

Subject: NMED concerns with LANL Audit Report A-02-30
From: Steve Zappe <Steve_Zappe@nmenv.state.nm.us>
Date: Mon, 09 Dec 2002 13:22:48 -0700
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Steve, Wayne -

Attached is a memo regarding Trinity Engineering's review of the recent LANL audit report. NMED believes you need to address the concerns in the memo and resubmit a revised audit report after performing an adequate QC check of the report and B6 checklists. After resubmittal, NMED will review and evaluate the revised audit report for approval.

Please try to improve the quality of future submittals. We have been tolerant of minor typographical errors and misreferences in the past, but this report simply doesn't meet our standards, and it should reflect what you believe is quality work. Thanks!

Steve

021214



To: Steve Zappe
From: Connie Walker and June Dreith
Date: December 6, 2002
RE: LANL Audit Report; A-02-30

Upon initiation of the LANL Audit Report (A-02-30) review, several errors, omissions, and misreferences were noted that substantially impact our ability to review this document, so much so that approval of the audit report cannot be advocated without revision of the Audit Report. While the entire report needs to be examined for errors, the following focuses on major problems associated with Table B6-1, the Waste Analysis Plan checklist. For example, references provided in this checklist are incorrect; the checklist references procedure sections that do not exist, documents that were not provided with the Audit Report, or earlier revisions of procedures that were not included on the CD-ROM.

The following are specific examples of these issues:

1. The LANL procedure provided on the CD-ROM is not always the same version as the procedures referenced by the CBFO auditors in the LANL checklists. For example, in the Waste Analysis Plan Checklist (Table B6-1) Checklist item #2, the CBFO Auditor reference DTP-1.2-064.R4, but the CD ROM contains version R-5. Another incorrect reference was found in Table 6-1, checklist item 8; the checklist referenced QP-1.1-024, version 6, but version 7 was included on the CD-ROM. The report must clarify all references included in the Checklist and ensure that the revisions provided on the CD ROM are the same versions referenced in the Checklists.
2. There are documents referenced in the checklists that are not provided on the CD ROM or in hard copy. For example, on Checklist Table B6-1, checklist item #11, the CBFO Auditor referenced DTP-1.2-041, R4. This document was not provided on the CD ROM. Document DTP-1.2-025, R4 is referenced but is not provided for review on hard copy or on the CD ROM. The same is true of document DTP-1.2-035, R5. These incorrect references appear to impact numerous checklist items (e.g. checklist items 11,12,18,19,20,28,30,32,33,36,37 etc.). Missing document DTP-1.2-035, R5, impacts checklist items 72 and 73.
3. There are numerous checklist items where only a general reference citation is provided but more specific sectional citations should have been provided. In some cases, such as checklist items #8, 11, 12 etc., an entire laundry list of batch data reports are referenced with no specific page or sectional reference. These batch data reports are complex, and the information is difficult to locate under the best of circumstances. However, with no specific references to pages or sections, it can be nearly impossible to locate the specific information referenced in the checklist item without more specific information. By not providing detailed references, it is difficult to locate the specific information requested in the checklist item. This seems to be a pervasive problem in this checklist.

4. There are numerous incorrect document section references throughout checklist B6-1. The following is a summary of some of the incorrect references found. Although this list is not all-inclusive, it provides examples of section misreferences and related errors noted:

- Item #4. The checklist references QP-1.1-021, R6, Section 6.2.5.4. There is no such section.
- Item #8 The checklist references DTP-1.2-001, R12 Attachment 3, Section 3.5.34. Attachment 3 only goes to Section 3.4 (page 3 of 19).
- Item #8 The checklist references QP-1.1-021 R6, Section 1.1. There is no Section 1.1. The section only goes to Section 1.0.
- Item #8 QP-1.1-021 R6, Section 6.2.7.1. There is no Section with this number.
- Item #9 The checklist references QP-1.021, R6 Section 6.2.8-11. There is no Section 6.2.11.
- Item #9 The checklist references DTP-1.2-001, R12, Attachment 3, Section 3.5.23. Attachment 3.0 only goes to Section 3.4, page 3 of 19.
- Item #10 The checklist references QP-1.1-021, R6, Section 6.6. There is no Section 6.6.
- Item #12 The checklist references QP-1.1-021, Section 6.2.11. There is no Section 6.2.11, the document only goes to 6.2.10.
- Item #12 The checklist references DTP-1.2-001, R12, Attachment 3, Sections 3.5.24 and 3.5.34. As previously mentioned the Attachment only goes to Section 3.4.
- Item #13 The checklist references QP-1.1-021, R12, Attachment 3, Section 3.5.34. There is no such Section.
- Item #26 The checklist references DTP-1.2-001, R12, Sections: 3.5.34 and 3.5.32 in two different places. Again, there are no such Sections.
- Item #28 The checklist references QP-1.1-021, R6, Section 6.6 (ends at Section 6.4), and DTP-1.2-001, R12, Attachment 3, Section 3.5.13. There are no such Sections in these two documents (numerous other references between #28 and #56 but they are referencing the same incorrect documents already cited therefore they are not included).
- Item #55 The checklist references QP-1.1-024, R6, Attachments 1,2,4,5,7,8,9,10. There are no attachments 8, 9, or 10.
- Item #56 The Checklist references QP-1.1-02, R6, Attachment 8. There is no attachment 8.

These incorrect references continue throughout the entire Table B6-1 Checklist. The CBFO Audit checklist must provide proper references. It appears to be most noted for references DTP-1.2-001, R12; QP-1.1-021, R6; and QP-1.1-024, R6.

5. When the checklist items (i.e., #56) are divided into sub categories, the audit report sometimes fails to address all subcategories. For example, checklist item 56 includes sub-element A-N, yet only A-D was addressed. In a related problem, checklist item 56a, which also has sub categories (A-B), the auditor simply neglected to indicate which procedure or which item reviewed addresses which subcategory.
6. Objective evidence cited does not always support the associated checklist element. For example, checklist item #9 references eight PWR, but this element deals with procedures that are in place to ensure that waste streams identified to contain incompatible materials, or material incompatible with the waste containers cannot be shipped. The referenced PWRs do not address this issue. Most address plastic liners, which have not been punctured, pressurized containers and liquids in plastic bottles at levels, which are prohibited. The CBFO Auditors should provide objective evidence that addresses the issue in question.
7. Apparently typographical errors affect the review process. For example, checklist item #37 (Table B6-1), under "location", references Sub Section I, but there is no Sub Section I in Checklist item #37 as the last Sub Section is Sub Section H. It appears that the reference to "I" should be "H".
8. There were several copying errors associated with the checklists which were distributed, wherein the lower portion of the checklists were "cut off" and are not reviewable. This is especially noticeable in the VE checklist.

Errors such as these noted above have been present in previous audit reports, but the number of errors were not as abundant as in the LANL report, and we have been able to "work around" them. However, in the case of the LANL Audit Table B6-1, it is simply too fraught with error to perform an accurate review. Additionally, while the focus of this memo is Table B6-1, the *entire* report should be revised to correct all of these types of errors.