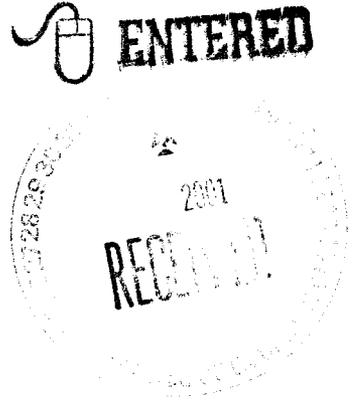




Department of Energy
Carlsbad Field Office
P. O. Box 3090
Carlsbad, New Mexico 88221
November 29, 2001



Mr. Steve Zappe
WIPP Project Leader
Permits Management Program
2905 Rodeo Park Drive East, Bldg. 1
Santa Fe, NM 87505

Subject: Response to Observer Inquiry Forms A-02-09-001 and A-02-09-002

Dear Mr. Zappe:

This letter provides the CBFO response to the Observer Inquiry forms you submitted to the Audit Team Leader during the certification audit of the Central Characterization Project (CCP) at the Savannah River Site (SRS) during October of this year.

Each inquiry response is provided as an enclosure to this letter. Enclosure A addresses A-02-09-001 and enclosure B addresses A-02-09-002.

If you have any further questions concerning these responses, please contact Thomas J. Reese of my staff at (505) 234-7311.

Sincerely,

Inés R. Triay
Manager

cc:w/enclosures
T. Reese, CBFO *ED
L. Chism, CBFO
K. Watson, CBFO *ED
B. Bennington, CBFO *ED
M.F. Sharif, WTS *ED
D.H. Haar, WTS *ED
D. Conrad, SRS *ED
D. Ormond, SRS *ED
E. Bradford, CTAC *ED
T. Bowden, CTAC
*ED denotes Electronic Distribution



Enclosure A
Response to Observer Inquiry Form No. A-02-09-001

Inquiry: The current linkage between CCP and SRS (i.e., the CCP SPM and the SRS STR) appears insufficient to ensure adequate communication between CCP and the existing approved waste characterization program at SRS. The problem is apparently compounded by both programs characterizing the same waste stream. For example, does the identification of an additional waste code by one program dictate the addition of that waste code to the same waste stream by the other person? Furthermore, what linkages exist for the exchange and verification/validation of data collected by the separate programs? The current organizational chart provides for no direct communication between the SRS STR and the SRS SPM.

The CBFO response to each portion of this inquiry is provided below:

1. There appears to be insufficient controls in place to ensure adequate communication between the CCP Site Project Manager (SPM) and SRS Site Technical Representative (STR) as related to issues that affect the SRS TRU waste characterization program.

The working relationship between SRS and CCP has been established such that all work performed at the SRS by the CCP will be under the direct control of the SRS STR. The Statement of Work (SOW) and the Interface Document define the relationship as CCP working for and at the direction of SRS. As such, it is the responsibility of the SRS STR to ensure work performed by the CCP does not adversely affect the SRS TRU waste characterization program. It is for this reason the SRS STR's concurrence is required on the submittals prepared by CCP, such as the waste stream profile form and the AK Summary report.

However, to further ensure the STR has adequate information to assess any impact of CCP to the SRS program, the CCP Site Project Quality Assurance Officer (SPQAO) will provide additional information. This additional information will consist of periodic trending reports, an initial site miscertification report, biannual waste material parameter weight comparison reports, and summary category group specific miscertification reports. A change to the interface document is in process to add these requirements to the section that defines the responsibilities of the CCP SPQAO. This change will be submitted to the NMED when complete as evidence of implementation.

2. SRS and CCP programs characterizing the same waste stream.

A section is being added to the interface document to clarify roles and responsibilities for the special case where both programs are working from the same container inventory. The approach has been to divide the existing waste stream into separate process lines based on which program is processing the containers. A draft of the planned addition follows:

Section 4.15 - Both programs working from the same container inventory where both the SRS TRU waste certification program and the CCP TRU waste certification program are processing drums from the same container inventory, the following steps will apply:

Section 4.15.1 - Each process line will issue its own AK Summary Report to describe the container inventory. The SRS STR, as assisted by the SPMs, will reconcile any differences between the two summaries such that the two reports are consistent.

