

United States Government

Carlsbad Field Office
Carlsbad, New Mexico 88221

memorandum

DATE: September 30, 2002

REPLY TO
ATTN OF: CBFO:NTP:KWW:VW:02-3023:UFC:5822

SUBJECT: Annual Re-Evaluation of LANL TRU Waste Program Compliance

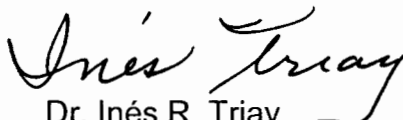
TO: James Nunz, TRU Manager, Los Alamos Site Office



The Carlsbad Field Office (CBFO) has completed its annual re-evaluation of the Los Alamos National Laboratory's (LANL) transuranic (TRU) waste program. The annual re-certification audit (A-02-04) was conducted October 22-26, 2001. The LANL technical and quality assurance programs were determined to be in compliance with the "Waste Analysis Plan" (WAP) of the *WIPP Hazardous Waste Facility Permit* (HWFP), the *Quality Assurance Program Document* (QAPD), the *CH Transuranic Waste Acceptance Criteria for the Waste Isolation Pilot Plant* (WIPP CH-WAC), the *TRUPACT-II Authorized Methods for Payload Control* (TRAMPAC) and other CBFO requirements and standards.

Based on the annual re-evaluation audit A-02-04, certification authority is continued for following activities: transportation, visual examination, real-time radiography, and nondestructive assay (FRAM, HENC, and TGS) of contact-handled TRU debris waste. However, headspace gas sampling and analysis data must have been collected prior to October 15, 2001 and is limited to those containers listed in attachment 4 of this document. See the attachments to this memorandum for the complete lists of certified procedures, documents, and systems.

TRU waste characterization, certification, or transportation using significantly revised or new processes, procedures, or systems must be evaluated by the CBFO prior to their implementation.


Dr. Inés R. Triay
Manager

Attachments

020936



James Nunz

-2-

September 30, 2002

cc: w/attachments
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OCT 2002

LANL SITE CERTIFICATION PROGRAM STATUS

The CBFO Office of the National TRU Program Manager and Quality Assurance Manager have evaluated the documentation supporting the continued compliance of the Los Alamos National Laboratory's (LANL) TRU waste programs. The recommendation to the CBFO Manager is that the LANL certification authority be continued for the activities evaluated during the annual re-certification audit A-02-04 conducted October 22-26, 2001 with the exception of headspace gas sampling and analysis activities. LANL may ship only those containers that were stipulated in the closure package for CAR 02-009. A list of those containers can be found in Attachment 4 of this letter. Attachments 2 and 3 provide complete lists of certified procedures and systems, including those evaluated during audit A-02-04.

The following LANL characterization processes (with limitations indicated) are currently approved:

- Acceptable knowledge
- Radiography
- Transportation
- Visual examination
- Non-destructive assay using the FRAM, HENC, and TGS assay systems. The Pan system that was certified on April 5, 2001 is no longer being used and therefore was not evaluated during A-02-04.
- Headspace gas sampling and analysis data must have been collected prior to October 15, 2001 and limited to the specific containers listed in the closure package for CAR-02-009 and attachment 4 of this letter.

STATUS

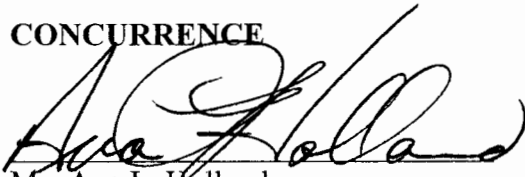
- All necessary program elements have been determined to be complete
- The following LANL required site documents have been revised, approved, and are in place identifying how the site complies with the WIPP Hazardous Waste Facility Permit WAP, CAO QAPD, TRAMPAC, and WIPP CH-WAC requirements:
 - WCP – *Los Alamos National Laboratory Transuranic Waste Certification Plan*, TWCP-PLAN-0.2.4-001, Rev. 6, May 22, 2002
 - QAPjP – *Los Alamos National Laboratory Transuranic Waste Quality Assurance Project Plan*, TWCP-PLAN-0.2.3-001, Rev. 6, May 23, 2002
 - QAP – *Quality Assurance Management Plan*, TWCP-PLAN-0.2.6-001, Rev. 4, August 2000
 - TRAMPAC and TRAMPAC QA PLAN – *Los Alamos National Laboratory Compliance Plan for TRUPACT-II Authorized Methods for Payload Control (TRAMPAC)*, TWCP-PLAN-6.0, Rev. 0, May 31, 2002
 - Packaging QA Plan – (Section 7.0 of TRAMPAC)
 - Standard operating procedures (see attachment 3 for complete procedure lists)
- LANL successfully participated in the following performance demonstration programs (PDPs):
 - NDA PDP participation was satisfactory in cycle 8A for the TGS, HENC, and CTEN systems, memo CBFO:NTP:MRB:VW:01-1787 dated November 20, 2001

