

United States Government

Department of Energy

memorandum

Carlsbad Area Office
Carlsbad, New Mexico 88221

DATE: August 14, 2000

**REPLY TO
ATTN OF:** CAO:QA:SAV:NM 00-0852 UFC 2300.00

SUBJECT: Review of Documents for Audit (A-00-12) of Rocky Flats Environmental Technology Site (RFETS) TRU Waste Characterization of Homogenous Solid Waste

TO: Joseph A. Legare, Assistant Manager for Environment and Compliance

The Carlsbad Area Office (CAO) has completed a review of the following documents and concur with the responses to the comments:

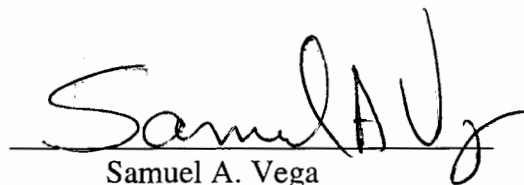
- 95-QAPjP-0050, Revision 4, DCF-CHG-01 and DCF-CHG-02 Rocky Flats Environmental Technology Site TRU Waste Characterization Program Quality Assurance Project Plan
- 1-MAN-008-WM-001, Revision 4, Transuranic (TRU) Waste Management Manual
- RS-020-001, Revision 2, Gas Generation Testing Program Quality Assurance Project Plan
- PRO-486-WIPP-006, Revision 1, TRU Waste Characterization Project Quality Assurance Grading

CAO approval of these documents is granted. The signed approvals are attached.

If you have any questions or comments please contact me at 505-234-7423.



Robert A. Stroud
National TRU Waste Program
Team Leader



Samuel A. Vega
Quality Assurance Manager

Attachment



Printed on recycled paper

000829



Legare

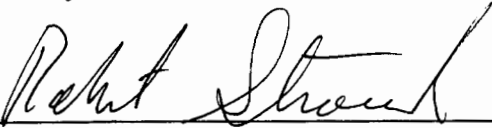
- 2 -

cc w/attach
CAO QA File
B. Stroud, CAO
C. Zvonar, CAO
K. Watson, CAO
T. Harms, DOE-HQ
M. Eagle, EPA
S. Monroe, EPA
S. Zappe, NMED
B. Walker, EEG
D. Winters, DNFSB
C. Ferrera, RFETS
J. O'Leary, RFETS
T. Bowden, CTAC
C. Riggs, CTAC
W. Most, WID



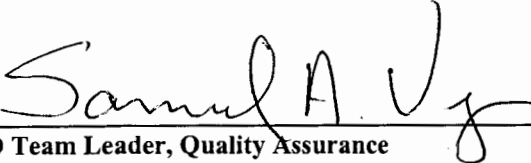
APPROVALS

Approved by:



CAO Team Leader, National TRU Waste Program

2/14/00
Date



CAO Team Leader, Quality Assurance

8/14/00
Date

DOE Field Office (J. Legare)

Date

Kaiser-Hill Waste & Remediation Operations (A. D. Rogers)

Date

RFETS TWCP Project Manager (G. A. O'Leary)

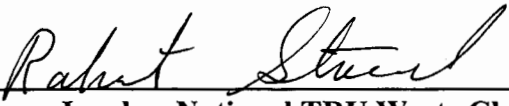
Date

RMRS Quality Assurance (M. Castagneri)
(RFETS TWCP Project Quality Assurance Officer)

Date

APPROVALS

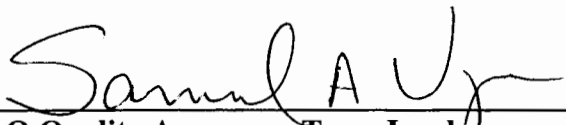
Approved by:



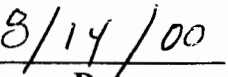
CAO Team Leader, National TRU Waste Characterization Program
(R. A. Stroud, Acting Manager)



Date



CAO Quality Assurance Team Leader
(S. Vega)



Date

DOE Rocky Flats Field Office
(J. A. Legare)

Date

KH Material Stewardship, Waste Management, Technical Programs
(G. A. O'Leary, TWCP Site PM)

Date

KH Material Stewardship, ESH&Q, Quality Assurance
(C. L. Ferrera, TWCP Site PQAO)

Date

Rocky Flats Environmental Technology Site

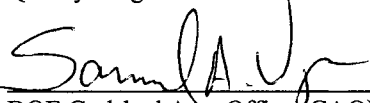
PRO-486-WIPP-006

REVISION 1

TRU WASTE CHARACTERIZATION PROJECT QUALITY ASSURANCE GRADING

APPROVED BY: _____ / G. A. O'Leary / _____
Manager, TRU Waste Programs / Print Name / Date

