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Department of Energy

Memorandum

Carlsbad Field Office
Carlsbad, New Mexico 88221

DATE: August 28, 2001

REPLY TO ATTN OF: CBFO:QA:MLC:VW:01-1433:UFC:2300

SUBJECT: CBFO Surveillance Report S-01-34, Idaho National Engineering and Environmental Laboratory

TO: Edward Ziemianski, ID

The Carlsbad Field Office (CBFO) conducted a surveillance of the Idaho National Engineering and Environmental Laboratory (INEEL) transuranic waste program on July 10 - 12, 2001. The results of the surveillance are documented in the attached report.

Two Observations and one Recommendation are documented in the surveillance report. Observations denote conditions that if not corrected could lead to noncompliance with requirements.

If you have any questions or comments concerning this report, please contact me at (505) 234-7311.

Thomas J. Reese
Acting Quality Assurance Manager

Attachment

cc: w/attachment
I. Triay, CBFO
K. Watson, CBFO
L. Chism, CBFO
D. Winters, DNFSB
S. Monroe, EPA
M. Eagle, EPA
S. Zappe, NMED
B. Walker, EEG
T. Monk, BBWI
T. Preston, BBWI
M. Gerle, WTS
S. Calvert, CTAC

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U.S. DEPARTMENT OF ENERGY
CARLSBAD FIELD OFFICE

SURVEILLANCE REPORT
OF THE
IDAHO NATIONAL ENGINEERING AND ENVIRONMENTAL LABORATORY (INEEL)

Scoville, Idaho

SURVEILLANCE NUMBER S-01-34

July 10-12, 2001

INEEL RECOVERY FROM THE WASTE CHARACTERIZATION "STAND DOWN"

Prepared by: _____ **Date:** 8/24/01
Wayne Ledford
Surveillance Team Leader

Approved for Issue by: _____ **Date:** 8/27/01
Thomas J. Reese
Carlsbad Field Office
Acting Quality Assurance Manager

1.0 EXECUTIVE SUMMARY

Carlsbad Field Office (CBFO) Surveillance S-01-34 was conducted to evaluate the adequacy, implementation and effectiveness of INEEL's efforts to recover from the recent "stand down" that resulted in the suspension of waste characterization and shipping at the INEEL. The surveillance team also evaluated the compliance of INEEL with the shipping restrictions imposed by CBFO as a result of the lack of EPA approval of the "WAGS" NDA system and the management controls applied to the certification and shipment of TRU waste. No conditions adverse to quality were identified during the surveillance.

2.0 SCOPE

This surveillance team evaluated the adequacy, implementation and effectiveness of INEEL's efforts to recover from the recent "stand down" that resulted in the suspension of waste characterization and shipping at the INEEL. The surveillance team also evaluated the compliance of INEEL with the shipping restrictions imposed by CBFO as a result of the lack of EPA approval of the "WAGS" NDA system and the management controls applied to the certification and shipment of TRU waste.

3.0 SURVEILLANCE TEAM

Wayne Ledford	Surveillance Team Leader, CTAC
Marlin Horseman	Surveillance Team Member, CTAC

4.0 SURVEILLANCE PARTICIPANTS

Personnel contacted during the surveillance included the following:

Tom Monk, Site Project Manager (SPM)
Rod Arbon, SPM Designee
Mike Griffin, Waste Certification Official
Gary Grissom, Transportation Certification Official
Tim Preston, Site Quality Assurance Officer (SQAO)
David Bright, Operations Manager
Molly Anderson, SQAO Designee
Lori Fritz, DOE-ID
Jerry Wells, DOE-ID
Tom Johnson, Document Control
Greg Knox, BBWI Quality Assurance
Kenneth Krevanek, Engineer
Lee Sygitowicz, Program Manager

5.0 SUMMARY OF SURVEILLANCE RESULTS

5.1 Surveillance Activities

5.1.1 Recovery From the Waste Characterization Stand Down

Due to issues surrounding the use of the WAGS system for characterization of drums shipped to WIPP without prior CBFO or EPA review of the system and shipment of drums to WIPP using gas generation testing (GGT) data that had not been validated, INEEL entered into a "stand down" from shipments of drums to WIPP and characterization of drums at INEEL.

