



United States Government

Department of Energy

# memorandum

Carlsbad Field Office  
Carlsbad, New Mexico 88221

DATE: September 10, 2001

REPLY TO  
ATTN OF: CBFO:NTP:KWW:VW:01-1081:UFC:2300

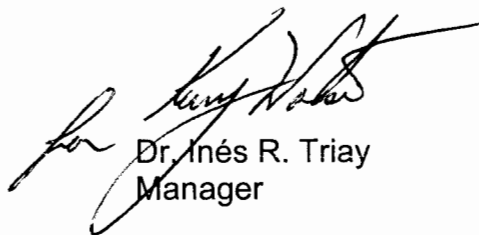
SUBJECT: Hanford Annual Re-evaluation for TRU Waste Program Compliance

TO: Keith Klein, Manager, Richland Operations Office

The Carlsbad Field Office (CBFO) has completed its annual re-evaluation of the Hanford Site TRU waste characterization and certification program for CH debris waste. The Hanford Site technical and QA programs were found to be in continued compliance with the Waste Analysis Plan (WAP) of the *Hazardous Waste Facility Permit (HWFP)*, the *Waste Acceptance Criteria for the Waste Isolation Pilot Plant (WIPP WAC)*, the *Quality Assurance Program Document (QAPD)*, the *Safety Analysis Report for the TRUPACT-II Shipping Package (SARP)*, and other CBFO requirements and standards. Based on this evaluation (see attachment 1), the CBFO is satisfied that these systems and processes meet the requirements for characterization, certification, and transportation of CH debris waste.

The Hanford Site certification authority is continued for those systems and processes approved by CBFO on May 31, 2000. TRU waste characterization, certification, or transportation using significantly revised or new processes and systems must be evaluated by CBFO prior to their implementation.

If you have any questions, please call Mr. Kerry Watson at (505) 234-7357.



Dr. Inés R. Triay  
Manager

Attachments



## HANFORD CERTIFICATION PROGRAM STATUS

The site certification panel evaluated the documentation supporting the compliance and/or continued compliance of the Hanford Site TRU waste characterization and certification programs. The panel unanimously recommends that the Hanford Site authority for CH debris wastes be granted or continued for the following processes: acceptable knowledge; radiography; visual examination; headspace gas; and non-destructive assay (two Gamma Energy Assay Systems). See attachment 2 for a complete list of procedures that were evaluated during the audits listed below.

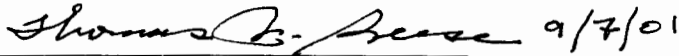
### STATUS

- All program elements remain complete
- The following Hanford 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 – *Hanford Site Transuranic Waste Characterization Quality Assurance Project Plan*, HNF-2599, Rev. 4
  - WCP – *Hanford Site Transuranic Waste Certification Plan*, HNF-2600, Rev. 5
  - QAP – (included in WCP, Section 5.0)
  - TRAMPAC – (included in WCP, Section 4.0)
  - TRAMPAC QA Plan – (included in WCP, Section 4.0)
  - Packaging QA Plan – (included in WCP, Section 5.0)
  - Graded Approach Procedure – *TRU Graded Approach*, WMH-400, Section 1.1.2, Rev. 6
  - Standard operating procedures (see attachment 2 for complete procedure list)
- Hanford 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 15A (report date June 2001).
- CBFO completed audits A-00-05 (January 24-28, 2000) and A-01-03 (June 11-15, 2001). These audits determined that the processes, documentation and procedures listed in attachment 2 are or remain adequate and effectively implemented.
- NMED has approved the Hanford Final Audit Report for Audit A-00-05 (approval letter dated May 31, 2000).
- EPA has approved Hanford for QA (April 3, 2001) and the systems and processes for characterizing CH debris waste (June 6, 2000).
- No significant CARs remain open.


**RECOMMENDATION**

The panel recommends that the CBFO Manager continue the Hanford Site authority to characterize, certify and transport CH-TRU debris waste. It is also recommended that this authority be limited to those systems and processes listed in attachment 2 that were evaluated during audits A-00-05 and A-01-03.

