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

SEP 18 2018

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

Subject: Carlsbad Field Office Report for Audit A-18-24, NWP QA Program NQA-1 Criteria 10 through 18

Dear Ms. McDaniel:

The Carlsbad Field Office (CBFO) performed Audit A-18-24 of the Nuclear Waste Partnership LLC (NWP) Quality Assurance (QA) Program related to Criteria 10 through 18 of the *Quality Assurance Program Requirements for Nuclear Facilities* (ASME NQA-1, 1989 Edition), and the corresponding sections of the *CBFO Quality Assurance Program Document (QAPD)* on July 31 through August 2, 2018. The audit team concluded that the NWP QA Program continues to adequately address the upper-tier requirements of the *CBFO Quality Assurance Program Document*; the implementation of NWP procedures continues to be satisfactory; and procedure implementation results in an effective program overall.

As described in the enclosed report, the audit team identified three concerns resulting in one Corrective Action Report, one recommendation, and one condition corrected during the audit.

If you have any questions concerning the audit report, please contact me at (575) 234-7483.

Sincerely,

Martin P. Navarrete
Senior Quality Assurance Specialist

Enclosure

cc: w/enclosure

J. Carswell, CBFO	*ED	J. Kieling, NMED	ED
D. Gadbury, CBFO	ED	R. Maestas, NMED	ED
D. Miehls, CBFO	ED	D. Biswell, NMED	ED
S. Stapleton, CBFO	ED	H. Tellez, NMED	ED
E. Garza, CBFO	ED	M. McLean, NMED	ED
B. Covert, NWP	ED	T. Runyon, CTAC	ED
D. Huddleston, NWP	ED	P. Martinez, CTAC	ED
S. Turner, NWP	ED	M. Leroch, CTAC	ED
C. Tyler, NWP	ED	C. Castillo, CTAC	ED
V. Ballew, NWP	ED	J. Schuetz, CTAC	ED
S. Saiz, NWP	ED	D. Harvill, CTAC	ED
A. Boyea, NWP	ED	G. White, CTAC	ED
J. Walsh, EPA	ED	CBFO QA File	
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CBFO:OQA:MPN:JM:18-2018:UFC 2300.00

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U.S. DEPARTMENT OF ENERGY
CARLSBAD FIELD OFFICE

AUDIT REPORT

OF

AUDIT NUMBER A-18-24

July 31 – August 2, 2018

NUCLEAR WASTE PARTNERSHIP LLC
QUALITY ASSURANCE PROGRAM
NQA-1-1989 Criteria 10 through 18

CARLSBAD, NEW MEXICO

Prepared by: _____ **Date:** 9-11-18

James Schuetz, CTAC
Audit Team Leader

Approved by: _____ **Date:** 9-18-18

Donald C. Gadbury, CBFO
Quality Assurance Director

9-18-18

1.0 EXECUTIVE SUMMARY

The Carlsbad Field Office (CBFO) conducted Audit A-18-24 from July 31 through August 2, 2018, to evaluate the adequacy, implementation, and effectiveness of quality assurance (QA) and technical activities related to the Nuclear Waste Partnership LLC (NWP) Quality Assurance Program at the Waste Isolation Pilot Plant (WIPP). Activities were evaluated with respect to the requirements defined in DOE/CBFO-94-1012, Rev. 13, *CBFO Quality Assurance Program Document* (QAPD); WP 13-1, Rev. 38, *NWP Quality Assurance Program Description;* and NWP implementing procedures.

The audit team concluded that, overall, the NWP QA Program, as related to Criteria 10 through 18 of the American Society of Mechanical Engineers NQA-1-1989 Edition, *Quality Assurance Program Requirements for Nuclear Facilities* (NQA-1-1989), was adequately established for compliance with upper-tier requirements, satisfactory in the implementation of those requirements, and effective in achieving the desired results. This report encompasses the NQA-1 criteria that were evaluated during the audit and the criteria that were separated from the audit scope as these were deferred to another assessment or were addressed in previous recent assessment activities.

The audit team identified one condition adverse to quality (CAQ) related to attention to detail by records generators in preparation of QA records, which resulted in the issuance of the CBFO Corrective Action Report (CAR) 18-047 (see Section 6.1).

One isolated CAQ was corrected during the audit (CDA), no Observations were documented, and one Recommendation for improvement was offered to NWP management (see Section 7.0).

2.0 SCOPE

The audit evaluated the adequacy, implementation, and effectiveness of the NWP QA Program related to NQA-1-1989 Criteria 10 through 18, and the corresponding sections of the CBFO QAPD.

