



Department of Energy
 Carlsbad Field Office
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MAY 27 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 NTS/CCP
 Audit A-05-02

Dear Mr. Zappe:

This letter transmits the revised B6 Checklist for Carlsbad Field Office (CBFO) Audit A-05-02 of the Nevada Test Site/Central Characterization Project (NTS/CCP). 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,

Inés R. Triay
 for

Dr. Inés R. Triay
 Acting Manager

Enclosures

cc: w/comments and responses enclosure

- A. Holland, CBFO *ED
- K. Watson, CBFO ED
- D. Miehl, CBFO ED
- S. Holmes, NMED ED
- J. Bearzi, NMED ED
- C. Riggs, CTAC ED
- L. Price, LANL ED

*ED denotes electronic distribution

cc: w/all enclosures

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



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**NMED COMMENTS AND CBFO RESPONSES FOR THE
NEVADA TEST SITE/CENTRAL CHARACTERIZATION PROJECT (NTS/CCP)
FINAL AUDIT REPORT A-05-02**

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. Question 4 cites procedure CCP-TP-002 Section 4.3. The cited does not seem to answer the question.

Response: The correct citation is CCP-TP-002 Section 4.1.3. This has been corrected on the enclosed B6-1 checklist.

2. Question 12 needs to add procedure CCP-PO-001 Section B-1c to clarify the answers.

Response: Procedure CCP-PO-001 Section B-1c has been added for clarification. This has been corrected on the enclosed B6-1 checklist.

3. Question 28 is answered properly, but are the references cited under RTR and VE supposed to be under item A on the checklist?

Response: 'A-B' added above RTR and VE to provide clarification. This has been corrected on the enclosed B6-1 checklist.

4. Questions 153 and 154 cite procedure CCP-TP-001 Section B4-2b. The cited section is not found in the cited procedure.

Response: The correct citation is CCP-PO-001, Section B4-2b. This has been corrected on the enclosed B6-3 checklist.

5. Question 236 cites CCP-PO-001 Section B-3c. The cited section does not answer the question.

Response: Deleted the B-3c citation. This has been corrected on the enclosed B6-5 checklist.

6. Question 238 needs to add procedure CCP-TP-045 Section 2.2 to clarify the answer.

Response: Added procedure CCP-TP-045 Section 2.2 for clarification. This has been corrected on the enclosed B6-5 checklist.

7. Question 299 cites procedure CCP-PO-001 Section B1-3b(3). The Sections should be B1-3b(4) and B1-3b(5).

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Response: The correct citation is Sections B1-3b(4) and B1-3b(5). This has been corrected on the enclosed B6-6 checklist.

8. Questions 300, 301, 302 and 303 cite procedure CCP-PO-001 Section B1-3b(3). They should cite Section B1-3b(5).

Response: The correct citation is Section B1-3b(5). This has been corrected on the enclosed B6-6 checklist.

9. Question 307 cites Section B1-3b(6) under the "WAP Requirement" column. It should cite Section B1-3b(5), since the cited section does not exist. Also, procedure CCP-PO-001 Section B1-3b(3) is cited. Section B1-3b(5) should be cited instead.

Response: CBFO cannot change information under the "WAP Requirement" column. A Permit modification has been submitted for the change. The correct citation is Section B1-3b(5). This has been corrected on the enclosed B6-6 checklist.

10. Questions 306, 308 and 309 cite Section B1-3b(5) under the "WAP Requirement" column. Section B1-3b(3) should be cited instead.

Response: CBFO cannot change information under the "WAP Requirement" column. A Permit modification has been submitted for the change.

11. CDA #1, Section 6.0, Requirements not met (include document and paragraph), cites CCP-TP-007, S. 4.3.1 [F]. The citation is wrong.

Response: The correct citation is CCP-TP-005, Section 4.8.1. This has been corrected on the CDA number 1 enclosed.

12. CDA #3, Section 6.0, Requirements not met (include document and paragraph), cites CCP-TP-007, S. 4.6. The citation is wrong.

Response: The correct citation is CCP-TP-005, Section 4.6. This has been corrected on the CDA number 3 enclosed.

13. CDA #4, Section 6.0, Requirements not met (include document and paragraph), cites CCP-TP-007, S. 4.5. The citation is wrong.

Response: The correct citation is CCP-TP-005, Section 4.5. This has been corrected on the CDA number 4 enclosed.

