



Department of Energy
Carlsbad Field Office
P. O. Box 3090
Carlsbad, New Mexico 88221
March 17, 2005

ENTERED



Ms. Bonnie Gitlin
Radiation Protection Division
U.S. Environmental Protection Agency
501 3rd Street, NW
Washington, DC 20001

Subject: Audit Plan A-05-12 and Notification of Assigned Auditors for the Idaho Completion Project, Central Characterization Project Audit

Dear Ms. Gitlin:

This letter transmits the audit plan for the Carlsbad Field Office (CBFO) audit to be conducted at the Idaho Closure Project, Central Characterization Project (ICP/CCP) on May 3-6, 2005. The plan also identifies the audit team members and planned audit scope.

It is anticipated that at the time of the audit, the ICP/CCP will have completed all activities needed to obtain Environmental Protection Agency (EPA) approval for the waste characterization programs and processes applicable to waste summary category groups S3000 (homogeneous solids), S4000 (soil/gravel), and S5000 (debris). These waste characterization programs and processes include acceptable knowledge, visual examination, radiography, and non-destructive assay, and the associated data validation activities. The ICP/CCP will also be able to demonstrate transmittal of waste characterization data using the Waste Isolation Pilot Plant (WIPP) Waste Information System (WWIS) database.

At the time of audit A-05-12, the ICP/CCP will not have completed all activities related to headspace gas and solid sampling and analysis for S4000 waste. The CBFO currently plans to perform a follow-up audit, tentatively scheduled for the third quarter in CY 2005, to review completed headspace gas and solid sampling and analysis activities related to S4000 waste to demonstrate compliance with the hazardous waste requirements regulated by the New Mexico Environment Department (NMED).

The CBFO does not believe completion of headspace gas and solid sampling and analysis activities is necessary to obtain EPA approval of the waste characterization programs and processes for S4000 waste conducted by ICP/CCP.

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

Sincerely,


Inés R. Triay
Acting Manager

Enclosure



Ms. Bonnie Gittlin

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March 17, 2005

cc:

A. Holland, CBFO	*ED
M. Navarrete, CBFO	ED
D. Miehis, CBFO	ED
K. Watson, CBFO	ED
R. McCallister, CBFO	ED
S. White, EPA	ED
R. Joglekar, EPA	ED
E. Feltcorn, EPA	ED
B. Shroff, EPA	ED
M. Eagle, EPA	ED
S. Zappe, NMED	ED
R. Raaz, WTS	ED
J. Wilburn, CTAC	ED
L. Price, LANL	ED
CBFO QA File	
CBFO M&RC	
WIPP Operating Record	

*ED denotes electronic distribution

CARLSBAD FIELD OFFICE AUDIT PLAN

Audit Number: A-05-12

Organization to be audited: Idaho Completion Project/Central Characterization Project (ICP/CCP)

Organizations to be notified: Idaho Completion Project
Bechtel Babcock & Wilcox Idaho
Washington TRU Solutions LLC (WTS)
New Mexico Environment Department (NMED)
Environmental Protection Agency (EPA)
Defense Nuclear Facilities Safety Board (DNFSB)

Date and Location: May 3 - 6, 2005
Idaho Falls, Idaho

Audit Team:

Jimmy Wilburn	Audit Team Leader, CTAC
Sandra Tanner	Auditor, CTAC
Jack Walsh	Auditor, CTAC
Steve Calvert	Auditor, CTAC
P. Y. Martinez	Auditor, CTAC
Earl Bradford	Auditor, CTAC
Jeff May	Auditor, CTAC
Jim Schuetz	Auditor, CTAC
Tammy Bowden	Auditor, CTAC
Wayne Ledford	RTR & VE Technical Specialist/ Audit and Assessment Manager, CTAC
Dave Stunkel	NDA Technical Specialist, CTAC
Jim Oliver	RTR/NDA Technical Specialist, CTAC
B. J. Verret	HSG Technical Specialist, CTAC
Dick Blauvelt	AK Technical Specialist, CTAC

Audit Scope:

The audit team will evaluate the adequacy, implementation, and effectiveness of ICP/CCP transuranic (TRU) waste activities as they relate to the Waste Isolation Pilot Plant (WIPP) Hazardous Waste Facility Permit (HWFP) and the Contact Handled Transuranic Waste Acceptance Criteria for the Waste Isolation Pilot Plant (CH-WAC) for S3000 retrievably stored and newly generated, and S5000 retrievably stored and newly generated, and S4000 newly generated. Additional technical and quality assurance elements will also be evaluated. These activities include those performed by ICP/BBWI or for ICP/BBWI by the WTS Central Characterization Project (CCP). The specific items to be audited are listed below

under 'Activities to be audited.'

