



Department of Energy
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OCT 4 2010

Mr. Steve Zappe, Project Leader
Hazardous Materials 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 CBFO Audit A-10-08 of the ORNL/CCP

Dear Mr. Zappe:

Enclosed are the revised B6-4 and B6-5 checklists for Carlsbad Field Office (CBFO) Audit A-10-08 of the Oak Ridge National Laboratory Central Characterization Project (ORNL/CCP). The checklists were revised to address issues identified in a letter from the New Mexico Environment Department (NMED) dated August 12, 2010. Also enclosed are the CBFO responses to the NMED comments.

Should you have any questions, please contact Ms. Ava L. Holland, CBFO Director of Quality Assurance, at (575) 234-7423.

Sincerely,

David C. Moody
Manager

Enclosure

Mr. Steve Zappe

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October 4, 2010

cc: w/o enclosures

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WIPP Operating Record, MS: 452-09

CTAC QA File

CBFO M&RC

**RESPONSES TO NMED COMMENTS ON THE OAK RIDGE NATIONAL
LABORATORY CENTRAL CHARACTERIZATION PROJECT (ORNL/CCP)
FINAL AUDIT REPORT A-10-08**

1. In question 219 of the B6 Checklist, the question was not answered correctly and the note in the 'Comment' column is incorrect. In Permit Attachment B1, Section B1-6, Sample Packing and Shipping, the third paragraph, the fifth and sixth sentences refer to both headspace gas samples and solids samples. The citation reads as follows: "*All shipping containers will contain appropriate blank samples to detect any VOC cross-contamination. A DOT approved cooler, or similar package may be used as the shipping container.*" The answer to the question needs to be addressed by providing objective evidence in the 'Item Reviewed' column; answering the question for adequacy in the 'Adequate? Y/N' column, and deleting the comment in the 'Comment' column.

Response: Added procedure reference and entered "Y" in adequacy column. Added objective evidence (HSG BDRs ORHSGS090002 and ORHSGS090009) and entered "Y" in adequacy column.

2. In question 234 of the B6 Checklist, BDR OR-RTR6-0233 is listed as objective evidence that procedures to ensure RTR is used to "verify the waste's physical form" were implemented. However, CBFO issued CAR 10-017 because both the operator and the ITR incorrectly identify the Waste Matrix Code, i.e., the "physical form of the waste," for container X10C0506047 in BDR OR-RTR6-0233. Revise the B6 Checklist to include a note of this in the comment section.

Response: Added the following comment to B6-5 item 234 comment section: "As a result of the audit, CBFO issued CAR 10-017. The container contents in Container X10C0506047 in BDR OR-RTR6-0233 did not match the physical form of the waste."

3. Question 236 of the B6 Checklist asks for objective evidence that procedures are in place to ensure that containers whose contents cannot be fully examined are characterized using VE or AK. CCP-TP-053 is listed as the implementing procedure and requires the RTR operator to initiate an NCR if the waste cannot be penetrated, i.e., fully examined. BDR OR-RTR6-0233 was inspected as part of the audit, but was not listed as objective evidence. CBFO issued CAR 10-018 because there were several drums in the BDR that had impenetrable items and for which no NCRs were initiated. Revise the B6 Checklist to include BDR OR-RTR6-0233 as objective evidence and include a note regarding CAR 10-018 in the comment section.

Response: Added the following comment to B6-5 item 236 comment section: "As a result of the audit, CBFO issued CAR 10-018. Several containers in BDR OR-RTR6-0233 consisted of impenetrable material in which no NCRs were initiated."