

memorandum

Carlsbad Field Office
Carlsbad, New Mexico 88221

DATE: May 5, 2011
REPLY TO
ATTN OF: CBFO:OQA:DSM:MAG:11-0555:UFC 2300.00
SUBJECT: Recertification Audit A-11-14 of the INL/CCP Transuranic Waste Activities
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) at the INL/CCP facilities near Idaho Falls, Idaho, and at the CBFO Skeen-Whitlock Building in Carlsbad, New Mexico, June 7-9, 2011. The audit will be conducted in accordance with the attached audit plan. The purpose of the audit is to determine whether transuranic waste characterization and transportation activities should be recertified by CBFO for the Waste Isolation Pilot Plant (WIPP).

Representatives from CBFO and the New Mexico Environment Department (NMED) may be present to observe the audit process. Representatives from the U.S. Environmental Protection Agency (EPA) may be present to conduct an independent inspection.

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 to hold approximately 50 people for the entrance and exit meetings, working rooms for the audit team, the NMED observers, and the EPA inspectors, as well as a full set of documentation applicable to INL/CCP work for the WIPP, including applicable procedures.

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

Dennis S. Miehl
Senior Quality Assurance Specialist

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	T. Bowden, 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	
E. Feltcorn, EPA	ED	CBFO M&RC	
S. Ghose, EPA	ED	*ED denotes electronic distribution	

110516



CARLSBAD FIELD OFFICE AUDIT PLAN

Audit Number: A-11-14

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

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

Date and Location: June 7 – 9, 2011
Idaho Falls, Idaho
Carlsbad, New Mexico

Audit Team:

Tamara Bowden	Audit Team Leader, Carlsbad Field Office Technical Assistance Contractor (CTAC)
Dennis S. Miehls	Carlsbad Field Office (CBFO), Management Representative
Randall Allen	Auditor/Audits & Assessments Manager, CTAC
Katie Martin	Auditor, CTAC (VE)
Cindi Castillo	Auditor, CTAC (HSG, GGT, Flam Gas)
Greg Knox	Auditor, CTAC (RTR)
Rick Castillo	Auditor, CTAC (NDA & DTC)
Norm Frank**	Auditor, CTAC (AK)
Tommy Putnam	Auditor, CTAC (Transportation)
Jack Walsh**	Auditor, CTAC (C6 QA)
Porf Martinez	Technical Specialist/Auditor, CTAC (RTR)
Paul Gomez	Technical Specialist, CTAC (PL V&V)
Charleen Roberts**	Technical Specialist, CTAC (AK)
Rhett Bradford	Technical Specialist, CTAC (VE)
B.J. Verret	Technical Specialist, CTAC (HSG, GGT, Flam Gas)
Dick Blauvelt**	Technical Specialist, CTAC (AK)
Jim Oliver	Technical Specialist, CTAC (NDA & DTC)
Joe Willis	Technical Specialist, WTS (Transportation)
Steve McGonagill	Technical Specialist, WTS (Transportation)

** Identifies personnel auditing in Carlsbad, NM

Audit Scope:

The audit team will evaluate the continued adequacy, implementation, and effectiveness of INL/CCP transuranic (TRU) waste activities as they relate to the Waste Isolation Pilot Plant (WIPP) Hazardous Waste Facility Permit (HWFP) for characterization and certification of contact-handled (CH) Summary Category Group (SCG) S3000 homogeneous solids, S4000 soils/gravel, S5000 debris, and remote-handled (RH) S3000 homogeneous solids and S5000 debris waste.

The scope includes evaluation of validation and verification (V&V) of data resulting from headspace gas (HSG) samples and soils/gravel samples collected by INL/CCP and solid samples collected by the Advanced Mixed Waste Treatment Project (AMWTP) and analyzed by the INL/CCP laboratories. The specific items to be audited are listed under Activities to be Audited.

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-related quality assurance (QA) activities in Carlsbad, NM

- Personnel Qualification and Training
- Records
- Quality Improvement/Nonconformances
- WIPP Waste Information System (WWIS)/Waste Data System (WDS)

The following technical elements will be evaluated for compliance with the HWFP, utilizing the checklists in Attachment C6:

Carlsbad, NM

- Project-Level Data Validation and Verification
- Acceptable Knowledge (AK)
- Waste certification (e.g., Waste Stream Profile Form)

INL (Idaho Falls)

- Real-time radiography (RTR)
- Visual examination (VE)
- Headspace gas (HSG) sampling
- Solids sampling of soils/gravels

- Sample control
- Nondestructive assay (NDA)
- Dose-to-Curie (DTC)
- Flammable gas analysis
- Container Management
- Transportation

See the attachment, Process and Equipment to be Reviewed During Audit A-11-14 of INL/CCP, for additional details.

Governing Documents/Requirements:

Adequacy of INL/CCP documents 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)*

DOEWIPP-02-3214, *Remote-Handled TRU Waste Characterization Program Implementation Plan (WCPIP)*

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

TRUPACT-II Safety Analysis Report: *TRUPACT-II Authorized Methods for Payload Control (TRAMPAC)*, and the TRUPACT-II Certification of Compliance NRC 71-9281

RH-TRU 72B Safety Analysis Report: *Remote-Handled Transuranic Waste Authorized Methods for Payload Control (RH-TRAMPAC)*, and the RH-TRU 72-B Certification of Compliance 71-9212

Programmatic and technical checklists will be developed from the active revisions of the following documents:

CCP-PO-001, *CCP Transuranic Waste Characterization Quality Assurance 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-505, *CCP Remote-Handled Transuranic Waste Authorized Methods*

for Payload Control (CCP RH-TRAMPAC)

CCP-PO-024, CCP/INL Interface Document

CCP-PO-501, CCP/INL RH TRU Waste Interface Document

Related INL/CCP and WTS CCP 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 – 8, 2011, at 4:00 p.m.

