Mr. James Bearzi  
Hazardous Waste Bureau  
New Mexico Environment Department  
2905 Rodeo Park Drive East, Building 1  
Santa Fe, New Mexico 87505-6303

Dear Mr. Bearzi:

On February 25, 2008, the New Mexico Environment Department (NMED) submitted to the U.S. Department of Energy, Carlsbad Field Office (CBFO) approval of the Final Audit Report for the Savannah River Site/Central Characterization Project (SRS/CCP) Audit Number A-08-01. In the letter, NMED raised additional concerns regarding CBFO’s responses to two of three observer inquiries. Regarding CBFO’s response to Observer Inquiry 08-002, NMED expressed a concern that CCP-TP-113 appears to grant the Visual Examination Expert (VEE) more discretion than is currently allowed under the permit and that the VEE signature on Attachment 4 of the Batch Data Report (BDR) fails to denote responsibility for any “VEE decisions” documented elsewhere in the BDR. NMED then recommended that CCP revise CCP-TP-113 to ensure the VEE responsibilities are entirely consistent with the Permit and that the significance of a VEE certification related to the review of a BDR be apparent at the point of signature.

Since the date of those responses, both CCP-TP-113 and the Visual Examination (VE) process has changed based on additional input from NMED for other reasons. Changes to the CCP VE process have taken away the ability of the VE expert to determine that a limited VE is appropriate. The verbiage that allowed this limited visual examination has been deleted from the Transuranic Waste Acceptance Criteria for the Waste Isolation Pilot Plan (DOE/WIPP 02-3122), Appendix G.

CCP-TP-113, Paragraph 3.2.3 provides the following as a responsibility of the VE expert: “Determines the extent of VE and waste segregation based upon the available Acceptable Knowledge (AK) data to achieve program objectives.” This allowance provides the person responsible for visual examination, the VE expert, the ability to direct the implementation of the visual examination process and make decisions to allow such actions as minimizing the handling of specific items to prevent worker injury and minimize radiation exposure while meeting all applicable requirements of the permit.

With respect to the delineation of the significance of a VEE certification related to the review of a BDR be apparent at the point of signature, CBFO does not feel that additional verbiage at the point of signature is warranted because the applicable
Mr. James Bearzi

-2-

October 2, 2008

CCP-TP-113, Step 4.7.1 currently states that the signature on Attachment 5 (previously Attachment 4) of the BDR is "to annotate that the proper VE determination was made, and VEE decisions are documented." In Observer Inquiry 08-003, NMED requested copies of the Savannah River Site/Site Technical Representative's (SRS/STR) comments on the AK-SRS-8 Summary for waste stream SR-MD-SOIL, correspondence documenting the final disposition of the SRS comments, and the final concurrence with assignment of Hazardous Waste Numbers (HWNs) to the above waste stream. Enclosure 1 contains copies of information requested. However the enclosure does not specifically address HWNs as the SRS STR had no comments on HWNs.

We believe that these inquiries have been addressed, and if you have any questions, please contact Donald C. Gadbury at (575) 234-7372.

Sincerely,

[Signature]

David C. Moody
Manager

Enclosure

cc: w/enclosure
S. Holmes, NMED HWB
Site Documents
CBFO M&RC

cc: w/o enclosure
C. Gadbury, CBFO  *ED
C. Fesmire, CBFO  ED
N. Castaneda, CBFO  ED
D. Miehls, CBFO  ED
M. Navarrete, CBFO  ED
F. Sharif, WTS  ED
D.K. Ploetz, WTS  ED
M. Pearly, WTS  ED
C. Simmons, WTS  ED
C. Riggs, CTAC  ED

*ED denotes electronic distribution
From: lee.fox@srs.gov [mailto:lee.fox@srs.gov]
Sent: Wednesday, December 29, 2004 6:37 AM
To: Ashford, Angela - L&M
Subject: Re: FW: SRS-8 Comments

Please re-issue the cover page without the "classification stamp". This must be obtained again after all revisions have been incorporated.

Otherwise I have no comments.

Lee Fox
SPS / CCP Interface STR
803-208-0778 / Pager 803-725-7243; ID #15457.
SRS STR Approval for CCP-AK-SRS-8 8 Which Includes Waste Stream SR-MD-SOIL, Revision 0

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Approval Status
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- ✔️ Conditional Approval

By ANGELA AISHFORD
On 12/25/04 12:21:10

Note
To Approver
From Approver
SRS STR
From lee.lee@hrs.gov
Sent: Wednesday, December 28, 2004 8:37 AM
From: joseph.damelio@ars.gov [mailto:joseph.damelio@ars.gov]
Sent: Tuesday, July 12, 2005 9:10 AM
To: Angela.Asford@wipp.wa
Cc: debra.lambert@ees.gov; lee.fox@ees.gov
Subject: CCP-AK-SRS-8, Rev 1 Draft A

SRS has reviewed SRS-8 Rev 1 Draft A and has the following comment:

Please revise Section 1.2, to specify that the 55 gallon drums have 0 layers of confinement, the other steel boxes have 3 layers of confinement and identify how many layers of confinement are in the SWE.

[attachment "CCP-AK-SRS-8-Rev1-DraftB071205.pdf" deleted by Lee Fox/WSRC/Srs]
SRS STR Comments for CCP-AK-SRS-8 Which Includes Waste Stream SR-MD-SOIL, Revision 1

-----Original Message-----
From: Jeff Harrison [mailto:Trash_Talk@msn.com]
Sent: Tuesday, July 12, 2005 9:46 AM
To: 'Ashford, Angela - L&M'
Cc: 'Cantu, Adela'
Subject: RH: CCP-AK-SRS-8, Rev 1 Draft A

Angie,

In resolving his comment, I also discovered something else that needs to be changed. Please make the following changes based on Joe's comment:

Section 2.2. Layers of Confinement: Change "None" to "None (55-gallon drums)" Underneath add "None (standard waste box)" Underneath that add "Three (large metal boxes)" [Angie, this should look similar to Section 2.1]

Section 6.5.2, 1st paragraph: Change "According to the TWCC forms, containers in this waste stream." to read "According to the TWCC forms, the large metal boxes in this waste stream ."

