

 ENTERED

February 7, 2001

Mr. Gregory J. Lewis  
State of New Mexico Environment Department  
Water and Waste Management Division  
P. O. Box 26110  
Santa Fe, New Mexico 87502-6110

RE: NMED APPROVAL OF RFETS FINAL AUDIT REPORT, AUDIT A-00-12

Dear Mr. Lewis

In the subject approval letter you express concerns about the independence of the Carlsbad Field Office (CBFO) audit program.

I have been the Audit Team Leader for the three Waste Isolation Pilot Plant (WIPP) Hazardous Waste Facility Permit (HWFP) audits performed at the Rocky Flats Environmental Technology Site. As you note, there was an instance during each audit when we received unsolicited input from CBFO. However, I can assure you that there was no impact on the final outcome of the audits.

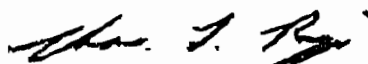
During CBFO Audit A-00-08 there was a discussion about the qualifications of a Technical Supervisor. CAO CAR 00-009 (Corrective Action Report) was issued to RFETS to address the problem.

During CBFO Audit A-00-12 there were discussions involving the necessity to prepare an accuracy report in the Acceptable Knowledge (AK) arena. The information was gathered and the report was issued by RFETS during the audit. This will be reported as Corrected During the Audit (CDA) in CBFO Audit A-01-05. Audit A-01-05 will contain the information that was collected during Audit A-00-12 and not previously reported, plus the information that was not available in September 2000.

During CBFO Audit A-01-07 there were discussions about a concern, "When headspace gas samples are composited there is a potential for 'diluting out' peaks that should be processed as TICs." RFETS was in full compliance with the HWFP, as currently written, in this area. The concern will be addressed as an Observation, directed to CBFO, in the audit report.

The protocols proposed at the meeting held February 5, 2001, should be beneficial in reducing any activities that could be possibly construed to have an adverse impact on the audit team. As I stated earlier, I do not believe that in any of these instances that the final outcome of the audit would have been any different.

Respectfully,



Charles L. Riggs  
Audit Team Leader  
CBFO Technical Assistance Contractor

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