



Department of Energy
Carlsbad Field Office
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FEB 1 2011

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 Audit Report for the Savannah River Site Central Characterization Project Recertification Audit A-11-01

Dear Mr. Zappe:

This letter transmits the audit report for the Carlsbad Field Office (CBFO) Audit A-11-01 of the Savannah River Site Central Characterization Project processes performed to characterize and certify waste as required by Section II.C.2.c of the Waste Isolation Pilot Plant (WIPP) Hazardous Waste Facility Permit which was in effect at the time the audit was conducted, October 26-28, 2010. The report contains the results of the recertification audit performed for contact-handled Summary Category Groups (SCGs) S3000 homogeneous solids waste, S4000 soils/gravel waste, and S5000 debris waste, and remote-handled SCGs S3000 homogeneous solids waste and S5000 debris waste. The audit team also evaluated, for initial certification, activities related to the real-time radiography Unit 4 to characterize the standard large box 2s (SLB2s) and the Large Container Non-Destructive Examination system to characterize standard waste boxes and SLB2s.

I certify under penalty of law that this document and all enclosures were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.

Should you have any questions, please contact Martin P. Navarrete, CBFO Acting Director of the Office of Quality Assurance, at (575) 234-7483.

Sincerely,

Edward Ziemianski
Acting Manager

Enclosure



Mr. Steve Zappe

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FEB 1 2011

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WIPP Operating Record, MS: 452-09

CTAC QA File

CBFO M&RC

**U.S. DEPARTMENT OF ENERGY
CARLSBAD FIELD OFFICE**

FINAL AUDIT REPORT

OF THE

SAVANNAH RIVER SITE CENTRAL CHARACTERIZATION PROJECT

**AIKEN, SOUTH CAROLINA,
AND CARLSBAD, NEW MEXICO**

AUDIT NUMBER A-11-01

October 26 – 28, 2010

TRU WASTE CHARACTERIZATION AND CERTIFICATION

**FINAL AUDIT REPORT OF WASTE CHARACTERIZATION IN
ACCORDANCE WITH THE HAZARDOUS WASTE FACILITY PERMIT**



Prepared by: Priscilla Y. Martinez Date: 1-26-11
Priscilla Y. Martinez, CTAC
Audit Team Leader

Approved by: Martin Navarrete FOR Date: 1-27-11
Martin Navarrete, CBFO
Acting Director, Office of Quality Assurance

1.0 EXECUTIVE SUMMARY

Carlsbad Field Office (CBFO) recertification Audit A-11-01 was conducted to evaluate the adequacy, implementation, and effectiveness of Savannah River Site (SRS) transuranic (TRU) waste characterization and certification activities performed for SRS by the Washington TRU Solutions, LLC (WTS) Central Characterization Project (CCP) relative to the requirements detailed in the *Waste Isolation Pilot Plant Hazardous Waste Facility Permit (HWFP)*, the *CBFO Quality Assurance Program Document (QAPD)*, and the *Transuranic Waste Acceptance Criteria for the Waste Isolation Pilot Plant (WAC)*.

The audit team evaluated contact-handled (CH) Summary Category Groups (SCGs) S3000 solids waste, S4000 soils/gravel waste, and S5000 debris waste, and remote-handled (RH) SCGs S3000 homogeneous solids waste and S5000 debris waste, in addition to technical and quality assurance (QA) elements.

The audit was conducted at the SRS/CCP facilities near Aiken, SC, and the WTS/CCP facility in Carlsbad, NM, October 26 through 28, 2010. The audit team concluded that overall, the SRS/CCP technical and QA programs, as applicable to audited activities, were adequately established for compliance with the applicable upper-tier requirements. The audit team verified that the SRS/CCP program for characterization and certification activities related to CH SCGs S3000 homogeneous solids waste, S4000 soils/gravel waste, and S5000 debris waste, and RH SCGs S3000 homogeneous solids waste and S5000 debris waste continue to be adequate, satisfactorily implemented, and effective. Initial certification activities related to the real-time radiography (RTR) Unit 4 for characterization of the standard large box 2s (SLB2s) and the Large Container Non-Destructive Examination (LCNDE) system for characterization of the standard waste boxes (SWBs) and SLB2s were determined to be adequate, satisfactorily implemented, and effective.

No Waste Analysis Plan (WAP) deficiencies requiring the issuance of a CBFO corrective action report (CAR) were identified during this audit. The audit team identified one Recommendation that was presented to SRS/CCP management. The Recommendation is described in section 7.2.

2.0 SCOPE

2.1 Scope

The audit team evaluated the continued adequacy, implementation, and effectiveness of the SRS/CCP TRU waste characterization and certification activities as they relate to the WIPP HWFP for CH SCGs S3000 homogeneous solids waste, S4000 soils/gravel waste, and S5000 debris waste, and RH SCGs S3000 homogeneous solids waste and S5000 debris waste. The audit team also evaluated for initial certification the RTR Unit 4 to characterize SLB2s and the LCNDE system to characterize SWBs and SLB2s.

The following elements were evaluated:

Quality Assurance

Personnel Qualification and Training
Nonconformance Reporting
Records

Technical

Data Validation and Verification (V&V) (Project and Generation Level)
Acceptable Knowledge (AK)
Headspace Gas Sampling and Analysis (HSG)
Real-Time-Radiography (RTR)
Solids/Soils Sampling and Analysis
Performance Demonstration Program (PDP)
Visual Examination (VE)
WIPP Waste Information System/Waste Data System (WWIS/WDS)

General

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

The evaluation of SRS/CCP TRU waste activities and documents was based on current revisions of the following documents:

Hazardous Waste Facility Permit, Waste Isolation Pilot Plant EPA No. NM4890139088-TSDF, the New Mexico Environment Department (HWFP)
CBFO Quality Assurance Program Document (QAPD), DOE/CBFO-94-1012
Transuranic Waste Acceptance Criteria for the Waste Isolation Pilot Plant Project (WAC), DOE/WIPP-02-3122
CCP Transuranic Waste Characterization Quality Assurance Project Plan (QAPjP), CCP-PO-001
CCP Transuranic Waste Certification Plan, CCP-PO-002
CCP/SRS Interface Document, CCP-PO-004
Related technical and quality assurance implementing procedures

3.0 AUDIT TEAM AND OBSERVERS

AUDITORS/TECHNICAL SPECIALISTS

Dennis Miehs	Audit Team Management Representative, CBFO
Priscilla Y. Martinez	Audit Team Leader, CBFO Technical Assistance Contractor (CTAC)
Earl Bradford	Auditor, CTAC
Tammy Bowden	Auditor, CTAC
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OBSERVERS

Thomas Morgan	CBFO
Steve Holmes	New Mexico Environment Department (NMED)
Tim Hall	NMED
Ricardo Maestas	NMED
Dorothy Gill	NMED Contractor

4.0 AUDIT PARTICIPANTS

SRS and CCP personnel contacted during the audit are identified in Attachment 1. A pre-audit meeting was held at the SRS in trailer 707-9E, and at the Skeen-Whitlock Building in Carlsbad, NM, on October 26, 2010. Daily briefings were held with SRS and CCP management and staff to discuss issues and potential deficiencies. The audit was concluded with a post-audit meeting held at the SRS in trailer 707-9E and via teleconference with personnel at the Skeen-Whitlock Building on October 28, 2010.

