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Department of Energy
 Carlsbad Field Office
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 Carlsbad, New Mexico 88221
MAR 06 2019



Mr. Dennis Ivey, Manager
 Quality and Contractor Assurance
 Nuclear Waste Partnership LLC
 P.O. Box 2078
 Carlsbad, NM 88221-2078

Subject: Transmittal of Report for Surveillance S-19-25, NWP Environmental Sampling Program (Biota)

Dear Mr. Ivey:

Carlsbad Field Office (CBFO) Surveillance S-19-25 was performed February 20, 2019, to evaluate the Nuclear Waste Partnership LLC (NWP) Environmental Sampling Program (Biota). The results of the surveillance are provided in detail in the enclosed surveillance report. The surveillance team concluded that the NWP Environmental Sampling Program for biota, specifically quail, is satisfactory in the implementation of requirements and effective in achieving the desired results.

No concerns were identified during the surveillance.

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

Sincerely,

Dennis S. Miehls
 Senior Quality Assurance Specialist

Enclosure

cc: w/enclosure

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CBFO SURVEILLANCE REPORT

Surveillance Number: S-19-25

Date of Surveillance: February 20, 2019

Surveillance Title: NWP Environmental Sampling Program (Biota)

Organization: Nuclear Waste Partnership LLC (NWP)

Surveillance Team:

Dennis S. Miehls	Carlsbad Field Office (CBFO) Office of Quality Assurance (OQA) Management Representative
B.J. Verret	Surveillance Team Leader, CBFO Technical Assistance Contractor (CTAC)
Paul Gomez	Surveillance Team Member

SURVEILLANCE SCOPE:

Surveillance S-19-25 was conducted to verify the implementation and effectiveness of the NWP biota sampling activities, specifically quail, with respect to the requirements of the current CBFO *Quality Assurance Program Document* and NWP procedures.

SURVEILLANCE RESULTS:

The surveillance team conducted interviews with responsible personnel and examined documents and records generated, completed, and maintained as a result of the process related to quail biota sampling to determine the degree to which the requirements are implemented and effective. Field activities were observed, including setting of the live trap, removal of captured specimens, dispatch of specimens, sample initiation via chain-of-custody form completion, and storage of samples prior to transfer to the Waste Isolation Pilot Plant (WIPP) laboratory.

The surveillance areas are described below. No concerns were identified during this surveillance. The surveillance team concluded that the sampling process for biota is satisfactorily established for compliance with applicable upper-tier requirements, implementation is acceptable, and it is effective in achieving the desired results.

ACTIVITIES EVALUATED:

Evaluation of the biota sampling process included verification of the use of the current revision of procedure WP 02-EM1011, Revision 7-FR1, *Biotic Sampling*, observation of live trap installation, handling of specimens following capture, chain-of-custody initiation, sample storage, and transfer of the samples to the WIPP laboratory. Permits for sampling were reviewed to ensure current sampling activities were conducted within the allowed time frame of the WIPP Hazardous Waste Facility Permit, Attachment B1 (Other Environmental Permits, #115, New Mexico Department of Game and Fish, Biotic Collection Permit, Authorization #3293, Expires 12/31/2019), and as outlined in DOE/WIPP-99-2194, Rev. 10., *WIPP Environmental Monitoring Plan*, Section 5.2.5, Biotic Sampling.

Sampling Activities

The surveillance team reviewed documentation and interviewed responsible personnel regarding installation of live traps for capturing biota specimens and handling of these specimens following capture, specifically for quail. Activities began with a review of the current permit for sampling obtained from the State of New Mexico, expiring December 2019. The surveillance team accompanied the sampler to the live trap and observed activities following the live quail capture. The sampler performed the required steps per procedure WP 02-EM1011 Section 1.0, Biotic Sampling and Section 5.0, Post Sampling Activities, including activities for humanely euthanizing the samples, compositing of the samples, weighing the samples, sample bagging, filling-in Attachment 1 (Biotic Tissue Sample Data Sheet), and the initiation of chain of custody No. 10504 and sample preservation prior to hand-carry transfer of the sample to the WIPP laboratory. The sampler conducted trap set-up activities to demonstrate that procedure requirements were being followed. No concerns were identified during the surveillance.

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 collection of biota samples, specifically quail, are adequately established for compliance with upper-tier requirements, satisfactorily implemented, and effective in achieving the desired results.

CORRECTIVE ACTIONS, OBSERVATIONS, AND RECOMMENDATIONS:

Corrective Actions

No conditions adverse to quality were identified during the surveillance.

Observations

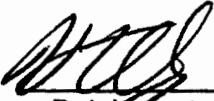
No Observations were identified during the surveillance.

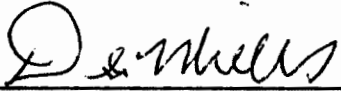
Recommendations

No Recommendations were offered to management for consideration.

SURVEILLANCE CONCLUSION:

The surveillance team concluded that the biota sampling process performed at the WIPP site for quail 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:  For B.J. Verret Date: 3/5/19
B.J. Verret, CTAC
Surveillance Team Leader

CBFO OQA Approval:  Date: 3-6-19
Dennis S. Miehl, CBFO
Senior Quality Assurance Specialist