NQA-1 criteria 15 through 18 were evaluated by conducting procedure review for adequacy of flow-down of requirements, conducting interviews with NWP personnel who performed procedure implementation, and reviewing objective evidence of documentation of implementation. NQA-1 criteria 10 through 14 were evaluated by review of recently conducted assessments that covered these criteria. The review of previous assessments with respect to status of the current programs and compliance with requirements is included in this audit report.

NWP procedures related to NQA-1 criteria 15 through 18 were evaluated for adequacy based on the CBFO QAPD, Rev. 13.

3.0 AUDIT TEAM

Martin Navarrete	QA Management Representative, CBFO
Micheal Stapleton	CBFO Quality Assurance Specialist
Jim Schuetz	Audit Team Leader, CBFO Technical Assistance Contractor (CTAC)
Charlie Riggs	Auditor, CTAC
Kathy Hood	Auditor, CTAC

4.0 AUDIT PARTICIPANTS

Individuals contacted during the audit are identified in Attachment 1. A pre-audit conference was held in the NWP Support Building large conference room on July 31, 2018. The audit was concluded with a post-audit conference in the NWP Support Building small conference room on August 2, 2018.

5.0 SUMMARY OF AUDIT RESULTS

5.1 Program Adequacy, Implementation, and Effectiveness

To determine overall effectiveness of the NWP QA Program regarding NQA-1-1989 Criteria 10 through 14, the audit team evaluated reports of previously performed assessments that covered and addressed these criteria to determine current status of the NWP QA Program and to verify that the NWP QA Program has been adequately assessed and is compliant regarding the individual NQA-1 criteria.

To determine overall effectiveness of the NWP QA Program regarding NQA-1-1989 Criteria 15 through 18, the audit team evaluated the associated implementing procedures to verify the adequate flow-down of upper-tier requirements, conducted interviews with responsible personnel, examined records storage locations, and reviewed randomly selected records to determine the degree to which the NWP QA Program addresses the NQA-1 criteria and performs procedure implementation. The results of the evaluations, interviews, and document reviews are described in detail below.

Two CAQs were identified during the audit, one being isolated in nature that was CDA and the other resulting in the issuance of a CAR. One Recommendation was identified. These items are described in sections 6.0 and 7.0 of this report. Except as noted, the NWP QA Program for NQA-1-1989 Criteria 10 through 18 was determined to be adequately established for compliance with upper-tier requirements, satisfactory in the implementation of those requirements, and effective in achieving the desired results.

5.2 Quality Assurance Program Audit Details

The audit addressed compliance of the NWP QA Program and implementing procedures with NQA-1-1989 Criteria 10 through 18. CBFO assessment reports

covering and addressing NQA-1-1989 Criteria 10 through 14 were identified and are listed in Attachments 3, 4, and 5. NWP implementing procedures related to NQA-1-1989 Criteria 15 through 18 were selected for this audit and are identified in Attachment 2. Each criterion is discussed in detail in the paragraphs below.

Criterion 10 – Inspection

NQA-1-1989, Criterion 10, *Inspection,* was separated from the scope of this assessment as this subject was covered in the scope of a previous CBFO assessment of the NWP QA Program. Attachment 3 provides details of the NWP QA Program related assessment A-18-22 conducted by the CBFO. The audit team reviewed the report for that assessment and determined that the evaluation stated in the content of the report demonstrates that the current status of the NWP Inspection Program is compliant with NQA-1 Criterion 10 requirements. The audit team determined that the NWP inspection procedures are adequately established for compliance with upper-tier requirements, satisfactorily implemented, and effective in achieving the desired results.

Criterion 11 – Test Control

NQA-1-1989, Criterion 11, *Test Control,* was separated from the scope of this assessment as this subject was covered in the scope of a previous CBFO assessment of the NWP Material Control and Stores Inventory Program. Attachment 4 provides details of the test control related assessment A-17-32 conducted by the CBFO. The audit team reviewed the report for that assessment and determined that the evaluation stated in the content of the report demonstrates that the current status of the NWP Test Control Program is compliant with NQA-1 Criterion 11 requirements. The audit team determined that the NWP test control procedures are adequately established for compliance with upper-tier requirements, satisfactorily implemented, and effective in achieving the desired results.

Criterion 12 – Control of Measuring and Test Equipment

NQA-1-1989, Criterion 12, *Control of Measuring and Test Equipment,* was separated from the scope of this assessment as this subject was covered in the scope of two previous CBFO assessments of the NWP Waste Handling Operations and Calibration Programs. Attachment 5 provides details of the measurement and test equipment control related assessments A-17-11 and A-17-15 conducted by the CBFO. The audit team reviewed the reports for these assessments and determined that the aggregate of the evaluations stated in the content of the reports demonstrates that the current status of the NWP Measurement and Test Equipment Control Program is compliant with NQA-1 Criterion 12 requirements. The audit team determined that the NWP measurement and test equipment control procedures are adequately established for compliance with upper-tier requirements, satisfactorily implemented, and effective in achieving the desired results.