APPROVED BY: _____ / J. Jeffries / _____
DOE RFFO, Division Director, / Print Name / Date
Quality Programs Division

APPROVED BY:  / S. A. Vega / 8/14/00
DOE Carlsbad Area Office (CAO) / Print Name / Date
Quality Assurance Manager

Effective Date: _____

CONCURRENCE BY THE FOLLOWING DISCIPLINES IS DOCUMENTED IN THE DOCUMENT HISTORY FILE:

- Building 371 Quality and Compliance Program
- Building 707 Closure Project Quality Assurance
- Material Stewardship Waste Quality Assurance
- Residue Program
- Site Quality Assurance
- TRU Waste Programs

USE CATEGORY 3

This procedure SHALL be available at a known location for reference.

ISR review not required.

SES review not required.

Reviewed for Classification/UCNI

By: _____


This procedure supersedes PRO-486-WIPP-006, Rev. 0

Date: _____

Periodic review frequency: 1 year from the effective date.

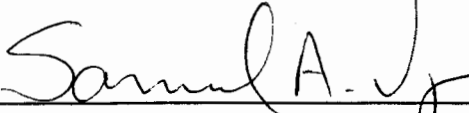
APPROVALS

Approved by:



CAO Team Leader, National TRU Waste Program
(Robert A. Stroud, Acting Manager)

Date



CAO Team Leader, Assurance (Samuel Vega)

8/14/00

Date

DOE Rocky Flats Field Office (J. Legare)

Date

RFETS Kaiser-Hill TRU Waste Management Technical
Programs Manager (G. A. O'Leary)

Date

RFETS Kaiser-Hill TRU Waste Quality Assurance Officer
(C. L. Ferrera)

Date

CARLSBAD AREA OFFICE

Sheet 1 of 2

DOCUMENT REVIEW RECORD

DOCUMENT TITLE: Gas Generation Testing Program Quality Assurance Project Plan

DOCUMENT NUMBER/REVISION: RS-020-001/Revision 2

DOCUMENT DATE: MM/dd/00

TYPE OF REVIEW: Quality Assurance/Technical

ASSIGNED REVIEWER: Samuel A. Vega

DELEGATED REVIEWER: CTAC

ADDITIONAL INSTRUCTIONS:

FORWARD RESULTS TO:

COMMENTS DUE BY:

PAGE	PARA	LINE	COMMENT	RESPONSE	ACC	REJ
39	Sec 5		States that there are no records "initiated, processed, or maintained as a result of this QAPjP", but Sec. 4.2, para. 2 and Sec. 4.3, para. 6 both refer to the "Batch Report" which is produced. Also, there are 2 review forms that are produced as a result of implementation of this procedure and are shown in Appendices 1 and 2. These are all records which need to be addressed in Sec. 5.0	The records mentioned in the QAPjP are initiated, processed and maintained by implementing procedures listed in the Site References section of the QAPjP, section 6.2. These implementing procedures have tables in them identifying the types of records generated and how they are protected, stored and processed, not the QAPjP.	X	
38	4.3		All other RFETS Data V&V procedures give example review forms/checklists for ITR, Tech. Supervisor and QAO reviews. This procedure does not include these forms. Sec. B3-10 of the WIPP WAP states that "Checklists must reflect review of all QC samples and Quality Assurance objective categories...". The only way of assuring that this requirement is met is by having copies of the checklists in the SOPs.	Checklists added.	X	
18	Fig 1-4		There is no reference to the WIPP-WAP in Fig. 1-4 or the references section. Please be aware that the WIPP-WAP requirements for sample handling, analysis and data review, verification and validation	WIPP-WAP reference added in the context of SUMMA sampling only.	X	

DOCUMENT REVIEW RECORD (continuation)

Title: Gas Generation Testing Program Quality Assurance Project Plan

Doc No: RS-020-001

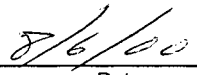
Rev: 2

Reviewer: CTAC

PAGE	PARA	LINE	COMMENT	RESPONSE	ACC	REJ
			are in effect for all samples taken for WIPP work.			

