

United States Government

memorandum

Carlsbad Field Office
Carlsbad, New Mexico 88221

DATE: JUN 05 2001

REPLY TO
ATTN OF: CBFO:NTP:JDV:VW:01-1030:UFC:5822

SUBJECT: RFETS Certification Authority for Transportation and Characterization of Homogeneous Solid (S3000) Waste

TO: Barbara A. Mazurowski, Manager, Rocky Flats Field Office

The Carlsbad Field Office (CBFO) has completed the evaluation of the Rocky Flats Environmental Technology Site's (RFETS) waste characterization and certification program for retrievably stored/repackaged homogeneous solid (S3000) waste. This evaluation included only those wastes where the "cone and quarter" method or the "grid" method of sampling is utilized. Implementation of any other sampling method will require prior audit and approval by CBFO. 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*, 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 and certification authority for the aforementioned subset of the homogeneous solid waste.

Previous RFETS authority is expanded to include the use of the new systems and processes evaluated during audit A-01-05 (conducted September 18-22, 2000 and March 26-28, 2001). See attachment 2 for the list of applicable procedures and documents evaluated during audit A-01-05. 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



Barbara A. Mazurowski

-2-

June 5, 2001

cc: w/attachments
K. Watson, CBFO
R. Knerr, CBFO
S. Vega, CBFO
L. Chism, CBFO
C. Zvonar, CBFO
B. Bennington, CBFO
T. Harms, DOE-HQ
J. Legare, RFFO
L. Xuan, RFFO
G. O'Leary, RFETS
F. Marcinowski, EPA
S. Monroe, EPA
S. Zappe, NMED
M. Gerle, WTS Operating Record
L. Greene, WTS
D. Standiford, WTS
M. Horseman, 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 expanded to include characterization and certification for retrievably stored/repackaged homogeneous solid (S3000) waste where the "cone and quarter" method or the "grid" method of sampling is utilized. See attachment 2 for a list of applicable procedures that were evaluated during audit A-01-05.

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 Waste Analysis Plan of the HWFP, QAPD, SARP, and WIPP WAC requirements:
 - QAPjP – *Rocky Flats Environmental Technology Site TRU Waste Characterization Program Quality Assurance Project Plan*, 95-QAPjP-0050, Revision 4
 - PCPs – *Rocky Flats Environmental Technology Site Salt Residue Repack, Buildings 371 and 707 Process Control Plan*, RS-020-021, Rev. 1; *Rocky Flats Environmental Technology Site Ash Residue Repack Project Process Control Plan*, RS-020-012, Rev. 1
 - GGTP QAPjP - *Rocky Flats Environmental Technology Site Gas Generation Testing Program Quality Assurance Project Plan*, RS-020-001, Revision 2
 - WCP – *Rocky Flats Environmental Technology Site Transuranic Waste Management Manual*, 1-MAN-008-WM-001, Revision 4
 - 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)
 - Graded Approach Procedure - *Rocky Flats Environmental Technology Site TRU Waste Characterization Project Quality Assurance Grading*, PRO-486-WIPP-006, Revision 1
 - Standard operating procedures (see attachment 2 for complete procedure list)
- RFETS 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-01-05 (conducted September 18-22, 2000 and March 26-28, 2001). This audit determined that the processes, documentation, and procedures listed in attachment 2 are adequate and effectively implemented.
- NMED has approved the RFETS Final Audit Report for Audit A-01-05 (approval letter dated June 5, 2001).
- EPA has approved RFETS for the systems and processes for characterizing CH residues (November 7, 2000) and for the systems and processes for characterizing CH dry, wet, salt, and ash residues (January 13, 2000).
- No significant CARs remain open.

RECOMMENDATION

The panel recommends that the CBFO Manager grant and/or continue the RFETS authority to characterize, certify, and transport retrievably stored/repackaged homogeneous solid (S3000) waste where the "cone and quarter" method or the "grid" method of sampling is utilized. It is also recommended that the RFETS authority be expanded to include those systems and processes listed in attachment 2 that were evaluated during audit A-01-05.

