

United States Government

memorandum

Carlsbad Field Office
Carlsbad, New Mexico 88221

DATE: February 6, 2001

REPLY TO
ATTN OF: CBFO:QA:SAV:VW:01-0617:UFC:2300

SUBJECT: RFETS Certification Authority for Transportation and Characterization of
Newly Generated Debris Waste

TO: Barbara A. Mazurowski, RFFO Area Manager

The Carlsbad Field Office (CBFO) has completed the evaluation of the Rocky Flats Environmental Technology Site's (RFETS) waste characterization and certification program for S5000 debris waste. The RFETS technical and QA programs were found to be in compliance with the Waste Analysis Plan (WAP) of the WIPP Hazardous Waste Facility Permit and the CAO *Quality Assurance Program Document (QAPD)*. The non-destructive assay (NDA) systems listed in attachment 1 were evaluated and found to be in compliance with the *Waste Acceptance Criteria for the Waste Isolation Pilot Plant*. In addition, the Gas Generation Testing Program was determined to be effectively implemented. Based on this evaluation (see attachment 1), the CBFO is satisfied that these systems and processes meet CBFO standards for waste characterization, certification, and transportation authority for debris waste.

Previous RFETS authority is expanded to include the use of the new systems and processes evaluated during audit A-00-12 (conducted September 18-22, 2000). See attachment 2 for the list of applicable procedures and documents evaluated during audit A-00-12. TRU waste characterization, certification, or transportation using significantly revised or new processes and systems must be evaluated by the CBFO prior to their implementation.

Repackaged retrievably stored and newly generated debris waste characterized to the newly generated waste characterization requirements cannot be shipped until Final Audit Report A-00-12 has been approved by the New Mexico Environment Department.



Dr. Inés R. Triay
Manager

Attachments

010213



Barbara Mazurowski

-2-

cc: w/attachments
T. Harms, DOE-HQ
K. Watson, CBFO
S. Vega, CBFO
J. Plum, CBFO
B. Bennington, CBFO
J. Legare, RFFO
L. Xuan, RFFO
G. O'Leary, RFETS
M. Gerle, WID
D. Standiford, WID
F. Marcinowski, EPA
M. Kruger, EPA
S. Zappe, NMED
A. Pangle, CTAC
C. Riggs, CTAC
T. Bowden, CTAC



RFETS CERTIFICATION PROGRAM STATUS

The site certification panel evaluated the documentation supporting the compliance and/or continued compliance of RFETS TRU waste programs. The panel unanimously recommends that the RFETS authority be granted or continued for the following processes: transportation of CH-TRU waste, newly generated and repackaged retrievably stored debris waste characterized to the newly generated waste characterization requirements, debris waste characterized to the retrievably stored waste characterization requirements, two neutron multiplicity counters, two AnTech TGS can counters, one skid-mounted TGS can/drum counter, and the RFETS Gas Generation Testing Program. See attachment 2 for a list of applicable procedures that were evaluated during audit A-00-12.

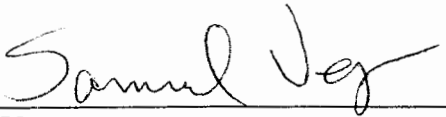
STATUS

- All program elements remain complete
- The following RFETS required site documents have been revised, approved, and are in place identifying how the site complies with the WAP, CAO QAPD, and WIPP WAC requirements:
 - QAPjP – *Rocky Flats Environmental Technology Site TRU Waste Characterization Program Quality Assurance Project Plan*, 95-QAPjP-0050, Revision 4, December 9, 1999; *Rocky Flats Environmental Technology Site Dry Residue Repackaging Process Control Plan*, RS-0-020-013, Revision 1, June 22, 2000; *Rocky Flats Environmental Technology Site Combustible Residue Repackaging Process Control Plan*, RS-020-018, Revision 1, June 30, 2000
 - GGTP QAPjP - *Rocky Flats Environmental Technology Site Gas Generation Testing Program Quality Assurance Project Plan*, RS-020-001, Revision 2, August 24, 2000
 - WCP – *Rocky Flats Environmental Technology Site Transuranic Waste Management Manual*, 1-MAN-008-WM-001, Revision 4, August 25, 2000
 - QAP – (Section 2.2.2 of WCP)
 - TRAMPAC and QA Plan – (Section 2.2.7 of WCP)
 - Packaging QA Plan – (Section 2.2.8 of WCP)
 - QAPD Procedures Matrix – *Rocky Flats Environmental Technology Site Transuranic Waste Characterization Project (TWCP) QAPD Procedures Matrix*, INS-246, Revision 7, August 21, 2000
 - Graded Approach Procedure - *Rocky Flats Environmental Technology Site TRU Waste Characterization Project Quality Assurance Grading*, PRO-486-WIPP-006, Revision 1, August 21, 2000
 - Standard operating procedures (see attachment 2 for complete procedure list)
- RFETS participation in the following performance demonstration programs (PDPs):
 - NDA PDP participation was satisfactory in cycle 7A (report date October 2000)
 - HSG PDP participation was satisfactory in cycle 14A (report date June 2000)
- CAO completed audit A-00-12 (conducted September 18-22, 2000). This audit determined that the processes, documentation, and procedures listed in attachment 2 are adequate and effectively implemented.
- No significant CARs remain open

