

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

October 12, 2022

Ms. Marty Gonzales, Manager
Project Services
Nuclear Waste Partnership LLC
P.O. Box 2078
Carlsbad, NM 88221-2078

Subject: Contract DE-EM0001971 – Transmittal of Surveillance Report S-22-22,
CBFO Surveillance of NWP Shipment Monitoring Program – Central
Monitoring Room TRANSCOM Program

Dear Ms. Gonzales:

Enclosed is the report for Carlsbad Field Office (CBFO) Surveillance S-22-22, Nuclear Waste Partnership LLC (NWP) Shipment Monitoring Program (TRANSCOM-CMR). The surveillance was conducted September 27–29, 2022, at the Waste Isolation Pilot Plant near Carlsbad, New Mexico. The CBFO surveillance team concluded, in the areas evaluated and work observed, the NWP Shipment Monitoring Program is satisfactorily implemented, resulting in effective processes.

The CBFO surveillance team identified three concerns that were classified as two Corrective Action Reports (CARs) and one recommendation that was offered to NWP Facility Operations. Details of CAR 22-052 and CAR 22-053, and the recommendation, are documented in the enclosed surveillance report.

This letter provides technical direction only in accordance with the Technical Direction Clause (H.10) of the contract, and may not be construed to constitute a change to the contract. Any questions concerning allow-ability under, or changes to, the contract must be resolved by Mr. Daniel Burke, CBFO Contracting Officer, at (575) 361-0008 prior to your proceeding in any manner that might obligate the Government beyond the existing contract.

If you have any questions, please contact Mr. Mike Stapleton, CBFO Quality Assurance Division, at (814) 421-3322. For all other questions, please contact myself at (575) 361-4788.

Sincerely,

KY Craft
Jr.

Digitally signed
by KY Craft Jr.
Date: 2022.10.11
17:12:10 -06'00'

K. Y. Craft, Jr.
Alternate Contracting Officer's Representative
Carlsbad Field Office

Enclosure

cc: w/enclosure
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*ED denotes electronic distribution

CBFO SURVEILLANCE REPORT

Surveillance Number: S-22-22

Date of Surveillance: September 27 – 29, 2022

Surveillance Title: Nuclear Waste Partnership LLC (NWP) Shipment Monitoring Program Surveillance (TRANSCOM-CMR)

Organization: Nuclear Waste Partnership LLC (NWP)

Surveillance Team:	Mike Stapleton	Carlsbad Field Office (CBFO) Quality Assurance Division (QAD)
	Steve Shafer	Surveillance Team Leader, CBFO Technical Assistance Contract (CTAC)
	Paul Gomez	Team Member, CTAC
	Dan Standiford	Observer, CBFO National TRU Program

SURVEILLANCE SCOPE:

The surveillance team evaluated the implementation and effectiveness of the Central Monitoring Room (CMR) Transportation Tracking and Communication (TRANSCOM) shipment monitoring operations at the Waste Isolation Pilot Plant (WIPP) site.

The following shipment monitoring technical activities were evaluated:

- Maintenance
- Inspections
- Tests
- Surveillances
- Exercises
- Notifications

The following shipment monitoring quality assurance (QA) activities were evaluated:

- Training and Qualifications
- Nonconformance Reporting and Corrective Actions
- Document Control
- Records
- Work Processes
- Management and Independent Assessments

The surveillance was conducted at the WIPP site near Carlsbad, New Mexico.

GOVERNING DOCUMENTS/REQUIREMENTS:

Upper-tier documents:

- DOE/CBFO-94-1012, *CBFO Quality Assurance Program Document*, Rev. 13
- DOE/CBFO-98-3103, *TRU Waste Transportation Plan*, Rev. 4
- DOE/CBFO-10-3449, *TRANSCOM Program Plan*, Rev. 1
- DOE/WIPP-20-3574, *WIPP Continuity of Operations Plan*, Rev. 0 (Official Use Only—added at the start of surveillance)
- WP 13-1, *NWP Quality Assurance Program Description*, Rev. 40

NWP implementing procedures:

- WP 04-CM1002, *Shipment Monitoring: Routine Operations for the TRANSCOM Operator*, Rev. 25
- WP 04-CM1003, *Shipment Monitoring: Intersite Shipments for the TRANSCOM Operator*, Rev. 8
- WP 04-CM1004, *Shipment Monitoring: Empty Shipments for the TRANSCOM Operator*, Rev. 9
- WP 04-CM2002, *TRANSCOM Operator's Actions for Transportation Irregularities*, Rev. 33
- WP 04-CM3001, *Transportation 24-hour Emergency Response*, Rev. 5
- WP 08-NT3020, *TRU Waste Receipt*, Rev. 30
- WP 04-CM4001, *Loss of Communication Response*, Rev. 2 (added after start of surveillance)

