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memorandum

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Carlsbad Field Office
Carlsbad, New Mexico 88221

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, HENG, 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
cc: w/attachments
T. Harms, DOE-HQ
K. Watson, CBFO
R. Kheir, CBFO
A. Holland, CBFO
C. Zvonar, CBFO
R. Taft, DOE-ID
C. Murnane, DOE-AOO
P. Rogers, LANL
F. Marcinowski, EPA
S. Monroe, EPA
R. Joglekar, EPA
E. Feltcorn, EPA
S. Zappe, NMED
P. Roush, WTS Operating Record
L. Greene, WTS
J. Bennett, WTS
D. Standiford, WTS
M. Strum, WTS
W. Ledford, CTAC
T. Bowden, CTAC
CBFO Mailroom
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
  - 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

- 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

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

9/30/02  
9/30/02
# LANL CERTIFIED EQUIPMENT LIST

<table>
<thead>
<tr>
<th>WIPP #</th>
<th>Site Equipment # or Title</th>
<th>Site Description</th>
<th>Components</th>
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<tr>
<td>Headspace Gas</td>
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<tr>
<td>4HG1</td>
<td>Headspace Gas Analysis System</td>
<td>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</td>
<td>Online sampling manifold including: 24 canisters valves, pump, hydrogen generator, sample humidifier, Hewlett and Packard GC/MS and GC/TCD</td>
<td>Enviroquant, HP Chemstation, HGAS BDR spreadsheet, HGAS MDL spreadsheet</td>
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<td>Nondestructive Assay</td>
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<td>4HE1</td>
<td>High Efficiency Neutron Counter (HENC)</td>
<td>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.</td>
<td>Canberra High Efficiency Neutron Counter Advanced Multiplicity Shift Register (AMSR)</td>
<td>INCC</td>
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<td>4TD1</td>
<td>Mobile Tomographic Gamma Scanner (TGS)</td>
<td>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.</td>
<td>Tomographic Gamma Scanner</td>
<td>WIN_TGS, ARC_TGS, Orchestrator Maestro</td>
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<td>4FR1</td>
<td>FRAM</td>
<td>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.</td>
<td>HPGe Detector, Multi-channel Analyzer, Liquid Nitrogen or Electro-cooler</td>
<td>FRAM Maestro</td>
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<td>Non-destructive Examination</td>
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<td>4RR1</td>
<td>Mobile RTR</td>
<td>Mobile RTR - Radiography of waste drums and standard waste boxes</td>
<td>Real time X-ray</td>
<td>RTR field for collection of field RTR data</td>
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## LANL Certified Procedures List

