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Department of Energy
Carlsbad Field Office
P. O. Box 3090
Carlsbad, New Mexico 88221
AUG 29 2016

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

Subject: Surveillance Report S-16-48, 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-16-48, 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 (WIPP) near Carlsbad, NM.

The surveillance resulted in a determination that requirements as defined in the WIPP HWFP, Attachment F1, RCRA Hazardous Waste Management Job Titles and Descriptions, are adequately incorporated into NWP Technical Training documents for Radiographer (Confirmation Team) Levels 1 & 2 and Visual Examination Operator/Expert (Confirmation Team) Levels 1 & 2, and the personnel identified to perform those activities were qualified.

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-16-48 **Date of Surveillance:** August 9, 2016

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

Organization Assessed: Nuclear Waste Partnership LLC (NWP)

Surveillance Team: Kathy Hood 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, -45, and -47.

Surveillance Results:

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. NWP Technical Training is responsible for producing the HWFP Position Training List and providing it to cognizant line managers monthly. Line managers are accountable for ensuring that the HWFP Position Training List is accurate each month. The HWFP Position Training List utilized for this surveillance was dated August 2016.

The RCRA Hazardous Waste Management Job Titles reviewed in this surveillance are listed below:

- Radiographer Level 1 (Radiography Independent Technical Reviewer) (Confirmation Team)
- Radiographer Level 2 (Radiography Independent Technical Reviewer) (Confirmation Team)
- Visual Examination Operator/Expert Level 1 (VE Independent Technical Reviewer) (Confirmation Team)

**Visual Examination Operator/Expert Level 2 (VE Independent Technical Reviewer)
(Confirmation Team)
DOE Management Representative**

Qualifications and training for radiographers and visual examination operators involved in the waste characterization process are evaluated during the TRU waste site certification/recertification audits.

The surveillance team reviewed a list of courses required for each position, course descriptions, documentation when each employee received and completed appropriate training, and backup information regarding qualification and examinations.

Radiographer Level 1 & Level 2 (Radiography Independent Technical Reviewer)

Training records for a group of Radiographers (Radiography Independent Technical Reviewers [ITRs]), Level 1 and Level 2, identified from the HWFP Position Training List were verified against the RCRA Hazardous Waste Management Job Descriptions in Attachment F1 of the HWFP. Individual training records for seven of the ten Level 1 and/or Level 2 Radiographers/ITRs named on the HWFP Position List were reviewed and determined to be current and complete per the requirements of the HWFP Attachment F1.

Visual Examination Operator/Expert Level 1 & Level 2 (VE Independent Technical Reviewer)

Training records for a group of Visual Examination Operators/Expert Level 1 and Level 2 (VE ITRs) identified from the HWFP Position Training List were verified against the RCRA Hazardous Waste Management Job Descriptions in Attachment F1 of the HWFP. Individual training records for seven of the ten Visual Examination Operators/Expert Level 1 and/or Level 2 VE ITRs named on the HWFP Position List were reviewed and determined to be current and complete per the requirements of the HWFP Attachment F1.

DOE Management Representative

Department of Energy (DOE) personnel training records are not maintained by NWP; therefore, this RCRA Hazardous Waste Management job title will be reviewed during Surveillance S-16-22, Carlsbad Field Office Required Training.

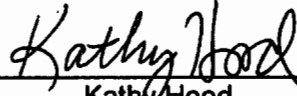
Concerns:

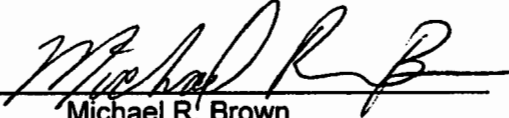
None.

Conclusions:

The surveillance team concluded that requirements as defined in the WIPP HWFP, Number NM4890139088-TSDF, Attachment F1, RCRA Hazardous Waste Management Job Titles and Descriptions, are adequately incorporated into NWP Technical Training documents for Radiographer (Confirmation Team) Levels 1 & 2 and Visual Examination

Operator/Expert (Confirmation Team) Levels 1 & 2, and the personnel identified to perform those activities were qualified.

Surveillance Team Leader:  Date: 8-25-16
Kathy Hood

CBFO OQA Director Approval:  Date: 8-25-16
Michael R. Brown