



Department of Energy
 Carlsbad Field Office
 P. O. Box 3090
 Carlsbad, New Mexico 88221
JUL 15 2015



Mr. Dana C. Bryson, Acting Manager
 Carlsbad Field Office
 P.O. Box 3090
 Carlsbad, NM 88221-2078

Subject: Surveillance S-15-50 of CBFO Judgments of Need Training Verification

Dear Mr. Bryson:

The report for Surveillance S-15-50 is enclosed. The surveillance was conducted by the Carlsbad Field Office (CBFO) July 7 – 9, 2015, at the Skeen-Whitlock Building in Carlsbad, NM, to evaluate the status of training-specific actions associated with the Judgments of Need documented in the *February 6, 2015, Corrective Action Plan Addressing the Accident Investigation Reports of: the Underground Salt Haul Truck Fire at the Waste Isolation Pilot Plant, February 5, 2014, and the Phase 1, Radiological Release Event at the Waste Isolation Pilot Plant, on February 14, 2014.*

The surveillance team concluded that training-specific actions are being tracked and objective evidence of completion is being maintained by the CBFO Corrective Actions Manager.

If you have any questions concerning the surveillance, please contact me at (575) 234-7483.

Sincerely,

Martin P. Navarrete
 Senior Quality Assurance Specialist

Enclosure

cc: w/enclosure

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**CARLSBAD FIELD OFFICE
SURVEILLANCE REPORT**

Surveillance Number: S-15-50

Organization: Carlsbad Field Office (CBFO)

Date and Location of Surveillance: July 7 – 9, 2015
Skeen-Whitlock Building, Carlsbad, NM

Surveillance Team:

Martin P. Navarrete	CBFO Management Representative
Katie Martin	Team Leader, CBFO Technical Assistance Contractor (CTAC)
Charlie Riggs	Team Member, CTAC
Jack Walsh	Team Member, CTAC

Surveillance Scope:

The surveillance team evaluated the CBFO corrective action responses to Judgments of Need (JONs) that required training, as documented in the February 6, 2015, Corrective Action Plan Addressing the Accident Investigation Reports of the *Underground Salt Haul Truck Fire at the Waste Isolation Pilot Plant, February 5, 2014*, and the *Phase 1, Radiological Release Event at the Waste Isolation Pilot Plant*, on February 14, 2014.

Activities Evaluated:

The surveillance team reviewed documentation, conducted personnel interviews, and verified the acceptability of applicable CBFO training activities that have been produced in response to the corrective action plan.

The surveillance team evaluated the following actions and their current status related to JONs associated with the underground salt haul truck fire:

Emergency Response

JON 4-1: CBFO Assistant Manager for the Office of Operations Oversight's designated staff will read DOE O 151.1C, *Comprehensive Emergency Management System* to re-familiarize themselves with the requirements of the order. Responsible Individual: CBFO Assistant Manager for the Office of Operations Oversight, Due Date: January 16, 2015

Status: The surveillance team verified that the requirement for at least 80% of the CBFO Assistant Manager, Office of Operations Oversight's designated staff to complete reading DOE Order (O) 151.1C and 30 Code of Federal Regulations (CFR) Part 57, *Safety and Health Standards – Underground Metal and Nonmetal Mines*, to re-familiarize themselves with the requirements of the order and the Federal regulation was completed on or

before January 16, 2015. The required reading was verified by review of objective evidence, which included signed required reading forms.

JON 4-3: Formally train CBFO Manager's designated staff on the new CBFO External Reviews, Surveillances, and Audits Response Procedure. Responsible Individual: CBFO Manager, Due Date: May 1, 2015

Status: The surveillance team verified that the requirement for at least 80% of the CBFO Manager's designated staff to successfully complete training to the new CBFO external reviews, surveillances, and audits response procedure (MP 3.6, Rev. 0, *Management of Reviews Conducted by External Organizations*) was completed on or before May 1, 2015. Verification was achieved by review of objective evidence, which included a CBFO training roster.

JON 5-4: CBFO Manager's designated staff will complete NWP administered training for the WIPP Emergency Response and Operations procedure. Responsible Individual: CBFO Manager, Due Date: June 30, 2015

Status: The surveillance team verified that training for the CBFO Manager's designated staff on the WIPP Emergency Response and Operations procedure was scheduled to be completed on or before June 30, 2015. The WIPP Emergency Response and Operations procedure is still undergoing development/revision, therefore no staff members have been designated for training and no training has been performed.

