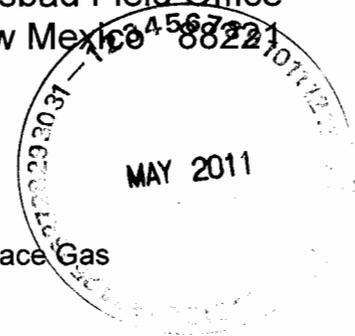


# memorandum

Carlsbad Field Office  
Carlsbad, New Mexico 88221



DATE: May 5, 2011

REPLY TO  
ATTN OF: CBFO:OQA:MPN:MAG:11-0548:UFC 2300.00

SUBJECT: Recertification Audit A-11-13 of the INL/CCP Analytical Solids and Headspace Gas Laboratories

TO: Jerry L. Wells, DOE-ID

Please be advised that a team of auditors and technical specialists from the Carlsbad Field Office (CBFO) will conduct an audit of the Idaho National Laboratory Central Characterization Project (INL/CCP) Analytical Solids and Headspace Gas Laboratories at the INL/CCP facilities near Idaho Falls, Idaho, June 7-9, 2011. The audit will be conducted in accordance with the attached audit plan. Representatives from CBFO and the New Mexico Environment Department (NMED) may be present to observe the audit process.

Your representatives are requested to coordinate with the audit team to develop the necessary documentation for the audit team to access the INL/CCP facilities and conduct the audit, and to have access to necessary documentation and records. Please provide meeting rooms for the entrance and exit meetings and working space for the audit team and NMED observers. In addition, please provide a full set of documentation applicable to INL/CCP work for the Waste Isolation Pilot Plant, including applicable procedures.

If you have any questions or comments concerning the audit, please contact me at (575) 234-7483.

Martin P. Navarrete  
Acting Director, Office of Quality Assurance

### Attachment

cc: w/attachment

D. Miehl, CBFO	*ED	R. Lee, EPA	ED
J. R. Stroble, CBFO	ED	J. Kieling, NMED	ED
H. Budweg, CBFO	ED	S. Holmes, NMED	ED
N. Castaneda, CBFO	ED	T. Hall, NMED	ED
W. Lattin, DOE-ID	ED	T. Kesterson, DOE OB WIPP NMED	ED
D. Haar, WTS/CCP	ED	D. Winters, DNFSB	ED
D. Ploetz, WTS/CCP	ED	P. Gilbert, LANL-CO	ED
V. Cannon, WTS/CCP	ED	G. Lyshik, LANL-CO	ED
A. J. Fisher, WTS/CCP	ED	P. Y. Martinez, CTAC	ED
M. Walker, WTS/CCP	ED	K. D. Martin, CTAC	ED
Y. Salmon, WTS/CCP	ED	WIPP Operating Record	ED
M. Eagle, EPA	ED	CBFO QA File	
S. Ghose, EPA	ED	CBFO M&RC	

\*ED denotes electronic distribution



## CARLSBAD FIELD OFFICE AUDIT PLAN

**Audit Number:** A-11-13

**Organization to be Audited:** Idaho National Laboratory Central Characterization Project (INL-CCP)

**Organizations to be Notified:** Department of Energy – Idaho Falls (DOE-ID)  
New Mexico Environment Department (NMED)  
Defense Nuclear Facilities Safety Board (DNFSB)  
Washington TRU Solutions, LLC (WTS)

**Date and Location:** June 7 – 9, 2011  
Idaho Falls, Idaho

**Audit Team:**

Martin Navarrete	Audit Team Management Representative, Carlsbad Field Office (CBFO)
Priscilla Y. Martinez	Audit Team Leader, Carlsbad Field Office Technical Assistance Contractor (CTAC)
Earl Bradford	Auditor, CTAC
Margie Martinez	Auditor, CTAC
Charlie Riggs	Auditor, CTAC
Mavis Lin	Technical Specialist, CTAC
Paul Gomez	Technical Specialist, CTAC

### Audit Scope:

The audit will evaluate the continued adequacy, implementation, and effectiveness of the INL-CCP Quality Assurance (QA) Program activities and technical activities related to headspace gas (HSG) analysis of Summary Category Group (SCG) S5000 debris waste; analysis of S3000 homogeneous solids and S4000 soils/gravel waste; generation-level data validation and verification (V&V); and SUMMA<sup>®</sup> canister preparation and certification for use by other generator sites. The specific items to be audited are listed under Activities to be Audited.

