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
• 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,

\[\text{\underline{\text{James P. Bearzi}}}\]
\[\text{Chief}\]
\[\text{Hazardous Waste Bureau}\]

JBP:soz
cc: Steve Zappe, NMED HWB
    Tracy Hughes, NMED OGC
    Tom Fitzsimmons, WA Dept. of Ecology
    Laurie King, EPA Region 6
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    Lindsay Lovejoy, NMAGO
    File: Red WIPP '03