



United States Government

Department of Energy

memorandum

 Carlsbad Field Office
 Carlsbad, New Mexico 88221

DATE: APR 7 2011

 REPLY TO
 ATTN OF: CBFO:OQA:DSM:MAG:11-0489:UFC 2300.00

SUBJECT: Notification of Recertification Audit A-11-11 of the LANL/CCP

TO: Mr. Lee Bishop, LASO



Please be advised that an audit team from the Carlsbad Field Office (CBFO) will conduct the subject audit at the Los Alamos National Laboratory (LANL) in Los Alamos, New Mexico, and the Central Characterization Project in Carlsbad, New Mexico, on May 17-19, 2011. The audit 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 and provide the team access to the LANL/CCP facilities, appropriate space to conduct meetings, cognizant personnel to support the audit, and access to the appropriate documentation and records at both sites.

If you have any questions or comments concerning this audit, please contact me at (575) 234-7491.

Dennis S. Miehl
 Acting Director, Office of Quality Assurance

Attachment

cc: w/attachment

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

110407



CARLSBAD FIELD OFFICE AUDIT PLAN

Audit Number: A-11-11

Organization to be Audited: Los Alamos National Laboratory (LANL), Washington TRU Solutions, LLC (WTS) Central Characterization Project (CCP)

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

Date and Location: May 17 – 19, 2011
Los Alamos, New Mexico
Carlsbad, New Mexico

Audit Team:

Dennis S. Miehls	Audit Team Management Representative Carlsbad Field Office (CBFO)
Greg Knox	Audit Team Leader, CBFO Technical Assistance Contractor (CTAC)
Rick Castillo	Auditor, CTAC
Norm Frank	Auditor, CTAC
Cindy Castillo	Auditor, CTAC
Randall Allen	Auditor, CTAC
Priscilla Martinez	Auditor, CTAC
Tammy Bowden	Auditor, CTAC
Tommy Putnam	Auditor, CTAC
Porf Martinez	Auditor/Technical Specialist, CTAC
Dick Blauvelt	Technical Specialist, CTAC
Paul Gomez	Technical Specialist, CTAC
Mavis Lin	Technical Specialist, CTAC
Rhett Bradford	Technical Specialist, CTAC
James Oliver	Technical Specialist, CTAC
B. J. Verret	Technical Specialist, CTAC
Joe Willis	Technical Specialist, WTS

Audit Scope:

The audit team will evaluate the continued adequacy, implementation, and effectiveness of the CCP quality assurance (QA), technical, and transportation activities performed at LANL for characterization, certification, and transportation of contact-handled (CH) homogeneous solids waste (S3000) and debris waste (S5000). See the attachment "Processes and Equipment to be Evaluated During Audit A-11-11 of the LANL/CCP" for additional details.

In addition to recertification of existing processes, the CBFO Office of the National TRU Program (NTP) has requested initial certification of the SuperHENC for nondestructive assay (NDA) of standard waste boxes (SWBs) and 55-gallon drums for S3000 homogeneous solids and S5000 debris waste. The NTP has also requested initial certification of the High Energy Real-Time Radiography system to characterize S3000 homogeneous solids and S5000 debris waste in 55-gallon drums and SWBs.

Governing Documents/Requirements

Overall program adequacy and effectiveness of the LANL/CCP processes will be based on the current revisions of the following documents.

- DOE/CBFO-94-1012, *Quality Assurance Program Document (QAPD)*
- Hazardous Waste Facility Permit Waste Isolation Pilot Plant EPA No. NM4890139088-TSDF, the New Mexico Environment Department
- DOE/WIPP-02-3122, *Transuranic Waste Acceptance Criteria for the Waste Isolation Pilot Plant (WAC)*
- *TRUPACT-II Authorized Methods for Payload Control (TRAMPAC)*

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

- CCP-PO-001, *CCP Transuranic Waste Quality Assurance Characterization Project Plan (QAPjP)*
- CCP-PO-002, *CCP Transuranic Waste Certification Plan*
- CCP-PO-003, *CCP Transuranic Authorized Methods for Payload Control (CCP CH TRAMPAC)*
- CCP-PO-012, *CCP/LANL Interface Document*
- 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

C6-1 and C6-3 and General Quality Assurance Program Elements

- Nonconformances
- Personnel Qualification and Training
- Records
- Identification and Control of Items
- Documents/Records Control (notebooks/logbooks)

Technical

- Generation and Project-Level Data Validation and Verification (V&V)
- Acceptable Knowledge (AK)
- Visual Examination (VE)
- Visual Examination Technique (VET), Off-Site Source Recovery Program
- Real-time Radiography (RTR)
- Nondestructive Assay (NDA) and participation in the Performance Demonstration Program (PDP)
- Dose-to-Curie (DTC)
- Headspace Gas (HSG) Sampling
- WIPP Waste Information System (WWIS)/Waste Data System (WDS)
- Waste Certification (e.g., Waste Stream Profile Form)

Transportation

- Packaging Operations
- Waste Certification
- Shipping
- Leak Testing
- Payload Assembly and Loading
- Load Management
- Shipping Documentation
- Flammable Gas Analysis
- Container Management

Schedule of Audit Activities:

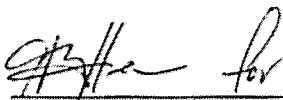
A pre-audit conference is scheduled for Tuesday, May 17, 2011, at 8:00 a.m.

Audit team caucus meetings will be held daily, May 17 – 19, 2011.


The audit team will brief appropriate LANL and CCP management on Wednesday, May 18, and Thursday, May 19, 2011, at 8:00 a.m.

A post-audit conference is scheduled for Thursday, May 19, 2011, at 4:30 p.m.

All meetings will take place at designated LANL and CBFO locations to be determined.

