

United States Government

Department of Energy

memorandum**Carlsbad Area Office
Carlsbad, New Mexico 88221**

June 14, 2000

DATE:
REPLY TO
ATTN OF:

CAO:NTP:RRS:NM 00-1103 UFC 5822.00

SUBJECT:

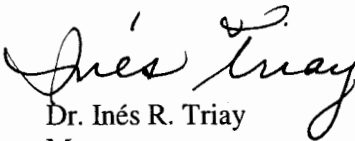
Authority for Certification and Characterization of Debris Waste.

TO:

Ms. Beverly Cook, Manager, Idaho Operations Office

The Carlsbad Area Office (CAO) has completed an evaluation of the Idaho National Engineering and Environmental Laboratory (INEEL) programs for quality assurance, transportation, characterization, and certification of defense transuranic (TRU) retrievably stored debris waste. The characterization systems and processes evaluated were the non-destructive assay (NDA) process, real-time radiography (RTR) system, acceptable knowledge (AK) process, headspace gas (HSG) process, and visual examination (VE) process. Based on this evaluation (see attachment 1), the CAO is satisfied that these activities meet all the requirements of the Hazardous Waste Facility Permit, the *Waste Acceptance Criteria for the Waste Isolation Pilot Plant*, the *Quality Assurance Program Document*, and other CAO requirements and standards.

The INEEL transportation and waste certification authority is limited to those systems and processes evaluated during audit A-00-06 conducted April 24-28, 2000. Attachment 2 contains a complete list of the procedures that were evaluated. TRU waste characterization, certification, or transportation using significantly revised or new processes and systems must be evaluated by CAO prior to their implementation. NMED approval will be required prior to initial shipment. CAO will notify INEEL when approval has been obtained.


Dr. Inés R. Triay
Manager

Attachments

cc: w/attach
B. Stroud, CAO
S. Vega, CAO
K. Watson, CAO
C. Zvonar, CAO
J. Wells, DOE/ID
L. Fritz, DOE/ID
T. Monk, INEEL
D. Murphy, INEEL
S. Kouba, WID
S. Monroe, EPA
S. Zappe, NMED
L. Greene, CTAC
S. Calvert, CTAC



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INEEL SITE CERTIFICATION PROGRAM STATUS

The site certification panel evaluated the documentation supporting the compliance of INEEL's TRU waste quality assurance, transportation, characterization, and certification activities. The panel unanimously recommends that INEEL be granted authority to transport, characterize, and certify retrievably stored debris waste. The following systems and/or processes are approved: non-destructive assay (NDA) system, real-time radiography (RTR) system, acceptable knowledge (AK) process, headspace gas (HSG) process and visual examination (VE) process. The quality assurance program was found to be effectively implemented. See attachment 2 for a complete list of procedures that were evaluated during audit A-00-06.

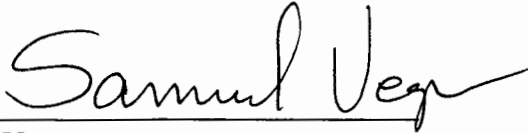
STATUS

- All necessary program elements have been determined to be complete
- The following INEEL required site documents have been revised, approved, and are in place identifying how the site complies with the WIPP Hazardous Waste Facility Permit WAP, CAO QAPD, and WIPP WAC requirements:
 - ❑ WCP – *Program Plan for Certification of INEEL Contact-Handled Stored Transuranic Waste*, PLN-579, Rev. 1, May 18, 2000
 - ❑ QAPjP – *Quality Assurance Project Plan for the Transuranic Waste Characterization Program*, PLN-190, Rev. 5, May 18, 2000
 - ❑ QAP – *Plan for INEEL TRU Waste Characterization, Certification, and Transportation Quality Program*, PLN-182, Rev. 5, May 18, 2000
 - ❑ TRAMPAC and QA PLAN – *TRUPACT-II Authorized Methods for Payload Control (TRAMPAC) Compliance Plan*, PLN-577, Rev. 0, March 14, 2000
 - ❑ Packaging QA Plan (Section 5.3.1 of WCP)
 - ❑ Graded Approach Procedure – *Graded Approach and Quality Level Assignment*, MCP-540, Rev. 9, August 26, 1999
 - ❑ Procedures Matrix – *INEEL TRU Waste Program Procedures Matrix*, PRD-198, Rev. 5, April 27, 2000
 - ❑ Standard operating procedures (see attachment 2 for complete procedure list)
- INEEL successfully participated in the following performance demonstration programs (PDPs):
 - ❑ NDA PDP participation cycle 6B (report dated November, 1999 and conditional approval letter, CAO:NTP:MRB 00-0510 UFC 5822, dated January 24, 2000)
 - ❑ RCRA PDP participation cycle 6A (report dated October, 1998)
 - ❑ HSG PDP participation cycle 14A (Report not yet distributed. Approval letter CAO:NTWP:MRB 00-0588 UFC 5822, dated May 9, 2000)
- CAO conducted audit A-00-06 (April 24-28, 2000) and returned on May 17, 2000 to close all associated CARs. This audit determined that the processes, documentation, and procedures listed in attachment 2 are adequate and effectively implemented.
- CARs issued during audit A-00-06 were successfully implemented and closed during the May 17, 2000 visit. No significant CARs remain open.

