Subject: Surveillance Report S-16-45, Nuclear Waste Partnership LLC Technical Training Program; RCRA Hazardous Waste Management Job Titles and Descriptions (HWFP Attachment F1)

Dear Mr. Cannon:

Enclosed is the report for Carlsbad Field Office (CBFO) Surveillance S-16-45, Nuclear Waste Partnership LLC (NWP) Technical Training Program in accordance with the requirements of the Resource Conservation and Recovery Act (RCRA), Hazardous Waste Management Job Titles and Descriptions (Hazardous Waste Facility Permit [HWFP Attachment F1]). The surveillance was performed August 9, 2016, at the Waste Isolation Pilot Plant near Carlsbad, NM.

As a result of this surveillance, it was determined that the RCRA Hazardous Waste Management Job Titles and Descriptions (HWFP Attachment F1) listed in the surveillance plan have been established, maintained, and implemented in accordance with requirements.

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

Sincerely,

Michael R. Brown, Director
CBFO Office of Quality Assurance

Enclosure

cc: w/enclosure
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CBFO SURVEILLANCE REPORT

Surveillance Number:  S-16-45  Date of Surveillance:  August 9, 2016

Surveillance Title:  NWP Technical Training Program: RCRA Hazardous Waste Management Job Titles and Descriptions (HWFP Attachment F1)

Organization:  Nuclear Waste Partnership LLC (NWP)

Surveillance Team:

Michael R. Brown  Management Representative, Carlsbad Field Office (CBFO), Office of Quality Assurance
Katie Chester  Surveillance Team Leader, CBFO Technical Assistance Contractor (CTAC)

Surveillance Scope:

The scope of the surveillance was to verify the adequate flow down of the requirements as defined in the Waste Isolation Pilot Plant (WIPP) Hazardous Waste Facility Permit (HWFP), Number NM4890139088-TSDF, Attachment F1, RCRA Hazardous Waste Management Job Titles and Descriptions into NWP Technical Training documents, and to verify personnel identified to perform those activities were qualified.

The surveillance included a verification of documentation (procedures and training records) pertaining to the NWP Technical Training activities associated with WIPP HWFP Attachment F1. The surveillance team conducted interviews with responsible personnel, and examination of training documents and records.

This surveillance is associated with CBFO Surveillances S-16-43, -44, -47, and -48.

Activities Evaluated:

The surveillance team reviewed the NWP HWFP Position Training List which includes the name of each employee holding a hazardous waste management-related position and each of the positions they hold. The RCRA Hazardous Waste Management Job Titles reviewed for this surveillance are listed below:

Quality Assurance Technician
Team Leader, Inspection Services
Facility Inspection, Repair, and Service Team (FIRST) Leader
Facility Inspection, Repair, and Service Team (FIRST)
Surveillance Results:

The surveillance team reviewed training records for individuals holding an RCRA hazardous waste management-related position, including a roster of employees, list of courses required for each position, course descriptions, documentation when each employee has received and completed appropriate training, and backup information regarding qualification and examinations.

Quality Assurance Technicians

Training records for a group of Quality Assurance Technicians identified from the HWFP Position Training List were verified against the RCRA Hazardous Waste Management Job Descriptions in Attachment F1 of the HWFP. Also, individual training records for four Quality Assurance Technicians were reviewed and determined to be current and complete per the requirements of the HWFP Attachment F1.

Team Leader, Inspection Services

Training records for the Inspection Services Team Leader identified from the HWFP Position Training List were verified against the RCRA Hazardous Waste Management Job Descriptions in Attachment F1 of the HWFP. The training records for the Inspection Services Team Leader were reviewed and determined to be current and complete per the requirements of the HWFP Attachment F1.

Facility Inspection, Repair, and Service Team (FIRST) Leader

There were no individuals designated as FIRST Leader on the HWFP Position Training List; therefore, no training records were reviewed for the position.

Facility Inspection, Repair, and Service Team (FIRST)

Training records for the FIRST members identified from the HWFP Position Training List were verified against the RCRA Hazardous Waste Management Job Descriptions in Attachment F1 of the HWFP. The surveillance team reviewed three FIRST members' training records and found one individual did not complete the biennial requalification for HMT-102, Hazardous Materials and Waste Transportation.

Concerns:

None.
Conclusions:

The surveillance team concluded that requirements as defined in the Waste Isolation Pilot Plant (WIPP) Hazardous Waste Facility Permit (HWFP), Number NM4890139088-TSDF, Attachment F1, RCRA Hazardous Waste Management Job Titles and Descriptions are adequately incorporated into NWP Technical Training documents, and the personnel identified to perform those activities were qualified.

Surveillance Team Leader: Katie Chester

Date: 8-11-16

Katie Chester

CBFO QA Director Approval: [Signature]

Date: 8/25/16