Criterion 13 – Handling, Shipping, and Storage

NQA-1-1989, Criterion 13, *Handling, Shipping, and Storage,* was separated from the scope of this assessment as this subject was covered in the scope of a previous CBFO assessment of the NWP Material Control and Stores Inventory Program. Attachment 4 provides details of the handling shipping and storage related assessment A-17-32 conducted by the CBFO. The audit team reviewed the report for that assessment and determined that the evaluation stated in the content of the report demonstrates that the current status of the NWP Handling, Shipping, and Storage Program is compliant with NQA-1 Criterion 13 requirements. The audit team determined that the NWP handling shipping and storage procedures are adequately established for compliance with upper-tier requirements, satisfactorily implemented, and effective in achieving the desired results.

Criterion 14 – Inspection, Test and Operating Status

NQA-1-1989, Criterion 14, *Inspection, Test and Operating Status,* was separated from the scope of this assessment as this subject was covered in the scope of a previous CBFO assessment of the NWP QA Program. Attachment 3 provides details of the QA Program related assessment A-18-22 conducted by the CBFO. The audit team reviewed the report for that assessment and determined that the evaluation stated in the content of the report demonstrates that the current status of the NWP Inspection, Test, and Operating Status Program is compliant with NQA-1 Criterion 14 requirements. The audit team determined that the NWP inspection, test, and operating status procedures are adequately established for compliance with upper-tier requirements, satisfactorily implemented, and effective in achieving the desired results.

Criterion 15 – Control of Nonconforming Items

The audit team evaluated the control of nonconforming items in accordance with NWP procedure WP13-QA3004, *Nonconformance Report.*

The audit team interviewed the Nonconformance Report (NCR) Coordinator, reviewed the NCR Log, and randomly selected NCRs that were generated during performance of various NWP activities. The audit team selected the following NCRs for evaluation; FY2018-07, FY 2018-06, FY 2018-05, FY 18-003, FY 2018-02, and FY 2017-78. The audit team confirmed that deficiencies are properly evaluated and screened for Price-Anderson Amendments Act (PAAA), National Transportation Safety Board (NTSB) and U.S. Nuclear Regulatory Commission reportability, as well as the proper unreviewed safety question (USQ) evaluations. The audit team determined that Hold Tags are being placed and removed in accordance with the procedure. The audit team also verified that NCRs and deficiencies are entered into the Commitment Tracking System (CTS) for tracking and resolution. The audit team verified that NCRs are properly closed and NCR records are retained by NWP QA. The record packages were complete and properly maintained.

The audit team identified one recommendation for management consideration. During the evaluation of procedures for adequacy and review of recent procedure changes, the audit team identified that the NWP nonconformance implementing procedure does not provide clear direction to users in deciding when to implement either an NCR Hold Tag and/or a QA Hold Tag, and recommends that the procedure be revised. This concern is expressed as a recommendation noting that WP 13-QA3004 is currently under revision to address concerns in CBFO CAR 18-040 from CBFO Audit A-18-22, and understanding that the content of this recommendation will be included therein.

Accounting for the nature of the recommendation, the audit team concluded that the NWP nonconformance reporting program is adequately established for compliance with upper-tier requirements of NQA-1 Criterion 15, *Control of Nonconforming Items*, satisfactorily implemented, and effective in achieving the desired results.

Criterion 16 – Corrective Action

The audit team evaluated the NWP corrective action processes that are performed in accordance with the following NWP procedure, charter, and policy.

- WP 15-GM1002, *Issues Management Processing of WIPP Forms*
- MC 1.7, NWP Management Charter, *WIPP Form Screening Committee*
- MP 1.41, NWP Management Policy, *Issues Management "WIPP Form"*

The audit team verified that the WIPP Form process and the issuance of NCRs compliment the corrective action process. The audit team verified that WIPP Forms are used to identify nonconformances discovered while conducting NWP operations, and that each WIPP Form is screened by a committee that has QA representation. The audit team interviewed the WIPP Form Coordinator and randomly selected WIPP Forms for evaluation. The audit team selected the following WIPP Forms for evaluation: WF18-197, WF18-209, WF16-1888, WF18-335, WF17-245, WF17-547, and WF18-348. The audit team verified that the WIPP Forms required the development of corrective action plans, ensuring the resolution and closure of issues. In addition, the audit team verified that the screening process ensures the appropriate evaluations relative to determination of PAAA, NTSB reportability, Occurrence Reporting and Processing System reportability, New Mexico Environment Department reportability, and classification of significant CAQs. The audit team verified that all WIPP Forms and the associated issues are entered into the electronic CTS for tracking, resolution, and closure. The audit team verified that WIPP Forms are properly closed and the WIPP Form files were complete and properly maintained. The audit team determined that WIPP Forms are trended and reported to all of the appropriate entities on a semiannual trend report. No concerns related to the NWP corrective action program were identified.