5.0 AUDIT RESULTS

5.1 Program Adequacy, Implementation, and Effectiveness

This audit was performed to assess the ability of SRS/CCP to characterize CH SCGs S3000 homogeneous solids, S4000 soils/gravel, and S5000 debris waste, and RH

SCGs S3000 homogeneous solids and S5000 debris waste to the requirements specified in the CBFO QAPD, the HWFP *Waste Analysis Plan* (WAP), and the WAC. The related characterization methods assessed were AK, HSG Sampling and Analysis, Solids Sampling and Analysis, RTR, and VE. Other areas evaluated were project-level data V&V, data quality objective (DQO) reconciliation, the preparation of Waste Stream Profile Forms (WSPFs), WWIS/WDS data entry, PDP, and associated SRS/CCP QA program elements.

The audit team concluded that the applicable SRS/CCP TRU waste characterization activities, as described in the associated SRS/CCP implementing procedures, are satisfactory in meeting upper-tier requirements, including those associated with the LCNDE system. The LCNDE system activities audited were limited to observing the RTR operations on SWBs. The audit team evaluated LCNDE system operations, standard operating procedures, and training documentation.

Surveillance S-11-10 was conducted November 30 through December 1, 2010, as a follow-up to verify the adequacy, implementation, and effectiveness of the SRS/CCP LCNDE system used for characterizing CH and RH waste in SWBs and SLB2s. The surveillance team reviewed batch data reports (BDRs) and observed associated video/audio media of SLB2s and SWBs being characterized. The surveillance team determined that the SRS/CCP LCNDE activities evaluated were adequate, satisfactorily implemented, and effective. The report for Surveillance S-11-10 was issued on December 10, 2010.

Attachment 1 lists the personnel contacted during the audit. Personnel contacted during the audit, by area, are listed in Attachment 2. Attachment 3 is the objective evidence reviewed during the audit. Details of audit activities, including associated objective evidence reviewed, are described below and in the attached B6 checklists. The B6 checklists identify the SRS/CCP program documents and procedures demonstrating where the HWFP requirements are met. Attachment 4 is a list of SRS/CCP implementing documents for implementation of the appropriate Table B6-1 through B6-6 WAP requirements. Attachment 5 identifies the processes and equipment audited for certification. Attachment 6 identifies and briefly describes revisions to the implementing procedures that have occurred since the last recertification audit (CBFO Audit A-10-01).

5.2 Technical Activities

Each technical area audited is discussed in detail in the following sections. The method used to select objective evidence is given, the objective evidence used to assess compliance with the HWFP is cited briefly (and in detail on the B6 checklists), and the results of the assessment are provided.

Objective evidence was selected and reviewed to evaluate the implementation of the associated characterization and certification activities. BDRs and training documentation for TRU Waste Characterization Program (TWCP) personnel were included in the evaluation. The audit included direct observation, a demonstrated walk-through of waste characterization activities such as HSG sampling and analysis, RTR,

VE, and WWIS/WDS data entry and/or documentation review. Each characterization process involves:

- Collecting raw data
- Collecting QA/QC samples or information
- Reducing the data to a useable format, including a standard report
- Review of the report by the data generation facility and the site project office
- Comparing the data against program DQOs
- Reporting the final waste characterization information to WIPP

Any checklist question that could not be satisfactorily answered would have resulted in an audit deficiency. All items were adequately addressed during the audit.

5.2.1 Table B6-1 WAP Checklist

The B6-1 WAP checklist addresses general program requirements from an overall management perspective. The checklist addresses both technical requirements and QA programmatic requirements that, when collectively implemented, ensure effective overall management of TRU waste characterization and certification activities. Requirements are integrated into controlled documents that ensure the waste characterization strategy defined in the WAP is accomplished and documented in accordance with controlled processes and procedures.

The audit team evaluated both the QA program aspects of the B6-1 checklist and the technical activities defined in the remaining B6 checklists. The following B6-1 checklist items related to QA program implementation were evaluated by the audit team.

- **Personnel Qualification and Training:** The audit team interviewed personnel and examined training and qualification records of personnel performing TRU waste characterization and certification activities to verify that SRS/CCP satisfactorily complies with the applicable requirements of the HWFP. Random selection of records was based on selected BDRs from each of the characterization processes. No concerns were identified.
- **Nonconformance Reporting:** The audit team interviewed personnel and reviewed selected nonconformance reports (NCRs) to verify that SRS/CCP satisfactorily complies with the applicable requirements of the HWFP. Additional reviews were performed to ensure that CCP complies with the Permit requirement for non-administrative WAP-related nonconformances first identified at the site project manager (SPM) level. No concerns were identified.
- **Records:** The audit team interviewed personnel and reviewed selected records generated and associated with TRU waste characterization and certification activities to verify that SRS/CCP satisfactorily complies with the applicable requirements of the HWFP. The audit team verified that CCP has prepared both CH and RH waste Records Inventory and Disposition Schedules (RIDS) for

managing generated records. Records were determined to be appropriately completed, stored, maintained, and transferred in accordance with established retention times. No concerns were identified.

The audit team reviewed objective evidence to ensure project-level activities were adequately performed to support waste characterization. Objective evidence included completed BDRs through CCP SPM review for RTR, HSG sampling and analysis, VE, and solids and soils/gravel sampling and analysis. In addition, procedures and objective evidence were reviewed to ensure that SRS/CCP adequately performs random container selection for HSG, solids and soils/gravel, data reconciliation, and properly prepares WSPFs.

Objective evidence was reviewed to determine the adequacy of the SPM V&V procedures and the reporting of the results of the validation. Evidence included BDRs from each of the waste characterization activities. The flow of data from the point of generation to inclusion in the WSPF for each characterization technique was reviewed to ensure that all applicable requirements were captured in the site operating procedures. The project-level data V&V process was evaluated by reviewing the following BDRs:

RTR

SR4RTR0098, SR4RTR0099, SRSRTR0368

VE

RHSRSVE080001, RHSRSVE080002

HSG Sampling and Analysis

SRHSGS090006, ECL09041G, ECL09041M

Solids and Soils/Gravel Sampling and Analysis

SSC09-00007, ALD09013M, ALD09013N, ALD09013S, ALD09013V

Some of the BDRs reviewed were used to demonstrate confirmation of AK, reconcile DQOs, and prepare WSPFs. WSPFs reviewed were for waste streams SR-MD-HOM-A, SR-MD-PAD1, and SR-MD-SOIL. Also reviewed were the characterization reconciliation reports for Battelle Columbus Laboratory RH waste.

