



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

ENTERED

MAR 31 2005



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

Subject: Revised Audit Plan for Audit A-05-09 of LANL, TRU Waste Characterization Activities Utilizing the Subcontracted Services of Washington TRU Solutions, Central Characterization Project

Dear Ms. Gitlin:

Enclosed is a revised audit plan for the Carlsbad Field Office (CBFO) audit to be conducted at the Los Alamos National Laboratories (LANL), Los Alamos, New Mexico on April 11-15, 2005. The audit plan was revised to include payload/container certification including load management of TRU alpha activity concentration.

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

Sincerely,

Dr. Inés R. Triay
Acting Manager

Enclosures



Ms. Gitlin

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MAR 31 2005

cc: w/enclosure

A. Holland, CBFO	*ED
D. Miehls, CBFO	ED
K. Watson, CBFO	ED
R. McCallister, CBFO	ED
S. White, EPA	ED
E. Feltcorn, EPA	ED
R. Joglekar, EPA	ED
M. Eagle, EPA	ED
S. Zappe, NMED	ED
S. Holmes, NMED	ED
P. Martinez, CTAC	ED
S. Tanner, CTAC	ED
L. Price, LANL	ED

CBFO QA File

CBFO M&RC

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 and payload/container certification including load management of TRU alpha activity concentration.

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
- Load Management of TRU alpha activity concentration

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:


Port Martinez, CTAC
Audit Team Leader

Date:

3/30/05

Approved by:

 FOR
Ava L. Holland, CBFO
Quality Assurance Manager

Date:

3-30-05

CBFO CORRECTIVE ACTION REPORT

(Continuation Sheet)

1. CAR No. 05-011

2. Activity Report No. A-05-08

3. Page 1 Of 2

Block 18: Verification of Corrective Action Completion

The corrective actions taken and implemented for this CAR were evaluated based on closure documentation package transmitted to CBFO via letter number ED-017-2005, dated 3/21/2005. The corrective actions and objective evidence reviewed and found to be satisfactory are as follows:

Remedial Action:

BNFL-5232-RPT-TRUW-30, Acceptable Knowledge (AK) for Supercompacted Debris Waste will be revised to include the following:

- Section 1.2.4, to show end data for generation dates
- Table 1, to include note for TWBIR numbers in column 1
- Section 1.6.2, provide correct reference as replacement for reference PO12
- Figure 2; add where RTR and NDA processes are used and whether used for plant use of waste certification.

Verification Results:

Verified through review of the closure documentation package that AMWTP initiated DCR 3409 for revision to BNFL-5232-RPT-TRUW-30 on March 18, 2005. Verified BNFL-5232-RPT-TRUW-30, dated March 21, 2005 was revised to address the above items.

Investigative Action and Root Cause Identification:

A review of the reported condition was conducted by Elvin Dumas, the AMWTP QA Manager, and Eric Schweinsberg, the AMWTP Site Project Manager to determine the facts and identify the root cause(s) that led to the issue.

The reported condition has been reviewed and the determination reached that the issue was caused through Human error and lack of attention to detail to ensure the content of the AK Report was completed.

The conclusion from this review is that human performance is less than adequate to fulfill the requirements to ensure the content of the AK Report is complete.

Verification Results:

Verified that AMWTP adequately performed an investigation to determine the extent of the condition by review of the AMWTP CAR 12744 and its attachment, as well as the submitted objective evidence.

Corrective Actions to Preclude Recurrence:

1. The Site Project Manager will brief the Acceptable Knowledge Experts (AKE) on the revision of BNFL-5232-RPT-TRUW-30.
2. The Site Project Manager will review the requirements of the WAP permit attachment B4 for preparation of Acceptable Knowledge Summaries to Waste Stream Profiles with the AKEs.
3. A Lessons Learned will be developed and briefed to SPM and AKE personnel regarding this event.
4. BNFL-5232-RPT-TRUW-30 (latest revision) and the Lessons Learned will be a required read for RTR and VE operators and SPMs and AKEs.

Verification Results:

1. Verified through review of AMWTP Training Rosters that AKE attended briefings on the revision to BNFL-5232-RPT-TRUW-30.

CBFO CORRECTIVE ACTION REPORT

(Continuation Sheet)

PM 3-28-05

1. CAR No. 05-011	2. Activity Report No. A-05-08	3. Page 12 Of 2
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2. Verified through review of AMWTP Training Rosters that AKE attended briefings on the requirements of the WAP permit attachment B4 for preparation of Acceptable Knowledge Summaries to Waste Stream Profiles.
3. Verified a Lessons Learned was developed to address the deficiency on CBFO CAR 05-011.
4. Verified Required Reading was accomplished through review of Training Rosters for BNFL-5232-RPT-TRUW-30 (latest revision) and the Lessons Learned for RTR and VE operators and SPMs and AKEs.

Block 18: Verification of Corrective Action Completion (Continued)

Based on the above supporting documentation and actions, it is recommended that CAR 05-011 be closed.

Block 19a: Verifier: Priscilla Martinez
Priscilla Martinez

Date: 3/23/05

Block 19b: Trend Cause Code: 3.2