

United States Government

Department of Energy

Memorandum

Carlsbad Field Office
Carlsbad, New Mexico 88221

DATE: March 8, 2005

REPLY TO
ATTN OF: CBFO:OCT:KWW:GS:05-0740:UFC 5822.00SUBJECT: Discontinuance of Certification Authority for Central Characterization Project Activities at
Argonne National Laboratory (Audit A-04-03 and Surveillance S-05-04)TO: Marvin Gunn, Chicago Operations Office Manager, DOE-CH
Richard D. Raaz, General Manager, WTS

The Carlsbad Field Office (CBFO) conducted Surveillance (S-05-04) of the Central Characterization Project (CCP) transuranic (TRU) waste program deployed at Argonne National Laboratory – East (ANL-E) from December 7-8, 2004 to evaluate continued compliance and project close out activities at the ANL-E. The results of S-05-04 demonstrated that the characterization and certification activities continued to be in compliance with the "Waste Analysis Plan" (WAP) of the *WIPP Hazardous Waste Facility Permit* (HWFP), 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 during the period from Audit A-04-03 until the last shipment. The CBFO also evaluated the documentation for Audit A-04-03 and determined that the program continued to meet the requirements. The New Mexico Environment Department approved the Final Audit Report for A-04-03 on August 27, 2004.

The last shipment of waste from the ANL-E was received at the Waste Isolation Pilot Plant (WIPP) on July 16, 2004. The characterization, certification, and transportation activities performed by the CCP at the ANL-E have been completed; therefore certification authority is no longer required. The attachments to this memorandum contain the complete lists of certified processes, procedures, documents, and systems that were current at the time of audit and shipments.

Any future TRU waste characterization, certification, or transportation activities performed by the CCP at the ANL-E must be audited prior to shipping waste to the WIPP for disposal.


Ines R. Triay
Acting Manager

Attachments



Marvin Gunn/Richard Raaz

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March 8, 2005

cc: w/attachments

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CBFO M&RC

CTAC Document Coordinator

WIPP Operating Record, MS 486-06

**CENTRAL CHARACTERIZATION PROJECT AT
ARGONNE NATIONAL LABORATORY - EAST
CERTIFICATION PROGRAM STATUS**

The CBFO Office of Characterization and Transportation Director and Quality Assurance Manager have evaluated the documentation for Audit A-04-03 & Surveillance S-05-04. The New Mexico Environment department approved the final audit report for A-04-03 on August 27, 2004. The last shipment of waste from the ANL-E was received at the Waste Isolation Pilot Plant on July 16, 2004. The characterization, certification, and transportation activities performed by the CCP at the ANL-E have been completed; therefore certification authority is no longer required.

The attachments to this memorandum contain the complete lists of certified processes, procedures, documents, and systems that were current at the time of audit and shipments. Any future TRU waste characterization, certification, or transportation activities performed by the CCP at the ANL-E must be audited prior to shipping waste to the WIPP for disposal.

S5000 - Debris Wastes

Acceptable knowledge
Data validation and verification
Headspace gas sampling & analysis
(1 automated manifold system)
Nondestructive assay (APNEA & WIT)
Real-time radiography
Transportation
Visual examination (QC check on RTR)
WIPP Waste Information System interface

S3000 - Homogeneous Solids

Acceptable knowledge
Data validation and verification
Headspace gas sampling and analysis (1
automated manifold system)
Nondestructive assay (APNEA & WIT)
Real-time radiography
Solids Sampling and Analysis using the INEEL
TWCP
Transportation
Visual examination (QC check on RTR)
WIPP Waste Information System interface

