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Audit Report Number 91A-010
Dates of Audit August 19-22, 1991
Audit Subject WIPP 13-1

**WASTE ACCEPTANCE CRITERIA
CERTIFICATION COMMITTEE**

AUDIT REPORT

WIPP PROJECT OFFICE

Harold J. Davis 8/23/91
Harold J. Davis, WACCC Chairman

J. P. G. M.
Lead Auditor

23 Aug 91
Date



WACC CERTIFICATION AUDIT OF WIPP WP 13-4 COMPLIANCE AT WIPP

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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 Munoz
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 TRUPACT-II".

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 TRUPACT-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 TRUPACT-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 TRUPACT-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 TRUPACT-II should be considered.

OBSERVATION

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 prevention of possible deficiencies relating from this condition.

2.0 Finding

2.1 Quality Assurance

Certified Inspectors

QAI 7-2 para 4.2, Only personnel certified to perform inspections in accordance with QAI 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:

WID 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:

- o 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.
- o 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.
- o Procedure QAI 9-2, Magnetic Particle Testing, should be added to the procedure matrix of WP 13-4.

- o There is no procedure for the preparation/standardization of QA Plans.
- o WP 04-901 should be added to the matrix list of WP 13-4.
- o Tagging of removable parts to ensure that final assembly has all necessary parts.
- o Tracking of preventative maintenance per a procedure.

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 89-064, 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.

Procedures Implementation

Observations

3.5 Shipment Records

Originals of shipment records are maintained in a master file in the Transportation and Hazardous Materials Handling (T&HM) 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 T&HM 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 T&HM Office.

3.6 Controlled Document

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

DISCUSSION:

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

3.7 Procedure Implementation

Contrary to WP 04-901 (TRUFAC-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 (TRUFAC-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 SARP 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.

3.10 Tracking Systems for Annual and 5-year Inspection Procedure

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

DISCUSSION:

Section 8.2 of the TRUPACT-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 TRUPACT-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 TRUPACT-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

United States Government

Department of Energy

memorandum

Albuquerque Operations Office
Waste Isolation Pilot Plant
Carlsbad, New Mexico 88221

DATE: AUG 15 1991
REPLY TO:
ATTN OF:
SUBJECT: SI:HJD 91-0629
Announcement of WACCC Audit of WIPP WP 13-4 Compliance at the WIPP Site -
August 19-22, 1991
TO: 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 Danese, 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

ATTACHMENT B

WISNY PLAN

memorandum

Albuquerque Operations Office

DATE: AUG 14 1991

REPLY TO
ATTN OF:SUBJECT: Audit Plan for the WACCC Certification Audit of WIPP WP 13-4 Compliance at
WIPP - August 19-22, 1991

TO: Harold J. Davis, WFO

Audit Number : WACCC 91A-010

Audited 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 Minoz
Auditor - Ronald Knobel
Auditor - Geoffrey Quinn
Auditor - Robert Davis
Auditor - Bob Spooner
Auditor - Larry Danese
Auditor - Roland Seyler
Auditor - Kenneth Kok
Auditor - Howard CummingsObserver - 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
Document Review, Interviews and Discussions - August 19-22, 1991

Reference Documents:

DOE/WIPP 89-012

Halold J. Davis, WFO

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AUG 14 1991

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.



Joe Farris

DOE Audit Team Leader

MEETING ATTENDANCE RECORD

AUDIT #: WACCC 91A-010 DATE: 18 Aug 91 TIME: 4:00 pm.

AUDITED ORG: Waste Isolation Pilot Plant LOCATION: WOIC

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

Team Briefing/Orientation

Pre-Audit Conference

Team Caucus

Post-Audit Conference

NAME	TITLE	ORGANIZATION	PHONE #
Howard W. Cummings	Auditor	LNC Analytical Services	1-208-522-1055
Kenneth L. Kik	Auditor	LATA	1-509-783-4369
Larry Danese	Auditor	SAIC	1-404-952-7002
Jeffrey J. Zimm	Auditor	WASTREN	1-301-540-0022
Ronald C. Knobel	Auditor	MAC/DOE	1-305-885-7330
Maureen Coughlin	Auditor	DOE/WIPP	1-505-885-7322
Bob Szymon	auditor	DOE/WPU	505-885-7331
Poland Seylar	auditor	LATA	505-884-3900
Robert E. Davis	auditor	MAC/DOE	(505) 885-7330
José R. O. Muñoz	Lead Auditor	DOE/AL/OOD	845-6734

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: Large Geologic Storage Site
 AUDIT TEAM LEADER: José R. O. Muñoz DOE/AL/OOD

