGY  
CARLSBAD FIELD OFFICE

AUDIT REPORT

OF THE

NUCLEAR WASTE PARTNERSHIP LLC/REGULATORY AND  
ENVIRONMENTAL SERVICES WASTE CONFIRMATION PROCESS

CARLSBAD, NEW MEXICO

AUDIT NUMBER A-15-05

January 27 – 29, 2015



Prepared by:

*Priscilla Y. Martinez*

Priscilla Y. Martinez, CTAC  
Audit Team Leader

Date:

3-3-2015

Approved by:

*Michael R. Brown*

Michael R. Brown, CBFO  
Director, Quality Assurance Division

Date:

3/11/2015

## 1.0 EXECUTIVE SUMMARY

U.S. Department of Energy (DOE) Carlsbad Field Office (CBFO) Audit A-15-05 was conducted to evaluate the continued adequacy, implementation, and effectiveness of the Nuclear Waste Partnership LLC (NWP)/Regulatory and Environmental Services (RES) Waste Confirmation Program and applicable elements of the NWP Quality Assurance (QA) Program related to implementation of program procedures and program activities.

The evaluation was to verify the flow-down of upper-tier requirements through the NWP *Quality Assurance Program Description* (NWP QAPD) into applicable NWP procedures, and to determine if the procedures were effectively implemented. The audit was conducted at the Cascades Building in Carlsbad, New Mexico, January 27 – 29, 2015.

One condition adverse to quality (CAQ) was identified during the audit. The CAQ was determined to be isolated in nature and was resolved, verified, and classified as corrected during the audit (CDA) (see section 6.2 for details). No observations were identified during the audit and one recommendation was offered for management consideration (see section 6.4 for details).

Overall, the audit team concluded that the NWP/RES Waste Confirmation Program and implementing procedures evaluated, including the applicable QA Program elements, adequately address upper-tier requirements. The audit team also concluded that the NWP procedures evaluated are satisfactorily implemented and effective in achieving the desired results.

## 2.0 SCOPE AND PURPOSE

### 2.1 Scope

The audit team evaluated the adequacy, implementation, and effectiveness of the NWP/RES Waste Confirmation Program. The following elements were evaluated:

- Quality Assurance (QA) elements
  - Training
  - Records
  
- Waste confirmation through
  - review of visual examination records
  - review of radiography records
  
- Computer programs used for waste confirmation
  - WIPP Waste Information System/Waste Data System (WWIS/WDS)
  - Integrated Data Center (IDC)

The evaluation of the adequacy of the NWP/RES Waste Confirmation Program documents was based on current revisions of the following documents:

- DOE/CBFO-94-1012, *Quality Assurance Program Document (QAPD)*
- Waste Isolation Pilot Plant (WIPP) Hazardous Waste Facility Permit NM 4890139088-TSDF
  - Attachment C7, TRU Waste Confirmation Processes
  - Attachment F1, RCRA Hazardous Waste Management Job Titles and Descriptions
- WP 13-1, *Nuclear Waste Partnership LLC Quality Assurance Program Description*
- WP 02-RC.11, *Qualification and Certification of NDE Personnel Performing Radiography for TRU Waste Confirmation*
- WP 02-RC.12, *Qualification of Personnel Performing Visual Examination for TRU Waste Confirmation*
- WP 02-RC.13, *Conduct of Operations for TRU Waste Confirmation*
- WP 02-RC1101, *Visual Examination for TRU Waste Confirmation*
- WP 02-RC1102, *Review of Radiography Media for TRU Waste Confirmation*
- WP 02-RC1103, *Radiography Inspection Operating Procedure for TRU Waste Confirmation*
- WP 02-RC1105, *Electronic Notification and Container Selection for TRU Waste Confirmation*
- WP 02-RC1107, *Management of Nonconforming Waste Identified During TRU Waste Confirmation*
- WP 02-RC1108, *Review of Visual Examination Records for TRU Waste Confirmation*
- WP 09-CN3031, *Engineering Calculations*
- WP 16-2, *Software Screening and Control*
- NWP applicable implementing procedures

## 2.2 Purpose

Audit A-15-05 was conducted to assess NWP/RES Waste Confirmation Program activities. The audit team also evaluated the NWP/RES Waste Confirmation Program with regard to the requirements of the CBFO QAPD.