RECOMMENDATION

The panel recommends that the CBFO Manager grant and/or continue the RFETS authority to characterize, and certify newly generated and repackaged retrievably stored debris waste characterized to the newly generated waste characterization requirements. It is also recommended that the RFETS expanded authority be limited to those systems and processes listed in attachment 2 that were evaluated during audit A-00-12.

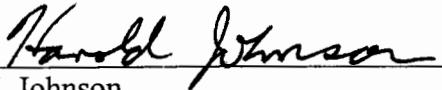
CONCURRENCE



S. Vega
Quality Assurance Manager



K. Watson
Assistant Manager
National TRU Program



H. Johnson
Acting Assistant Manager
Regulatory Compliance

RFETS PROCEDURES AUDITED FOR A-00-12		
No.	Procedure Number	Title
1	PRO-822-DR&V-371	Data Review & Verification of Wet Combustible Residue Batch Reports
2	PRO-823-REPACK-371	Combustible Residue Repackaging
3	PRO-964-CAN REPACK-371	Wet Combustible Residue Repacking, Room 3515
4	RS-020-018	Combustible Residue Repackaging Process Control Plan
5	PRO-X32-RS-0128	Dry Residue Repackaging, Building 707
6	RS-020-013, Revision 1	Dry Residue Repacking Process Control Plan
7	1-C80-WO1102-WRT	Waste/Residue Traveler Instructions
8	WIPP-010	WIPP TRU Waste Characterization Project Level Data Review and Reporting
9	PLN-97-007	TRU Waste Characterization Program Training Implementation Plan
10	95-QAPjP-0050	TRU Waste Characterization Program Quality Assurance Project Plan (TWCP QAPjP)
11	1-MAN-008-WM-001	Transuranic (TRU) Waste Management Manual (TWMM)
12	INS-246	Transuranic Waste Characterization Project (TWCP) QAPD Procedure Matrix
13	PRO-486-WIPP-006	TRU Waste Characterization Project Quality Assurance Grading
14	1-T13-TRAFFIC-306	Labeling and Marking TRUPACT Packages
15	4-T04-TRAFFIC-204	Waste Shipment Preparation Certification Form, RF-46416
16	4-T20-TRAFFIC-505	Certifying Authorized Payloads for TRUPACT-II
17	4-T43-TRAFFIC-528	TRUPACT-II Operations Flow
18	1-PRO-X05-WC-4018	Transuranic (TRU) Waste Certification
19	PRO-291-TPO/WO/5035	TRUPACT-II Verification Leak Test, Building 664
20	PRO-489-TRU-664	TRUPACT-II Operating Instructions for Building 664
21	PRO-830-DRUM-371	Drum Loading into Standard Waste Boxes
22	PRO-1018-SWB-371	Standard Waste Boxes Drum Selection and Grouping
23	PRO-845-NDA-008	Data Review, Verification, and Validation for Nondestructive Assay (NDA) Measurement Systems
24	PRO-687-TGS-371	Operating the Tomographic Gamma Scanner (TGS)
25	00-NDA-TGS-002	Qualification Plan for the Can Counter Tomographic Gamma Scanner (TGS)
26	371-TGS-02	Qualification Report for the Can Counter TGS – Unit 1
27	371-TGS-03	Qualification Report for the Can Counter TGS – Unit 2
28	PRO-864-TGS-371	Setup and Calibration for the Can Counter Tomographic Gamma Scanner (TGS)
29	00-NDA-TGS-001	Qualification Plan for the Skid Mounted Tomographic Gamma Scanner (TGS)
30	371-STGS-01 (IDC 411R)	Building 371 Skid TGS Can Counter (ID 371-STGS-01) Calibration and Qualification Report
31	Unnumbered	Calibration and Qualification Report for Drums <i>(Note: for TGS units)</i>
32	LA-UR-00-2955	Determination of the Total Measurement Uncertainty for the RFETS Skid Mounted TGS and Can TGS
33	PRO-701-TGS-371	Setup and Calibration for the Skid Mounted Tomographic Gamma Scanner (TGS)
34	PRO-697-MLC-00013	Preparation and Certification of Nondestructive Assay Standards and Sources
35	PRO-845-NDA-008	Data Review, Verification, and Validation for Nondestructive Assay (NDA) Measurement Systems
36	PRO-1072-NDA-MSQ	Matrix Specific Qualification for NDA Can Counters
37	00-NDA-NMC-100	Qualification Plan for the Neutron Multiplicity Counters (NMC) and TRIFIED Gamma-Ray Isotopics Systems
38	707-NMC01 (IDC 370)	Qualification Report for NMC – Unit 1
39	707-NMC02 (IDC 370)	Qualification Report for NMC – Unit 2
40	PRO-728-NDA-001	Operating the Neutron Multiplicity Counters and TRIFID Gamma-Ray Isotopic Systems
41	PRO-933-NMC-002	Neutron Multiplicity Counters (NMC) and TRIFID Systems Setup and Calibration
42	LATA-MGSSID-001	LATA Program Interface Document for the Mobile Gas Generation Sampling System

