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Department of Energy
Carlsbad Field Office
P. O. Box 3090
Carlsbad, New Mexico 88221
September 17, 2008



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

SUBJECT: Transmittal of the Certification Audit Report for the Argonne National Laboratory/Central Characterization Project, Audit A-08-24

Dear Mr. Zappe:

This letter transmits the Argonne National Laboratory/Central Characterization Project (ANL/CCP) Audit Report for the processes performed to characterize and certify waste as required by Section II.C.2.c of the WIPP Hazardous Waste Facility Permit. The report contains the results of the recertification audit performed for remote-handled (RH) Summary Category Group (SCG) S5000 debris waste. The audit was conducted August 5 – 7, 2008.

An electronic version of audit documentation (final audit report, B-6 checklists, and the audited plans and procedures) is included as a courtesy for use by NMED, but is not to be regarded as the formal submittal.

I certify under penalty of law that this document and all enclosures were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.

Please contact the CBFO Quality Assurance Manager, Ava Holland, at (575) 234-7423 should you have any questions concerning this audit report.

Sincerely,

David C. Moody
Manager

Enclosure



Mr. Steve Zappe

-2-

September 17, 2008

cc: w/report narrative

A. Holland, CBFO	*ED
D. Miehl, CBFO	ED
M. Navarrete, CBFO	ED
D. Gadbury, CBFO	ED
N. Castaneda, CBFO	ED
C. Fesmire, CBFO	ED
D. Ploetz, WTS/CCP	ED
V. Cannon, WTS/CCP	ED
A. J. Fisher, WTS/CCP	ED
M. Walker, WTS/CCP	ED
L. Porter, WTS/CCP	ED
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D. Dietzel, DOE-CH	ED
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J. Bearzi, NMED	ED
S. Holmes, NMED	ED
J. Kieling, NMED	ED
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C. Timm, Pecos Management Services	ED
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G. Lyshik, LANL-CO	ED
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C. Riggs, CTAC	ED
WWIS Database Administrators	ED
R. Chavez, WRES	ED
W. Most, WRES	ED
D. Streng, WRES	ED
L. Pastorello, WRES	ED
A. Pangle, CTAC	ED
R. Garcia, CTAC	ED

cc: w/enclosures

WIPP Operating Record, MS: 452-09

CTAC QA File

CBFO M&RC

2 Copies to S. Zappe

*ED denotes electronic distribution

U.S. DEPARTMENT OF ENERGY
CARLSBAD FIELD OFFICE

FINAL
AUDIT REPORT
OF THE
ARGONNE NATIONAL LABORATORY (ANL)
UTILIZING THE
CENTRAL CHARACTERIZATION PROJECT (CCP) FOR REMOTE-
HANDLED (RH) WASTE CHARACTERIZATION
CARLSBAD, NM, AND ARGONNE, IL
AUDIT NUMBER A-08-24

August 5 – 7, 2008



Prepared by: *Charles L. Riggs* Date: 9/16/08
Charles L. Riggs, CTAC
Audit Team Leader

Approved by: *Ava L. Holland FOR* Date: 9-16-08
Ava L. Holland, CBFO
Quality Assurance Manager

1.0 EXECUTIVE SUMMARY

Carlsbad Field Office (CBFO) certification Audit A-08-24 was conducted to evaluate the continued adequacy, implementation, and effectiveness of Argonne National Laboratory (ANL) transuranic (TRU) waste characterization activities performed for ANL by the Washington TRU Solutions (WTS) Central Characterization Project (CCP). The activities reviewed were for characterization and certification of remote-handled (RH) Summary Category Group (SCG) S5000 debris waste. The activities are performed consistent with the requirements described in the Waste Isolation Pilot Plant (WIPP) Hazardous Waste Facility Permit (HWFP), the CBFO Quality Assurance Program Document (QAPD), and the Transuranic (TRU) Waste Acceptance Criteria for the Waste Isolation Pilot Plant (WAC).

Audit A-08-24 was conducted in Carlsbad, NM, and Argonne, IL, August 5 - 7, 2008. The audit team concluded that overall, the ANL/CCP technical procedures are adequate relative to the flow-down of requirements from the HWFP, the CBFO QAPD, and the WAC. The audit team concluded that the ANL/CCP technical areas evaluated are being satisfactorily implemented and are effective.

