



Department of Energy
Carlsbad Field Office
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OCT 14 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 Revised Response and Revised B6 Checklist Addressing NMED
Comment Associated with CBFO Audit A-10-14, LANL/CCP

Dear Mr. Zappe:

The New Mexico Environment Department (NMED) comments to the Los Alamos National Laboratory Central Characterization Project (LANL/CCP) Final Audit Report A-10-14 were transmitted to the Carlsbad Field Office (CBFO) in the NMED approval letter dated September 22, 2010. The initial response to the comments were transmitted in letter CBFO:QA:DSM:MAG:10-1825:UFC 2300.00 dated October 6, 2010.

Enclosed is the response and revised B6 checklist addressing NMED Comment #2. The revision was made as a result of your request communicated in a teleconference on October 12, 2010 with Mr. Dennis Miehl, CBFO, and Mr. Porf Martinez, Portage, Inc.

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

Sincerely,

Edward Ziemianski
Acting Manager

Enclosure

Mr. Steve Zappe

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OCT 14 2010

cc: w/o enclosure

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WIPP Operating Record, MS: 452-09
CBFO QA File
CBFO M&RC

REVISED
RESPONSE TO NMED COMMENT #2 ON THE LANL/CCP
FINAL AUDIT REPORT A-10-14

2. *In question 313 of the B6 Checklist, there is no basis in the Revision 13 of CCP-TP-113 (included in the audit report) for the following statement in the comments column: "Although this approach is allowed by the Permit for non-transparent containers, CCP would conservatively reject such a container as not containing as little residual liquid as is reasonably achievable." This is, however, addressed in revision 14. The Permittees must revise this comment or cite (and submit) revision 14 as the implementing procedure.*

Response: Added procedure reference to section 4.0 (Note) of CCP-TP-113 and deleted comment.

**Table B6-6 Visual Examination (VE) Checklist
LANL/CCP Recertification Audit, A-10-14, April 27 – 29, 2010**

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Visual Examination (VE) Checklist

	WAP Requirement ¹ LANL/CCP Recertification Audit, A-10-14 Table B6-6 Visual Examination (VE) Checklist	Procedure Documented		Example of Implementation/ Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why)	Item Reviewed	Adequate? Y/N	
TRAINING						
296	Is there documentation which shows that a standardized training program for visual examination personnel has been developed? Is it specific to the site and include the various waste configurations generated/stored at the site? (Section B1-4)	CCP-PO-001 S. B1-4 CCP-QP-002 S. 4.1.3[E.3] S. 4.2.6	Y	Training Files (GEN-16)	Y	
297	Is there documentation which shows that the visual inspectors receive training on the specific waste generating processes, typical packaging configurations, and waste material parameters expected to be found in each waste matrix code at the site? (Section B1-4)	CCP-PO-001 S. B1-4 CCP-QP-002 S. 4.1.3[E.3] S. 4.2.6	Y	Training Files (GEN-16)	Y	
298	Are the visual examination personnel requalified once every two years? (Section B1-4)	CCP-PO-001 S. B1-4 CCP-QP-002 S. 4.1.3[F]	Y	Training Files (GEN-16)	Y	
VISUAL EXAMINATION EXPERT REQUIREMENTS						
300	Does documentation ensure that the site has designated a visual examination expert? Is the visual examination expert familiar with the waste generating processes that have taken place at the site? Is the visual examination expert familiar with all of the types of waste being characterized at that site? (Section B1-4)	CCP-PO-001 S. B1-4 CCP-QP-002 S. 4.2.6[C] S. 4.3 NOTE 4.3.1	Y	Training Files (GEN-16)	Y	
301	Does documentation ensure that the visual examination expert shall be responsible for the overall direction and implementation of the visual examination aspects of the program? Does the site's QAPJP specify the selection, qualification, and training requirements of the visual examination expert? (B1-4)	CCP-PO-001 S. B1-4 CCP-QP-002 S. 4.2.6[C] S. 4.3 NOTE S. 4.3.1	Y	Training Files (GEN-16)	Y	
VISUAL EXAMINATION PROCEDURES						
304	Do procedures indicate that all visual examination activities are recorded on audio/videotape or alternatively, by using a second operator to provide additional verification by reviewing the contents of the waste container to ensure correct	CCP-TP-113 S. 1.1	Y	BDRs: LAVE500335	Y	