- HSG PDP participation was satisfactory in cycle 15A for the prototype LANL-HGAS, memo CBFO:NTP:MRB:VW:01-1013 dated May 10, 2001, and the LANL-HGAS-II system operated under CCO-TP-031, memo CBFO:NTP:MRB:VW:02-1037 dated June 11, 2001.
- CAO conducted re-certification audit A-02-04 on October 22-25, 2001 and determined that the technical and quality assurance programs for the above listed processes continue to be adequate. NMED participated in this audit and approved the final audit report on August 8, 2002.
- CARs 02-007 through 02-011 that were issued during audit A-02-04 were successfully implemented and closed. No significant CARs remain open.

RECOMMENDATION

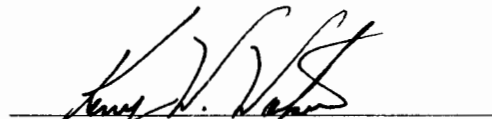
The recommendation to the CBFO Manager is that the LANL certification authority be continued for the activities evaluated during the annual re-certification audit A-02-04 conducted October 22-26, 2001 with the exception of headspace gas sampling and analysis activities.

CONCURRENCE



Ms. Ava L. Holland
Quality Assurance Manager

9/30/02
Date



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

9/30/02
Date

LANL CERTIFIED EQUIPMENT LIST

WIPP #	Site Equipment # or Title	Site Description	Components	Software
headspace Gas				
4HG1	Headspace Gas Analysis System	Collects on-line sample of volatile organic compound gas and hydrogen and methane from headspace of drums and SWBs and performs analysis of collected samples to measure the concentrations of gases found in the drums and SWB's	Online sampling manifold including: <input type="checkbox"/> 24 canisters valves <input type="checkbox"/> pump <input type="checkbox"/> hydrogen generator <input type="checkbox"/> sample humidifier <input type="checkbox"/> Hewlett and Packard GC/MS and GC/TCD	<input type="checkbox"/> Enviroquant <input type="checkbox"/> HP Chemstation <input type="checkbox"/> HGAS BDR spreadsheet <input type="checkbox"/> HGAS MDL spreadsheet
Nondestructive Assay				
4HE1	High Efficiency Neutron Counter (HENC)	High Efficiency Neutron Counter (HENC) - The data from this system is used along with the relative isotopic data from the FRAM systems to generate quantitative isotopic information for each waste container.	Canberra High Efficiency Neutron Counter Advanced Multiplicity Shift Register (AMSR)	INCC
4TD1	Mobile Tomographic Gamma Scanner (TGS)	Mobile Tomographic Gamma Scanner (TGS) - The data from this system is used along with the relative isotopic data from the FRAM systems to generate quantitative isotopic information for each waste container.	Tomographic Gamma Scanner	<input type="checkbox"/> WIN_TGS <input type="checkbox"/> ARC_TGS <input type="checkbox"/> Orchestrator Maestro
4FR1	FRAM	FRAM - FRAM systems are used to measure the relative isotopics of all waste streams at LANL. At LANL components of a FRAM system are kept on hand assembled and validated as needed for waste measurements per TWCP-DTP-1.2-029.	<input type="checkbox"/> HPGe Detector <input type="checkbox"/> Multi-channel Analyzer <input type="checkbox"/> Liquid Nitrogen or Electro-cooler	FRAM Maestro
Non-destructive Examination				
4RR1	Mobile RTR	Mobile RTR - Radiography of waste drums and standard waste boxes	Real time X-ray	RTR field for collection of field RTR data