STATUS


- All program elements were complete.
- The following site documents were current and demonstrated CCP compliance with the CBFO requirements.
 - **QAPjP - CCP-PO-001, Revision 8 - CCP Transuranic Waste Characterization Quality Assurance Project Plan** (Approved March 15, 2004 - CBFO:NTP:RMK:VW:04-1075:UFC-5900)
 - **WCP - CCP-PO-002, Revision 9 - CCP Transuranic Waste Certification Plan** (Approved March 15, 2004 - CBFO:NTP:RMK:VW:04-1074:UFC-5900)
 - **QAP - Section 4.0 of CCP-PO-002**
 - **TRAMPAC - CCP-PO-003, Revision 6, CCP TRUPACT-II Authorized Methods for Payload Control (TRAMPAC)** (Approved June 8, 2004 - CBFO:NTP:KWW:JGW:04-1480:UFC-5822)
 - Certified Systems - see attachment 2 for the complete list of certified systems used by the CCP at the ANL-E through July 16, 2004.
 - Standard operating procedures - see attachment 3 for the complete list of certified CCP procedures used at the ANL-E through July 16, 2004.

- CCP participated in the following performance demonstration programs (PDPs):
- **NDA PDP** - NDA PDP participation was satisfactory in cycle 10B for the APNEA & WIT nondestructive assay systems (CBFO:NTP:MRB:VW:03-3075:UFC:5822 dated September 10, 2003).
 - **HSG PDP** - Participation was satisfactory in cycle 17A for the GC/MS analytical system (CBFO:NTP:MB:VW:03-2104 dated May 8, 2003).
 - **RCRA** – INEEL TWCP participation was satisfactory in Cycle 11A (Memo CBFO:NTP:MRB:JGW:04-1426, dated May 13, 2004).
 - **CBFO** conducted the annual recertification audit (A-04-03) from October 6-9, 2003 to verify the adequacy, implementation, and effectiveness of the CCP characterization activities relevant to contact-handled homogeneous solids (S3000) and retrievably-stored debris waste (S5000). The interim audit report was issued on October 28, 2003. The Final Audit Report was issued to NMED on January 7, 2004. A revised Final Audit Report was issued to NMED on July 23, 2004. The CCP TRU waste program activities were determined to be in compliance with CBFO requirements. Surveillance S-05-04 was conducted December 7-8, 2004 to evaluate the project closeout activities. All closeout activities were determined to be adequate.
 - **EPA** did not participate in Audit A-04-03 or Surveillance S-05-04.
 - **NMED** issued comments to the Audit A-04-03 Final Audit Report on July 8, 2004. The revised Final Audit Report was approved by NMED on August 27, 2004.
 - One CAR (04-002) was issued on October 16, 2003 as a result of Audit A-04-03. The CAR was closed on December 15, 2003.

RECOMMENDATION

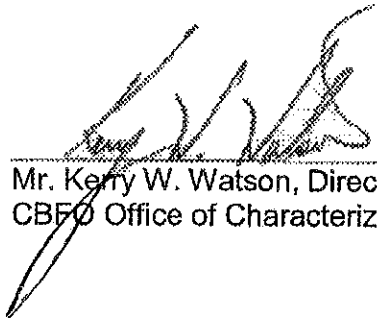
The recommendation to the CBFO Manager is to discontinue certification authority for CCP activities at ANL-E. All CCP project activities at ANL-E have been completed and certification authority is no longer required. It is also recommended that any future characterization, certification, or transportation activities be subject to audit prior to resumption.

