



Department of Energy

Carlsbad Field Office
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November 7, 2008

CERTIFIED MAIL – RETURN RECEIPT

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: Transmittal of the Revised B6 Checklists for the Argonne National Laboratory/Central Characterization Project Audit A-08-24

Dear Mr. Zappe:

This letter transmits the revised B6 checklists for the subject audit. The documents were revised to address issues identified in a letter from the NMED dated October 31, 2008. Also enclosed is an attachment containing the responses to the NMED comments.

Please contact the CBFO Acting Quality Assurance Manager, Dennis S. Miehl, at (575) 234-7491, should you have any questions concerning this revised final audit report.

Sincerely,

David C. Moody
Manager

Enclosure



Mr. Steve Zappe

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November 7, 2008

cc w/o enclosure:

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cc: w/enclosures

RCRA Operating Record, MS: 452-09

CTAC QA File

CBFO M&RC

*ED denotes electronic distribution

**RESPONSES TO NMED COMMENTS ON THE ARGONNE NATIONAL
LABORATORY/CENTRAL CHARACTERIZATION PROJECT (ANL/CCP)
FINAL AUDIT REPORT A-08-24**

1. In questions 4a and 151 of the B6 checklist, the response is "NA" for procedures and objective evidence, with a comment that ANL/CCP is not seeking an AKSD. NMED notes that procedures for submitting AKSD requests were evaluated and cited in the B6 checklists for previous audits (e.g., A-07-03, A-07-14, A-08-01) even though the generator site was not seeking an AKSD. NMED recommends that the Permittees revise the B6 checklist for these two questions to be consistent with those previous audit reports and to preserve CCP's ability to request an AKSD at ANL if they choose to do so at some point in the future.

Response: Added procedural references to questions 4a and 151 to be consistent with previous audit reports (e.g., A-07-03, A-07-14, A-08-01).

2. The comment in B6 checklist questions 23 and 24 is "Solid Sampling is not in the scope of this audit" but there is no explanation why. NMED recommends that the Permittees provide the reason in the comment field.

Response: Added "because solid sampling is not performed at ANL/CCP at this time" to the comments section.

3. Prohibited items are not adequately addressed in CCP-TP-500. NMED has previously included this comment on other audit reports, and therefore recommends that the permittees' require CCP to revise the procedure to include a table of prohibited items, similar to Table 1 in CCP-TP-053, CCP-TP-113, and CCP-TP-508.

Response: Attachment 1 of CCP-TP-500 contains the recommended table.

4. In question 313 of the B6 checklist, the entry for procedures and objective evidence are "N/A" and the comment is "Any liquids found will be removed. VE is performed during packaging so any liquids will not be included in the container." The Permittees must cite a procedure that prohibits liquid from being placed in containers and requires the VE operators to remove liquid.

Response: Cited CCP-TP-500, CCP Remote-Handled Waste Visual Examination, section 1.1 and Attachment 1, and batch data reports RHANLVE080001, RHANLVE080002, RHANLVE080004, and RHANLVE080005.