

WP 10-WC3008

Revision 13

Facility Inspections

Management Control Procedure

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APPROVED FOR USE

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INTRODUCTION^{1, 2}

This procedure provides instructions for inspecting Waste Isolation Pilot Plant (WIPP) site facilities to identify and report deficiencies. Data contained in the inspection report can be used for estimating the cost of remediation. Condition Assessment Survey (CAS) Team personnel inspect, report the condition of, and request corrective action as needed for WIPP facilities and equipment.

Performance of this procedure generates the following records, as applicable. Any records generated are handled in accordance with departmental Records Inventory and Disposition Schedules.

- EA10WC3008-1-0, Facility Inspection Report
- EA10WC3008-2-0, RCRA Berm Inspection Report
- Condition Assessment Information System (CAIS) estimate for repair costs
- Work Order (WO) generated by the CHAMPS (Computerized History and Maintenance Planning System) maintenance planning system for preventive maintenance inspection on facilities
- Nonconformance Report

REFERENCES

BASELINE DOCUMENTS

- Title 30 *Code of Federal Regulations* (CFR) Part 57, Subpart N, "Personal Protection"
- DOE Order 420.1B, *Facility Safety*
- DOE Order 430.1B, *Real Property Asset Management*
- Hazardous Waste Facility Permit, Waste Isolation Pilot Plant, Permit No. NM4890139088-TSDF, issued by the New Mexico Environment Department

REFERENCED DOCUMENTS

- DOE Condition Assessment Survey Program Manuals
- WP 04-AD3011, Equipment Lockout/Tagout
- WP 10-WC3011, Maintenance Process

PREREQUISITE ACTIONS

- Conduct an annual self-evaluation of program.

PERFORMANCE

1.0 SCHEDULING

NOTE

Site Development personnel will identify changes to site buildings/facilities and report these to CAS personnel for evaluation for possible CHAMPS scheduling changes.

NOTE

As part of the Hazardous Waste Facility Permit (HWFP), the site's water diversion berms, located outside the site's secured area, are required to be inspected on an annual basis.

1.1 CAS Team, prepare a schedule of all CAS inspections that includes the following:

- Facilities/buildings
- Fixed ladders
- Underground electrical grounding
- Water diversion berms
- Waterlines

1.2 CAS Team, if a required inspection of Resource Conservation and Recovery Act (RCRA) berms becomes delinquent, perform the following:

1.2.1 Notify Site Environmental Compliance that an inspection is delinquent.

1.2.2 Schedule and complete the inspection.

1.2.3 Within five working days, document the following in a letter to Site Environmental Compliance:

- Schedule for inspection
- Reason(s) why inspection was not performed as initially scheduled

- Measures taken to offset negative impacts of delinquent inspection
 - Corrective actions taken to prevent further delinquencies
- 1.3 CAS Team, perform the following if notified by Facility Operations that a severe rain storm has occurred:
- 1.3.1 Schedule facility inspection of all RCRA berms to occur within 24 hours of notification.
 - 1.3.2 Perform inspection and document results on EA10WC3008-2-0.
 - 1.3.3 Inform Site Environmental Compliance of results of inspection within 24 hours.
- 1.4 CAS Team, notify Work Control Center personnel of required scheduling changes to be incorporated into CHAMPS in accordance with WP 10-WC3011.
- 1.5 Work Control Center, perform the following:
- 1.5.1 Input the inspection schedule into CHAMPS.
 - 1.5.2 When CHAMPS identifies facilities due for inspection, forward CHAMPS P-type WO sheet to the CAS Lead Inspector.
- 1.6 CAS Team, if lockout/tagout is required, verify the inspection is placed in the Plan-of-the-Day schedule at least three working days before the scheduled time of inspection.
- 2.0 PRE-INSPECTION PREPARATION
- 2.1 CAS Lead Inspector, perform the following as needed:
- 2.1.1 Acquire and review drawings, specifications, and inspection reports as needed for facility inspection.
 - 2.1.2 Review the following in the U.S. Department of Energy (DOE) CAS Program Manual as needed:
 - Inspection method guide sheets
 - List of deficiency factors for the type of facility being inspected
 - 2.1.3 Review CHAMPS as needed for status of WOs that were submitted as a result of previous inspections of the selected facility.

2.1.4 Review the following equipment/facility data in the Property Management System:

- Acquisition dates
- Initial costs
- Useful life span
- Replacement costs

2.1.5 Verify the following before beginning inspection (if required):

- Proper permits and authorizations (confined space entry, access to controlled radioactive areas, lockout/tagout, etc.) have been obtained from the Facility Shift Manager (FSM), and read.
- Facility Operations has been notified of required entry in the area.
- The proper number of locks have been obtained from maintenance (or assigned personal locks).
- Key(s) have been obtained from Facility Operations, or Facility Operations will provide entry.

