



Department of Energy
 Carlsbad Field Office
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MAY 13 2005

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Mr. 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 B6 Checklist for the Recertification Audit Report for the AMWTP
 Audit A-04-22

Dear Mr. Zappe:

This letter transmits the revised B6 Checklist for Carlsbad Field Office (CBFO) Audit A-04-22 of the Advanced Mixed Waste Treatment Project (AMWTP). The revised B6 checklists address the issues identified in a letter from the New Mexico Environment Department (NMED) dated April 1, 2005. Also enclosed is a document containing the responses to the NMED comments.

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

Sincerely,

Dr. Inés R. Triay
 Acting Manager

Enclosures

cc: w/comments and responses enclosure

- A. Holland, CBFO *ED
- K. Watson, CBFO ED
- M. Navarrete, CBFO ED
- S. Holmes, NMED ED
- J. Bearzi, NMED ED
- C. Riggs, CTAC ED
- L. Price, LANL ED
- CBFO M&RC

*ED denotes electronic distribution

cc: w/all enclosures

- C. Walker, Trinity Engineering
- CBFO QA File
- WIPP Operating Record, MS 486-06



**NMED COMMENTS AND CBFO RESPONSES FOR THE
ADVANCED MIXED WASTE TREATMENT PROJECT (AMWTP)
FINAL AUDIT REPORT A-04-22**

NMED's review indicated that the Audit Report showed less attention to detail than presented in previous Audit Reports and, unless remedied, this less rigorous approach to preparation could result in significant deficiencies in future Audit Reports. The body of the Audit Report appears to generally address the applicable elements. However, there are some omissions, errors, and inconsistencies including but not limited to the following items:

1. Procedure INST-OI-12, Rev. 18 (Real Time Radiography Operations (Drums)), Section 4.7.3.3.8.24 needs to be modified to clarify when PCBs are considered a prohibited item.

Response: This audit was performed August 16 – 20, 2004. The revisions to upper tier documents that allowed the relaxation of PCB restrictions did not occur until after the audit, therefore these procedures could not reflect this change in requirements. AMWTP procedure INST-OI-12, Rev. 21 shows that Section 4.7.3.3.8.24 has been deleted. Clarification as to when PCBs are considered a prohibited item is addressed in 'Exhibit 6 – List of Prohibited Items'.

2. Procedure INST-OI-34, Rev. 6 (Visual Examination Operating Procedures and Data Reporting), Exhibit 5. List of Prohibited Items, seventh entry needs to be modified to clarify when PCBs are considered a prohibited item.

Response: See response to item 1 above. AMWTP Procedure INST-OI-34, Rev. 10, 'Exhibit 5. List of Prohibited Items' has been updated to provide clarification as to when PCBs are considered a prohibited item.

3. Procedure MP-TRUW-8.1, Rev. 5 (Certification Plan for INEEL Contact-Handled Transuranic Waste), Section 3.5.6 needs to be modified to clarify when PCBs are considered a prohibited item.

Response: See response to item 1 above. AMWTP procedure MP-TRUW-8.1, Rev. 7, Section 3.5.6 has been updated to provide clarification as to when PCBs are considered a prohibited item.

4. Procedure MP-TRUW-8.2, Rev. 3 (Quality Assurance Project Plan (QAPjP)), Section B-1c, sixth bullet as well as WIPP Waste Stream Profile Form (Figure B-1), under the section Homogeneous Solids/Soils/Gravel Sample Analysis, second entry, both need to be modified to clarify when PCBs are considered a prohibited item.

Enclosure

Response: See response to item 1 above. CBFO does not agree, this clarification does not need to be in Section B-1c of the QAPjP. The QAPjP parrots the Waste Analysis Plan (WAP) and then provides a reference as to location where it is covered in greater detail. The Section of the WIPP Waste Stream Profile Form referenced is for 'Sampling and Analysis Information, (i.e. procedure title(s), number(s) and date(s).)

5. Procedure MP-TRUW-8.8, Rev. 10 (Level I Data Validation), Section 4.3.1.6.6.6 needs to be modified to clarify when PCBs are considered a prohibited item.

Response: See response to item 1 above. AMWTP procedure MP-TRUW-8.8, Rev. 11 Section 4.3.1.6.6.6 has been deleted. A note has been added at Section 4.3.1.3.4.7.1 to provide clarification as to when PCBs are considered a prohibited item.

6. Procedure MP-TRUW-8.14, Rev. 2 (Preparation of Waste Stream Profile Forms), Table 5A needs to be modified to clarify when PCBs are considered a prohibited item.

Response: See response to item 1 above. All of the Tables associated with AMWTP procedure MP-TRUW-8.14, Rev. 4 have been cancelled. The Characterization Information Summary (CIS) Report is now addressed in AMWTP Form-1598. CBFO does not agree that the CIS needs to address prohibited items.

7. Question 11, under VE, cites procedure INST-OI-34, Section 4.7.3.9 (NOTE). The citation does not exist.

Response: The correct citation is Section 4.5.8 (NOTE). Question 11 on B6-1 has been corrected.

8. Question 276 cites procedure INST-OI-12, Section 4.7.2. This citation does not answer the B6 Checklist question.

Response: The correct citation is Section 4.7.3. Question 276 on B6-5 has been corrected. Procedure INST-OI-34, S. 4.5 (Caution) has also been cited to provide further clarification.

9. Objective evidence SOL 006, "Solids Sampling refer to CERTIFICATES (ATTACHED) SPATULAS" laboratory report states that sample J009276 Sample Tools was sampled on 11/21/03 at 10:45. The Chain-of-Custody (COC) states that the sample was taken on 11/21/03 at 11:01. This discrepancy should be resolved.

Response: The Date/Time Sampled has been corrected from 10:45 to 11:01 on pages 2 through 5 of the Certificate of Analysis data sheets.

Enclosure

10. From the above-mentioned COC, there are strikeouts without initials or dates. The COC also does not mention exactly which analysis method was used in the check boxes below the analysis. It is not clear if the sampler who printed his/her name is the same one as the signature in the sampler signature line. These should be made clear.

Response: On the chain-of-custody form, the crossed-out Analytes Requested have been re-identified and properly marked out with a single line. The Analytes Requested boxes on the chain-of-custody form have been checked for both samples. A notarized Signature Affidavit is also enclosed.