Jeff Harrison
720-977-7042 (work)

"Ashford, Angela - L&M" <Angela.Ashford@wipp.ws>

37/12/2005 12:22 PM

To: "Joseph D'Amelio (joseph.damelio@srs.gov)" <joseph.damelio@srs.gov>
cc: "Debra.Lambert@srs.gov" <Debra.Lambert@srs.gov>, "Lee Fox (Lee.Fox@srs.gov)" <Lee.Fox@srs.gov>, "Cantu, Adela" <Adela.Cantu@wipp.ws>, "Harrison, Jeff" <Trash_Talk@msn.com>

Subject: FW: CCP-AK-SRS-8, Rev 1 Draft A

Attached is Draft B of CCP-AK-SRS-8, Revision 1. Your comments have been addressed by Jeff Harrison (see below) and incorporated into Draft B.

Please provide additional comments/final approval via email ASAP. I need the final approval from Debbie Lambert since she is assigned to review/approve in Lee Fox's absence.

Thanks,
Angie
From: lee.fox@srs.gov
Sent: Monday, July 18, 2005 8:30 AM
To: Ashford, Angela - L&M
Subject: Re: FW: CCP-AK-SRS-8, Rev 1 Draft A

I did not see an approval from Dabbie. Just to cover the bases, I have no comments on the referenced AK report.

Lee Fox
SRS / CCP Interface STR
803-208-0778 / Pager 803-725-7243; ID #15457
SRS STR Approval for CCP-AK-SRS-8, Which Includes Waste Stream SR-MD-SOIL, Revision 1

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**Note From Approver**

Approved by Debra Lambert (see notes for delegation email).

From: debra.lambert@srs.gov
Sent: Tuesday, July 12, 2005 11:18 AM
To: Ashford, Angela - L&M
Subject: Re: FW: CCP-AK-SRS-8, Rev 1 Draft A

This is notification of approval of CCP-AK-SRS-8, Revision 1. Please let me know if further actions are needed.

Debbie Lambert
803-206-3256
From: lee.fox@srs.gov [mailto:lee.fox@srs.gov]
Sent: Wednesday, September 14, 2005 12:36 PM
To: Parks, Tarsee - L&M
Subject: Re: CCP-AK-SRS-8

SRS has no comments on the referenced AK.

Lee Fox
SRS / CCP Interface STR
863-205-6778 / Pager 803-725-7243; ID #15457
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**Approval Status**
- **APPROVED**
- **Conditional Approval**

**By** THERESA.PARKS
**On** 08/14/05 12:45:49

**To Approver** From Approver
**TR** From: lee.toe@arco.gov
**Smt** From: lee.toe@arco.gov
**Sent Wednesday, September 14, 2005 12:36 PM**
SRS STR Comments for CCP-AK-SRS-8 & Which Includes Waste Stream SR-MD-SOIL, Revision 3

From: lee.fox@ers.gov [mailto:lee.fox@ers.gov]
Sent: Monday, November 28, 2005 9:44 AM
To: Ashford, Angela - Triumph Tech
Cc: Lyshik, Gwen - Triumph Tech
Subject: Re: CCP-AK-SRS-8; Revision 3, Draft B

I have no comments on the referenced AK report.

Lee Fox
SRS/ CCP Interface STR
803-285-6778 / Pager 803-765-7243; ID: #15457

[detachments]

*Ashford, Angela - Triumph Tech <Angela.Ashford@wipp.wa>
11/23/2005 10:06 AM  To: *lee.fox@ers.gov  <lee.fox@ers.gov>
  *Lyshik, Gwen - Triumph Tech <Gwen.Lyshik@wipp.wa>
Subject: CCP-AK-SRS-8; Revision 3, Draft B

Hi Lee,

The attached AK report is in response to a corrective action. Please review ASAP and return comments/approval via email.

Thanks,
Angela Ashford
CCP Document Services
(505) 734-7262
[Attachment "CCP-AK-SRS-8-DraftB.pdf" deleted by Lee Fox/WSRC/Str]
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- By: DAMELU
- Date: 11/23/03
- Time: 00:45:43

To Approve:
- From: lee@bofurec.gov
- To: john@bofurec.gov
- Sent: Monday, November 26, 2005
- Time: 6:45 PM
SRS STR Comments for CCP-AK-SRS-88 Which Includes Waste Stream SR-MD-SOIL, Revision 4

From: lee.res@va.gov
Sent: Wednesday, August 29, 2007 2:48 PM
To: Lee Fox
Subject: CCP-AK-SRS-88, REVISION 4, DRAFT 2

I have attached to this email the referenced Attachment.

Lee

Cc: Lee Fox

Lee Fox

Attachment: CCP-AK-SRS-88, REVISION 4, DRAFT 2.pdf (216.2 KB)

Thank you,

Lynn

Enclosure

Page 11 of 12
SRS STR Approval for CCP-AK-SRS-8 8 Which Includes Waste Stream SR-MD-SOIL, Revision 4

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- 2nd Level: CANADA
- 3rd Level: MARK
- 4th Level: MARK

Date:
- 02/02/03

Approval Status:
-Final

Issued by:
- CANADA

Checked by:
- MARK

Dated:
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