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Department of Energy
Carlsbad Field Office
P.O. Box 3090
Carlsbad, New Mexico 88221

APR 7 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 Audit Plan and Notification of Assigned Auditors for CBFO Audit
A-11-11 of the LANL/CCP

Dear Mr. Zappe:

This letter transmits the audit plan for Carlsbad Field Office (CBFO) Recertification Audit A-11-11 of the Los Alamos National Laboratory Central Characterization Project (LANL/CCP) for transuranic waste characterization activities. The audit will be conducted as required by the Waste Isolation Pilot Plant Hazardous Waste Facility Permit, and will be held at the Skeen-Whitlock Building in Carlsbad, New Mexico, and at LANL, on May 17-19, 2011. The audit plan identifies the audit team members as required by the Permit.

If you have any questions concerning this notification, please contact Dennis S. Miehl, Acting Director, Office of Quality Assurance, at (575) 234-7491.

Sincerely,


Edward Ziemianski
Acting Manager

Enclosure

cc: w/enclosure
O. Vincent, CBFO *ED
G. Basabivazo, CBFO ED
D. Miehl, CBFO ED
M. Navarrete, CBFO ED
N. Castaneda, CBFO ED
S. McCauslin, CBFO ED
S. Holmes, NMED ED
G. Knox, CTAC ED
K. Martin, CTAC ED
WIPP Operating Record ED
CBFO QA File
CBFO M&RC
*ED denotes electronic distribution



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. Miehl | 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:

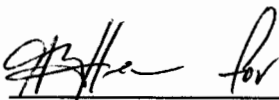
A pre-audit conference is scheduled for Tuesday, May 17, 2011, at 8:00 a.m.

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 |