memorandum

Carlsbad Field Office Carlsbad, New Mexic

DATE: 25 NOV 2003

ATTN OF:

CBFO:NTP:KWW:VW:03-3090:UFC:5822

SUBJECT:

Certification of INEEL TWCP

Elizabeth Sellers, Manager, Idaho Operations Office

The Carlsbad Field Office (CBFO) has completed an audit of the Idaho National Engineering and Environmental Laboratory's (INEEL) TRU Waste Characterization Program (TWCP). Audit A-03-15 was conducted at the INEEL near Idaho Falls, Idaho on May 19-22, 2003. The audit team determined that the technical and quality assurance activities evaluated during the audit are in compliance with the "Waste Analysis Plan" (WAP) of the WIPP Hazardous Waste Facility Permit, the Quality Assurance Program Document (QAPD), the CH Transuranic Waste Acceptance Criteria for the Waste Isolation Pilot Plant (WIPP CH-WAC), and other CBFO requirements and standards.

Based on the results of audit A-03-15, the CBFO is granting INEEL TWCP authority for characterization and data generation level review, validation, and verification of data for the following Summary Categories using the listed characterization methods.

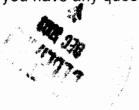
S5000 - Debris Wastes Headspace gas (HSG) analysis S3000 - Homogeneous Solids Headspace gas (HSG) analysis Waste sampling (coring) Waste analysis Visual Examination

The INEEL TWCP is also granted authority to supply generator/storage sites with certified SUMMA® canisters for HSG sample collection.

These authorities are limited to only those processes, systems, and procedures that were audited during A-03-15 and that are listed in the attachments to this memorandum. TRU waste characterization using significantly revised or new processes, systems, or procedures must be evaluated by the CBFO prior to their implementation.

Please note: The CBFO is withdrawing approval of all characterization methods and procedures that were the subject of earlier audits at INEEL.

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



Dr. Inés R. Triay Manager

Attachments

cc: w/attachments	
K. Watson, CBFO	*ED
A. Holland, CBFO	*ED
D. Miehls, CBFO	*ED
M. Navarrete, CBFO	*ED
J. Wells, DOE-ID	*ED
B. Edgerton, DOE-ID	*ED
R. Cullison, DOE-ID	*ED
L. Xuan, DOE-RFFO	*ED
J. Nunz, DOE-LASO	*ED
M. French, DOE-RL	*ED
S. Sailer, INEEL	*ED
C. Crowder, INEEL	*ED
E. Schweinsberg, BN	FL *ED
J. O'Leary, RFETS	*ED
R. Dunn, Hanford	*ED
S. Wander, LANL	*ED
B. Walker, EEG	*ED
F. Marcinowski, EPA	*ED
E. Feltcorn, EPA	*ED
R. Joglekar, EPA	*ED
S. Zappe, NMED	*ED
F. Sharif, WTS	*ED
D. Haar, WTS	*ED
T. Hedahl, WTS	*ED
D. Standiford, WTS	*ED
M. Strum, WTS	*ED
L. Greene, WRES	
E. Bradford, CTAC	*ED
WIPP Operating Rec	ord
CTAC Records Coord	
CBFO M&RC	

^{*}ED denotes Electronic Distribution

IDAHO NATIONAL ENGINEERING AND ENVIRONMENTAL LABORATORY'S TRU WASTE CHARACTERIZATION PROGRAM CERTIFICATION PROGRAM STATUS

The CBFO Office of the National TRU Program Manager and Quality Assurance Manager have evaluated the documentation supporting the compliance of the Idaho National Engineering and Environmental Laboratory's (INEEL) TRU Waste Characterization Program (TWCP). Based on the results of audit A-03-15, it is recommended that the CBFO Manager grant authority to INEEL/TWCP for characterization and data generation level review, validation, and verification of data for the following Summary Categories using the listed characterization methods.

<u>S5000 – Debris Wastes</u> Headspace gas (HSG) analysis S3000 – Homogeneous Solids
Headspace Gas (HSG) analysis
Waste Sampling (coring)
Waste analysis
Visual Examination

In addition, it is recommended that INEEL TWCP be granted authority to supply generator/ storage sites with certified SUMMA® canisters for HSG sample collection.

These recommendations are limited to only those processes and procedures that were audited during A-03-15 and that are listed within this attachment and Attachment 3. **Please note** that it is recommended that CBFO withdraw approval of all characterization methods and procedures that were the subject of earlier audits at INEEL.

STATUS

All program elements remain complete.