Section 4.15.2 - As containers are retrieved from storage, they will be assigned to one of the process lines by the SRS STR via written correspondence.

Section 4.15.3 - Each process line will characterize and certify the containers assigned to it. This work includes all reconciliation activities.

Section 4.15.4 - During characterization or reconciliation activities where AK deficiencies are identified with either process line, the SRS STR will ensure the other process line's SPM is notified. The SPMs will then develop appropriate corrective actions to ensure both AK reports remain consistent.

Section 4.15.5 - Each process line will prepare a waste stream profile form for the drums it has processed.

Section 4.15.6 - On a waste stream lot basis, the CCP SPM will provide the following to the SRS STR:

- DQO Reconciliation Documentation
- Cross reference of containers to batch data reports
- Headspace Gas Summary Data Report
- TIC Listing and evaluation
- RTR and VE summary documentation
- Waste Container non-conformance summary report

Section 4.15.7 - On a waste stream lot bases, the SRS STR will request the SRS SPM to review the CCP waste stream lot documentation and compare it to the SRS waste stream characterization data. Any discrepancies identified between the process lines will be reconciled by the SPMs.

The revised interface document will be submitted to the NMED when complete as evidence of implementation of this change.

3. Will the identification of an additional hazardous waste code by one program dictate the addition of that waste code to the other program's waste stream?

Yes, as long as SRS and CCP are characterizing the same waste stream. In this case, when either SRS or CCP identifies a hazardous waste code that was not initially identified through AK, both the SRS and CCP AK documentation will be reevaluated and corrected to reflect the current knowledge of the waste stream.

4. What linkages exist for the exchange and verification/validation of data collected by the separate programs?

The following linkages exist in the Interface Document:

Sections 3.1.6 and 4.8.2 require the CCP to submit the Acceptable Knowledge Summary Report to SRS for review and concurrence.

Section 4.13.2 requires all revisions to the AK Summary Report to be provided to the SRS for review.

Section 4.3 requires both programs to notify the other of non-conformances.

Section 4.9.4 requires CCP to submit the CCP Waste Stream Profile Forms to SRS for review and concurrence.

These existing linkages, combined with the additional changes noted above, will ensure the appropriate exchange of data collected by the separate programs.

5. The current organization chart provides for no direct communication between the SRS STR and the SRS SPM.

The SRS STR and the SRS SPM both work for the WSRC Solid Waste Division. The organizational chart included as part of the interface document has been updated to reflect this arrangement.

It should be noted, however, that the organizational chart is intended to illustrate organizational structure, not lines of communication. Direct communication can and will occur between all parts of the organization. The interface document is the mechanism that identifies specific lines of direct communication.

Enclosure B
Response to Observer Inquiry Form No. A-02-09-002

Inquiry: The location of records collected under the CCP (i.e., Carlsbad) may prove problematic if the State of South Carolina wants access to the data. According to the Statement of Work, section 3.1.3.3, the CCP is required to submit "all documentation related to characterization" to SRS prior to demobilization. It is not clear if this documentation could be provided in a timely manner to the SC regulators.

CBFO response:

Records, which demonstrate compliance with the waste generator requirements specified in 40CFR262, will continue to be maintained at the SRS. It is only the records which demonstrate compliance with the disposal requirements of 40CFR264.13 as prescribed by the WAP which will be maintained by the CCP until program demobilization, at which time they will be turned over to the SRS.

CBFO believes this arrangement will ensure that records of primary interest to the State of South Carolina are readily available.

Nonetheless, CCP will provide any records maintained by the CCP to the SRS STR upon request. Documents can be airfreighted with delivery within 2 days, or faxing can be used for same day delivery. The SRS STR will then forward the information to the SRS DOE or the State of South Carolina, as appropriate.