SURVEILLANCE RESULTS:

The CTAC surveillance team determined that the NWP Shipment Monitoring Program is satisfactorily implemented and effective in achieving the desired results. Three concerns were identified during the surveillance, resulting in the issuance of two Corrective Action Reports (CARs) and submission of one Recommendation for management consideration.

ACTIVITIES EVALUATED:

The CTAC surveillance team evaluated the performance of the NWP Shipment Monitoring Program, including response to incidents and accidents. The surveillance team evaluated the NWP procedures utilized by the CMR Transportation

Communications Operator (TCO) to monitor and track routine transuranic (TRU) waste shipments, empty container shipments, intersite shipments, and transportation irregularities, and to receive transportation 24-hour emergency response requests. During review of procedures, a concern was identified related to inconsistency and accuracy in four of the procedures that could lead to a condition adverse to quality (CAQ). This concern resulted in the issuance of CAR 22-052, which is further discussed in the sections below. Two TRANSCOM TCO personnel were available for interview throughout the 3 days of the surveillance. The surveillance team verified proper tracking and documentation of 14 TRU waste program shipments (including 9 inbound and 5 empty outbound) from 4 of the WIPP program generator sites.

The team verified that the shipping tracking function remains separate and independent from the CMR function. The Transportation Logbook was reviewed and the entries verified that the drivers consistently notify the TCO approximately 2 hours prior to crossing any state line. The TCOs record all activity from the driver as well as the TCO responses in the CMR electronic daily logbook, which is maintained in the TRANSCOM system. The surveillance team verified live on September 28 that 2-hour notification border calls were made in preparation for crossings into Georgia and Alabama, and these calls were properly documented and logged into the electronic logkeeping system. Also, the team verified that an offsite accident was properly documented on WP 04-CM3001, *Attachment 1—Transportation Incident Summary*, dated September 21, 2022. This document was temporarily misplaced and later found in the Facility Operations (FO) office. The electronic log of the incident, numbered Off-site-04-CM002 C45 Accident, was completed as a late entry into the electronic log system. However, the log entry was found to not be documented with the “late entry” designation, and the time of the incident was not entered as required by procedure WP 04-CM2005.

QA Activities

Training and Qualifications – The surveillance team evaluated the training and qualifications of the shipment monitoring personnel by reviewing the Facility Operations TRANSCOM System Operator qualified list provided by the Facility Operations Manager. The list includes the names, Department of Transportation Emergency Response Information qualifications, and qualification card information for 36 personnel. Of the 36 personnel, only 2 required training that was due to be completed by the end of the month. These 2 individuals were identified at the 05:45 shift turnover meeting on September 28, and were confirmed as being qualified at that time to perform their duties. At the time of the surveillance, no Facility Operations personnel present, including the Facility Shift Managers (FSMs), were considered not qualified to perform work, as documented by the Facility Operations—TRANSCOM System Operator qualified list and the three HFWP Position—Facility Operations Shift Engineer (FOSE) and FSM Qualification list.

Two operator qualification cards were obtained from NWP Training for the operators observed. It should be noted that the logkeeping procedure is a read-and-sign requirement for all NWP workers; however, no specific training on late entry logging is

offered. Once this was pointed out, the Facility Operations Manager agreed that this may be an area where the training could be improved.

Nonconformance Reporting and Corrective Actions – The surveillance team requested Nonconformance Reports (NCRs) that have involved the shipment monitoring program from the NWP QA Engineer, who stated that there were no NCRs from the shipment program in the last couple of years. The surveillance team verified this with the QA Engineer. However, there was a CAR issued by the CBFO Office of the National TRU Program (ONTP), CAR 20-028 dated October 19, 2020, that is discussed in Technical Activities for Exercises, Drills, and Emergencies section of this report.