## 3.0 AUDIT TEAM AND OBSERVERS

### Auditors/Technical Specialists

Martin Navarrete	Carlsbad Field Office (CBFO) QA Management Representative
Priscilla Y. Martinez	Audit Team Leader, CBFO Technical Assistance Contractor (CTAC)
Tammy Ackman	Auditor, CTAC
Cindi Castillo	Auditor, CTAC

Rhett Bradford	Technical Specialist, CTAC
Porf Martinez	Technical Specialist, CTAC
James Schuetz	Technical Specialist, CTAC

#### **Observers**

None

### **4.0 AUDIT PARTICIPANTS**

Individuals contacted during the audit are identified in Attachment 1. A pre-audit conference was held at the Cascades Building in Carlsbad, New Mexico, on January 27, 2015. The audit was concluded with a post-audit conference at the Cascades Building in Carlsbad, New Mexico, on January 29, 2015.

### **5.0 SUMMARY OF AUDIT RESULTS**

#### **5.1 Program Adequacy, Implementation, and Effectiveness**

The audit team concluded that the NWP/RES Waste Confirmation Program processes evaluated were adequate, satisfactorily implemented, and effective for the areas audited.

NWP/RES Waste Confirmation Program implementing procedures evaluated during the audit are identified in Attachment 2. Attachment 3 is the Summary Table of Audit A-15-05 Results. Details of the audit interview and document review activities are contained in the following sections.

#### **5.2 Quality Assurance Activities**

The audit team reviewed the NWP QAPD, specifically Section 1.1, *Quality Assurance Program and Organization*, to verify that it appropriately translates and provides adequate measures for ensuring the establishment and effective implementation of a QA program, and that it complies with the CBFO QAPD. An NWP QA organizational structure has been established to ensure the fulfillment of the upper-tier requirements.

The audit team reviewed the current revision of implementing procedures WP 02-RC1105, *Electronic Notification and Container Selection for TRU Waste Confirmation*, and WP 02-RC1107, *Management of Nonconforming Waste Identified During TRU Waste Confirmation*, and determined that both procedures adequately address upper-tier requirements.

The audit team interviewed NWP/RES Waste Confirmation Permittee Confirmation Representative (PCR) personnel. The PCR confirmed, through demonstration, that at least 7% of each waste stream shipment is randomly selected for each waste confirmation process. The random selection is automatically generated through the

Waste Data System (WDS). The PCR confirmed that all personnel performing waste confirmation activities are adequately trained and are documented on the Waste Confirmation Training Matrix List of Qualified Individuals.

The audit team verified that the PCR submits a daily list of containers that require waste confirmation to the radiographers and visual examination (VE) personnel. The containers are indicated in the WIPP Confirmation Container Data Reports that are ultimately located in each confirmation package.

The audit team verified that the PCR, operator, independent observer, and independent technical reviewer functions are not performed by the same individual during waste confirmation of any container. Independent observations are performed on two containers per day or two containers per shipment.

The audit team verified that there have been no container rejections since the previous audit. It was also confirmed that required emails and DOE approval/rejection documentation are included in the confirmation data packages for containers prior to shipping activities.

The audit team confirmed there have been no nonconformance reports (NCRs) issued during waste confirmation activities since 2007. Confirmation personnel affirmed that any and all NCRs issued on containers being confirmed are dispositioned prior to shipment approval. If additional NCR disposition information is required, a stop work is imposed until all information is received by the confirmation team.

No concerns were identified. The procedure reviews and objective evidence evaluated during the audit demonstrated that the applicable requirements for container selection and management of nonconforming waste are adequately established for compliance with the upper-tier requirements and are satisfactorily implemented.

### **5.2.1 Records**

The audit team verified that the records generated while performing the waste confirmation process are identified and maintained in accordance with procedures. The audit team verified that the appropriate records were included in the confirmation data packages and were transmitted in accordance with procedures. The waste confirmation records and final disposition requirements are listed in the NWP/RES Records Inventory and Disposition Schedule (RIDS). The audit team verified the confirmation data packages reviewed included the appropriate records and the records were legible, accurate, and complete. Records are maintained in locked Fire King cabinets located at the WIPP site.

