

memorandum

DATE: August 20, 2002

REPLY TO
ATTN OF: CBFO:NTP:KWW:VW:02-2790:UFC:5822

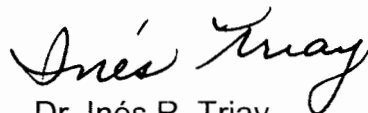
SUBJECT: Annual Re-evaluation and Expansion of Savannah River Site (SRS) Certification Authority

TO: Jeffrey M. Allison, Acting Manager, DOE - SR
Beth Bennington, CBFO

The Carlsbad Field Office (CBFO) completed the annual re-evaluation (A-02-06) of the Savannah River Site (SRS) TRU Waste Program on December 14, 2001. In addition, SRS characterization activities beyond waste stream SR-T001-221F-HET were evaluated to include all retrievably stored debris waste. An additional audit (A-02-20) was conducted in March 2002 to evaluate compositing of headspace gas samples and canister cleaning. The SRS technical and quality assurance programs for characterizing debris waste using acceptable knowledge, headspace gas sampling and analysis (including compositing), real-time radiography, and visual examination were found to be in compliance with the "Waste Analysis Plan" (WAP) of the *WIPP Hazardous Waste Facility Permit*, the *Quality Assurance Program Document* (QAPD), and other CBFO requirements and standards.

Based on the evaluations conducted during audit A-02-06 the week of December 10-14, 2001 and audit A-02-20 conducted March 13-14, 2002, the CBFO therefore continues and/or expands the SRS authority for characterizing contact-handled retrievably stored debris waste using acceptable knowledge, headspace gas sampling and analysis (including compositing), real-time radiography, and visual examination to support the Central Characterization Project (CCP). The CCP activities at SRS that were certified February 27, 2002 remain unchanged and are scheduled to be re-evaluated in the fall of 2002. See the attachments to this letter for lists of all currently certified SRS and CCP systems, documents, and procedures.

Debris waste shipments are limited to those characterized by SRS in support of the CCP activities and those characterized by the CCP. Until the Environmental Protection Agency (EPA) approves the SRS nondestructive assay system, debris waste, other than waste stream SR-T001-221F-HET, characterized by SRS using this system may not be shipped. TRU waste characterization, certification, or transportation using new or altered systems or revised or new procedures must be evaluated by the CBFO prior to implementation.



Dr. Inés R. Triay
Manager

Attachments

020835



Jeffrey M. Allison
Beth Bennington

-2-

August 20, 2002

cc: w/attachments
T. Harms, DOE-HQ
K. Watson, CBFO
R. Knerr, CBFO
A. Holland, CBFO
D. Miehl, CBFO
C. Zvonar, CBFO
B. Crape, DOE-SR
P. Hunt, SRS
M. Kokovich, SRS
F. Marcinowski, EPA
S. Monroe, EPA
R. Joglekar, EPA
E. Feltcorn, EPA
S. Zappe, NMED
P. Roush, WTS Operating Record
D. Haar, WTS
L. Greene, WTS
J. Bennett, WTS
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T. Bowden, CTAC
CBFO Mailroom

SAVANNAH RIVER SITE CERTIFICATION STATUS

The CBFO Office of the National TRU Program Manager and Quality Assurance Manager have evaluated the documentation supporting the compliance and/or continued compliance of the Savannah River Site (SRS) TRU waste programs. The recommendation to the CBFO Manager is that the SRS certification authority be continued or expanded to include the following activities evaluated during audits A-02-06 and A-02-20: acceptable knowledge, headspace gas sampling and analysis (including compositing), real-time radiography, and visual examination of contact-handled retrievably stored debris waste to support the CCP characterization activities. It is also required that SRS not ship any waste to the WIPP that was characterized using the SRS nondestructive assay system until the EPA issues approval of that system. Attachments 2 and 3 provide complete lists of applicable procedures and systems, including those evaluated during audits A-02-06 and A-02-20. The specific procedures and systems evaluated during each audit are listed in the respective audit reports.