COMMENT RESOLUTION APPROVED:


Signature


Date

CARLSBAD AREA OFFICE

Sheet 1 of 1

DOCUMENT REVIEW RECORD

DOCUMENT TITLE: TRU Waste Characterization Project Quality Assurance Grading

DOCUMENT NUMBER/REVISION: PRO-486-WIPP-006/Revision 1

DOCUMENT DATE: xx/xx/00

TYPE OF REVIEW: Quality Assurance

ASSIGNED REVIEWER: Samuel A. Vega

DELEGATED REVIEWER: CTAC

ADDITIONAL INSTRUCTIONS:

FORWARD RESULTS TO:

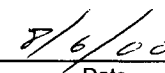
COMMENTS DUE BY:

PAGE	PARA	LINE	COMMENT	RESPONSE	ACC	REJ
4	3	1 st bullet	Addresses "mission objectives" instead of "regulatory requirements"	Changed to "regulatory requirements"	X	
8	6. [2]		There is a conflict between the wording in the "note" and paragraph 6. [2].	Deleted the "note" and reworded paragraph 6. [2].	X	
9	7		The directions under Processing Instructions still refer to flowcharts.	Changed the references to "flowcharts" to "Appendix 1."	X	

COMMENT RESOLUTION APPROVED:



 Signature



 Date

CARLSBAD AREA OFFICE

Sheet 1 of 3

DOCUMENT REVIEW RECORD

DOCUMENT TITLE: Rocky Flats Environmental Technology Site TRU Waste Characterization Program Quality Assurance Project Plan

DOCUMENT NUMBER/REVISION: 95-QAPJP-0050/ Revision 4, DCF-CHG-01 and DCF-CHG-02

DOCUMENT DATE: xx/xx/2000

TYPE OF REVIEW: Quality Assurance/Technical

ASSIGNED REVIEWER: Samuel A. Vega

DELEGATED REVIEWER: CTAC

ADDITIONAL INSTRUCTIONS:

FORWARD RESULTS TO:

COMMENTS DUE BY:

PAGE	PARA	LINE	COMMENT	RESPONSE	ACC	REJ
133	B3-10a(1)	Bullet 4	Westinghouse recently submitted a Class 1 Permit Modification on Data Review and Reporting which allowed analytical raw data to be available for review, instead of requiring it to be included in the Analytical Batch Data Report. (Note: while other raw data must be included in the BDR, only analytical raw data could be omitted from the BDR, as long as it was available for review.) In addition, the Permit Mod included tables for testing, sampling and analytical BDRs which listed the information that must either be included in the BDRs or be documented elsewhere. The jP should be reviewed against the changes in the Permit Mod.	This Class 1 Permit Modification will not be effective until November 1, 2000 and will be included in a later revision/change.	X	
135	B3-10b(1)		The Permit Mod discussed above combined the Data Summary Reports into the Batch Data Reports, and the Waste Characterization Summary Packages were renamed Waste Stream Characterization Packages. The jP should be reviewed against the changes in the Permit Mod.	See above	X	

DOCUMENT REVIEW RECORD (continuation)

Title: Rocky Flats Environmental Technology Site TRU Waste Characterization Program Quality Assurance Project Plan	Doc No: 95-QAPjP-0050	Rev: 4 DCF-CHG- 02	Reviewer: CTAC
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PAGE	PARA	LINE	COMMENT	RESPONSE	ACC	REJ
140	B3-10		A Visual Verification Batch Data Report is not explicitly identified in the WAP. Although the Visual Verification is distinguished from the VE QC check on RTR, it may be appropriate to list this BDR as a Testing BDR to be consistent with the WAP.	See above	X	
144/ 144A	B3-12h		See comment above. In addition, the recent Permit Mod provided information for Visual Verification as Acceptable Knowledge that must either be included in the Testing BDR or documented elsewhere.	See above	X	
140	B3-12e		The Permit Mod discussed above provided a list of items that must either be included in the Sampling Batch Data Report or be documented elsewhere. The jP should be reviewed against the changes in the Permit Mod.	See above	X	
3	LOEP		Page 1-2 effective date 12/09/00 should be 12/09/99	Corrected	X	
92A- 92E	B1-7		Does not list an interface document similar to the one included in the discussion of NFT on line headspace gas Sampling - see page 84, section B1-6a.	All changes associated with TRUtech have been removed because TRUtech will not be an RFETS subcontractor	X	
92A- 92E	B1-7		There is nothing in section B1-7 to indicate that TRU Tech must meet the requirements of 95-QAPjP-0050.	All changes associated with TRUtech have been removed because TRUtech will not be an RFETS subcontractor	X	
			How is Section B3-2, Headspace Gas Sampling, correlated with B1-6, Headspace Gas Sampling using the NFT on-line Integrated System?	Section B1-6 (on-line headspace sampling) is related to Section B3-2 as detailed in Table B3-3 and the text within Section B3-2. Table B3-3 presents requirements for QC samples for on-line systems; and Table B1-2 and Table B1-3, which are referenced in paragraph 2 of Section B3-2a, also present requirements for QC samples for on-line systems.	X	

DOCUMENT REVIEW RECORD (continuation)

Title: Rocky Flats Environmental Technology
Site TRU Waste Characterization Program
Quality Assurance Project Plan

