

**MEMORANDUM**

**TO:** John Kieling, Steve Holmes, Tim Hall, and Ricardo Maestas, New Mexico Environmental Department, Hazardous Waste Bureau

**FROM:** Connie Walker and Robert Thielke

**DATE:** June 24, 2011

**SUBJECT:** Summary of NMED AK Observation of CCP Idaho National Laboratory Certification Audit A-11-14



On June 7-9, 2011 the New Mexico Environment Department (NMED) observed the Acceptable Knowledge (AK), portions of DOE CBFO certification audit of CCP Idaho National Laboratory (INL). The scope of audit A-11-14 was to evaluate the adequacy, implementation, and effectiveness of technical and related QA processes for the CH Debris and Solids waste streams. The AK portion of the audit was performed in Carlsbad, New Mexico.

**Acceptable Knowledge**

The AK technical specialists were Mr. Dick Blauvelt and Ms. Charlene Roberts; and QA auditor was Mr. Norm Frank. Acceptable Knowledge Experts (AKEs), Mr. Scott Smith and Ms. Carrie Johnson; and Assistant Site Project Manager (SPM), Ms. Laura Nelson, were interviewed and provided documents and information as requested by the audit team. The primary SPM, Ms. Irene Quintana, was not available during the course of the audit. The NMED observer was Mr. Robert Thielke (NMED support contractor, Trinity Engineering Associates). The documents presented in Attachment C were among those provided in hard copy and electronically to the audit team, including the NMED observers.

**The following BDRS were provided for review:**

Waste Stream	Drum	RTR BDRs	VE BDRs	HSG BDRs	Solids BDRs
INL-001 ID-SDA-SOIL	ARP 22785 (solids)	N/A	IN-ARP-VE-002125	N/A	ALD10025M, N, V, S S4200-LOT-04-05
INL-001 ID-SDA-SOIL	ARP21986 (solids)	N/A	IN-ARP-VE-0020286	N/A	N/A
INL-018 LL-M001-S5400	LL85001762 (debris)	INRTR5100033	N/A	INHSG100006 ECL10024G, M	N/A
INL-018 LL-M001-S5400	LL85001009 (debris)	INRTR5100036	N/A	N/A	N/A
INL-018 LL-T004-S3141	LL85201174 (solid)	INRTR5100031	N/A	N/A	SSG-10-00003 ALD1058M, N, V, S



Waste Stream	Drum	RTR BDRs	VE BDRs	HSG BDRs	Solids BDRs
INL-018 LL-T004- S3141	LL8501750 (solid)	INRTR5100031	N/A	N/A	N/A
INL-520 IDC-RTC- S3000	IDIRTRA8822 (solid)	N/A	RHINLVE100001	N/A	IDRH0902 ALD9007M, N, S, V
INL-580 ID-HFEF- S5400-RH	IDAWANL- 870107A (debris)	INRHRTR090006	N/A	INHSG090009 ECL09022M, G	N/A
INL-580 ID-HFEF- S5400-RH	SNL147A (debris)	N/A	N/A	INHSG100008 ECL10031M, G	N/A
INL-580 ID-HFEF- S5400-RH	SN114A (debris)	INRHRTR10012	N/A	N/A	N/A

**Summary:**

The audit, CBFO Audit A-11-14, was performed in a professional manner. The scope of the audit was Contact Handled (CH) debris and solids and Remotely Handled (RH) debris and solids Summary Category Groups, represented by the following five waste streams:

- INL-001 CH solids stream ID-SDA-SOIL;
- INL-018 CH debris stream LL-M001-S5400;
- INL-018 CH solids stream LL-T004-S3141;
- INL-520 RH solids stream IDC-RTC-S3000; and
- INL-580 RH solids stream ID-HFEF-S5400-RH.

The INL-001 solids stream presented in the AK Summary Report CCP-AK-INL-001 R10, (February 16, 2011); INL-018 debris and solids streams presented in the AK Summary Report CCP-AK-INL-018 R1, (May 26, 2011); INL-520 solids stream presented in the AK Summary Report CCP-AK-INL-520 R2, (November 12, 2010); and INL-580 debris stream presented in the AK Summary Report CCP-AK-INL-580 R3, (January 27, 2011). Based on the original approval dates for these reports, all the waste streams were generated prior to implementation of new permit requirements, while the revised AK Summary Reports were generated after this date. The NMED observer compared these documents and related procedures against the new AK-related permit requirements, and developed waste stream specific matrices that identified both the new AK requirements. The technical specialist, NMED observer, and auditees worked together to review these matrices. The preliminary tables below present the identified deficiencies for each waste stream, final cross reference tables will be included as attachments to the revised AK Summary Reports that will be provided by CBFO in their report to NMED.

