



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

ENTERED

NOV 13 2008

OFFICE OF
AIR AND RADIATION

David Moody, PhD
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) baseline inspection (Inspection No. EPA-GEVNC-CCP-RH. 12.08-8) of the Central Characterization Project (CCP) at the General Electric Vallecitos Nuclear Center (GEVNC) near Pleasanton, California.

The EPA inspection is scheduled to take place December 2-4, 2008, in Pleasanton, California. EPA will evaluate the use of acceptable knowledge, visual examination, and radiological characterization implemented for characterizing a remote-handled (RH) transuranic (TRU) debris waste stream identified as GEVNC.01. EPA will also evaluate the use of the WIPP (Waste Isolation Pilot Plant) Waste Information System (WWIS) to track the contents of RH TRU waste.

During the week of October 27, 2008, EPA received GEVNC-CCP's RH waste characterization documents for review. As stated in a March 26, 2004 letter from EPA to Paul Detwiler of the Carlsbad Field Office, EPA approval of site-specific RH characterization plans is necessary prior to their implementation. EPA has made a sufficiency determination of the documents received recently, and with this letter, EPA informs the Central Characterization Project (CCP) that CCP may implement GEVNC-CCP's RH waste specific characterization documents to demonstrate to EPA compliance with the TRU waste characterization requirements.

The enclosed baseline inspection scope identifies the RH TRU waste characterization system of controls that will be evaluated during the inspection and the inspection schedule. Attachment A of the enclosure lists documents EPA inspectors must have no later than November 18, 2008.

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Please contact Ed Feltcorn, GEVNC-CCP RH Baseline Inspection Team Lead, at 202-343-9422, if you have any questions.

Sincerely,



Jonathan D. Edwards, Acting Director
Radiation Protection Division

Enclosure



cc: Electronic Distribution
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Steve Zappe, NMED
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**Scope of EPA's Baseline Inspection of GEVNC-CCP RH TRU
Waste Characterization Program
Inspection No. EPA-GEVNC-CCP-RH 12.08-8**

DOE Site: General Electric Vallecitos Nuclear Center-Central
Characterization Project (GEVNC-CCP)

Organizations Notified: Department of Energy – Carlsbad Field Office
New Mexico Environment Department
EPA Region IX

Inspection Dates: December 2-4, 2008

Inspection Schedule: Tuesday 8–9 am kick-off meeting*
Tuesday 9 am – 4 pm
Wednesday 8 am – 4 pm
Thursday 8 am – 2 pm
Thursday 4–5 pm close-out meeting*

*With GEVNC-CCP Management and technical leads

EPA Inspection Team: Ed Feltcorn – EPA Inspection Team Lead
Rajani Joglekar – EPA Inspector
Lindsey Bender – EPA Inspector
Patrick Kelly – EPA Inspector (SC&A)
Dorothy Gill – EPA Inspector (SC&A)
Connie Walker – EPA Inspector (SC&A)

Inspection Scope:

EPA will conduct a baseline inspection in accordance with 40 CFR 194.8 (b) to evaluate the adequacy, implementation, and effectiveness of technical processes implemented by GEVNC-CCP for characterizing a repackaged, remote-handled (RH) transuranic (TRU) debris (S5000) waste stream (GEVNC.01). EPA will evaluate this waste as a newly-generated waste.

Characterization Systems To Be Inspected:

From December 2-4, 2008, the following waste characterization components of the system of controls implemented by GEVNC-CCP will be evaluated under the inspection authority described in 40 CFR 194.8(b):

- Acceptable Knowledge (AK)
- Radiological Characterization (RC)
- Visual Examination (VE)
- WIPP Waste Information System (WWIS)

- Container Management – Assessed to the extent that is applicable to the system at the site

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

Governing Documents:

During the week of October 27, 2008, GEVNC-CCP provided electronic copies of the following documents:

