

**U. S. Department of Energy**  
**Carlsbad Field Office**

**TEAM PROCEDURE**

**CBFO TP 3.3, Rev. 0**

Effective: December 8, 2005

Expires: December 8, 2007

**SUBJECT: PROTOCOL FOR CBFO OBSERVERS AT BASELINE INSPECTIONS**

Quality Assurance Manager, Carlsbad Field Office: Signature on File

Date: 12/8/05

**1.0 PURPOSE**

The purpose of this procedure is to describe the protocol for Carlsbad Field Office (CBFO) Observers who are present during U.S. Environmental Protection Agency (EPA) Baseline Compliance Inspections (BCIs).

**2.0 SCOPE**

This procedure applies to all individuals designated by the CBFO to act as Observers during EPA BCIs.

**3.0 REFERENCES AND DEFINITIONS**

**3.1 References**

- DOE/CBFO-94-1012, *Quality Assurance Program Document (QAPD)*
- CBFO MP 4.9, *Quality Assurance Records*
- 40 CFR 194.8(b), *Waste Characterization Programs at Transuranic Waste Sites*

**3.2 Definitions**

- **Baseline Compliance Inspection** – EPA inspection performed to verify compliance of waste characterization programs and processes at transuranic (TRU) waste sites.
- **Inspector** – EPA representative tasked with the performance of BCIs.
- **Lead Inspector** – EPA Inspector assigned to direct the conduct of the BCI, and to interface with Observers.
- **Observer** – CBFO representative assigned to witness the BCI, and to interface with Inspectors.
- **Lead Observer** – CBFO representative assigned as an Observer, who serves as the focal point for other Observer concerns.

**4.0 RESPONSIBILITIES**

**4.1 CBFO Quality Assurance (QA) Manager**

- 4.1.1 Ensure that appropriate individuals are assigned as Observers during inspections.

- 4.1.2 Ensure that Observers receive appropriate training (including NQA-1 Auditor/Lead Auditor Training, familiarity with all applicable CBFO Quality Assurance management procedures, and this procedure).
- 4.1.3 Ensure that Observers understand their responsibility to immediately contact CBFO when they become aware of significant issues that are not resolved during BCIs.
- 4.2 Lead Observer
  - 4.2.1 In addition to fulfilling responsibilities as an Observer, serve as the contact point for other assigned Observers during the BCI and collect pertinent information provided by Observers.
  - 4.2.2 Contact the CBFO QA Manager daily, after each caucus meeting, and as deemed necessary.
  - 4.2.3 Prepare a Summary Report after conclusion of the BCI, summarizing daily inspection activities and results.
- 4.3 Observer
  - 4.3.1 Attend formal inspection meetings held by the EPA.
  - 4.3.2 Witness the inspection.
  - 4.3.3 Provide a daily summary of inspection activities to the CBFO QA Manager (or to the Lead Observer when one is designated).
  - 4.3.4 Prepare a Summary Report describing daily inspection activities and results after conclusion of the BCI (when no Lead Observer has been designated).

## **5.0 PROCEDURE**

- 5.1 Scheduling Observer(s) to Participate in a BCI
  - 5.1.1 The CBFO QA Manager may designate one or more Observers to participate in the BCI. When more than one Observer is assigned, one individual will be designated Lead Observer.
  - 5.1.2 The CBFO QA Manager will ensure that designated Observers will coordinate with the appropriate EPA technical or QA personnel to obtain information pertinent to the BCI, such as schedule and scope.
- 5.2 Preparation for BCI
  - 5.2.1 Observers will become familiar with BCI scope and related procedures prior to the inspection. Questions regarding the BCI scope will be directed to the CBFO QA Manager prior to the EPA conference call noted below.
  - 5.2.2 Observers will participate in a conference call scheduled by the EPA with the EPA, CBFO, and TRU waste site personnel, to discuss the inspection schedule and any other relevant issues.
- 5.3 Observer Conduct During the BCI
  - 5.3.1 Prior to the BCI, Observers shall:

- A. Attend the EPA pre-inspection conference
  - B. Become familiar with Inspector checklists provided at the beginning of the BCI
- 5.3.2 Observers shall witness the inspection, noting areas of concern.
- 5.3.3 Unless prohibited by the EPA, Observers shall attend inspection team caucus meetings, providing input only when asked.
- 5.3.4 Observers shall refrain from acting as part of the inspection team, and shall ensure that behavior is not construed to be interference with the inspection process.
- 5.3.5 Observers shall neither defend nor disagree with any responses or evidence provided by the TRU waste site, or any conclusions reached by the Inspectors.
- 5.3.6 Observers shall respond to Inspector requests for additional information, such as past audit results or CBFO requirements, by contacting the CBFO QA Manager.
- 5.3.7 Observers shall attend the EPA close-out meeting.
- 5.4 Contacting the CBFO QA Manager
- 5.4.1 After consulting with the BCI Lead Inspector, the Observer shall contact the CBFO QA Manager when:
    - A. It appears that the Lead Inspector has misconstrued information gathered during the inspection
    - B. The Lead Inspector has complaints regarding the conduct of the BCI
    - C. The Observer becomes aware of significant issues raised by the inspection team
  - 5.4.2 The Observer may contact the CBFO at any time deemed necessary.
- 5.5 Documentation of BCI Activities
- 5.5.1 The Observer shall prepare a Summary Report, documenting the following:
    - A. Individuals in attendance during inspection activities
    - B. A summary discussion of observed activities, discussions, objective evidence reviewed, and other pertinent information. The summary will provide a general overview or synopsis of activities, and is not a detailed inspection report.
  - 5.5.2 The Summary Report shall include as attachments copies of draft reports or findings provided by Inspectors.

## 6.0 **RECORDS**

No quality assurance records are generated by this procedure.