



Department of Energy
 Carlsbad Field Office
 P. O. Box 3090
 Carlsbad, New Mexico 88221
 September 21, 2004



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

Subject: Transmittal of Revised Certification Audit Report for the Idaho National Engineering and Environmental Laboratory, Analytical Laboratory Department, Independent Analytical Laboratory Operations (A-04-17)

Dear Mr. Zappe:

This letter transmits the revised B6 checklists for the Carlsbad Field Office (CBFO) Audit A-04-17 of the Idaho National Engineering and Environmental Laboratory (INEEL). The revised B6 checklists address the issues identified in a letter from the New Mexico Environment Department (NMED) dated August 27, 2004. Also enclosed with this letter are the responses to the comments contained in the attachment to the letter.

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

Sincerely,

R. Paul Detwiler
 Acting Manager

Enclosure

- cc: w/o enclosure
- A. Holland, CBFO *ED
- M. Navarrete, CBFO *ED
- K. Watson, CBFO *ED
- J. Bearzi, NMED *ED
- S. Holmes, NMED *ED
- L. Greene, WRES *ED

- cc: w/enclosure
- C. Walker, TechLaw
- WIPP Operating Record, MS 486-06
- CBFO QA File
- CBFO M&RC

*Ed denotes electronic distribution
 CBFO:QA:DSM:GS:04-1827:UFC 2300.00



**NMED COMMENTS AND THE CBFO RESPONSES TO THE COMMENTS ON
THE IDAHO NATIONAL ENGINEERING AND ENVIRONMENTAL
LABORATORY ANALYTICAL LABORATORIES SAMPLING AND ANALYSIS
PROGRAM FINAL AUDIT REPORT A-04-17**

The following contains the CBFO responses to the NMED comments on the Idaho National Engineering and Environmental Laboratory (INEEL), Analytical Laboratory Department (ALD), Independent Analytical Laboratory Operations Final Audit Report A-04-17

1. Pertaining to question 8 of the B6 Checklist, the reference cited is procedure ACMM-2810 (all). It is incorrectly cited for headspace gas sampling, and should only be cited for solids sampling.

Response: Removed procedure ACMM-2810 (All) from headspace gas sampling section of question 8 of the B6 Checklist and placed it in the solids section

2. Pertaining to question 11 of the B6 Checklist, the reference cited is procedure ACMM-9941, Section 6.14. The section is non-existent.

Response: Question 11 of the B6 Checklist does not reference ACMM-9941 Section 6.14 it does however, reference ACMM-9441 Section 6.14. Section 6.14, is stated in error and should read Section 6.4. Changed B6 Checklist to read ACMM-9441 Section 6.4.

3. Pertaining to question 11 of the B6 Checklist, the reference cited is procedure PLN-600, p.xix. The exact reference should be PLN-600, p. xx.

Response: Changed PLN-600, p. xix to PLN-600, p. xx.

4. Pertaining to questions 12, 13, 26, 27a, 29, 29a, 32, 34, 59, 304, 305, 306, 307, 308, 309, and 313 of the B6 Checklist, procedure INEEL HFEF-OI-6890 was referenced. The problem with the procedure is that the effective date was originally set for 04/08/03, but someone with the initials of "TB" changed the effective date to 04/24/03. Furthermore, Klayne Corburn (WCA Group Leader) signed off on the document on 04/16/03. NMED questions the first use of this procedure due to these apparent discrepancies. There is a possibility that the procedure could have been used past 04/16/03 but before 04/24/03. Please verify the effective date for this procedure.

Response: As described in the Explanation of Change on Page 1 of each procedure, these were issued by ANL-W operations with an effective date of 4/8/03. Because these procedures implement WIPP requirements, they required approval by the TRU Waste Characterization Program at INEEL prior to use by ANL-W to generate WIPP data. These approvals were obtained on 4/16/03. The

incorrect effective dates were mistakenly placed on the cover pages. This was noticed on 5/19/03 and the handwritten corrections were made. The 4/24/03 effective date was assigned to allow for the required training prior to implementing the procedure revisions. No data was generated using these revisions prior to 4/24/03.

5. Pertaining to questions 114, 115, 118, 119, 120, and 122 of the B6 Checklist, procedure INEEL HFEF-OI-6862 was referenced. The problem with the procedure is that the effective date was originally set for 04/20/03, but someone with the initials "TB" changed the effective date to 04/24/03. Furthermore, Klayne Corburn (WCA Group Leader) signed off on the document on 04/16/03. There is a possibility that the procedure could have been used past 04/16/03 but before 04/24/03. Please verify the effective date for this procedure.

Response: As described in the Explanation of Change on Page 1 of each procedure, these were issued by ANL-W operations with an effective date of 4/8/03. Because these procedures implement WIPP requirements, they required approval by the TRU Waste Characterization Program at INEEL prior to use by ANL-W to generate WIPP data. These approvals were obtained on 4/16/03. The incorrect effective dates were mistakenly placed on the cover pages. This was noticed on 5/19/03 and the handwritten corrections were made. The 4/24/03 effective date was assigned to allow for the required training prior to implementing the procedure revisions. No data was generated using these revisions prior to 4/24/03.