### Permit Requirement Cross Reference Table, Waste Stream INL-001

Requirement	Waste Stream	Page	Source documents	Procedure	Items to Address
C-0a: A waste stream is defined as waste materials that have common physical form, that contain similar hazardous constituents, and that are generated from a single process or activity	ID-SDA-SOIL	CCP-AK-INL-001, Rev. 10  Pages 64-66, Section 4.5  Pages 70-71 Sections 4.7.1, 4.7.2	N/A	CCP-TP-005 Revision 21, 12/29/10, Section 1.1	
Section C-1d: Generator/Storage sites will develop criteria to determine the specific circumstances under which a WSPF is revised versus when a new WSPF is required. These criteria will be evaluated by DOE during site audits.	ID-SDA-SOIL	See WSPF	N/A	CCP-TP-002 Revision 23 Section 4.7.3	
AKSD Notification Requirements (Section C-0b)	ID-SDA-SOIL	N/A	N/A	CCP-PO-001, Revision 19 (QAPjP) Section C-0b	
Attachment C4 (General) Removal of mandatory conservative HWN assignments (e.g. C4-3e)	ID-SDA-SOIL  Note: Conservative HWN discussion was removed in Rev. 10 of CCP-AK-INL-001.	N/A	N/A	CCP-TP-005, Revision 21, 12/29/10	
C4-2b:... Documentation regarding how the site has historically managed the waste, including the historical regulatory status of the waste (i.e., TRU mixed verses TRU non-mixed)	ID-SDA-SOIL  Note: This is a newly generated waste stream and hazardous waste numbers were assigned based on review of all AK related to the waste disposed in the ARP.	N/A	N/A	CCP-TP-005, Revision 21, 12/29/10, Attachment 1	
C4-2b:... Procedures that ensure the assignment of EPA hazardous waste numbers is appropriate, consistent with RCRA requirement and considers site historical waste	ID-SDA-SOIL	CCP-AK-INL-001, Rev. 10  Pages 96-189 Section 5.6	ARA-P009, ID-C101, ID-C102, ID-C107, ID-C112, ID-C201, ID-C223, ID-P091, ID-P097, ID-P103, ID-P104, ID-P105, ID-P108, ID-P109, ID-P111, ID-P122, ID-P124, ID-P239, ID-P242, ID-P250, ID-P253, ID-P269, ID-P271, ID-P276, ID-	CCP-TP-005, Revision 21, 12/29/10	