The audit team reviewed quarterly reports of data generation-level requirements for RTR, HSG, and VE. The soils/gravel quarterly results were reviewed previously.

There have been no characterization activities on S4000 soils/gravel waste since Audit A-06-01; however, SRS/CCP maintains the capability to process the waste should additional soils/gravel waste be encountered.

The audit team reviewed the RH WSPF/Characterization Information Summary (WSPF/CIS) for SR-BCLDP.001.002 (S5000) and SR-BCLDP.004.003 (S5000). VE is

the only characterization performed on these waste streams. SRS/CCP submitted Acceptable Knowledge Sufficiency Determinations (AKSDs) for these waste streams.

The audit team also reviewed the CH WSPF/CIS for S4000 (SR-MD-SOIL Lot 1), S3000 (SR-MD-HOM-A Lot 1), and S5000 (SR-MD-PAD1 Lot 1).

The soils/gravel waste stream sampling and analysis for SRS/CCP is performed at the Idaho National Laboratory (INL), using a characterization process approved under a separate certification. There have been no characterization activities on SCG S4000 waste since recertification Audit A-06-01. Solids sampling and analysis of SCG S3000 waste was performed at the INL. Project-level review of solids sampling and analysis was determined to be adequate, satisfactorily implemented, and effective.

The CCP procedures governing HSG sampling using SUMMA[®] canisters and data review and validation included CCP-TP-093, Rev. 13, *CCP Sampling of TRU Waste Containers*, and CCP-TP-106, Rev. 6, *CCP Headspace Gas Sampling Batch Data Report Preparation*.

Currently, SRS/CCP performs HSG sampling using SUMMA[®] canisters. HSG sampling analysis is performed by at INL and is assessed separately. Sampling BDR SRHSGS090006 for S5000 debris waste was examined. Drum age criteria (DAC), sample chain-of-custody (COC), and shipment to the analytical laboratory were reviewed and determined to be compliant. The results of HSG analysis for SUMMA[®] samples were reviewed by the audit team, as well as the training and qualification of V&V personnel.

The SRS/CCP RTR and VE project-level processes were evaluated to determine the effectiveness of RTR and VE methods. The audit team reviewed BDRs SR4RTR0098, SR4RTR0099, and SRSRTR0368. The RH portion of the audit consisted of reviewing the procedures and the SCG S3000 and SCG S5000 containers in BDRs RHSRSVE080001 and RHSRSVE080002. No concerns were identified.

The audit team examined PDP documentation and interviewed SRS/CCP PDP personnel to verify that PDP activities were performed as required by established procedures and that the results were approved by CBFO. SRS/CCP had discontinued participation in the PDP for HSG since the analyses are now performed at INL. The soils/gravel analyses are also being performed at INL.

5.2.2 Table B6-2 Solids and Soils/Gravel Sampling Checklist

This audit was performed to assess the capability of SRS/CCP to characterize SCGs S3000, S4000, and S5000 waste streams for compliance with the HWFP. There have been no characterization activities on SCG S4000 waste since recertification audit CBFO Audit A-06-01.

Solids sampling and analysis and associated data generation-level V&V are performed at INL under a separate certified program. However, the audit team did evaluate the

random selection requirements for solids sampling, along with the associated BDRs. Additionally, the audit team evaluated the results of the analysis provided to SRS/CCP as part of the project-level data V&V evaluations. No concerns were identified.

5.2.3 Table B6-3 Acceptable Knowledge Checklist

The audit team reviewed AK documentation for all three CH TRU waste SCGs S3000, S4000, and S5000 and RH TRU waste SCGs S3000 and S5000. The audit team utilized the WAP B6 checklists, primarily checklist B6-3, as a guide for demonstration of compliance with the requirements of the WAP.

The audit team examined the AK records for five waste streams representing the five types of waste noted above including SR-MD-PAD1 CH debris, SR-MD-SOIL, SR-MD-HOM-A, a CH solids stream, SR-BCLDP.001.001 RH Homogeneous Waste and SR-BCLDP.001.002 RH Composite Filter Debris Waste described in AK Summaries CCP-AK-SRS-8, Rev. 6 (for SR-MD-HOM-A and SR-MD-SOIL), CCP-AK-SRS-9, Rev. 2 (for SR-MD-PAD 1), and CCP-AK-SRS-510, Rev. 2 (for SR-BCLDP.001.001 and SR-BCLDP.001.002).

Numerous documents that demonstrate compliance with these requirements were reviewed and compiled as objective evidence, including the above-noted AK Summary Reports and AK Attachments 1, 4, 5, 6, 7 and 8. The audit team also examined applicable WSPFs and attachments, numerous AK Source Document Summaries, and BDRs for the required characterization testing activities including RTR, VE, Solids/Soils, and HSG sampling and analysis. For the two RH-TRU streams examined, CCP has received approval from CBFO and NMED of the AKSDs submitted in lieu of HSG and solids sampling and analysis. Numerous examples of AK discrepancy resolution documentation for discrepancies in the AK record and for discrepancies identified during characterization activities were also examined, along with NCRs dealing with the identification and disposition of prohibited items.

The permit-required traceability exercise was completed for nine waste containers from the five streams reviewed, including containers selected for either HSG or solids sampling and analysis. Random container selection memos were reviewed, along with applicable BDRs and HSG and Solids Summary Reports. AK data reconciliation packages, including the requisite AK Characterization Checklists, were examined for shipping lots from each waste stream. The audit team also reviewed examples from the databases used to manage the movement of drums through the characterization and certification process, and examined the process for physically and electronically placing a "hold" on non-compliant waste containers. Other objective evidence reviewed and compiled included the applicable AK Accuracy Reports, training records for AK and SPM personnel, and a copy of the most recent and relevant internal surveillance.

The review resulted in one concern that included changes be made to each of the three AK Summaries reviewed to provide clarification and consistency (see Recommendation 1 in section 7.2).

Overall, the Acceptable Knowledge Program was determined to be adequate, satisfactorily implemented, and effective.

5.2.4 Table B6-4 Headspace Gas Checklist

The audit team conducted interviews and examined related records in the area of SRS/CCP HSG sampling activities. SRS/CCP performs HSG sampling using SUMMA® canisters for sample collection. Samples are then shipped to INL for analysis.

