



**Department of Energy**  
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MAR 4 2011



Mr. Steve Zappe, Project Leader  
Hazardous Materials Bureau  
New Mexico Environment Department  
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Subject: Transmittal of CBFO Responses to NMED Comments from Recertification  
Audit A-10-24 of the Advanced Mixed Waste Treatment Project

Dear Mr. Zappe:

This letter transmits the Carlsbad Field Office (CBFO) responses to the New Mexico Environment Department (NMED) comments on Recertification Audit A-10-24 of the Advanced Mixed Waste Treatment Project, and the revised B6-1, B6-2, B6-3, B6-4, and B6-6 checklists. The checklists were revised to address issues identified in a letter from the NMED dated January 28, 2011.

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

Sincerely,

  
Edward Ziemianski (Eoz)  
Acting Manager

Enclosure



Mr. Steve Zappe

-2-

MAR 4 2011

cc: w/o enclosure

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WIPP Operating Record  
CBFO QA File  
CBFO M&RC

**RESPONSES TO NMED COMMENTS ON THE ADVANCED MIXED WASTE  
TREATMENT PROJECT (AMWTP)  
FINAL AUDIT REPORT A-10-24**

1. In question 7 of the B6 checklist the cited procedure, MP-TRUW-8.14, S. 4.0, does not define Summary Category Groups. NMED made this same comment on last year's Audit Report (A-09-19), and CBFO revised the B6 checklist at that time to address NMED's comments.

*Response: The sole reference to the definitions section of the procedure was incorrect. MP-TRUW-8.14 provides instruction for preparation of the Waste Stream Profile Form (WSPF), which ensures proper designation of Summary Category Groups. The AMWTP QAPjP provides clear definition for each Summary Category Group, while the referenced procedure provided direction for completion of the WSPF. The references for question 7 of the B6-1 checklist were revised to include MP-TRUW-8.2, S. B-0c and to change the MP-TRUW-8.14 reference to S. 3.1.3, which provides direction for completing a Characterization Information Summary Report and appropriate tables for each Summary Category Group.*

2. In question 9 of the B6 checklist the cited procedure, INST-FOI-17 (All) implies that the entire procedure addresses incompatible materials. Likewise, MP-Q&SI-5.4 (All) addresses nonconformances, but does not appear to address incompatible materials. Revise these citations to include the specific sections (e.g., INST-FOI-17, S. 4.2, S. 4.6 and Appendix B, etc.) in each procedure that address incompatible materials.

*Response: The "All" cited for INST-FOI-17 in question 9 was changed to INST-FOI-17, Exhibit 4 and Appendix B. The "All" cited for MP-Q&SI-5.4 was changed to S. 3.10, which is the Characterization NCR Remediation Section.*

3. In question 19 of the B6 checklist the following statement in the Comment column is unclear and should be revised: "Interview with HG and SS personnel, examination of HG and SS equipment 8/23-24/10 confirmed information in plans correct and complete."

*Response: This comment was deleted; the comment is an explanation of audited activities.*

4. The list of procedures in question 30 of the B6 checklist appears to be incomplete. While there is objective evidence listed (i.e., batch data reports) for headspace gas, solids sampling, and radiography, the relevant procedures for those activities are not listed.

*Response: The following procedure citations were added to question 30: INST-OI-75 (All); MP-TRUW-8.25(All); and INST-OI-12 (All).*

5. In question 76 of the B6 checklist the comment states, "AMWTP does not have newly generated waste streams." This should be revised to clarify that AMWTP does not have newly generated S3000 or S4000 waste streams.

*Response: Question 76 (Comment Section) verbiage was revised for clarity. It states, "AMWTP does not have newly generated S3000 or S4000 waste streams."*

6. In question 144 of the B6 checklist any of the procedures cited for parts D, E, and F with a location of "(All)" should be more specific by referencing the specific section(s) in the procedures that address the question.