The ICP/CCP headspace gas and solids sampling and analysis activities for waste form S4000 that are regulated by NMED will be audited on an undetermined date in the third quarter of CY 2005.

Activities to be audited:

The following quality assurance elements will be evaluated:

- Organization
- QA Program
- Personnel Qualification and Training
- Quality Improvement
- Documents & Records
- Procurement
- Grading Program
- Audits/Assessments
- Sample Control
- Software Quality Assurance

The following technical elements will be evaluated:

- Data Validation & Verification
- Acceptable Knowledge
- Nondestructive Assay
- Real Time Radiography
- Visual Examination
- Head Space Gas Sampling and Analysis
- Performance Demonstration Program
- Solid Waste Sampling and Analysis
- Waste Certification (e.g., Waste Stream Profile Form)
- Load Management
- WIPP Waste Information System

See attached 'Process and Equipment to be Reviewed During Audit A-05-12 of ICP/CCP' for additional details.

Governing Documents/Requirements:

The overall program adequacy of ICP/CCP documents will be based on the following documents:

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

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

Contact-Handled Transuranic Waste Acceptance Criteria for the Waste Isolation Pilot Plant (CH-WAC), DOE/WIPP-02-3211

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/BBWI Interface Document, CCP-PO-024

Related ICP/CCP Quality Assurance and technical implementing procedures

Schedule of Audit Activities:


A pre-audit conference will be held Tuesday, May 3, 2005 at 8:00 a.m.

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


Daily management briefings will be held at 8:30 a.m. with the appropriate management Wednesday and Thursday.

A post-audit conference is scheduled for Friday, May 6, 2005 at 11:00 a.m.

All meetings will take place at the designated BBWI location.

Prepared by: 
Jimmy L. Wilburn, CTAC
Audit Team Leader

Date: 3-17-2005

Concurrence: 
Ava L. Holland, CBFO
Quality Assurance Manager

Date: 3/17/05

Processes and Equipment to be Reviewed During Audit A-05-12 of the ICP/CCP

WIPP #	Process/Equipment Description	Applicable to the Following Waste Streams/Groups of Waste Streams	Currently Approved by NMED	Currently Approved by EPA
NEW PROCESSES OR EQUIPMENT				
14HG-A1	Headspace Gas Procedure – CCP-TP-090 Description – HSG-05-Agilent 6890 – HGAS-05	Solids (S3000) Debris (S5000)	NO	Not Applicable
14HENC1	Nondestructive Assay Procedure – CCP-TP107 Description – CCP High Efficiency Neutron Counter	Solids (S3000) Soils (S4000) Debris (S5000)	Not Applicable	NO
14TGS1	Nondestructive Assay Procedure – CCP-TP-097 Description – CCP Tomographic Gamma Spectrometer	Solids (S3000) Soils (S4000) Debris (S5000)	Not Applicable	NO
14SGRS1	Nondestructive Assay Procedure – CCP-TP-115 Description – Stored Waste Examination Pilot Plant (SWEPP) Gamma Ray Spectrometer (SGRS)	Solids (S3000) Soils (S4000) Debris (S5000)	Not Applicable	NO
14WAGS1	Nondestructive Assay Procedure – CCP-TP-019 Description – Waste Assay Gamma Spectrometer (WAGS)	Solids (S3000) Soils (S4000) Debris (S5000)	Not Applicable	NO
14VE1	Visual Examination Procedure – CCP-TP-006 Description – Visual Examination Technique(VET)	Solids (S3000) Soils (S4000) Debris (S5000)	NO	NO

Processes and Equipment to be Reviewed During Audit A-05-12 of the ICP/CCP

WIPP #	Process/Equipment Description	Applicable to the Following Waste Streams/Groups of Waste Streams	Currently Approved by NMED	Currently Approved by EPA
14RR1	Nondestructive Examination Procedure – CCP-TP-102 Description – MCS Real-time Radiography (RTR) Mobile Characterization (RTR-2) System	Solids (\$3000) Debris (\$5000)	NO	NO
N/A	Acceptable Knowledge	Solids (\$3000) Soils (\$4000) Debris (\$5000)	NO	NO
N/A	Solids/ Soil and Gravel Sampling and Custody	Solids (\$3000) Soils (\$4000)	NO	Not Applicable
N/A	SUMMA HSG Sampling and Custody	Solids (\$3000) Debris (\$5000)	NO	Not Applicable
N/A	Data Verification and Validation	Solids (\$3000) Soils (\$4000) Debris (\$5000)	NO	NO
N/A	WWIS	Solids (\$3000) Soils (\$4000) Debris (\$5000)	NO	NO
N/A	Quality Assurance Program	Not Applicable	Not Applicable	NO
PREVIOUSLY APPROVED PROCESSES OR EQUIPMENT				
None – this is an initial certification audit				