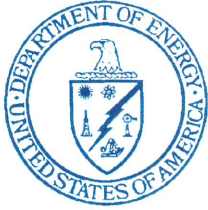
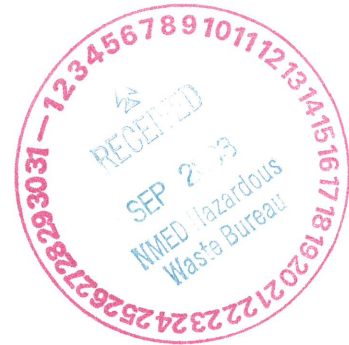


ENTERED



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

SEP 2 2003



Steve Zappe, Project Leader
Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Bldg. 1
Santa Fe, New Mexico 87505-6303

Re: Transmittal of the CBFO Response to NMED Comments on the Rocky Flats
Environmental Technology Site Final Audit Report, Audit A-03-03

Dear Mr. Zappe:

This letter transmits the CBFO response to the letter from Sandra Y. Martin to Drs. Inés Triay and Steven Warren, NMED COMMENTS ON THE ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE FINAL AUDIT REPORT, AUDIT A-03-03, Waste Isolation Pilot Plant EPA I.D. Number NM4890139088, dated August 26, 2003.

A copy of the redline/strikeout annotated B-6 Checklists and requested Rocky Flats Environmental Site procedures are enclosed.

Please contact the CBFO Quality Assurance Manager, Ava L. Holland, at (505) 234-7423 should you have any questions concerning this audit report.

Sincerely,

A handwritten signature in cursive script that reads "Inés Triay".

Inés R. Triay
Manager

Enclosure

cc: w/o enclosure
T. Harms, DOE-HQ
K. Watson, CBFO
A. Holland, CBFO
D. Miehl, CBFO
J. Schneider, RFFO



Steve Zappe

-2-

J. Kieling, NMED
S. Martin, NMED
S. Warren, WTS
L. Greene, WRES
T. Bowden, CTAC
L. Xuan, RFFO
R. Ballenger, RFETS
C. Ferrera, RFETS
G. O'Leary, RFETS

cc: w/enclosure

K. Dunbar, WTS (Operating Record)

C. Walker, Techlaw

QA File

**RESPONSES TO NMED'S COMMENTS ON THE
ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE (RFETS)
RECERTIFICATION AUDIT REPORT A-03-03**

1. On the B6 Checklist, the locations for questions 1, 2, 3, 5, 6, 7, 8, 10, 25, 27, 30, 74, 152, 153, and 161 are given as PRO-484-WIPP-003, R.6. NMED only received R.4 on both the hardcopy and on a compact disk of procedures. This is either a typographical error (R.6 should be R.4) or there have been revisions to the procedure and the Permittees did not submit updated revision.

Response: Revision 4 is the correct revision for PRO-484-WIPP-003 for this report. The applicable questions have been corrected on the resubmitted B6 Checklist.

2. For questions 8, 11, 12, 13, 17, 18, 19, 27, 28, 29, 32, 34, 35, 37, 55, 59, 63, 70, 182, 188, 220, 221, 222a, 222b, 225, 227, 228, 229, 230, and 232 of the B6 Checklist, NMED did not receive documents L-4111-X, L-4146-P, PRO-HDGAS-371, L-4108-G, on either the compact disk of procedures or as a hardcopy. NMED cannot verify the response to the questions.

Response: Hard copies of the procedures have been provided.

3. For questions 8, 11, 18, 19, 20, 21, 22, 24, 27, 28, 29, 32, 33, 34, 35, 36, 37, 48, 55, 59, 126a, 126b and 127 of the B6 Checklist, there is an apparent typographical error for the reference of L-4165-L. This should be L-4165-M. NMED only received L-4165-M.

Response: The perceived typographical error has been corrected for the applicable questions and the explanation has been struck-out of the comments section.

4. For questions 18, 19, 21, 24, 27, 28, 29, 63, and 125 of the B6 Checklist, there is an apparent typographical error for the reference of L-4214-E. This should be L-4214-F. NMED only received L-4214-F.

Response: The perceived typographical error has been corrected for the applicable questions and the explanation has been struck-out of the comments section.

5. For questions 18, 19, 21, 22, 25, 27, 28, 29, 32, 33, 34, 35, 36, 37, 63, 70, 123, 125, and 126a of the B6 Checklist, there is an apparent typographical error for the reference of L-4215-E. This should be L-4215-F. NMED only received L-4215-F.

Response: The perceived typographical error has been corrected for the applicable questions and the explanation has been struck-out of the comments section.

6. For question 24 of the B6 Checklist, NMED did not receive document L-4108-G and cannot verify the response to the question.

Response: *A hard cop of the procedure has been provided.*

7. For question 27a of the B6 Checklist, the reference of PRO-1031-WIPP-1112, S. 1.0 does not address the question. Could it be that the response can be found in another section of the procedure and, therefore, this may be a typographical error?

Response: *Added an exact location for question 27a. Also added a reference to the QAPjP and a new tab (GEN-57) providing Waste/Residue Travelers and Waste Generating Instructions to provide further clarification.*

8. For questions 32, 33, 36, 37, 38, 39, 48, and 70 of the B6 Checklist, NMED did not receive document L-5017-U and cannot verify the response for the questions.