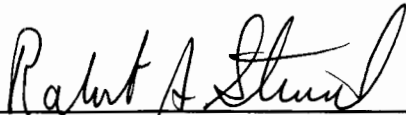
RECOMMENDATION

The panel recommends that the CAO Manager grant INEEL authority to characterize, certify and transport TRU retrievably stored debris waste. It is also recommended that this authority be limited to those systems and processes audited during audit A-00-06.

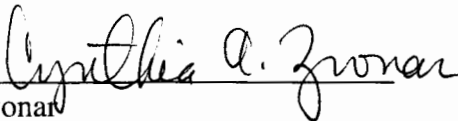
CONCURRENCE



Sam Vega
Quality Assurance Team Leader



Robert A. Stroud
National TRU Program Team Leader



C. Zvonar
Acting Assistant Manager
Regulatory Compliance

INEEL PROCEDURES AUDITED IN A-00-06

NUMBER	PROCEDURE NUMBER	TITLE
1.	ACLP 4.10	Determination of Method Detection Limits for Gas Analysis
2.	ACLP 4.20	Sample and QA Nomenclature Conventions for TWCP
3.	ACLP 4.25	Sample Receiving, Custody, and Storage
4.	ACLP 4.30	Standards Preparation, Documentation and Storage
5.	ACLP 4.40	Summa Canister Cleaning
6.	ACLP 4.45	Gas Transfer Manifold Systems
7.	ACLP 4.50	Equipment Maintenance
8.	ACMM-9910	Analysis of Gas Samples for Alcohols and Ketones by GC/FID
9.	ACMM-9920	Analysis of Gas Samples for Hydrogen/Methane by GC/TCD
10.	ACMM-9930	Analysis of Gas Samples for VOCs by GC/MS
11.	EDF-363	SWEPP Certified Waste Sampling Plan
12.	HFEF-OI-6810	Transuranic Report Inventory Processing System
13.	HFEF-OI-6890	Waste Characterization
14.	MCP-196	Assessor/Lead Assessor Qualification
15.	MCP-553	Stop Work Authority
16.	MCP-538	Control of Nonconforming Items
17.	MCP-540	Graded Approach & Quality Level Assignment
18.	MCP-590	Procurement Quality Requirements
19.	MCP-591	Evaluated Supplier Program
20.	MCP-592	Acquisition of Goods and Services
21.	MCP-598	Process Deficiency Resolution
22.	MCP-1755	TRU Project Control and Implementation of WIPP Requirements
23.	MCP-1757	Management Assessments for TWCP
24.	MCP-1783	TRUPACT II Container Maintenance Program
25.	MCP-1785	TRIPS Data Management
26.	MCP-1800	Contact Handled Waste Certification
27.	MCP-1803	Configuration Control of RWMC Hardware/Software
28.	MCP-1805	Document Preparation, Review, Control, and Release
29.	MCP-1815	RWMC/SWEPP Level I Data Validation
30.	MCP-1819	TRUPACT II Receipt, Inspection, and Shipment
31.	MCP-2001	Control of Analytical Methods and Procedures
32.	MCP-2006	Analytical Lab Dept Training and Qualification Program
33.	MCP-2008	Analytical Data Recording, Review and Reporting
34.	MCP-2009	Analytical Software Control
35.	MCP-2011	Analytical Logbooks
36.	MCP-2391	Calibration Program
37.	MCP-2489	Supplier Surveillance
38.	MCP-2492	Standards and Calibration Lab Operations
39.	MCP-2502	Standards and Calibration Lab Calibration Intervals
40.	MCP-2517	Data Flow and Reporting
41.	MCP-2518	Duties of INEL Site Personnel
42.	MCP-2519	Project Files
43.	MCP-2520	QA Records Management
44.	MCP-2521	Site Project Data Base
45.	MCP-2527	DQO Reconciliation at SPO Level
46.	MCP-2528	Computer Software Control
47.	MCP-2532	Independent Assessment
48.	MCP-2533	Reports to Management
49.	MCP-2534	Level I Surveillances