Requirement	Waste Stream	Page	Source documents	Procedure	Items to Address
management			P398, ID-P400, ID-U106, ID-U292, ID-U298, ID-U304, PER-P006, PER-P009, PER-P039, PER-P040, PER-P043, PER-P044, RF-C028, RF-C045, RF-C055, RF-C120, RF-C211, RF-C228, RF-C260, RF-C400, RF-C401, RF-C402, RF-C409, RF-C414, RF-C415, RF-C416, RF-C420, RF-D001, RF-P040, RF-P047, RF-P064, RF-P084, RF-P085, RF-P086, RF-P090, RF-P091, RF-P114, RF-P260, RF-P262, RF-P266, RF-P404, RF-P405, RF-P429, RF-P562, RF-U026, RF-U046, RF-U124, RF-U125, TAN-U002		
C4-2c: Assignment of HWN in accordance with RCRA and rationale for HWN determinations	ID-SDA-SOIL	CCP-AK-INL-001, Rev. 10  Pages 96-189 Section 5.6	ARA-P009, ID-C101, ID-C102, ID-C107, ID-C112, ID-C201, ID-C223, ID-P091, ID-P097, ID-P103, ID-P104, ID-P105, ID-P108, ID-P109, ID-P111, ID-P122, ID-P124, ID-P239, ID-P242, ID-P250, ID-P253, ID-P269, ID-P271, ID-P276, ID-P398, ID-P400, ID-U106, ID-U292, ID-U298, ID-U304, PER-P006, PER-P009, PER-P039, PER-P040, PER-P043, PER-P044, RF-C028, RF-C045, RF-C055, RF-C120, RF-C211, RF-C228, RF-C260, RF-C400, RF-C401, RF-C402, RF-C409, RF-C414, RF-C415, RF-C416, RF-C420, RF-D001, RF-P040, RF-P047, RF-P064, RF-P084, RF-P085, RF-P086, RF-P090, RF-P091, RF-P114, RF-P260, RF-P262, RF-P266, RF-P404, RF-P405, RF-P429, RF-P562, RF-U026, RF-U046, RF-U124, RF-U125, TAN-U002	CCP-TP-005, Revision 21, 12/29/10	
C4-2C: Analytical data relevant the waste steam...including other processes that collect information pertinent to the waste stream ... radiography screening for prohibited items.	ID-SDA-SOIL  Note: Source documents obtained from ID-SDA-SOIL Attachment 1.	CCP-AK-INL-001, Rev. 10  Pages 24-35 Section 4.1.2 Section 4.1.3  Pages 35-36 Section 4.3.2  Pages 50-63 Section 4.2  Pages 63-64 Section 4.4.3  Pages 66-67 Section 4.6.1  Page 69	ARA-P004, ID-P091, ID-P400, ID-U310, ID-U329, ID-U355, ID-U405, RF-C406, RF-P267	CCP-TP-005, Revision 21, 12/29/10, Attachment 1	

Requirement	Waste Stream	Page	Source documents	Procedure	Items to Address
		Section 4.7  Pages 87- 88 Section 5.4.4.2  Pages 91-94 Section 5.5.1  Page 186 Section 5.6.5  Page 191 Section 5.6.6			
C4-3b: ...Justify combining waste historically managed separately as TRU mixed and TRU non-mixed waste streams into a single waste stream.	ID-SDA-SOIL	N/A	N/A	CCP-TP-005, Revision 21, 12/29/10, Section 4.4.8	
C4-3b: ...All data examined to reach the hazardous waste number determination must be placed in the auditable record and must present a clear justification for the hazardous waste number analyses.	ID-SDA-SOIL	CCP-AK-INL-001, Rev. 10  Pages 96-189 Section 5.6	ARA-P009, ID-C101, ID-C102, ID-C107, ID-C112, ID-C201, ID-C223, ID-P091, ID-P097, ID-P103, ID-P104, ID-P105, ID-P108, ID-P109, ID-P111, ID-P122, ID-P124, ID-P239, ID-P242, ID-P250, ID-P253, ID-P269, ID-P271, ID-P276, ID-P398, ID-P400, ID-U106, ID-U292, ID-U298, ID-U304, PER-P006, PER-P009, PER-P039, PER-P040, PER-P043, PER-P044, RF-C028, RF-C045, RF-C055, RF-C120, RF-C211, RF-C228, RF-C260, RF-C400, RF-C401, RF-C402, RF-C409, RF-C414, RF-C415, RF-C416, RF-C420, RF-D001, RF-P040, RF-P047, RF-P064, RF-P084, RF-P085, RF-P086, RF-P090, RF-P091, RF-P114, RF-P260, RF-P262, RF-P266, RF-P404, RF-P405, RF-P429, RF-P562, RF-U026, RF-U046, RF-U124, RF-U125, TAN-U002	CCP-TP-005, Revision 21, 12/29/10	
C4-3e: Each site shall document, justify, and consistently delineate all generator-specific waste streams and hazardous waste number assignments. The site must also consider site-specific permit requirements and other state-enforced agreements in this analysis.	ID-SDA-SOIL	CCP-AK-INL-001, Rev. 10  Page 96 Section 5.6	ID-P091, ID-P104, ID-P108, ID-P109, ID-P124	CCP-TP-005, Revision 21, 12/29/10	

