



BILL RICHARDSON
GOVERNOR

State of New Mexico
ENVIRONMENT DEPARTMENT

Hazardous Waste Bureau
2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505-6303
Telephone (505) 428-2500
Fax (505) 428-2567
www.nmenv.state.nm.us



ENTERED



RON CURRY
SECRETARY

DERRITH WATCHMAN-MOORE
DEPUTY SECRETARY

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

February 25, 2003

Dr. Inés Triay, Manager
Carlsbad Field Office
Department of Energy
P.O. Box 3090
Carlsbad, New Mexico 88221-3090

Dr. Steven Warren, President
Washington TRU Solutions LLC
P.O. Box 2078
Carlsbad, New Mexico 88221-5608

**RE: NMED APPROVAL OF THE HANFORD SITE FINAL AUDIT REPORT, AUDIT A-02-23
WASTE ISOLATION PILOT PLANT
EPA I.D. Number NM4890139088**

Dear Dr. Triay and Dr. Warren:

On August 29, 2002, NMED received the Final Audit Report of the Hanford Site (**Hanford**) Audit Number A-02-23 (**Audit Report**), from the Department of Energy's Carlsbad Field Office (**CBFO**). CBFO and Washington TRU Solutions LLC (**the Permittees**) were required to submit this 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 annual recertification audit was to ensure the continued adequacy, implementation, and effectiveness of the Hanford waste characterization processes for retrievably stored debris contact-handled waste relative to the requirements of the WIPP Permit. The Audit Report also evaluated the visual examination (**VE**) technique process applied to newly generated debris and newly generated homogeneous solid contact-handled waste characterized at the Plutonium Finishing Plant. The Audit Report consisted of the following items:

- A narrative report
- Completed copies of relevant Permit Attachment B6 checklists
- Final Hanford standard operating procedures (electronic and hardcopy)
- Corrective action reports and items corrected during the audit

030237



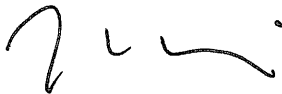
- Objective evidence examined during the audit
 - General information
 - Acceptable knowledge
 - Headspace gas
 - Real time radiography
 - Visual examination

NMED representatives observed the Hanford audit on June 24 – 28, 2002. 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 [WAP]). The Audit Report indicates there was one WAP-related condition adverse to quality in the area of real-time radiography requiring the issuance of a CBFO corrective action report that was corrected prior to submittal of the Audit Report; one deficiency requiring only remedial action that was corrected during the audit; one observation identifying a condition that, if not controlled, could result in conditions adverse to quality; and six recommendations identifying opportunities for improvement.

NMED concludes that this Audit Report demonstrates that Hanford has adequately implemented the applicable characterization requirements of the WAP. Therefore, NMED approves the Permittees' Final Audit Report for Hanford Audit A-02-23 for the recertification of retrievably stored debris contact-handled waste and for the VE technique process for newly generated debris and newly generated homogeneous solid contact-handled waste at the Plutonium Finishing Plant, and amends the previous Audit Report approvals issued by NMED for Audit A-01-16 on February 1, 2002 and Audit A-01-03 on August 8, 2002 to include all waste forms and processes evaluated by this recertification audit. However, homogeneous solids (Summary Category Group S3000) are not approved or eligible for disposal at WIPP until Hanford develops and implements a solid sampling and analysis program as specified in Permit Condition II.C.2.

If you have any questions regarding this matter, please contact me at (505) 428-2512.

Sincerely,



James P. Bearzi
Chief
Hazardous Waste Bureau

JPB:soz

cc: Steve Zappe, NMED HWB
Tracy Hughes, NMED OGC
Tom Fitzsimmons, WA Dept. of Ecology
Laurie King, EPA Region 6
Betsy Forinash, EPA ORIA
Connie Walker, Trinity Engineering
Matthew Silva, EEG
Don Hancock, SRIC
Joni Arends, CCNS
Lindsay Lovejoy, NMAGO
File: Red WIPP '03