*Response: The checklist question is asking if procedures for the various processes have been prepared. The referenced procedures indicate that the applicable procedures have been prepared. Referencing the entire procedure accurately addresses the question.*

7. In question 148 of the B6 checklist there are no procedures cited.

*Response: The following procedures were cited for question 148: MP-TRUW-8.2, S. B4-3a; MP-RTQP-14.4 (All); and MP-RTQP-14.20 Appendix B, Page B11 of B11.*

8. In question 149b of the B6 Checklist, the citation given for Part G, INST-OI-17, (All) is too generalized to answer the question correctly and the citation should list the Sections that apply to answer the question.

*Response: The citation for Part G of question 149b was changed to INST-OI-17, S. 3.1.18, S. 4.1 (NOTE 3), S. 4.2, and Exhibit 4.*

9. In question 150 of the B6 Checklist, the citation given for Part A, MP-TRUW-8.13, (All) is too generalized to answer the question correctly and the citation should list the Sections that apply to answer the question.

*Response: The citation for question 150, Part A, was changed to: MP-TRUW-8.13, S. 1.0, Figure 1, S. 3.1, and S. 3.2.*

10. In question 168 of the B6 Checklist, the citation given for Part A, MP-M&IA-17.2, (All) does not fully answer the question. The checklist should also cite MP-TRUW-8.2, S. B3-9 for completeness.

*Response: Part A of question 168 was changed to include MP-TRUW-8.2, S. B3-9 for completeness.*

11. In question 168, part E, of the B6 checklist the cited procedure, MP-RTQP-14.4 (All) does not appear to answer the question. The question asks about representativeness of AK information, while the cited procedure relates generally to personnel qualification and certification. Justify the relevance of this procedure.

*Response: The citation of procedure MP-RTQP-14.4 (All) was deleted.*

12. In question 187 of the B6 Checklist, the citation given, INST-OI-11, (All), is too generalized to answer the question correctly. The correct citation should be INST-OI-11, Section 4.4.6.

*Response: The citation for question 187 was changed to INST-OI-11, S. 4.4.6.*

13. In questions 296 through 300 the reference cited, QP-VE-0001, is AMWTP's qualification card, not an implementing procedure. This should be noted in the Comment field.

*Response: The reference cited, QP-VE-0001, for questions 296 – 300 was removed from the "Procedure Documented Location" column.*

14. In question 313 of the B6 checklist the cited procedure, INST-FOI-17 S. "4.2.23 Fig. 5" should be "4.2.20.2 Fig. 5." Additionally, INST-FOI-17 S. 4.2.21.6 does not answer the question. A better citation is INST-FOI-17 S. 4.2.21.7 and 4.2.21.8.

*Response: References to question 313 were changed to include INST-FOI-17, S.4.2.20.2, Figure 5, S. 4.2.21.7, and S. 4.2.21.8. References to sections 4.2.23 and 4.2.21.6 were deleted.*

15. The references to the WIPP Permit and QAPjP sections and language in Appendix B of MP-RTQP-14.20 for VE and RTR training are out of date. For example, Page B8 of B11 cites section B1-3b(3) for VE training, and includes language from the Permit before it was revised in November 2006. The new VE training requirements are covered in section B1-4 of the Permit and QAPjP now.

NMED made this same comment on last year's Audit Report (A-09-19), and CBFO responded that AMWTP would be "made aware of the need for update of Appendix B." NMED notes that changes were made to the training requirements in the renewal Permit issued on November 30, 2010, and therefore the Permittees must now *require* AMWTP to update this procedure to include the current requirements and references to correct sections of the current Permit and QAPjP.

*Response: MP-RTQP-14.20 is in revision to remove Appendix B. The VE training requirements are covered in section B1-4, of MP-TRUW-8.2, Rev. 1; INST-FOI-17, Rev. 1; and INST-OI-34, Rev. 22.*