| EA Operational Awareness Record | Report Number: EA-WIPP-2016-05-17 |
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| Site: Waste Isolation Pilot Plant | Subject: Review of Past Findings |
| Dates of Activity: | Report Preparer: |
| 05/17/16 - 05/19/16 | Jeff Snook |

Activity Description/Purpose:

The U.S. Department of Energy Office of Environment, Safety and Health Assessments, within the independent Office of Enterprise Assessments (EA), Office of Nuclear Safety and Environmental Assessments (EA-31) reviewed past findings at the Waste Isolation Pilot Plant (WIPP) and their corrective actions. This review covered many EA-31 assessments and operational awareness reports since the February 2014 fire and radiological incidents. Conduct of engineering findings were not included.

Nuclear Waste Partnership, LLC (NWP) uses WIPP Forms to analyze, rate, process, and correct findings resulting from EA assessments and operational awareness reports, as well as other operations, maintenance, and safety issues. EA reviewed assessments and operational awareness reports, identified the findings, reviewed the applicable WIPP Forms, assessed the effectiveness of the corrective actions, interviewed the responsible NWP managers, and discussed the issues and results with the Carlsbad Field Office Operations Manager.

ATTACHMENTS: None.

Result:

The corrective actions for EA-31 findings reviewed were thorough and appropriate. The responsible managers were effective in analyzing the cause of the problem, identifying appropriate corrective actions, and implementing them. Some corrective actions were delayed, but eventually they were implemented after an extended period. The conduct of engineering findings will be reviewed by the EA-31 engineering subject matter expert at a later date.

When presented with a finding, the NWP WIPP Form committee, including the Quality Assurance Manager, bins the finding into one of four Action Levels: AL-1, 2, 3, or 4. Although conditions adverse to quality can be AL-1, 2, or 3, only ALs-1 and 2 receive an extent of condition review. Many of the WIPP Forms that EA reviewed were conditions adverse to quality; however, most were determined to be AL-3 by the WIPP Form committee and did not receive an extent of condition review, as allowed by the NWP procedure. Additionally, the extent of condition review for one condition rated as AL-2 was only performed against the applicable procedure rather than across the organization to see whether the condition was applicable across operational organizations. (**OFI-WIPP-01**)

OFI-WIPP-01: The NWP WIPP Form committee should consider reviewing any finding that is adverse to quality, determining whether it could apply across multiple organizations, and rate it at least as AL-2 to ensure it receives the appropriate extent of condition review.

| EA Participants | References (Key Documents, Interviews, and Observations) |
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| 1. Jeff Snook | All EA-31 WIPP assessments and operational awareness reports since February 2014. All WIPP Forms that addressed EA-31 findings. WP 15-GM1002, Revision 4, Issues Management Processing of WIPP Forms. Interviews with managers of all applicable WIPP Forms. |
| EA Follow-Up Items | None. |