



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

MAR 30 2011

Ed Ziemianski, Acting Manager
Carlsbad Field Office
U.S. Department of Energy
P.O. Box 3090
Carlsbad, NM 88221



OFFICE OF
AIR AND RADIATION

Dear Mr. Ziemianski:

This letter transmits the scope of the Environmental Protection Agency's (EPA) baseline inspection (Inspection No EPA-BAPL-CCP-RH-04-11.8) of the Central Characterization Project (CCP) at the Bettis Atomic Power Laboratory (BAPL) near West Mifflin, PA.

The EPA baseline inspection is scheduled for April 12 - 14, 2011, at 1310 L Street, NW, Washington, DC. EPA will evaluate the use of acceptable knowledge, visual examination, and radiological characterization methods implemented for characterizing remote-handled (RH) transuranic (TRU) debris waste (Waste Stream BT-T001).

EPA received BAPL-CCP's RH waste characterization documents for review in several installations. As stated in a March 26, 2004 letter from EPA to Paul Detwiler, EPA approval of site-specific RH characterization plans is necessary prior to their implementation. EPA has made a sufficiency determination of the documents received, and with this letter, EPA approves the implementation of BAPL-CCP's RH waste specific characterization documents for characterizing RH TRU waste at BAPL.

The enclosed baseline inspection scope identifies the RH TRU waste characterization system of controls that will be evaluated during the inspection and the inspection schedule. Enclosed Attachment A lists documents EPA must have no later than April 1, 2011, while Attachment B lists documents needed on the first day of the inspection.

Please contact Ed Feltcorn, BAPL-CCP RH Baseline Inspection Team Lead, at 202-343-9422, if you have any questions.

Sincerely,

for Jonathan Edwards, Director
Radiation Protection Division

Enclosure

cc: Electronic Distribution
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**Scope of EPA's Baseline Inspection of BAPL-CCP RH TRU
Waste Characterization Program
Inspection No. EPA-BAPL-CCP-RH-04.11-8**

DOE Site: Bettis Atomic Power Laboratory-Central Characterization Project (BAPL-CCP)

Organizations Notified: Department of Energy – Carlsbad Field Office
Department of Energy – BAPL
New Mexico Environment Department

Inspection Dates and Locations: April 12-14, 2011
EPA HQ Offices
1310 L Street NW, Room 502
Washington, DC 20005

Inspection Schedule: Tuesday 8–9 am, Kick-off Meeting*
Tuesday 9 am – 4 pm, Conduct Inspection
Wednesday 8 am – 4 pm, Conduct Inspection
Thursday 8 am – 10 am, Conduct Inspection
Thursday 11 am, Close-out Meeting*

*With BAPL-CCP Management and technical leads

EPA Inspection Team: Ed Feltcorn – EPA Inspection Team Lead
Rajani Joglekar – EPA Inspector
Patrick Kelly – EPA Inspector (SC&A)
Amir Mobasheran – EPA Inspector (SC&A)
Dorothy Gill – EPA Inspector (SC&A)
Connie Walker – EPA Inspector (SC&A)
Kira Darlow – EPA Inspector (SC&A)
Rose Gogliotti – EPA Inspector (SC&A)

Inspection Scope:

EPA will conduct a baseline inspection in accordance with 40 CFR 194.8(b) to evaluate the adequacy, implementation, and effectiveness of technical processes implemented by BAPL-CCP for characterizing one repackaged, remote-handled (RH) transuranic (TRU) debris (S5000) waste stream (BT-T001).

Characterization Systems To Be Inspected:

From April 12-14, 2011, the following waste characterization components of the system of controls implemented by BAPL-CCP will be evaluated under the inspection authority described in 40 CFR 194.8(b):

- Acceptable Knowledge (AK)
- Radiological Characterization (RC)
- Visual Examination (VE)

This EPA inspection includes evaluation of personnel qualifications/training (by review of records and conducting interviews), and operating procedures to determine regulatory compliance and assess the adequacy of the waste characterization system of controls.