NOTE

Personnel from the following groups make up the CAS Team, when applicable, and will participate in inspections:

- Engineering
 - Cognizant senior engineer, or designated alternate (**MUST** participate in RCRA berm inspections)
 - Operations
 - Industrial Safety
 - Environmental Monitoring and Hydrology
 - Site Environmental Compliance
 - Building landlord
 - Manager of group occupying facility
 - Quality Assurance (QA) (Suspect/Counterfeit Items Program)
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2.1.6 Periodically issue an inspection schedule to notify the inspection team of the following:

- Facility to be inspected
- Time
- Date

3.0 WORK RELEASE

NOTE

The "Cognizant Operations Manager (COM) Release" block is marked "Not Applicable" (N/A). If an inspection requires a lockout/tagout in accordance with the CHAMPS P-type WO, the WO must be released by the COM signing in the "COM Release" block before tags and locks are hung.

- 3.1 CAS Manager, sign the "ZMM Release" block (block 14) of the CHAMPS P-type WO to release the work.
- 3.2 CAS Inspector, if a lockout/tagout is required for inspection, obtain the Operations release signature in the "COM Release" block of the P-type WO.

3.3 Facility Operations, hang tags and locks in accordance with WP 04-AD3011.

4.0 INSPECTION PERFORMANCE

NOTE

Any discrepancies found as a result of the RCRA berm inspection must be annotated on EA10WC3008-2-0, Page 2.

4.1 CAS Team, perform inspections that include, but are not limited to, the following:

4.1.1 Inspect ditches, culverts, ponds, and RCRA berms for the following:

- Undesigned breaks
- Erosion
- Animal damage
- Vehicular damage
- Buildup of soil, vegetation, trash, etc., which may impede designed water flow

4.1.2 Inspect exposed electrical conduits for the following:

- Broken runs
- Loose fittings
- Any loose external grounding jumpers

4.1.3 Inspect accessible 120 VAC electrical outlets for:

- Damage
- Broken or missing plates
- Presence of, and proper functioning of, ground fault interrupter (GFI) receptacles where needed to comply with applicable requirements

4.1.4 Perform general inspection of buildings and facilities for electrical, mechanical, and structural deficiencies, including suspect/counterfeit parts.

4.1.5 Inspect for safe working conditions.

5.0 INSPECTION DATA PROCESSING

NOTE

Significant deficiencies are those which may affect safe or reliable facility operation, the HWFP, or which are suspect/counterfeit items.

5.1 CAS Lead Inspector, perform the following:

5.1.1 Identify significant deficiencies found during inspection in accordance with this procedure and the CAS Program Manuals.

- If any item is found to be an imminent danger, mitigation (barriers, lockout, etc) is required.

5.1.2 If a deficiency may affect safe or reliable facility operation, perform the following as applicable:

- Inform the cognizant person or organization, and **GO TO** Step 5.2.
- **GO TO** WP 10-WC3011, initiate and issue requests for corrective action as needed for potential safety and RCRA violations, and **RETURN TO** Step 5.2.

5.2 CAS Lead Inspector, prepare the applicable EA.

5.3 CAS Lead Inspector, verify the completed EA complies with the following:

- All inspection team members are identified in Inspection Team Members section.
- Cognizant Senior Engineer has signed Inspection Report for RCRA berm inspections.
- Component conditions are identified in Section I.
- Overall condition summary is identified in Section II.
- Deficiencies are identified in Section III, or a CAIS printout may be used.
- The EA is complete.

5.4 CAS Manager or designee, sign "Verification" block of Section II.

6.0 INSPECTION FIELD CLOSEOUT

- 6.1 CAS Lead Inspector, fill in the following blocks of the CHAMPS P-type WO:
- 6.1.1 Note work performed, and provide a summary of the condition in the "Overview of Work Performed" section.
- 6.1.2 If inspection did **NOT** require hanging of lockout/tagout tags, perform the following:
- [A] Enter "N/A" in the "COM Work Complete" block.
- [B] **GO TO** Step 6.3.
- 6.1.3 If inspection required hanging of lockout/tagout tags, forward CHAMPS P-type WO to Operations.
- 6.2 Operations, if inspection required hanging of lockout/tagout tags, sign "COM Work Complete" block of CHAMPS P-type WO to authorize removal of locks/tags.
- 6.3 CAS Manager, complete the following blocks of the CHAMPS P-type WO:
- 6.3.1 Enter "N/A" in the "COM Retest Complete" block.
- 6.4 Facility Restoration Scheduler (ZS), sign and date the designated block on the CHAMPS P-type WO.
- 6.5 CAS Lead Inspector, issue or distribute the following documents as indicated:
- The applicable EA and CHAMPS P-type WO to Work Control Center for filing in plant history records
 - Information copies (paper or electronic) of the applicable EA to Maintenance, CAS Manager, cognizant persons, and inspection team members, as needed
- 6.6 Responsible Organization, perform the following:
- 6.6.1 Note resolution (when completing the RCRA berm inspection report, note the disposition as issued on AR or record the date and nature of corrective actions) of each deficiency in the "Disposition" block of the applicable EA, Section III, Photo Sheet.

- 6.6.2 A copy of the completed CAS report is routed to the CAS Manager for review and to ensure an action is noted in the Disposition column of each finding. This copy is a record and is to be filed with the completed work order.

- 6.6.3 Return completed EA with dispositioned items to CAS Lead Inspector.