The audit team concluded that the record control process was adequate, satisfactorily implemented, and effective.

## 5.2.2 Qualifications and Training

The audit team reviewed documentation to verify that RES Waste Confirmation personnel meet the training requirements of the Hazardous Waste Facility Permit, Attachments C7 and F1, and the CBFO QAPD. The current revisions of implementing procedures WP 02-RC.11, *Qualification and Certification of NDE Personnel Performing Radiography for TRU Waste Confirmation*, and WP 02-RC.12, *Qualification of Personnel Performing Visual Examination for TRU Waste Confirmation*, were also reviewed and found to be adequate and satisfactorily implemented.

The audit team verified that confirmation personnel performing VE, radiography, and PCR activities are appropriately trained and qualified. Interviews were held with responsible personnel. Training records were verified and reviewed at the WIPP Site Training Department records room.

Training files for seven Waste Confirmation Nondestructive Examination (NDE) Radiography Operators (Level 1s and Level 2s) were examined. Record reviews included transcripts, qualification cards, waste stream training/required reading, educational documentation, eye exams, comprehensive exams, and test drum documentation. NDE certification documentation for the operators meet the guidelines established in American Society for Nondestructive Testing (ASNT) Recommended Practice SNT-TC-1A (1980). A summary sheet and formal letter prepared by the Confirmation Program Manager is located in each operator's file attesting that all qualification/certification requirements were met. NDE Radiography Operators (Level 1s and Level 2s) recertify every two years and Wheelis, Inc., is the outside agency that provides the NDE Level 3 services.

Training files for seven Waste Confirmation VE personnel (Level 1s, Level 2s, and VE Experts) were examined. Record reviews included transcripts, qualification cards, capability demonstration documentation, waste stream training, educational documentation, and comprehensive exams. Appointment letters for VE Experts and subject matter expert/on-the-job training were also reviewed. VE personnel requalify every two years.

The audit team verified required reading requirements in WP 02-RC.13, *Conduct of Operations for TRU Waste Confirmation*. Real-time radiography (RTR) and VE personnel are currently trained on newly-developed and revised waste stream profile forms (including when changes are made to (1) waste generating processes, (2) packaging, and (3) expected waste material parameters ). This training is tracked by a PCR through the RES Confirmation required reading database.

Training requirements were also verified for other waste confirmation-related positions, including the designated PCRs and the designated DOE Management Representatives responsible for reviewing the confirmation packages. With the exception of the DOE Management Representative position, all other confirmation-related position training

requirements are tracked on the *WRES List of Qualified Individuals and Waste Confirmation Training Due Matrix* (dated 1/26/15).

The audit team identified one concern regarding a lack of documented evidence for designations/appointments of the DOE Management Representatives responsible for reviewing confirmation packages (see section 6.2, CDA1). During the audit, no objective evidence was provided to document (1) CBFO National TRU Program (NTP) Manager's designation of the current NTP Confirmation Review Lead, and (2) a notification to NWP/RES from the NTP Confirmation Review Lead appointing duty staff (reviewers), as required.

CBFO Management Procedure (MP) 5.1, *Approval of Contractor-Generated Confirmation Data Packages*, Rev. 2, Definition Section 3.2.1, requires: "NTP staff member **designated by the NTP manager** as having primary responsibility for confirmation data package review"; and Section 4.2.3 requires the NTP Confirmation Review Lead to "notify RES of the appointment of duty staff." During the audit, RES Confirmation management provided an email dated 1/29/15 from the NTP Manager designating an NTP staff member as the NTP Confirmation Review Lead. Documentation of the appointment of other duty staff (in preference order) was also provided before audit closeout as required. The objective evidence received provided justification for the concern to be corrected during the audit.

The procedures reviewed and objective evidence assembled and evaluated during the audit indicates that the applicable requirements for Waste Confirmation personnel qualification and training are adequately established for compliance with upper-tier requirements and are satisfactorily implemented and effective.