Prepared by: 
Greg Knox, CTAC
Audit Team Leader

Date: 3/30/11

Concurrence: 
Dennis S. Miehl, CBFO
Acting Director, Office of Quality Assurance

Date: 4-1-11

Processes and Equipment to be Evaluated During Audit A-11-11 of the LANL/CCP

WIPP #	Process/Equipment Description	Applicable to the Following Waste Streams/Groups of Waste Streams	Currently Approved by NMED	Currently Approved by EPA
PROCESSES TO BE EVALUATED FOR INITIAL CERTIFICATION				
11SHC1	Nondestructive Assay Procedure – CCP-TP-059 Description – Canberra Industries High Efficiency Neutron Counter (SuperHENC) Standard Waste Boxes and 55-gallon drums	Solids (S3000) Debris (S5000)	N/A	NO
11HERTR3	High Energy Real Time Radiography Procedure – CCP-TP-053 Description – High Energy Real-Time Radiography Characterization System (HE-RTR) Standard Waste Boxes and 55-gallon drums	Solids (S3000) Debris (S5000)	NO	NO
PREVIOUSLY APPROVED PROCESSES OR EQUIPMENT				
N/A	Headspace Gas Sampling Procedure – CCP -TP-093 Description – Headspace Gas Sampling (HSG)	Debris (S5000)	YES	N/A
11RR1	Real-Time Radiography (RTR) Procedure(s) – CCP-TP-053 and CCP-TP-028 Description – Real-Time Radiography (RTR) Mobile Characterization System [built by VJ Technologies] 55-gallon drums	Solids (S3000) Debris (S5000)	YES	YES
11RR2	Real-Time Radiography (RTR) Procedure(s) – CCP-TP-053 and CCP-TP-028 Description – Real-Time Radiography (RTR) Mobile Characterization System [built by VJ Technologies] 55-gallon drums	Solids (S3000) Debris (S5000)	YES	YES

Processes and Equipment to be Evaluated During Audit A-11-11 of the LANL/CCP

WIPP #	Process/Equipment Description	Applicable to the Following Waste Streams/Groups of Waste Streams	Currently Approved by NMED	Currently Approved by EPA
11VE1	CH Visual Examination Procedure – CCP-TP-113 Description – CH Characterization performed utilizing Visual Examination (VE) and Acceptable Knowledge	Solids (S3000) Debris (S5000)	YES	YES
11VE2	Off-Site Source Recovery Program Procedure(s) – CCP-TP-069 and CCP-TP-101 Description – Characterization performed utilizing Visual Examination (VE) and Acceptable Knowledge	Debris (S5000)	YES	YES
N/A	Acceptable Knowledge Procedure – CCP-TP-005 Description – Acceptable Knowledge (AK)	Solids (S3000) Debris (S5000)	YES	YES
N/A	Data Verification and Validation Procedure(s) – CCP-TP-001, CCP-TP-002, CCP-TP-003, CCP-TP-103, CCP-TP-162	Solids (S3000) Debris (S5000)	YES	YES
11HC1	Nondestructive Assay Procedure – CCP-TP-063 Description – Canberra Industries High Efficiency Neutron Counter (HENC) mounted in a transportation container.	Solids (S3000) Debris (S5000)	N/A	YES
11HC2	Nondestructive Assay Procedure – CCP-TP-063 Description – Canberra Industries High Efficiency Neutron Counter (HENC) mounted in a trailer.	Solids (S3000) Debris (S5000)	N/A	YES

Processes and Equipment to be Evaluated During Audit A-11-11 of the LANL/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	WWIS/WDS Procedure – CCP-TP-030 Description – CH TRU Waste Characterization and WWIS Data Entry	Solids (S3000) Debris (S5000)	YES	YES
N/A	Transportation Procedure(s) – CCP-TP-054, CCP-TP-055, CCP-TP-086, DOE/WIPP-02-3184, DOE/WIPP-02-3220, DOE/WIPP-02-3183	Solids (S3000) Debris (S5000)	N/A	N/A
11HG2	Flammable Gas Analysis Procedure – DOE/WIPP-06-3345 Description – Flammable Gas Analysis (FGA)	Solids (S3000) Debris (S5000)	N/A	N/A
N/A	Headspace Gas Sampling Procedure – CCP-TP-093 Description – Summa Sampling only	Debris (S5000)	N/A	N/A
N/A	Quality Assurance Program	Solids (S3000) Debris (S5000)	N/A	YES

Table J-2
Analytical Methods for Soil Samples

Parameter/ Constituent	EPA Hazardous Waste Number	Test Method	Reference
Explosive Compounds	D003	8330	Test Methods for Evaluating Solid Waste, Physical and Chemical Methods, EPA SW-846, 3rd Ed. November 1986 (amended).
HMX RDX 1,3,5-Trinitrobenzene (TNB) 1,3-Dinitrobenzene (DNB) Tetryl Nitrobenzene(NB) 2,4-DNT 2,6-DNT 2-Am-DNT 4-Am-DNT 2-Nitrotoluene (NT) 3-NT 4-NT Nitroglycerin		8332	
Toxic Metals			Test Methods for Evaluating Solid Waste, Physical and Chemical Methods, EPA SW-846, 3rd Ed. November 1986 (amended).
Antimony Arsenic Barium Beryllium Cadmium Chromium Copper Lead Mercury Nickel Selenium Silver	-- D004 D005 -- D006 D007 -- D008 D009 -- D010 D011	6010 6010 6010 6010 6010 6010 6010 6010 7471 6010 6010 6010	
Soil Moisture	--	3550	Test Methods for Evaluating Solid Waste, Physical and Chemical Methods, EPA SW-846, 3rd Ed. November 1986 (amended).