

United States Government

Department of Energy

memorandum

Carlsbad Field Office
Carlsbad, New Mexico 88221

DATE: May 18, 2001

REPLY TO
ATTN OF: CBFO:NTP:KWW:VW:01-1022:UFC:5822SUBJECT: INEEL Certification Authority for Transportation and Characterization of
Homogeneous Solid (S3000) Waste

to: Ms. Beverly Cook, Manager, Idaho Operations Office

The Carlsbad Field Office (CBFO) has completed the evaluation of the Idaho National Engineering and Environmental Laboratory (INEEL) waste characterization and certification program for homogeneous solid (S3000) waste. The INEEL technical and QA programs were found to be in compliance with the WIPP *Hazardous Waste Facility Permit*, the *Waste Acceptance Criteria for the Waste Isolation Pilot Plant (WIPP WAC)*, the *Quality Assurance Program Document (QAPD)*, and other CBFO requirements and standards. 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 homogeneous solid waste.

Previous INEEL authority is expanded to include the use of the new systems and processes evaluated during audit A-01-02 (conducted December 5-7, 2000 and January 18, 2001) and surveillance S-01-06 (conducted May 1, 2001). See attachment 2 for the list of applicable procedures and documents evaluated during audit A-01-02 and surveillance S-01-06. TRU waste characterization, certification, or transportation using significantly revised or new processes and systems must be evaluated by the CBFO prior to their implementation.

Dr. Inés R. Triay
Manager

Attachments

010529

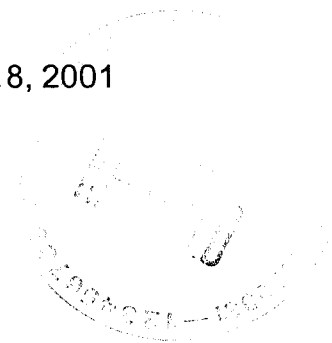


Ms. Beverly Cook

-2-

May 18, 2001

cc: w/attachments
T. Harms, DOE-HQ
K. Watson, CBFO
S. Vega, CBFO
C. Zvonar, CBFO
B. Bennington, CBFO
J. Wells, DOE/ID
L. Fritz, DOE/ID
T. Monk, BBWI
D. Murphy, BBWI
M. Gerle, WTS
L. Greene, WTS
D. Standiford, WTS
F. Marcinowski, EPA
S. Monroe, EPA
S. Zappe, NMED
M. Horseman, CTAC
T. Bowden, CTAC



INEEL CERTIFICATION PROGRAM STATUS

The site certification panel evaluated the documentation supporting the compliance and/or continued compliance of INEEL TRU waste programs. The panel unanimously recommends that the INEEL authority be expanded to include characterization and certification for homogeneous solid (S3000) waste. See attachment 2 for a list of applicable procedures that were evaluated during audit A-01-02 and surveillance S-01-06.

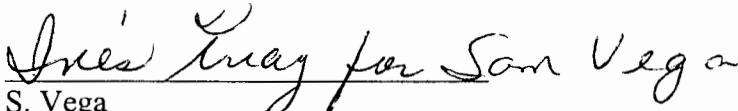
STATUS

- All program elements remain complete
- The following INEEL required site documents have been revised, approved, and are in place identifying how the site complies with the WAP, QAPD, and WIPP WAC requirements:
 - QAPjP – *INEEL Quality Assurance Project Plan for the Transuranic Waste Characterization Program*, pln-190, Revision 7, November 16, 2000
 - GGTP QAPjP – *INEEL Quality Assurance Project Plan for Gas Generation Testing Program*, PLN-508, Revision 1, August 24, 2000
 - WCP – *INEEL Program Plan for Certification of INEEL Contact-Handled Stored Transuranic Waste*, PLN-579, Revision 1, May 18, 2000
 - QAP – *INEEL TRU Waste Characterization, Certification, and Transportation Quality Program Plan*, PLN-182, Revision 6, November 8, 2000
 - TRAMPAC and QA Plan – *INEEL TRUPACT-II Authorized Methods for Payload Control (TRAMPAC) Compliance Plan*, PLN-577, Revision 0, March 14, 2000
 - Packaging QA Plan – (Section 5.3.1 of WCP)
 - Graded Approach Procedure – *INEEL TWCP Graded Approach and Quality Level Assignment*, MCP-9247, Revision 0, November 30, 2000
 - Standard operating procedures (see attachment 2 for complete procedure list)
- INEEL participation in the following performance demonstration programs (PDPs):
 - RCRA PDP participation was satisfactory in cycle 7A (report date January 2001)
 - NDA PDP participation was satisfactory in cycle 7A (report date October 2000)
 - HSG PDP participation was satisfactory in cycle 14A (report date June 2000)
- CBFO completed audit A-01-02 (conducted December 5-7, 2000 and January 18, 2001) and surveillance S-01-06 (conducted May 1, 2001). This audit and surveillance determined that the processes, documentation, and procedures listed in attachment 2 are adequate and effectively implemented.
- No significant CARs remain open.