The following SRS characterization processes for retrievably stored debris waste in support of the CCP are currently approved:

- acceptable knowledge
- headspace gas sampling and analysis (including compositing)
- real-time radiography
- visual examination
- transportation

The CCP processes certified February 27, 2002 for retrievably stored debris waste at SRS include:

- acceptable knowledge
- single sample manifold headspace gas sampling and analysis
- real-time radiography
- nondestructive assay using the IPAN/GEA system
- transportation (certified January 28, 2002).

STATUS

All program elements are complete.

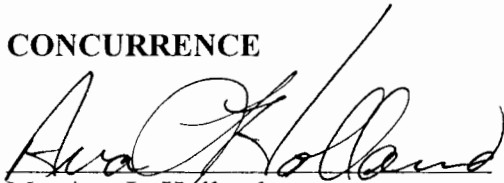
- ✓ The following SRS required program documents have been approved and are currently in place that demonstrate compliance with CBFO upper-tier documents and other CBFO requirements:
 - ❑ **Quality Assurance Project Plans (QAPjPs)**
 - SRS (*Savannah River Site WIPP Disposal Program Quality Assurance Project Plan, WSRC-RP-99-01097, Revision 3*)
 - ❑ **Waste Certification Plans (WCPs)**
 - SRS (*Savannah River Site WIPP Disposal Program Waste Certification Plan, WSRC-RP-01095, Revision 3*)
 - ❑ **Quality Assurance Plans**
 - SRS (*Savannah River Site WIPP Disposal Program Quality Assurance Program Document, WSRC-RP-99-01119, Revision 3*)

- TRAMPAC and TRAMPAC QA Plan**
 - SRS (*Savannah River Site WIPP Disposal Program TRUPACT II Authorized Methods for Payload Control*, WSRC-RP-99-01120, Revision 4)
- Certified systems
 - See attachment 2 for a complete list of currently certified SRS/CCP systems
- Standard operating procedures
 - See attachment 3 for a list of all currently approved SRS/CCP procedures. See respective audit reports for specific procedures evaluated during A-02-06 and A-02-20
- ✓ SRS/CCP participated in the following performance demonstration programs (PDPs):
 - NDA - SRS PDP participation was satisfactory in cycle 8A (Memo – CBFO:NTP:MRB:VW-01-1783 dated November 20, 2001) and CCP PDP participation was satisfactory in cycle 8A (Memo - CBFO:NTP:MRB:VW-01-1794, dated November 26, 2001).
 - HSG – SRS PDP participation was satisfactory in cycle 16A (Memo – CBFO:NTP:MRB:VW:02-2201, dated April 4, 2002) and CCP PDP participation was satisfactory in cycle 16A (CBFO:NTP:MRB:VW:02-2570, dated April 12, 2001)
- ✓ EPA Approvals
 - Letter dated April 3, 2001 certified heterogeneous debris waste
 - Letter dated February 5, 2002 certified the CCP activities at SRS
 - Letter dated July 10, 2002 contained findings for AK and nondestructive assay. The AK finding was resolved, but the nondestructive assay finding is still open. Therefore, EPA approval is still pending and no waste will be shipped until the finding is closed and EPA issues another letter.
- ✓ NMED Approvals
 - Letter dated February 1, 2002 approved SRS/CCP Final Audit Report A-02-09.
 - Letter dated August 8, 2002 approved SRS for debris waste characterization.
- ✓ Previous CBFO certification authorities
 - Memo dated April 16, 2001 issued transportation and waste certification authority for heterogeneous debris waste stream SR-T001-221F-HET
 - Memo dated February 27, 2002 issued waste certification authority to SRS to use and support the CCP waste characterization and transportation activities.
- ✓ Audits
 - SRS -- A-02-06 (Re-Certification Audit – December 2001)
 - SRS – A-02-20 (Certification Audit for Compositing and Canister Cleaning Operations, June 2002)
- ✓ Outstanding CARs
 - There are no outstanding CARs associated with either audit A-02-06 or A-02-20.

