

United States Government

Department of Energy

memorandum

Carlsbad Field Office
Carlsbad, New Mexico 88221

DATE: February 9, 2001

REPLY TO
ATTN OF: CBFO:OOM:CW:GS:01-0012:UFC 1100.00

SUBJECT: WIPP Environment, Safety, and Health Assessment Summary Report

TO: Mr. William Boyce, DOE/EM-5

This information is the Carlsbad Field Office (CBFO) response to commitment #20 of the Implementation Plan for DNFSB Recommendation 2000-2 which reads: "Annually, LPSOs will review the results of ES&H assessments performed during the previous year and provide the Secretary with a summary report for each of their sites."

The Waste Isolation Pilot Plant (WIPP) conducts periodic Environment, Safety, and Health (ES&H) assessments to identify opportunities for improvements. Program, process, and system level assessments are conducted in accordance with DOE O 414.1A, Quality Assurance. In calendar year 2000, the WIPP implemented new mechanisms in the assessment process to provide additional direction and emphasis on continuous improvement. Those included a methodology for conducting continuous improvement assessments through the development and implementation of WP 13-09, *Continuous Improvement Assessments*, as well as a premise for including safety awareness components in WP 13-07, *Self-Assessment Program Plan*. These enhanced mechanisms provided demonstrable continuous improvement in meeting DOE expectations specified in DOE P 450.5, "Line Environment, Safety, and Health Oversight".

Program level assessments are used to determine whether overall organizational programs are properly established and implemented, including the integration of processes designed to achieve organizational goals and customer expectations. The assessments serve as a management tool for monitoring ES&H performance measures and indicators. They also focus on the effectiveness of special safety programs such as the Integrated Safety Management System and the Voluntary Protection Program.

Process level assessments involve the examination and verification that work controls are effectively implemented to protect workers, the public, and the environment. This includes a myriad of assessments such as:

- Involvement of the system engineers in conducting periodic facility conditions inspections through the site's Condition Assessment Surveys and Capital Asset Management Process Inspections program;
- Annual assessment and update of the Fire Hazards Analysis;
- Pre-MSHA inspections of the surface and underground facilities;
- Emergency Management drill and exercise program; and
- Formal audits of the processes such as lockout/tagout.

System level assessments focus on whether appropriate leadership and support systems are provided to enable the safe implementation of work processes. System level assessments include:

- Standards/Requirements Identification Document (S/RID) reviews pertaining to overall programmatic compliance and validation involving assessment of DOE Orders, the CFR, and other regulatory drivers;
- Assessments/investigations resulting from incidents, injuries, and near misses;
- Industrial safety field monitoring assessments of areas such as noise monitoring, dust exposure evaluation, and ergonomic reviews; and
- Assessments conducted to address employee safety concerns.

These three levels of assessments all provide formal documentation, trending, and a corrective action process to resolve deficiencies. The scopes of audits, assessments, and surveillances were based on evaluations of previous assessment results, current work scopes, as well as applicable requirements and regulatory drivers.

Assessment results have been valuable to WIPP's efforts in enhancing ES&H programs. Opportunities for improvements are being properly addressed through the CBFO Corrective Action Request (CAR) system, tracked on the WIPP commitment tracking system, and have been closed, or are currently on schedule for timely closure. A brief summary of the 28 ES&H assessments conducted during CY 2000 are listed in the attached table.

As requested by Michael Oldham's memorandum of January 31, 2001, Dr. Chuan Wu of my staff has provided an electronic copy of this summary report to you by e-mail. We appreciate your guidance in the preparation of this summary report and other matters related to the implementation of DNFSB Recommendation 2000-2. If you have any questions, please contact Dr. Wu at (505)234-7552.

Dr. Inés R. Triay
Manager

Attachment

cc:

