



United States Government

Department of Energy

memorandum

Carlsbad Field Office
Carlsbad, New Mexico 88221

DATE: February 25, 2005

REPLY TO
ATTN OF: CBFO:DSM:LC:05-0358:UFC:2300

SUBJECT: Audit A-05-09 of the LANL, TRU Waste Characterization Activities Utilizing the Subcontracted Services of the Washington TRU Solutions, CCP

TO: James Nunz, LASO

Please be advised that an audit team from the Carlsbad Field Office (CBFO) will conduct an audit of the Los Alamos National Laboratories (LANL), TRU waste characterization program utilizing the services of the Central Characterization Project (CCP) at LANL on April 11-15, 2005. The audit will be conducted in accordance with the attached audit plan. Representatives from the New Mexico Environmental Department (NMED) may be present to observe the audit. The US Environmental Protection Agency (EPA) may perform an independent inspection.

Your representatives are requested to coordinate with the audit team to provide the team access to the LANL/CCP facilities, as well as, provide the appropriate space to conduct meetings, provide cognizant personnel to support the audit, and provide the audit team with access to the appropriate documentation and records.

If you have any questions or comments concerning the evaluation, please contact me at (505) 234-7491.

Dennis S. Miehl
Dennis S. Miehl
Quality Assurance Specialist



Attachment

050234



Mr. Nunz

-2-

February 25, 2005

cc: w/attachment

A. Holland, CBFO	*ED
K. Watson, CBFO	ED
J. Bearzi, NMED	ED
S. Zappe, NMED	ED
D. Winters, DNFSB	ED
D. Haar, WTS	ED
R. Raaz, WTS	ED
F. Sharif, WTS	ED
A. Fisher, WTS	ED
S. Peterman, WTS	ED
L. Greene, WTS	ED
P. Martinez, CTAC	ED

CBFO M&RC

CBFO QA File

WIPP Operating Record, MS 486-06

*ED denotes electronic distribution



CARLSBAD FIELD OFFICE AUDIT PLAN

Audit Number: A-05-09

Organization to be Audited: Los Alamos National Laboratory, Washington TRU Solutions, Central Characterization Project (CCP) Services

Organizations to be notified: Los Alamos National Laboratory (LANL)
Washington TRU Solutions (WTS)
New Mexico Environment Department (NMED)
Environmental Protection Agency (EPA)
Defense Nuclear Facilities Safety Board (DNFSB)

Date and Location: April 11-15, 2005
Los Alamos, New Mexico

Audit Team:

Porf Martinez	Audit Team Leader, CBFO Technical Assistance Contractor (CTAC)
Steve Calvert	Auditor, CTAC
Priscilla Martinez	Auditor, CTAC
Pete Rodriguez	Auditor, CTAC
Tommy Putnam	Auditor, CTAC
Annabelle Axinn	Auditor, CTAC
Tammy Bowden	Auditor, CTAC
Jack Walsh	Auditor, CTAC
Jim Schuetz	Auditor, CTAC
Dave Stuenkel	NDA Technical Specialist, CTAC
Karen Gaydosh	RTR&VE Technical Specialist, CTAC
William (BJ) Verret	HSG Technical Specialist, CTAC
Dick Blauvelt	AK Technical Specialist, CTAC
Dee Scott	Transportation Specialist, CTAC
Jim Eide	Transportation Specialist, CTAC
Joe Willis	Transportation Specialist, WTS
Todd Sellmer	Transportation Specialist, WTS

Audit Scope:

The audit team will evaluate the adequacy, implementation, and effectiveness of the CCP technical and quality assurance activities contracted by Los Alamos National Laboratory, (The University of California) for characterization and certification of contact handled homogeneous solid waste (S3000) and debris waste (S5000). The audit scope will also include the characterization and certification of sealed sources as part of the Off-Site Source Recovery Program.

Transportation activities will also be evaluated during the audit including the high wattage waste loading process used by the mobile loading unit.

Note: The solids sampling and analysis processes will be performed by a CBFO certified independent analytical laboratory (INEEL). In addition, the CCP may utilize the independent laboratory to analyze HSG samples. All independent laboratory analysis results will be forwarded to the CCP for project-level data verification and validation.

See attached 'Process and Equipment to be Reviewed During Audit A-05-09 of LANL/CCP for additional details.

