WIPP Library

WASTE ACCEPTANCE CRITERIA
CERTIFICATION COMMITTEE

AUDIT REPORT

WIPP PROJECT OFFICE

Audit Report Number 911-010
Dates of Audit August 19-22, 1991
Audit Subject WIPP 13-4

Harold J. Davis, WACCC Chairman

Lead Auditor

23 Aug 91
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I. INTRODUCTION

This report presents the results of the audit conducted by the Waste Isolation Pilot Plant (WIPP) Waste Acceptance Criteria Certification Committee (WACCC) at the WIPP on August 19-22, 1991.

Audit Team Members:

DOE Audit Leader - Jose Muros
Auditor - Ronald Knobel
Auditor - Geoffrey Quinn
Auditor - Robert Davis
Auditor - Robert Spooner
Auditor - Larry Danese
Auditor - Maureen Coughlin
Auditor - Kenneth Kok
Auditor - Howard Cummings

Observers:

Tom Stroud (Westinghouse)
Jim Kenney (EEG)
Harold Davis (DOE/WACCC)
Pat McCasland (NMED)

Pre-Audit Opening Meeting

The opening meeting was held on August 19, at the WIPP site, with personnel present from DOE, the MOC, Westinghouse, and the observers. Those attending are listed on Attachment C.

Audit

The audit consisted of interviews, tour of the Waste Handling Building #411 and document reviews - each of which presented opportunities for verification of adequate program implementation.

Post-Audit Closure Meeting

The closeout meeting was held on August 22, at the WIPP site, to present preliminary findings and observations, as well as, a brief summary of the audit. Those attending are listed on Attachment D.

II. AUDIT SCOPE

The audit verified implementation by WIPP of programs, procedures, plans, etc., necessary to fully comply with the requirements of the WIPP WP 13-4, "Waste Isolation Division Quality Assurance Plan for the Procurement, Use, Maintenance and Repair of TRUFACT-IT".

The audit was divided into three areas (QA, Procedures Implementation and Regulatory Compliance) to verify the necessary implementation.
Quality Assurance

Ensure that the Quality Assurance Program as defined in WP 13-4 (Waste Isolation Division Quality Assurance Plan for the Procurement, Use, Maintenance, and Repair of TRUFACT-II) is in place and implemented.

Procedures Implementation

Ensure the implementation of procedures by looking at usability (current issue, user friendly), accessibility, stated responsibilities versus actual process, and awareness of applicable procedures (changes, conflicts, acceptance).

Regulatory Compliance

Ensure that the TRUFACT-II Program is in compliance with the DOE Orders 1540.2 and 5480.3; Title 10 CFR 71, 49 CFR 262, and 49 CFR 100-199; DOE/WIPP 88-026; and TRUFACT-II C of C/SARP.

III. EXECUTIVE SUMMARY

This audit of the WIPP WP 13-4 Quality Assurance Plan, for which the Westinghouse Electric Corporation is responsible for its implementation, was performed prior to the first scheduled shipment of radioactive waste to the WIPP. It resulted in one finding and 11 observations. (The observations are, like the finding, perceived weaknesses or problems which require corrective actions, but are considered of a less-serious nature.)

The finding was a result of an incorrect reference in one of the procedures. The procedures are considered necessary in order to ensure implementation of the QA Plan as well as ensuring compliance to the WIPP, DOE and NRC requirements. Audit finding was closed out on August 22, 1991.

IV. AUDIT FINDINGS AND OBSERVATIONS

Definitions

FINDINGS

A finding is a direct noncompliance to a program or a procedural requirement which requires a response consisting of root cause, corrective action and action to prevent recurrence. Action to prevent recurrence should be a solution to the root cause. Because the audit was a sampling of the activities, findings may be symptomatic of more extensive problems. Therefore, when the auditee investigates findings and develops corrective actions, the entire program for the procurement, use, maintenance and repair of TRUFACT-II should be considered.
An observation is usually a weakness or problem which, if left uncorrected, could become a significant condition adverse to quality. A response is required to an observation that should include a plan of action that evaluates the mention of possible deficiencies relating from this condition.