Document Control – The surveillance team verified that current procedures and required operator aid documents are located in the work area. The binder of procedures was verified as current by the backshift FSM and the day FSM using the D2 SFTP site. Once the documentation verification is complete, the binder is brought to the CMR, where the CMR turnover meeting occurs. At all times during the surveillance, the operators had the procedures at their work station. The surveillance team verified that document control is conducted almost completely by electronic means (e.g., CMRO Daily Log) for the CMR in the shipment monitoring program, with the exception of NWP procedures WP 04-CM2002, Attachment 2–*Safe Parking Checklist*, and WP 04-CM3001, Attachment 1–*Transportation Incident Summary*.

Records – The surveillance team verified the Records Inventory and Disposition Schedule (RIDS) for WIPP Facility Operations, dated 12/14/2021, and for the ALUET Aerospace Engineering/TRANSCOM, dated 10/13/2021. The records are electronic and are transferred to archives per the RIDS. The electronic records disposition will not occur for 75 years. Other Facility Operations records that have ties to CMR TRANSCOM are kept in the Facility Operations office in Fire King file cabinets. These include original incident reports and checklists.

Work Processes – The surveillance team observed the processes properly followed and maintained by facility operators. There was an exception per concern involving the Incident Report, see CAR 22-053, involving the logging of time and appropriate date of incidents. The surveillance team verified the status board for loaded and empty shipments to and from the WIPP and generator sites Los Alamos National Laboratory, Oak Ridge National Laboratory, Idaho National Laboratory, and Lawrence Livermore National Laboratory. Also, the team reviewed documentation of weekly radio inspections and tests for Facility Operations surface radio units, CMR base radio, CMR cellular phone, CMR satellite phone, and TRANSCOM cellular phone.

Management and Independent Assessments – The surveillance team verified two management reports, which included one surveillance, S20-34, dated 9/14-29/2020, submitted under QA:20:00227, the Transmittal and Closure of QA surveillance S20-34, Facility Operations/Facility Shift Manager/Central Monitoring Room, and one audit, I17-14, dated 6/28 through 7/19/2017, submitted under QA:17:00295, the Transmittal and

Closure of NWP QA Audit I17-14, Facility and Underground Operations. All documentation concerning both assessments were complete and properly maintained.

Technical Activities

Exercises, Drills, and Emergencies

Through a request from the CBFO ONTP, CTAC verified sustained corrective actions from CAR 20-028, dated October 19, 2020, which identified that NWP operations was not applying requirements of Department of Energy Order 150.1A, Attachment 1, *Contractor Requirements Document*, to the CMR TCO 24/7 shipment tracking. Nuclear Waste Partnership had no alternate location identified in NWP procedures for the CMR TCO to relocate for continued 24/7 shipment monitoring. Nuclear Waste Partnership's corrective actions, as stated below, were verified:

Revise WP 04-CM2002, Transportation Communications Operator's Actions for Transportation Irregularities, WP 04-CM3003, CMR Response to Communication Loss Alar*, and WP 04-CM4001, Loss of Communication Response to ensure:

1. TRANSCOM TCC is notified of the CMR Transportation Communications Operator (TCO) need to relocate to an alternate operating location and
2. Identification of the alternate operating locations for continued 24/7 shipment monitoring.

In addition, the Waste Isolation Pilot Plant (WIPP) Emergency Management administered a drill for the purpose of assuring facility and emergency response personnel can adequately respond to an emergency at the site. On June 30, 2022, Emergency Management and Facility Operations conducted a TRANSCOM relocation drill for the D crew Transportation Communication Operator (TCO) at the WIPP Site.

The purpose of the drill was to demonstrate the ability of the TCO to successfully relocate from the CMR to an alternate location in response to a loss of internet connectivity in accordance with WP 04-CM2002, Transportation Communications Operator's Actions for Transportation Irregularities, WP 04-CM4001, Loss of Communication Response, and WP 04-CM1002, Shipment Monitoring: Routine Operations for the Transportation Communications Operator. The drill was conducted under WIPP EMERGENCY MANAGEMENT DRILL PLAN, Drill Number: DR-CY2022-14. As a follow up to the drill, CBFO-ONTP requested the surveillance follow-up on this emergency response action and corrective actions.

Procedure WP 04-CM2002 was verified by the surveillance team as being amended and an alternate location was identified as the Transportation Trailer. When asked about the procedure followed in the event all computers crash in the CMR or there is a loss of power to the CMR, the TCO explained that notifications would be made to the FSM on duty and the TRANSCOM Communications Center at the Skeen-Whitlock Building. Then the TCO explained that operations would be moved to the Transportation Trailer and a

transportation engineer computer would be used to re-establish communications and tracking of shipments. This action was then performed and completed with login and total communications capability for tracking of shipments re-established within approximately 10 minutes upon arrival at the Transportation Trailer. Through this demonstration, the surveillance team was able to determine that the process is satisfactorily implemented and effective.