- CCP-AK-GEV-500, Revision 1, *AK Summary Report*
- CCP-AK-GEV-501, Revision 0, *Central Characterization Project Remote-Handled Transuranic Radiological Characterization Technical Report For Remote-Handled Transuranic Debris Waste*
- CCP-AK-GEV-502, Revision 0, *Central Characterization Project Remote-Handled Transuranic Waste Certification Plan for 40 CFR Part 194 Compliance and Confirmation Test Plan for General Electric Vallecitos Nuclear Center Waste Stream: GEVNC.01.*

In addition, GEVNC-CCP provided the current versions of AK and RC procedures and other related site documents to facilitate EPA's preparation for the inspection. Approval by EPA of the use of the above listed documents for the purposes of characterization is required. EPA hereby approves these procedures. EPA will use these procedures and other documents to develop the inspection checklists that will be used to evaluate the adequacy of the program and its compliance with the waste characterization requirements at 40 CFR 194.24.

Additional Documents:

We prefer that the EPA-requested documents be provided electronically. When transmitting documents electronically, in addition to the EPA addressees, we request that they be distributed directly to the following EPA contractor staff at the email addresses shown: Patrick Kelly (ptkstl@aol.com), Connie Walker (conniewalk@aol.com), and Dorothy Gill (lcvcompany@netzero.net). For documents requested prior to the inspection for which a hard copy is the only option, we request that CBFO courier the hard copy to the respective EPA contractor staff listed above.

Attachment A lists documents that must be provided to EPA no later than November 18, 2008. Upon review of the documents listed in Attachment A, EPA may identify additional documents needed for inspection. The list for the additional documents (if any) will be sent to CBFO and CCP via email during the week before the GEVNC site inspection and must be provided to the EPA inspection team no later than the first day of the inspection, December 2, 2008.

Inspection Logistics:

- On Tuesday November 18, 2008, a conference call will be held at 11:30 AM Eastern (call in number 1-866-299-3188 conference number 2023439462#) for all inspection participants to discuss the following:
- EPA Inspector (Edward Feltcorn) will review:
 - The baseline inspection details.
 - Any inspection related questions that GEVNC-CCP management and technical leads may have.
 - GEVNC-CCP (management and technical leads) will inform EPA of revisions to technical procedures, if any, and other relevant operational details prior to the inspection.
 - CBFO will inform EPA of any programmatic issues that may have a bearing on the EPA inspection.
 - During this call, GEVNC-CCP must inform EPA of the locations for the pre inspection briefing on December 2, 2008, the daily status updates at 8:00 am on December 3 and 4, 2008 and the post-inspection EPA briefing for the appropriate GEVNC-CCP management on December 4, 2008, at 4 pm
- For the GEVNC onsite inspection, 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 December 2-4, 2008, from approximately 8 am – 4 pm.
- CBFO QA is welcome to provide observers for the EPA inspection.

Attachment A
Information Needed In Advance for
EPA Inspection No. EPA-GEVNC-CCP-RH-12.08-8

If possible, please provide these documents to EPA by November 18, 2008, preferably in electronic format.

Radiological Characterization (RC)

- Calculation packages, all of them
- BDRs, if they exist
- List of all characterized containers
- Freeze file changes to 501 & Calc packages

Acceptable Knowledge (AK)

- Waste Stream Profile Form (Draft is OK if that's all that is available)
- CCP-AK-503 for GEVNC (if applicable)
- Characterization Reconciliation Report
- AK Accuracy Report
- AK-NDA Memo(s)
- List of fully characterized containers (for BDR selection and traceability analysis)
- List of Available Databases that may contain AK information
- Full Reference List (CCP-TP-005 Attachment 4 for the GEVNC waste stream)

Visual Examination (VE)

- Qual cards/LOQI for VE personnel
- List of completed VE BDRs
- Standing Orders that are in place
- List of VE related NCRs

WIPP Waste Information System (WWIS)

- The number of containers that have been characterized and/or certified
- Name of the WWIS person for this site
- Qual cards/LOQI for all WWIS personnel
- Inform EPA of the method of demonstration available at the site — strongly prefer on site during the inspection