RECOMMENDATION

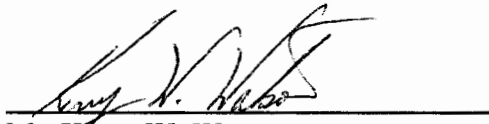
The recommendation to the CBFO Manager is to expand the SRS transportation and waste certification authority to include the activities evaluated during audits A-02-06 and A-02-20: acceptable knowledge, headspace gas sampling and analysis (including compositing), real-time radiography, and visual examination of contact-handled retrievably stored debris waste to support the CCP characterization activities. It is also required that SRS not ship any waste to the WIPP that was characterized using the SRS nondestructive assay system until the EPA issues approval of that system. It is recommended that the SRS certification authorities be limited to those systems and processes previously certified and those audited during audit A-02-06 and A-02-20. Attachments 2 and 3 are lists of systems and procedures that constitute the bounds of the SRS transportation and waste certification authority. Any new or revised system, process, or procedure must be subject to evaluation and approval prior to implementation.

CONCURRENCE



Ms. Ava L. Holland
CBFO Quality Assurance Manager

8/20/02
Date



Mr. Kerry W. Watson
CBFO Assistant Manager
National TRU Program

8/19/02
Date

SRS and CCP@SRS Certified Procedures List

	Procedure Number	Procedure Title
1.	3E, Procedure 1.7	Supplier Deviation Disposition Request for Procurement Specifications
2.	4B, Procedure 4.0	Qualification and Certification Programs
3.	5Q1.1, Procedure 133	Radiological Surveys
4.	CCP-PO-001	CCP Transuranic Waste Characterization Quality Assurance Project Plan
5.	CCP-PO-002	CCP Transuranic Waste Certification Plan
6.	CCP-PO-004	CCP/SRS Interface Document
7.	CCP-PO-005	CCP Central Characterization Project Remote Facility Conduct of Operations
8.	CCP-PO-008	CCP Quality Assurance Administrative Program
9.	CCP-QP-001	CCP Graded Approach
10.	CCP-QP-002	CCP Training and Qualification Plan
11.	CCP-QP-004	CCP Corrective Action Management
12.	CCP-QP-005	CCP TRU Nonconforming Item Reporting and Control
13.	CCP-QP-006	CCP Corrective Action Reporting and Control
14.	CCP-QP-007	CCP Document Control
15.	CCP-QP-008	CCP Records Management
16.	CCP-QP-009	CCP Work Control Process
17.	CCP-QP-010	CCP Document Preparation and Approval
18.	CCP-QP-011	CCP Notebooks & Logbooks
19.	CCP-QP-012	CCP Indoctrination Plan
20.	CCP-QP-013	CCP QAPD Matrix
21.	CCP-QP-015	CCP Procurement
22.	CCP-QP-016	CCP Control of Measuring, Testing, and Data Collection Equipment
23.	CCP-QP-017	CCP Identification and Control of Items
24.	CCP-QP-018	CCP Management Assessments
25.	CCP-QP-019	CCP Quality Assurance Reporting to Management
26.	CCP-QP-020	CCP Independent Assessments
27.	CCP-QP-021	CCP Surveillance Program
28.	CCP-QP-022	CCP TRU Software Quality Assurance
29.	CCP-QP-023	CCP Handling, Storage, and Shipping
30.	CCP-QP-024	CCP Certification of CCP Audit Personnel
31.	CCP-QP-026	CCP Inspection Control
32.	CCP-QP-027	CCP Test Control
33.	CCP-QP-028	CCP Records Filing, Inventorying, Scheduling, and Dispositioning
34.	CCP-TP-001	CCP Project Level Data Validation and Verification
35.	CCP-TP-002	CCP Reconciliation of DQOs and Reporting Characterization Data
36.	CCP-TP-003	CCP Sampling Design and Data Analysis for RCRA Characterization