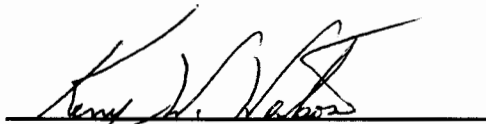
RECOMMENDATION

The panel recommends that the CBFO Manager grant and/or continue the INEEL authority to characterize, certify, and transport homogeneous solid (S3000) waste. It is also recommended that the INEEL authority be expanded to include those systems and processes listed in attachment 2 that were evaluated during audit A-01-02 and surveillance S-01-06.

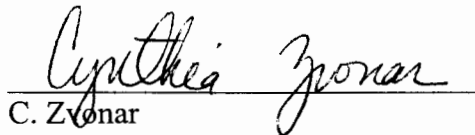
CONCURRENCE



S. Vega
Quality Assurance Manager



K. Watson
Assistant Manager
National TRU Program



C. Zonar
Assistant Manager
Regulatory Compliance

INEEL PROCEDURES		
NUMBER	PROCEDURE NUMBER	TITLE
1.	ACMM-2900	Determination of Trace Elements by ICP Atomic Emissions Spectrometry
2.	ACMM-7802	Determination of Mercury by Cold Vapor Fluorescence Spectrophotometry
3.	ACMM-8909	Microwave Assisted Digestion of Homogeneous Solids
4.	ACMM-9260	VOCs by Gas Chromatography/Mass Spectrometry
5.	ACMM-9270	SVOCs by Gas Chromatography/Mass Spectrometry
6.	ACMM-9441	Determination of Nonhalogenated Volatile Organics by Gas Chromatography
7.	ACMM-9500	Sample Preparation for SVOCs and PCBs
8.	ACMM-9925	Analysis of Gas Samples For Hydrogen/Methane By Micro GC/TDC
9.	EDF-363	SWEPP Certified Waste Sampling Plan
10.	EDF-909	TRU Waste Sampling Plan for INEEL
11.	HFEF-OI-6810	TRIPS Container Management
12.	HFEF-OI-6862	TWCP Sample Storage and Shipment
13.	HFEF-OI-6890	TWCP Visual Examination
14.	HFEF-OI-6910	TWCP Core Drilling Operations
15.	HFEF-OI-6921	TWCP Solid Sample Preparation
16.	MCP-2002	Analytical Chain of Custody
17.	MCP-2008	Analytical Data Recording, Review and Reporting
18.	MCP-2009	Analytical Software Control
19.	MCP-2011	Analytical Logbooks
20.	MCP-2520	TWCP QA Records Management
21.	MCP-2527	DQO Reconciliation at SPO Level
22.	MCP-2529	Drum Data Review by the SQAQ
23.	MCP-2530	SQAQ Drum Data Review Checklists
24.	MCP-2536	Project Level Data Verification by the SPM
25.	MCP-2542	Preparation of Waste Profile Forms
26.	MCP-2546	Visual Examination Process
27.	MCP-2988	Confirmation, Resolution, and Reevaluation of AK Information
28.	MCP-2989	Collection, Review, and Management of Acceptable Knowledge Documentation
29.	MCP-2990	Radioassay Total Uncertainty Process Using Modified Statistical Sample Approach
30.	MCP-2991	Radioassay Total Uncertainty Process Using Statistical Sampling Approach
31.	MCP-2995	Project Level Electronic Data V and V By the SDVO
32.	MCP-2996	Electronic Data Review By the SDVO
33.	MCP-2997	SQAQ Electronic Data Review Checklists
34.	NT-AP-01	Documents and Records Management
35.	NT-AP-03	ANL-W TWCP Data Generation Level Review
36.	NT-AP-04	QA Requirements Implementation
37.	NT-AP-05	TWP Training Plan
38.	NT-AP-08	TWCP Data Input and QA Release for TRIPS
39.	PLN-182	INEEL TRU Waste Characterization, Certification, and Transportation Quality Program (QPP)
40.	PLN-190	Quality Assurance Project Plan (QAPjP)
41.	PLN-579	Program Plan for Certification of INEEL Contact-Handled Stored Transuranic Waste (Certification Plan)
42.	PLN-587	Training Implementation Plan for TWCP
43.	PLN-600	Analytical Laboratory Department QA Plan for the TWCP
44.	QTP-004	Qualification Test Procedure (PAN)
45.	QTP-011	Qualification Test Procedure (SGRS)
46.	QTP-027	Mobile Real-Time Radiography, Trailer 1
47.	TPR-1573	PAN Drum Assay System

INEEL PROCEDURES		
NUMBER	PROCEDURE NUMBER	TITLE
48.	TPR-1588	Gamma Ray Spectrometer System
49.	TPR-1665	TRUPACT II Payload Assembly Operation in WMF-635
50.	TPR-1666	TRUPACT II Loading Operations in WMF-635
51.	TPR-1719	Calibration of Gamma Assay System