**Permit Requirement Cross Reference Table, Waste Stream INL-018/M001-S5400**

<b>Requirement</b>	<b>Waste Stream</b>	<b>Page</b>	<b>Source documents</b>	<b>Procedure</b>	<b>Items to Address</b>
C-0a: A waste stream is defined as waste materials that have common physical form, that contain similar hazardous constituents, and that are generated from a single process or activity.	ID-LL-M001-S5400  Note: Items to Address – Corrected in a freeze file change submitted to Document Services 6/9/2011.	CCP-AK-INL-018, Rev. 1  Pages 20-23, Section 4.2	N/A	CCP-TP-005 Rev 21, 12/29/10, Section 1.1	Section 4.5.3, 1 <sup>st</sup> sentence, last paragraph: change waste stream definition to match WIPP-WAP.
Section C-1d: Generator/Storage sites will develop criteria to determine the specific circumstances under which a WSPF is revised versus when a new WSPF is required. These criteria will be evaluated by DOE during site audits.	ID-LL-M001-S5400  Note: After Rev. 0 of INL-018 was issued and before the WSPF was approved, a freeze file change was initiated to change the waste stream number (from LL-M001-S5400 to ID-LL-M001-S5400). Upon issuance of the freeze file change, the WSPF was approved. This freeze file change was incorporated in Rev. 1. No change notices have been required for this waste stream.	See WSPF	N/A	CCP-TP-002 Rev 23 Section 4.7.3	
AKSD Notification Requirements (Section C-0b)	ID-LL-M001-S5400	N/A	N/A	CCP-PO-001, Rev 19 (QAPjP) Section C-0b	
Attachment C4 (General) Removal of mandatory conservative HWN assignments (e.g. C4-3e)	ID-LL-M001-S5400  Note: Conservative HWN discussion was removed in Rev. 1 of CCP-AK-INL-018.	N/A	N/A	CCP-TP-005, Rev 21, 12/29/10	
C4-2b: ...Documentation regarding how the site has historically managed the waste, including the historical	ID-LL-M001-S5400	CCP-AK-INL-018, Rev. 1  Pages 82-83,	D003, D004, C103, C017, C027, C055, C057, C071, C072, C073, C074, C087, P003, P008, P014, P016, P017, P020, P025, P034, P058, P066, U002, U003, U005, U007, U034	CCP-TP-005, Rev 21, 12/29/10, Attachment 1	

Requirement	Waste Stream	Page	Source documents	Procedure	Items to Address
regulatory status of the waste (i.e., TRU mixed versus TRU non-mixed)		Section 5.4.3			
C4-2b: ...Procedures that ensure the assignment of EPA hazardous waste numbers is appropriate, consistent with RCRA requirement and considers site historical waste management	ID-LL-M001-S5400	CCP-AK-INL-018, Rev. 1  Pages 81-100 Section 5.4.3	C001, C003, C005, C007, C015, C017, C018, C019, C020, C021, C022, C024, C025, C027, C029, C030, C032, C033, C036, C037, C038, C042, C048, C049, C051, C055, C056, C057, C058, C059, C060, C065, C067, C069, C071, C072, C074, C075, C076, C077, C080, C084, C085, C086, C087, C094, C102, C106, C107, C108, C114, C116, C117, C120, D003, D004, D005, D008, D021, P002, P003, P008, P014, P015, P016, P020, P034, P040, P058, P066, U001, U002, U003, U004, U005, U007, U010, U011, U012, U018, U019, U021, U024, U029	CCP-TP-005, Rev 21, 12/29/10	
C4-2c: Assignment of HWN in accordance with RCRA and rationale for HWN determinations	ID-LL-M001-S5400	CCP-AK-INL-018, Rev. 1  Pages 81-100 Section 5.4.3	C001, C003, C005, C007, C015, C017, C018, C019, C020, C021, C022, C024, C025, C027, C029, C030, C032, C033, C036, C037, C038, C042, C048, C049, C051, C055, C056, C057, C058, C059, C060, C065, C067, C069, C071, C072, C074, C075, C076, C077, C080, C084, C085, C086, C087, C094, C102, C106, C107, C108, C114, C116, C117, C120, D003, D004, D005, D008, D021, P002, P003, P008, P014, P015, P016, P020, P034, P040, P058, P066, U001, U002, U003, U004, U005, U007, U010, U011, U012, U018, U019, U021, U024, U029	CCP-TP-005, Rev 21, 12/29/10	
C4-2C: Analytical data relevant the waste stream. ...including other processes that collect information pertinent to the waste stream ... radiography screening for prohibited items.	ID-LL-M001-S5400  Note: Source documents obtained from ID-LL-M001-S5400 Attachment 1.	CCP-AK-INL-018, Rev. 1  Page 68-75 Section 4.5.2 Section 4.5.3  Pages 73-74 Section 5.4.1  Pages 75-76 Section 5.4.2	C023, C032, C103, P045	CCP-TP-005, Rev 21, 12/29/10, Attachment 1	
C4-3b: ...Justify combining waste historically managed separately as TRU mixed and TRU non-mixed waste streams into a single waste stream.	ID-LL-M001-S5400	N/A	N/A	CCP-TP-005, Rev 21, 12/29/10, Section 4.4.8	
C4-3b: ...All data examined to reach the hazardous waste number determination must be placed in the auditable record	ID-LL-M001-S5400	CCP-AK-INL-018, Rev. 1  Pages 81-100	C001, C003, C005, C007, C015, C017, C018, C019, C020, C021, C022, C024, C025, C027, C029, C030, C032, C033, C036, C037, C038, C042, C048, C049, C051, C055, C056, C057, C058, C059, C060, C065,	CCP-TP-005, Rev 21, 12/29/10	