The audit team concluded that the NWP corrective action program is adequately established for compliance with upper-tier requirements of NQA-1 Criterion 16, *Corrective Action*, satisfactorily implemented, and effective in achieving the desired results.

Criteria 17 – Quality Assurance Records

The audit team evaluated the QA records generation and management processes that are performed in accordance with the following NWP procedures.

- WP 15-RM, *WIPP Records Management Program*
- WP 15-RM3002, *Records Filing, Inventorying, Scheduling, and Dispositioning*
- WP 15-RM3003, *Disposal of Nonpermanent Records in Office*
- WP 15-RM3005, *Records Transfer and Retrieval*

The audit team determined that the NWP implementing procedures adequately address upper-tier requirements.

The audit team evaluated the NWP Records Program through interviewing the assigned records coordinator for the NWP Quality Assurance and Contractor Assurance departments and by reviewing objective evidence of records processing, maintenance, and control, including samples of active QA records from both departments. The audit team verified that each department has an approved Records Inventory and Disposition Schedule (RIDS) that is revised annually. Records that were reviewed were determined to be legible, reproducible, and adequately protected to minimize risk of loss or damage.

The audit team verified that the office Records Coordinator has been trained to develop and maintain the QA RIDS. A review of a sample of recently completed Records Inventory Worksheet forms indicated that records are adequately collected and detailed for inclusion on, or for removal from, the next RIDS release version.

The audit team verified that QA records were properly validated and that access to the records is controlled. A list of personnel permitted access to the NWP QA department records was posted at the lockbox storing keys to the locked, fire-rated file cabinets. However, the audit team noticed that there was not a similar posted list for Contractor Assurance department records, which are stored separate from the QA department records.

The audit team verified that controls for transfer and receipt of QA records are established and effective. Inactive records are being transferred to the WIPP Records Archive (WRA) and a Records Transmittal and Index accompanies each transfer, as required. Additionally, the audit team verified through review of sample records destruction concurrence letters that nonpermanent records are disposed of in accordance with National Archives and Records Administration regulations and as required by the RIDS.

During review of QA records, the audit team identified two concerns. The first concern related to numerous instances of inattention to detail and incomplete formatting in QA records documents on the part of records generators. This concern was determined to be a CAQ and resulted in the issuance of CBFO Corrective Action Report (CAR) 18-047 for departure from requirements in procedure WP 15-RM, section 32, which states that

records generators will "ensure documents designated to become records are completed appropriate to work accomplished." (See CAR 18-047 in section 6.1.) The second concern related to the absence of a posted list of personnel who are permitted access to the Contractor Assurance QA records cabinet. The audit team determined that this was an isolated CAQ and verified that a list was generated and properly posted. The audit team verified that the concern was corrected during the audit. (See CDA #1 in section 6.2.)

The audit team toured the WRA facility and interviewed personnel concerning processing transferred QA records as well as controls implemented for their storage, protection, and retrieval. The audit team determined that the processes at the WRA are effective and comply with NQA-1 requirements for the preservation and maintenance of QA records.

Accounting for the nature of the two CAQs, the audit team concluded that the NWP Records Program is adequately established for compliance with upper-tier requirements of NQA-1 Criterion 17, *Quality Assurance Records*, satisfactorily implemented, and effective in achieving the desired results.

Criteria 18 – Audits

The audit team evaluated the audit processes in accordance with NWP procedures WP 13-QA.03, Rev. 13, *Quality Assurance Independent Assessment Program*. NWP performs several types of independent assessments (internal audits, external audits, and surveillances). The audit team determined that the NWP implementing procedures adequately addresses upper-tier requirements.

The audit team verified that the QA Manager develops and maintains an assessment schedule that identifies the appropriate internal and external assessments. The audit team verified that the QA department maintains an assessment log that identifies internal and external assessments and surveillances and provides the current status of the assessments listed. The audit team interviewed the Assessment Coordinator and randomly selected completed assessments from the assessment log that were evaluated as objective evidence of implementation. The audit team verified that the assessment plans and the assessment reports for the selected assessments were in compliance with procedures. The audit team verified that assessment findings were properly documented. The audit team verified that assessment findings are entered into the electronic CTS for tracking status and closure. The audit team verified that the assigned assessment team leaders for the selected assessments were qualified. The audit team reviewed the closure documentation and records packages associated with the selected assessments and determined the packages were complete and properly maintained.