INEEL PROCEDURES AUDITED IN A-00-06		
NUMBER	PROCEDURE NUMBER	TITLE
50.	MCP-2535	Level II Data Processing by the SDVO
51.	MCP-2537	Activities Conducted by the SDVO
52.	MCP-2542	Preparation of Waste Profile Forms
53.	MCP-2544	WWIS Data Transfer
54.	MCP-2546	Visual Examination Process
55.	MCP-2988	Confirmation, Resolution, and Re-evaluation of Acceptable Knowledge Information
56.	MCP-2989	Collection, Review, and Management of Acceptable Knowledge Documentation
57.	MCP-2990	Radioassay Total Uncertainty Process Using Modified Statistical Sample Approach
58.	MCP-2991	Radioassay Total Uncertainty Process Using Statistical Sampling Approach
59.	MCP-2992	QA Program Surveillances
60.	MCP-2993	TWCP Action Tracking and Trend Analysis
61.	MCP-2995	Project Level Electronic Data V and V By the SDVO
62.	MCP-2996	Electronic Data Review By the SDVO
63.	MCP-2997	SQAO Electronic Data Review Checklists
64.	MCP-3491	Acceptance of Procured Items and Services
65.	NT-AP-01	Documents and Records Management
66.	NT-AP-03	ANL-W TWCP Data Generation Level Review
67.	NT-AP-04	QA Requirements Implementation
68.	NT-AP-05	TWP Training Plan
69.	NT-AP-08	TWCP Data Input and QA Release for TRIPS
70.	NT-AP-09	TWCP VEE Functions and Process
71.	PLN-182	INEEL TRU Waste Characterization, Certification, and Transportation Quality Program (QPP)
72.	PLN-190	Quality Assurance Project Plan (QAPjP)
73.	PLN-577	TRUPACT II Authorized Methods for Payload Control Compliance Plan (TRAMPAC)
74.	PLN-579	Program Plan for Certification of INEEL Contact-Handled Stored Transuranic Waste (Certification Plan)
75.	PLN-582	TRIPS Software Configuration Management Plan
76.	PLN-583	TRIPS Software QA Plan
77.	PLN-584	TRIPS Software Verification and Validation Plan
78.	PLN-585	TRIPS Software Test Plan
79.	PLN-587	Training Implementation Plan for TWCP
80.	PLN-600	Analytical Laboratory Department QA Plan for the TWCP
81.	QTP-002	RTR System
82.	QTP-004	Qualification Test Procedure (PAN)
83.	QTP-011	Qualification Test Procedure (SGRS)
84.	QTP-021	RTR Digital Video Encoding Test
85.	TPR-1572	Operating the RTR System
86.	TPR-1573	PAN Drum Assay System
87.	TPR-1576	SWEPP Weight Station
88.	TPR-1584	Drum Venting Operations
89.	TPR-1588	Gamma Ray Spectrometer System
90.	TPR-1625	WMF-635 Dispositioning and Container Integrity
91.	TPR-1632	Transportation Certification Using TRIPS
92.	TPR-1642	Needle Assembly
93.	TPR-1648	TRUPACT II Payload Assembly

INEEL PROCEDURES AUDITED IN A-00-06

NUMBER	PROCEDURE NUMBER	TITLE
94.	TPR-1649	TRUPACT II Loading
95.	TPR-1652	Helium Leak Detector
96.	TPR-1719	Calibration of Gamma Assay/System
97.	TPR-1728	Manual Gas Sampling
98.	TPR-4960	Receiving Inspections