The audit team reviewed sampling BDRs SRHSGS090006, SRHSGS100001, and SRHSGS100002 for debris waste. DAC, operational logbooks, sample COC, and transfer to the analytical laboratory were reviewed and found to be compliant. Material and testing equipment (M&TE) certifications were audited. Training and qualification of sampling individuals were confirmed to be acceptable to the CCP program. Interviews were conducted with sampling personnel. There were no TRU waste sampling activities during the audit. No concerns were identified.

Overall, the HSG sampling activities were determined to be adequate, satisfactorily implemented, and effective.

5.2.5 Table B6-5 Radiography Checklist

The audit team reviewed the following RTR-related CCP procedures: CCP-QP-011, Rev. 10, *CCP Laboratory Logbooks*; CCP-TP-028, Rev. 5, *CCP Radiographic Test and Training Drum Construction*; CCP-TP-053, Revs. 8 and 9, *CCP Standard Real-Time Radiography (RTR) Inspection Procedure*; CCP-QP-002, Rev. 29, *CCP Training and Qualification Plan*; CCP-TP-074, Revs. 0 and 1, *CCP Large Container Non-Destructive Examination (LCNDE) Operating Procedure*; CCP-TP-145, Rev. 2, *CCP RTR #4 Operating Procedure*; CCP-TP-066, Rev. 10, *CCP Radiography Screening Procedure for Prohibited Items*; CCP-TP-136, Rev. 2, *CCP Standardized Prohibited Item Remediation*; and CCP-QP-016, Rev. 15, *CCP Control of Measuring and Testing Equipment*. The review determined that the procedures adequately address requirements from upper-tier documents.

The audit team examined the following five RTR BDRs and their associated video recordings:

SR4RTR0110
SR4RTR0112
SR4RTR0105
SRSRTR0365
SR4RTR0107

The audit team evaluated evidence of RTR operator-required capability demonstrations for five RTR operators. Records of RTR operator training and qualification were examined, including capability demonstrations, which indicated that operators were appropriately qualified as required.

The audit team toured Cell 2 and observed operation of the LCNDE system. System operation was demonstrated for the audit team using a SWB. The audit team toured Pad 4, Area E, to observe operation of RTR Unit 4. The team witnessed the certification of SWB Container Number WMAPSWB308. The team also observed SRS Unit 15, which was not in use at the time of the audit. During the walk-through, the audit team verified the acceptability of equipment. The audit team verified RTR operations were performed to current procedures, interviewed RTR personnel, and reviewed operational logbooks and standing work orders.

The audit team was unable to review BDRs from the LCNDE at the time of the audit. Surveillance S-11-10 was conducted November 30 through December 1, 2010 as a follow-up, to verify the adequacy, implementation, and effectiveness of the SRS/CCP LCNDE System used for characterizing contact-handled and remote-handled waste in SWBs and SLB2s. The surveillance team reviewed batch data reports (BDRs) and observed associated video/audio media. The surveillance team determined that the SRS/CCP LCNDE activities evaluated were adequate, satisfactorily implemented, and effective. No concerns were identified.

Overall, RTR activities were determined to be adequate, satisfactorily implemented, and effective.

5.2.6 Table B6-6 Visual Examination Checklist

The audit team evaluated the adequacy, implementation, and effectiveness of the SRS/CCP VE process for characterizing CH SCGs S4000 soils/gravel waste and S5000 debris waste. The audit team also evaluated the adequacy, implementation, and effectiveness of the SRS/CCP VE process for characterizing RH SCGs S3000 homogeneous solids waste and S5000 debris waste.

The audit team evaluated procedures CCP-TP-113, Rev. 14, *CCP Standard Contact-Handled Waste Visual Examination*; CCP-TP-163, Rev. 2, *CCP Evaluation of Waste Packaging Records for Visual Examination of Records*; CCP-TP-500, Rev. 9, *CCP Remote-Handled Waste Visual Examination*; and CCP-QP-002, Rev. 29, *CCP Training and Qualification Plan*, to determine their adequacy in addressing upper-tier requirements. The review determined that the procedures adequately address requirements.

SRS/CCP uses the two-operator method when performing VE characterization activities for CH waste. Two qualified operators visually examine the waste and placed it into 55-gallon drums. No RH waste has been characterized using the VE processes, as stipulated in procedures CCP-TP-163 and CCP-TP-500, since the last certification audit.

The audit team examined the following CH VE BDRs to verify implementation and compliance with the requirements for documenting VE activities, as stipulated in CCP-TP-113:

SRVEFW0303
SRVEFW0307
SRVEFW0310
SRVEFW0290
SRVEFW0294
SRVEFW0295

During review of the BDRs, the audit team verified TRUPACT-II content (TRUCON) codes matched those documented in the AK summaries, and examined associated NCRs and verified disposition status to completion. In addition, the audit team reviewed NCRs in which the waste did not match the waste stream description produced by AK and verified AK Discrepancy Resolutions had been completed.

The audit team examined training and qualification records for three VE operators and one SPM and concluded the required training was adequate and qualifications were current. The audit team also confirmed the appointment of an SRS/CCP VE Expert (VEE), as required.

The audit team performed a walk-through of the F-Canyon facility, Building 221-F, where VE of CH waste is performed and where the containers are weighed after the VE process is complete. Container weight scale TRUF020, torque wrench TRUF045, and calibration weights TRUF048, TRUF028, and SW0007-33 were verified to be within calibration requirements and in the CCP M&TE maintenance program. The audit team interviewed a VE operator/VEE for CH VE operations, and a VE operator/VEE for RH VE operations, and verified the use of current AK summaries and VE operating procedures. The audit team also examined VE operational logbook SRSVE013, 2010 – SRS F Area Warm Crane, and verified logbook entries were reviewed by the Vendor Project Manager (VPM). No concerns were identified.

Overall, VE activities were determined to be adequate, satisfactorily implemented, and effective.

5.2.7 General

Results of Previous Audits

The results of CBFO Recertification Audit A-10-01 of SRS/CCP were examined and the audit team determined that the concerns identified in the audit have been addressed.

Changes in Programs or Operations

Six AKSDs were evaluated and approved by NMED and the EPA since the last audit.

The following six RH waste streams resulted from the demolition of the alpha gamma hot cell in Building JN-1 at Battelle Columbus Laboratory (BCL):

SR-BCLDP.001.001, S3000 homogeneous waste (five drums)
SR-BCLDP.001.002, S5000 composite filter debris (four drums)
SR-BCLDP.002, S3000 cemented slugs (one drum)
SR-BCLDP.003, S3000 hydraulic sludge and debris (seven 55-gallon drums)
SR-BCLDP.004.002, S5000 cartridge water filters (five drums)
SR-BCLDP.004.003, S5000 Tri-Nuc vacuum filters (two drums)

New Programs or Activities Being Implemented

New activities being implemented at SRS/CCP are the initial certification of RTR Unit 4 to characterize SLB2s and the LCNDE system to characterize SWBs and SLB2s.