- The following INEEL required site documents have been revised, approved, and are current. These program documents demonstrate how the site complies with CBFO requirements.
 - □ SOW CBFO Statement of Work for the INEEL TWCP, TWCP-CBFO-SOW
 - Quality Plan Quality Plan for the INEEL TRU Waste Characterization Program, PLN-1258. Revision 0
 - QAP Analytical Laboratories Department Quality Plan for the TWCP, TWCP-PLN-600, Revision 8.
 - Standard operating procedures (see attachment 3 for complete procedure list)
- INEEL participation in the following performance demonstration programs (PDPs):
 - □ RCRA PDP -- Participation was satisfactory in cycle 10A (Memo CBFO:NTP:MRB:IW:03-2153, dated May 20, 2003)
 - □ HSG PDP -- Participation was satisfactory in cycle 17A (Memo CBFO:NTP:MRB:VW:03-1657 dated April 8, 2003)
- CBFO completed the certification Audit A-03-15 on May 22, 2003. The Final Audit Report was issued to NMED on July 25, 2003.
- NMED approved the Final Audit Report on November 20, 2003 for those processes evaluated during Audit A-03-15.
- All CARs associated with audit A-03-15 have been successfully closed.

INEEL/TWCF itial Certification Letter A-03-15 November 2003

RECOMMENDATION

The recommendation to the CBFO Manager is to grant the INEEL TWCP authority for characterization of retrievably stored, contact-handled, homogenous solids and debris waste.

CONCURRENCE

Ms. Ava L. Holland

Quality Assurance Manager

11 | 25 | Date

Mr. Kerry W. Watson

CBFO Assistant Manager

National TRU Program

INEEL TWCP CERTIFIED EQUIPMENT LIST

WIPP #	Site Equipment #	Site Description	Components	Software		
Headspa	Headspace Gas					
12HE1	GC/MS-E	invironmental Chemistry Lab - Headspace gas olatile organic compounds specified in procedure in procedure ACMM-9930) CMM-9930 GC/MS (Method described in procedure ACMM-9930)		HP Enviroquant Chemstation		
12HE2	GC/MS-F	Environmental Chemistry Lab - Headspace gas volatile organic compounds specified in procedure ACMM-9930	GC/MS (Method described in procedure ACMM-9930)	HP Enviroquant Chemstation		
12HE3	GC/MS-G	Environmental Chemistry Lab - Headspace gas volatile organic compounds specified in procedure ACMM-9930	GC/MS (Method described in procedure ACMM-9930)	HP Enviroquant Chemstation		
12HE4	GC/MS-H	Environmental Chemistry Lab - Headspace gas volatile organic compounds specified in procedure ACMM-9930	GC/MS (Method described in procedure ACMM-9930)	HP Enviroquant Chemstation		
12HE5	GC-1	Environmental Chemistry Lab - Headspace gas volatile organic compounds specified in procedure ACMM-9910	GC-FID (Method described in procedure ACMM-9910)	HP Chemstation		
12HE6	GC-2	Environmental Chemistry Lab - Headspace gas volatile organic compounds specified in procedure ACMM-9910	GC-FID (Method described in procedure ACMM-9910)	HP Chemstation		
12HE7	GC-5	Environmental Chemistry Lab - Headspace gas hydrogen and methane analysis specified in procedure ACMM-9925	GC-TCD (Method described in procedure ACMM-9925)	EZ Chrom 200		
12HE8	GC-6	Environmental Chemistry Lab - Headspace gas hydrogen and methane analysis specified in procedure ACMM-9925	GC-TCD (Method described in procedure ACMM-9925)	EZ Chrom 200		
12HE9	GC-7	Environmental Chemistry Lab - Headspace gas volatile organic compounds specified in procedure ACMM-9910	GC-FID (Method described in procedure ACMM-9910)	Agilent Chemstation		
Solids						
12HA1	VOA-1	INTEC Lab – Total purgable volatile organic compound analysis specified in procedure ACMM-9260	GC/MS (Method described in ACMM-9260)	Finnigan Magnum		
12HA8	VOA-4	INTEC Lab Total purgable volatile organic compounds specified in procedure ACMM-9260	GC/MS (Method described in ACMM-9260)	Agilent Chemstation		
12HA3	GC-1	INTEC Lab – Total non-halogenated volatile organic compounds specified in procedure ACMM-9441	GC-FID (Method described in ACMM-9441)	Agilent Chemstation		
12HA9	GC-5	INTEC Lab – Total non-halogenated volatile organic compounds specified in procedure ACMM-9441	GC-FID (Method described in ACMM-9441)	Agilent Chemstation		
12HA5	SV-2	INTEC Lab – Total semi-volatile organic compounds specified in procedure ACMM-9270	GC/MS (Method described in ACMM-9270)	Varian		
12HA6	SV-3	INTEC Lab – Total semi-volatile organic compounds specified in procedure ACMM-9270	GC/MS (Method described in ACMM-9270)	Varian		
12HA10	SV-6	INTEC Lab – Total semi-volatile organic compounds specified in procedure ACMM-9270	GC/MS (Method described in ACMM-9270)	Agilent Chemstation		
12HM1	ID 322554	INTEC Lab – Total metals digestion specified in procedure ACMM-8909	Microwave digester (Method described in procedure ACMM-8909	NA		