Governing Documents:

On or before March 25, 2011, BAPL-CCP/CBFO provided electronic copies of the following documents:

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

In addition, BAPL-CCP/CBFO provided the current versions of procedures for AK, RC VE and sample collection and other related site documents to facilitate EPA's preparation for the inspection, e.g., CCP-AK-BAPL-500, CCP-AK-BAPL-502, CCP-AK-SRS-560, and CCP-TP-512. EPA approval of site-specific RH waste characterization reports and procedures is required prior to their implementation. EPA approves these procedures with the understanding that the radiological characterization report (CCP-AK-BAPL-501), a key document, has not yet been provided for EPA's review. EPA will use these procedures and other documents to plan the details of their approach to evaluate the adequacy of the program and its compliance with the waste characterization requirements at 40 CFR 194.24.

Additional Documents:

We prefer that the EPA-requested documents be provided electronically. When transmitting documents electronically, in addition to the EPA addressees, we request that they be distributed directly to the following EPA contractor staff at the email addresses shown: Patrick Kelly (pkelly@scainc.com), Connie Walker (conniewalk@aol.com), Kira Darlow (Kdarlow@scainc.com) and Dorothy Gill (lcvccompany@comcast.net).

Attachment A lists documents that must be provided to EPA no later than April 1, 2011. Upon review of the documents provided in advance of the inspection, EPA will identify additional documents needed for inspection. The list for the additional documents will be sent to CBFO and BAPL-CCP via email no later than the week before the BAPL site inspection and must be provided to the EPA inspection team no later than the first day of the inspection, April 12, 2011. Attachment B lists documents that also must be provided to EPA no later than the first day of the BAPL inspection. EPA understands the restrictions associated with distributing documents that are classified as Not Releasable to Foreign Nationals/Governments/Non-US Citizens (NOFORN). However, the inspection

team needs sufficient time to conduct a thorough technical review. Please note that some of these documents may have been provided previously.

Pre- Inspection Conference call:

EPA has scheduled a conference call for April 6, 2011, at 12:00 Noon (EDT) to discuss the inspection scope, missing documents, and other questions that EPA inspectors may have prior to the inspection. The conference call-in number is 1-866-299-3188; 2023439462#.

Inspection Logistics:

The baseline inspection will take place at EPA Headquarters (5th Floor Room 502), 1310 L Street NW, Washington, DC, as listed in the previous page. Due to logistical considerations, EPA inspection team members may need to discuss specific issues with BAPL-CCP personnel prior to the baseline inspection on April 12, 2011. EPA will make CBFO aware of all such conversations to enable their participation, if desired.

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

Attachment A
Information Needed In Advance (No Later Than April 1, 2011) for
EPA Inspection No. EPA-BAPL-CCP-RH-04-11.8

Radiological Characterization

Unless the calculation packages or CCP-AK-BAPL-501 have been revised since they were provided to EPA initially, they do not have to resubmitted to EPA. The following documents are needed:

- CCP-AK-BAPL-501, the radiological characterization report
- Radiochemistry data/BDRs from INTEC laboratory (ADL Series) for all samples
- Quality Control/Quality Assurance data/summary for INTEC analyses

Acceptable Knowledge

The following documents related to BAPL Waste Stream BT-T001 are needed:

- Correlation and Surrogate Summary Form
- AK Summary Report for the related CH waste stream
- Characterization reconciliation Report
- Draft Waste Stream Profile Form
- AK Accuracy Report
- Relevant Discrepancy Resolutions
- AK Source document reference list

Attachment B
Information Needed on April 12, 2011
EPA Baseline Inspection No. EPA-BAPL-CCP-RH-04-11.8

Radiological Characterization

- Revisions to RC-related CCP procedures/reports revised since initial distribution to EPA
- Training Records (Qualification Cards)
- Listing of completed Batch Data Reports (BDRs)
- List of Qualified Individuals (LOQI)
- Comprehensive listing of all pertinent Non Conformance Reports (NCRs)

Acceptable Knowledge

- Revisions to AK-related CCP procedures/reports revised since initial distribution to EPA
- LOQI for AK
- Training Records (Qualification Cards) for AK
- Waste Stream Profile Form and related attachments
- Correlation and Surrogate Summary, if applicable

Visual Examination

- Revisions to VE-related CCP procedures/reports revised since initial distribution to EPA
- LOQI for VE
- Training Records (Qualification Cards) for VE
- Listing of completed VE BDRs
- Comprehensive listing of all NCRs pertinent to VE