The audit team also concluded that the ANL/CCP RH Quality Assurance (QA) program activities that demonstrate compliance with the Table B6-1 checklist QA-related questions are being implemented and are effective.

No Waste Analysis Plan (WAP) deficiencies requiring the issuance of a CBFO corrective action report (CAR) were identified. One deficiency isolated in nature and requiring only remedial corrective actions was identified and corrected during the audit (CDA). One Recommendation was presented to ANL/CCP management. The CDA and Recommendation are described in sections 6.0 and 7.0.

2.0 SCOPE

The audit team evaluated the adequacy, implementation, and effectiveness of the ANL/CCP RH TRU waste characterization activities. The following elements were evaluated:

General

- Results of previous audits
- Changes in programs or operations
- New programs or activities being implemented
- Changes in key personnel

Technical

Acceptable Knowledge (AK)
Visual Examination (VE)
Headspace Gas (HSG)
WIPP Waste Information System (WWIS)
Project Level Verification and Validation (V&V)

Quality Assurance

The following QA elements were evaluated only to the extent needed to support the technical elements listed above:

Control of Nonconforming Items
Personnel Qualification and Training
Records
Sample Control

The evaluation of ANL/CCP TRU waste activities and documents was based on current revisions of the following documents:

- *CBFO Quality Assurance Program Document, DOE/CBFO-94-1012*
- *Waste Isolation Pilot Plant Hazardous Waste Facility Permit, NM4890139088-TSDF, New Mexico Environment Department*
- *Transuranic Waste Acceptance Criteria for the Waste Isolation Pilot Plant, DOE/WIPP-02-3211*
- Related technical and QA implementing procedures

3.0 AUDIT TEAM, MANAGEMENT REPRESENTATIVES, AND OBSERVERS

Charlie Riggs	Audit Team Leader, CBFO Technical Assistance Contractor (CTAC)
Dennis Miehls	CBFO QA Management Representative
Mark von Weber	Auditor, CTAC
Porf Martinez	Auditor, CTAC
Tammy Bowden	Auditor, CTAC
Berry Pace	Auditor, CTAC
Cindi Castillo	Auditor, CTAC
Dick Blauvelt	Technical Specialist, CTAC
Charleen Roberts	Technical Specialist, CTAC
Karen Gaydosh	Technical Specialist, CTAC
Paul Gomez	Technical Specialist, CTAC
Kirk Kirkes	Technical Specialist, CTAC

OBSERVERS

JR Stroble CBFO
Steve Holmes New Mexico Environment Department (NMED)

4.0 AUDIT PARTICIPANTS

The ANL/CCP individuals contacted during the audit process are identified in attachment 1. A pre-audit meeting was held by teleconference in Carlsbad, NM, and Argonne, IL, on August 5, 2008. Discussions were conducted with ANL/CCP management and staff to keep them apprised of the audit activities. The audit concluded with a post-audit meeting held by teleconference in Carlsbad, NM, and Argonne, IL, on August 7, 2008.

5.0 SUMMARY OF AUDIT RESULTS

5.1 Program Adequacy and Implementation

The audit team concluded that overall, the applicable ANL/CCP TRU waste characterization activities for RH SCG S5000 debris waste, as described in the implementing procedures, are adequate, satisfactorily implemented, and effective. The Permit Attachment B6 checklist questions that were applicable to the audit scope were answered. Those B6 checklist questions that were not applicable to the audit scope are marked "NA" on the B6 checklists. Audit activities, including objective evidence reviewed, are described below.

5.2 Technical Activities

5.2.1 Table B6-1 WAP Checklist

This audit was performed to assess the ability of ANL/CCP to manage and perform TRU waste characterization and certification activities for RH SCG S5000 debris waste. The B6-1 WAP checklist addresses general program requirements from an overall management perspective. The general requirements checklist addresses both technical requirements and QA programmatic requirements that, when collectively implemented, ensure effective overall management of TRU waste characterization and certification activities. Requirements are integrated into controlled documents that will ensure the waste characterization strategy as defined in the WAP is accomplished and documented in accordance with controlled processes and procedures.

