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CERTIFIED MAIL - RETURN RECEIPT REQUESTED

June 20, 2000

Dr. Inés Triay, Manager
Carlsbad Area Office
Department of Energy
P. O. Box 3090
Carlsbad, New Mexico 88221-3090

Mr. Joe Epstein, General Manager
Westinghouse Waste Isolation Division
P.O. Box 2078
Carlsbad, New Mexico 88221-5608

**RE: DESCRIPTION OF THE PROCESS USED TO REVIEW PREEXISTING RTR
AND VE DATA AT HANFORD
EPA I.D. NUMBER NM4890139088**

Dear Dr. Triay and Mr. Epstein:

On May 1, 2000, NMED received the Final Audit Report of the Hanford Site, Audit Number A-00-05 (**Audit Report**), from the Department of Energy's Carlsbad Area Office (**CAO**). CAO and Westinghouse (**the Permittees**) were required to submit this Audit Report under the Waste Isolation Pilot Plant (**WIPP**) Hazardous Waste Facility Permit as specified in Permit Condition, II.C.2.c.

On June 7, 2000, CAO submitted the "Description of the Process Used to Review Preexisting RTR (real time radiography and) and VE (visual examination) Data at Hanford" to supplement the information within the Audit Report. NMED believes that although evaluation of pre-existing data for WAP compliance is a necessary activity to ensure best use of data generated prior to the effective date of the WIPP WAP, review and approval of this data is inappropriate for the review of the Audit Report. Following discussions with your staff, NMED received a request to review and respond to CAO's determination that real-time radiography and visual examination data collected at the Hanford site prior to the effective date of the WAP now meets the requirements of the WAP.

Attached are NMED's comments based upon review of the "Description of the Process Used to Review Preexisting RTR and VE Data at Hanford." These comments address the process and procedures necessary for approval of the Audit Report to ensure compliance with the WIPP WAP.

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Dr. Triay and Mr. Epstein

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If you have any questions regarding this matter, please contact me at (505) 827-1758.

Sincerely,



Gregory J. Lewis

Director

Water and Waste Management Division

Attachment

cc: James Bearzi, NMED HRMB
John Kieling, NMED HRMB
Steve Zappe, NMED HRMB
Susan McMichael, NMED OGC
Tom Fitzsimmons, Director, WA Dept. of Ecology
David Neleigh, EPA Region 6
Mary Kruger, EPA ORIA
Connie Walker, TechLaw
Don Hancock, SRIC
Joni Arends, CCNS
File: Red WIPP '00

**REVIEW OF “DESCRIPTION OF THE PROCESS USED TO
REVIEW PREEXISTING RTR AND VE DATA AT HANFORD”**

The DOE seeks approval of the reassessment process used to evaluate whether approximately 100 Hanford non-mixed PFP containers, examined by VE/RTR prior to the effective date of the WAP, can be reassessed to demonstrate WAP compliance. TAB PE and Section 5.2.7 of the Hanford Audit Report includes brief discussion of the VE, RTR and Training information reviewed to reassess whether preexisting data can be qualified to WAP requirements. DOE recently provided an additional document entitled “Description of the Process Used to Review Preexisting RTR and VE Data at Hanford” (Description) to supplement the Hanford Audit Report. Evaluation of all these documents provided has been performed. The following shall be addressed through revision of the Description.

- **Reassessment Process:** The Description referenced WMC 400, 1.3.1 for the specific process followed, stating that “due to the one-time nature and limited duration of the activity, a separate procedure to perform this review was not required”. It is difficult to approve a process when no procedure documenting the process was developed, so the Description must document reassessment activities as thoroughly as possible. Additional information shall be provided which, for example, details how the reassessment was performed, data examined, assessment criteria, and problems encountered (i.e. reassignment of drums to different waste streams during the reassessment process, etc.)
- **Scope of Reassessment:** The Report does not completely detail how the specific reassessment process was derived. For example, because the reassessment was to determine preexisting data WAP compliance, it is assumed that WAP elements (i.e. the B6 checklist) were compared against procedures and activities. Revise the Description to present a brief overview discussion about how the reassessment process proceeded (e.g. assessed entire programmatic elements and determined analytical processes and associated procedures that needed to be reassessed, identified container population, determined review process). Also, while it is agreed that it was appropriate to reassess the specific RTR and VE examined, it is unclear how other procedures or procedure revisions were considered. For example, there is at least one procedural revision “between” the two RTR procedures assessed (i.e. Rev D-4 and E-2 were evaluated).

Additional summary information in the description would also better capture the reassessment process. For example, summarize, in a table or list, the effective period of the specific revision assessed, and containers examined during that period which would be subject to a given procedure. Correspondence included in TAB PE1, dated February 11, 2000, states that “specific directions were provided for completion of NDE and VE data reviews”. It is assumed that correspondence in TAB PE1 are complete descriptions of direction provided; if not, provide this information. Include the Corrective Action Plan as an Attachment if this Plan provides additional information about the reevaluation process.

- **Integration of Training Requirements:** It is unclear whether on the job (OJT) training was also re-performed to ensure those reviewing the preexisting data were trained in

accordance with the WAP. It is also unclear whether all necessary WAP required training related to RTR/VE was assessed.

- Reassessment Documentation: The specific forms used to reassess data shall be included on a drum by drum basis. Sheets included in TAB PE are summary in nature, and the same summary sheet was xeroxed and placed with each drum package. Instead, the individual drum comparison sheets should have been included, with a single copy of the summary sheet for the batch report. RTR/VE video comparison documentation shall be provided, as well as summary information addressing the drum reassignments made based on re-assessment.
- VE Data Review Process: PE Tabs shall clearly indicate whether VE tapes were reviewed and to identify those VE tapes reviewed. Also, indicate whether the tapes were examined for all necessary prohibited items (i.e. the addendum VE log and original VE logs in TAB PE3 pre-existing data packages do not document whether the presence of pyrophorics, explosives, incompatible items, and asbestos were determined during either the original or VE reassessment process). The VE addendum log also only requires verification of the Waste Matrix Code Group (WMCG), but the WAP requires verification of an individual Waste Matrix Code (WMC). Changes made to VE logs in TAB PE must be better explained (e.g. assignment of TRUCON codes). It is also unclear whether parameter weight tables were used in conjunction with Rev. B-0 implementation and would, hence, require reassessment. Also, Revision B-0 did not address estimation of liquid content in non-transparent containers; it is unclear whether this element was adequately considered during reassessment.
- RTR Data Review Process: No individual container Data Review Sheets (other than hand-edited Radiography Data Sheets) are provided to indicate that, on a container basis, prohibited items were assessed. Hand edits were sometimes of poor copy quality, and it is not possible to tell whether individual container reassessment was made based on both tape and written information. As with VE, the WAP requires verification based on WMC, not WMCG; procedures state verification occurs on the WMCG.

Revise the "Description of the Process Used to Review Preexisting RTR and VE data at Hanford (June 8, 2000) to address the above concerns. Also revise one RTR batch report WR-TB-1999-59) and the one VE batch report in PE 3 to include additional drum-specific information as appropriate.