RFETS PROCEDURES AUDITED FOR A-00-12		
No.	Procedure Number	Title
		for use at the Rocky Flats Environmental Technology Site (RFETS)
43	MGSSSTP-LATA-001	Mobile Gas Generation Testing Sampling System (MGSS) Test Plan
44	MGSSQP-LATA	MGSS Qualification Plan
45	MGSSR-LATA-001	MGSS Qualification Report
46	PRO-440-RS-0149	GGTP Drum Selection and Batching
47	PRO-692-MGSS-030-002	Non-Heated Gas Test Canister Operations
48	PRO-856-RS-0153	Gas Generation Testing Data Reduction and Reporting
49	PRO-962-MGSS-001	Mobile Gas Generation Testing Sampling System (MGSS) Sampling Operations
50	PRO-963-MGSS-002	MGSS Data Calculation
51	RS-020-001	Gas Generation Testing Program Quality Assurance Project Plan (GGTP QAPjP)
52	1-A65-ADM-15.01	Control of Nonconforming Items
53	PRO-U76-WC-4030	Control of Waste Nonconformances
54	1-V41-RM-001	Records Management Guidance for Records Sources
55	MAN-001-SDRM	Site Document Requirements Manual
56	PRO-815-DM-01	Developing, Maintaining and Controlling Documents
57	1-PRO-077-WIPP-005	Management of Waste Information Prior to Transmittal to the Waste Records Center
58	PRO-767-WIPP-001	Waste Records Center Processing
59	L-4031-H	Software Quality Assurance Plan for the Radiological Laboratories
60	PRO-548-SSOC-SQA	Software Management for SSOC Nondestructive Assay Systems
61	1-MAN-004-CSMM	Computer Software Management Manual
62	DCI SOP NO. MLA 008	Metrology Control of Measuring and Test Equipment
63	MAN-092-M&TEM	Measuring and Test Equipment Manual