2.0 Finding

2.1 Quality Assurance

Certified Inspectors

GAI 7-2 para 4.2, only personnel certified to perform inspections in accordance with GAI 10-1 shall conduct source inspections.

Discussion:

Although Inspection Services certifies their inspectors for source inspection, QA Engineering does not and four personnel of QA Engineering are performing source inspections.

3.0 Observations

3.1 Procedure System for QA Program

There is no system in place to ensure that all procedures are developed, reviewed, and implemented to preclude conflicts, duplication, or omissions of the QA Program.

Discussion:

HID has some very good plans in place such as the Fleet Management Plan (which identifies the responsibilities for those departments which support the TRUPACT-II as well as identifying the department with primary and support responsibility for each function) and the Configuration Control Plan (which addresses almost all of the procedures which apply to the TRUPACT-II Program). However, some deficiencies exist in the system of procedures which, if not addressed, could cause problems later. Some examples are:

- Review of WP 13-4 identified that several procedures are listed in Attachment 1 that do not implement requirements of WP 13-4 also procedures which should have been included in Attachment 1 of WP 13-4 are not included, such as those in Figure 4-9 of WP 09-9.

- WP 13-1 Section 8.0 requirements are not included in WP 13-4. Although there is a good system for identifying and controlling items, the system is not proceduralized.

- Procedure GAI 9-2, Magnetic Particle Testing, should be added to the procedure matrix of WP 13-4.
3.2 Working/Planning Procurement File

A working/planning procurement file, to contain the PR, PO, Source Inspection Planning, Receipt Inspection planning, etc. should be developed for use by the Quality Assurance Organization.

DISCUSSION:

As discussed with P. Damm and D. Walker of the QA Engineering group, such a central file would aid in the review of the PO to the PR and aid in the planning phases of source and receipt inspection.

3.3 Disposition of NCR's

Dispositioning of NCR's and obtaining corrective actions is not being performed in a timely manner. NCR 90-041 written 8/9/90, and NCR 90-058, written 11/16/90, still lack a disposition, NCR 89-054, written 10/19/89, is still not closed.

DISCUSSION:

10 CFR 71.133 states, "The licensee shall establish measures to assure that conditions adverse to quality are promptly identified and controlled."

3.4 Revised Procedure Awareness

It was observed that in all departments a higher level of awareness is required concerning new or revised procedures.

DISCUSSION:

While reviewing procedures, it was shown that many personnel were not aware of new or revised procedures. It is noted, however, that different levels of awareness are required for various departments. Many managers stated that pertinent personnel reviewed controlled copies so they were updated through this mechanism. Other mechanisms were to read and sign sheets, staff meetings and discussions, as well as, field reviews. The team concluded that this was a good base for awareness, but, additional steps need to be taken to counteract potential problem areas.

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Procedures Implementation

Observations

3.5 Shipment Records

Originals of shipment records are maintained in a master file in the Transportation and Hazardous Materials Handling (THM) Office. Procedure WP 06-105 requires that they be transferred in accordance with DOE/WIPP 89-013.

DISCUSSION:

The original shipping documents, including receiving survey drawings, are stored in a fire proof safe in the THM Office. In accordance with WP 06-105, "Transportation Record Keeping," these records should be transferred to the Master Record Center and an information copy retained in the THM Office.

3.6 Controlled Document

Controlled Location #7 has a stamped "controlled copy" of QA1 7-5 and according to Debbie Biscaino of document control, the QA1 7-5 has been canceled.

DISCUSSION:

Bill Greenlee verified per telexon with Debbie that the procedure has been canceled. Attachment 1 of the QA Plan WP 13-4, identified QA1 7-5 as applicable. However, QA1 7-5 was not listed in the Index to WID Controlled Procedures. QA1 7-5 discovered in the QA manual at Location #7.