Thomas Evans, DOE/EM
Lynne Wade, DOE/EM
Bruce Lilly, CBFO
Chuan Wu, CBFO
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WIPP ES&H ASSESSMENTS - CY 2000						
	ASSESSMENT #	ASSESSMENT TITLE	ORGANIZATION CONDUCTING ASSESSMENT	DATE	SCOPE	FINDINGS & STATUS
1.	100-03	Metrology Program	WID Quality Assurance	January 2000	Evaluation of the Metrology Program and related radiological monitoring equipment and Quality Assurance Program requirements.	11 findings. Status: This assessment and related actions are closed.
2.	SAS-00-01	WID Lockout/ Tagout Program	WID Quality Assurance	01/15/00 - 02/29/00	To determine the effectiveness of implementation of the applicable procedures.	No Findings
3.	MA 2000-02	WID Emergency Management Program	WID Quality Assurance	02/10/00 - 02/25/00	Evaluation included the activities associated with program administration, hazards survey and assessment, emergency readiness assurance planning, drills & exercises, the Emergency Operations Center, the Joint Information Center, emergency response, emergency medical support, personnel training, procedures and document control, corrective actions and records.	14 Corrective Action Requests (CARs). Status: This assessment and related actions are closed.
4.	SAS-00-02	WID Hazardous Material Handling Program	WID Quality Assurance Program	02/14/00 - 03/16/00	Focused on the processes and activities associated with hazardous material handling to determine the effectiveness of implementation of site-specific procedures in meeting compliance expectations.	No findings.
5.		40 CFR 191, Subpart A	CAO Informal Surveillance	02/14/00 - 02/15/00	Compliance with 40 CFR 191, Subpart A.	No findings.
6.	ECA00-002	VOC Monitoring Program	WID Environmental Compliance Assessment Program (ECAP)	02/23/00 - 02/28/00	Evaluation of the implementation of the RCRA Permit, Module 4 and Attachment N in the Volatile Organic Compound Monitoring Program.	No findings.

WIPP ES&H ASSESSMENTS - CY 2000

	ASSESSMENT #	ASSESSMENT TITLE	ORGANIZATION CONDUCTING ASSESSMENT	DATE	SCOPE	FINDINGS & STATUS
7.		Integrated Safety Management	WID ES&H (subcontract)	March 2000	Annual review of the implementation and effectiveness of the Integrated Safety Management System.	11 Areas for improvement were identified. Status: This assessment and the related actions are closed.
8.	ECA00-003	Groundwater Monitoring Program	WID ECAP	03/09/00 - 03/13/00	Evaluation of the implementation of the RCRA Permit, Module 5 and Attachment L in the Groundwater Monitoring Program/Detection Monitor Program.	1 finding. Status: This assessment and the related actions are closed.
9.	S-00-03	WWIS Quality Assurance Program	CAO	03/13/00 - 03/15/00	Evaluate the functional and operational requirements of the WWIS data management system and those QA related functions needed to evaluate the integrity and validity of the WWIS data. The surveillance evaluated a sample of production and test software baselines including software modules and supporting documentation baselines.	2 CARs. Status: This assessment and the related actions are closed.
10.	100-02	Radiation Access Control	WID QA	April 2000	Evaluation of Radiation Access Control in compliance with site-specific procedures.	3 CARs. Status: One CAR is closed and the other two are on schedule for completion.
11.	100-05	ALARA Program	WID QA	April 2000	Evaluation of the compliance and implementation of requirements of the Dosimetry program and the As Low As Reasonably Achievable (ALARA) Program.	7 findings. Status: This assessment and related actions are closed.

WIPP ES&H ASSESSMENTS - CY 2000

	ASSESSMENT #	ASSESSMENT TITLE	ORGANIZATION CONDUCTING ASSESSMENT	DATE	SCOPE	FINDINGS & STATUS
12.	SAS-00-03	WID Occupational Health Program	WID QA	04/03/00 - 04/07/00	Evaluation of the Worker Protection Policy implementation portions of Occupational Health Program, including occupational health plan, emergency treatment, pharmaceutical services, facilities, equipment, and qualified personnel.	No findings.
13.	SAS-00-06	WID Underground Operations	WID QA	04/04/00 - 04/25/00	Review of planning and implementation of the programmatic requirements contained in the appropriate CFRs and other upper tier requirements involving the programmatic administration of Underground Operations, such as Escape and Evacuation Plan, the Hazardous Waste Permit, Control of Operator Aids, Document Distribution, and Records requirements.	No findings.
14.	DOE HQ OA-30	WIPP Emergency Management Program	DOE HQ OA	05/01/00 - 05/11/00	To Assess selected emergency management system elements that focus on WIPP's readiness to protect site personnel and the public from consequences of onsite events; and to evaluate the site's ability to provide appropriate information or assistance to local responders following an offsite event.	5 findings.
15.	100-07	WIPP Laboratories	WID QA	May 2000	Evaluation of the Radiochemistry Quality Assurance Plan in compliance with requirements and WID Quality Assurance Program.	5 findings. Status: This assessment and related actions are closed.