Requirement	Waste Stream	Page	Source documents	Procedure	Items to Address
and must present a clear justification for the hazardous waste number analyses.		Section 5.4.3	C069, C071, C072, C074, C075, C076, C077, C080, C084, C085, C086, C087, C094, C102, C106, C107, C108, C114, C116, C117, C120, D003, D004, D008, D021, P002, P003, P008, P014, P015, P016, P020, P034, P040, P058, P066, U001, U002, U003, U004, U005, U007, U010, U011, U012, U019, U021, U024, U029		
C4-3e: Each site shall document, justify, and consistently delineate all generator-specific waste streams and hazardous waste number assignments. The site must also consider site-specific permit requirements and other state-enforced agreements in this analysis.	ID-LL-M001-S5400	CCP-AK-INL-018, Rev. 1  Pages 81-100 Section 5.4.3  Page 100 Section 5.4.3.5	C001, C003, C005, C007, C015, C017, C018, C019, C020, C021, C022, C024, C025, C027, C029, C030, C032, C033, C036, C037, C038, C042, C048, C049, C051, C055, C056, C057, C058, C059, C060, C065, C069, C071, C072, C074, C075, C076, C077, C080, C084, C085, C086, C087, C094, C102, C106, C107, C108, C114, C116, C117, C120, D003, D004, D008, D021, P002, P003, P008, P014, P015, P016, P020, P034, P040, P058, P066, U001, U002, U003, U004, U005, U007, U010, U011, U012, U019, U021, U024, U029, Reference 10	CCP-TP-005, Rev 21, 12/29/10	

**Permit Requirement Cross Reference Table, Waste Stream INL-018/ T004-S3141**

Requirement	Waste Stream	Page	Source documents	Procedure	Items to Address
C-0a: A waste stream is defined as waste materials that have common physical form, that contain similar hazardous constituents, and that are generated from a single process or activity	ID-LL-T004-S3141  Note: Items to Address – Corrected in a freeze file change submitted to Document Services 6/9/2011.	CCP-AK-INL-018, Rev. 1  Pages 20-23 Section 4.2	N/A	CCP-TP-005 Rev 21, 12/29/10, Section 1.1	Section 4.5.3, 1st sentence, last paragraph: change waste stream definition to match WIPP-WAP.
Section C-1d: Generator/Storage sites will develop criteria to determine the specific circumstances under which a WSPF is revised versus when a new WSPF is required. These criteria will be evaluated by DOE during site audits.	ID-LL-T004-S3151  Note: 2 freeze file changes were initiated: 1) change waste stream number (from LL-T004-S3141 to ID-LL-T004-S3141) and 2) add EPA HWN F005 (pyridine) to this waste stream. #1 was added prior to approval of WSPF for waste stream ID-LL-M001-S5400 (first waste stream characterized). #2 was added prior to approval of the WSPF for this waste stream. These freeze file changes were incorporated into Rev. 1 of INL-018. No change notices have been required for this waste stream.	See WSPF	N/A	CCP-TP-002 Rev 23 Section 4.7.3	
AKSD Notification Requirements (Section C-0b)	ID-LL-T004-S3141	N/A	N/A	CCP-PO-001, Rev 19 (QAPJP) Section C-0b	
Attachment C4 (General) Removal of mandatory	ID-LL-T004-S3141	N/A	N/A	CCP-TP-005, Rev 21, 12/29/10	