Changes in Key Personnel

No changes in key personnel have been made since the performance of Audit A-10-01.

6.0 SUMMARY OF DEFICIENCIES

6.1 Corrective Action Reports

During the audit, the audit team may identify conditions adverse to quality (CAQs) and document them on corrective action reports (CARs).

Condition Adverse to Quality (CAQ) – Term used in reference to failures, malfunctions, deficiencies, defective items, and nonconformances.

Significant Condition Adverse to Quality – A condition which, if uncorrected, could have a serious effect on safety, operability, waste confinement, TRU waste site certification, compliance demonstration, or the effective implementation of the QA program.

There were no HWFP/WAP-related conditions adverse to quality necessitating the generation of a CAR during this audit.

6.2 Deficiencies Corrected During the Audit

During the audit, the audit team may identify CAQs. The audit team members and the Audit Team Leader (ATL) evaluate the CAQs to determine if they are significant.

CAQ – Term used in reference to failures, malfunctions, deficiencies, defective items, and nonconformances.

Significant CAQ – A condition which, if uncorrected, could have a serious effect on safety, operability, waste confinement, TRU waste site certification, compliance demonstration, or the effective implementation of the QA program.

Once a determination is made that the CAQ is not significant, the audit team member, in conjunction with the ATL, determines if the CAQ is an isolated case requiring only remedial action and therefore can be corrected during the audit. Upon determination that the CAQ is isolated, the audit team member, in conjunction with the ATL, evaluates/verifies any objective evidence/actions submitted or taken by the audited organization and determines if the condition was corrected in an acceptable manner. Once it has been determined that the CAQ has been corrected, the ATL categorizes the condition as a CDA according to the definition below.

CDAs – Isolated deficiencies that do not require a root cause determination or actions to preclude recurrence. Correction of the deficiency can be verified prior to the end of the audit. Examples include one or two minor changes required to correct a procedure (isolated), one or two forms not signed or not dated (isolated), and one or two individuals that have not completed a reading assignment.

No CDAs were identified during the audit.

7.0 SUMMARY OF OBSERVATIONS AND RECOMMENDATIONS

During the audit, the audit team may identify potential problems or suggestions for improvement that should be communicated to the audited organization. The audit team members, in conjunction with the ATL, evaluate these conditions and classify them as Observations or Recommendations using the following definitions:

Observation – A condition that, if not controlled, could result in a CAQ.

Recommendation – A suggestions that is directed toward identifying opportunities for improvement and enhancing methods of implementing requirements.

Once a determination is made, the audit team member, in conjunction with the ATL, categorizes the condition appropriately.

7.1 Observation

No Observations were identified during the audit.

7.2 Recommendation

The audit team presented one Recommendation to SRS/CCP for management consideration.

Recommendation 1

The audit team recommended that changes be made to the three AK Summary Reports (CCP-AK-SRS-008, CCP-AK-SRS-009, and CCP-AK-SRS-510) reviewed during the audit for the purposes of clarity and consistency. The recommended changes are not data-quality affecting.

8.0 LIST OF ATTACHMENTS

- Attachment 1: Personnel Contacted During the Audit
- Attachment 2: Personnel Contacted During the Audit by Area
- Attachment 3: Objective Evidence
- Attachment 4: Listing of Audited Documents
- Attachment 5: Processes and Equipment Evaluated During CBFO Audit A-11-01
- Attachment 6: Procedures Matrix

Personnel Contacted During the Audit

PERSONNEL CONTACTED DURING AUDIT A-11-01				
NAME	TITLE/ORG	PREAUDIT MEETING	CONTACTED DURING AUDIT	POST AUDIT MEETING
Adams, James	VEE;NFT/CCP	X	X	
Almanza, Christian	CCP NDA;WTS/CCP	X	X	
Anaye, Edward	MLU;CCP		X	
Beeler, Dewitt	FM SWMF; SRNS	X		
Billett, Michele	Training Coordinator; CCP Training		X	
Blackwell, Denise	Records Analyst;SRS/CCP	X	X	
Cannon, Val	CCP QA Manager; WTS/CCP	X	X	
Cantu, Adela	CCP SPM;WTS/CCP		X	X
Carlson, Tim	NDA;MCS		X	
Crapse, Bert	TRU Waste Program Mgr.; DOE SR	X		
Davis, Will	NFT/Container Management;CCP		X	
Fisher, A J	CCP Senior Technical Advisor;CCP	X	X	X
Fussel, Buddy	SRS/CCP VPM;SRS/CCP	X	X	X
Gelderman, Byron	RTR Operator;MCS/CCP		X	
Gilmour, John	Director SWM;SRNS	X		X
Gomez, Chris	NCR/CCP Quality Assurance;CCP QA	X	X	X
Harrison, Jeff	AKE;CCP/TECH SPECS		X	
Harvill, Joe	NDA & DTC Lead;WTS/CCP	X	X	
Hasty, Jeff	Solid Waste;SRWS	X		X

PERSONNEL CONTACTED DURING AUDIT A-11-01				
NAME	TITLE/ORG	PREAUDIT MEETING	CONTACTED DURING AUDIT	POST AUDIT MEETING
Hinojos, Felicia	CCP Document Services Manager;CCP		X	
Huff, Andrea	RTR Operator;MCS/CCP		X	
Johnson, Natalia	Chemist/FGA Operator; SRS/CCP		X	
Kirkes, Creta	RCT/WCO/WCA; WTS/CCP		X	
Martin, Ryan	Records Analyst;CCP Training		X	
McCoy, David	RTR Lead Operator; MCS/CCP	X	X	X
Miles, Shane	CCP VPM; CCP	X	X	
Morgan, Tom	DOE CCP Manager;DOE/CBFO	X	X	X
Muse, Steve	CCP Quality Assurance Engineer; WTS/CCP	X	X	
Papp, Michael	AKE;Tech Specs/CCP		X	
Pearcy, Mark	SPM;WTS/CCP	X	X	X
Pearcy, Sheila	CCP Records Manager; CCP Records/Stoller	X	X	X
Pennala, Eric	MCS GM; MCS			X
Peters, Kevin	AKE;Tech Specs/CCP		X	
Ploetz, D.K.	CCP Manager; WTS/CCP	X		
Porter, Larry	CCP Training Manager;CCP Training	X	X	X
Punchios, Sheri	CCP Records Clerk;CCP Records/Stoller		X	
Quintana, Irene	SPM;WTS/CCP	X	X	X
Ramirez, Mike	WCO; WTS/CCP		X	
Remington, Dan	NDA/Lead Operator;MCS		X	
Rigby, Brandon	CCP/MLU/TCO;CCP		X	