RFETS CERTIFICATION PACKAGE CHECKLIST

January, 2001

CERTIFICATION & APPROVAL LETTERS	
1. ✓	Previous certification authority letters: CAO:NTWP:RAS 00-0549 UFC 5822, 3/9/00
2. ✓	CAO:QA:SAV:00-0272 UFC 5822.00, 4/26/00
PROGRAM DOCUMENTS	
3. ✓	QAPjP: 95-QAPjP-0050, Rev. 4, 12/9/99 with change forms through DCF-CHG-04 effective 9/6/00, and approval letters CAO:QA:SAV 00-0866 UFC 2300.00, 8/28/00 and CAO:QA:SAV 00-0890 UFC 2300, 8/30/00 PCP: Dry Residue Repackaging Process Control Plan, RS-020-013, Rev. 1, 6/22/00, with change forms through DC-02 effective 8/9/00, and Combustible Residue Repackaging Process Control Plan, RS-020-018, Rev. 1, 6/30/00, with change forms through DC-02 effective 9/15/00
4. ✓	GGTP QAPjP: RS-020-001, Rev. 2, 8/24/00
5. ✓	WCP: 1 MAN-008-WM-001, Rev. 4, 8/25/00 with change form DCF-CHG-01 effective 9/6/00 and approval letter CAO:QA:SAV 00-0890 UFC 2300, 8/30/00
6. ✓	QAP (included in WCP, see Section 2.2.2)
7. ✓	TRAMPAC & QA plan (included in WCP, see Section 2.2.7)
8. ✓	Packaging QA plan (included in WCP, see Section 2.2.8)
9. ✓	QAPD Procedures Matrix, INS-246, Rev. 7, 8/21/00
10. ✓	Graded Approach Procedure, PRO-486-WIPP-006, Rev. 1, 8/21/00
LETTERS	
11. ✓	WWIS Operational Letter, 12/17/97
12. ✓	Return Shipments Letter, 9/11/97
13. ✓	Designation of Site Officials Letter, 10/12/00
SUPPORTING DOCUMENTS	
14. ✓	EPA Inspection report, October, 2000
15. ✓	EPA approval letter, 11/7/00
16. ✓	NMED approval of Final Audit Report, Audit A-00-08, 3/9/00
17. ✓	<u>Applicable PDP participation letters of approval</u> NDA: PDP Cycle 6B, approval letter CAO:NTP:MRB 00-0511 UFC 5822, 1/24/00 and approval letter CAO:NTWP:MRB:00-0526 UFC 5822.00, 2/10/00 PDP Cycle 6C, approval letter CAO: NTP:MB 00-1158 UFC 5822.00, 8/30/00 PDP Cycle 7A, approval letter CBFO:NTP:MB: GS: 00-1408 UFC 5822.00, 11/15/00
18. ✓	HSG: PDP Cycle 14A, approval letter CAO:NTWP:MRB 00-0582 UFC 5822, 4/14/00
19. ✓	WSPF RF001.01 approval letter CAO:NTWP:RAS 00-1122 UFC 5822, 6/30/00
AUDIT DOCUMENTATION	
20. ✓	Audit A-00-08 Audit Report and Final Audit Report, December 13-17, 1999 and January 18-20, 2000
21. ✓	Audit A-00-10 Audit Report and CAO approval letter CAO:QA:SAV:00-0270 UFC 2300, 3/30/00
22. ✓	Audit A-00-12 Audit Report and Final Audit Report, September 18-22, 2000 and November 1-2, 2000

Certification of TRU Waste Sites Checklist

Site: RFETS Certification Date: _____

Insert the date the item was completed in the blank.

Site-generated Documents

<u>8/30/00</u>	Approved waste certification plan (WCP)
<u>8/30/00</u>	Approved certification QA plan
<u>8/30/00</u>	Approved quality assurance project plan (QAPjP)
<u>8/21/00</u>	Approved graded approach procedure
<u>8/30/00</u>	Approved site-specific TRAMPAC and associated QA plan
<u>8/30/00</u>	Packaging QA program plan (SPM approval)

Site-generated Letters and Forms (Required)

<u>5/5/00</u>	Designation letter for SPM, WCO, and TCO (and alternates)
<u>6/30/00</u>	Waste Stream Profile Form (WSPF)
<u>9/11/97</u>	Letter of willingness to accept return shipments

Approvals and CAR Closure Letters

<u>12/17/97</u>	WIPP Waste Information System (WWIS) operational letter from WID to the site
<u>Oct 2000, 11/7/00</u>	EPA inspection report and approval of systems and processes
<u>3/9/00</u>	NMED approval of the site-specific Final Audit Report
<u>4/24/00, 2/10/00, 8/30/00, 11/15/00</u>	Successful NDA PDP participation
<u>4/14/00</u>	Successful HSG PDP participation

CAO Waste Certification Manager Responsibilities

_____	The CBFO waste certification manager chairs a certification panel composed of the CBFO transportation manager, the CBFO QA team leader/manager, and an ORC representative to determine certification authority.
_____	Recommendation from the CBFO Waste Certification Manager to the CBFO Manager that the site has met all requirements necessary for the granting of waste certification and transportation certification authority (or specify limitations of that authority, if any).

Letters of Approval to the Site

_____	Waste certification authority letter from the CBFO manager.
_____	Transportation certification authority letter from the CBFO manager.