### **5.3 Waste Confirmation Activities**

#### **5.3.1 Radiography**

The audit team reviewed documentation to verify that NWP/RES Waste Confirmation personnel meet the requirements in the Hazardous Waste Facility Permit Attachment C7 as related to Radiography. The current revisions of implementing procedures WP 02-RC1102, *Review of Radiography Media for TRU Waste Confirmation*, and WP 02-RC1103, *Radiography Inspection Operating Procedure for TRU Waste Confirmation*, were reviewed. The result of the review determined that the procedures adequately address the upper-tier requirements.

The audit team examined 48 confirmation shipment packages from three generator sites: Savannah River Site (SRS), Los Alamos National Laboratory (LANL), and the Idaho National Laboratory (INL), for TRU waste shipped in 2012, 2013, and 2014. The audit team reviewed RTR tapes and the documents for implementation and compliance.

The procedure and document reviews provided evidence that the applicable requirements for the NWP/RES Waste Confirmation Program are adequately

established for compliance with upper-tier requirements, satisfactory in the implementation of these requirements, and effective in achieving the desired results.

### **5.3.2 Visual Examination**

The audit team reviewed documentation to verify that NWP/RES Waste Confirmation personnel meet the requirements in the Hazardous Waste Facility Permit Attachment C7 as related to Visual Examination. The current revisions of implementing procedures WP 02-RC1101, *Visual Examination for TRU Waste Confirmation*, and WP 02-RC1108, *Review of Visual Examination Records for TRU Waste Confirmation*, were reviewed. The results of the review indicated that the referenced procedures adequately address upper-tier requirements.

The audit team interviewed NWP/RES waste confirmation personnel and reviewed 19 VE waste confirmation packages from the SRS, LANL, and INL for TRU waste shipped in 2013 and 2014. The audit team verified NWP/RES VE waste confirmation activities were performed in accordance with WP 02-RC1108, *Review of Visual Examination Records for TRU Waste Confirmation*. NWP/RES procedure WP 02-RC1101, *Visual Examination for TRU Waste Confirmation*, has not been used since the previous audit.

During the review of VE waste confirmation packages, the audit team identified one concern. Confirmation data packages evaluated for VE confirmation include the completion of form EA02RC1102-1-0 (TRU Waste Confirmation (RTR/VE) Approval Form). Procedure WP 02-RC1108, Step 1.2, states: "Obtain form EA02RC1102-1-0 and document the following: ... Media ID Number(s), if applicable." The NWP/RES Carlsbad Team has elected to enter "VE Tech" in the corresponding block of the form to indicate that there is no VE Media ID Number. Although there is no media number associated with VE, the audit team recommended that NWP/RES Waste Confirmation personnel simply enter "N/A"; no further explanation is required in the block (see section 6.4, Recommendation 1).

The procedures reviewed and objective evidence assembled and evaluated during the audit indicate that the applicable requirements for Waste Confirmation through review of VE confirmation packages are adequately established for compliance with upper-tier requirements and are satisfactorily implemented and effective.

### **5.3.3 WWIS/WDS**

The audit team reviewed procedures and conducted interviews with NWP/RES personnel regarding the process for random selection of shipments and containers for performance of waste confirmation activities. The audit team verified that NWP/RES personnel access the WIPP Waste Information System/Waste Data System (WWIS/WDS) and Integrated Data Center (IDC) software applications to review and compare container and batch data report information in the course of performing waste confirmation. Access to the WWIS/WDS is granted and controlled by WWIS/WDS Data Administration personnel. Access to the IDC is granted and controlled by NWP

Program Administration personnel. Software applications are available to all waste confirmation personnel and are accessed on-line for data review and data entry activities. The audit team verified that training of PCR personnel includes demonstration of proficiency with both the WWIS/WDS and IDC on-line software applications. The audit team interviewed WWIS/WDS programming/software QA personnel and verified that the algorithms used for random selection are adequately designed regarding selection criteria and are adequately tested.

The audit team witnessed a demonstration of data review and report generation processes as presented by NWP/RES PCR personnel. The audit team determined that PCR personnel are properly presented with the random selections generated by WWIS/WDS. PCR personnel verify that the scope of containers presented complies with the percentage of waste streams and numbers of containers required for the confirmation process. Waste personnel also adequately identify, log, and perform independent daily oversight of a sample of RTR/VE waste container data in accordance with procedure. A Microsoft Excel spreadsheet is used as a management tool to log the independent observation making the container selection and observation results available to all PCR personnel via the network server.

