



Department of Energy
Carlsbad Field Office
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JUL 19 2016

Mr. John E. Kieling, Bureau Chief
Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, NM 87508-6303

Subject: Description of the Evaluation Process for Permit Required Inspections and Current Status

Dear Mr. Kieling:

The purpose of this letter is to describe the Extent of Condition (EOC), review and other actions underway to address some recent concerns we identified pertaining to Permit-required inspections. It also serves as a follow-up to the May 5, 2016, teleconference and the May 16, 2016, meeting with you and your staff on this subject.

Immediate actions were taken by the Permittees to ensure that Permit-required inspections at the Waste Isolation Pilot Plant (WIPP) facility are being performed and documented as required by the Permit. These actions ensure the accuracy of the information retained in the facility Operating Record and being reported to you in the Quarterly Status Report (Quarterly Report), in accordance with the New Mexico Environment Department (NMED) Administrative Orders.

Two teams were formed to implement immediate actions and an EOC review. Immediate actions were identified to ensure that inspections are being performed and appropriately documented in the required timeframe. This ensures not only the accuracy and completeness of inspection records being developed but also the accuracy of future submittals to the NMED. The EOC activities were performed for the first calendar quarter of 2016 to ensure that inspections were performed in accordance with the Permit requirements and to ensure that this submittal to the NMED was accurate. The EOC review has been completed and the results are being evaluated.

The following summarizes the immediate actions and the EOC review.

Immediate Actions – Team 1

The team is reviewing inspection records generated from April 1, 2016, to the present. This review will continue until the Permittees are satisfied with the quality of the inspections and the accuracy of the records.



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The actions performed by this team include the following:

- Permit-required inspection records are being reviewed by the Permittees' environmental compliance section before being designated as "complete", in the Permittees' automated maintenance tracking program (CHAMPS). Note that CHAMPS is an electronic database/tracking system that is used to schedule and track facility inspections. Entries in CHAMPS are being adjusted, as needed, if an inspection or documentation requirement is not met.
- Affected organization(s) are being briefed on the performance and proper documentation of Permit inspections and discussions with Environmental Compliance are being held regarding inadequacies.
- Occurrence Reporting and Processing System (ORPS) reporting determination was performed and an ORPS report was issued on May 9, 2016.

Extent of Condition – Team 2

The actions performed by this team include the following:

- Permit requirements that are captured in Attachment 1, List of Surface and Underground Inspections and reported in the Quarterly report for January – March 2016 were verified for accuracy.
- Documents such as procedures implementing inspections were verified to be in place to address the Permit inspection requirements.
- Each inspection record was validated to ensure it was completed accurately and meets Permit requirements.
- Results are being evaluated to determine if further EOC reviews are necessary.

The inspection records are being checked for compliance with Permit Attachment E. The following questions are being used to address the requirements:

- Were inspections performed on time (within the frequencies listed in Permit Attachment E, Table E-1) and consistent with the implementing procedures?
- Are actions being taken to address concerns (i.e., items failing inspection are corrected, additional inspections are scheduled for equipment needing repair, or Action Request (AR) for repair submitted) recorded on the inspection form, the CHAMPS work order sheet, or the equipment logbook, whichever is applicable?
- Does each inspection record contain the inspector's name, date, and time as required by the Permit and implementing procedures?

Discrepancies identified are being screened against the reporting requirements in Permit Part 1, Sections 1.7.13., *24 Hour and Subsequent Reporting* and 1.7.14., *Other Noncompliance*. To date, no discrepancies require 24-hour and subsequent reporting. Discrepancies identified as noncompliant will be reported at the time the monitoring reports are submitted annually to the NMED in October.

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As an additional immediate action, training has been conducted for personnel performing Permit-required inspections, to ensure inspection documentation is complete. The initial training was conducted on May 12, and 13, 2016, and covered all four shifts of the Fire Fighter/Emergency Management personnel. Additional training will be scheduled, depending on the results of the EOC review. In addition to the training, mentors are walking down the inspection procedures with the facility personnel to observe performance and provide guidance as necessary to ensure complete and consistent documentation of inspection results.

In order to identify and correct self-identified concerns within the Permit-required inspection program, the Permittees conducted a Root Cause Analysis to ensure that long-term corrective actions are identified to prevent recurrence. Corrective actions will be tracked in accordance with the WIPP procedures.

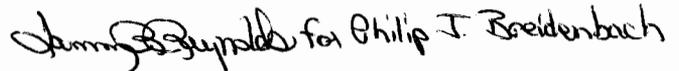
Once these inspection evaluations have been completed, the Permittees will provide you the results of the evaluations, improvements made to the inspection process, and corrections to previously-submitted information (e.g., i.e.), first 2016 Quarterly Report) as applicable.

Please contact Mr. George T. Basabilvazo at (575) 234-7488 if you have any questions.

Sincerely,



Todd Shrader, Manager
Carlsbad Field Office



Philip J. Breidenbach, Project Manager
Nuclear Waste Partnership LLC

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