



# ENVIRONMENTAL EVALUATION GROUP

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AN EQUAL OPPORTUNITY / AFFIRMATIVE ACTION EMPLOYER

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May 8, 2001



Dr. Inés Triay  
Manager  
Carlsbad Field Office  
U.S. Dept. of Energy  
P.O. Box 3090  
Carlsbad, NM 88221-3090

Dear Dr. Triay:

Attached is Dr. Jim Channell's trip report of INEEL Surveillance May-01-06, which was conducted on May 1, 2001.

EEG believes the Surveillance was well conducted and we agree with the handling of the one observation.

Please call Jim Channell if there are questions.

Sincerely,

Matthew K. Silva  
Director

MKS:JKC:pf

cc: Mary Kruger, EPA  
Steve Zappe, NMED

010509





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**DATE:** May 8, 2001  
**TO:** Matthew K. Silva  
**FROM:** James K. Channell *JKC*  
**SUBJECT:** INEEL Surveillance May 01-06, 2001

I attended this one-day surveillance at INEEL's RWMC Facility. The surveillance was limited and included an evaluation of the adequacy, implementation, and effectiveness of the quality assurance program related to the organizational structure of the INEEL TRU Program. EPA also inspected the QA program. In addition there were evaluations of: (1) a trailer mounted real time radiography unit; (2) TRUPACT unloading and loading operations; and (3) hydrogen and methane analysis by Micro GC/TCD and VOCs by GC/FID. I observed the RTR and TRUPACT portions of the surveillance.

TRUPACT-II Unloading and Loading. RWMC has new loading docks that will replace the existing one as soon as authorized by CBFO. Since the handling procedures are significantly different on the new loading docks it was decided that a demonstration needed to be audited. The loading of waste containers into the TRUPACT-II was judged to be similar enough at the new docks to not require auditing.

The demonstration went well and there were no concerns or observations made by auditors on the unloading or loading operation. TRUPACT-II parts procurement, calibration of instruments and tools, and TRUPACT-II maintenance procedures were also audited. The only finding of the surveillance involved TRUPACT-II maintenance procedures.

There have been problems in the past with RWMC not doing TRUPACT-II leak tests at all of the required times. In some cases leak tests are never required, in other cases they are required only when certain parts are replaced, and in other cases they are required at all times. To simplify these requirements WTS had prepared for RWMC a one page sheet specifying when leak testing was and was not required. The problem detected at this surveillance was that leak tests were being performed in some cases where they were not required. Leak tests were performed in all cases where they were required. This finding was labeled as observation, for not following instructions. Future performance

Matthew Silva  
Page 2  
May 8, 2001

will be monitored from Carlsbad and could lead to a CAR if deviations from procedures persist. I agreed with this interpretation of the problem and the classification as an observation.

Trailer Mounted RTR Hoist. This is RWMC's second RTR unit and has been rented to increase output. The principal focus of the audit was to verify that the image resolution of the rental RTR unit was equal to or higher than the current SWEPP RTR system. A real waste drum (inorganic solids) was viewed and the quality judged to be equivalent.

RWMC has talked about obtaining a Digital Radiographys/Computed Tomography (DR/CT) unit but has no plans to do so. The current RTR + visual examination system is operational and certified and there is no desire to abandon it at this time.

QA and Gas Analyses. The audits found these activities to be satisfactory and there were no findings.

Miscellaneous Item. Fissile Gram Equivalent limits (325 FGE per TRUPACT-II) are the reason INEEL ships so many dunnage drums to WIPP along with waste drums.

Summary. The Surveillance was well conducted and I agree with the handling of the one observation.