Doc No:
95-QAPjP-0050

Rev: 4
DCF-CHG-
02

Reviewer: CTAC

PAGE	PARA	LINE	COMMENT	RESPONSE	ACC	REJ

COMMENT RESOLUTION APPROVED:

Mas. J. Rupp Audit Team Lead
Signature

8/6/00
Date

CARLSBAD AREA OFFICE

Sheet 1 of 3

DOCUMENT REVIEW RECORD

DOCUMENT TITLE: Transuranic (TRU) Waste Management Manual

DOCUMENT NUMBER/REVISION: 1-MAN-008-WM-001/Revision 4

DOCUMENT DATE: Xx/xx/2000

TYPE OF REVIEW: Quality Assurance/Technical

ASSIGNED REVIEWER: Samuel A. Vega

DELEGATED REVIEWER: CTAC

ADDITIONAL INSTRUCTIONS:

FORWARD RESULTS TO:

COMMENTS DUE BY:

PAGE	PARA	LINE	COMMENT	RESPONSE	ACC	REJ
89	5.3.1		In the listing of radioisotopes that must be quantified, Pu-242 is missing.	The listing of radionuclides in the TWMM, Section 5.3.1 (pg. 89); Section 5.1.4 (pg. 84); Table 5-1 (pg. 101); and Section A4.0 (pg. 258) now matches the listing presented in the WIPP-WAC, Section 3.1.4.	X	
267	second		The last sentence, does not contain the phrase "and all assays performed since the last acceptable performance check are suspect, pending satisfactory resolution."	Phrase added.	X	
370			The listing of items to include in the testing batch data does not include "Background and performance check data or control charts for the relevant time period."	Bullet added.	X	
272			The first row of the table is meaningless and should be removed.	First row of the table removed.	X	
277	last		There is no QAO for total bias. This paragraph should be modified accordingly.	Last paragraph deleted.	X	
282			The listing of items to include in the testing batch data does not include "Background and performance check data or control charts for the relevant time period."	Bullet added.	X	

CARLSBAD AREA OFFICE

Sheet 2 of 3

DOCUMENT REVIEW RECORD (continuation)

Title: Transuranic (TRU) Waste Management Manual	Doc No: 1-MAN-008-WM-001	Rev: 4	Reviewer: CTAC
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PAGE	PARA	LINE	COMMENT	RESPONSE	ACC	REJ
292-306			A number of deviations from the requirements of the WAC are called out. These primarily involve QAO determinations and calibration. These "deviations" would appear to constitute a significant problem, which needs to be addressed sooner rather than later. Perhaps the WAC needs to be changed to take better account of the differences between calorimetry and other NDA methods. However, some of the "deviations" apparently have resulted from lack of appropriate standards at RFETS, which might be attainable with sufficient effort and funding.	The resolution of the Cal-Gamma deviations issue will take time and will be tracked per PATS# 2000-000928. Note: Cal-Gamma is not included in the Sept. 2000 WIPP audit	X	
312	last		It is stated that a listing of the computer code is not provided or maintained by RFETS, for proprietary reasons. The WAC requires that the listing be part of the documentation. Conversations with Canberra personnel indicate that the listing is available for inspection at Canberra headquarters in Meriden, Conn. I do not know if this is a problem, but this should be brought to the attention of the CTAC software QA auditors. The same situation is mentioned with regard to the NMC and TRIFED software, in section A4.7.3.1.	OK (no change to the document has occurred)	X	
344			section on Instrument Performance Checks. It is stated that background and performance checks are not performed on the TRIFED system. Conversations with Canberra personnel indicated that an "internal" performance check is performed during or after each measurement. Canberra is providing me with additional information on this internal check. It would be desirable for the wording in this paragraph to be	Paragraph revised to address "internal" performance checks. Irrelevant sentences have been deleted.	X	

CARLSBAD AREA OFFICE

DOCUMENT REVIEW RECORD (continuation)

Title: Transuranic (TRU) Waste Management Manual	Doc No: 1-MAN-008-WM-001	Rev: 4	Reviewer: CTAC
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PAGE	PARA	LINE	COMMENT	RESPONSE	ACC	REJ
			changed to reflect what is done internally in this regard. This will be further evaluated during the audit. A number of sentences after this statement do not appear to have any relevance to the TRIFID system and merely confuse the issue. If they are not relevant, they should be removed.			
16	Table 2-1		The requirement for the CAO QA Manager to approve the Certification QA Plan was omitted.	This approval was inadvertently omitted and has been added.	X	
			There were no comments on the Transportation sections.		X	

COMMENT RESOLUTION APPROVED:

Mark T. Ryan Audit Team Lead
Signature

8/6/00
Date