Response: *A hard copy of the procedure has been provided.*

9. For question 33 of the B6 Checklist, the exact location within PRO-940-WIPP-10 to respond to the question is not given. The reviewer attempted to find the exact location, but could not find it.

Response: *An exact location has been provided for question 33 on the resubmitted B6 Checklist.*

10. For question 39 of the B6 Checklist, NMED did not receive a document L4152-K. Could this be a typographical error and the document is actually L-4152-K?

Response: *This typographical error has been corrected on the resubmitted B6 Checklist.*

11. For procedure PRO-940-WIPP-010, R.16, pages 16, 17, 76, 77, and 78 have R.15 on them. Could this be a typographical error?

Response: *This is in fact a typographical error. However, it is on the actual procedure provided by RFETS. The procedure has been revised several times since the audit. The current revision is revision 19. We examined the CBFO copy of revision 19, and all 98 pages have the correct revision number.*

12. For question 44 of the B6 Checklist, PRO-940-WIPP-010, R.10 is cited instead of R.16. Could this be a typographical error?

Response: *This typographical error has been corrected on the resubmitted B6 Checklist.*

13. For question 45 of the B6 Checklist, procedure 1-A65-ADM-15.10, R.6 is probably a typographical error and should be 1-A65-ADM-15.01, R. 6.

Response: *This typographical error is actually in question 44. It has been corrected on the resubmitted B6 Checklist.*

14. For questions 46, 47, 206, 207, 208, 209, 211, 212, 213, and 214 of the B6 Checklist, NMED did not receive either a hardcopy or a copy of procedure L-4006 on the compact disk of procedures. Due to this situation, NMED cannot verify the response to the questions.

Response: *A hard copy of the procedure has been provided.*

15. For question 72 of the B6 Checklist, NMED did not receive hardcopies or copies on the compact disk of procedures of PRO-T31-Traffic-516, R.1, Hazardous Materials Shipment Checklists and PRO-T43-Traffic-528, R.0, TRUPACT-II Operations Flow, and therefore cannot verify the response to the question.

Response: *Hard copies of the procedures have been provided.*

16. For question 78 of the B6 Checklist, the comment that "There are no continuous processes that are generating solids waste" may be incorrect. RFETS has sludges in tanks that have not yet been removed. There may be the process of removing the sludge from the tanks. If there are procedures for such sludge removal from the tanks, then this might be considered to be a process.

Response: *Additional information has been added to the comments section on the resubmitted B6 Checklist to provide clarification.*

17. For question 79 of the B6 Checklist, again the question that the sludge removal from tanks is a process.

Response: See response to comment number 16 above.

18. For questions 134, 135, 137, 140, 141, 142, 143, 144, 151, 156, 158, 159, 160, 161, 162, 163, 164, 165, 167, 168, 169, 180, 181, 200, 233, 234, 235, 236, 237, 238, 239, 240, 241, 242, 243, 244, 245, 246, 247, 248, 249, 250, 251, 252, 253, 254, 255, 256, 257, 258, 259, 260, 261, 262, 263, 265, 266, 267, 268, 269, 270, 271, 275, 276, 278, 280, 281, 282, 283, 284, 285, 291, 295, 297, 298, 299, 300, 301, 302, 303, 304, 305, 306, 307, and 309 of the B6 Checklist, NMED did not receive hardcopies or copies on the compact disk of procedures of procedure 95-QAPjP-0050. NMED cannot verify the response to the question.

Response: *A hard copy of the QAPjP is enclosed. The QAPjP is on our copy of the compact disc and opens just fine. To prevent this problem, only hard copies of documents will be provided in the future.*

19. On the B6 Checklist, the exact location for question 144, subsections D, E, F, G, and H is not given for procedures PRO-484-WIPP-003, 4-I19-NDT-00569, R.6, and for PRO-1471-VE-771.

Response: *An exact location has been provided for question 144, subsections D, E, F, G, and H on the resubmitted B6 Checklist.*

20. For question 171 of the B6 Checklist, in the comments section there is a typographical error for the word streams. It is currently stream.

Response: *A 's' has been added to 'stream' on the resubmitted B6 Checklist.*

21. For questions 172, 173, 174, 175, 176, and 177 of the B6 Checklist, in the comments section. The entire statement leads one to assume that the audit report is not the final audit report. Please clarify.

Response: *The statement in the comments section has been clarified on the resubmitted B6 Checklist.*

22. For questions 191, 197a, 197b, 199, 201, 202, 204, and 205 of the B6 Checklist, NMED did not receive either a hardcopy of a copy on the compact disk of procedures of procedure L-4146-P. NMED cannot verify the responses to the questions with reviewing the procedure.

Response: *See response for comment number 2.*

23. For questions 231, 232 of the B6 Checklist, NMED did not receive document L-5017-U as either a hardcopy or on the compact disk of procedures. Due to this, NMED cannot verify the response to the question.

Response: *See response for comment number 8.*

24. Questions 272, 273, 274, and 312 should be removed from the B6 Checklist as they are no longer relevant to the permit.

Response: *Questions 272, 273, 274, and 312 have been struck-out on the resubmitted B6 Checklist.*