Requirement	Waste Stream	Page	Source documents	Procedure	Items to Address
conservative HWN assignments (e.g. C4-3e)	Note: This waste was originally non-mixed and no conservative discussion was included. When the waste stream was declared to be TRU mixed, the conservative hazardous waste discussion was not included in the narrative.				
C4-2b: ... Documentation regarding how the site has historically managed the waste, including the historical regulatory status of the waste (i.e., TRU mixed versus TRU non-mixed)	ID-LL-T004-S3141  LLNL's TRU program characterized this waste as non-hazardous. Based on historical waste management practices and a review of the AK for this waste stream, no hazardous waste numbers were assigned when the waste was generated and stored at LLNL or when it was shipped to the INL. However, solids sampling of Lot 1 of this waste stream indicates the UCL <sub>90</sub> for the mean concentration of pyridine is above the PRQL. Therefore, the waste stream will be managed as hazardous waste at the INL and for shipment to the WIPP and EPA hazardous waste number F005 has been assigned.	CCP-AK-INL-018, Rev. 1  Pages 132-133 Section 7.4.3	C013, C136, D023, P007, P010, P031, U002, U005, U007	CCP-TP-005, Rev 21, 12/29/10, Attachment 1	
C4-2b: ... Procedures that ensure the assignment of EPA hazardous waste numbers is appropriate, consistent with RCRA requirement and considers site historical waste management	ID-LL-T004-S3141	CCP-AK-INL-018, Rev. 1  Pages 132-137 Section 7.4.3	C136, D022, D023, P034, U001, U002, U003, U005, U009, U011	CCP-TP-005, Revision 21, 12/29/10	
C4-2c: Assignment of HWN in accordance with RCRA and rationale for HWN determinations	ID-LL-T004-S3141	CCP-AK-INL-018, Rev. 1  Pages 132-137 Section 7.4.3	C136, D022, D023, P034, U001, U002, U003, U005, U009, U011	CCP-TP-005, Revision 21, 12/29/10	
C4-2C: Analytical data relevant the waste steam ... including other processes that collect information pertinent to the waste stream ... radiography screening for prohibited items.	ID-LL-T004-S3141  Note: Source documents obtained from ID-LL-T004-S3141 Attachment 1.	CCP-AK-INL-018, Rev. 1  Page 70 Section 4.5.2.5  Page 127 Section 7.4.1  Page 128 Section 7.4.2  Pages 132-134 Section 7.4.3 Section 7.4.3.1	C023, C032, C103, D022, P045	CCP-TP-005, Revision 21, 12/29/10, Attachment 1	

Requirement	Waste Stream	Page	Source documents	Procedure	Items to Address
C4-3b: ...Justify combining waste historically managed separately as TRU mixed and TRU non-mixed waste streams into a single waste stream.	ID-LL-T004-S3141	N/A	N/A	CCP-TP-005, Revision 21, 12/29/10, Section 4.4.8	
C4-3b: ...All data examined to reach the hazardous waste number determination must be placed in the auditable record and must present a clear justification for the hazardous waste number analyses.	ID-LL-T004-S3141	CCP-AK-INL-018, Rev. 1  Pages 132-137 Section 7.4.3	C136, D022, D023, P034, U001, U002, U003, U005, U009, U011	CCP-TP-005, Revision 21, 12/29/10	
C4-3e: Each site shall document, justify, and consistently delineate all generator-specific waste streams and hazardous waste number assignments. The site must also consider site-specific permit requirements and other state-enforced agreements in this analysis.	ID-LL-T004-S3141	CCP-AK-INL-018, Rev. 1  Pages 132-137 Section 7.4.3  Page 137 Section 7.4.3.5	C136, D022, D023, P034, U001, U002, U003, U005, U009, U011	CCP-TP-005, Revision 21, 12/29/10	A freeze file change has been initiated for Section 7.4.3.5, California Hazardous Waste Numbers, as follows: <i>DTSC numbers are applicable to TRU mixed waste only. This waste stream has been historically managed as non-mixed at LLNL and, therefore, is not assigned a DTSC number as defined in Section 66261.126, Appendix XII of 22 CCR (Reference 10). Should the remaining drum at LLNL be shipped to INL, assignment of a DTSC number will be evaluated.</i>

