

Zappe, Steve, NMENV

From: Feltcorn.Ed@epamail.epa.gov
Sent: Thursday, January 27, 2011 7:27 AM
To: Site Documents - DOE
Cc: Generette.Lloyd@epamail.epa.gov; Hall, Timothy, NMENV; Zappe, Steve, NMENV; Joglekar.Rajani@epamail.epa.gov; lcvcompany@comcast.net; david.haar@wipp.ws; courtland.fesmire@wipp.ws; Peake.Tom@epamail.epa.gov; norma.castaneda@wipp.ws; pkelly@scainc.com
Subject: Scope for HE large box RTR Tier 2 eval by EPA Feb 2
Attachments: Scope of SRS-CCP large box HE RTR T2 evaluation Feb 2.pdf



Scope of SRS-CCP
large box HE ...

Please pass to anyone I may have omitted from distrobution.

Thanks
Ed Feltcorn(See attached file: Scope of SRS-CCP large box HE RTR T2 evaluation
Feb 2.pdf)



Scope of EPA's Tier 2 Change Evaluation at SRS-CCP: Real-Time Radiography (RTR)

DOE Site: Savannah River Site – Central Characterization Project (SRS-CCP)

Organizations Notified: Department of Energy – Carlsbad Field Office
New Mexico Environment Department
Environmental Protection Agency – Region 4

Inspection Dates: February 2, 2011

Inspection Schedule: Wednesday 8:00 – 8:30 am kick-off meeting*
Wednesday 8:30 am – 3:00 pm
Wednesday 3:30 pm close-out meeting*

* With SRS-CCP Management and technical leads

EPA Inspection Team: Ed Feltcorn, EPA Inspection Lead, EPA HQ
Rajani Joglekar, EPA Inspector, EPA HQ
Dorothy Gill, Inspector, EPA Contractor (SC&A)

Inspection Scope:

EPA will conduct a Tier 2 evaluation in accordance with 40 CFR 194.8(b) to evaluate the adequacy, implementation, and effectiveness of technical processes implemented by SRS-CCP when using the High Energy Large Box RTR, a real-time radiography (RTR) device for characterizing CH TRU waste containers.

Characterization System Evaluated:

On February 2, 2011, a new RTR system for the CH waste program will be evaluated as a T2 change under the inspection authority described in 40 CFR 194.8(b):

The EPA evaluation of personnel qualifications/training (by review of records and conducting interviews), operating procedures, and tests of equipment to determine regulatory compliance will be performed to assess the adequacy of the system. The SRS-CCP does not require EPA approval prior to implementing the RTR at SRS as a T2 change. If the EPA evaluation finds any significant concerns, EPA may consider the need for SRS-CCP to re-examine containers examined using the subject equipment.

CCP Governing Documents:

- CCP Transuranic Waste Certification Plan, CCP-PO-002
- CCP Transuranic Waste Characterization Quality Assurance Project Plan (QAPjP), CCP-PO-001

Additional Documents:

- CCP Project Level Data Validation and Verification, CCP-TP-001
- CCP Standard Real-Time Radiography (RTR) Inspection Procedure, CCP-TP-053
- CCP Training and Qualification Plan, CCP-QP-002
- CCP-TP-053 CCP Standard Real-Time Radiography (RTR) Inspection Procedure
- CCP-TP-074 CCP Large Container Non-Destructive Examination (LCNDE) Operating Procedure

During the inspection, EPA will require additional documents, such as a list of and/or specific examples of Batch Data Reports (BDRs). EPA requests that these documents be provided prior to or at the 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 Acceptable Knowledge (AK) summary for the waste stream(s) processed in the completed BDRs.

CBFO QA is welcome to provide observers for the EPA inspection.