3.7 Procedure Implementation

Contrary to WP 04-901 (TRUPACT-II Material Control) para. 4.0, valve handles were found without part numbers and two packages of port plugs were found without P.O. numbers.

DISCUSSION:

Contrary to the requirement listed in WP 04-901 (TRUPACT-II Material Control) paragraph 4.0, which states that "Spare parts will be labeled with the WID Purchase Order Number and Part Number," one box of valve handles for Bin #048 were found in cabinet TP-7 (warehouse) without WID Part Number on the item box. Two packages of Port Plugs in see through plastic bags were found in the same cabinet without the WID purchase order number on the package. The Part Number was on the items and visible through the plastic bags.
Regulatory Compliance

Observations

3.8 Empty TRUPACT-II Shipment Procedure

Procedure WP 06-104, Rev. 4, "Empty TRUPACT-II Shipment," refers to procedure WP 05-106, "TRUPACT Unloading," which has been canceled.

DISCUSSION:

Discussions were held with the Manager of Transportation and Hazmat Handling to determine if controlled procedures are in place which ensure that empty TRUPACT-II's are prepared for shipment to meet 49 CFR 173.427 (b). One procedure needed for shipment of empty TRUPACT-II's is WP 06-104, Rev. 4, "Empty TRUPACT-II Shipment." There are references in Section 3.0, Section 5.0 Step 3, and Attachment 1 of WP 06-104 which refer to procedure WP 05-106, "TRUPACT Unloading" for information needed to complete WP 06-104.

The Manager of Transportation and Hazmat Handling plans to revise WP 06-104 to cite the correct procedure for the source of the necessary information.

3.9 Preparation of an Empty TRUPACT-II for Shipment Procedure

Procedure WP 05-WH1015, PCN 00.01, Preparation of an Empty TRUPACT-II for Shipment, does not provide for initialling of steps which satisfy or verify Acceptance Criteria. Obtaining initials is required for such steps per procedure WP 15-7, PCN 00-04, Operations Procedures Writers Guide.

DISCUSSION:

Discussions were held with Waste Handling Supervisors and Technicians to determine if controlled procedures are in place which ensure that TRUPACT-II packages are prepared for shipment and operated in accordance with SHIP Chapter 7.0, "Operating Procedures." One procedure needed for TRUPACT-II operations at WIPP is, WP-05 WH1015, PCN 00.01, "Preparation of an empty TRUPACT-II for shipment". Some steps in WH 1015 satisfy or verify acceptance criteria needed to meet 49 CFR 173.427 (b).

When steps satisfy or verify acceptance criteria, procedure WP 15-7, PCN 000-04, "Operations Procedures Writers Guide", requires the step to be initialed as having been successfully completed. One of the discussions with Waste Handling Operations expanded to include the Supervisor of Procedures, who confirmed initials are required for some steps in WP-05 WH1015.

- 7 -
3.10 Tracking Systems for Annual and 5-year Inspection Procedure

No procedure or method exists for determining when an individual TRUFACT-II is placed in service for purposes of determining when an annual or 5-year inspection is due.

DISCUSSION:

Section 8.2 of the TRUFACT-II SARP requires the performance of annual and 5-year inspections. A procedure or methodology for tracking when a package comes into use following first use or the completion of an annual, and which provides for recall of a package whose annual or 5-year inspection is due, is needed to meet the requirement.

3.11 Annual and 5-year Inspection Procedure

Section 8.2 of the TRUFACT-II SARP requires the performance of specific inspection and tests annually and at 5-year intervals. No procedures exist for the inspections and tests.

DISCUSSION:

The SARP describes, in Chapter 8 Section 2.0, the inspections and tests that must be performed in order to verify the continued integrity of the TRUFACT-II. Procedures to perform those required tests on an annual or 5 year basis must be developed before these inspections and tests can be performed and documented. This is a certificate of compliance item.