WIPP ES&H ASSESSMENTS - CY 2000

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16.	MA-00-03	WID Procedure Compliance	WID QA	05/01/00 - 06/19/00	Assess the effectiveness of the document review process, determine the adequacy of WID procedures, evaluate the level of procedure compliance, and enhance awareness of management expectations associated with procedure compliance. Special activities included identification and correction of procedural inaccuracies, communication of expectations, and procedure use as it relates to employee safety.	Findings were all corrected during the course of the assessment. Status: This assessment and all related actions are closed.
17.	ECA00-004	WIPP Laboratory	WID QA ECAP	05/22/00 - 05/30/00	Evaluation of the implementation of Radiation Lab Requirements in compliance with Title 10 CFR, Part 835; DOE O 435.1-1; ANSI N13.30; and site-specific procedures.	5 findings. Status: This assessment and all related actions are closed.
18.	CI-00-05	Conduct of Operations	WID QA	05/23/00 - 06/08/00	Evaluation of the processes and activities associated with the conduct of operations as implemented in operations department drill programs, internal training evolutions, and facility inspections.	2 CARs. Status: This assessment and related actions are closed.
19.	S-00-05	WID Industrial Hygiene Program	CAO	05/30/00 - 06/08/00	Evaluate the adequacy, implementation, and effectiveness of the IS&H and OH programs. Special emphasis was placed on those area in which deficiencies were noted during Management Assessment 98IS03, conducted from July 20-24, 1998, and Surveillance S-97023, conducted in June 1997.	2 CARs. Status: This assessment and related actions are closed.

WIPP ES&H ASSESSMENTS - CY 2000

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20.	CI-00-08	Satellite Accumulation Area Management	WID QA	06/21/00 - 06/30/00	Evaluation of the processes and activities associated with the management of the hazardous waste in the Satellite Accumulation Areas and the compliance with procedures as implemented in those activities.	2 findings. Status: This assessment and related actions are closed.
21.	MA-00-05	WID Occupational Health Program	WID QA	07/27/00 - 08/03/00	Evaluate the effectiveness of the current occupational health program processes in meeting customer service expectations. This included a survey for trending purposes and an analysis of patient satisfaction, for preparation for American Association of Ambulatory Health Care accreditation.	No findings.
22.	A-00-14	WID QA Program	CAO	08/07/00 - 08/08/00	To Evaluate the adequacy, implementation, and effectiveness of selected elements of the WID QA Program.	No findings.
23.	S-00-07	Emergency Management Programs	CAO	08/21/00 - 08/24/00	To assess the adequacy and effectiveness of the emergency management program at the WIPP and to ensure compliance with applicable DOE standards, requirements, policies, and procedures.	No findings.
24.	100-09	Environmental Management System	WID QA	August 2000	Evaluation of the effectiveness of the WID Environmental Management System implementation in accordance with the WID Quality Assurance Program.	No findings.
25.	100-10	Volatile Organic Compound (VOC) Monitoring, ES&H	WID QA	August 2000	Evaluation of the implementation of the Quality Assurance Project Plan for Confirmatory VOC Monitoring.	2 findings. Status: This assessment and related actions are closed.

WIPP ES&H ASSESSMENTS - CY 2000

	ASSESSMENT #	ASSESSMENT TITLE	ORGANIZATION CONDUCTING ASSESSMENT	DATE	SCOPE	FINDINGS & STATUS
26.	ECA00-005	Environmental Compliance and Hazardous Waste Operations	WID QA ECAP	09/07/00 - 09/12/00	Evaluation of the implementation of Waste Characterization/Minimization Requirements in compliance with the applicable portions of Title 40 CFR, Parts 261,262, and 268; DOE O 5400.1; and Executive Order 13101.	1 finding. Status: This assessment and related actions are closed.
27.	100-11	ES&H Environmental Monitoring	WID QA	Sept. 2000	Evaluation of the Airborne Particulate Sampling program.	No findings.
28.		Voluntary Protection Program	WID ES&H Subcontract	November 2000	Review of the WID Safety and Health Program and effectiveness in meeting the requirements and expectations of a DOE VPP STAR site.	8 recommendations. Status: Corrective actions are currently in development and will be tracked through the site's commitment tracking system.