

Department of Energy
Carlsbad Field Office
P. O. Box 3090
Carlsbad, New Mexico 88221
05 MAY 2003

 ENTERED



Mr. James P. Bearzi, Chief
Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, NM 87505-6303

Subject: Response to Letter Dated April 28, 2003, Regarding Duplicative Waste Stream Profile Forms for the Savannah River Site

Dear Mr. Bearzi:

The purpose of this letter is to respond to your April 28, 2003 letter regarding duplicative Waste Stream Profile Forms (WSPFs) for the Savannah River Site (SRS).

During the initial certification of the Central Characterization Project (CCP0 at the SRS in October 2001, Mr. Steve Zappe of your office submitted Observer Inquiry Form A-02-09-001 (enclosed) concerning coordination between CCP and SRS characterization process lines. In part, this inquiry asked how adequate communication could be ensured when both process lines were characterizing drums from the same waste streams. The formal response to this inquiry was provided by the Department of Energy (DOE) letter CBFO:QA:TJR:MLC:KBJ:01-1827UFC2300 dated November 28, 2001.

As a result of this inquiry, a section was added to the interface document (Section 4.15 of CCP-PO-004, enclosed) to specifically address controls associated with both process lines working the same waste stream. One of these controls requires that separate WSPFs will be developed by each process line.

Accordingly, the two different WSPFs discussed in your letter do indeed describe the same waste stream, which is waste from the FB-Line, generated between 1986 and 1990. For a short time when the CCP first arrived at the SRS, both process lines were characterizing drums from this single waste stream. WSPF SR-W027-221F-HETA is associated with the CCP characterization process line, while WSPF SR2002.002.00 is associated with the SRS characterization process line.

This is the only instance where both the CCP and SRS process lines characterized waste from the same waste stream. As you are aware from the SRS recertification audit performed in October 2002, the SRS process line has been discontinued. SRS processed approximately 340 drums from this waste stream, and 336 of those have been shipped to the WIPP. Once all of the drums characterized and certified under the SRS process line have been shipped to the WIPP, the SRS WSPF will no longer be used. The CCP process line will characterize the remaining drums from this waste stream.



Mr. James Bearzi

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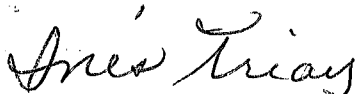
Your letter expresses the concern of overstated waste volumes if a single waste population has been reported under two separate WSPF numbers. CBFO does not determine waste volumes from information on WSPFs. WSPFs provide waste stream specific information per section B3-12b(1) of the permit. Actual disposal volumes are tracked by the WWIS. Because each container has a unique number that is tracked by the WWIS, and because the WWIS does not allow duplicate containers, there is no potential to overstate the waste volume for this waste stream in the WWIS.

Your letter further expresses the concern that the information recorded in the WWIS may reflect an arbitrary distinction that in reality does not exist. The two separate WSPFs ensure that information reported in the WWIS will clearly identify the process line used to perform the characterization. This is a valid and useful distinction.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.

If you have any questions, please contact Mr. Kerry Watson at (505) 234-7357.

Sincerely,



Dr. Inés R. Triay, Manager
Carlsbad Field Office



S. D. Warren, General Manager
Washington TRU Solutions LLC

Enclosure

cc: w/enclosure
K. Watson, CBFO
C. Lundstrum, NMED
C. Noble, NMED
S. Zappe, NMED
B. Forinash, EPA
L. King, EPA
C. Walker, Trinity Engineering

Observer Inquiry Form

Observer: Steve Zappe Date: 10/18/01 Tracking No. A-02-09-001

Discussion of Request: The current linkage between CCP and SRS (i.e., the CCP SPM and SRS STR) appears insufficient to ensure adequate communication between CCP and the existing approved waste characterization program @ SRS. The problem is apparently compounded by both programs characterizing the same waste stream. For example, does the identification of an additional waste code by one program dictate the abolition of that waste code to the same waste stream by the other person? *continued* →

ATL Response: _____

Observer: Accept Response _____ Do Not Accept Response _____ (Provide Reason)

Inquiry Closed: _____
ATL Date

Furthermore, what linkages exist for the exchange and verification/validation of data collected by the separate programs? The current org chart provides for no direct communication between the SRS STR and the SRS SPM.

- [F] Documentation of training completion for SRS VE and HSG personnel.
- [G] Copies of AK source documentation requested by CCP.
- [H] Radiological dose rate and surface contamination results on waste drums as needed to support WWIS data entry.

4.15 Joint TRU Waste Certification Programs

NOTE

This Section applies if both the SRS TRU waste certification program and the CCP TRU waste certification program are processing drums from the same container inventory.

- 4.15.1 Each program will issue its own AK Summary Report to describe the container inventory. Any differences between the two summaries will be resolved by the SRS STR, as assisted by the SPM of each program.
- 4.15.2 As containers are retrieved from storage, they will be assigned to one of the programs by the SRS STR via written correspondence.
- 4.15.3 Each program will characterize and certify the containers assigned to it. This work includes all reconciliation activities.
- 4.15.4 During characterization or reconciliation activities where AK deficiencies are identified with either program, the SRS STR will confirm the other program's SPM is notified. The SPMs will then develop appropriate corrective actions.
- 4.15.5 Each program will prepare a waste stream profile form for the drums it has processed.

4.15.6 On a waste stream lot basis, the CCP SPM will provide the following to the SRS STR:

- DQO Reconciliation Documentation
- Cross reference of containers to batch data reports
- Headspace Gas Summary Data Report
- TIC Listing and evaluation
- RTR and VE summary documentation of no prohibited items
- Waste Container non-conformance summary report

4.15.7 On a waste stream lot bases, the SRS STR will request the SRS SPM to review the waste stream lot documentation and compare it to the SRS waste stream characterization data.

5.0 RECORDS

5.1 Records generated during the performance of this procedure are maintained as QA records in accordance with CCP-QP-008. The records are the following:

5.1.1 QA-Nonpermanent Records

[A] Written Comments from SRS (e.g. memo, e-mail)