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**Los Alamos**  
 NATIONAL LABORATORY  
**memorandum**  
 Environmental Restoration Project  
 EM/ER, M992

To: MS Jorg Jansen, EM/ER, MS M992  
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 Phone/FAX 5-0470/5-4747  
 Symbol EM/ER.96-627  
 Date December 17, 1996

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**SUBJECT: ER PROJECT QUALITY ASSURANCE PROGRAM**

I was recently provided a copy of several pages from a document entitled "Waste Acceptance, Characterization, and Certification Program" (attached), which defined Quality Assurance (QA) Program requirements for waste generators. The effective date identified on this document is 1/1/97. The document requires waste generators to have a quality assurance program consistent with Department of Energy (DOE) Order 5700.6C, 10 CFR 830.120, with applicable requirements of ANSI NQA-1, and other QA requirements identified in treatment storage and disposal permits. This document also provides performance requirements for data and data review.

Some of these requirements are the same as those required by the University of California contract for operation of the Los Alamos National Laboratory (DOE Order 5700.6C and 10 CFR 830.120). These are also the same QA program requirements that apply to the "no further action" decision-making process we use for potential release sites. As it stands today, I do not think we meet a significant portion of these requirements. We currently do not have a written program that meets 5700.6C or 10 CFR 830.120. Since we do not have a program, it is difficult to say we implement such a program. I have attached a sheet listing the criteria from 5700.6C and comments identifying whether the ER Project meets the criteria or not.

What are the implications of not meeting these program requirements? In a recent situation, Larry Maassen and Stephanie Stoddard have been trying to apply for use of the DOE Oak Ridge Toxic Substances Control Act (TSCA) incinerator to burn ER waste. One of the incinerator requirements is that the waste generator (ER) has a well-rounded QA program that meets the types of criteria identified in 5700.6C. Because we do not meet these requirements, we may not be able to qualify for use of the incinerator. The same situation could occur with Waste Management. If Waste Management were to verify, or ask for verification, that we meet the requirements stated in the attached Waste Acceptance, Characterization, and Certification Program document and found we do not meet these requirements, they could refuse to accept any ER waste! This is a real possibility that the ER Project Management must address.

I have tried to bring the lack of a viable QA program to the attention of the ER Project Management Team. With the pressures to meet DOE performance objectives and budget problems, no emphasis was placed on the lack of a QA program. Now that the lack of a QA program may affect the ER Project's ability to dispose of waste, I think the QA program issue can no longer be deferred.

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CLEAN UP LOS ALAMOS...  
faster, better, cheaper!



# Waste Acceptance, Characterization, and Certification Program

Los Alamos National Laboratory  
Laboratory Implementation Requirements LIA404-00-01.0  
Effective Date: 01/01/97

The Waste Generator Division Directors shall establish and implement a program of self-assessment to identify nonconformances, inefficiencies, and potential problems. Self-assessments shall be performed at least annually.

When deemed necessary, Waste Generator Division Directors shall request additional audits or evaluations to augment their self-assessment program.

## 7.1.10 Exemptions/Exceptions

Individual Waste Generator and/or Organizations shall submit to the TSDFs any requests for exemptions/exceptions from the requirements of this standard or the TSDF WAC.

Exemptions/Exceptions shall not be granted if they conflict with DOE, DOT, EPA, New Mexico Environment Department (NMED), other applicable government agency regulations, or RCRA permits.

Exemptions/Exceptions shall be documented and incorporated into the Waste Generator Organization's GWCP.

## 7.1.11 Waste Forecasts

**NOTE:** Waste forecasts are required by DOE for use in the Integrated Database and the Baseline Environmental Management Report.

Volume projections shall be provided to each TSDF (for the waste applicable to that TSDF) at least annually.

The TSDF requesting information shall provide each Division Director or designee with a questionnaire describing the information needs and time requirements for providing the volume forecasts. TSDFs shall allow Division Directors at least 30 days to prepare the forecasts.

For waste destined for the RLWTF, the estimated volume of liquid shall be recorded on the WFF.

When appropriate, facilities or divisions failing to provide the required information in a timely manner shall be barred from transferring waste to the applicable TSDF.

Waste Generator Organization's shall update volume projection data whenever a significant change in waste volume is anticipated.

# ER QUALITY PROGRAM

5700.6C CRITERIA	COMMENTS
<b>(1) Management</b>	
<b>Criterion 1--Program</b>	
Organizations shall develop, implement, and maintain a written Quality Assurance Program. The QAP shall describe the organizational structure, functional responsibilities, levels of authority, and interfaces for those managing, performing, and assessing adequacy of work.	The ER Project has not maintained or implemented a QAP. As a result the other items identified for this criterion have not been met. While a document, "QAPP requirements for SAPs." (signed by all management team members) incorporates many of the cited elements, it is a second tier document to a QAP and does not address all the elements. Support and funding for the QAPP document is also questionable.
The QAP shall describe the management system, including planning, scheduling, and cost control considerations.	Since a current QAP does not exist, this criterion is not met.
<b>Criterion 2--Personnel Training and Qualification</b>	
Personnel shall be trained and qualified to ensure they are capable of performing their assigned work.	ER does have a procedure, AP 5.2, which addresses some qualifications and training. It is limited in scope and does not address all areas necessary.
Personnel shall be provided continuing training to ensure that job proficiency is maintained.	This is only the case in a limited number of areas, primarily HAZWOPER, RADWORKER, or other training required by LANL
<b>Criterion 3--Quality Improvement</b>	
The organization shall establish and implement processes to detect and prevent quality problems and to ensure quality improvement.	ER has no program or system for meeting this criterion. There is little acceptance or conformance checking done throughout the project. There is rarely a benchmark for measurement, thus one can not measure or see improvement.
Items and processes that do not meet established requirements shall be identified, controlled, and corrected.	ER has no program or system for meeting this criterion. See above.
Correction shall include identifying the causes of problems and preventing recurrence.	ER has no program or system for meeting this criterion. See above.

## ER QUALITY PROGRAM

5700.6C CRITERIA	COMMENTS
Design work, including changes, shall incorporate applicable requirements and design bases.	Not consistently applied or defined in the ER Project. Example is work done by Earth Science Council.
Design interfaces shall be identified controlled.	Not consistently implemented or defined in the ER Project.
The adequacy of design products shall be verified or validated by individuals or groups other than those who performed the work.	Not consistently implemented or defined in the ER Project.
Verification/validation work shall be completed before approval and implementation of the design.	Not consistently implemented or defined in the ER Project.
<b>Criterion 7--Procurement</b>	
The organization shall ensure that procured items and services meet established requirements and perform as specified.	Not consistently implemented or defined in the ER Project
Prospective suppliers shall be evaluated and selected on the basis of the specified criteria.	Not consistently implemented or defined in the ER Project
The organization shall ensure that approved suppliers can continue to provide acceptable items and services.	Not implemented or defined in the ER Project. There has been <u>no</u> support for evaluating the performance of analytical laboratories or field teams.
<b>Criterion 8--Inspection and Acceptance Testing</b>	
Inspection and acceptance testing of specified items and processes shall be conducted using established acceptance and performance criteria.	Not always addressed, supposed to be in plans. Inadequate for analytical data, funding insufficient.
Equipment used for inspections and tests shall be calibrated and maintained.	Not always addressed, supposed to be in plans.