Governing Documents/Requirements:

The overall program adequacy and effectiveness of CCP/LANL documents will be based on the current revisions of the following documents:

Quality Assurance Program Document (QAPD), DOE/CBFO-94-1012

Hazardous Waste Facility Permit Waste Isolation Pilot Plant EPA No. NM4890139088-TSDF by the New Mexico Environment Department

TRUPACT-II Safety Analysis Report; TRUPACT-II Authorized Methods for Payload Control (TRAMPAC); and the TRUPACT-II Certification of Compliance, NRC 71-9281

Contact – Handled Transuranic Waste Acceptance Criteria for the Waste Isolation Pilot Plant (CH-WAC), DOE/WIPP-02-3122

Programmatic and technical checklists will be developed from the active revisions of the following documents:

CCP Transuranic Waste Quality Assurance Characterization Project Plan (QAPjP), CCP-PO-001

CCP Transuranic Waste Certification Plan, CCP-PO-002

CCP TRUPACT-II Authorized Methods for Payload Control (TRAMPAC), CCP-PO-003

CCP/LANL Interface Document, CCP-PO-012

Contract between the University of California (LANL) and WTS and associated Statement of Work (SOW)

Related CCP quality assurance and technical implementing procedures

Activities to be Audited:

General

- Results of previous audits
- Changes in programs or operations
- New programs or activities being implemented
- Changes in key personnel

Quality

- Organization and Quality Assurance Program (Program Interfaces and Statement of Work)
- Non-conformances and Corrective Action
- Personnel Qualification and Training
- Documents & Records
- Work Processes
- Procurement
- Inspection and Testing (Control of M&TE for data collection)
- Audits/Assessments
- Sample Control
- Software QA

Technical

- Generator and Project Level Data Validation & Verification
- Acceptable Knowledge (AK)
- Nondestructive Assay (NDA)
- Visual Examination (VE)
- Real Time Radiography (RTR)
- Headspace Gas (HSG) Sampling and Analysis
- Waste Certification (e.g., Waste Stream Profile Form)
- WIPP Waste Information System (WWIS)
- Performance Demonstration Program (PDP)
- Waste Analysis Plan (WAP), Section B6
- Transportation Activities

Schedule of Audit Activities:

A pre-audit conference is scheduled for Monday, April 11, 2005 at 4:00 p.m


Audit team caucus meetings will be held daily at 4:30 p.m. (Tuesday through Thursday).

The audit team will meet daily with appropriate LANL and CCP management at 8:00 a.m. (Wednesday through Friday).

A post-audit conference is scheduled for Friday, April 15, 2005 at 1:00 p.m. All meetings will take place at the designated LANL location at Los Alamos.

Prepared by: 
Porf Martinez, CTAC
Audit Team Leader

Date: 2/24/05

Approved by: 
Ava L. Holland, CBFO
Quality Assurance Manager

Date: 2/24/05

Process and Equipment to be Reviewed During Audit A-05-09 of the LANL/CCP

WIPP #	Process/Equipment Description	Applicable to the Following Waste Streams/Groups of Waste Streams	Currently Approved by NMED	Currently Approved by EPA
PREVIOUSLY APPROVED PROCESSES OR EQUIPMENT				
11HG1	Headspace Gas Agilent GC/MS Procedure CCP-TP-128 Description – Entech 7032-L Autosampler and Agilent analytical instrumentation using GC/MS and GC/TCD methods	Solids (\$3000) Debris (\$5000)	YES	YES
11HC1	Nondestructive Assay HENC Procedure – CCP-TP-063 Description – Canberra Industries High Efficiency Neutron Counter mounted in a transportation container.	Solids (\$3000) Debris (\$5000)	YES	YES
11PT1	Nondestructive Assay PTGS/FRAM System 1 and PTGS/FRAM System 3 Procedure – CCP-TP-126 and CCP-TP-124 Description – Portable Tomographic Gamma Scanner (PTGS) - The data from this system is used along with the relative isotopic data from the FRAM systems to generate quantitative isotopic information for each waste container.	Solids (\$3000) Debris (\$5000)	YES	YES
11RR1	Real Time Radiography (RTR) Procedure – CCP-TP-053 and CCP-TP-028 Description – Real-Time Radiography Mobile Characterization System RTR-[built by VJ Technologies] – 55-gallon drums	Solids (\$3000) Debris (\$5000)	YES	YES
11RR2	Real Time Radiography (RTR) Procedure – CCP-TP-053 and CCP-TP-028 Description – Real-Time Radiography Mobile Characterization System RTR-[built by VJ Technologies] – 55-gallon drums	Solids (\$3000) Debris (\$5000)	YES	YES

Process and Equipment to be Reviewed During Audit A-05-09 of the LANL/CCP

WIPP #	Process/Equipment Description	Applicable to the Following Waste Streams/Groups of Waste Streams	Currently Approved by NMED	Currently Approved by EPA
N/A	Data Verification and Validation	Solids (S3000), Debris (S5000)	YES	YES
N/A	WWIS	Solids (S3000), Debris (S5000)	YES	YES
N/A	Quality Assurance Program	N/A	YES	YES
NEW PROCESSES OR EQUIPMENT				
N/A	Off-Site Source Recovery Program Procedure – CCP-TP-069 and CCP-TP-101 Description – Characterization performed utilizing Visual Examination Technique and Acceptable Knowledge	Debris (S5000)	NO	NO
N/A	Transportation Procedure – CCP-TP-086 Description – High Wattage Waste Process for the Mobile Loading Unit	N/A	N/A	N/A