V. OPEN ITEMS FROM PREVIOUS AUDITS

There were no open items from previous audits.
ATTACHMENT A

NOTIFICATION MEMORANDUM
AUG 15 1991

SI: HJD 91-0629
Announcement of WACCC Audit of WIPP WP 13-4 Compliance at the WIPP Site -
August 19-22, 1991
Jerry Reese, WPO

The Waste Acceptance Criteria Certification Committee (WACCC) audit of WIPP
WP 13-4 compliance has been scheduled for August 19-22, 1991. The audit
team will consist of Jose Munoz (DOE Audit Team Leader), Robert Spooner,
Maureen Coughlin, Geoffrey Quinn, Robert Davis, Ronald Knobel, Larry
Daneese, Roland Seyler, Kenneth Kok and Howard Cummings - Auditors. Also
participating in the audit as observers are Tom Stroud (Westinghouse), Jim
Kenney (EEG) and Harold Davis (DOE/WACCC Chairman).

The audit will review the WIPP compliance to the requirements of WIPP
WP 13-4. Please make available for review, the controlled copies of
applicable documentation (implementing procedures and directives) which
address the implementation of WP 13-4 audit items.

The WACCC audit team suggests an audit opening meeting to be held at
8:00 am on August 19, 1991, in the Large Conference Room at the site and an
exit meeting to be held at 9:00 am on August 22, 1991, also in the Large
Conference Room at the site. We request that appropriate personnel from the
DOE office and contractor be in attendance at these meetings.

If you have any questions on this matter, please contact me at
(505) 885-7330.

Harold J. Davis
WACCC Chairman

CC:
Arlen Hunt, WPO
Bob Wise, WPO
LaMar Trego, WID
Carl Cox, WID
WACCC File
TO: Harold J. Davis, WFO

Audit Number: WACCC 91A-010

Audit Organization:

Waste Isolation Pilot Plant (WIPP)
(Transportation QA Program)

Purpose and Scope of Audit:

The audit will verify implementation of programs, procedures, plans, etc. by WIPP necessary to fully comply with the requirements of the WIPP WP 13-4.

Audit Team Members:

DOE Audit Leader - Jose Munoz
Auditor - Ronald Rhobel
Auditor - Geoffrey Quinn
Auditor - Robert Davis
Auditor - Bob Spooner
Auditor - Larry Danese
Auditor - Roland Seyler
Auditor - Kenneth Eok
Auditor - Howard Cummings

Observer - Tom Stroud (Westinghouse)
Observer - Jim Kenney (EEG)
Observer - Harold Davis (DOE/WACCC)

Audit Schedule:

Pre-Audit Opening Meeting - 8:00 am, August 19, 1991
Post-Audit Closure Meeting - 9:00 am, August 22, 1991

Reference Documents:

DOE/WIPP 89-012
Background Information:

Operational Readiness Review (WIPP)

If you have any questions or need additional information regarding this audit plan, please call Hal Davis, WACCC Chairman, at (505) 885-7330.

[Signature]

DOD Audit Team Leader
MEETING ATTENDANCE RECORD

AUDIT #: WACCC 91A-010  DATE: 19 Aug 91  TIME: 4:00 P.M.
AUDITED ORG: Waste Isolation Pilot Plant  LOCATION: WOIC
AUDIT TEAM LEADER: José R. O. Muñoz  DOE/AL/OGD

| Team Briefing/Orientation | Pre-Audit Conference | Team Caucus | Post-Audit Conference |

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<th>ORGANIZATION</th>
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<tbody>
<tr>
<td>Howard C. Cummins</td>
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<td>Emma Celik</td>
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<td>Auditor</td>
<td>SAIC</td>
<td>1-404-951-7002</td>
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<tr>
<td>Jeffrey J. Bell</td>
<td>Auditor</td>
<td>WASTREN</td>
<td>1-800-540-0022</td>
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<td>Ronald C. Krippel</td>
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<td>Maureen Coughlin</td>
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<td>Bob Sweeney</td>
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<td>Robert L. Ray</td>
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<td>575-884-3800 (505) 885-7330</td>
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<tr>
<td>José R. O. Muñoz</td>
<td>Lead Auditor</td>
<td>DOE/AL/OGD</td>
<td>845-6734</td>
</tr>
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ATTACHMENT C

