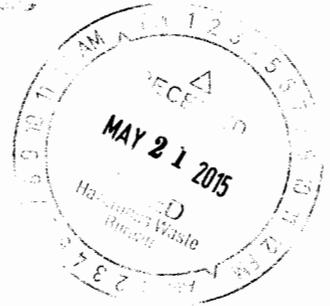




ENTERED

Department of Energy
Carlsbad Field Office
P. O. Box 3090
Carlsbad, New Mexico 88221
MAY 21 2015



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

Subject: Surveillance Report S-15-56, Change-Out of 41-B-856 Moderate Efficiency Filters

Dear Mr. Cannon:

The Carlsbad Field Office conducted the subject surveillance May 15, 2015, at the Waste Isolation Pilot Plant. Results of the surveillance are provided in the enclosed report. No deficiencies were noted.

If you have any questions or comments concerning the surveillance, please contact me at (575) 234-7476.

Sincerely,


Michael R. Brown, Director
Quality Assurance Division

Enclosure

cc:w/enclosure

D. Bryson, CBFO	*ED
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*ED denotes electronic distribution



CBFO SURVEILLANCE REPORT**Surveillance Number:** S-15-56**Date of Surveillance:** May 15, 2015**Surveillance Title:** Change-Out of 41-B-856 Moderate Efficiency Filters**Organization:** Nuclear Waste Partnership LLC (NWP)**Surveillance Team:**

Robert M. Boyko Surveillance Team Lead, Carlsbad Field Office (CBFO) Technical Assistance Contractor (CTAC)

Surveillance Scope:

The surveillance evaluated the performance of work, particularly radiological controls, associated with replacing the Moderate (Mod) Efficiency Filters in the 41-B-856 Filter Banks.

Governing Documents/Requirements:

- Maintenance Work Order 00856, Change Out of 41-B-856 / 857 Mod Efficiency Filters
- Radiation Work Permit #15-204/JS
- Pre-job Briefing form #EA04AD3030-1-0

Activities Evaluated:

The surveillance team evaluated the removal and replacement of the Mod Efficiency Filters in Bank 856 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, a diagram of Building 413, the work status log, Senior Management Review Board screening, a 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, and discussion of Radiation Work Permit (RWP) requirements.

Prior to beginning work, the surveillance team verified all personnel entering the area had signed the appropriate task on the RWP. All personal protective equipment requirements, including dosimetry, were adhered to as required by the RWP.

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. Decontamination of the filter bank floor was performed. Once the room was cleared by Radiological Controls (RadCon), the filter removal began. Each Mod filter

was pulled from the housing by maintenance personnel, placed into an empty box, and 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. In the second contamination area, a second team of maintenance personnel placed the bagged filter into a second bag and sealed it with tape. RadCon then performed radiation and contamination surveys. The survey results 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.

Contamination control techniques/activities performed by RadCon were observed during the filter change-out activities. RadCon personnel were very diligent in maintaining radiological control of the area through such practices as frequent boundary and equipment contamination checks, personnel monitoring, large area wipes, and an abundance of real-time air sample monitoring. Work practice techniques for bagging and sealing filters and trash were found to be excellent. All radiological instrumentation was calibrated and source checked, was in good working condition, and was appropriate for the task. Minimum Detectable Activity (MDA) calculations performed on tabletop counting systems at the job site by the surveillance team verified acceptable MDA values at ~45% of the contamination limit. The surveillance team observed that not all of the maintenance workers were proficient in doffing and area exit techniques. In such cases, RadCon personnel provided both verbal and physical assistance to ensure workers exited the area with no contamination issues.

Surveillance Results:

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

Deficiencies:

None.

Surveillance Team Leader: Robert M. Boyko Date: 20 May 15
 Robert M. Boyko

Assistant Manager/Office Director: N/A Date: N/A

CBFO QA Director Approval: Michael R. B. Date: 5/21/2015