The audit team evaluated both the QA program aspects of the B6-1 checklist and the technical activities defined in the remaining B6 checklists.

The CBFO audit team evaluated the ANL/CCP QA program activities that demonstrate compliance with the Table B6-1 checklist QA-related questions. The following B6-1 checklist items related to the implementation of the QA program were evaluated by the team.

- Personnel Qualification and Training – The audit team reviewed implementing procedures relative to the training and qualification of personnel and determined that the procedures were adequate. Personnel were interviewed and documentation for individuals performing AK, VE, and HSG activities were reviewed and determined to be adequate, with requirements satisfactorily implemented and effective. No WAP-related concerns were identified.
- QA Records – The audit team reviewed the appropriate procedures, interviewed personnel, and reviewed documentation relative to the identification, control, and disposition of WAP-related QA records. The audit team identified no issues or concerns related to records management. The WAP-related records activities were determined to be adequate, satisfactorily implemented, and effective.
- Control of Nonconforming Items and Corrective Action – The audit team interviewed personnel and reviewed documentation, including procedures, relative to the control of nonconforming items and associated corrective actions. The audit team identified no issues or concerns related to nonconforming items and corrective action. These activities were determined to be adequate, satisfactorily implemented, and effective.
- WWIS – The audit team reviewed the implementing procedures and interviewed personnel associated with the input of data into WWIS. The audit team also witnessed a portion of the WWIS data entry for the initial shipment from ANL. The team identified no issues or concerns relative to WWIS activities and determined the activity to be adequate, satisfactorily implemented, and effective.

The B6-1 WAP checklist addresses program requirements from an overall management perspective. It documents the verification that the waste characterization strategy as defined in the WAP is implemented by using controlled procedures. This audit was performed to assess the ability of ANL/CCP to characterize and certify a RH SCG S5000 debris waste stream. Objective evidence to evaluate the implementation of the characterization strategy was selected by review of all available batch data reports (BDRs), sampling training documentation for ANL/CCP personnel, observation of demonstrations of actual waste characterization activities (such as WWIS data entry), and requesting specific documentation from the ANL/CCP Records Center. Each characterization process involves:

- Collection of raw data
- Collection of quality assurance/quality control (QA/QC) samples or information
- Reduction of the data to a usable format, including a standard report
- Review of the report by the data generation facility and the site project office
- A comparison of the data against program data quality objectives
- Reporting the final waste characterization information to WIPP

The flow of data from the point of generation to inclusion in the Waste Stream Profile Form (WSPF) for each characterization technique was reviewed to ensure that all applicable requirements were captured in the site operating procedures. Because the material in this section is also addressed in more detail in the following sections, the specific procedures audited and the objective evidence reviewed are provided in the appropriate sections.

Compliance with the characterization requirements of the WAP was demonstrated through documentation and by demonstrating the characterization activities. The project-level data V&V process was evaluated by reviewing the following BDRs:

RHANLVE080001
RHANLVE080002
RHANLVE080004
RHANLVE080005

Copies of these BDRs are included as objective evidence in attachment 3.

5.2.2 Table B6-2 Solids and Soils/Gravel Sampling Checklist

This audit was performed to assess ANL/CCP's ability to characterize and certify RH SCG S5000 debris waste. Neither SCG S3000 homogeneous solids waste nor SCG S4000 soils/gravel are within the scope of this audit.

5.2.3 Table B6-3 Acceptable Knowledge Checklist

The audit team assessed the ability of ANL/CCP to characterize and certify an RH TRU mixed waste debris stream generated and stored at the ANL. The audit was performed in accordance with the WAP, and the AK audit staff specifically addressed the WAP requirements listed on the B6-3 checklist, along with portions of the B6-1 checklist. Objective evidence was compiled and reviewed to demonstrate compliance with each of the requirements. The waste stream evaluated, designated as AERHDM, consists of the forty-four 30-gallon drums that were examined in the previous audit for which CCP reviewed the VE tapes of packaging performed by ANL staff. Two of these drums were rejected by CCP during the VE tape review for potentially containing prohibited items.

In addition, the audit team reviewed the AK record for a small population of newly packaged drums for which CCP generated VE BDRs based on their observation of actual packaging operations by ANL staff. At the time of this audit, VE BDRs for eight newly packaged drums had undergone complete project-level review.