PERSONNEL CONTACTED DURING AUDIT A-11-01				
NAME	TITLE/ORG	PREAUDIT MEETING	CONTACTED DURING AUDIT	POST AUDIT MEETING
Schoen, Jim	AKE;Tech Specs/CCP		X	
Sensibaugh, Michael	SRS/CCP Project Manager; WTS/CCP	X	X	X
Shepley, Todd	NDA Lead Operator;CCP/MCS	X	X	X
Simmons, Craig	SRS/CCP SPM; WTS/CCP	X	X	X
Simmons, J. Michael	DOE-SR;Solid Waste Team Lead			X
Stepzinski, Joe	SRS VPM;CCP		X	
Thompson, Joel	FGA/HSG Operator/ITR; NFT/CCP	X	X	X
Valdez, Larry	NDA;MCS		X	
Villanueva, Moe	Oversight; DOE	X		
Wade, Louis	CCP QA;WTS/CCP	X	X	X
Watson, Lisa	AKE;LANL-CO	X	X	
Watson, Ronald	DTC;MCS		X	
Wilson, Jay	SW PM;SRNS	X		
Wooldridge, F. D.	Shipping Coordinator; SRNS/MLU;CCP		X	
Wachter, Joe	MCS/Tech Dir; MCS	X	X	

Personnel Contacted During the Audit by Area

Nonconformances	Chris Gomez Steve Muse Val Cannon
Training	Michele Billett Larry Porter
Records	Denise Blackwell AJ Fisher Ryan Martin Sheila Percy Sheri Punchios
Acceptable Knowledge	Jeff Harrison Michael Papp Kevin Peters Jim Schoen Craig Simmons Lisa Watson
Headspace Gas	Buddy Fussel Craig Simmons Joel Thompson
Real-Time Radiography	Byron Gelderman Andrea Huff David McCoy Michael Sensibaugh
Visual Examination	James Adams Shane Miles
WIPP Waste Information System/Waste Data System (WWIS/WDS)	Creta Kirkes Craig Simmons
Waste Certification/Project Level Validation & Verification	Adela Cantu Irene Quintana Craig Simmons

Objective Evidence

The objective evidence supporting Audit A-11-01 is included in the box(s) submitted with this report. Included in the box(s) is a "Content Map" describing the location (using color coding) and identity of all required objective evidence supporting the performance of the audit.

LISTING OF AUDITED DOCUMENTS

	Document No.	Rev.	Document Title
1.	CCP-PO-001	18	CCP Transuranic Waste Characterization Quality Assurance Project Plan
2.	CCP-PO-002	24	CCP Transuranic Waste Certification Plan
3.	CCP-PO-004	27	CCP/SRS Interface Document
4.	CCP-PO-005	21	CCP Conduct of Operations
5.	CCP-PO-006	3	CCP Conduct of Operations Matrix
6.	CCP-QP-002	29	CCP Training and Qualification Plan
7.	CCP-QP-005	18-19	CCP TRU Nonconforming Item Reporting and Control
8.	CCP-QP-008	16	CCP Records Management
9.	CCP-QP-011	10	CCP Laboratory Logbooks
10.	CCP-QP-016	15	CCP Control of Measuring and Testing Equipment
11.	CCP-QP-021	7	CCP Surveillance Program
12.	CCP-QP-028	11	CCP Records Filing, Inventorying, Scheduling, and Dispositioning
13.	CCP-TP-001	18	CCP Project Level Data Validation and Verification
14.	CCP-TP-002	22	CCP Reconciliation of DQOs and Reporting Characterization Data
15.	CCP-TP-003	17	CCP Data Analysis for S3000, S4000, and S5000 Characterization
16.	CCP-TP-005	19	CCP Acceptable Knowledge Documentation
17.	CCP-TP-028	5	CCP Radiographic Test and Training Drum Requirements
18.	CCP-TP-030	28	CCP TRU Waste Certification and WWIS/WDS Data Entry
19.	CCP-TP-033	17	CCP Shipping of CH TRU Waste
20.	CCP-TP-035	23	CCP Container Management
21.	CCP-TP-053	8-9	CCP Standard Real-Time Radiography (RTR) Inspection Procedure
22.	CCP-TP-056	4	CCP-HSG-Performance Demonstration Program
23.	CCP-TP-066	10	CCP Radiography Screening Procedure for Prohibited Items
24.	CCP-TP-074	0-1	CCP Large Container Non-Destructive Examination (LCNDE) Operating Procedure
25.	CCP-TP-082	7	CCP Preparing and Handling Waste Containers for HSG Sampling
26.	CCP-TP-087	5	CCP Scale Operations
27.	CCP-TP-093	13	CCP Sampling of TRU Waste Containers
28.	CCP-TP-098	3	CCP Installation of the NucFil Headspace Sample Port
29.	CCP-TP-106	6	CCP Headspace Gas Sampling Batch Data Report Preparation
30.	CCP-TP-113	14	CCP Standard Contact-Handled Waste Visual Examination
31.	CCP-TP-120	14	CCP Container Management
32.	CCP-TP-136	2	CCP Standardized Prohibited Item Remediation
33.	CCP-TP-145	2	CCP RTR#4 Operating Procedure
34.	CCP-TP-162	0	CCP Random Selection of Containers for Solids and Headspace Gas Sampling and Analysis
35.	CCP-TP-163	2	CCP Evaluation of Waste Packaging Records for Standard Visual Examination of Records
36.	CCP-TP-180	1	CCP Analytical Sample Management
37.	CCP-TP-500	9	CCP Remote-Handled Waste Visual Examination

LISTING OF AUDITED DOCUMENTS

	Document No.	Rev.	Document Title
38.	CCP-TP-530	9	CCP RH TRU Waste Certification and WWIS/WDS Data Entry
39.	WP 13-QA.03	17	Quality Assurance Independent Assessment Program