WIPP #	Site Equipment #	Site Description	Components	Software	
12HM2	ID 356094	INTEC Lab – Total metals digestion specified in procedure ACMM-8909	Microwave digester (Method described in procedure ACMM- 8909	NA	
12HM3	ICP-4	INTEC Lab – Total metals analysis specified in procedure ACMM-2901	Total metals analysis (ICP-AES) specified in procedure ACMM-2901	J-YESS	
12HM4	ICP-5	INTEC Lab – Total metals analysis specified in procedure ACMM-2901	Total metals analysis (ICP-AES) specified in procedure ACMM-2901	J-YESS	
12HM7	CVHG-1	INTEC Lab – Total metals (Hg) analysis specified in procedure ACMM-2810	Total metals (Hg) analysis (CVAA) specified in procedure ACMM-2810	AA WinLab Analyst	
12HM8	CVHG-2	INTEC Lab – Total metals (Hg) analysis specified in procedure ACMM-2810	Total metals (Hg) analysis (CVAA) specified in procedure ACMM-2810	AA WinLab Analyst	
Coring	<u> </u>				
12881	W0096-0563- EC-00	Argonne National Laboratory – West – Core sampling as specified in procedure HFEF-OI-6910	Core sampling (Method described in HFEF-OI-6910	NA	

	INEEL CERTIFIED DOCUMENTS & PROCEDURES LIST			
#	PROCEDURE NUMBER	TITLE		
1.	ACLP 4.10	Determination of Method Detection Limits for Gas Analysis		
2.	ACLP 4.25	Sample Receiving, Custody, and Storage		
3.	ACLP 4.40	Summa Canister Cleaning		
4.	ACLP 4.45	Gas Transfer Manifold Systems and Sample Compositing		
5.	ACMM-2810	Determination of Mercury by CVAA for TRU Waste Characterization		
6.	ACMM-2901	Determination of Metals by ICP-AES for TRU Waste Characterization		
7.	ACMM-8909	Microwave Assisted Digestion of Homogeneous Solids and Soil/Gravel		
8.	ACMM-9080	Determination of Polychlorinated Biphenyls (PCBs) by Gas Chromatography		
9.	ACMM-9260	Volatile Organic Compounds by Gas Chromatography Mass Spectrometry		
10.	ACMM-9270	Semivolative Organic Compounds by Gas Chromatography/Mass Spectrometry		
11.	ACMM-9441	Determination of Nonhalogenated Volatile Organics by Gas Chromatography		
12.	ACMM-9500	Sample Preparation for Semivolative Organic Compounds and Polychlorinated Biphenyls		
13.	ACMM-9910	Analysis of Gas Samples for VOCs by GC/FID		
14.	ACMM-9925	Analysis of Gas Samples for Hydrogen and Methane by Micro GC/TCD		
15.	ACMM-9930	Analysis of Gas Samples for VOCs by GC/MS		
16.	HFEF-OI-6862	TWCP Sample Storage and Shipment		
17.	HFEF-OI-6890	TWCP Visual Examination		
18.	HFEF-OI-6910	TWCP Core Drilling Operations		
19.	HFEF-OI-6921	TWCP Solid Sample Preparation		
20.	MCP-2002	Analytical Sample Management		
21.	MCP-2008	Analytical Data Recording, Review and Reporting		
22.	MCP-2009	Analytical Software Control		
23.	MCP-2610	QA Program Administrative Controls for the TWCP		
24.	NT-AP-03	TWCP Data Generation Level Review		
25.	NT-AP-09	TWCP Visual Exam Expert (VEE) Functions and Process		
26.	PLN-600	Analytical Laboratory Department Quality Assurance Plan for the Transuranic Waste		
		Characterization Program		
27.	PLN-1258	Quality Plan for the INEEL TRU Waste Characterization Program		
28.	TWCP-CBFO-SOW	CBFO Statement of Work for the INEEL TRU Waste Characterization Program		