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<tr>
<th>#</th>
<th>PROCEDURE NUMBER</th>
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<td>1.</td>
<td>TWCP-DTP 1.2-001</td>
<td>Waste Visual Examination and Packaging</td>
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<td>2.</td>
<td>TWCP-DTP 1.2-002</td>
<td>WCRRF Procedure for Video System</td>
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<td>3.</td>
<td>TWCP-DTP 1.2-006</td>
<td>Calculation of UCL&lt;sub&gt;90&lt;/sub&gt; Values</td>
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<td>4.</td>
<td>TWCP-DTP 1.2-008</td>
<td>Performing Nondestructive Testing Using the Mobile Real-Time Radiography System</td>
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<td>TWCP-DTP 1.2-011</td>
<td>Waste Assay Using the Tomographic Gamma Scanner</td>
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<td>TWCP-DTP 1.2-015</td>
<td>Calculation for Determining the Number of Containers for VE</td>
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<td>7.</td>
<td>TWCP-DTP 1.2-016</td>
<td>Calibrating the Tomographic Gamma Scanning System</td>
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<td>TWCP-DTP 1.2-025</td>
<td>Headspace Gas Analysis Batch Data Report Preparation</td>
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<td>9.</td>
<td>TWCP-DTP 1.2-029</td>
<td>Determining Isotopic Ratios in Waste Containers Using the RANT PC/FRAM Assay System</td>
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<td>TWCP-DTP 1.2-030</td>
<td>TRUPACT II Operations</td>
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<td>TWCP-DTP 1.2-031</td>
<td>Varian Porta-Test Leak Detector Procedure</td>
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<td>TWCP-DTP 1.2-032</td>
<td>Adjustable Center of Gravity Lift Fixture</td>
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<td>TWCP-DTP 1.2-034</td>
<td>Waste Transportation Certification Implementation</td>
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<td>TWCP-DTP 1.2-035</td>
<td>Payload Container/Assembly Selection and Off-Site Transportation of Contact-Handled TRU Waste</td>
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<td>TWCP-DTP 1.2-038</td>
<td>HGAS Filter Removal and Replacement for TWCP</td>
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<td>TWCP-DTP 1.2-053</td>
<td>Assignment of Waste Matrix Codes</td>
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<td>TWCP-DTP 1.2-059</td>
<td>Operating the High Efficiency Neutron Counter Using INCC</td>
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<td>Calibrating the High Efficiency Neutron Counter Using the INCC</td>
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<td>TWCP-DTP 1.2-063</td>
<td>Preparing and Handling Waste Containers</td>
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<td>TWCP-DTP 1.2-064</td>
<td>Waste Characterization Data Reconciliation with Acceptable Knowledge and Acceptable Knowledge Accuracy Reporting</td>
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<td>TWCP-PLAN-0.2.3-001</td>
<td>Transuranic Waste Quality Assurance Project Plan</td>
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<td>TWCP-PLAN-0.2.4-001</td>
<td>Transuranic Waste Certification Plan</td>
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<td>TWCP-PLAN-0.2.7-001</td>
<td>TRU Waste Characterization Sampling Plan</td>
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<td>TWCP-QP 1.1-001</td>
<td>Procedure Preparation, Review, Approval, Revision, and Interim Change</td>
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<td>Nonconformance Reporting and Tracking</td>
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<td>TWCP-QP 1.1-008</td>
<td>Corrective Action Reporting and Tracking</td>
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<td>TWCP-QP 1.1-009</td>
<td>Surveillances</td>
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<td>TWCP-QP 1.1-010</td>
<td>Project Level Data Validation and Verification</td>
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<td>TWCP-QP 1.1-012</td>
<td>Laboratory Notebooks and Logbooks</td>
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<td>TWCP-QP 1.1-017</td>
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<td>TWCP-QP 1.1-018</td>
<td>Measuring and Test Equipment</td>
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<td>TWCP-QP 1.1-020</td>
<td>Root Cause Analysis</td>
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<td>TWCP-QP 1.1-021</td>
<td>Acceptable Knowledge Documentation</td>
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<td>TWCP-QP 1.1-022</td>
<td>PDP Blind Audit Sample Management</td>
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<td>TWCP-QP 1.1-024</td>
<td>Reporting Summarized Characterization Data to CAO</td>
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<td>TWCP-QP 1.1-026</td>
<td>Trend Analysis</td>
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<td>TWCP-QP 1.1-028</td>
<td>Reconciliation of VE and RTR Information</td>
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<td>TWCP-QP 1.1-029</td>
<td>Grading TWCP Activities</td>
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<td>TWCP-QP 1.1-030</td>
<td>Work Suspension</td>
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<td>46.</td>
<td>TWCP-QP 1.1-032</td>
<td>Hazardous Material Transportation and Tracking</td>
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### PROCEDURE NUMBER
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<td>47.</td>
<td>TWCP-QP 1.1-033</td>
<td>Management Assessments</td>
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<td>TWCP-QP 1.1-034</td>
<td>WIPP Waste Information System Data Entry</td>
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<td>TWCP-QP 1.1-035</td>
<td>Qualification of TWCP NDE Personnel</td>
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<td>50.</td>
<td>TWCP-QP 1.1-039</td>
<td>Conversion of Waste Volumes to Weights</td>
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<td>51.</td>
<td>TWCP-QP 1.1-040</td>
<td>Tracking and Reporting of Tentatively Identified Compounds</td>
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### LANL Inactive or Cancelled Procedures

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<th>Procedure Title</th>
<th>Action - Reason</th>
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<tbody>
<tr>
<td>1.</td>
<td>TWCP-DTP 1.2-041</td>
<td>Headspace Gas Sampling &amp; Analysis Using an Automated Manifold</td>
<td>Deactivated - Prototype on-line system shut down</td>
<td>October 15, 2001</td>
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<td>3.</td>
<td>TWCP-DTP 1.2-010</td>
<td>Calibrating the Mobile Passive-Active Neutron Assay System</td>
<td>Deactivated - System shut down</td>
<td>January 28, 2002</td>
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List of Containers That Can be Shipped to WIPP

LANL Annual Re-Certification Letter
A-02-04
September 2002
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