Processes and Equipment Evaluated During Audit A-11-01

WIPP #	Process/Equipment Description	Applicable to the Following Waste Streams/Groups of Waste Streams	Currently Approved by NMED
NEW PROCESSES OR EQUIPMENT			
1RR4	Real-time Radiography Procedure – CCP-TP-053 and CCP-TP-145 Description – RTR-4 Standard large box 2s (SLB2s) – (initial certification is for the characterization of SLB2s)	Solids (S3000) Soils/Gravel (S4000) Debris (S5000)	YES
TBD	Real-time Radiography Procedure – CCP-TP-053 and CCP-TP-074 Description – Large Container Non-Destructive Examination (LCNDE) Unit – standard waste boxes (SWBs) and SLB2s	Solids (S3000) Soils/Gravel (S4000) Debris (S5000)	NO
PREVIOUSLY APPROVED PROCESSES OR EQUIPMENT			
1RR3	Real-time Radiography Procedure – CCP-TP-053 Description – RTR-15, 55-gallon drums (PAD 4)	Solids (S3000) Soils/Gravel (S4000) Debris (S5000)	YES
1RR4	Real-time Radiography Procedure – CCP-TP-053 and CCP-TP-145 Description – RTR-4, 55-gallon drums and standard waste boxes (SWBs)	Solids (S3000) Soils/Gravel (S4000) Debris (S5000)	YES
1RHVE1	Visual Examination Procedure – CCP-TP-500 Description – Visual Examination Technique (VET) (video/audio)	Solids (S3000) Soils/Gravel (S4000) Debris (S5000)	YES
VISUAL	Visual Examination Procedure – CCP-TP-113 Description – VE QC Check for RTR, VE in lieu of RTR, VE Technique for Retrievably Stored Waste	Solids (S3000) Soils/Gravel (S4000) Debris (S5000)	YES

WIPP #	Process/Equipment Description	Applicable to the Following Waste Streams/Groups of Waste Streams	Currently Approved by NMED
N/A	Headspace Gas Sampling Procedure – CCP-TP-093 Description – CCP Sampling of TRU Waste Containers using SUMMA® Canisters	Solids (S3000) Soils/Gravel (S4000) Debris (S5000)	YES
N/A	Acceptable Knowledge (AK)	Solids (S3000) Soils/Gravel (S4000) Debris (S5000)	YES
N/A	Data Generation and Project Level Validation and Verification (V&V)	Solids (S3000) Soils/Gravel (S4000) Debris (S5000)	YES
N/A	WIPP Waste Information System/Waste Data System (WWIS/WDS)	Solids (S3000) Soils/Gravel (S4000) Debris (S5000)	YES

PROCEDURE REVISION MATRIX

SRS/CCP Annual Audit A-11-01

Previous SRS/CCP Annual Audit A-10-01

No	Procedure Number	Procedure Title	Revision During Last Annual Audit	Revision During Current Annual Audit	Brief Description of Procedure Changes
1	CCP-PO-001	CCP Transuranic Waste Characterization Quality Assurance Project Plan	17	18	18 - Revised to incorporate modifications to the Hazardous Waste Facility Permit. To make editorial changes that are needed and to change the Waste Isolation Pilot Plant (WIPP), Waste Information System (WWIS) to WWIS/Waste Data System (WDS).
2	CCP-PO-002	CCP Transuranic Waste Certification Plan	21	24	<p>22 – Revised to incorporate Revision 6.4 of DOE/WIPP-02-3122, <i>Transuranic Waste Acceptance Criteria for the Waste Isolation Pilot Plant</i>.</p> <p>23 - Revised to add Hanford Non-Destructive Assay (NDA) equipment.</p> <p>24 – Revised to incorporate Revision 6.5 of DOE/WIPP-02-3122, <i>Transuranic Waste Acceptance Criteria for the Waste Isolation Pilot Plant</i>.</p>
3	CCP-PO-004	CCP/SRS Interface Document	27	27	N/A

PROCEDURE REVISION MATRIX

SRS/CCP Annual Audit A-11-01

Previous SRS/CCP Annual Audit A-10-01

No	Procedure Number	Procedure Title	Revision During Last Annual Audit	Revision During Current Annual Audit	Brief Description of Procedure Changes
4	CCP-PO-005	CCP Conduct of Operations	20	21	21 – Revised in response to Corrective Action Report (CAR)-CCP-0012-09. Also moved the controls for Lessons Learned to Section 6.2, and changed the scope of Section 12.0 to address operational logbooks exclusively.
5	CCP-PO-006	CCP Conduct of Operations Matrix	3	3	N/A
6	CCP-QP-002	CCP Training and Qualification Plan	27	29	<p>28 – Revised to address Corrective Action Report (CAR)-CCP-0012-09, to clarify Acceptable Knowledge (AK) briefings, training for solids lab, and approval process for training material. References to Central Characterization Project (CCP) Program Manager/Project Manager were removed and the responsibilities assigned to the Lead Site Project Manager and CCP Manager responsible for Training.</p> <p>29 - Revised to incorporate changes into Attachment 4, CCP Test Drum Data Sheet for Contact-Handled Waste, and other minor editorial changes.</p>

PROCEDURE REVISION MATRIX

SRS/CCP Annual Audit A-11-01

Previous SRS/CCP Annual Audit A-10-01

No	Procedure Number	Procedure Title	Revision During Last Annual Audit	Revision During Current Annual Audit	Brief Description of Procedure Changes
7	CCP-QP-005	CCP TRU Nonconforming Item Reporting and Control	18	18-19	19 - Revised to: clarify hold tag application; Carlsbad Field Office (CBFO) notification requirements including responsibility, incorporate CCP-SO-054, 1 and CCP-SO-065, 0; revisions to Attachment 1, CCP Nonconformance Report (NCR); and other minor editorial changes.
8	CCP-QP-008	CCP Records Management	14	16	15 – Revised to make personnel title changes and name changes to organizations. Added section 4.7.1[G] for lost records as well as a section for receipt and handling of Official Use Only (OUO) and Unclassified Controlled Nuclear (UCN) documents. 16 – Revised to clarify and address the submittal of historical source documents.
9	CCP-QP-011	CCP Laboratory Logbooks	9	10	10 – Revised in response to Central Characterization Project (CCP) Corrective Action Report (CAR) CAR-CCP-0012-09, to clarify document scope for Waste Analysis Plan (WAP) Laboratory Logbook use.

PROCEDURE REVISION MATRIX

SRS/CCP Annual Audit A-11-01

Previous SRS/CCP Annual Audit A-10-01

No	Procedure Number	Procedure Title	Revision During Last Annual Audit	Revision During Current Annual Audit	Brief Description of Procedure Changes
10	CCP-QP-016	CCP Control of Measuring, Testing, and Data Collection Equipment	14	15	15 - Revised to clarify responsibilities for providing calibration documentation to the measuring and test equipment (M&TE) Custodian.
11	CCP-QP-021	CCP Surveillance Program	6	7	7 - General revision to clarify follow-up to observations and provide clarity of text.
12	CCP-QP-028	CCP Records Filing Inventorying, Scheduling, and Dispositioning	9	11	10 – Revised to incorporate changes to Attachment 2, Instructions for Filling Out the Records Inventory and Disposition Schedule. 11 - Revised to bring instructions regarding location in Attachment 4, Instructions for Filling Out the Records Inventory and Disposition Schedule, in line with current practice.
13	CCP-TP-001	CCP Project Level Data Validation and Verification	7	18	18 - Revised to address Hazardous Waste Facility Permit modification, and other editorial and freeze file changes.
14	CCP-TP-002	CCP Reconciliation of DQOs and Reporting Characterization Data	21	22	22 - Revised for Class 2 Modification Request WIPP Hazardous Waste Facility Permit EPA I.D. Number NM4890139088.