The audit team reviewed a sample of waste confirmation record packages for the SRS and LANL generator sites. The audit team verified that the following WWIS/WDS reports and IDC reports, which are generated for use in confirmation activities, are included in records packages:

#### WDS

- WWIS TRU Waste Confirmation Module (a report of the random selection of containers indicating the containers to be confirmed, the waste stream for the containers, and the shipment number associated with the containers)
- WIPP Shipment Confirmation Payload Container List (indicating the shipment number and containers, including inner containers)
- WWIS Confirmation Container Data Report (indicating information residing in WWIS/WDS regarding an individual container)

#### IDC

- Container ID Report (indicating the container ID and associated batch data report numbers)

Results of waste confirmation activities for individual shipments are transmitted via e-mail to CBFO for approval. Subsequent CBFO approval of confirmation activities is transmitted to NWP/RES via e-mail. Both the notification of readiness for approval and the grant approval e-mail communications are made part of the confirmation record packages. Completion of NWP/RES confirmation activities and completion of CBFO approval are captured in WWIS/WDS. The audit team determined that confirmation activities in the past 12 months have not indicated the need to reset any container status designations within WWIS/WDS.

The audit team identified no concerns related to the process for random selection of shipments and containers for performance of waste confirmation activities. The procedures reviewed and objective evidence evaluated during the audit demonstrated that the applicable requirements for container selection and waste confirmation activities are adequately established for compliance with the upper-tier requirements and are satisfactorily implemented and effective.

## **6.0 CORRECTIVE ACTIONS, OBSERVATIONS, AND RECOMMENDATIONS**

### **6.1 Corrective Action Reports**

During the audit, the audit team may identify conditions adverse to quality (CAQs), as described below, and document such conditions on corrective action reports (CARs).

Condition Adverse to Quality (CAQ) – An all-inclusive term used in reference to any of the following: failures, malfunctions, deficiencies, defective items, nonconformances, and technical inadequacies.

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

No CAQ necessitating the issuance of a CAR was identified during this audit.

### **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. 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 an isolated case requiring only remedial action and therefore can be corrected during the audit (CDA).

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 according to the definition below.

CDAs – Isolated deficiencies that do 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.

One deficiency, requiring only remedial action, was identified and corrected during the audit.

## **CDA-1**

A concern regarding a lack of documented evidence for designations/appointments of the DOE Management Representatives responsible for reviewing confirmation packages was identified. During the audit, no objective evidence was provided to document (1) CBFO NTP Manager's designation of the current NTP Confirmation Review Lead, and (2) a notification to NWP/RES from the NTP Confirmation Review Lead appointing duty staff (reviewers), as required per CBFO MP 5.1, *Approval of Contractor-Generated Confirmation Data Packages*, Rev. 2, Definition Section 3.2.1, which requires: "NTP staff member **designated by the NTP manager** as having primary responsibility for confirmation data package review"; and Section 4.2.3, which requires the NTP Confirmation Review Lead to "notify RES of the appointment of duty staff."

During the audit, NWP/RES Confirmation management provided an email dated 1/29/15 from the NTP Manager designating an NTP staff member as the NTP Confirmation Review Lead. Documentation of the appointment of other duty staff (in preference order) was also provided before audit closeout, as required. The objective evidence received provided justification for the concern to be corrected during the audit.

### **6.3 OBSERVATIONS**

During the audit, the audit team may identify potential problems or suggestions for improvement that should be communicated to the audited organization. The audit team members, in conjunction with the ATL, evaluate these conditions and classify them as Observations using the following definition:

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

Once a determination is made, the audit team member, in conjunction with the ATL, categorizes the condition appropriately.

No Observations were identified during the audit.

### **6.4 Recommendations**

During the audit, the audit team may identify suggestions for improvement that should be communicated to the audited organization. The audit team members, in conjunction with the ATL, evaluate these conditions and classify them as recommendations using the following definition:

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

Once a determination is made, the audit team member, in conjunction with the ATL, categorizes the condition appropriately.