In addition to the AK Summary Report, WSPF, and attachments for this waste stream, the team reviewed numerous relevant AK source documents to establish support for the conclusions noted in the AK Summary. The team also examined AK attachments addressing a crosswalk between the AK source documents and the WAP requirements, the reference list of AK source documents, the hazardous waste constituents list, the waste form, waste material parameters, prohibited items and packaging AK attachment

6, and a container inventory listing. The audit team reviewed several discrepancy reports resolving discrepancies in the AK record.

The required traceability exercise was performed for four drums that had been completely through the characterization and certification process (two drums from the retrievably stored population and two drums of newly packaged waste). Four VE BDRs prepared by CCP personnel were reviewed and compiled as objective evidence. The team reexamined the HSG BDR compiled from the sampling and analysis of a random selection of 10 drums from the Lot 1 waste stream population of 44 drums. Furthermore, the random selection memo for Lot 2, which is expected to have a minimum population of 50 drums and a maximum population of 100 drums, was extensively discussed to assure compliance with the WAP. No drums from Lot 2 have been sampled at this time.

The audit team also examined and added to the objective evidence a nonconformance report (NCR) written by CCP on prohibited items in two drums, as noted above. The estimated waste material parameter weights for this stream and supporting documentation were reviewed. An examination of the AK Accuracy Report, AK Expert (AKE) and Site Project Manager (SPM) training records, and the reconciliation of the characterization data with the AK record for shipping Lot 1, along with the AK Characterization Checklist, completed the AK WAP review process.

The audit team concluded that the ANL/CCP program applied to the RH debris stream adequately demonstrated procedural compliance with requirements, and was satisfactory and effective in implementing those requirements.

One Recommendation was provided to ANL/CCP management for consideration (see section 7.2).

Overall, the audit team concluded that AK activities were adequate, satisfactorily implemented, and effective.

5.2.4 Table B6-4 Headspace Gas Checklist

The audit team assessed the ability of ANL/CCP to characterize waste from SCG S5000 (debris) using HSG sampling. ANL/CCP operations for HSG sampling of RH S5000 debris waste is performed using SUMMA[®] canisters.

The audit team identified one concern in this area, which was corrected during the audit. The concern related to inattention to detail in the transfer of information from field notes to the chain-of-custody (COC) form (see section 6.2)

Sampling BDR ANHSGS070001 was examined. Drum Age Criteria (DAC), sample COC, canister tags, quality control samples, and transfer to the analytical laboratory were reviewed and found to be compliant. Training and qualification of sampling individuals were confirmed to be acceptable to the CCP program through a list of

qualified individuals (LOQI). Interviews were conducted with the RH Manager and training personnel, with satisfactory results. The ANL/CCP procedures for HSG sampling using SUMMA[®] canisters were found to be adequate.

Overall, the audit team concluded that HSG activities were adequate, satisfactorily implemented, and effective.

5.2.5 Table B6-5 Radiography Checklist

This audit was performed to assess the ability of ANL/CCP to characterize and certify RH SCG S5000 debris waste. ANL/CCP is not presently performing radiography. If ANL/CCP should elect to perform radiography in the future, a CBFO certification audit will be required.

5.2.6 Table B6-6 Visual Examination Checklist

The audit team assessed the ability of ANL/CCP to characterize waste from SCG S5000 (debris) using VE. The VE process evaluated during the audit is performed by the review of video recordings prepared by ANL personnel when the waste was originally packaged. The video recordings are reviewed by qualified CCP VE operators and a BDR is prepared. ANL/CCP personnel also observe ANL operators packaging waste in the hot cell and document the process in a BDR. VE is performed in accordance with Procedures CP-TP-500, *CCP Remote-Handled Waste Visual Examination*, CCP-TP-163, Rev. 0, *CCP Standard VE of Records*, and CCP-TP-509, Rev. 1, *CCP Remote-Handled Transuranic Container Tracking*.

