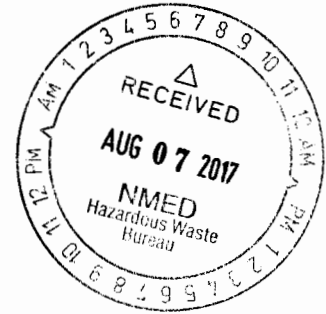




ENTERED

Department of Energy
Carlsbad Field Office
P. O. Box 3090
Carlsbad, New Mexico 88221
AUG 07 2017



Ms. Mary McDaniel, Manager
Quality and Contractor Assurance
Nuclear Waste Partnership LLC
P.O. Box 2078
Carlsbad, NM 88221-2078

Subject: Issuance of Report for Surveillance S-17-43, NWP TRU Waste Inventory Inspection at WCS

Dear Ms. McDaniel:

Enclosed is the report for Carlsbad Field Office (CBFO) Surveillance S-17-43, Nuclear Waste Partnership LLC (NWP) Transuranic (TRU) Waste Inventory Inspection at Waste Control Specialists LLC (WCS). The surveillance was performed on July 25, 2017, at the WCS facility in Andrews, TX. As described in detail in the report, the surveillance team concluded that the activities evaluated are adequate, effective, and satisfactorily implemented for compliance with applicable procedures.

If you have any questions concerning the surveillance, please contact me at (575) 234-7491.

Sincerely,

[Handwritten signature]

Dennis S. Miehl
Senior Quality Assurance Specialist

Enclosure

cc: w/enclosure

- J. Carswell, CBFO *ED
M. Brown, CBFO ED
M. Navarrete, CBFO ED
M. Stapleton, CBFO ED
M. Fineran, CBFO ED
J. Britain, NWP ED
A.J. Fisher, NWP ED
B. Pace, NWP ED
V. Ballew, NWP ED
S. Saiz, NWP ED
A. Boyea, NWP ED
M. Percy, NWP ED
R. Lee, NWP ED
J. Knox, NWP ED
K. Gonzalez, WCS ED
J. Walsh, EPA ED
J. Ellis, EPA ED
T. Peake, EPA ED
J. Kieling, NMED ED
R. Maestas, NMED ED
D. Biswell, NMED ED
T. Runyon, CTAC ED
P. Martinez, CTAC ED
C. Castillo, CTAC ED
M. Leroch, CTAC ED
B. Tousley, CTAC ED
D. Harvill, CTAC ED
G. White, CTAC ED
WIPP Operating Record ED
CBFO QA File
CBFO M&RC
*ED denotes electronic distribution



CBFO SURVEILLANCE REPORT

Surveillance Number: S-17-43

Date of Surveillance: July 25, 2017

Surveillance Title: NWP TRU Waste Inventory Inspection at Waste Control Specialists LLC (WCS)

Organization

Assessed: Nuclear Waste Partnership LLC (NWP)

Surveillance Team:

Dennis S. Miehl	Carlsbad Field Office (CBFO) Quality Assurance (QA) Representative
Brian Tousley	Surveillance Team Leader, CBFO Technical Assistance Contractor (CTAC)
B.J. Verret	Surveillance Team Member (CTAC)

Surveillance Scope:

Surveillance S-17-43 evaluated implementation and effectiveness of NWP Central Characterization Program (CCP) procedure CCP-TP-199, *CCP/WCS CH TRU Waste Inventory Control*, for the control of contact-handled (CH) transuranic (TRU) waste containers temporarily stored at the WCS facility in Andrews, TX.

This surveillance also evaluated the implementation and effectiveness of NWP container management, segregation, HOLD tagging, and nonconformances.

The scope of the surveillance included interviews with responsible personnel within the NWP CCP and WCS organizations and review of applicable supporting documentation.

Governing Documents/Requirements:

- CCP-PO-042, Rev. 1, *CCP/WCS Interface Document*
- CCP-TP-199, Rev. 2, *CCP/WCS CH TRU Waste Inventory Control*
- DOE/CBFO-94-1012, Rev. 13, *Quality Assurance Program Document*

Activities Evaluated:

The surveillance team reviewed the CCP container inventory lists used by WCS to validate inventory, specifically the WCS TRU Waste Inventory Document and the Waste Data System (WDS) Inventory List. The WCS TRU Waste Inventory Document is a record of received containers at WCS. The WDS Inventory List is developed from input by CCP personnel at the generator sites. The surveillance also evaluated control of the of the CH TRU waste containers temporarily stored at the WCS facility in Andrews, TX. A representative sample of containers was verified by the surveillance team against the WCS TRU Waste Inventory Document, the WDS Inventory List, and the identification markings on the containers themselves.

The team reviewed the CCP/WCS Monthly Inventory Review Checklist completed for July 25, 2017, as well as monthly required reviews for each calendar month this year, namely: January 25, February 22, March 22, April 12, May 24, and June 26, 2017. TRU waste containers with nonconformance reports (NCRs) were found segregated from conforming containers, and HOLD tags were applied in accordance with CCP-QP-005, *CCP TRU Nonconforming Item Reporting and Control*.

Container numbers listed on the WCS TRU Waste Inventory Document were found to match the container numbers listed on the WDS Inventory List and on the containers themselves. Also, no containers were found in the TRU waste segregated areas that were not included on the WDS Inventory List.

The surveillance team interviewed WCS QA personnel and verified WCS conducts periodic audits and surveillances for activities associated with the temporary storage of TRU waste containers, as specified in CCP-PO-042, *CCPWCS Interface Document*. The surveillance team also reviewed WCS surveillance reports associated with TRU waste container storage: S-WCS-15-019, performed 12/1/2015, and S-WCS-16-024, performed 5/10/2016.

The team also verified that NCR documentation is provided to the WCS STR (Site Technical Representative)/Designee for containers provided to WCS for storage. This documentation included NCRs LANL 0173-17, 0174-17, 0175-17, 0169-17, 0171-17, 0172-17, 0258-17, and 0128-17.

The surveillance team reviewed Site Project Manager (SPM) qualifications of the two CCP SPMs performing monthly reviews of WCS container management.

The team observed two instances of TRU waste not being segregated with barriers and signs. These conditions were immediately corrected during the surveillance by WCS personnel. The action was documented on the July 25, 2017 CCP/WCS Monthly Inventory Review Checklist (Attachment 1 from CCP-TP-199, Rev. 2).

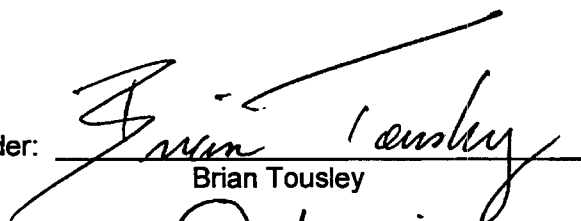
Surveillance Results:

Overall, the surveillance team determined that the activities associated with CH TRU waste inventory control at WCS were satisfactorily conducted and implemented in accordance with CCP-TP-199, Rev. 2, *CCPWCS CH TRU Waste Inventory Control*, and CCP-PO-042, Rev. 1, *CCPWCS Interface Document*.

Deficiencies:

None.

Surveillance Team Leader:


Brian Tousley

Date:

7 August 2017

CBFO QA Representative:


Dennis S. Miehl

Date:

8-7-17