PRE-AUDIT OPENING MEETING ATTENDANCE
# MEETING ATTENDANCE RECORD

**AUDIT #:** WACCC 91A-010  
**DATE:** 19 Aug 91  
**TIME:** 8:00 a.m.  
**AUDITED ORG:** Waste Isolation Pilot Plant  
**LOCATION:** Las Cruces, NM  
**AUDIT TEAM LEADER:** José R. O. Muñoz  
**DOE/AL/OOD**

- **Team Briefing/Orientation**
- **Team Caucus**

- **Pre-Audit Conference**
- **Post-Audit Conference**

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<thead>
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<th>TITLE</th>
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<tbody>
<tr>
<td>Maureen Coughlin</td>
<td>Transportation Packaging Engineer</td>
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<tr>
<td>Peter Dann</td>
<td>QA Eng</td>
<td>WQ1</td>
<td>7-8593</td>
</tr>
<tr>
<td>Paul Sanchez</td>
<td>Geologist II</td>
<td>New Mexico Environment Dept</td>
<td>897-8468</td>
</tr>
<tr>
<td>Bill Greenece</td>
<td>Sr. QA Eng</td>
<td>WQ1</td>
<td>887-8195</td>
</tr>
<tr>
<td>Robert E. Davis</td>
<td>WACCC Auditor</td>
<td>DOE/WACCC</td>
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<tr>
<td>Stan W. Schuler</td>
<td>Water/Soil Scientist III</td>
<td>NMED</td>
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<tr>
<td>Jerry Kersey</td>
<td>Environmental Senator</td>
<td>BEC</td>
<td>875-9675</td>
</tr>
<tr>
<td>Kirk Wayne</td>
<td>WACCC Chemist</td>
<td>DOG</td>
<td>845-2330</td>
</tr>
<tr>
<td>Mark Powell</td>
<td>UT6/1256</td>
<td>VOLT</td>
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</tr>
<tr>
<td>Susan Y. Pickering</td>
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<td>Pat Charlet</td>
<td>SNL QA Representative</td>
<td>TRW/SNL</td>
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</tr>
<tr>
<td>Lynn Brown</td>
<td>Sr. QA Eng</td>
<td>DOE/AST/QA</td>
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### MEETING ATTENDANCE RECORD

**Audit #:** WACCC 91A-010  
**Date:** 17 Aug 91  
**Time:** 9:00 a.m.

**Audited Org:** Waste Isolation Pilot Plant  
**Location:** Conf Rm / WIPP Site  
**Audit Team Leader:** José R. O. Muñoz  
**Doe/Al/OqD**

- **Team Briefing/Orientation**
- **Team Caucus**
- **Pre-Audit Conference**
- **Post-Audit Conference**

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<tr>
<td>Geoffrey J Quinn</td>
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<td>885-0554</td>
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<td>Howard D. Cummings</td>
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<td>UNC Analysis</td>
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<td>Ronald C. Knoerzer</td>
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<td>Roland F Seylar</td>
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<td>WR White</td>
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<td>W.D. McMillan</td>
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<td>Owner</td>
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<td>Tom Strong</td>
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<td>José R. O. Muñoz</td>
<td>Lead Auditor</td>
<td>DOE/AL/OQD</td>
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ATTACHMENT D

POST-AUDIT CLOSURE MEETING ATTENDANCE
# MEETING ATTENDANCE RECORD

**AUDIT #:** WACCC 91A-010  
**DATE:** 27 Aug 91  
**TIME:** 9:00 a.m.  
**AUDITED ORG:** Waste Acceptance Pilot Plant  
**LOCATION:** WIPP/Spot B-127  
**AUDIT TEAM LEADER:** José R. O. Muñoz  
**DOE/AL/OOD**