CONCURRENCE



Ms. Ava L. Holland, Manager
CBFO Quality Assurance

3-7-05
Date



Mr. Kerry W. Watson, Director
CBFO Office of Characterization and Transportation

3/7/05
Date

**CENTRAL CHARACTERIZATION PROJECT
LIST OF CERTIFIED EQUIPMENT DEPLOYED AT ANL-E
EFFECTIVE THROUGH JULY 16, 2004**

WIPP WWIS #	Site Equipment # or Title	Description	Components	Software
Headspace Gas				
8HG1	CCP-HSG	CCP LANL designed headspace gas sampling and analysis (on-line sampling system) PDP ID = GC:976507, MS:976504, HSGII:0001 Method – CCP-TP-031	Analytical system consisting of: <input type="checkbox"/> GC/MS <input type="checkbox"/> GC/MS interface <input type="checkbox"/> Thermal conductivity detector <input type="checkbox"/> (2) Analysis columns <input type="checkbox"/> Vacuum pumps <input type="checkbox"/> Computer work station Drum sampling/venting system consisting of: <input type="checkbox"/> Automated sampling manifold with 29 sample bottles, valves, and tubing <input type="checkbox"/> Sampling head assembly	<input type="checkbox"/> LabView <input type="checkbox"/> Agilent chemstation MS system <input type="checkbox"/> Barcode software <input type="checkbox"/> Dickson data logger software <input type="checkbox"/> OMEGASOFT nomad data logger software
Non-destructive Assay				
0AP1	Eberline APNEA	Eberline active/passive neutron examination and assay PDP ID = ESD/ESN1 Method – CCP-TP-017, CCP-TP-018	<input type="checkbox"/> (78) He neutron <input type="checkbox"/> 14MeV Zetatron Neutron Generator <input type="checkbox"/> Shielded assay chamber <input type="checkbox"/> Pneumatic drum conveyor system <input type="checkbox"/> Analysis equipment	<input type="checkbox"/> APNEA acquisition software suite <input type="checkbox"/> APNEA analysis software suite <input type="checkbox"/> PLC code
6CP1	WITCO A&PCT	WITCO active and passive computed tomography PDP ID = WIT/AVIC1 Method – CCP-TP-036 (Only provides isotopic data to APNEA for homogeneous solids.)	<input type="checkbox"/> (7) High purity Germanium detectors <input type="checkbox"/> (6) Europium transmission sources <input type="checkbox"/> 3-Axis drum manipulator <input type="checkbox"/> Sharing switcher <input type="checkbox"/> Isolation transformer <input type="checkbox"/> Analysis equipment	<input type="checkbox"/> ACTIS <input type="checkbox"/> ORTEC PC Frame 332 <input type="checkbox"/> ORTEC Maestro 32

WIPP WWIS #	Site Equipment # or Title	Description	Components	Software
Non-destructive Examination				
8RR1	MCS RTR-5	Real-time Radiography Mobile Characterization System's RTR-5 [built by V.J. Technologies] - 55 gallon drums	<ul style="list-style-type: none"> <input type="checkbox"/> Shielded x-ray enclosure with coupled hydraulically operated loading and unloading doors <input type="checkbox"/> Drum conveyor system <input type="checkbox"/> X-ray imaging system including X-ray tube and image intensifier <input type="checkbox"/> Video/Audio recording equipment 	

