

United States Government

Department of Energy

memorandum

Carlsbad Field Office
Carlsbad, New Mexico 88221



DATE: JAN 7 2011
REPLY TO
ATTN OF: CBFO:OQA:MPN:MAG:11-0411:UFC 2300.00
SUBJECT: Recertification Audit A-11-08 of the ORNL/CCP
TO: William (Bill) McMillan, ORNL

The Carlsbad Field Office (CBFO) will conduct Audit A-11-08 of the Oak Ridge National Laboratory (ORNL) in compliance with the Hazardous Waste Facility Permit, Attachment C6, utilizing the subcontracted services of the Washington TRU Solutions Central Characterization Project (CCP) for the recertification of contact-handled and remote-handled transuranic waste characterization activities. The audit is scheduled for February 8-10, 2011 and will be conducted in accordance with the attached audit plan. Representatives from the New Mexico Environment Department may be present to observe the audit.

Your representatives are requested to coordinate with the audit team to provide the team access to the ORNL/CCP facilities, the appropriate space to conduct meetings, and cognizant personnel to support the audit, as well as access to the appropriate documentation and records.

If you have any questions concerning this audit, please contact me at (575) 234-7483.

Sincerely,

Martin P. Navarrete
Martin P. Navarrete
Acting Quality Assurance Director

Attachment

- cc: w/attachment
- J. R. Stroble, CBFO *ED
- N. Castaneda, CBFO ED
- C. Fesmire, CBFO ED
- T. Morgan, CBFO ED
- D. Miehl, CBFO ED
- D. Haar, WTS/CCP ED
- D. Ploetz, WTS/CCP ED
- V. Cannon, WTS/CCP ED
- A. J. Fisher, WTS/CCP ED
- M. Walker, WTS/CCP ED
- Y. Salmon, WTS/CCP ED
- T. Peake, EPA ED
- M. Eagle, EPA ED
- E. Feltcorn, EPA ED
- R. Joglekar, EPA ED
- S. Ghose, EPA ED
- R. Lee, EPA ED
- S. Zappe, NMED ED
- S. Holmes, NMED ED
- T. Kesterson, DOE OB WIPP NMED ED
- D. Winters, DNFSB ED
- P. Gilbert, LANL-CO ED
- G. Lyshik, LANL-CO ED
- P. Martinez, CTAC ED
- P. Hinojos, CTAC ED
- K. D. Martin, CTAC ED
- WIPP Operating Record ED
- CBFO QA File
- CBFO M&RC
- *ED denotes electronic distribution



CARLSBAD FIELD OFFICE AUDIT PLAN

Audit Number: A-11-08

Organization to be Audited: Oak Ridge National Laboratory (ORNL), Washington TRU Solutions LLC (WTS) Central Characterization Project (CCP)

Organizations to be Notified: ORNL
WTS
New Mexico Environment Department (NMED)
Defense Nuclear Facilities Safety Board (DNFSB)
Environmental Protection Agency (EPA)

Date and Location: February 8 – 10, 2011
Oak Ridge, Tennessee, and Carlsbad, New Mexico

Audit Team:

Porf Martinez	Audit Team Leader, CBFO Technical Assistance Contractor (CTAC)
Charlie Riggs	Auditor, CTAC
Earl Bradford	Auditor, CTAC
Prissy Martinez	Auditor, CTAC
Greg Knox	Auditor, CTAC
Katie Martin	Auditor, CTAC
Cindi Castillo	Auditor, CTAC
Dick Blauvelt	Technical Specialist, CTAC
B. J. Verret	Technical Specialist, CTAC
James Oliver	Technical Specialist, CTAC
Rhett Bradford	Technical Specialist, CTAC
Paul Gomez	Technical Specialist, CTAC
Thomas Putnam	Technical Specialist, CTAC
Joe Willis	Technical Specialist, WTS
Robbie Morrison	Technical Specialist, WTS

Audit Scope:

The audit team will evaluate the adequacy, implementation, and effectiveness of the ORNL/CCP technical and quality assurance (QA) activities performed at ORNL for characterization and certification of contact-handled (CH) S4000 soils waste, S5000 debris waste, and remote-handled (RH) S5000 debris waste. The audit will include an evaluation of transportation activities performed at the ORNL for shipping of CH and RH TRU waste to the Waste Isolation Pilot Plant.