Unresolved Issue:

There are 14 Facility Operations radios missing from the Facility Operations Weekly Radio Inspection Checklist. There could be Accountability/Safety/Procurement/ Property Management and Control/Transportation Security (49 Code of Federal Regulations) requirements related to these missing radios. This issue, if deemed a CAQ, will be issued in a CAR separate from this surveillance.

CONCLUSION:

Overall, the CBFO QAD/CTAC surveillance team determined that the NWP Shipment Monitoring Program CMR TRANSCOM monitoring process is satisfactorily implemented and effective.

CORRECTIVE ACTIONS:

During the surveillance, the CBFO QAD/CTAC surveillance team identified three concerns.

Corrective Action Reports:

Two CAQs were identified during the surveillance that resulted in the issuance of two CARs.

CAR-22-052

Of the four CMR procedures reviewed, there were two inconsistencies identified:

- 1) Corrections to WP 04-CM1004, Attachment 1-System Description, was modified with paragraph 3 being deleted because this responsibility is no longer accurate and in use. However, there are two procedures (WP 04-CM1002 and WP 04-CM1003) with Attachment 1, paragraph 3, remaining.
- 2) There is a procedural step inconsistency in WP 04-CM1003, Rev. 8, Section 5.5.1:

TCO, **WHEN** notified by the Driver or site personnel of the completion of a shipment,
THEN PERFORM the following:

- **ENSURE** an arrival message was sent by Drivers in the TRANSCOM messaging system.

There is no provision in this bullet step for the site personnel to send a message that the shipment arrived in the system.

CAR-22-053

The CMR electronic log has an entry without a date and time documented for an accident that occurred during shipment #MTOR220011, and was found to be incomplete. The electronic log did not include the marking "LATE ENTRY" followed by the original time of the event.

Corrected During the Surveillance:

No CAQs were corrected during the surveillance.

Observations:

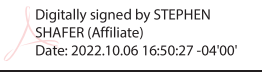
No Observations were identified during the surveillance.

Recommendations:

One Recommendation was provided to NWP Management for consideration.

Concern: The current CMR TRANSCOM WIPP Transportation Notification Numbers list is dated 9/17/2020 and the National Directory of Law Enforcement Administrators book is dated 2019.

It is recommend that these two methods of obtaining notification phone numbers, as identified in WP 04-CM1003, be reviewed annually and updated as necessary.

Surveillance Team Leader Signature: STEPHEN SHAFER (Affiliate)  Digitally signed by STEPHEN SHAFER (Affiliate)
Date: 2022.10.06 16:50:27 -04'00' Date: _____
Stephen Shafer

CBFO QA Lead Approval Signature: MICHEAL STAPLETON  Digitally signed by MICHEAL STAPLETON
Date: 2022.10.11 11:48:38 -06'00' Date: _____
Michael Stapleton

Attachment 1 – Personnel Contacted During the Surveillance

PERSONNEL CONTACTED DURING SURVEILLANCE (S-22-22)				
Name	Organization/ Title	Pre-Surveillance Meeting	Contacted During the Surveillance	Post-Surveillance Meeting
David Biswell	NMED/Enviro Scientist-LA	X	X	X
Veronica Ballew	NWP/QA Manager	X	X	
Sheri Saiz	NWP/QA Staff Admin.	X	X	X
Amy Boyea	NWP/QA Staff Admin.		X	X
Mike Proctor	NWP/FO Manager	X	X	X
Jamie Callison	NWP/FO Admin.	X	X	
David Lowell Bartlett	NWP/CMR Operator		X	
Taren Wright	NWP/CMR Operator		X	
Donnie Jurney	NWP/FO FSM		X	
Raymond Valenzuela	NWP/Transportation Eng.		X	
Christina Sing	NWP/Training Coordinator		X	
Davin Jensen	NWP/WIPP Security Officer		X	
Lashelle Najera	NWP/Records		X	
Chris Belis	NWP/FO FSM		X	
Paul Paneral	NWP/FO Asst. Manager		X	
Tim Taulbee	NWP/ES&H Manager	X		
Greg Brown	NWP/FO FSM/Qual. Eng.		X	
Jim Maupin	CTAC/Construction Oversight		X	
Della Murray	ALUET/TRANSCOM		X	