



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

APR 04 2005



RECEIVED



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

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 Mr. Zappe:

This letter transmits the 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 change the status of previously approved processes/equipment on the Process and Equipment List.

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

Sincerely,

Dr. Inés R. Triay  
 Acting Manager

Enclosure

- cc: w/enclosure
- A. Holland, CBFO                   \*ED
- D. Miehl, CBFO                    ED
- K. Watson, CBFO                  ED
- R. McCallister, CBFO            ED
- S. Holmes, NMED                 ED
- J. Bearzi, NMED                  ED
- C. Walker, Consultant           ED
- R. Raaz, WTS                     ED
- P. Martinez, 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. 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 (Idaho National Laboratory Transuranic Waste Characterization Program [INL TWCP]). 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.

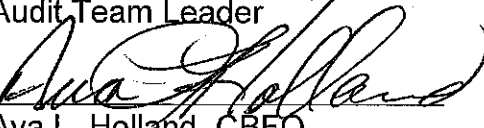
Audit team caucus meetings will be held daily at 4:30 p.m. (Tuesday through Thursday).

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:   
\_\_\_\_\_  
Porf Martinez, CTAC  
Audit Team Leader

Date: 4/4/05

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

Date: 4/4/05

## 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
<b>PREVIOUSLY APPROVED PROCESSES OR EQUIPMENT</b>				
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	N/A
11HC1	Nondestructive Assay HENC Procedure – CCP-TP-063 Description – Canberra Industries High Efficiency Neutron Counter mounted in a transportation container.	Solids (\$3000) Debris (\$5000)	N/A	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.	Debris (\$5000)	N/A	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
N/A	Data Verification and Validation	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	WWIS	Solids (S3000) Debris (S5000)	YES	YES
N/A	Quality Assurance Program	N/A	YES	YES
<b>NEW PROCESSES OR EQUIPMENT</b>				
N/A	Visual Examination and Radiological Characterization of Sealed Sources 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