The audit team noted that NWP was not consistently issuing assessment reports within the 45 calendar days after completion of the assessment as required by procedure. Further evaluation demonstrated that this condition had been self-identified by NWP in

June 2018, and addressed on a WIPP Form that is still outstanding. No other concerns were identified by the audit team.

The audit team concluded that the NWP assessment program is adequately established for compliance with upper-tier requirements of NQA-1 Criterion 18, *Audits*, satisfactorily implemented, and effective in achieving the desired results.

6.0 SUMMARY OF DEFICIENCIES

6.1 Corrective Action Reports

During the audit, the audit team may identify conditions adverse to quality (CAQs) as defined below, and document such conditions for resolution using CBFO Corrective Action Reports (CARs).

> **Condition Adverse to Quality (CAQ)** – Term used in reference to failures, malfunctions, deficiencies, defective items, and nonconformances.
>
> **Significant Condition Adverse to Quality** – A condition which, if uncorrected, could have a serious effect on safety, operability, waste confinement, TRU waste site certification, compliance demonstration, or the effective implementation of the QA program.

One CAR, described below, was initiated as a result of this audit. The CAR was transmitted to NWP under separate cover.

CBFO CAR 18-047

Numerous instances of records demonstrating inattention to detail and incomplete formatting by records originators including, but not limited to:

- Form EA15PC3044-2-0, Q-Credit Card Master Inspection Plan form, dated 6/11/2018 – form missing form number, revision number, and page numbers
- Form EA16-2-1-0, Software Screening Checklist form – forms completed inconsistent with procedure instructions
- RCAR-2017-006, WIPP Form 17-1201 Root Cause Analysis Report – missing Attachment 1-Charter, as page 17 of 18 of the report
- MSA-RAD-2018-002, Radiological Control & Dosimetry Management Self-Assessment Report – Originator name not printed and signature indiscernible; Management Self-Assessment Checklist and Evaluation Form incomplete
- CA-IVR-2018-001, IVR ESS Assessment – Attachment 2 not labeled as such
- MSA-OPS-2018-029, Procedure Adherence Management Assessment Report – no page numbers; Assessment Leader name not printed and signature indiscernible; attachments to report are missing pages

- MSA-BUS-2018-001, Effectiveness Review of Work Breakdown Structure Corrective Action – Management Self-Assessment Checklist and Evaluation Form incomplete
- Form EA15PC3041-2-0, Approval/Variation Request (AR/VR) for PO/Subcontract No. 504990-030, AR/VR No. 007-011 (Supplier: Stellar Inc.) – two checkboxes not completed on the form

NWP Procedure WP 15-RM, Rev. 10, *WIPP Records Management Program*, section 3.2 Completeness, states that records generators will "ensure documents designated to become records are completed appropriate to work accomplished."

6.2 Deficiencies Corrected During the Audit (CDAs)

> **Corrected During the Audit (CDA)** – Isolated deficiencies that do not require a root cause determination or actions to preclude recurrence, and where correction of the deficiency can be verified prior to the end of the audit.

During the audit, the audit team may identify CAQs. The audit team members and the Audit Team Leader (ATL) evaluate the CAQs to determine if they are significant. Once a determination is made that the CAQ is not significant, the audit team member, in conjunction with the ATL, determines if the CAQ is an isolated case requiring only remedial action and, therefore, can qualify as being CDA. Deficiencies that can be classified as CDA are those isolated deficiencies that do not require a root cause determination or actions to preclude recurrence, and those for which correction of the deficiency can be verified prior to the end of the audit. Examples include one or two minor changes required to correct a procedure (isolated), one or two forms not signed or not dated (isolated), or one or two individuals have not completed a reading assignment.

Upon determination that the CAQ is isolated, the audit team member, in conjunction with the ATL, evaluates/verifies any objective evidence/actions submitted or taken by the audited organization and determines if the condition was corrected in an acceptable manner. Once it has been determined that the CAQ has been corrected, the ATL categorizes the condition as CDA.

One CAQ was identified and corrected during this audit, as described below.

CDA 1

Condition:

The list of personnel who are permitted access to the Contractor Assurance QA records cabinet is not posted.

Requirement:

WP 15-RM, Rev. 10, *WIPP Records Management Program,* Section 7.5 Storage, Maintenance and Protection of QA Records, states "Unauthorized access to QA records in active storage will be prevented by ...Generating, posting, and maintaining a list designating personnel permitted access to QA records."