14. Many Batch Data Reports (**BDRs**) submitted as objective evidence for RTR were not properly completed. In the NTS/CCP QAPjP, CCP-PO-001, Rev.8, "CCP TRU Waste Characterization Quality Assurance Project Plan", Table B3-1, Waste Material Parameters and Descriptions have two columns (Waste Material Parameter and Description). It also has twelve rows (Iron-based Metals/Alloys, Aluminum-Based Metals/Alloys, Other metals, Other Inorganic Materials, Cellulosics, Rubber, Plastics

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(Waste Materials), Organic Matrix, Inorganic Matrix, Soils/Gravel, Steel (Packing Materials), and Plastics (Packaging Materials)). In the BDRs, there are tables to be filled in during the characterization process in which the description and estimated weights are determined. In several of the BDRs (listed below), there are *no* entries in the "Other Metals" category with an estimated weight.

<u>BDR Number</u>	<u>Problem</u>
<u>NTRTR1002</u>	<u>Drums with electrical wire, equipment, cord and/or motors containing copper.</u> Drums: LL85200339TRU and NT980224
<u>NTRTR1006</u>	<u>Drums with electrical cord, device and equipment containing copper.</u> Drums: NT980077 and LL85400183TRU
<u>NTRTR1019</u>	<u>Drums with electrical cord and wire containing copper.</u> Drums: NT980341 and NT980291
<u>NTRTR1020</u>	<u>Drums with electrical cord, cord with connectors, equipment, device, fittings, wire and wire with connectors containing copper.</u> Drums: NT751083, NT79012, NT980045 and NT79024
<u>NTRTR1026</u>	<u>Drums with electrical cord, connectors, equipment, device, plug and wire containing copper.</u> Drums: NT751058/NT041496, NT751017/NT041507, NT780077/NT041479, NT751136/NT041477, NT751111/NT041412 and NT770029/NT041481
<u>NTRTR1029</u>	<u>Drums with electrical cord, connector, device, equipment and wire containing copper.</u> Drums: NT751016/NT041517, NT751016/NT041516, NT980447 and NT751017/NT041508
<u>NTRTR1040</u>	<u>Drums with electrical device, cord and wire containing copper.</u> Drums: NT282162/NT041578, NT283089/NT041584 and NT2830581/NT041589
<u>NTRTR1051</u>	<u>Drums with electrical cord and wire containing copper.</u> Drums: NT284145/NT041701 and LL85400102TRU/NT041662

NMED notes that this comment is similar to a comment provided on SRS/CCP Audit A-05-01. In response to that comment, the Permittees quoted a portion of Permit Attachment B1, Section B1-3b, which states, "The radiography system involves qualitative and semiquantitative evaluations of visual displays." The Permittees further stated, "When examining heterogeneous debris waste streams, even trained radiography

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operators will differ in their weight estimates of minor waste material parameter components. Differences in weight estimates like the examples noted above have no impact on the ability of the radiography operators to verify the physical form of the waste and the absence of prohibited items.”

However, Permit Attachment B1, Section B1-3b, also states, “A radiography data form is also used to document the Waste Matrix Code and estimated waste material parameter weights of the waste. The estimated waste material parameter and weights should be determined by compiling an inventory of waste items, residual materials, and packaging materials. The items on this inventory should be sorted by waste material parameter and combined with a standard weight look-up table to provide an estimate of waste material parameter weights.” NMED does not find any exemption from the requirement to report estimated material parameter weights in this section of the permit, particularly if the data forms in the BDRs are used to document the inventory of waste items and waste material parameters. Table B3-1 in Permit Attachment B3, “Waste Material Parameters and Descriptions”, provides the description for “Other Metals” as “All other metals found in the waste materials.” The Permittees must provide a more compelling justification as to why these apparently incomplete BDRs (with respect to reporting estimates of waste material parameter weights) can be considered compliant with permit requirements.

Response: As stated previously, “ the Permit states in B1-3b, ‘The radiography system involves qualitative and semiquantitative evaluations of visual displays. Operator training and experience are the most important considerations for assuring quality controls in regard to the operation of the radiography system and for interpretation and disposition of radiography results.’ When examining heterogeneous debris waste streams, even trained radiography operators will differ in their weight estimates of minor waste material parameter components. Differences in weight estimates like the examples noted above have no impact on the ability of the radiography operators to verify the physical form of the waste and the absence of prohibited items.”

However, CBFO notes NMED’s concern and will direct the CBFO NDE auditors and technical specialists to review NDE data sheets during future audits of the TRU waste generator/storage sites with this concern in mind.