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PETER MAGGIORE
SECRETARY

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

August 8, 2002

Dr. Inés Triay, Manager
Carlsbad Field Office
Department of Energy
P.O. Box 3090
Carlsbad, New Mexico 88221-3090

Mr. John Lee, General Manager
Westinghouse TRU Solutions LLC
P. O. Box 2078
Carlsbad, New Mexico 88221-5608

RE: NMED APPROVAL OF SRS FINAL AUDIT REPORT, AUDIT A-02-20
WASTE ISOLATION PILOT PLANT
EPA I.D. Number NM4890139088

Dear Dr. Triay and Mr. Lee:

On April 3, 2002, NMED received the initial Final Audit Report of the Savannah River Site (SRS), Audit Number A-02-20 (**Audit Report**), from the Department of Energy's Carlsbad Field Office (CBFO). CBFO and Westinghouse TRU Solutions, Inc. (**the Permittees**) were required to submit the aforementioned Audit Report under the Waste Isolation Pilot Plant (WIPP) Hazardous Waste Facility Permit as specified in Permit Condition II.C.2.c. The intended scope of this audit was to evaluate the adequacy, implementation, and effectiveness of the RFETS certification waste characterization technique of a new headspace gas (HSG) processes for retrievably stored contact-handled debris waste relative to the requirements of the WIPP Permit.

The Audit Report documentation submitted to NMED consisted of the following items:

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Dr. Inés Triay
Mr. John Lee
August 8, 2002
Page 2

- a narrative report (redline/strikeout and clean)
- completed copies of relevant Permit Attachment B6 checklist
- final RFETS standard operating procedures (electronic and hardcopy)
- corrective action reports and items corrected during the audit
- objective evidence examined during the audit
 - acceptable knowledge
 - headspace gas

NMED has examined the Audit Report for evidence of compliance with the requirements of Permit Conditions II.C.2 (Audit and Surveillance Program) and II.C.1 (Waste Analysis Plan). NMED representatives observed the CCP/SRS audit conducted March 13-14, 2002, and specifically evaluated the Audit Report for compliance with the following permit requirements:


- Permit Condition II.C.2.a (*Requirement to Audit*) - the Permittees shall demonstrate to the Secretary that the generator/storage sites have implemented and comply with applicable requirements of the WAP by conducting an audit of the generator/storage sites as specified in Permit Attachment B, Section B-4b(1)(iii), and Permit Attachment B6 (Waste Isolation Pilot Plant Permittees' Audit and Surveillance Program), and as required by 20 NMAC 4.1.500 (incorporating 40 CFR §264.13).
- Permit Condition II.C.2.c (*Final audit report*) - the Permittees shall provide the Secretary a final audit report as specified in Permit Attachment B6. The final audit report shall include all information specified in Permit Attachment B6, Section B6-4, and: (i) A detailed description of all corrective actions and the resolution of any corrective action applicable to WAP requirements, including re-audits if required; (ii) documentation necessary for the Secretary to determine if the corrective action was resolved.

The Audit Report indicated that there were no WAP related conditions. NMED concludes that the Audit Report adequately demonstrates that RFETS has implemented the applicable characterization requirements of the WAP for the recertification of retrievably stored debris and homogeneous solids contact-handled waste. Therefore, NMED approves the Permittees' Final Report for SRS Audit A-02-20.

Dr. Inés Triay
Mr. John Lee
August 8, 2002
Page 3

If you have any questions regarding this matter, please contact me at (505) 827-1758.

Sincerely,



Gregory J. Lewis
Director
Water and Waste Management Division

GJL:soz

cc: James Bearzi, NMED HWB
John Kieling, NMED HWB
Steve Zappe, NMED HWB
Carl Will, NMED HWB
David Neleigh, EPA Region 6
Mary Kruger, EPA ORIA
Connie Walker, TechLaw
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