LANL Certified Procedures List

#	PROCEDURE NUMBER	TITLE
1.	TWCP-DTP 1.2-001	Waste Visual Examination and Packaging
2.	TWCP-DTP 1.2-002	WCRRF Procedure for Video System
3.	TWCP-DTP 1.2-006	Calculation of UCL ₉₀ Values
4.	TWCP-DTP 1.2-008	Performing Nondestructive Testing Using the Mobile Real-Time Radiography System
5.	TWCP-DTP 1.2-011	Waste Assay Using the Tomographic Gamma Scanner
6.	TWCP-DTP 1.2-015	Calculation for Determining the Number of Containers for VE
7.	TWCP-DTP 1.2-016	Calibrating the Tomographic Gamma Scanning System
8.	TWCP-DTP 1.2-025	Headspace Gas Analysis Batch Data Report Preparation
9.	TWCP-DTP 1.2-029	Determining Isotopic Ratios in Waste Containers Using the RANT PC/ FRAM Assay System
10.	TWCP-DTP 1.2-030	TRUPACT II Operations
11.	TWCP-DTP 1.2-031	Varian Porta-Test Leak Detector Procedure
12.	TWCP-DTP 1.2-032	Adjustable Center of Gravity Lift Fixture
13.	TWCP-DTP 1.2-034	Waste Transportation Certification Implementation
14.	TWCP-DTP 1.2-035	Payload Container/Assembly Selection and Off-Site Transportation of Contact-Handled TRU Waste
15.	TWCP-DTP 1.2-038	HGAS Filter Removal and Replacement for TWCP
16.	TWCP-DTP 1.2-053	Assignment of Waste Matrix Codes
17.	TWCP-DTP 1.2-059	Operating the High Efficiency Neutron Counter Using INCC
18.	TWCP-DTP 1.2-060	Calibrating the High Efficiency Neutron Counter Using the INCC
19.	TWCP-DTP 1.2-063	Preparing and Handling Waste Containers
20.	TWCP-DTP 1.2-064	Waste Characterization Data Reconciliation with Acceptable Knowledge and Acceptable Knowledge Accuracy Reporting
21.	TWCP-PLAN-0.2.3-001	Transuranic Waste Quality Assurance Project Plan
22.	TWCP-PLAN-0.2.4-001	Transuranic Waste Certification Plan
23.	TWCP-PLAN-0.2.7-001	TRU Waste Characterization Sampling Plan
24.	TWCP-QP 1.1-001	Procedure Preparation, Review, Approval, Revision, and Interim Change
25.	TWCP-QP 1.1-002	Document Control
26.	TWCP-QP 1.1-003	TWCP Training
27.	TWCP-QP 1.1-004	Records Management
28.	TWCP-QP 1.1-005	Procurement
29.	TWCP-QP 1.1-006	Software Management
30.	TWCP-QP 1.1-007	Nonconformance Reporting and Tracking
31.	TWCP-QP 1.1-008	Corrective Action Reporting and Tracking
32.	TWCP-QP 1.1-009	Surveillances
33.	TWCP-QP 1.1-010	Project Level Data Validation and Verification
34.	TWCP-QP 1.1-012	Laboratory Notebooks and Logbooks
35.	TWCP-QP 1.1-017	Chain of Custody
36.	TWCP-QP 1.1-018	Measuring and Test Equipment
37.	TWCP-QP 1.1-020	Root Cause Analysis
38.	TWCP-QP 1.1-021	Acceptable Knowledge Documentation
39.	TWCP-QP 1.1-022	PDP Blind Audit Sample Management
40.	TWCP-QP 1.1-024	Reporting Summarized Characterization Data to CAO
41.	TWCP-QP 1.1-026	Trend Analysis
42.	TWCP-QP 1.1-027	Audits
43.	TWCP-QP 1.1-028	Reconciliation of VE and RTR Information
44.	TWCP-QP 1.1-029	Grading TWCP Activities
45.	TWCP-QP 1.1-030	Work Suspension
46.	TWCP-QP 1.1-032	Hazardous Material Transportation and Tracking

#	PROCEDURE NUMBER	TITLE
47.	TWCP-QP 1.1-033	Management Assessments
48.	TWCP-QP 1.1-034	WIPP Waste Information System Data Entry
49.	TWCP-QP 1.1-035	Qualification of TWCP NDE Personnel
50.	TWCP-QP 1.1-039	Conversion of Waste Volumes to Weights
51.	TWCP-QP 1.1-040	Tracking and Reporting of Tentatively Identified Compounds

LANL Inactive or Cancelled Procedures				
#	Procedure Number	Procedure Title	Action - Reason	Date
1.	TWCP-DTP 1.2-041	Headspace Gas Sampling & Analysis Using an Automated Manifold	Deactivated – Prototype on-line system shut down	October 15, 2001
2.	TWCP-DTP 1.2-009	Waste Assay Using the Passive-Active Neutron (PAN) Assay System	Deactivated – System shut down	January 28, 2002
3.	TWCP-DTP 1.2-010	Calibrating the Mobile Passive-Active Neutron Assay System	Deactivated – System shut down	January 28, 2002

