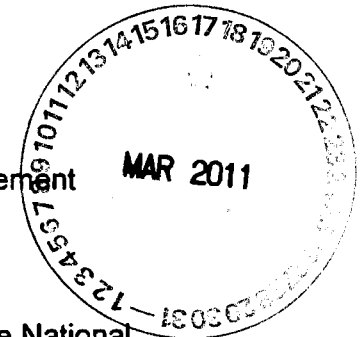


United States Government

Department of Energy

memorandumCarlsbad Field Office
Carlsbad, New Mexico 88221DATE: **MAR 17 2011**REPLY TO
ATTN OF: CBFO:OQA:DSM:MAG:11-0494:UFC 2300.00SUBJECT: Surveillance Report S-11-06, ANL/CCP Gravimetric or Dimensional Measurement
Characterization Process

TO: Mr. Dale Dietzel, DOE-CH



The Carlsbad Field Office (CBFO) conducted Surveillance S-11-06, Argonne National Laboratory Central Characterization Project (ANL/CCP) Gravimetric or Dimensional Measurement Characterization Process, March 8-9, 2011, in Carlsbad, New Mexico. During CBFO Audit A-10-23, this process was deemed indeterminate due to insufficient documentation available for evaluation. Documentation was generated and provided to the team during this surveillance.

The surveillance team concluded that the ANL/CCP technical and quality assurance programs for this activity are adequate for compliance with the CBFO *Quality Assurance Program Document* and the Waste Acceptance Criteria. The audit team also concluded that, overall, the ANL/CCP programs and procedures were satisfactorily implemented and effective. The surveillance report is attached.

If you have any questions or comments, please contact me at (575) 234-7491.

Dennis S. Miehls
Senior Quality Assurance Specialist

Attachment

cc: w/attachment

| | | | |
|-----------------------|-----|-------------------------------------|----|
| D. Miehls, CBFO | *ED | S. Ghose, EPA | ED |
| M. Navarrete, CBFO | ED | R. Lee, EPA | ED |
| J. R. Stroble, CBFO | ED | S. Zappe, NMED | ED |
| T. Morgan, CBFO | ED | S. Holmes, NMED | ED |
| K. Joshi, DOE-CH | ED | T. Kesterson, DOE OB WIPP NMED | ED |
| D. Haar, WTS/CCP | ED | D. Winters, DNFSB | ED |
| D. Ploetz, WTS/CCP | ED | P. Gilbert, LANL-CO | ED |
| V. Cannon, WTS/CCP | ED | G. Lyshik, LANL-CO | ED |
| A. J. Fisher, WTS/CCP | ED | G. Knox, CTAC | ED |
| M. Walker, WTS/CCP | ED | K. D. Martin, CTAC | ED |
| Y. Salmon, WTS/CCP | ED | WIPP Operating Record | ED |
| T. Peake, EPA | ED | WWIS Database Administrators | ED |
| M. Eagle, EPA | ED | CBFO QA File | |
| E. Feltcorn, EPA | ED | CBFO M&RC | |
| R. Joglekar, EPA | ED | *ED denotes electronic distribution | |

110328



CBFO SURVEILLANCE REPORT

Surveillance Number: S-11-06 Date of Surveillance: March 8 – 9, 2011

Surveillance Title: Argonne National Laboratory Central Characterization Project (ANL/CCP)
Gravimetric or Dimensional Measurement Surveillance

Organization: ANL/CCP

Surveillance Team:

| | |
|--------------|---|
| Greg Knox | Surveillance Team Leader, CBFO Technical Assistance Contractor (CTAC) |
| Jim Oliver | Technical Specialist, CTAC |
| Tammy Bowden | Auditor, CTAC |

Surveillance Scope:

The surveillance team evaluated ANL/CCP's ability to perform gravimetric or dimensional measurement of remote-handled (RH) debris waste (Summary Category Group S5000) Fuel Examination Waste (FEW) material for certification and subsequent disposal at the Waste Isolation Pilot Plant (WIPP). The physical dimensional measurement of the FEW material at ANL was observed during ANL/CCP Audit A-10-23, conducted August 3 – 5, 2010, and was found acceptable. However, insufficient documentation was provided to the audit team to perform a thorough evaluation of the total process through final certification. Therefore, for Audit A-10-23, the gravimetric or dimensional measurement process was deemed indeterminate.

Results:

This surveillance focused on those areas found to be indeterminate during Audit A-10-23. In particular, the surveillance team examined the reviews performed at the data generation level (DGL) through an independent technical review and ultimately through the Site Project Manager (SPM.) The surveillance team reviewed BDRs and interviewed project staff to ensure that the independent technical review had been performed adequately and by a properly qualified and trained individual and that the SPM-level review was adequate.

The surveillance team examined the use of ORIGEN2.2 software to examine a range of fuel types and how these data were captured, analyzed, and ultimately used with the dimensional data to identify and quantify the radionuclides and their associated radiological properties. This is necessary for determining whether a container is eligible for disposal at WIPP and tracking the necessary parameters through the Waste Database System.

The surveillance team deemed the gravimetric or dimensional measurement process as defined in CCP-TP-513, Rev. 1 to be adequate, satisfactorily implemented and effective. No deficiencies were identified and the surveillance team documented one Observation and offered two Recommendations.

Corrective Action Reports:

No Corrective Action Reports were issued as a result of the surveillance.

Deficiencies Corrected During the Surveillance:

No deficiencies were identified that were corrected during the surveillance.

Observations:

Observation 1:

Initially, the surveillance team was unable to trace the Rad. Calculation Package documentation to the DGL BDR. When asked, the ANL/CCP SPM was unable to readily provide the requested traceability. Additional interviews with ANL/CCP personnel provided the information requested.

Recommendations:

Recommendation 1:


The surveillance team recommends that the individual responsible for the origination of the "Acceptable Difference" memo to the SPM be identified for clarity (CCP-TP-513, section 2.4.3).

Recommendation 2:

The surveillance team recommends the memo to the SPM documenting the "Acceptable Difference" values used to determine if observed measurements are in agreement with anticipated values (i.e., AK) be included in the documentation packages.

ANL/CCP representatives acknowledged these concerns and revised the BDRs and Rad. Calculation Packages to include the pertinent documentation. ANL/CCP also committed to revising CCP-TP-513.

Surveillance Team Leader Signature:


Greg Knox

Date: 17 MAR 2011

Assistant Manager/Office Director:

N/A

Date: _____

CBFO Acting QA Director Approval Signature:



Date: 3-17-11