### Activities to be Audited:

#### Quality Assurance activities:

- Nonconformances
- Personnel Qualification and Training
- QA Records
- Sample Control

Technical Elements:

- Generation-Level Data Validation and Verification
- Headspace Gas Analysis
- Solids Analysis
- SUMMA<sup>®</sup> Sample Canister Preparation

The following areas from section C6-3 of the Hazardous Waste Facility Permit will be audited:

- Results of the previous audit
- Changes in programs or operations
- New programs or activities being implemented (if necessary)
- Changes in key personnel

See the attachment "Processes and Equipment to be Reviewed During Audit A-11-13 of INL-CCP Analytical Solids and Headspace Gas Laboratories."

**Governing Documents/Requirements:**

Adequacy of INL-CCP QA activities to be reviewed will be based on the current revisions of the following documents:

NM4890139088-TSDF, Waste Isolation Pilot Plant Hazardous Waste Facility Permit

DOE/CBFO-94-1012, *Quality Assurance Program Document (QAPD)*

DOE/WIPP-02-3122, *Transuranic Waste Acceptance Criteria for the Waste Isolation Pilot Plant (WAC)*

In addition, programmatic and technical checklists will be developed from the current revisions of the following documents:

CCP-PO-001, *CCP Transuranic Waste Characterization Quality Assurance Project Plan*

CCP-PO-002, *CCP Transuranic Waste Certification Plan*

CCP-PO-030, *CCP/Battelle Energy Alliance Analytical Chemistry & Instrument Department Interface Document*

CCP-PO-031, *CCP/Idaho Cleanup Project Analytical Laboratories Department Interface Document*

Related QA and technical implementing procedures

**Schedule of Audit Activities:**

A pre-audit conference will be held Tuesday, June 7, 2011, at 8:00 a.m.

Audit team caucus meetings will be held Tuesday and Wednesday, June 7 and 8, 2011, at 4:00 p.m.

An audit team caucus meeting will be held Thursday, June 9, 2011, at 2:00 p.m.

Daily management briefings will be held Wednesday and Thursday, June 8 and 9, 2011, at 8:30 a.m.

A post-audit conference is scheduled for Thursday, June 9, 2011, at 3:00 p.m.

All meetings will take place at a location to be determined.

Prepared by: Priscilla Y. Martinez  
Priscilla Y. Martinez, CTAC  
Audit Team Leader

Date: 4-28-11

Concurrence by: Martin P. Navarrete  
Martin P. Navarrete, CBFO  
Acting Quality Assurance Director

Date: 5-4-11

**Processes and Equipment to Be Reviewed During Audit A-11-13 of the INL-CCP  
Analytical Solids and Headspace Gas Laboratories**

WIPP #	Process/Equipment Description	Applicable to the Following Waste Streams/Groups of Waste Streams	Currently Approved by NMED	Currently Approved by EPA
<b>NEW PROCESSES OR EQUIPMENT</b>				
	NONE			
<b>PREVIOUSLY APPROVED PROCESSES OR EQUIPMENT</b>				
<b>Headspace Gas</b>				
12HE4	Environmental Chemistry Lab (ECL) – Headspace gas volatile organic compounds specified in Procedure CCP-TP-175 Equipment = GC/MS-H	DEBRIS (S5000)	Yes	N/A
12HE5	Environmental Chemistry Lab (ECL) – Headspace gas volatile organic compounds specified in Procedure CCP-TP-173 Equipment = GC-1	DEBRIS (S5000)	Yes	N/A
12HE6	Environmental Chemistry Lab (ECL) – Headspace gas volatile organic compounds specified in Procedure CCP-TP-173 Equipment = GC-2	DEBRIS (S5000)	Yes	N/A

**Processes and Equipment to Be Reviewed During Audit A-11-13 of the INL-CCP  
Analytical Solids and Headspace Gas Laboratories**

