

ENTIRED



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

NOV 25 2008

OFFICE OF
AIR AND RADIATION

Mr. Casey Gadbury
Manager, National TRU Program
Carlsbad Field Office
U.S. Department of Energy
P.O. Box 3090
Carlsbad, NM 88221



Dear Mr. Gadbury:

This letter transmits the scope of the Environmental Protection Agency's (EPA) Tier 1 (T1) change inspection of the visual examination (VE) process(es) implemented by the Central Characterization Project (CCP) at the Idaho National Laboratory (INL), Idaho Falls, ID.

EPA will inspect INL CCP's implementation of a VE process concurrently with the Carlsbad Field Office's (CBFO) audit scheduled for December 9-11, 2008, in Carlsbad, New Mexico. In the CBFO letter dated November 13, 2008, CBFO stated that "this change does not reflect the addition of a new vendor . . . [and that it] is a Tier II change." Upon review of information provided with your letter, we have determined that the proposed VE process is a T1 change. The enclosed T1 change inspection scope provides inspection details.

Please contact Ed Felcorn (202 343 9422) or Rajani Joglekar (202 343 9462), if you have any questions.


Sincerely,

Tom Peake, Director
Center for Waste Management and Regulations

Enclosure



cc: Electronic Distribution
Frank Marcinowski, DOE EM
Jonathan Edwards, EPA HQ
Alton Harris, DOE EM
Jerry Wells, DOE Idaho
Dave Moody, CBFO
Vernon Daub, CBFO
Courtland Fesmire, CBFO
J.R. Stroble, CBFO
Norma Castaneda, CBFO
Martin Navarrete, CBFO
Dennis Miehl, CBFO
Allison Pangle, CTAC
Wayne Ledford, CTAC
Steve Zappe, NMED

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Scope of EPA's Tier 1 Change: INL-CCP Visual Examination (VE)

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

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

Inspection Location: Carlsbad Field Office, Carlsbad, NM

Inspection Dates: December 9-10, 2008

Inspection Schedule: Tuesday 8:00 am – 4:00 pm, Begin Inspection
Wednesday 8:00 am – 2:00 pm, Conduct Inspection
Wednesday 3:00 – 3:30 pm, Close-out Meeting

EPA Inspector: Dorothy Gill, EPA Contractor (SC&A)

Inspection Scope:

EPA will conduct a Tier 1 evaluation in accordance with 40 CFR 194.8(b) to evaluate the adequacy, implementation, and effectiveness of the proposed technical process(es) to be implemented by INL-CCP for visual examination (VE) for confirmation of physical characteristics documented in the acceptable knowledge (AK) for retrievably-stored and newly generated, repackaged, CH TRU debris, soils and solid waste.

Characterization Systems To Be Inspected:

The EPA inspection will include evaluating VE procedures CCP-TP-113 and CCP-TP 163 that are used to determine the contents of TRU waste containers for confirming corresponding AK information. EPA may evaluate personnel qualifications/training (by review of records and conducting interviews), operating procedures, and tests of equipment to determine regulatory compliance and assess the adequacy of the VE process.

Governing Documents:

- CCP-TP-113, Standard Contact-Handled Waste Visual Examination, Revision 11, Effective Date 11/12/08
- CCP-TP-163, Standard Visual Examination of Records, Revision 1, Effective Date 11/12/08

Additional Documents:

During the inspection, EPA may require additional documents, such as a list of or specific examples of Batch Data Reports (BDRs). In addition EPA requests that some documents be provided prior to beginning the inspection. The documents include the following:

- A list of BDRs through project level review and the availability to examine written and visual records for all the BDRs
- A list of qualified personnel (operators and subject matter experts) and qualification packages for all qualified personnel
- A copy of the AK summary for the waste stream(s) processed in the completed BDRs.

In addition, EPA requests to witness a demonstration of the VE process being evaluated.

Inspection Logistics:

The EPA Inspector will coordinate with CBFO QA audit team to conduct Inspection Opening and Close-out Meetings.