JON 7-1: CBFO Assistant Manager for the Office of Operations Oversight's designated staff will successfully complete the following National Incident Management System (NIMS) Incident Command System (ICS) Training Courses: IS-700a: NIMS, An Introduction; ICS 100.b: Introduction to Incident Command System, or IS-100.FWA: Intro to Incident Command System (IS-100) for Federal Workers; IS-200.b: ICS for Single Resources and Initial Action Incidents. Completion of these courses is necessary to obtain and demonstrate core competency for providing oversight of the WIPP Emergency Management Program. Responsible Individual: CBFO Assistant Manager for the Office of Operations Oversight, Due Date: January 30, 2015

Status: The surveillance team verified that the designated staff for the CBFO Assistant Manager, Office of Operations Oversight, successfully completed NIMS ICS Training Courses IS-700.a, IS-100.b or IS-100.FWA, and IS-200.b to obtain and demonstrate core competency for providing oversight of the WIPP Emergency Management Program. The surveillance team verified the action was completed on or before January 30, 2015. Verification was achieved by review of objective evidence, which included course completion certificates.

JON 9-1: The CBFO Assistant Manager for the Office of Operations Oversight's designated staff will read DOE O 420.1C, *Facility Safety*, DOE-STD-1066-2012, *Fire Protection*, and 30 CFR Part 57, *Safety and Health Standards – Underground Metal and Nonmetal Mines*, to re-familiarize themselves with the requirements of the orders. In addition, a required briefing will be held by CBFO Subject Matter Experts that explain the requirements of the documents and how they apply to WIPP. Responsible Individual: CBFO Assistant Manager for the Office of Operations Oversight, Due Date: January 16, 2015

Status: The surveillance team verified that the requirement for at least 80% of the CBFO Assistant Manager, Office of Operations Oversight's designated staff to complete reading DOE O 420.1C, DOE-STD-1066-2012, and 30 CFR Part 57 to re-familiarize themselves with the requirements of the orders was scheduled to be completed on or before January 16, 2015. It was noted that the 30 CFR Part 57 briefing was not completed until April 15, 2015. The required reading was verified by review of objective evidence, which included signed required reading forms.

Maintenance Program

JON 14-2: The CBFO Assistant Manager for the Office of Operations Oversight's designated staff will successfully complete the DOE Self-Study Program for DOE O 433.1, *Maintenance Management Program for DOE Nuclear Facilities*, to obtain and demonstrate core competency for providing oversight of the WIPP Maintenance Program activities. Responsible Individual: CBFO Assistant Manager for the Office of Operations Oversight, Due Date: January 30, 2015

Status: The surveillance team verified that the requirement for at least 80% of the CBFO Assistant Manager, Office of Operations Oversight's designated staff to successfully complete the DOE Self-Study Program for DOE O 433.1 to obtain and demonstrate core competency for providing oversight of the WIPP Maintenance Program activities was scheduled to be complete on or before January 30, 2015. The objective evidence files contained only signed required reading forms. There was no evidence of completion of the Self-Study Program.

JON 14-4: Formally train CBFO Manager's designated staff on the new CBFO *Contractor Oversight Plan* to obtain and demonstrate core competency for providing oversight. Responsible Individual: CBFO Manager, Due Date: March 30, 2015

Status: The surveillance team verified that the requirement for at least 80% of the CBFO Manager's designated staff to successfully complete training to the CBFO *Contractor Oversight Plan* was scheduled to be complete on or before March 30, 2015. The new *CBFO Contractor Oversight Plan* is still

undergoing development, therefore no staff members have been designated for training and no training has been performed.

JON 14-6: Provide training to CBFO Assistant Manager for the Office of Operations Oversight's designated staff on MP 10.9 and DOE/CBFO 14-3533.
Responsible Individual: CBFO Assistant Manager for Office of Operations Oversight, Due Date: October 9, 2014

Status: The surveillance team verified that the requirement for at least 80% of the CBFO Assistant Manager, Office of Operations Oversight's designated staff to complete training on CBFO MP 10.9 and DOE/CBFO 14-3533 was completed on or before October 9, 2014. The training was verified by review of objective evidence, which included training class rosters. Both documents have been revised with substantial changes after the completion of this training.

DOE Programs and Oversight

JON 24-3: The CBFO Assistant Manager of the Office of Operations Oversight's designated staff will read DOE O 226.1B, *Implementation of the Department of Energy Oversight Policy*, to re-familiarize themselves with the requirements of the order. In addition, a required briefing will be held by the CBFO Subject Matter Experts that explain the requirements of the Policy, Order, and associated Guide and how they apply to WIPP.
Responsible Individual: CBFO Assistant Manager for Office of Operations Oversight, Due Date: February 1, 2015

Status: The surveillance team verified that the requirement for at least 80% of the CBFO Assistant Manager, Office of Operations Oversight's designated staff to complete reading DOE O 226.1B and receive a briefing by CBFO Subject Matter Experts that explained the requirements of the Policy, Order, and associated Guide and how they apply to WIPP was completed on or before February 1, 2015. The training was verified by review of objective evidence, which included signed required reading forms.

