



## Steve Zappe

**From:** Steve Zappe [steve\_zappe@nmenv.state.nm.us]  
**Sent:** Friday, April 22, 2005 3:55 PM  
**To:** 'Holland, Ava - DOE'; 'Watson, Kerry - DOE'; 'Haar, David'; 'Sharif, Farok'  
**Cc:** 'Carl Chavez'; 'Kate Lynnes'; 'Kevin Krause'; 'Steve Holmes'  
**Subject:** RE: Issuance of CARs 05-027-05-029 from Audit-A-05-09 of the LANL/CCP

Ava -

I am writing to question the determination in CAR 05-027 that it is not RCRA related. This CAR deals with the instance in which an RTR image test pattern was not recorded on a videotape. Apparently there was some discussion between the audit team members and NMED observers regarding whether this is required by the permit, and it seems the audit team concluded that it is not.

I encourage the Permittees to reconsider this conclusion in light of Permit Attachment B3, Section B3-4, which reads in relevant part:

"The QAOs for radiography are detailed in this section. If the QAOs described below are not met, then corrective action shall be taken...

"Data to meet these objectives **must** be obtained from an audio/videotaped (or equivalent media) scan provided by trained radiography operators at the sites. Results **must also** be recorded on a radiography data form...

"...As a measure of precision, the Permittees shall require each Site Project QA Officer to calculate and report the RPD between the estimated waste material parameter weights as determined by radiography and these same parameters as determined by visual examination. Additionally, **the precision of radiography is verified prior to use by tuning precisely enough to demonstrate compliance with QAOs through viewing an image test pattern.**"

Thus, viewing an image test pattern is required to demonstrate compliance with QAOs. By my interpretation of the permit, QAOs for RTR are only met if data are recorded both on audio/videotape and on radiography data forms. Failure to do **both** requires corrective action under the permit.

Please let me know whether you intend to reclassify this as a RCRA related CAR and include it in the final audit report submitted for our review and approval. Thanks!

Steve

---

**From:** Brisbin, Kathy - DOE [mailto:Kathy.Brisbin@wipp.ws]  
**Sent:** Thursday, April 21, 2005 3:01 PM  
**To:** Sharif, Farok  
**Cc:** Holland, Ava - DOE; Watson, Kerry - DOE; 'Michael C. Eagle (eagle.mike@epa.gov)'; 'Ed Feltcorn (feltcorn.ed@epa.gov)'; 'Rajani Joglekar (joglekar.rajani@epa.gov)'; 'James Bearzi (James\_Bearzi@nmenv.state.nm.us)'; Zappe, Steve; 'Dermot Winters (DermotW@DNFSB.gov)'; 'James G. Nunz (jnunz@doeal.gov)'; Haar, David; Peterman, Sue - LANL; Price, Lisa - LANL; Martinez, Porf - CTAC; Pangle, Allison - CTAC  
**Subject:** Issuance of CARs 05-027-05-029 from Audit-A-05-09 of the LANL/CCP

050430

