



GARY E. JOHNSON  
GOVERNOR

*State of New Mexico*  
**ENVIRONMENT DEPARTMENT**

*Water and Waste Management Division*  
*Harold Runnels Building*

*1190 St. Francis Drive, P.O. Box 26110*

*Santa Fe, New Mexico 87502-6110*

*Telephone (505) 827-1758*

*Fax (505) 827-0310*

*www.nmenv.state.nm.us*



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 RFETS FINAL AUDIT REPORT, AUDIT A-02-19**  
**WASTE ISOLATION PILOT PLANT**  
EPA I.D. Number NM4890139088

Dear Dr. Triay and Mr. Lee:

On July 5, 2002, NMED received the initial Final Audit Report of the Rocky Flats Environmental Technology Site (**RFETS**), Audit Number A-02-19 (**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 processes of newly generated contact-handled waste a new mobile real-time radiography unit relative to the requirements of the WIPP Permit.

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

- a narrative report (redline/strikeout and clean)



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- completed copies of relevant Permit Attachment B6 checklists
- final RFETS standard operating procedures (electronic and hardcopy)
- corrective action reports and items corrected during the audit
- objective evidence examined during the audit
  - general information
  - acceptable knowledge
  - headspace gas
  - real time radiography
  - visual examination

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 June 4-6, 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 eleven (11) WAP related conditions warranting the issuance of three (3) deficiencies corrected during the audit (CDAs), four (4) observations, and four (4) recommendations. NMED concludes that the Audit Report adequately demonstrates that RFETS has implemented the applicable characterization requirements of the WAP for the

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certification of newly generated contact-handled waste and as new mobile real-time radiography unit. Therefore, NMED approves the Permittees' Final Report for RFETS Audit A-02-19.

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  
David Neleigh, EPA Region 6  
Mary Kruger, EPA ORIA  
Connie Walker, TechLaw  
Matthew Silva, EEG  
Don Hancock, SRIC  
Joni Arends, CCNS