JON 24-4: The CBFO Assistant Manager of the Office of Operations Oversight's designated staff will successfully complete DOE National Training Center courses SAF-384, *DOE Oversight and Implementation*, and SAF-385, *Assessment Techniques*, to obtain and demonstrate core competency for providing DOE oversight activities. Responsible Individual: CBFO Assistant Manager for Office of Operations Oversight, Due Date: March 31, 2015

Status: The surveillance team verified that the requirement for the designated staff of the CBFO Assistant Manager, Office of Operations Oversight to successfully complete DOE National Training Center courses SAF-384 and SAF-385 to obtain and demonstrate core competency for providing DOE oversight activities was completed on or before March 31, 2015.

The training was verified by review of objective evidence, which included course completion certificates.

JON 24-9: Formally train CBFO personnel on the revised CBFO *Document Review*, MP 4.2. Responsible Individual: CBFO Manager, Due Date: March 1, 2015

Status: The surveillance team verified that the requirement for at least 80% of the CBFO Manager's designated staff to successfully complete training to the revised CBFO MP 4.2 was completed on or before March 1, 2015. The required reading was verified by review of objective evidence, which included signed required reading forms.

JON 25-1: Provide training to CBFO Assistant Manager for the Office of Operations Oversight's designated staff on MP 10.9 and DOE/CBFO 14-3533. Responsible Individual: CBFO Quality Assurance Director, Due Date: October 9, 2014

Status: The surveillance team verified that the requirement for at least 80% of the CBFO Assistant Manager, Office of Operations Oversight's designated staff to complete training on CBFO MP 10.9 and DOE/CBFO 14-3533 was completed on or before October 9, 2014. The training was verified by review of objective evidence, which included training class rosters. Both documents have been revised with substantial changes after the completion of this training.

Safety Program

JON 33-1: The CBFO Assistant Manager to the Office of Operations Oversight and designated staff will read DOE O 422.1, *Conduct of Operations*, to re-familiarize themselves with the requirements of the order. Responsible Individual: CBFO Assistant Manager for Office of Operations Oversight, Due Date: January 16, 2015

Status: The surveillance team verified that the requirement for at least 80% of the CBFO Assistant Manager, Office of Operations Oversight's designated staff to complete reading DOE O 422.1 to re-familiarize themselves with the requirements of the order was completed on or before January 16, 2015. The required reading was verified by review of objective evidence, which included signed required reading forms.

JON 33-2: The CBFO Assistant Manager to the Office of Operations Oversight's designated staff will successfully complete DOE National Training Center course SAF-261, *Conduct of Operations*, to obtain and demonstrate core competency for providing DOE oversight activities. Responsible Individual: CBFO Assistant Manager for Office of Operations Oversight, Due Date: May 30, 2015

Status: The surveillance team verified that the requirement for at least 80% of the CBFO Assistant Manager, Office of Operations Oversight's designated staff to successfully complete DOE National Training Center course SAF-261 to obtain and demonstrate core competency for providing DOE oversight activities was completed on or before May 30, 2015. The training was verified by review of objective evidence, which included signed attendance roster/sign-in sheets.

JON 35-2: All CBFO personnel will receive training on DOE/CBFO 09-3442, *CBFO Integrated Safety Management System Description*. Responsible Individual: CBFO Assistant Manager for Office of Operations Oversight, Due Date: February 28, 2015

Status: The surveillance team verified that the requirement for at least 80% of the CBFO Assistant Manager, Office of Operations Oversight's designated staff to complete reading DOE/CBFO 09-3442, *CBFO Integrated Safety Management System Description*, as well as mandatory training on the document, was scheduled to be complete on or before February 28, 2015. The surveillance team learned that DOE/CBFO 09-3441, *Safety Management Functions, Responsibilities, and Authorities Manual (FRAM)*, must be revised and included in the training for DOE/CBFO 09-3442. DOE/CBFO 09-3441 was approved on June 12, 2015.

JON 35-3: Conduct Safety Conscious Work Environment (SCWE) training for CBFO leadership to reinforce CBFO's commitment to the principles of an integrated safety management system. Responsible Individual: CBFO Manager, Due Date: December 15, 2014

Status: The surveillance team verified that the requirement for at least 80% of the CBFO staff to complete mandatory training on a safety conscious work environment was scheduled to be completed on or before December 15, 2014. The objective evidence files contained only attendance rosters. There was no objective evidence of designated CBFO staff required to complete this training.