SRS and CCP@SRS Certified Procedures List

	Procedure Number	Procedure Title
37.	CCP-TP-005	CCP Acceptable Knowledge Documentation
38.	CCP-TP-007	CCP Single Sample Manifold Headspace Gas Sampling and Analysis Procedure
39.	CCP-TP-009	CCP Single Sample Manifold Data Handling Procedure
40.	CCP-TP-011	CCP Radiography Inspection Operating Procedure
41.	CCP-TP-022	CCP Mobile IPAN/GEA Maintenance Procedure
42.	CCP-TP-023	CCP Mobile IPAN/GEA System Mobilization, Power up, and Demobilization Procedure
43.	CCP-TP-024	CCP Mobile IPAN/GEA Operating and Data Generation Level Validation Procedure
44.	CCP-TP-025	CCP Mobile IPAN/GEA Expert Analysis Procedure
45.	CCP-TP-026	CCP IPAN/GEA Calibration Procedure
46.	CCP-TP-028	CCP Radiographic Test and Training Drum Requirements
47.	CCP-TP-029	CCP Single-Sample Manifold Headspace Gas Sampling and Analysis Methods and Equipment Calibration
48.	CCP-TP-030	CCP TRU Waste Certification and WWIS Data Entry
49.	CCP-TP-032	CCP Single Sample Manifold Data Validation Procedure
50.	CCP-TP-035	CCP Container Management
51.	CCP-TP-057	CCP Project Level Data Validation and Verification for Headspace Gas Sampling and Analysis
52.	SP-SW-074	Segmented Gamma Scanner (SGS) Test Drum Assembly
53.	SP-SW-077	Passive Active Neutron (PAN) Assay System Test Drum Assembly
54.	SP-SW-085	Passive Active Neutron (PAN) Assay System Upgrade Test
55.	SP-SW-088	PAN Standard Drum Reconciliation
56.	SP-SW-092	Collecting Annual Field Reference Standard and Equipment Blank Sample
57.	SP-SW-093	PAN Standard Drum Reconciliation
58.	SP-SW-095	Headspace Gas Sampling of Empty Drums
59.	SP-SW-098	Passive Active Neutron (PAN) System Minimum Detectable Concentration (MDC) Assays
60.	SP-SW-099	Collecting Field Reference Standard and Equipment Blank Samples
61.	SP-SW-099.1	Collecting Field Reference Standard and Equipment Blank Samples
62.	SP-SW-106	Collecting Field Reference Standard and Equipment Blank Samples
63.	SW15.7 SOP-WWIS-001	Waste to WIPP Information System (WWIS) Data Entry Operations
64.	SW15.7-IMP-HSGAR-01	WIPP Disposal Program Gas Analysis Rounds
65.	SW15.7-INSP-HSG-01	Gas Analysis Systems Inspections
66.	SW15.7-INSP-LIFT-01	Ballymore Elevating Work Platform Inspections
67.	SW15.7-INSP-NDE-01	Non-Destructive Examination Test Drum Assembly
68.	SW15.7-INSP-NDE-02	WIPP Disposal Program Radiography Test Drum Observation
69.	SW15.7-INSP-PDP-01	WIPP Disposal Program Non-Destructive Assay Performance Demonstration Program (PDP)
70.	SW15.7-INSP-PDP-02	WIPP Disposal Program Headspace Gas Analysis Performance Demonstration Program (PDP)
71.	SW15.7-INSP-TRUPACT-	TRUPACT-II Quarterly Tools/Materials Inventory Inspection