The surveillance team reviewed the plan INEEL developed to exit the stand down and their subsequent actions to implement that plan. INEEL developed a "Recovery Action Plan, 3100 M3 Project" dated July 3, 2001 that describing the actions that had to be completed to exit the stand down. To deal with the possibility that other procedural adequacy issues might exist that were similar to those that caused the problem with the GGT data, INEEL performed a review of processes related to characterization and shipment of waste. This recovery plan allow the processes to be put back into operation one at a time. The processes reviewed were: drum venting, real-time-radiograph, WAGS, swepp gamma ray spectroscopy (SGRS), passive/active neutron assay (PAN), headspace gas, gas generation testing, environmental chemistry laboratory, TRIPS, and TRUPACT II loading operations. Objective evidence of these reviews and acceptance by the Site Project Office was reviewed by the surveillance team.

Conduct of operations formal training was also required to preclude recurrence of the procedural noncompliance issues which led to the GGT noncompliance. Objective evidence of the content and implementation of this training was reviewed by the surveillance team.

During the review of this area several NCRs related to waste characterization were reviewed. While all the affected waste was properly controlled, it was noted that the electronic system used for nonconformance tracking (ICARE) only allows one actionee to be flagged in the system. This can result in NCRs with multiple actionees becoming stagnant in the system. In one case an NCR was noted that had been open for six months, and the person who had to take action to close the NCR was unaware that he had an action to perform. See Observation 1.

Based on this review, the INEEL process for exiting the stand down appeared to be adequate, satisfactorily implemented, and effective.

5.1.2 Verification of Shipment Data Processes and Compliance With the WAGS Shipping Restriction

The surveillance team interviewed representative INEEL personnel involved with validation and shipment of TRU waste to WIPP, these included a WCO (Waste Certification Official), a TCO (Transportation Certification Official), project level data validation personnel, the SQAO (Site Quality Assurance Officer), and the SPM (Site Project Manager).

All personnel interviewed use the TRIPS (Transuranic Reporting, Inventory and Processing System) to verify the readiness of waste to be shipped to WIPP. Individuals completing the various activities performed to validate characterization data, select drums for a payload, and find shipment preparation were well versed in the use of TRIPS. The various validation processes appeared to be very effective in assuring that the drums have been properly characterized and are ready for shipment to WIPP. Whenever irregularities are noted they are categorized as anomalies and follow-up occurs.

The Project Level Data Reviewers are now performing an extra verification to assure that drums assayed using the Waste Assay Gamma Spectroscopy (WAGS) process are not shipped to WIPP until the unit is certified by EPA. QA surveillances were reviewed to determine that they were being performed and 2) that any noted deficiencies or concerns were being addressed. Ten surveillances were reviewed. The surveillance team noted the following: 1) Some report folders contained checklists or marked up procedures and some did not, 2) in some cases the checklists identified a surveilled item with a "No" relative to acceptability and there was no indication that the "No" items were formally documented nor corrected. The SQAO agreed to review all surveillances performed in Calendar Year 2001 to verify that proper actions have been taken to address the surveillance concerns. See Observation 2.

Overall the surveillance team concluded that the validation and processes used to ensure that only acceptable waste is shipped to WIPP are adequate, implemented, and effective.

6.0 CORRECTIVE ACTIONS, OBSERVATIONS, AND RECOMMENDATIONS

6.1 Observations

Observation 1

INEEL should review their open NCRs and assure that personnel that have actions pending completion are aware of those actions.

INEEL should review all surveillances performed in calendar year 2001 to verify that identified concerns had been properly categorized and appropriate actions had been taken to address those concerns.

6.2 Recommendations

Recommendation 1

Some personnel expressed a concern that the process used to change TRIPS (Change Request or Error Report) was not fully understood, others readily understood the process. It may be worthwhile for TWCP to provide a brief training memo to users of TRIPS to reiterate the process.