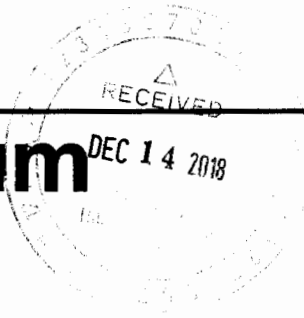


United States Government

Department of Energy

memorandum

 Carlsbad Field Office
 Carlsbad, New Mexico 88221


DATE: DEC 14 2017
 REPLY TO
 ATTN OF: CBFO:OQA:MRB:BA:17-2299:UFC 2300.00

SUBJECT: CBFO Surveillance Report S-18-18 of the NWP/CCP Management Assessment of the Remediation of Nitrate Salts Waste at the LANL Waste Characterization, Reduction, and Repackaging Facility

TO: Mr. Douglas E. Hintze, EM-LA

A surveillance team from the Carlsbad Field Office (CBFO) conducted Surveillance S-18-18 of the Nuclear Waste Partnership LLC Central Characterization Program Management (NWP/CCP) Assessment of the Remediation of Nitrate Salts Waste at the Los Alamos National Laboratory (LANL) Waste Characterization, Reduction, and Repackaging Facility. The surveillance was conducted October 11 – 12, 2017, in Los Alamos, NM. The team concluded that the implementation and effectiveness of the management assessment process is adequate and compliant with applicable requirements.

The surveillance team identified no conditions adverse to quality, Observations, or Recommendations during the surveillance. The surveillance report is attached.

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



Dennis S. Miehl
 Senior Quality Assurance Specialist

Attachment

cc: w/attachment

R. Murray, EM-3.113	* ED	J. Walsh, EPA	ED
T. Shrader, CBFO	ED	J. Ellis, EPA	ED
J. Carswell, CBFO	ED	T. Peake, EPA	ED
J.R. Stroble, CBFO	ED	E. Feltcorn, EPA	ED
M. Brown, CBFO	ED	R. Joglekar, EPA	ED
M. Navarrete, CBFO	ED	J. Kieling, NMED	ED
M. Fineran, CBFO	ED	R. Maestas, NMED	ED
M. Stapleton, CBFO	ED	D. Biswell, NMED	ED
N. Castaneda, CBFO	ED	H. Tellez, NMED	ED
G. Birge, CBFO	ED	T. Runyon, CTAC	ED
D. Nickless, EM-LA	ED	P. Martinez, CTAC	ED
J. Britain, NWP	ED	C. Castillo, CTAC	ED
M. Percy, NWP	ED	M. Leroch, CTAC	ED
R. Lee, NWP	ED	R. Castillo, CTAC	ED
B. Pace, NWP	ED	D. Harvill, CTAC	ED
T. Groover, NWP	ED	G. White, CTAC	ED
J. Carter, NWP	ED	CBFO QA File	
A.J. Fisher, S1C	FD	CBFO M&RC	

*ED denotes electronic distribution

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CBFO SURVEILLANCE REPORT

Surveillance Number: S-18-18 **Date of Surveillance:** Oct. 11 – 12, 2017

Surveillance Title: NWP/CCP Management Assessment of the RNS at the LANL WCRRF Surveillance

Organization: Carlsbad Field Office (CBFO)

Surveillance Team: Dennis S. Miehl CBFO Office of Quality Assurance (OQA)
Management Representative
Rick Castillo Surveillance Team Leader, CBFO Technical
Assistance Contractor (CTAC)

SURVEILLANCE SCOPE:

Surveillance S-18-18 was conducted to verify the implementation and effectiveness of the Nuclear Waste Partnership LLC (NWP) Central Characterization Program (CCP) management assessment of the remediation of nitrate salts (RNS) at the Los Alamos National Laboratory (LANL) Waste Characterization, Reduction, and Repackaging Facility (WCRRF), with respect to the requirements of the current CBFO Quality Assurance Program Document.

SURVEILLANCE RESULTS:

The surveillance team conducted interviews with responsible personnel and evaluated the management assessment process conducted internally by NWP, including documentation of issues and resolution identified during the management assessment. The team also examined documents and records generated, completed, and maintained as a result of the management assessment process of the RNS campaign to determine the degree to which the management assessment requirements are implemented and the effectiveness of the overall process.

The surveillance areas are described below. No concerns were identified during this surveillance. The surveillance team concluded that the management assessment process, related to the RNS campaign performed at the LANL WCRRF, is satisfactorily established for compliance with applicable upper-tier requirements, implementation is acceptable, and it is effective in achieving the desired results.