See the attached "Process and Equipment to be Reviewed During Audit A-11-08 of ORNL/CCP" for additional details.

Governing Documents/Requirements

Evaluation of the overall program adequacy and effectiveness of ORNL/CCP documents will be based on the current revisions of the following documents:

- *Quality Assurance Program Document (QAPD)*, DOE/CBFO-94-1012
- *Hazardous Waste Facility Permit (HWFP)*, Waste Isolation Pilot Plant EPA No. NM4890139088-TSDF, the New Mexico Environment Department
- *Transuranic Waste Acceptance Criteria for the Waste Isolation Pilot Plant (WAC)*, DOE/WIPP-02-3122
- *Remote-Handled Transuranic Waste Characterization Program Implementation Plan (WCPIP)*, DOE/WIPP-02-3214
- *TRUPACT-II Safety Analysis Report: TRUPACT-II Authorized Methods for Payload Control (TRAMPAC)*, and the TRUPACT-II Certification of Compliance, NRC 71-9281
- *Waste Isolation Pilot Plant Flammable Gas Analysis*, DOE/WIPP-06-3345

Programmatic and technical checklists will be developed from the current revisions of the following documents:

- *CCP Transuranic Waste Quality Assurance Characterization Project Plan (QAPjP)*, CCP-PO-001
- *CCP Transuranic Waste Certification Plan*, CCP-PO-002
- *CCP Transuranic Authorized Methods for Payload Control (CCP CH-TRAMPAC)*, CCP-PO-003
- *CCP Remote-Handled Transuranic Waste Authorized Methods for Payload Control (CCP RH-TRAMPAC)*, CCP-PO-505
- Related CCP quality assurance and technical implementing procedures

Activities to be Audited:

General

- Results of previous audits
- Changes in programs or operations
- New programs or activities being implemented
- Changes in key personnel

Quality Assurance

The following general areas from section C6-1 of the HWFP:

- Nonconformances
- Personnel Qualification and Training
- Records

Technical Activities

- Generator and Project Level Data Validation & Verification (V&V) -
- Acceptable Knowledge (AK) -
- Real-time Radiography (RTR) -
- Visual Examination (VE) -
- Headspace Gas (HSG) Sampling -
- Nondestructive Assay (NDA) -
- Radiological Characterization (dose to curie [D-T-C]) -
- Waste Certification (e.g., Waste Stream Profile Form)
- Transportation (including Flammable Gas Analysis)
- WIPP Waste Information System (WWIS)/Waste Data System (WDS) -

Schedule of Audit Activities:

A pre-audit conference is scheduled for Tuesday, February 8, 2011, at 8:00 a.m.

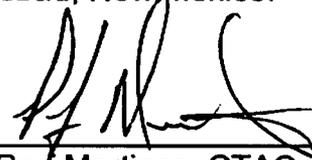
Audit team caucus meetings will be held Tuesday, February 8, and Wednesday, February 9, 2011, at 4:00 p.m., and Thursday, February 10, 2011, at 2:00 p.m.

The audit team leader will conduct a management briefing with appropriate ORNL and CCP management Wednesday, February 9, and Thursday, February 10, 2011, at 8:30 a.m.

A post-audit conference is scheduled for Thursday, February 10, 2011, at 4:00 p.m.

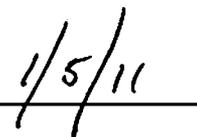
All meetings will take place at the designated locations in Oak Ridge, Tennessee, and Carlsbad, New Mexico.