One Recommendation was presented for NWP/RES management consideration during the audit.

**Recommendation 1**

Confirmation data packages evaluated for VE confirmation include the completion of form EA02RC1102-1-0 (TRU Waste Confirmation (RTR/VE) Approval Form). Procedure WP 02-RC1108, Step 1.2, states: "Obtain form EA02RC1102-1-0 and document the following: ... Media ID Number(s), if applicable." The NWP/RES Carlsbad Team has elected to enter "VE Tech" in the corresponding block of the form to indicate that there is no VE Media ID Number. Although there is no media number associated with VE, the audit team recommends that NWP/RES Waste Confirmation personnel simply enter "N/A"; no further explanation is required in the block.

**7.0 LIST OF ATTACHMENTS**

- Attachment 1: Personnel Contacted During Audit A-15-05
- Attachment 2: Procedures Evaluated During Audit A-15-05
- Attachment 3: Summary Table of Audit A-15-05 Results

<b>PERSONNEL CONTACTED DURING AUDIT A-15-05</b>				
<b>NAME</b>	<b>ORGANIZATION / DEPARTMENT</b>	<b>PREAUDIT MEETING</b>	<b>CONTACTED DURING AUDIT</b>	<b>POSTAUDIT MEETING</b>
Carlsen, Barry	Waste Confirmation		X	X
Galbraith, Ron	Waste Confirmation	X	X	X
Haschets, John	Mgr. Waste Confirmation	X	X	X
Lichty, Tom	Sr. Training Specialist		X	
Luoma, Chris	WWIS/WDS Administrator		X	
Romo, Renee	Records Coordinator		X	
Stegman, Dustin	Permittees Confirmation Representative		X	
Urquidez, Ken	RES/WC Supervisor	X	X	X

<b>Procedures Evaluated During Audit A-15-05</b>		
<b>Number</b>	<b>Doc Number</b>	<b>Applicable Document - Description / Title</b>
1	Hazardous Waste Facility Permit NM 4890139088-TSDF	Attachment C7, TRU Waste Confirmation
2	Hazardous Waste Facility Permit NM 4890139088-TSDF	Attachment F1, RCRA Hazardous Waste Management Job Titles and Descriptions
3	DOE/CBFO-94-1012	Quality Assurance Program Document
4	CBFO MP 5.1	Approval of Contractor-Generated Confirmation Data Packages
5	WP 02-RC.11	Qualification and Certification of NDE Personnel Performing Radiography for TRU Waste Confirmation
6	WP 02-RC.12	Qualification of Personnel Performing Visual Examination for TRU Waste Confirmation
7	WP 02-RC.13	Conduct of Operations for TRU Waste Confirmation
8	WP 02-RC1101	Visual Examination for TRU Waste Confirmation
9	WP 02-RC1102	Review of Radiography Media for TRU Waste Confirmation
10	WP 02-RC1103	Radiography Inspection Operating Procedure for TRU Waste Confirmation
11	WP 02-RC1105	Electronic Notification and Container Selection for TRU Waste Confirmation
12	WP 02-RC1107	Management of Nonconforming Waste Identified During TRU Waste Confirmation
13	WP 02-RC1108	Review of Visual Examination Records for TRU Waste Confirmation
14	WP 13-1	Nuclear Waste Partnership LLC Quality Assurance Program Description
15	WP 16-2	Software Screening and Control

**Summary Table of Audit A-15-05 Results**

Audit Elements	Concern Classification				QA Evaluation		
	CARs	CDAs	Obs	Rec	Adequacy	Implementation	Effectiveness
Training		1			A	S	E
Records					A	S	E
Visual Examination of Records				1	A	S	E
Radiography of Records					A	S	E
WWIS/WDS IDC					A	S	E
<b>TOTALS</b>	<b>0</b>	<b>1</b>	<b>0</b>	<b>1</b>	<b>A</b>	<b>S</b>	<b>E</b>

**Definitions**

CDA = Corrected During Audit  
A = Adequate

CAR = Corrective Action Report  
S = Satisfactory

Rec = Recommendation  
E = Effective

Obs = Observation  
M = Marginal