The audit team reviewed four BDRs (RHANLVE080001, RHANLVE080002, RHANLVE080004 and RHANLVE080005). The training course content for the VE expert (VEE) and operators was reviewed to verify that all WAP requirements were included. ANL/CCP VE training requirements are contained in the *Quality Assurance Project Plan (QAPJP)* and CCP-QP-002. Training files were reviewed for the VEE and three VE operators to verify that individuals responsible for performing the VE of containers have been properly trained and qualified.

No concerns were identified in the area of VE.

Overall, the audit team concluded that the VE activities were adequate, satisfactorily implemented, and effective.

5.3 General

Results of Previous Audits

The results of CBFO certification Audits A-07-03 and A-08-03 of ANL/CCP were examined and it was determined that the concerns identified in the audits have been addressed.

Changes in Programs or Operations

The HWFP portions of the audit were performed in accordance with the latest applicable B6 checklists, which incorporate all the Class 1, Class 2, and Class 3 modifications to the HWFP.

New Programs or Activities Being Implemented

ANL/CCP personnel observe ANL operations personnel packaging waste in the hot cell and document the process in a BDR. This process was evaluated during CBFO Audit A-08-03.

Changes in Key Personnel

No changes in ANL/CCP key personnel have occurred since the last certification audit.

6.0 SUMMARY OF DEFICIENCIES

6.1 Corrective Action Reports

During the audit, the audit team may identify conditions adverse to quality (CAQs) and document such conditions on corrective action reports (CARs).

Condition Adverse to Quality (CAQ) – Term used in reference to failures, malfunctions, deficiencies, defective items, and nonconformances.

Significant Condition Adverse to Quality – A condition which, if uncorrected, could have a serious effect on safety, operability, waste confinement, TRU waste-site certification, compliance demonstration, or the effective implementation of the QA program.

No WAP-related CBFO CARs were issued as a result of Audit A-08-24.

6.2 Deficiencies Corrected During the Audit

During the audit, the audit team may identify CAQs. The audit team members and the audit team leader (ATL) evaluate the CAQs to determine if they are significant. Once a determination is made that the CAQ is not significant, the audit team member, in conjunction with the ATL, determines if the CAQ is an isolated case requiring only remedial action and therefore can be corrected during the audit.

Upon determination that the CAQ is isolated, the audit team member, in conjunction with the ATL, evaluates/verifies any objective evidence/actions submitted or taken by the audited organization and determines if the condition was corrected in an acceptable manner. Once it has been determined that the CAQ has been corrected, the ATL categorizes the condition as a CDA according to the following definition:

CDAs – Isolated deficiencies that do not require a root cause determination or actions to preclude recurrence. Correction of the deficiency can be verified prior to the end of the audit. Examples include one or two minor changes required to correct a procedure (isolated), one or two forms not signed or not dated (isolated), and one or two individuals that have not completed a reading assignment.

One CDA, described below, was identified as a result of Audit A-08-24.

CDA 1

Field data were not transferred correctly from needle assembly equipment blank data and canister tag data to the field COC.

The ANL/CCP SPM resolved the items by noting the corrections of the COC on the SPM HSG Summa[®] Sampling Project-Level Validation Checklist and Summary recognizing the condition and items affected.

7.0 SUMMARY OF OBSERVATIONS AND RECOMMENDATIONS

During the audit, the audit team may identify potential problems or suggestions for improvement that should be communicated to the audited organization. The audit team members, in conjunction with the ATL, evaluate these conditions and classify them as Observations or Recommendations using the following definitions:

Observation – A condition that, if not controlled, could result in a CAQ.

Recommendations – Suggestions that are directed toward identifying opportunities for improvement and enhancing methods of implementing requirements. Once a determination is made, the audit team member, in conjunction with the ATL, categorizes the condition appropriately.

7.1 Observations

No Observations were provided to ANL/CCP management as a result of the audit.

7.2 Recommendations

The following Recommendation was presented to ANL/CCP management as a result of the audit.

Recommendation 1

It is recommended that the following changes be made to AK documents:

AK Summary Document CCP-AK-ANLE-500

1. Add AK Source Document C351 back into the list of relevant source documents in section 9.0 of the report.
2. In Table 7 on the waste stream DQO Determination Summary for the 10 WIPP Required Radionuclides, add Sr-90 to the radionuclides "consistently reported by the generator" based on the results in Table 6.
3. In section 5.4.1.2 on waste material parameters, change "1995" to "1993" in the first sentence.