Resolution:

A list of personnel who are permitted access to the Contractor Assurance QA records cabinet was generated and posted at the proper location on Aug. 1, 2018. The corrected list was reviewed by the audit team and the location of the posted list was verified prior to the close-out of the audit on August 2, 2018.

7.0 SUMMARY OF OBSERVATIONS AND RECOMMENDATIONS

During the audit, the audit team may identify conditions that warrant input by the audit team to the audited organization regarding potential problems or suggestions for program improvement.

7.1 Observations

During the audit, the audit team may identify potential problems that should be communicated to the audited organization. The audit team members, in conjunction with the ATL, evaluate these conditions and classify them as Observations using the following definition:

> **Observation** – A condition that, if not controlled, could result in a CAQ.

Once a determination is made, the audit team member, in conjunction with the ATL, categorizes the condition appropriately.

No Observations were identified during the audit.

7.2 Recommendations

During the audit, the audit team may identify suggestions for improvement that should be communicated to the audited organization. The audit team members, in conjunction with the ATL, evaluate these conditions and classify them as Recommendations using the following definition:

> **Recommendations** – Suggestions that are directed toward identifying opportunities for improvement and enhancing methods of implementing requirements.

Once a determination is made, the audit team member, in conjunction with the ATL, categorizes the condition appropriately.

Recommendation 1

During the evaluation of procedures for adequacy and review of recent procedure changes, the audit team identified that the NWP procedure WP 13-QA3004, *Nonconformance Report*, does not provide clear direction to users in deciding when to implement either an NCR Hold Tag and/or a QA Hold Tag. The audit team recommends that section 8.0 of procedure WP 13-QA3004 be revised to better clarify direction for using either an NCR Hold Tag and/or a QA Hold Tag. This concern is expressed as a recommendation noting that WP 13-QA3004 is currently under revision to address concerns in CBFO CAR 18-040 from CBFO Audit A-18-22, and understanding that the content of this recommendation can be included therein.

8.0 LIST OF ATTACHMENTS

Attachment 1: Personnel Contacted During the Audit – A-18-24
Attachment 2: NWP Implementing Procedures Evaluated – A-18-24
Attachment 3: List of the (ASME Criterion 10) *Inspection* and (ASME Criterion 14) *Inspection, Test, and Operating Status* based assessment of the NWP program
Attachment 4: List of the (ASME Criterion 11) *Test Control* and (ASME Criterion 13) *Handling, Storage, and Shipping* based assessment of the NWP program
Attachment 5: List of the two (ASME Criterion 12) *Control of Measuring and Test Equipment* based assessments of the NWP program

PERSONNEL CONTACTED DURING THE AUDIT – A-18-24				
NAME	**ORGANIZATION / DEPARTMENT**	**PRE-AUDIT MEETING**	**CONTACTED DURING AUDIT**	**POST-AUDIT MEETING**
Donny Baker	WRMS Iron Mountain / Records Facility Operations Management		X	
Veronica Ballew	NWP-Quality & Contractor Assurance / Quality Assurance Programs & Supplier Quality Management			X
Bob Billett	NWP-Quality & Contractor Assurance / Corrective Action Program Management		X	
Amy Boyea	NWP-Quality & Contractor Assurance / Records Program Administration		X	
David Bright	NWP-Quality Assurance / Regulatory Program	X		
Becky Brown	NWP-Quality & Contractor Assurance / Regulatory Program		X	
Lisa Ciszek	NWP-Quality Assurance / Quality Engineering		X	
Tommy Estes Jr.	NWP-Quality Assurance / Quality Assurance Program		X	
Mike Fox	WRMS TFE Inc. / Records Facility Management		X	
Dondee Groves	WRMS TFE Inc. / Records Facility Operations		X	
Preston Harvey	NWP-Quality Assurance / Quality Engineering	X	X	X
Wm G. Helton	NWP-Quality Assurance / Quality Engineering		X	
Larry Klingler	NWP-Quality Assurance / Quality Assurance Program		X	
Mary McDaniel	NWP-Quality & Contractor Assurance / Quality & Contactor Assurance Management			X
Carla Miller	NWP-Quality Assurance / Quality Program		X	
Martin Navarrete	CBFO Office of Quality Assurance / Sr. Quality Program	X		
Sheri Saiz	NWP-Quality Assurance / Sr. Staff Administration	X		
Charles Tyler	NWP-Quality Assurance / Assessment Management	X	X	