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		Location	Adequate? Y/N (Why)	Item Reviewed	Adequate? Y/N	
	reporting? (Section B1-4)	CCP-TP-069 (All)		LAVE500290 LAVE500234 LAVE500222 LAVE550030 LAVE550025 LAVE550021 LAVE2310001 LA-09- SR-VE-017 LA-09- SR-VE-015 LA-09- SR-VE-005 LA-09- SR-VE-003 (VE-1)		
313	Do site procedures ensure that when liquids are found, the non-transparent container holding the liquid will be assumed to be filled with liquid and this volume will be added to the total liquid in the payload container? The payload container would then be rejected and/or repackaged to exclude the container if it is over the TSDF-WAC limits. (Section B-3c)	CCP-TP-113, S. 4.0 (Note), 4.4 & Table 1 CCP-TP-069 Att. 4	Y	BDRs: LAVE500335 LAVE500290 LAVE500234 LAVE500222 LAVE550030 LAVE550025 LAVE550021 LAVE2310001 LA-09- SR-VE-017 LA-09- SR-VE-015 LA-09- SR-VE-005 LA-09- SR-VE-003 (VE-1)	Y	Although this approach is allowed by the Permit for non-transparent containers, CCP would conservatively reject such a container as not containing as little residual liquid as is reasonably achievable. <u>Deleted as per teleconference with S. Zappe, D. Miehl, and P. Martinez on 10/12/10.</u>

	WAP Requirement ¹ LANL/CCP Recertification Audit, A-10-14 Table B6-6 Visual Examination (VE) Checklist	Procedure Documented		Example of Implementation/ Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
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314	<p>Are process procedures in place to meet the following Quality Assurance Objectives?:</p> <p><u>Precision</u></p> <p>Precision is maintained by reconciling any discrepancies between the operator and the independent technical reviewer with regard to identification of waste matrix code, liquids in excess of TSDF-WAC limits, and compressed gases.</p> <p><u>Accuracy</u></p> <p>Accuracy is maintained by requiring operators to pass a comprehensive examination and demonstrate satisfactory performance in the presence of the VE expert during their initial qualification and subsequent requalification.</p>	CCP-TP-113 S. 4.8 Att. 3 CCP-TP-069 S. 4.3 Att. 7 CCP-PO-001 S. B1-4 CCP-QP-002 S. 4.2.6	Y	BDRs: LAVE500335 LAVE500290 LAVE500234 LAVE500222 LAVE550030 LAVE550025 LAVE550021 LAVE2310001 LA-09- SR-VE-017 LA-09- SR-VE-015 LA-09- SR-VE-005 LA-09- SR-VE-003 (VE-1)	Y	<p>Precision, accuracy, and completeness are verified during ITR review per CCP-TP-113 and CCP-TP-069.</p> <p>Comparability is assured via the training program described in CCP-PO-001 and CCP-QP-002.</p> <p><u>(Revised per NMED comments on Final Report, 23SEP10)</u></p>

	WAP Requirement ¹ LANL/CCP Recertification Audit, A-10-14 Table B6-6 Visual Examination (VE) Checklist	Procedure Documented		Example of Implementation/ Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
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314a	<p><u>Completeness</u></p> <p>A validated VE data form will be obtained for 100 percent of the waste containers subject to VE.</p> <p><u>Comparability</u></p> <p>The comparability of VE data from different operators shall be enhanced by using standardized VE procedures and operator qualifications.</p> <p>(Section B3-4b)</p>	CCP-TP-113 S. 4.8 Att. 3 CCP-TP-069 S. 4.3 Att. 7 CCP-PO-001 S. B1-4 CCP-QP-002 S. 4.2.6	Y	BDRs: LAVE500335 LAVE500290 LAVE500234 LAVE500222 LAVE550030 LAVE550025 LAVE550021 LAVE2310001 LA-09- SR-VE-017 LA-09- SR-VE-015 LA-09- SR-VE-005 LA-09- SR-VE-003 (VE-1)	Y	<p>Precision, accuracy, and completeness are verified during ITR review per CCP-TP-113 and CCP-TP-069.</p> <p>Comparability is assured via the training program described in CCP-PO-001 and CCP-QP-002.</p> <p><u>CBFO CAR 10-25</u></p> <p><u>It was observed during the Audit that raw data, generated in the hotcell during VE activities, is being discarded after transferring the information to the VE data sheets and is not available for ITR review to verify proper transference of data from field records.</u></p> <p><u>(Revised per NMED comments on Final Report, 23SEP10)</u></p>

1. The WAP requirements should be presented in documents, such as procedures. Each of the questions posed under WAP requirements is meant to ask whether procedures are in place or whether documents are evident which demonstrate that the specific WAP requirement is or can be met.