<table>
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<tr>
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<tr>
<td>L. R. Fitch</td>
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<td>W. R. Chiquelin</td>
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<td>Mgr. QA</td>
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<td>Jim Atchensen</td>
<td>W10 QA/E</td>
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<td>Lynn Brown</td>
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<td>Doe/Asi Q</td>
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<td>L. Meier Trigo</td>
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<td>Michael H. McFadden</td>
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<td>Larry Patrick</td>
<td>Mgr. Natural Resources Int.</td>
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<td>885-7434</td>
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# MEETING ATTENDANCE RECORD

**AUDIT #:** WACCC 91A-010  
**DATE:** 22 Aug/91  
**TIME:** 9:00 a.m.

**AUDITED:** West Isolation Pilot Plant  
**LOCATION:** MAF/EPA Hilli

**AUDIT TEAM LEADER:** José R. O. Muñoz  
**DOE/AL/OOD**

- □ Team Briefing/Orientation
- □ Team Caucus  
- X Post-Audit Conference

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<td>885-7330</td>
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<tr>
<td>Kenneth D. Kok</td>
<td>Auditor</td>
<td>LATA</td>
<td>509 783-4369 505 885-7447 505 885-8585</td>
</tr>
<tr>
<td>Tom Stroud</td>
<td>Audit Observer</td>
<td>W/TTI</td>
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<tr>
<td>D.I. Roberts</td>
<td>Trayect Maint.Eng.</td>
<td>WHD</td>
<td>885-8585</td>
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<tr>
<td>Tony Ferguson</td>
<td>Mgr. Housing</td>
<td>WED</td>
<td>509 807-820 404-952-7002</td>
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<td>Larry Danese</td>
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<td>SAIC</td>
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<td>Tom Halverson</td>
<td>Eng. Services</td>
<td>W</td>
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<td>H.W. Bellows</td>
<td>Eng. Services</td>
<td>W</td>
<td>887-8257</td>
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<tr>
<td>Michael McClelland</td>
<td>WRS III</td>
<td>NMED</td>
<td>887-8983</td>
</tr>
<tr>
<td>Jim W. Kennery</td>
<td>Enr. Engr.</td>
<td>EEC</td>
<td>885-9675</td>
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### MEETING ATTENDANCE RECORD

**AUDIT #: WACCC 91A-010**  
**DATE:** 22 Aug 91  
**TIME:** 9:00 a.m.  

**AUDITED ORG:** Waste Isolation Pilot Plant  
**LOCATION:** WIPP/Support Bldg.

**AUDIT TEAM LEADER:** José R. O. Muñoz  
DOE/AL/OGD

<table>
<thead>
<tr>
<th>Team Briefing/Orientation</th>
<th>Pre-Audit Conference</th>
<th>Post-Audit Conference</th>
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<td>Team Caucus</td>
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<th>NAME</th>
<th>TITLE</th>
<th>ORGANIZATION</th>
<th>PHONE #</th>
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</thead>
<tbody>
<tr>
<td>William D. McMillan</td>
<td>Waste Handling Supervisor</td>
<td>WIPP/ESNL</td>
<td>817-8546</td>
</tr>
<tr>
<td>R. O. Boyer</td>
<td>Manager, OHP (W)</td>
<td>OHP</td>
<td>887-8573</td>
</tr>
<tr>
<td>J. Winfield</td>
<td>Manager, Trans &amp; HPR</td>
<td>TRM/HCDC</td>
<td>957-8234</td>
</tr>
<tr>
<td>José R. O. Muñoz</td>
<td>Lead Auditor</td>
<td>DOE/AL/OGD</td>
<td>845-6734</td>
</tr>
</tbody>
</table>

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