NWP Implementing Procedures Evaluated – A-18-24		
NQA-1 Criteria	**Doc. Number**	**Applicable NWP Document**
15 – Control of Nonconforming Items		
	WP 13-QA3004	Nonconformance Report
16 – Corrective Action		
	WP 15-GM1002	Issues Management Processing of WIPP Forms
	MC 1.7	NWP Management Charter WIPP Form Screening Committee
	MP 1.41	NWP Management Policy Issues Management "WIPP Form"
17 – Quality Assurance Records		
	WP 15-RM	WIPP Records Management Program
	WP 15-RM3002	Records Filing, Inventorying, Scheduling, and Dispositioning
	WP 15-RM3003	Disposal of Nonpermanent Records in Office
	WP 15-RM3005	Records Transfer and Retrieval
18 – Audits		
	WP 13-QA.03	Quality Assurance Independent Assessment Program

List of the (ASME Criterion 10) *Inspection* and (ASME Criterion 14) *Inspection, Test, and Operating Status* based assessment of the NWP program

#	Title	Date	Assessment Report Summary
A-18-22	Nuclear Waste Partnership LLC Quality Assurance Program NQA-1-1989 Criteria 1 – 9	June 12 – 14, 2018	A-18-24 audit team reviewed the A-18-22 audit report and concurs with the determination that the NWP inspection and inspection, test, and operating status programs are adequately established for compliance with upper-tier requirements, satisfactorily implemented, and effective in achieving the desired results, considering the two CAQs identified during the audit. The A-18-22 audit scope included assessment of the inspection program. The A-18-22 audit team identified two CAQs during the audit and wrote two CBFO CARs. None of the CAQs/CARs were directly related to the NWP inspection or inspection, test, and operating status programs. CAR 18-040 – NWP is not trending NCRs in accordance with NWP procedures. CAR 18-041 – incomplete record forms and improper handling of records related to the document distribution process. The A-18-22 audit team wrote no CDAs, identified one Observation, and offered one Recommendation for management consideration. None of the items were directly related to the NWP inspection program. Observation #1 – Lack of reporting line representation on the NWP organizational chart for strict compliance with standard NQA-1 reporting designation. Revision of the organization chart will prevent a possible future CAQ where assessment of the organizational chart by outside assessment might indicate improper reporting line designation. Recommendation #1 – Clarification of the scope of a change to a document and consistent method of documentation of scope in the change history table to better indicate if a procedure implements new requirements or if a change is a concatenation of obsoleted procedures.

List of the (ASME Criterion 11) *Test Control* and (ASME Criterion 13) *Handling, Storage, and Shipping* based assessment of the NWP program

#	Title	Date	Assessment Report Summary
A-17-32	Nuclear Waste Partnership LLC (NWP) Material Control and Stores Inventory	February 7 – 9, 2017	A-18-24 audit team reviewed the A-17-32 audit report and concurs with the determination that the NWP Test Control and Handling, Storage, and Shipping Programs are adequately established for compliance with upper-tier requirements, satisfactorily implemented, and effective in achieving the desired results, considering the six CAQs identified during the audit. The A-17-32 audit scope included assessment of the NWP Test Control and Handling, Storage, and Shipping Programs. The A-17-32 audit team identified six CAQs during the audit and wrote five CBFO CARs and completed one CDA. None of the CAQs/CARs/CDA were directly related to the NWP Test Control Program. However, the five CAQs where CARs were issued are directly related to the Handling, Storage, and Shipping Program. CAR 17-017 – Revise NWP procedure WP 12-HP3200 to reflect the current process of warehouse personnel when handling packages that contain radioactive material. CAR 17-018 – Revise NWP procedure WP 15-PM3518 to state that purchased materials designated to be received at the site's main warehouse may only be accepted from an authorized representative of the vendor or subcontractor including a common carrier selected by the vendor. CAR 17-019 – Improper alteration and presentation of shipping authorization form for approval with incorrect or missing block numbers on the form. CAR 17-020 – shipping authorization forms missing required information such as dates, signatures, and form included blank spaces. CAR 17-021 – Material pick-up, transportation directly to work area, and installation / placement into service of an item prior to warehouse receipt and processing. CDA #1 – An isolated instance of lack of proper signatures for retirement / declaration of excess status of property with value in excess of $5,000.00 where the proper signatures were applied to the one form identified and closed with verification by the audit team.

List of the (ASME Criterion 11) *Test Control* and (ASME Criterion 13) *Handling, Storage, and Shipping* based assessment of the NWP program

#	Title	Date	Assessment Report Summary
			The A-17-32 audit team wrote two Observations, and offered no Recommendations for management consideration. None of the items were directly related to the NWP test control program. However, the five CAQs where CARs were issued are directly related to the Handling, Storage, and Shipping Program. Observation #1 – The current method for assigning store stock request numbers using a manual process logged in a spiral notebook might be automated to an electronic format to reduce the potential for human error and a future CAQ as numbers could be duplicated using the manual process. Observation #2 – The 11th bullet of form EA 15PM3509-2-0 referencing a signature for the "form originator" needs to be removed. Revision to the form will prevent a possible future CAQ where the originator might omit a signature and the information is evidenced elsewhere on the form with an unnecessary duplicate signature.