SRS and CCP@SRS Certified Procedures List

	Procedure Number	Procedure Title
	01	
72.	SW15.7-SOP-CCCP-01	Canister Cleaning and Certification
73.	SW15.7-SOP-CONT-01	WIPP Waste Container Selection, Preparation, and Deficiency Operations
74.	SW15.7-SOP-HGEC-01	Headspace Gas Equipment Certification
75.	SW15.7-SOP-HSDR-01	Headspace Gas Analysis Data Review
76.	SW15.7-SOP-HSGA-01	Headspace Gas Analysis Operations
77.	SW15.7-SOP-HSGS-01	Headspace Gas Sampling
78.	SW15.7-SOP-NDA-01	Non-Destructive Assay (NDA) Operations
79.	SW15.7-SOP-PAN-01	Passive Active Neutron System Verification of Calibration
80.	SW15.7-SOP-PSR-01	PAN Standard Drum Reconciliation
81.	SW15.7-SOP-PYLD-01	TRUPACT-II Package Creation
82.	SW15.7-SOP-PYLD-02	TRUPACT-II Shipping Payload Assembly
83.	SW15.7-SOP-RTR-01	Real Time Radiography (RTR)/X-Ray Operations
84.	SW15.7-SOP-SGS-01	Segmented Gamma Scanner Verification of Calibration
85.	SW15.7-SOP-TRUPT-01	TRUPACT-II Handling/Loading
86.	SW15.7-SOP-TRUPT-02	TRUPACT-II O-Ring Leak Testing
87.	SW15.7-SOP-TRUPT-03	TRUPACT-II Infrequent Operations
88.	SW15.7-SOP-TVEF-01	WIPP Disposal Program Operating Procedure Manual Standard Operating Procedure
89.	SW15.7-SOP-WEIGH-01	Toledo Scale Operations
90.	SW18 WP-AP-0015	WIPP Disposal Program Data Generation Level Review for Headspace Gas Analysis
91.	SW18 WP-AP-008	WIPP Disposal Program Waste Certification Statement Preparation
92.	SW18 WP-AP-009	WIPP Disposal Program Waste Stream Determination and Reporting
93.	SW18-WP-AP-0001	WIPP Disposal Program Process Control
94.	SW18-WP-AP-0002	WIPP Disposal Program Acceptable Knowledge
95.	SW18-WP-AP-0003	WIPP Disposal Program Project Level Validation and Verification
96.	SW18-WP-AP-0004	WIPP Disposal Program Quality Assurance Trending
97.	SW18-WP-AP-0005	WIPP Disposal Program Quality Assurance Inspections
98.	SW18-WP-AP-0007	WIPP Records Management
99.	SW18-WP-AP-0010	WIPP Disposal Program Waste Stream Profile Form Preparation and Reconciliation with Data Quality Objectives
100.	SW18-WP-AP-0011	QC/Measurement Control: HGAS Laboratory
101.	SW18-WP-AP-0012	TRUPACT-II Transportation Arrangement
102.	SW18-WP-AP-0013	Headspace Gas Analysis Journal
103.	SW18-WP-AP-0014	WIPP Disposal Program Data Generation Level Review for Headspace Gas Sampling
104.	SW18-WP-AP-0016	WIPP Disposal Program Data Generation Level Review for Visual Examination
105.	SW18-WP-AP-0017	WIPP Disposal Program Data Generation Level Review for RTR/X-Ray