PROCEDURE REVISION MATRIX

SRS/CCP Annual Audit A-11-01

Previous SRS/CCP Annual Audit A-10-01

No	Procedure Number	Procedure Title	Revision During Last Annual Audit	Revision During Current Annual Audit	Brief Description of Procedure Changes
15	CCP-TP-003	CCP Data Analysis for S3000, S4000, and S5000 Characterization	16	17	17 - Revised to delete a reference that is no longer applicable and add the new reference. Also to update attachments and correct editorial errors.
16	CCP-TP-005	CCP Acceptable Knowledge Documentation	18	19	19 - Revised document to address the Waste Isolation Pilot Plant (WIPP) Form WF09-171 from an internal Central Characterization Project (CCP) audit and to incorporate minor editorial changes and technical clarifications noted as a result of various Acceptable Knowledge audits.
17	CCP-TP-028	CCP Radiographic Test and Training Drum Requirements	3	5	4 – Revised to clarify the difference between a Test Drum and a Training Drum and how they are to be constructed. 5 – Revised to correct editorial errors.
18	CCP-TP-030	CCP CH TRU Waste Certification and WWIS Data Entry	26	28	27 – Revised to allow use of the Waste Data System (WDS). 28 – Revised to include steps for direct load 100-Gallon drums that require characterization prior to placement in a direct load Standard Waste Box (SWB) and for minor editorial changes.

PROCEDURE REVISION MATRIX

SRS/CCP Annual Audit A-11-01

Previous SRS/CCP Annual Audit A-10-01

No	Procedure Number	Procedure Title	Revision During Last Annual Audit	Revision During Current Annual Audit	Brief Description of Procedure Changes
19	CCP-TP-033	CCP Shipping of CH TRU Waste	15	17	16 - Revised to incorporate Waste Data System (WDS) operations. Editorial changes were also made. 17 - Revised to align procedure with modifications made to the WDS system, and editorial corrections.
20	CCP-TP-035	CCP Container Management	22	23	23 – Revised in response to Corrective Action Report (CAR)-Los Alamos National Laboratory (LANL)-0006-09.
21	CCP-TP-053	CCP Standard Real – Time Radiography (RTR) Inspection Procedure	6 - 7	8 - 9	8 - Revised to incorporate April 1, 2010, modification of the Waste Isolation Pilot Plant Hazardous Waste Facility Permit (HWFP). 9 - Revised to incorporate another test image type.
22	CCP-TP-056	CCP HSG Performance Demonstration Plan	4	4	N/A
23	CCP-TP-066	CCP Radiography Screening procedure for Prohibited Items	10	10	N/A
24	CCP-TP-082	CCP Preparing and Handling Waste Containers for Headspace Gas Sampling	7	7	N/A
25	CCP-TP-087	CCP Scale Operations	5	5	N/A

PROCEDURE REVISION MATRIX

SRS/CCP Annual Audit A-11-01

Previous SRS/CCP Annual Audit A-10-01

No	Procedure Number	Procedure Title	Revision During Last Annual Audit	Revision During Current Annual Audit	Brief Description of Procedure Changes
26	CCP-TP-093	CCP Sampling of TRU Waste Containers	13	13	N/A
27	CCP-TP-098	CCP Installation of the Nufil HSG Sample Port	3	3	N/A
28	CCP-TP-106	CCP Headspace Gas Sampling Batch Data Report Preparation	6	6	N/A
29	CCP-TP-113	CCP Standard Contact-Handled Waste Visual Examination	13	14	14 - Revised to incorporate modifications to Hazardous Waste Facility Permit. Revised to address CBFO Corrective Action Report (CAR) 10-019. Revised to address procedural steps, to accommodate the visual examination (VE) process for newly generated waste and to make additional editorial changes.
30	CCP-TP-120	CCP Container Management	13	14	14 – Revised in response to Corrective Action Report (CAR)-Los Alamos National Laboratory (LANL)-0006-09 and to clarify when a waste container must be put through container management.
31	CCP-TP-136	CCP Standardized Prohibited Item Remediation	2	2	N/A
32	CCP-TP-145	CCP RTR#4 Operating Procedure	2	2	N/A

PROCEDURE REVISION MATRIX

SRS/CCP Annual Audit A-11-01

Previous SRS/CCP Annual Audit A-10-01

No	Procedure Number	Procedure Title	Revision During Last Annual Audit	Revision During Current Annual Audit	Brief Description of Procedure Changes
33	CCP-TP-162	CCP Random Selection of Containers for Solids and Headspace Gas Sampling and Analysis	0	0	N/A
34	CCP-TP-163	CCP Evaluation of Waste Packaging Records for Visual Examination of Records	2	2	N/A
35	CCP-TP-180	CCP Analytical Sample Management	1	1	N/A
36	CCP-TP-500	CCP Remote-Handled Waste Visual Examination	8	9	9 - Revised to make changes for a two shift operation and two different sets of qualified operators to be able to work on the same Remote-Handled (RH)-Visual Examination (VE). Added Table 1, Prohibited Items List, and updated language to reflect the permit modification.
37	CCP-TP-530	CCP RH TRU Waste Certification and WWIS Data Entry	8	9	9 - Revised to allow use of the Waste Data System (WDS) as well as include steps for canisters measuring <200 millirem (mRem) per Central Characterization Project (CCP)-Standing Order (SO)-042.

PROCEDURE REVISION MATRIX

SRS/CCP Annual Audit A-11-01

Previous SRS/CCP Annual Audit A-10-01

No	Procedure Number	Procedure Title	Revision During Last Annual Audit	Revision During Current Annual Audit	Brief Description of Procedure Changes
38	WP13-QA.03	Quality Assurance Independent Assessment Program	16	17	17 - Changes in this revision include deletion of requirements to enter conditions corrected during the audit into CTS for external audits, since this data is not needed for trending. Added environmental and software as elements to consider for audit criteria. Added prefix "A" to assessment number for assessment related to the American Recovery and Reinvestment Act.
NEW PROCEDURES ADDED TO CURRENT AUDIT					
1.	CCP-TP-074	CCP Large Container Non-Destructive Examination (LCNDE) Operating Procedure	0	0 - 1	0 – Initial Issue. 1 - Corrected Radiation Generating Device (RGD) issues.