CONCURRENCE

Samuel A. Vega 6/5/01
S. Vega Date
Quality Assurance Manager

FOR Jed O. Vandeker 6/5/01
K. Watson Date
Assistant Manager
National TRU Program

Ines Tray for Cindy Zvonar 6/5/01
C. Zvonar Date
Assistant Manager
Regulatory Compliance

RFETS PROCEDURES		
No.	Procedure Number	Title
1	PRO-484-WIPP-003	Collection, Review, and Confirmation of Acceptable Knowledge Documentation
2	PRO-404-RS-0145	Data Review and Verification, Ash Residue Repack Batch Reports
3	PRO-428-RS-0146	Data Review and Validation of Ash Residue Repack Sampling Batch Reports
4	PRO-940-WIPP-010	WIPP TRU Waste Characterization Project Level Data Review and Reporting
5	PRO-944-WIPP-008	Completion of Waste Stream Profile Form for Waste to be Disposed of at WIPP
6	PRO-X56-RS-0123	Ash Residue Repack, Building 707
7	RS-012-005	Ash Residue Repack Solid Sampling and Analysis Plan
8	RS-020-012	Ash Residue Repack Project, Building 707 Process Control Plan
9	PRO-110-WP-1212	WIPP Waste Information System (WWIS) Data Entry
10	4-K47-WEM-WP1210	WEMS Offsite Shipping Module
11	L-4028	Sample Administration for the Radiological Laboratories
12	L-4035	Data Review and Validation for Total Metals for WIPP-TRU Waste Characterization Program (TWCP) Data Generation Level
13	L-4108	Toxicity Characteristic Leaching Procedure (TCLP) for Metals in Waste
14	L-4150	Total Metals Acid Digestion Procedure of Solid, Liquid and TCLP Extract Samples
15	L-4151	Waste Analysis by Atomic Absorption Spectroscopy
16	L-4152	Mercury Analysis in Water (Cold-Vapor Technique)
17	L-4153	Trace Metals by ICP Spectrometry (Solids, Liquids, and TCLP Extracts)
18	L-4039	WIPP Data Review and Validation for Semi-Volatile Organic Compounds (in Solid Samples)
19	L-4214	Extraction of Total SVOCs for GC/MS Analysis for WIPP
20	L-4215	GC/MS Determination of Total SVOCs for WIPP
21	L-4038	WIPP Data Review and Validation for Volatile Organic Compounds in Solid Samples
22	L-4165	GC/MS Determination of Volatile Organic Compounds (Solids, Liquids, and TCLP Extracts)
23	PRO-604-RC-001	Field Sample QC Data Calculation, Review and Validation Batch Reports
24	PRO-984-440-HSGS	Waste Management Operations Building 440 C-Cell Operations
25	PRO-543-ASD-002	Initiation and Preparation of Chain of Custody Forms
26	PRO-908-ASD-004	On-Site Transfer and off-Site Shipment of Samples
27	L-1000	Requirements for Radiological Laboratories L-Procedures
28	L-4026	Records Handling, Storage, and Retrieval for the WIPP Project File

RFETS PROCEDURES		
No.	Procedure Number	Title
29	ASD-003	Identification System for Reports and Samples
30	4-W84-RS-0114	Salt Residue Stabilization/Repack, Building 707
31	PRO-264-RS-0141	Data Review and Validation of Salt Residue Batch Reports
32	PRO-544-SALT REPACK-371	Salt Residue Repack, Building 371
33	PRO-603-RS-0152	Data Review and Verification of Salt Residue Repack Sampling Batch Reports
34	PRO-860-RS-0156	Building 371 and 707 Salt Residue Sampling
35	RS-012-004	Salt Residue Sampling and Analysis Plan
36	RS-020-021	Salt Residue Repack, Building 371 and Building 707 Process Control Plan
37	1-C80-WO1102-WRT	Waste/Residue Traveler Instructions
38	95-QAPjP-0050	TRU Waste Characterization Program Quality Assurance Project Plan (TWCP QAPjP)
39	PLN-97-007	TRU Waste Characterization Program Training Implementation Plan
40	1-MAN-008-WM-001	Transuranic (TRU) Waste Management Manual (TWMM)
41	1-A65-ADM-15.01	Control of Nonconforming Items
42	PRO-U76-WC-4030	Control of Waste Nonconformances
43	1-PRO-077-WIPP-005	Management of Waste Information Prior to Transmittal to the Waste Records Center
44	PRO-767-WIPP-001	Waste Records Center Processing