**CENTRAL CHARACTERIZATION PROJECT
LIST OF CERTIFIED PROCEDURES AT ANL-E
EFFECTIVE THROUGH JULY 16, 2004**

	Procedure Number/Rev	DOCUMENT TITLE
1.	University of Chicago/WTS Contract/ Statement of Work	Argonne National Laboratory-East (ANL-E) Statement of Work for Characterization of ANL-E TRU Waste
2.	CCP-PO-001	CCP Transuranic Waste Quality Assurance Project Plan
	CCP-PO-002	CCP Transuranic Waste Certification Plan
4.	CCP-PO-003	CCP TRUPACT-II Authorized Methods for Payload Control (Certified in A-04-01)
5.	CCP-PO-007	CCP/ANL-E Interface Document
	CCP-PO-008	CCP Quality Assurance Interface with the WTS QA Program
	CCP-QP-001	CCP Graded Approach
	CCP-QP-002	CCP Training and Qualification Plan
	CCP-QP-004	CCP Corrective Action Management
10.	CCP-QP-005	CCP TRU Nonconforming Item Reporting and Control
11.	CCP-QP-006	CCP Corrective Action Reporting and Control
12.	CCP-QP-008	CCP Records Management
13.	CCP-QP-009	CCP Work Control Process
14.	CCP-QP-010	CCP Document Preparation, Approval and Control
15.	CCP-QP-011	CCP Notebooks & Logbooks
16.	CCP-QP-015	CCP Procurement
17.	CCP-QP-016	CCP Control of Measuring, Testing, and Data Collection Equipment
18.	CCP-QP-017	CCP Identification and Control of Items
19.	CCP-QP-018	CCP Management Assessments
20.	CCP-QP-019	CCP Quality Assurance Reporting to Management
21.	CCP-QP-021	CCP Surveillance Program
22.	CCP-QP-022	CCP TRU Software Quality Assurance
23.	CCP-QP-023	CCP Handling, Storage, and Shipping
24.	CCP-QP-026	CCP Inspection Control
25.	CCP-QP-027	CCP Test Control
26.	CCP-QP-028	CCP Records Filing, Inventorying, Scheduling, and Dispositioning
27.	CCP-QP-030	CCP Written Practice for the Qualification of CCP Helium Leak Detection Personnel (Certified in A-04-01)
28.	CCP-QP-031	CCP Using e-QA and the Training Database
29.	CCP-QP-035	CCP System Qualification Status Using the e-QA System
30.	CCP-TP-001	CCP Project Level Data Validation and Verification
31.	CCP-TP-002	CCP Reconciliation of DQOs and Reporting Characterization Data
32.	CCP-TP-003	CCP Sampling Design and Data Analysis for RCRA Characterization
33.	CCP-TP-005	CCP Acceptable Knowledge Documentation
34.	CCP-TP-013	CCP Waste Visual Examination and Repackaging
35.	CCP-TP-015	CCP APNEA Calibration and Calibration Verification with Surrogate Drums
36.	CCP-TP-017	CCP APNEA Data Analysis
37.	CCP-TP-018	CCP APNEA Waste Drum Assay Operations
38.	CCP-TP-028	CCP Radiographic Test and Training Drum Requirements
39.	CCP-TP-030	CCP WWIS Data Entry and TRU Waste Certification
40.	CCP-TP-031	CCP Headspace Gas Sampling Using Automated Manifold
41.	CCP-TP-033	CCP Shipping of CH TRU Waste (Certified in A-04-01)
42.	CCP-TP-034	CCP HSG Data Generation and Batch Data Report

	Procedure Number/Rev	DOCUMENT TITLE
43.	CCP-TP-036	CCP WIT Nondestructive Assay
44.	CCP-TP-037	CCP WIT Nondestructive Assay Annual Calibration
45.	CCP-TP-038	CCP WIT Nondestructive Assay Empirical Data Quality Measurements
46.	CCP-TP-039	CCP Preparing and Handling Waste Drums for Headspace Gas
47.	CCP-TP-041	CCP Preparing and Handling Waste Drums for Visual Examination
48.	CCP-TP-045	CCP RTR #5 Radiography Inspection Operation Procedure
49.	CCP-TP-054	CCP Adjustable Center of Gravity Lift Fixture Preoperational Checks and Shutdown (Certified in A-04-01)
50.	CCP-TP-055	CCP Varian Porta-Test Leak Detector Operations (Certified in A-04-01)
51.	CCP-TP-056	CCP HSG Performance Demonstration Plan
52.	CCP-TP-058	CCP NDA Performance Demonstration Plan
53.	CCP-TP-060	CCP Container Management at Argonne National Laboratory-East
54.	CCP-TP-086	CCP TRUPACT-II Shipping Payload Assembly (Certified in A-04-01)

Cancelled Procedures			
	Procedure Number	Title	Date
1.	CCP-QP-013	CCP QAPD Matrix	05/27/03 - The requirement for maintaining a QAPD matrix was removed from revision 5 of the CBFO QAPD on May 23, 2003.
2.	CCP-QA-020	CCP Independent Assessments	09/11/03 - WTS QA now performs these functions.
3.	CCP-QP-024	CCP Certification of CCP Audit Personnel	09/11/03 - WTS QA now qualifies independent assessment personnel under its QA program.
4.	CCP-TP-014	CCP Prohibited Items Removal and Repackaging	09/06/02