WIPP #	Process/Equipment Description	Applicable to the Following Waste Streams/Groups of Waste Streams	Currently Approved by NMED	Currently Approved by EPA
12HE9	Environmental Chemistry Lab (ECL) – Headspace gas volatile organic compounds specified in Procedure CCP-TP-173 Equipment = GC-7	DEBRIS (S5000)	Yes	N/A
<b>Solids</b>				
12HA3	Analytical Laboratory Department (ALD) – Total non-halogenated volatile organic compounds specified in Procedure CCP-TP-186 Equipment = GC-1	SOILS/GRAVEL (S4000) HOMOGENEOUS SOLIDS (S3000)	Yes	N/A
12HA8	Analytical Laboratory Department (ALD) – Total purgable volatile organic compound analysis specified in Procedure CCP-TP-184 Equipment = VOA-4	SOILS/GRAVEL (S4000) HOMOGENEOUS SOLIDS (S3000)	Yes	N/A
12HA10	Analytical Laboratory Department (ALD) – Total semi-volatile organic compounds specified in Procedure CCP-TP-185 Equipment = SV-6	SOILS/GRAVEL (S4000) HOMOGENEOUS SOLIDS (S3000)	Yes	N/A
12HA12	Analytical Laboratory Department (ALD) – Total semi-volatile organic compounds specified in Procedure CCP-TP-185 Equipment = SV-8	SOILS/GRAVEL (S4000) HOMOGENEOUS SOLIDS (S3000)	Yes	N/A

**Processes and Equipment to Be Reviewed During Audit A-11-13 of the INL-CCP  
Analytical Solids and Headspace Gas Laboratories**

WIPP #	Process/Equipment Description	Applicable to the Following Waste Streams/Groups of Waste Streams	Currently Approved by NMED	Currently Approved by EPA
12HA13	Analytical Laboratory Department (ALD) – Total purgable volatile organic compounds specified in Procedure CCP-TP-184 Equipment = VOA-5	SOILS/GRAVEL (S4000) HOMOGENEOUS SOLIDS (S3000)	Yes	N/A
12HA14	Analytical Laboratory Department (ALD) – Total non-halogenated volatile organic compounds specified in Procedure CCP-TP-186 Equipment = GC-6	SOILS/GRAVEL (S4000) HOMOGENEOUS SOLIDS (S3000)	Yes	N/A
12HM8	Analytical Laboratory Department (ALD) – Total metals (Hg) analysis specified in Procedure CCP-TP-181 Equipment = CVHG-2	SOILS/GRAVEL (S4000) HOMOGENEOUS SOLIDS (S3000)	Yes	N/A
12HM9	Analytical Laboratory Department (ALD) – Total metals digestion specified in Procedure CCP-TP-183 Equipment = MW-3	SOILS/GRAVEL (S4000) HOMOGENEOUS SOLIDS (S3000)	Yes	N/A
12HM10	Analytical Laboratory Department (ALD) – Total metals digestion specified in Procedure CCP-TP-183 Equipment = MW-4	SOILS/GRAVEL (S4000) HOMOGENEOUS SOLIDS (S3000)	Yes	N/A
12HM11	Analytical Laboratory Department (ALD) – Total metals analysis specified in Procedure CCP-TP-182 Equipment = ICP-7	SOILS/GRAVEL (S4000) HOMOGENEOUS SOLIDS (S3000)	Yes	N/A

**Processes and Equipment to Be Reviewed During Audit A-11-13 of the INL-CCP  
Analytical Solids and Headspace Gas Laboratories**

WIPP #	Process/Equipment Description	Applicable to the Following Waste Streams/Groups of Waste Streams	Currently Approved by NMED	Currently Approved by EPA
12HM12	Analytical Laboratory Department (ALD) – Total metals (Hg) analysis specified in Procedure CCP-TP-181 Equipment = CVHG-3	SOILS/GRAVEL (S4000) HOMOGENEOUS SOLIDS (S3000)	Yes	N/A
<b>Processes</b>				
N/A	Data Validation and Verification	DEBRIS (S5000) SOILS/GRAVEL (S4000) HOMOGENEOUS SOLIDS (S3000)	Yes	Yes
N/A	Sample Management as described in Procedure CCP-TP-180	SOILS/GRAVEL (S4000) HOMOGENEOUS SOLIDS (S3000)	Yes	N/A
N/A	SUMMA Canister Cleaning for generator/storage sites HSG sample collection, as described in Procedure CCP-TP-178	DEBRIS (S5000)	Yes	N/A
<b>Deactivated Equipment</b>				
12HE2	Environmental Chemistry Lab (ECL) – Headspace gas volatile organic compounds specified in Procedure CCP-TP-175 Equipment = GC/MS-F	DEBRIS (S5000)	Deactivated May 2010	Deactivated May 2010