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Sent: Tuesday, November 02, 2010 12:54 PM
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Subject: INL Continued Compliance Inspection - Scope for November 16-17
Attachments: Scope of EPA's Continue Compliance Inspection dated Nov 16-17.pdf



Scope of EPA's
Continue Compl...

(See attached file: Scope of EPA's Continue Compliance Inspection dated Nov 16-17.pdf)

Please forward to anyone I left off inadvertently.
Please note the call on weds of next week at 1PM eastern.

Thanks
Ed Feltcorn



Scope of EPA's Continued Compliance Evaluation at INL-CCP

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

Organizations Notified: Department of Energy – Carlsbad Field Office
Department of Energy – Idaho Office
EPA Region 10
New Mexico Environment Department

Evaluation Dates: November 16-17, 2010

Evaluation Schedule:	Tuesday 8:00	Kick-Off Meeting*
	Tuesday 8:30 am – 4:00 pm	Conduct Inspection
	Wednesday 8:00 am – 2:30 pm	Conduct Inspection
	Wednesday 4:00 pm	Close-Out Meeting*

* With CBFO National TRU Program staff, DOE-INL, and INL-CCP technical leads

EPA Evaluation Team:

Mr. Ed Felcorn, EPA Lead Inspector
Ms. Rajani Joglekar, EPA Inspector
Ms. Lindsey Bender, EPA Inspector
Ms. Kathleen Economy, EPA Observer
Mr. Patrick Kelly, EPA Support Contractor (SC&A)
Ms. Connie Walker, EPA Support Contractor (SC&A)
Ms. Dorothy Gill, EPA Support Contractor (SC&A)
Ms. Kira Darlow, EPA Support Contractor (SC&A)
Ms. Rose Gogliotti, EPA Support Contractor (SC&A) Observer

Evaluation Scope:

EPA will conduct a continued compliance evaluation in accordance with 40 CFR 194.8(b) to evaluate the adequacy, implementation, and effectiveness of selected technical processes implemented by INL-CCP for characterizing contact-handled (CH) and remote-handled (RH) transuranic (TRU) waste. The specific items to be evaluated include the following:

1. CH-TRU

- Review the most recent Acceptable Knowledge Summary Reports (AKSRs) for:
 - Accelerated Retrieval Project (ARP) debris (S5000), solids (S4000), and soils (S3000) waste categories; and
 - Wastes from small quantity sites (SQS)
- Review at least one Waste Stream Profile Form (WSPF) for each of the CH waste categories disposed of at the Waste Isolation Pilot Plant (WIPP) since October 1, 2009

- Review of EPA-selected* Batch Data Reports (BDRs) for ARP and SQS wastes characterized since October 1, 2009 for the following characterization techniques:
 - Non Destructive Assay (NDA); and
 - Visual Examination (VE) and/or Real-Time radiography
 - VE/Radiography (RTR training records through interviews of personnel)
- Evaluate WAGS and SuperHENC
- Perform replicate evaluation on three EPA-selected* containers previously assayed on WAGS
- Evaluate NDA and VE/RTR training through interviews of personnel, training records, and examination of training materials.

2. RH-TRU

- Review the most recent AKSRs for **all** RH waste streams approved since September 2009;
- Review the WSPFs for **all** RH waste streams disposed of at the WIPP since October 1, 2009
- Review EPA-selected BDRs for the following:
 - Non Destructive Assay; Dose-to-Curie (DTC); and
 - Visual Examination and Real-Time radiography
- Evaluate VE/RTR training records through interviews of personnel, training records, and examination of training materials.

3. Tier 2 Procedures

- EPA will evaluate Tier 2 procedures implemented in FY 2009 and 2010 at INL-CCP.
- A list of the EPA-selected procedures will be provided to CBFO and INL-CCP on Wednesday, November 10, 2010.

*EPA will need a list of NDA, DTC, VE, and RTR BDRS for the waste types mentioned above BDRs no later than Tuesday, November 9, 2010 from which EPA will select representative BDRs for review during the inspection.

Pre-Evaluation Conference Call:

A conference call between EPA and INL-CCP staff will be held on Wednesday, November 10, 2010, at 1:00 PM EDT to review the scope of EPA's inspection and identify additional document

needs. The telephone number for the call is 1-866-299-3188, and the participant code is 2023439462#.

Logistics:

- A pre-evaluation conference/Kick-Off Meeting will be held Tuesday, November 16, 2010 at a location designated by INL-CCP at 8:00 am.
- A post-evaluation EPA briefing/Close-Out Meeting will be on Wednesday, November 17, 2010, at 4:00 pm for this evaluation.

CBFO NTP and QA are invited to send observers to this activity.