



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

AUG 29 2008

David C. Moody, Ph.D.
Manager, Carlsbad Field Office
U.S. Department of Energy
P.O. Box 3090
Carlsbad, NM 88221



Dear Dr. Moody:

This letter transmits the scope of the Environmental Protection Agency's (EPA's) continued compliance inspection (EPA-INL-CCP Inspection No. 09.08-24) of the Central Characterization Project (CCP) at Idaho National Laboratory (INL) near Idaho Falls, Idaho. The inspection is scheduled for September 16-18, 2008. EPA will evaluate the use of nondestructive assay (NDA), nondestructive examination (NDE), and container management.

EPA will evaluate the acceptable knowledge (AK) element of the system of controls at a later date. However, Ms. Connie Walker, EPA's AK inspector, will interview INL-CCP staff identifying excavated TRU waste as debris, soil and solids/sludge for packaging and characterization the week of September 8, 2008. She will seek the assistance of CBFO staff at the Advanced Mixed Waste Treatment Plant audit and Chuck Stepzinski, INL-CCP's point of contact, to arrange for a meeting time with the INL-CCP staff mentioned above.

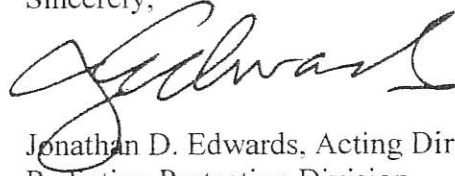
The enclosure identifies the transuranic (TRU) waste characterization system of controls that will be evaluated during the inspection and the inspection schedule. The enclosure also identifies the following key milestones:

- A September 2, 2008, conference call between EPA, INL-CCP, and CBFO to discuss the inspection logistics and scope.
- Receipt of documents (preferably electronically or alternatively, posted on CCP's FTP site) mentioned in the enclosed INL-CCP inspection scope under a section titled "Documents for EPA Review."



Please contact Rajani Joglekar, INL-CCP Baseline Inspection Team Lead, at 202-343-9462, if you have any questions.

Sincerely,



Jonathan D. Edwards, Acting Director
Radiation Protection Division



Enclosure

cc (Electronic Distribution):

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Scope of EPA's Continued Compliance Inspection @ INL-CCP
EPA-INL-CCP Inspection No. 09.08-8

DOE Site: Idaho National Laboratory-Central Characterization Project (INL-CCP)

Organizations Notified: Department of Energy - Carlsbad Field Office
Department of Energy - Idaho National Laboratory
New Mexico Environment Department

Inspection Dates: September 16-18, 2008

Inspection Schedule: Tuesday 8-9 am kick-off meeting*
Tuesday 9 am - 4 pm
Wednesday 8 am - 4 pm
Thursday 8 am - 11 am
Thursday 2-3 pm close-out meeting*

* - with INL-CCP Management and technical leads

EPA Inspection Team: Rajani Joglekar (Team Lead) and Ed Feltcorn (EPA)
Patrick Kelly, Dorothy Gill, and Connie Walker (EPA Contractor Staff)

Inspection Scope:

EPA will conduct a 40 CFR 194.22 continued compliance inspection to evaluate the adequacy, implementation, and effectiveness of technical processes implemented by INL-CCP for characterizing the following types of contact-handled (CH) transuranic (TRU) wastes that have been approved by EPA in 2005:

- S5000 newly-generated and retrievably-stored debris
- S4000 newly-generated soil
- S3000 newly-generated and retrievably-stored solids

Characterization Systems To Be Inspected:

From September 16-18, 2008, the following waste characterization components of the system of controls implemented by INL-CCP will be evaluated under the inspection authority described in 40 CFR 194.22:

- Nondestructive assay (NDA) focusing on two systems - SuperHENC and WAGS
- Nondestructive examination (NDE) - visual examination (VE) and real-time radiography (RTR) covering all NDE processes currently in use to confirm physical attributes for wastes packaged from the Accelerated Retrieval Project I (ARPI) and ARP II
- Container Management

The EPA inspection includes evaluation of personnel qualifications/training (by review of records and conducting interviews), operating procedures, and assay equipment to determine regulatory compliance and assess the adequacy of the waste characterization system of controls.

In addition, EPA contractor staff responsible for AK evaluation will interview INL CCP staff identifying excavated TRU waste as debris, soil and solids/sludge for packaging and characterization. Ms. Connie Walker will conduct this interview during the week of September 8, 2008. She will seek assistance of the CBFO staff at the Advanced Mixed Waste Treatment Plant audit to make arrangements for a meeting with the INL CCP staff mentioned above.

EPA Replicate Assay:

Two weeks prior to the inspection (by September 2, 2008), INL-CCP will provide EPA with a list of 20 previously-characterized TRU waste drums of heterogeneous debris, organic or absorbed inorganic liquids that were assayed on the SuperHENC and/or WAGS. EPA may select up to three (3) primary drums and one (1) alternate drum from each waste category for both the SuperHENC and WAGS for replicate analysis. INL-CCP will assay the selected drums using the EPA replicate assay protocol and will provide the assay results to EPA electronically within two weeks following the inspection.

Documents For EPA Review:

By September 8, 2008, INL-CCP must provide, preferably electronically or alternatively, posted on CCP's FTP site, NDA, NDE, and Container Management procedures implemented by the site. From this list, EPA will identify procedures that DOE must provide electronically, a week prior to EPA's inspection. EPA will use these procedures to develop inspection checklists necessary to evaluate the adequacy of the program and compliance with the waste characterization requirements at 40 CFR 194.24.

Retrieval procedures for waste(s) that describe how waste retrieved from the ARP I and ARP II areas are identified and cleared prior to VE are needed by September 4, 2008.

During the inspection, EPA may require additional documents. On the first day of the inspection, INL-CCP will make the EPA-requested documents available to the inspectors.

Inspection Logistics:

- EPA has arranged a conference call for **Tuesday, September 2, 2008, at 11:30 am (EDT). The call-in number is 1-866-299-3188, when prompted enter 2023439462#.** During this call:
 - EPA Inspection Team Leader (Rajani Joglekar) will go over the inspection details and will address any inspection related questions that INL-CCP management and technical leads may have.
 - INL-CCP (management and technical leads) will inform EPA of revisions to technical procedures, if any, and other operational details that EPA should be aware of prior to the inspection.

- CBFO will inform EPA of any programmatic issues that may have bearing on the EPA inspection.
- A pre-inspection conference will be held September 16, 2008 at 8:00 am at the location designated by INL-CCP for this purpose.
- The EPA Inspection Team Leader will meet with the appropriate INL-CCP management on September 17 and 18, 2008, at 8:00 am, to provide a status briefing at the location designated by INL-CCP for this purpose.
- A post-inspection EPA briefing for the appropriate INL-CCP management will be held September 18, 2008, at 2 pm at the location designated by INL-CCP for this purpose.
- EPA inspectors will need a meeting place (large enough to hold 10 people), equipped with a desktop computer with internet access, and a phone with long distance access from September 16-18, 2008, 8 am – 4 pm.
- CBFO QA is welcome to provide observers for the EPA inspection.