SRS and CCP@SRS Certified Procedures List

	Procedure Number	Procedure Title
106.	SW18-WP-AP-0018	Data Generation Level Review for NDA
107.	SW18-WP-AP-0019	Computer Configuration Control: HSGA Laboratory
108.	SW18-WP-AP-0020	Headspace Gas Analysis Batch Data Review Reference Tables
109.	SW18-WP-AP-0021	NDA Systems Measurement Control Program
110.	SWD-SWT-98-0056	SRS WIPP Disposal Program Operations Training Program Description
111.	SWD-SWT-98-0058	SRS WIPP Disposal Program Technical Support Staff Training Program Description
112.	SW-QI-1171	Records Management
113.	WSRC 1.1, Procedure 1.1	Procedure Administration
114.	WSRC 1-01, Charter 6.12	Quality Managers Council
115.	WSRC 1-01, Policy 5.35	Corrective Action Program
116.	WSRC 12Q, FEB-1	Facility Evaluation Board
117.	WSRC 19Q, TSM 1.02	General Transportation Requirements for Radioactive and Non-Radioactive Hazardous Materials
118.	WSRC 19Q, TSM 2.02	Radioactive Material Shipment and Transfer
119.	WSRC 1B, MRP 3.32	Document Control
120.	WSRC 1B, MRP 4.21	Problem Identification and Resolution Process
121.	WSRC 1B, Procedure 3.31	Records Management
122.	WSRC 1Q, QAP 1-1	Organization
123.	WSRC 1Q, QAP 11-1	Test Control
124.	WSRC 1Q, QAP 1-2	Stop Work
125.	WSRC 1Q, QAP 12-1	Control of Measuring and Test Equipment
126.	WSRC 1Q, QAP 12-2	Control of Installed Process Instrumentation
127.	WSRC 1Q, QAP 13-1	Packaging, Handling, Shipping, and Storage
128.	WSRC 1Q, QAP 14-1	Inspection, Test, and Operating Status
129.	WSRC 1Q, QAP 15-1	Control of Nonconforming Items
130.	WSRC 1Q, QAP 15-2	Control of Nonconforming Activities
131.	WSRC 1Q, QAP 16-1	Corrective Action Reports
132.	WSRC 1Q, QAP 17-1	Quality Assurance Records
133.	WSRC 1Q, QAP 18-2	Quality Assurance Surveillance
134.	WSRC 1Q, QAP 18-3	Quality Assurance External Audits
135.	WSRC 1Q, QAP 18-4	Management Assessments
136.	WSRC 1Q, QAP 18-6	Quality Assurance Internal Audits
137.	WSRC 1Q, QAP 18-7	Quality Assurance Supplier Surveillance
138.	WSRC 1Q, QAP 19-2	Quality Improvement
139.	WSRC 1Q, QAP 20-1	Software Quality Assurance
140.	WSRC 1Q, QAP 2-1	Quality Assurance Program
141.	WSRC 1Q, QAP 2-2	Personnel Training and Qualification

SRS and CCP@SRS Certified Procedures List

	Procedure Number	Procedure Title
142.	WSRC 1Q, QAP 2-3	Control of Research and Development Activities
143.	WSRC 1Q, QAP 2-4	Auditor/Lead Auditor Qualification and Certification
144.	WSRC 1Q, QAP 2-5	Qualification and Certification of Independent Inspection Personnel
145.	WSRC 1Q, QAP 2-7	Program Requirements for Analytical Measurement Systems
146.	WSRC 1Q, QAP 4-1	Procurement Document Control
147.	WSRC 1Q, QAP 5-1	Instruction, Procedures, and Drawings
148.	WSRC 1Q, QAP 6-1	Document Control
149.	WSRC 1Q, QAP 7-2	Control of Purchased Items and Services
150.	WSRC 1Q, QAP 8-1	Identification and Control of Items
151.	WSRC 1Q, QAP 9-1	Control of Processes
152.	WSRC 1Q, QAP 9-2	Control of Nondestructive Examination
153.	WSRC 1Q, QAP 9-4	Work Processes
154.	WSRC 2S, Procedure 1.3	Procedure Compliance
155.	WSRC-RP-99-00221	Savannah River Site WIPP Disposal Program Software Inventory
156.	WSRC-RP-99-00359	Savannah River Site WIPP Disposal Program Software Quality Assurance Plan
157.	WSRC-RP-99-01095	Savannah River Site WIPP Disposal Program Waste Certification Plan
158.	WSRC-RP-99-01097	Savannah River Site WIPP Disposal Program Quality Assurance Project Plan
159.	WSRC-RP-99-01119	Savannah River Site WIPP Disposal Program Quality Assurance Program Document
160.	WSRC-RP-99-01120	Savannah River Site WIPP Disposal Program TRUPACT-II Authorized Methods for Payload Control (TRAMPAC)