In the AK Source Document Summary prepared for AK Source Document U083, correct the sentence that states that analytical results for specific Resource Conservation and Recovery Act (RCRA) metals exceed the RCRA regulatory authority.

8.0 LIST OF ATTACHMENTS

Attachment 1:	Personnel Contacted During the Audit
Attachment 2:	Personnel Contacted During the Audit by Area
Attachment 3:	Objective Evidence
Attachment 4:	Listing of Audited Documents
Attachment 5:	Processes and Equipment Evaluated During CBFO Audit A-08-24
Attachment 6:	Procedure Revision Matrix

PERSONNEL CONTACTED DURING THE AUDIT

PERSONNEL CONTACTED DURING AUDIT A-08-24				
NAME	ORG/TITLE	PRE-AUDIT MEETING	CONTACTED DURING AUDIT	POST-AUDIT MEETING
Atwood, Alyca	CCP/Training Coordinator		X	
Billett, Michele	CCP/Training Coordinator		X	
Brandjes, Chris	ANL/Waste Specialist		X	
Chavez, Christa	WTS/CCP NDA Support	X	X	
Crosson, Kevin	NOD/WM/ PM PK (Alt)		X	
Dietzel, Dale	DOE/ASO Fed. Proj Director	X		
Fisher, A. J.	CCP Training/Technical Advisor	X	X	
Frego, Jim	ANL/RH-TRU PM	X		X
Gatliffe, Thomas	WTS/CCP SPM		X	
Geller, Jay	ANL/QA Engineer	X		
Gomez, Chris	WTS/CCP QA Engineer	X	X	
Harvill, Joe	CCP/NDA Tech Specialist	X	X	
Hudston, Lisa	WTS/CCP NDA/DTC Support	X	X	
Joshi, Kaushik	DOE/ASO RH-TRU Project	X		
Kirkes, Creta	CCP/WCO		X	
Lewitt, Richard S.	CCP/MLU MLU Operator		X	
Mojica, Tommy	WTS/VEE/RH	X	X	
Neely, Hillari J.	WTS/CCP/SPM		X	
Pearcy, Sheila	CCP/Triumph/Records Mgr.		X	X
Peters, Kevin	CCP/AKE	X	X	
Porter, Larry	CCP/SPM	X	X	X
Quintana, Irene	CCP/SPM	X	X	X
Root, F. Wesley	CCP/PPM	X	X	
Smith, Tyrone	WTS/CCP M & TE		X	

PERSONNEL CONTACTED DURING AUDIT A-08-24				
NAME	ORG/TITLE	PRE-AUDIT MEETING	CONTACTED DURING AUDIT	POST-AUDIT MEETING
Stroble, J. R.	CBFO/NTP RH TRU Waste Certification Manager	X		X
Wade, Louis R.	CCP/QAE	X		X
Watson, Lisa	LANL/CCP/AKE		X	
Weyerman, C. Wade	CCP/MLU Field Ops Mgr		X	

PERSONNEL CONTACTED DURING THE AUDIT BY AREA

AREA OF EXPERTISE	NAME
Nonconformance/Corrective Action	Chris Gomez
Personnel Qualification and Training	Michele Billett Alyca Atwood
Records	Sheila Pearcy Joe P. Harvill Christa Chavez
Acceptable Knowledge	Lisa Watson Larry Porter Kevin Peters Irene Quintana Thomas Gatliffe
Visual Examination	Tommy Mojica Hillary J. Neely Michele Billett
Headspace Gas	Larry Porter Alyca Atwood
WWIS	Creta Kirkes