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

NAME	TITLE	ORGANIZATION	PHONE #
Maureen Coughlin	Transportation Packaging Engineer	DOE/WIPP	505 885-7329
Peter Damm	QA Eng	QA	7-8693
Paul Sanchez	Geologist III	New Mexico Environment Dept	887-8448
BILL GREENLEE	SR QA ENGR	QA	887-8195
Robert E. Davis	WACCC Auditor	DOE/WACCC	(505) 885-7332
Arthur W. McFarland	Water Resource Specialist II	NMED	887-8983
Jim Kemmer	Environmental Scientist	BEG	895-9675
Hal Davis	WACCC Chairman	DUG	845-7330
Mark Powell	WTG/PSG	VOIF	5-7416
SUSAN Y. PICKERING	SNL QA CHIEF	SNL	887-8430
Pat Charlet	SNL QA Representative	TRI/SNL	887-8670
LYNN BROWN	SR. QA ENG.	DOE/ASIS/QA	887-8388
Larry Danese	Auditor	SAIC	404 952-9002

MEETING ATTENDANCE RECORD

AUDIT #: WACCC 91A-010 DATE: 19 Aug 91 TIME: 8:00 a.m.
 AUDITED ORG: Waste Isolation Pilot Plant LOC: Conf Rm / WIPP Site
 AUDIT TEAM LEADER: José R. O. Muñoz DOE/AL/OOD

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

NAME	TITLE	ORGANIZATION	PHONE #
Geoffrey J Quinn	AUDITOR	WASTREN	885-0554
Howard D. Cummings	Auditor	UNC Analytical Services	1-208 522-1055
RONALD C. KNOBEZ	AUDITOR	MHC/DOE	885-7330
ROLAND F SEYLER	auditor	LATA	505 884-3800
KENNETH D. KOK	AUDITOR	LATA	509- 783-4369
WJR WHITE	OPS MGR	(W) OPS	505 887-826
W.D. McMillian	W.H. Supervisor	(W) OPS	505 887-8586
W.A. Keely	(W) HRD	(W)	887-8413
Tom Stroud	observer	(W) TI	885-7447
José R.O. Muñoz	Lead Auditor	DOE/AL/OOD	845-6734

ATTACHMENT D

POST-AUDIT CLOSURE MEETING ATTENDANCE

MEETING ATTENDANCE RECORD

AUDIT #: WACCC 91A-010 DATE: 22 Aug 91 TIME: 9:00 a.m.
 AUDITED ORG: Waste Treatment Pilot Plant LOCATION: WIPP/Support Bldg
 AUDIT TEAM LEADER: José R. O. Muñoz DOE/AL/OOD

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

NAME	TITLE	ORGANIZATION	PHONE #
L.R. Fitch	A.G.M.	(W)	7-8485
W.R. CHIQUELIN	MGR, TRANS. ENGR.	(W)	885-7575
W.H. Caplanigan	MGR QA	(W)	887-8901
Jim ATCHENSON	W/O QA E	W	7-8203
LYNN BROWN	SR. QA SPEC.	DOE/ASI Q	7-8380
LAMAR TRUGO	W-GM	W	7-8200
Michael H. McFadden	DOE/WPO		885-7302
Hal Davis	DOE/WPO		885-7330
Bill GREENLEE	SR QA ENGR	(W)	887-8195
Bob Spooner	DOE/WPO	DOE	885-7331
Maurice Coughlin	DOE/WPO	DOE	885-7329
GEOFFREY QUINN	AUDITOR	WASTREN	885-0554
LARRY PATRICK	MGR, NATTRU PGMS INT.	W	885-7434

MEETING ATTENDANCE RECORD

AUDIT #: WACCC 91A-010 DATE: 22 Aug/91 TIME: 9:00 a.m.
 AUDITED: Waste Isolation Pilot Plant LOCATION: WIAP/Support Building
 AUDIT TEAM LEADER: José R. O. Muñoz DOE/AL/OOD

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

NAME	TITLE	ORGANIZATION	PHONE #
Chris Forbes	Mgr., Publications/Products	<u>W</u>	887-8689
Howard D. Cummings	Auditor	UNC Analytical Services	1-208-522-1055
ROBERT E. DAVIS	AUDITOR	MACTEC	(505) 885-7330
ROUARD C. KNOBEL	AUDITOR	MACTECH	505 885-7330
KENNETH D. KOK	AUDITOR	LATA	509 783-4369
Tom Stroud	Audit observer	<u>W</u> / T.I.	505 885-7447
D.I. ROBERTS	TRUCK MAINT ENGR	W HD	505 885-8585
Tom Ferguson	Mgr. Hoisting	WHD	587-8775
LARRY DANESH	Auditor	SAIC	404-952-7002
Tom Halverson	(W) Engineering	(W)	887-8390
H.W. BELLONS	(W) ENGINEERING/CC&D	(W)	887-8257
Arthur W. McClelland	WRS III*	NMED	887-8983
Jan W. Kenney	Enr. En.	EEG	885-9675