List of Containers That Can be Shipped to WIPP

BDR	Drum Number
LA00-HGAS-003	56292
LA00-HGAS-003	56292 DUP
LA00-HGAS-003	55299
LA00-HGAS-003	54861
LA00-HGAS-003	56274
LA00-HGAS-003	56157
LA00-HGAS-003	56214
LA00-HGAS-003	55235
LA00-HGAS-003	55267
LA00-HGAS-003	54898
LA00-HGAS-003	56273
LA00-HGAS-003	55294
LA00-HGAS-003	56343
LA00-HGAS-003	56351
LA00-HGAS-004	58017
LA00-HGAS-004	58017 DUP
LA00-HGAS-004	58000
LA00-HGAS-004	57186
LA00-HGAS-004	58007
LA00-HGAS-004	57782
LA00-HGAS-004	57700
LA00-HGAS-004	58005
LA00-HGAS-004	57715
LA00-HGAS-004	57786
LA00-HGAS-004	58004
LA00-HGAS-004	57703
LA00-HGAS-004	58084
LA00-HGAS-004	58082
LA00-HGAS-004	57190
LA00-HGAS-004	57718
LA00-HGAS-004	58016
LA00-HGAS-004	58015
LA00-HGAS-004	58094
LA00-HGAS-004	57791
LA00-HGAS-006	57184
LA00-HGAS-006	57184 DUP
LA00-HGAS-006	52108
LA00-HGAS-006	52653
LA00-HGAS-006	56338
LA00-HGAS-007	57783
LA00-HGAS-007	57714
LA00-HGAS-007	57787
LA00-HGAS-007	57794
LA00-HGAS-007	57795
LA00-HGAS-007	58003
LA00-HGAS-007	57783 DUP
LA00-HGAS-008	57287
LA00-HGAS-008	57287 DUP
LA00-HGAS-008	52032

LA00-HGAS-008	57207
LA00-HGAS-008	57281
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LA00-HGAS-008	57218
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LA00-HGAS-008	57284
LA00-HGAS-008	57209
LA00-HGAS-009	57208
LA00-HGAS-009	57208 DUP
LA00-HGAS-009	57003
LA00-HGAS-009	57214
LA00-HGAS-009	57213
LA00-HGAS-009	57009
LA00-HGAS-009	57510
LA00-HGAS-009	57221
LA00-HGAS-010	S862004
LA00-HGAS-010	S862004 DUP
LA00-HGAS-010	S862274
LA00-HGAS-010	S862456
LA00-HGAS-010	S855627
LA00-HGAS-010	56322
LA00-HGAS-010	54491
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LA00-HGAS-011	57505
LA00-HGAS-011	57283
LA00-HGAS-011	57264
LA00-HGAS-011	57210
LA00-HGAS-011	57506
LA00-HGAS-011	57219
LA00-HGAS-012	57012
LA00-HGAS-012	57298
LA00-HGAS-012	57298 DUP
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LA00-HGAS-012	57504
LA00-HGAS-012	57014
LA00-HGAS-013	57025
LA00-HGAS-013	57025 DUP
LA00-HGAS-014	55851
LA00-HGAS-014	56607
LA00-HGAS-014	56611
LA00-HGAS-014	56929
LA00-HGAS-014	57162
LA00-HGAS-014	57146
LA00-HGAS-014	57157
LA00-HGAS-014	57118
LA00-HGAS-014	57118 DUP

LA00-HGAS-014	57147
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LA00-HGAS-015	56636
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LA00-HGAS-016	57710
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LA00-HGAS-016	57159
LA00-HGAS-016	57151
LA00-HGAS-016	56892
LA00-HGAS-016	57171
LA00-HGAS-016	OCS
LA00-HGAS-016	OB
LA00-HGAS-017	57733
LA00-HGAS-017	57733 DUP
LA00-HGAS-017	57764
LA00-HGAS-017	57741
LA00-HGAS-017	57108
LA00-HGAS-018	OCS
LA00-HGAS-018	OB
LA00-HGAS-018	55731
LA00-HGAS-018	57723
LA00-HGAS-018	57723 DUP
LA00-HGAS-018	57722
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LA00-HGAS-018	57728
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LA00-HGAS-019	57721
LA00-HGAS-019	58006
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LA00-HGAS-020	54163 DUP

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LA00-HGAS-021	52332
LA00-HGAS-021	54146
LA00-HGAS-021	54146 DUP
LA01-HGAS-001	57961
LA01-HGAS-001	58150
LA01-HGAS-001	57957
LA01-HGAS-001	58186
LA01-HGAS-001	58118
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LA01-HGAS-001	57951 DUP
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LA01-HGAS-002	58152
LA01-HGAS-002	58138
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LA01-HGAS-017	54543
LA01-HGAS-017	55953
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