

Allen, Pam, NMENV

From: Biswell, David, NMENV
Sent: Tuesday, January 09, 2018 8:16 AM
To: Allen, Pam, NMENV
Cc: Maestas, Ricardo, NMENV
Subject: FW: S-18-16 Concern Summary 12/7/17
Attachments: S-18-16 Surveillance Concerns Summary.doc



From: Vernon, Jim - CTAC [mailto:Jim.Vernon@wipp.ws]
Sent: Thursday, December 07, 2017 7:51 AM
To: McCoy, John <john.mccoy@icp.doe.gov>; 'Gulbransen, Ed E' <Ed.Gulbransen@icp.doe.gov>; 'Byram, George T' <George.Byram@icp.doe.gov>; Malmo, James - DOE ID <malmoja@id.doe.gov>; 'Pruitt, Douglas M' <pruittdm@id.doe.gov>; Brown, Michael (Mike) - FedNet <mike.brown@cbfo.doe.gov>; Miehl, Dennis - FedNet <dennis.miehl@cbfo.doe.gov>; Navarrete, Martin - FedNet <martin.navarrete@cbfo.doe.gov>; Maestas, Ricardo, NMENV <Ricardo.Maestas@state.nm.us>; Biswell, David, NMENV <David.Biswell@state.nm.us>; Tellez, Hernesto, NMENV <Hernesto.Tellez@state.nm.us>; Martinez, Porf - CTAC <Porf.Martinez@wipp.ws>; Castillo, Cindi - CTAC <Cindi.Castillo@wipp.ws>; Leroch, Matt - CTAC <Matt.Leroch@wipp.ws>; Harvill, Danette - CTAC <Danette.Harvill@wipp.ws>; Fitzgerald, Randy - DOE/CTAC <Randy.Fitzgerald@wipp.ws>; Chavez, Ricardo - CTAC <Ricardo.Chavez@wipp.ws>; Yanez, Prissy - CTAC <prissy.yanez@wipp.ws>; 'James Vernon (jvernon@portageinc.com)' <jvernon@portageinc.com>; Blauvelt, Richard <dblauvelt@portageinc.com>
Subject: S-18-16 Concern Summary 12/7/17

All,

Here is the concern summary for surveillance S-18-16 for 12/7/17. We will have a management briefing this morning at 8:30am. The call-in number is 877-931-8141, PC 5946164

Thanks,

Jim Vernon
CTAC



Surveillance S-18-16, December 4-7, 2017
Summary of Concerns

No.	Who	Description of Concern	Requirements Comments
1	Chavez	<p>The BNINW216 containers stored in the Waste Handling Building were generated during a specific time period (12/5/1969 to 10/21/1977 and one each on 11/30/1980 and 9/3/1981); however there are several historic Rocky Flats Waste Management documents referenced in the AKA CCN 321344 (P2599A) which weren't effective until after this time period. Without further explanation within the AKA these historic documents do not appear to be applicable to this waste stream inventory.</p> <p>This same concern can be applied to the AKA CCN 321216 (C1639A) for BNINW216 Lot 1 containers at INL.</p>	<p>MCP-4010, <i>Collection, Review, and Management of Acceptable Knowledge Documentation</i>, Revision 2, Section 4.11.6 states "Document the AKA in an Acceptable Knowledge Assessment Memorandum that includes the following, as applicable to the waste stream inventory...Historic waste management practices."</p>
2	Fitzgerald	<p>The CCEM for Waste Stream BNINW216, <i>Attachment 3, EPA Hazardous Waste Compatibility Chart for Waste Stream BNINW216</i> does NOT include the reaction codes GF, H for the Reactivity Group Number, RGN combination for 10 Caustics and 23 Metals, Other Elemental and Alloys as Sheets, Rods, Drops, Moldings, etc. <i>Attachment 2, Waste Stream BNINW216 Reactivity Group Number Compatibility Evaluation</i> addresses RGN 10, Caustics and RGN 23, Metals, Other Elemental and Alloys as Sheets, Rods, Drops, Moldings, etc., and the associated reaction codes GF, H.</p>	<p>MCP-4015 <i>Preparation of Chemical Compatibility Evaluation and Basis of Knowledge Assessment</i>, Revision 2 section 4.1.15[F] states "RGN Assignments in Attachment 1 are consistent with Attachments 2 and 3."</p>
3	Vernon/Fitzgerald	<p>In review of the AMWTP procedures associated with the implementation of the Enhanced AK process, the surveillance team noted several weaknesses in the reviewed procedures. These weaknesses involve areas where work was demonstrated to the surveillance team that was not described in the associated procedure. Examples include the following:</p> <ul style="list-style-type: none"> - MCP-4010 <i>Collection, Review, and Management of Acceptable Knowledge Documentation</i> section 4.6 describes AK Briefings. The entire section describes the required elements of the AK briefing, yet the section is a note rather than procedure steps. - MCP-4015 <i>Preparation of Chemical Compatibility Evaluation and Basis of Knowledge Assessment</i>, section 4.1.20.1 describes the revision of the Chemical Compatibility Evaluation, CCE if necessary yet when the CCE is revised there is no revision history associated with the CCE. 	<p>DOE/CBFO-94-1012 Rev. 13 <i>Quality Assurance Program Document</i>, Section 1.4.1[A] states "Documents shall be reviewed for adequacy, correctness, and completeness prior to approval and use."</p>

The information contained on this form is preliminary.

**Surveillance S-18-16, December 4-7, 2017
Summary of Concerns**

No.	Who	Description of Concern	Requirements Comments
4	Vernon	In review of the AMWTP procedure associated with the implementation of the Enhanced AK process, the surveillance team noted that training on the Enhanced AK process in the Waste Data System, WDS was not provided. AMWTP developed the Enhanced AK procedure to include WDS data entry based on DOE/WIPP-09-3427 Waste Data System User's Manual. DOE/WIPP-09-3427 does not describe the required input of Enhanced AK data into WDS including data validation and verification as well as the number of independent reviewers.	DOE/CBFO-94-1012 Rev. 13 <i>Quality Assurance Program Document</i> , Section 6.10.2.6 states "User documentation shall be sufficient to allow any qualified user (i.e. one having adequate technical background) to install and run the software and properly respond to errors. User documentation, at a minimum, shall include [E] A description of any required training necessary to use the software."

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