Prepared by:



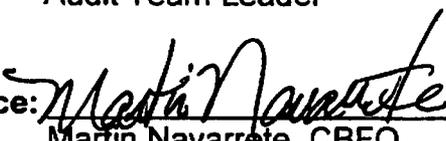
Porf Martinez, CTAC
Audit Team Leader

Date:



1/5/11

Concurrence:



Martin Navarrete, CBFO
Acting Quality Assurance Director

Date:



1-6-11

Processes and Equipment to be Audited During Audit A-11-08 of the ORNL/CCP

WIPP #	Process/Equipment Description	Applicable to the Following Waste Streams/Groups of Waste Streams	Currently Approved by NMED	Currently Approved by EPA
PREVIOUSLY APPROVED PROCESSES OR EQUIPMENT				
Contact-handled (CH) S4000 soils waste and S5000 debris waste				
N/A	Acceptable Knowledge Procedure – CCP-TP-002 and CCP-TP-005	Soils (S4000) Debris (S5000)	YES	YES
16RR1	Real-Time Radiography Mobile Characterization System (MCS) RTR # 6 – 55-gallon drums Procedure – CCP-TP-165 and CCP-TP-053	Soils (S4000) Debris (S5000)	YES	YES
N/A	Headspace Gas Sampling Procedure – CCP-TP-082 and CCP-TP-093	Debris (S5000)	YES	YES
N/A	Data Generation and Project Level Validation & Verification (V&V) Procedure – CCP-TP-001	Soils (S4000) Debris (S5000)	YES	YES
N/A	WIPP Waste Information System (WWIS)/Waste Data System (WDS) Procedure – CCP-TP-030 and CCP-TP-033	Soils (S4000) Debris (S5000)	YES	YES
16IQ1	NDA IQ3 Procedures: CCP-TP-046, <i>CCP Mobile IQ3 System Calibration Procedure</i> CCP-TP-047, <i>CCP Mobile IQ3 Gamma Scanner Operation</i> CCP-TP-048, <i>CCP Mobile IQ3 System Data Reviewing, Validating, and Reporting Procedure</i>	Soils (S4000) Debris (S5000)	N/A	YES

Processes and Equipment to be Audited During Audit A-11-08 of the ORNL/CCP

WIPP #	Process/Equipment Description	Applicable to the Following Waste Streams/Groups of Waste Streams	Currently Approved by NMED	Currently Approved by EPA
16VE1	Visual Examination Procedure: CCP-TP-113, <i>CCP Standard Contact-Handled Waste Visual Examination</i>	Soils (S4000) Debris (S5000)	YES	YES
N/A	Quality Assurance	N/A	N/A	YES
Remote-handled (RH) S5000 debris waste				
N/A	Acceptable Knowledge Procedure – CCP-TP-002, CCP-TP-005, and CCP-TP-506	Debris (S5000)	YES	YES
N/A	Data Generation and Project Level Validation & Verification (V&V) Procedure – CCP-TP-001	Debris (S5000)	YES	YES
N/A	WIPP Waste Information System (WWIS)/Waste Data System (WDS) Procedure – CCP-TP-530	Debris (S5000)	YES	YES
16RHVE1	Visual Examination (VE) Procedure – CCP-TP-163 and CCP-TP-500	Debris (S5000)	YES	YES
16DTC1	Radiological characterization (Dose-to-Curie) Procedure - CCP-TP-504	Debris (S5000)	N/A	YES
N/A	Quality Assurance	N/A	N/A	YES

Processes and Equipment to be Audited During Audit A-11-08 of the ORNL/CCP

WIPP #	Process/Equipment Description	Applicable to the Following Waste Streams/Groups of Waste Streams	Currently Approved by NMED	Currently Approved by EPA
N/A	Headspace Gas Sampling (SUMMA®) Procedure – CCP-TP-082 and CCP-TP-093	Debris (S5000)	N/A	YES
TRANSPORTATION				
16HG2	Flammable Gas Analysis HSG-FGA-04 Procedure: DOE/WIPP-06-3345	Soils (S4000) Debris (S5000)	N/A	YES
DEACTIVATED EQUIPMENT				
16SG1	DWAS/IPAN/SGS-01 CCP-TP-169, <i>CCP Operating the Mobile SGS</i> CCP-TP-172, <i>CCP Calibrating the Mobile Segmented Gamma Scanner</i> CCP-TP-166, <i>CCP DWAS IPAN Operations</i> CCP-TP-167, <i>CCP Drum Waste Assay System Imaging</i> <i>Passive/Active Neutron Calibration</i> CCP-TP-168, <i>CCP DWAS IPAN/SGS Data Generation</i> <i>Level Validation</i>	Soils (S4000) Debris (S5000)	N/A	YES