ACTIVITIES EVALUATED:

Evaluations of the management assessment process of the RNS campaign by NWP/CCP at the LANL WCRRF, including resolution and documentation of issues identified by NWP/CCP, to ensure that effective measures are implemented to manage the issues and

to promote continuous improvement within the CBFO included, but were not limited to, the following:

- Corrective action process resulting from issues identified during the management assessment
- Records generated, completed, and maintained as a result of the management assessment process
- Training documentation

Corrective Action Process

The surveillance team reviewed documentation and interviewed responsible personnel regarding the review of the RNS campaign process and concluded there were no deficiencies or other conditions requiring resolution identified during the management assessment. Additionally, the surveillance team determined the procedure reviewed and the objective evidence evaluated for the corrective action process provided evidence to confirm that the corrective action process is adequately established for compliance with upper-tier requirements, satisfactorily implemented, and effective in achieving the desired results. No concerns were identified during the surveillance.

Management Assessment Records and Training Documentation

The surveillance team requested records documentation related to NWP/CCP's management assessment (MA-CCP-0012-17) of the RNS campaign at the LANL WCRRF. The surveillance team's reviews of documents and records included, but were not limited to, the following:

- Management Assessment Schedule
- Management Assessment Notifications
- Management Assessment Plan
- Management Assessment Log
- Management Assessment Observations of LANL RNS Treatment Process
- Management Assessment Report

Results of the review of the associated documents and records indicate that they adequately address upper-tier requirements and are maintained as required.

The surveillance team also reviewed the procedure for applicable training requirements associated with conducting a management assessment and determined there were no specific training requirements in the procedure for personnel performing a management assessment. However, the surveillance team determined that NWP/CCP performs management assessment briefings (MA-101 and MA-102), as needed, to associated personnel performing management assessments (see Recommendation 1). The surveillance team also determined through review of objective evidence that the

management assessment records are being properly maintained in compliance with upper-tier requirements.

RNS Campaign at LANL WCCRF Process Overview

The surveillance team was able to attend a Plan of the Day meeting on October 12, 2017, which reviewed a list of that day's events. The team observed the RNS process on October 12, 2017, at the WCCRF at LANL for container #69015. During observations of the RNS process, it was confirmed CCP log entries are recorded into the logbook CCP-CH-LANL-RNS-TA54 each work day. Through a review of the CCP logbook, the team confirmed the RNS personnel are working to current procedures at the beginning of each shift, and maintain the logbook per procedural requirements. The surveillance team also reviewed completed and in-process LANL QA log sheets. During the surveillance team's observations, it was verified that CCP is observing RNS operations, and is communicating with LANL personnel effectively. There is a good coordinated interface among the LANL and LANL/CCP personnel related to logbook entries by both LANL/CCP and LANL QA programs, LANL Waste Compliance and Tracking System (WCATS) data input, and general RNS work being performed by LANL personnel. LANL personnel performing RNS work are separating the waste by the S3000 and S5000 waste streams. The LANL personnel are mixing in Zeolite with the RNS waste (S3000) to treat the waste prior to placing it into the output container. The surveillance team observed the RNS process performed on parent container #69015, where S5000/debris waste was placed into output container #70123 and S3000/RNS treated waste was placed into output container #70116. This RNS process was confirmed to be logged into the logbook for daily operations by both LANL and LANL/CCP.

Overall, the surveillance team determined that the procedure reviewed and objective evidence assembled and evaluated during the surveillance provided evidence that the applicable requirements for the management assessment process for the LANL RNS campaign at the LANL WCCRF activities are adequately established for compliance with upper-tier requirements, satisfactory in the implementation of these requirements, and effective in achieving the desired results.

CORRECTIVE ACTIONS:

Corrective Action Reports:

No conditions adverse to quality (CAQs) were identified during the surveillance.

Corrected During the Surveillance:

No CAQs were corrected during the surveillance.

Observations

No Observations were identified during the surveillance.

Recommendations:

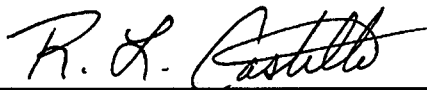
One Recommendation was offered to management for consideration.

Recommendation 1

It is recommended that NWP/CCP includes language in procedure CCP-QP-018, *CCP Management Assessment*, to identify the briefings/training associated with management assessments currently given to CCP personnel.

SURVEILLANCE CONCLUSION:

The surveillance team concluded that the management assessment process, related to the RNS campaign performed at the LANL WCRRF, is satisfactorily established for compliance with applicable upper-tier requirements, implementation is acceptable, and it is effective in achieving the desired results.

Surveillance Team Leader:  Date: 12/14/17
Rick L. Castillo, CTAC
Surveillance Team Leader

CBFO OQA Approval:  Date: 12-14-17
Dennis S. Miehl, CBFO
Senior Quality Assurance Specialist