List of the two (ASME Criterion 12) *Control of Measuring and Test Equipment* based assessments of the NWP program

#	Title	Date	Assessment Report Summary
A-17-11	Nuclear Waste Partnership LLC Waste Handling Operations Program	July 11 – 13, 2017	A-18-24 audit team reviewed the A-17-11 audit report and concurs with the determination that the NWP control of measuring and test equipment program is adequately established for compliance with upper-tier requirements, satisfactorily implemented, and effective in achieving the desired results, considering the two CAQs identified during the audit. The A-17-11 audit scope included assessment of the NWP Measuring and Test Equipment Control Program. The A-17-11 audit team identified two CAQs during the audit and wrote one CBFO CAR and completed one CDA. None of the CAQs/CARs were directly related to the NWP Measuring and Test Equipment Control Program. CAR 17-041 – lack of clarity in NWP procedure WP 05-WH1015, *Preparation of CH Packaging for Empty Shipment*, related to the RCT work steps and RCT responsibilities associated with the procedure scope and implementation. CDA #1 – an isolated instance of errors in completion of forms including lack of necessary dated initials in an Attachment 1, *Empty CH Packaging Data Sheet* and incorrect dates in Attachment 1, *CH Packaging Form* remarks fields. The forms were corrected using a single lines through and initials and dates and the concern was closed during the audit with verification by the audit team. The A-17-11 audit team wrote no Observations, and offered one Recommendation for management consideration. None of the items were directly related to the NWP Measuring and Test Equipment Control Program. Recommendation #1 – recommend a revision of NWP procedure WP 05-WH1105, *CH Packaging Operations*, to include a statement of "as applicable" or "as needed" to the bulleted items that may not be applicable for entering into the tracking spreadsheet.

List of the two (ASME Criterion 12) *Control of Measuring and Test Equipment* based assessments of the NWP program

#	Title	Date	Assessment Report Summary
A-17-15	Nuclear Waste Partnership LLC Calibration Program	February 7-9, 2017	A-18-24 audit team reviewed the A-17-15 audit report and concurs with the determination that the NWP Measuring and Test Equipment Control Program is adequately established for compliance with upper-tier requirements, satisfactorily implemented, and effective in achieving the desired results, considering the five CAQs identified during the audit. The A-17-15 audit scope included assessment of the NWP Measuring and Test Equipment Control Program. The A-17-15 audit team identified five CAQs during the audit and wrote three CBFO CARs and completed two CDA. CAR 17-021 – lack of work step in work order requiring placement and verification of calibration sticker on skid equipment where calibrated equipment is installed. CAR 17-022 – lack of current calibration sticker for differential pressure indicators. CAR 17-023 – incorrect calibration laboratory physical address on calibration record packages. CDA #1 – an isolated instance of lack of current calibration sticker for one differential pressure indicator (411-PDT-052-31) and lack of documentation in logbook. Calibration documentation was reviewed indicating that equipment calibration was current, calibration sticker was placed, logbook was updated, and the concern was closed during the audit with verification by the audit team. CDA #2 – an isolated instance of an error on a form used to adjust calibration intervals and tolerances related to checking of a box in error indicating a tolerance adjustment that did not occur. The error was corrected using a single line through and initial and date and the concern was closed during the audit with verification by the audit team. The A-17-15 audit team wrote one Observation, and offered no Recommendations for management consideration. None of the items were directly related to the NWP Measuring and Test Equipment Control Program.

List of the two (ASME Criterion 12) *Control of Measuring and Test Equipment* based assessments of the NWP program

#	Title	Date	Assessment Report Summary
			Observation #1 – NWP procedure issued 03/02/15, WP 12-RC.01, Rev 11, *Quality Assurance Program Plan for Sampling Emissions of Radionuclides to the Ambient Air at the Waste Isolation Plant*, section 4.0 *Sample System Collection and Analysis* does not address the calibration of flow indicating transmitters for underground exhaust fan as described in IC413005 or calibration of suction flow transmitters for 41-B-956 and 41-B-957 as described in IC41087. IC413005 and IC41087 were issued June 2016. The team verified that the flow indicating transmitters for the underground exhaust fan and the suction flow transmitters for 41-B-956 and 41-B-957 are being properly calibrated. Revision of the procedure will prevent a possible future CAQ where calibration might not be performed and/or documented.