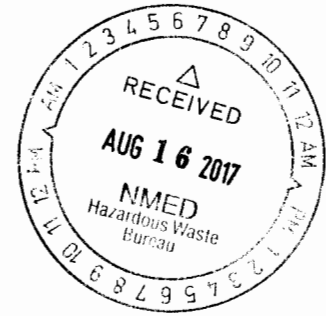




ENTERED

Department of Energy
Carlsbad Field Office
P. O. Box 3090
Carlsbad, New Mexico 88221
AUG 16 2017



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

Subject: Surveillance Report S-17-13, Nuclear Waste Partnership LLC Hazardous Waste Transportation Vendors/Resource Conservation and Recovery Act Hazardous Materials Transporter Services

Dear Ms. McDaniel:

The Carlsbad Field Office (CBFO) conducted the subject surveillance on August 8, 2017 at the Waste Isolation Pilot Plant. The surveillance report is attached.

No conditions adverse to quality were identified during the surveillance.

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

Sincerely,

Martin P. Navarrete
Senior Quality Assurance Specialist

Enclosure

cc: w/enclosure

J. Carswell, CBFO	*ED	R. Maestas, NMED	ED
M. Brown, CBFO	ED	T. Runyon, CTAC	ED
D. Miehl, CBFO	ED	P. Martinez, CTAC	ED
M. Stapleton, CBFO	ED	C. Castillo, CTAC	ED
M. Fineran, CBFO	ED	M. Leroch, CTAC	ED
J. Britain, NWP	ED	B. J. Verret, CTAC	ED
V. Ballew, NWP	ED	P. Gomez, CTAC	ED
S. Saiz, NWP	ED	D. Harvill, CTAC	ED
A. Boyea, NWP	ED	G. White, CTAC	ED
J. Walsh, EPA	ED	WIPP Operating Record	ED
J. Ellis, EPA	ED	CBFO QA File	
T. Peake, EPA	ED	CBFO M&RC	
J. Kieling, NMED	ED	*ED denotes electronic distribution	



CBFO SURVEILLANCE REPORT

Surveillance Number: S-17-13

Date of Surveillance: August 8, 2017

Surveillance Title: Nuclear Waste Partnership LLC Hazardous Waste Transportation Vendors/
RCRA Hazardous Materials Transporter

Organization: Nuclear Waste Partnership LLC (NWP)

Surveillance Team: Martin P. Navarrete Carlsbad Field Office (CBFO) Quality Assurance (QA)
Management Representative
B.J. Verret Surveillance Team Leader, CBFO Technical Assistance
Contractor (CTAC)
Paul Gomez Team Member, CTAC

Purpose:

Surveillance S-17-13 was performed to evaluate transportation activities associated with Waste Isolation Pilot Plant (WIPP)-generated Resource Conservation and Recovery Act (RCRA) hazardous waste, and to evaluate the effectiveness of implementing procedures.

Basis:

Overall program adequacy was evaluated based on the implementation of the following documents:

- 13-QA3012, *Supplier Evaluation/Qualification*
- 02-EC.06, *QA Project Plan for WIPP Site Effluent and Hazardous Material Sampling*
- 02-RC3108, *Request for Disposal*
- 05-WH1036, *Site-Derived Mixed Waste Handling*
- 08-NT3103, *Shipment of Waste*
- 02-RC.01, *Hazardous and Universal Waste Management Plan*

Activities Evaluated:

The following areas were evaluated, as applicable to NWP transportation of hazardous waste:

- Training
- Approved qualified supplier list (QSL) of hazardous waste transportation suppliers/vendors
- Procurement of hazardous waste transportation
- Disposal records (including Hazardous Waste Manifest)
- Transportation of site hazardous waste (cradle to grave)

The surveillance team verified training was current for Transportation Engineers and Site Environmental Compliance personnel.

Vendor QSL Request/Evaluation Update Sheets were examined for the two RCRA/Hazardous Waste Disposal companies and were found to be current and complete. Procurement was verified to be performed per WIPP procedures.

The surveillance team verified data package 17-007, dated 4/11/2017, for a hazardous waste shipment from the WIPP transportation vendors, performed by Veolia of Henderson, Colorado. The team verified that the proper procedures and the attachments were used for shipment. The utilization of WP 02-RC3108, Rev. 16, *Request for Disposal*, the Maintaining of Materials Listing and Disposal Record, and the Request for Disposal (RFD) form were properly filled-in

and filed. The use of the Waste Shipment Checklist from procedure WP 08-NT3103, Rev. 11, *Shipment of Waste*, was verified to be complete. The surveillance team verified these documents provided adequate objective evidence of cradle-to-grave management of the waste by WIPP.

The surveillance team verified that the Transportation Operations file was complete, using the signed and dated Shipment Checklist and the driver instructions. A waste shipment log (Hazardous Waste Manifest 000916418 VES) was also maintained as part of the package. The team also verified the Universal Hazardous Waste Manifest and form EA08NT3103-1-0 with the waste classifications on RFD 17-107 for aerosols, RFD 17-016 for gasoline rags, and RFD 17-089 for mercury vapor bulbs. These attachments were verified by the Transportation Engineer, signed and dated. The team verified that the required 35-day manifest receipt from the shipper was accomplished.

The surveillance team verified RFD Attachment 1, Container Inventory/Activity Logs, for the following: 17-107, 17-016, 17-089, 17-094, 17-095, 17-077, 17-102, 17-090, 17-106, and 17-096 with signatures by the Site Environmental Compliance person and the Radiological Engineer. The latest Materials Listing was verified by the surveillance team in the controlled area where the waste is stored in various containers and segregated containers for safety reasons. It was verified that no additional waste was added and the certified waste was managed in a manner to maintain its certification. All waste containers were properly packaged, marked, and labeled in preparation of waste shipment. Most of the waste was destined for Clive, Utah with Energy Solutions.

The surveillance team verified the environmental group maintains the waste stream profile form and that it is updated for changes. One example of an updated waste stream profile form change was for the air filters collected from Building 413. Initially, they were classified as mixed low-level waste and, following a more recent analysis by a laboratory, are now classified as low-level waste.

The surveillance team inspected satellite accumulation stations for radioactive waste (sump water), hazardous waste (Flammable D018, D001, fuel and water rags, as well as corrosive waste D002 and self-rescuers). Non-hazardous satellite accumulation stations were examined to verify that none of the contents contained either hazardous waste or mixed waste.

Conclusion:

The surveillance team determined that the NWP processes are adequate, satisfactorily implemented, and effective.

Corrective Actions:

No Concerns were identified during the surveillance.

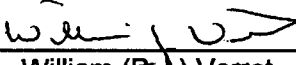
Corrected During the Surveillance:

No items were corrected during the surveillance.

Observations:

No observations were identified during the surveillance.

The surveillance team determined that the applicable requirements for activities performed at the WIPP for transportation and handling of RCRA waste are satisfactorily implemented and effective.

Surveillance Team Leader:  Date: 8/14/17
William (B.) Verret

CBFO QA Representative Approval:  for Date: 8-16-17
Michael Brown