The surveillance team evaluated the following actions and their current status related to JONs associated with the radiological release event:

Nuclear Safety Program

JON 10-1: The CBFO Assistant Manager to the Office of Operations Oversight's designated staff will read 10 CFR 830 Subpart B, *Safety Basis Requirements*, and DOE-STD-1104-2009, *Review and Approval of Nuclear Facility Safety Basis and Safety Design Basis Documents*, to re-familiarize themselves with the requirements of the orders. Responsible Individual: CBFO Assistant Manager for the Office of Operations Oversight, Due Date: January 16, 2015

Status: The surveillance team verified that the requirement for at least 80% of the CBFO Assistant Manager, Office of Operations Oversight's designated staff to complete reading 10 CFR 830 Subpart B, *Safety Basis Requirements*, and DOE-STD-1104-2009, *Review and Approval of Nuclear Facility Safety Basis and Safety Design Basis Documents*, to re-familiarize themselves with the requirements of the orders was completed on or before January 16, 2015. Verification was achieved by review of objective evidence, which included signed required reading forms.

JON 10-2: The CBFO Assistant Manager for the Office of Operations Oversight's designated staff will successfully complete DOE National Training Center courses SAF-270, *Safety Systems Oversight Duties and Responsibilities*, SAF-385, *Assessment Techniques*, and SAF-784, *Review and Approval of Nuclear Safety Basis Documents*, to obtain and demonstrate core competency for providing DOE oversight activities. Responsible Individual: CBFO Assistant Manager for the Office of Operations Oversight, Due Date: May 31, 2015

Status: The surveillance team verified that the requirement for at least 80% of the CBFO Assistant Manager, Office of Operations Oversight's designated staff to successfully complete DOE National Training Center courses SAF-270, *Safety Systems Oversight Duties and Responsibilities*, SAF-385, *Assessment Techniques*, and SAF-784, *Review and Approval of Nuclear Safety Basis Documents*, to obtain and demonstrate core competency for providing DOE oversight activities, was completed on or before May 31, 2015. Verification was achieved by review of objective evidence, which included course completion certificates.

JON 10-4: CBFO Assistant Manager for the Office of Operations Oversight's designated staff will be trained on the MP 4.11 revision prior to review of the revised NWP Safety Basis document. Responsible Individual: CBFO Assistant Manager for the Office of Operations Oversight, Due Date: May 15, 2015

Status: The surveillance team verified that the requirement for at least 80% of the CBFO Assistant Manager, Office of Operations Oversight's designated staff to complete training on CBFO MP 4.11 was scheduled to be completed on or before May 15, 2015. MP 4.11 is still undergoing revision, therefore no staff members have been designated for training and no training has been performed.

Radiation Protection Program

JON 36-2: The CBFO Assistant Manager for the Office of Operations Oversight's designated staff will successfully complete DOE National Training Center course: SAF-385, *Assessment Techniques*, to obtain and demonstrate core competency for performing readiness review assessment of the radiation protection. Responsible Individual: CBFO

Assistant Manager for the Office of Operations Oversight, Due Date:
May 31, 2015

Status: The surveillance team verified that the requirement for at least 80% of the CBFO Assistant Manager, Office of Operations Oversight's designated staff to successfully complete SAF-385, *Assessment Techniques*, to obtain and demonstrate core competency for performing readiness review assessment of the radiation protection was completed on or before May 31, 2015. Verification was achieved by review of objective evidence, which included course completion certificates.

Surveillance Results:

The individuals responsible for each required action were identified and were appropriate to the area surveilled and the action required. All training actions that were not completed on or prior to the assigned due date were previously self-identified by the CBFO Corrective Actions Manager. A request for extension of due dates for four of the corrective actions (JONs 5-4, 10-4, 14-4, and 35-2) was submitted from the CBFO Manager to the Deputy Assistant Secretary for Safety, Security, and Quality Programs, EM-40, on May 27, 2015, via CBFO memorandum CBFO:OOM:JRF:MAG:15-0014. However, concurrence with the request for extension of due dates has not yet been received.

The surveillance team determined that training-specific actions related to the *February 6, 2015, Corrective Action Plan Addressing the Accident Investigation Reports of the Underground Salt Haul Truck Fire at the Waste Isolation Pilot Plant, February 5, 2014, and the Phase 1, Radiological Release Event at the Waste Isolation Pilot Plant, on February 14, 2014*, are being tracked and objective evidence of completion is being managed by the CBFO Corrective Actions Manager.

Prepared by: Katie Martin
Katie Martin, CTAC
Surveillance Team Leader

Date: 7-10-15

Concurrence by: Martin P. Navarrete
Martin P. Navarrete, CBFO
Senior Quality Assurance Specialist

Date: 7-15-15