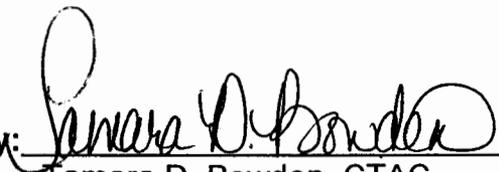
An audit team caucus meeting will be held Thursday, June 9, 2011, at 2:00 p.m.

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

A post-audit conference is scheduled for Thursday, June 9, 2011, at 4:00 p.m.

All meetings will take place at the designated INL and CBFO locations.

Prepared by:

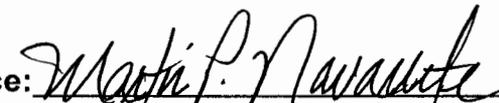


Tamara D. Bowden, CTAC
Audit Team Leader

Date:

5/3/11

Concurrence:



Martin P. Navarrete, CBFO
Acting Quality Assurance Director

Date:

5-4-11

Processes and Equipment to be Reviewed During Audit A-11-14 of the INL/CCP

WIPP #	Process/Equipment Description	Applicable to the Following Waste Streams/Groups of Waste Streams	Currently Approved by NMED	Currently Approved by EPA
NEW PROCESSES OR EQUIPMENT				
	NONE			
PREVIOUSLY APPROVED PROCESSES OR EQUIPMENT				
TBD	Visual Examination Procedure – CCP-TP-113 and CCP-TP-163 Description – Visual Examination	Debris (S5000)	YES	YES
14VE1	Visual Examination (VE) Procedure – CCP-TP-006 Description – Visual Examination Technique (VET)	Solids (S3000) Soils (S4000) Debris (S5000)	YES	YES
14RHVE1	Visual Examination Procedure – CCP-TP-500 Description - The VE of audio/video media process used for a total of 70 retrievably stored remote-handled (RH) debris waste drums	Solids (S3000) Soils (S4000) Debris (S5000)	YES	YES
14RR2	Nondestructive Examination Procedure – CCP-TP-053 Equipment – MCS RTR-5 Description – MCS Real-time Radiography (RTR) Mobile Characterization (RTR-5) System	Solids (S3000) Debris (S5000)	YES	YES
14RRH1	Nondestructive Examination Procedure – CCP-TP-508 Equipment – RTR-RTR-0659 Description – VJ Technologies, Real-time Radiography Characterization (RTR-RTR-0659) System	Debris (S5000)	YES	YES
14GG1	Gas Generation Testing Procedure – CCP-TP-083 Equipment – MGSS Unit/Cart 1 (GC-14B) Description – Gas Generation Testing 55-gallon drums	Waste Type IV	N/A	N/A
14GG2	Gas Generation Testing Procedure – CCP-TP-083 Equipment – MGSS Unit/Cart 2 (GC-17A) Description – Gas Generation Testing 55-gallon drums	Waste Type IV	N/A	N/A

Processes and Equipment to be Reviewed During Audit A-11-14 of the INL/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	Acceptable Knowledge	Solids (S3000) Soils (S4000) Debris (S5000)	YES	YES
N/A	Solids/Soils and Gravel Sampling and Custody	Solids (S3000) Soils (S4000)	YES	N/A
N/A	Solids/Soils and Gravel Sampling and Custody for RH	Solids (S3000)	YES	N/A
N/A	SUMMA [®] Headspace Gas (HSG) Sampling and Custody	Debris (S5000)	YES	N/A
N/A	Data Validation and Verification	Solids (S3000) Soils (S4000) Debris (S5000)	YES	YES
N/A	WIPP Waste Information System (WWIS)	Solids (S3000) Soils (S4000) Debris (S5000)	YES	YES
14SHC1	Nondestructive Assay Procedure – CCP-TP-146 Description – CCP Super High Efficiency Neutron Counter	Solids (S3000) Debris (S5000)	N/A	YES
14HENC1	Nondestructive Assay Procedure – CCP-TP-107 Description – CCP High Efficiency Neutron Counter	Solids (S3000) Soils (S4000) Debris (S5000)	N/A	YES

Processes and Equipment to be Reviewed During Audit A-11-14 of the INL/CCP

WIPP #	Process/Equipment Description	Applicable to the Following Waste Streams/Groups of Waste Streams	Currently Approved by NMED	Currently Approved by EPA
14SGRS1	Nondestructive Assay Procedure – CCP-TP-115 Description – Stored Waste Examination Pilot Plant (SWEPP) Gamma Ray Spectrometer (SGRS)	Solids (S3000) Soils (S4000) Debris (S5000)	N/A	YES
14WAGS1	Nondestructive Assay Procedure – CCP-TP-019 Description – Waste Assay Gamma Spectrometer	Solids (S3000) Soils (S4000) Debris (S5000)	N/A	YES
14DTC1	Radiological characterization process using dose-to-curie (DTC) and modeling-derived scaling factors for assigning radionuclide values to RH waste stream Dose-rate fractional contribution of Cs-137 and Co-60 using OSPREY La ₃ Br(Ce) gamma detector Procedure CCP-TP-504	Solids (S3000) Debris (S5000)	N/A	YES
N/A	Load Management	Solids (S3000) Soils (S4000) Debris (S5000)	N/A	YES
N/A	Quality Assurance Program	Solids (S3000) Soils (S4000) Debris (S5000)	N/A	YES