**CONCURRENCE**

 9/7/01

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J. Reese  
Quality Assurance Manager

  
\_\_\_\_\_  
K. Watson  
National TRU Program Team Leader

  
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C. Zvonar  
Assistant Manager  
Regulatory Compliance

**HANFORD PROCEDURES AUDITED**

<b>NUMBER</b>	<b>PROCEDURE NUMBER</b>	<b>TITLE</b>
1.	WMH-400, section 1.1.2	TRU Graded Approach
2.	WMH-400, section 1.2.1	TRU Training and Qualification Plan
3.	WMH-400, section 1.2.2	Qualification and Certification of Inspection and Test Personnel
4.	WMH-400, section 1.2.3	Qualification and Certification of Audit Personnel
5.	WMH-400, section 1.3.1	TRU Corrective Action Management
6.	WMH-400, section 1.3.2	TRU Nonconforming Item Reporting and Control System
7.	WMH-400, section 1.3.3	TRU Corrective Action Reporting and Control
8.	WMH-400, section 1.4.1	TRU Document Control
9.	WMH-400, section 1.5.1	TRU Records Management
10.	WMH-400, section 2.1.1	TRU Process Control
11.	WMH-400, section 2.1.2	TRU Operating Procedure Preparation and Approval
12.	WMH-400, section 2.1.3	TRU Administrative Procedure Preparation and Approval
13.	WMH-400, section 2.1.5	TRU Transportation Logistics
14.	WMH-400, section 2.1.6	TRU Analytical Procedure Process
15.	WMH-400, section 2.3.1	TRU Procurement Planning
16.	WMH-400, section 2.3.2	TRU Procurement Document Control
17.	WMH-400, section 2.3.3	TRU Control of Purchased Items and Services
18.	WMH-400, section 2.4.4	TRU Control of Measuring, Test, and Data Collecting Equipment
19.	WMH-400, section 2.4.5	TRU Identification and Control of Items
20.	WMH-400, section 3.1.1	TRU Management Assessment
21.	WMH-400, section 3.1.2	Quality Assurance Reports to Management
22.	WMH-400, section 3.2.1	TRU Independent Assessments
23.	WMH-400, section 3.2.2	TRU Surveillance Program
24.	WMH-400, section 6.1.1	TRU Software Quality Assurance
25.	WMH-400, section 7.1.1	TRU Waste DQOs Reconciliation and Reporting
26.	WMH-400, section 7.1.3	Transuranic Waste Repackaging, Visual Examination, and Sampling
27.	WMH-400, section 7.1.4	Sampling Design and Data Analysis for RCRA Characterization and Visual Examination of Retrievably Stored Waste
28.	WMH-400, section 7.1.5	WWIS Data Reporting and Entry
29.	WMH-400, section 7.1.6	TRU Waste Project Level Data Validation and Verification
30.	WMH-400, section 7.1.7	TRU Waste Sample and Waste Container Management Activities
31.	WMH-400, section 7.1.8	Transuranic Waste Transportation and Disposal Certification
32.	WMH-400, section 7.1.9	Acceptable Knowledge Documentation Management
33.	WMH-400, section 8.1.1	Logkeeping Practices for WIPP Activities in Special Analytical Support
34.	WMH-400, section 8.1.8	Data Management for Headspace Gas Results
35.	WMH-350, section 2.2	Calculation of Assay Results
36.	WMH-350, section 2.3	Data Management of NDE/NDA Results
37.	WMH-350, section 2.4	QAOS for NDA Results
38.	WMH-350, section 2.5	GEA Energy and Efficiency Setup and Baseline Establishment
39.	WRP1-OP-0503	Move Drums Throughout WRAP
40.	WRP1-OP-0521	Receive and Load TRUPACT Containers
41.	WRP1-OP-0522	Assemble and Stretch Wrap TRUPACT Payload
42.	WRP1-OP-0524	Helium Leak Detector Operation
43.	WRP1-OP-1225	Radiological Support of TRUPACT-II Shipping and Receiving
44.	WRP1-OP-0726	Glovebox Loadout
45.	WRP1-OP-0729	Visual Examination
46.	WRP1-OP-0906	Gamma Energy Assay Operations
47.	WRP1-OP-0908	Operation of Drum NDE System
48.	WRP1-OP-0911	Storage and Use of Special Nuclear Material (for PDP work only)
49.	DO-080-009	Obtain Headspace Gas Samples of TRU Waste Containers
50.	LA-523-410	Determination of VOCs in TRU/Mixed Waste Container Headspace
51.	LA-523-426	Determination of Permanent Gases in Waste Container Headspace
52.	LO-080-407	Cleaning SUMMA Canisters

**HANFORD PROCEDURES AUDITED**

53.	LO-090-450	TRU Project Sample Chain-of-Custody, Acceptance, and Disposal
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Keith Klein

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September 10, 2001

cc: w/attachments  
T. Harms, DOE-HQ  
K. Watson, CBFO  
C. Zvonar, CBFO  
R. Knerr, CBFO  
J. Reese, CBFO  
L. Chism, CBFO  
B. Bennington, CBFO  
T. Shrader, DOE-RL  
P. Crane, Hanford  
F. Marcinowski, EPA  
S. Monroe, EPA  
S. Zappe, NIMED  
M. Gerle, WTS Operating Record  
L. Greene, WTS  
D. Standiford, WTS  
M. Horseman, CTAC  
T. Bowden, CTAC