LISTING OF AUDITED DOCUMENTS

No.	Procedure Number	Revision	DOCUMENT TITLE
1.	CCP-PO-001	16	CCP Transuranic Waste Characterization Quality Assurance Project Plan
2.	CCP-PO-002	20	CCP Transuranic Waste Certification Plan
3.	CCP-QP-002	26	CCP Training and Qualification Plan
4.	CCP-QP-005	16	CCP TRU Nonconforming Item Reporting and Control
5.	CCP-QP-008	14	CCP Records Management
6.	CCP-QP-021	5	CCP Surveillance Program
7.	CCP-QP-028	8	CCP Records Filing, Inventorying, Scheduling, and Dispositioning
8.	CCP-TP-001	17	CCP Project Level Data Validation and Verification
9.	CCP-TP-002	20	CCP Reconciliation of DQOs and Reporting Characterization Data
10.	CCP-TP-003	16	CCP Data Analysis for S3000, S4000, and S5000 Characterization
11.	CCP-TP-005	18	CCP Acceptable Knowledge Documentation
12.	CCP-TP-093	13	CCP Sampling of TRU Waste Containers
13.	CCP-TP-106	6	CCP Headspace Gas Sampling Batch Data Report Preparation
14.	CCP-TP-160	0	CCP Random Selection of Containers for Headspace Gas Sampling and Analysis
15.	CCP-TP-163	0	CCP Standard Visual Examination of Records
16.	CCP-TP-500	7	CCP Remote-Handled Waste Visual Examination
17.	CCP-TP-506	2	CCP Preparation of the RH Transuranic Waste AK Characterization Reconciliation Report
18.	CCP-TP-507	3	CCP Shipping of Remote-Handled Transuranic Waste
19.	CCP-TP-530	6	CCP TRU Waste Certification and WWIS Data Entry
20.	WP 13-QA.03	14	Quality Assurance Independent Assessment Program

PROCESSES AND EQUIPMENT EVALUATED DURING AUDIT A-08-24

WIPP #	Process/Equipment Description	Applicable to the Following Waste Streams/Groups of Waste Streams	Currently Approved by NMED	Currently Approved by EPA
8RHVE1	Visual Examination CCP-TP-500, Remote-Handled Waste Visual Examination CCP-TP-163, CCP Standard Visual Examination of Records	Debris (S5000)	YES	YES (Records only)
8RHVE2	Visual Examination of Newly Packaged RH Waste Drums CCP-TP-500, Remote-Handled Waste Visual Examination	Debris (S5000)	YES	YES
Not Applicable	Acceptable Knowledge CCP-TP-005, CCP Acceptable Knowledge Documentation	Debris (S5000)	YES	YES
8HSG2	Headspace Gas Sampling CCP-TP-093, CCP Sampling of TRU Waste Containers	Debris (S5000)	YES	N/A
Not Applicable	Data verification and validation CCP-TP-001, CCP Project Level Data Validation and Verification CCP-TP-500, Remote-Handled Waste Visual Examination CCP-TP-504, CCP Dose-to-Curie Survey Procedure	Debris (S5000)	YES	YES
Not Applicable	Quality Assurance	N/A	N/A	YES

PROCEDURE REVISION MATRIX

ANL/CCP Annual Audit A-08-24

Previous ANL/CCP Annual Audit A-07-03

No	Procedure Number	Procedure Title	Revision During Last Annual Audit	Revision During Current Annual Audit	Brief Description of Procedure Changes
1	CCP-PO-001	CCP Transuranic Waste Characterization Quality Assurance Project Plan	R15	R16	16 - Revised to incorporate statistical terminology and text changes included in September 2007 Class 1 Permit Notifications and update Attachment 1, Implementing Procedures.
2	CCP-QP-002	CCP Training and Qualification Plan	R25	R26	26 - Revised to address U.S. Department of Energy (DOE) Carlsbad Field Office (CBFO) Corrective Action Report (CAR) 08-004.
3	CCP-QP-005	CCP TRU Nonconforming Item Reporting and Control	R15	R16	16 - Revised in response to Corrective Action Report (CAR) CAR-SRS-0001-08. Revised to address paragraph 1.3.2.4 D of DOE/CBFO-94-1012, <i>Quality Assurance Program Document (QAPD)</i> , Revision 9, regarding not solely relying on a single administrative control to differentiate waste containers that are acceptable for shipment to the Waste Isolation Pilot Plant (WIPP) from those containers that do not meet the WIPP waste acceptance criteria.
4	CCP-QP-008	CCP Records Management	R13	R14	14 - Revised to address finding from U.S. Department of Energy, Carlsbad Field Office, Corrective Action Report 07-016, Audit A-07-24. Also revised to provide some clarifications within the procedure, added a step to address superseding and voiding of documents (i.e., Batch Data Reports, Nonconformance Reports), and added a note at the beginning of section 4.9 to address computer modeling results methods.
5	CCP-QP-028	CCP Records Filing, Inventorying, Scheduling, and Dispositioning	R7	R8	8 - Revised to make minor editorial changes and to replace Attachment 1, Records Inventory and Disposition Schedule with new DOE form, DOE F 1324.10 (06-96).

PROCEDURE REVISION MATRIX

ANL/CCP Annual Audit A-08-24

Previous ANL/CCP Annual Audit A-07-03

No	Procedure Number	Procedure Title	Revision During Last Annual Audit	Revision During Current Annual Audit	Brief Description of Procedure Changes
6	CCP-TP-001	CCP Project Level Data Validation and Verification	R16	R17	17 - Revised to clarify the references in the attachments and to remove the 25%RPD limit for solids/soils co-located cores/samples from Attachments 6, 7, 8 and 9. Revised to remove Visual Examination (VE) Expert decisions and signature and date. Modifications were made to Sections 4.4, 4.5, and Attachments 6 through 9 to discuss the F-test and control charts.
7	CCP-TP-002	CCP Reconciliation of DQOs and Reporting Characterization Data	R19	R20	20 - Revised Section 4.2.1 to incorporate Central Characterization Project (CCP) Standing Order CCP-SO-32. Updated several document/procedure titles. Minor changes to Section 5.0.
8	CCP-TP-003	CCP Data Analysis for S3000, S4000, and S5000 Characterization	R15	R16	16 - Revised equations above Steps 4.1.2 [C] and 4.2.2 [C], changed TIC reporting requirements to be consistent with the Waste Isolation Pilot Plant Hazardous Waste Facility Permit (HWFP), Waste Analysis Plan (WAP), and minor editorial changes. Revised to incorporate statistical terminology and text changes included in September 2007 Class 1 HWFP Notifications.
9	CCP-TP-005	CCP Acceptable Knowledge Documentation	R18	R18	
10	CCP-TP-093	CCP Sampling of TRU Waste Containers	R13	R13	
11	CCP-TP-106	CCP Headspace Gas Sampling Batch Data Report Preparation	R6	R6	
12	CCP-TP-160	CCP Random Selection of Containers for Headspace Gas Sampling and Analysis	R0	R0	
13	CCP-TP-500	CCP Remote-Handled Waste Visual Examination	R5	R7	6 - Revised in response to Central Characterization Project (CCP) Corrective Action Report (CAR) CAR-RHBCL-00002-07, to clarify questions 11 and 12 on Attachment 2, Visual Examination Independent Technical Review Checklist.

PROCEDURE REVISION MATRIX

ANL/CCP Annual Audit A-08-24

Previous ANL/CCP Annual Audit A-07-03

No	Procedure Number	Procedure Title	Revision During Last Annual Audit	Revision During Current Annual Audit	Brief Description of Procedure Changes
					7 - Revised to address Carlsbad Field Office (CBFO) Corrective Action Report (CAR) 08-005.
14	CCP-TP-507	CCP Shipping of Remote-Handled Transuranic Waste	R1	R3	2 - Revised to incorporate CNS 10-160B requirements and to implement new Waste Isolation Pilot Plant (WIPP) Waste Acceptance Criteria (WAC) requirements. 3 - Minor editorial change to correct error in section cross references.
15	CCP-TP-530	CCP RH TRU Waste Certification and WWIS Data Entry	R5	R6	Revised to include the process for submitting transportation data only for the Battelle Columbus Laboratory (BCL) waste at Savannah River Site (SRS) using the CNS 10-1
NEW PROCEDURES ADDED TO CURRENT AUDIT					
1	CCP-PO-002	CCP Transuranic Waste Certification Plan		20	
2	CCP-QP-021	CCP Surveillance Program		5	
3	CCP-TP-163	CCP Standard Visual Examination of Records		0	
4	CCP-TP-506	CCP Preparation of the Remote-Handled Transuranic Waste Acceptable Knowledge Characterization Reconciliation Report		2	
5	WP 13-QA.03	Quality Assurance Independent Assessment Program		14	