**Permit Requirement Cross Reference Table, Waste Stream INL-520**

Requirement	Waste Stream	Page	Source Documents	Procedure	Items to Address
C-0a: A waste stream is defined as waste materials that have common physical form, that contain similar hazardous constituents, and that are generated from a single process or activity	ID-RTC-S3000	Freeze File to CCP-AK-INL-520 dated 6/8/11  Page 31 Section 4.2.4.		CCP-TP-005 Revision 21, 12/29/10, Section 1.1	
Section C-1d: Generator/Storage sites will develop criteria to determine the specific circumstances under which a WSPF is revised versus when a new WSPF is required. These criteria will be evaluated by DOE during site audits.	ID-RTC-S3000	See WSPF	N/A	CCP-TP-002 Revision 23 Section 4.7.3	

Requirement	Waste Stream	Page	Source Documents	Procedure	Items to Address
AKSD Notification Requirements (Section C-0b)	ID-RTC-S3000	N/A	N/A	CCP-PO-001, Revision 19 (QAPjP) Section C-0b	
Attachment C4 (General) Removal of mandatory conservative HWN assignments (e.g. C4-3e)	ID-RTC-S3000	Freeze File to CCP-AK-INL-520 dated 6/8/11  Page 13 Section 2  Page 31 Section 4.2.4  Page 36 Section 5.4.2  Pages 51-52 Sections 5.4.2.1 and 5.4.2.2.	N/A	CCP-TP-005, Revision 21, 12/29/10	
C4-2b...Documentation regarding how the site has historically managed the waste, including the historical regulatory status of the waste (i.e., TRU mixed verses TRU non-mixed)	ID-RTC-S3000	CCP-AK-INL-520 Rev. 2  Pages 36-37, Section 5.4.2  CCP-AK-INL-520 Freeze File dated 6/8/11  Page 36 Section 5.4.2	C015, C016, DR002, P009, P011, P017, U027, U130	CCP-TP-005, Revision 21, 12/29/10, Attachment 1	
C4-2b...Procedures that ensure the assignment of EPA hazardous waste numbers is appropriate, consistent with RCRA requirement and considers site historical waste management	ID-RTC-S3000	CCP-AK-INL-520 Rev.2  Pages 36-54, Section 5.4.2  CCP-AK-INL-520 Freeze File dated 6/8/11  Page 36 Section 5.4.2	C015, C016, C137, C155, DR002, P009, P011, P017, P027, P162, P202, P232, U001, U027, U130	CCP-TP-005, Revision 21, 12/29/10	
C4-2c: Assignment of HWN in accordance with RCRA and rationale for HWN determinations	ID-RTC-S3000	CCP-AK-INL-520 Rev.2  Pages 36-54 Section 5.4.2	C015, C016, C137, C155, DR002, P009, P011, P017, P027, P162, P202, P232, U001, U027, U130	CCP-TP-005, Revision 21, 12/29/10	
C4-2C: Analytical data relevant to the waste stream...including other processes that collect information pertinent to the waste stream ... radiography screening for prohibited items.	ID-RTC-S3000	CCP-AK-INL-520 Rev.2  Page 31 Section 4.2.4  Pages 37-38, 40-41, 44-45, 48, 51-52 Section 5.4.2	C015, C016, C104, C123, P011, P092, P236, U027, U115, U116, U117	CCP-TP-005, Revision 21, 12/29/10, Attachment 1	

Requirement	Waste Stream	Page	Source Documents	Procedure	Items to Address
		Page 54-58 Section 5.4.3  Page 59 Section 5.4.4			
C4-3b: ...Justify combining waste historically managed separately as TRU mixed and TRU non-mixed waste streams into a single waste stream.	ID-RTC-S3000	N/A	N/A	CCP-TP-005, Revision 21, 12/29/10, Section 4.4.8	
C4-3b: ...All data examined to reach the hazardous waste number determination must be placed in the auditable record and must present a clear justification for the hazardous waste number analyses.	ID-RTC-S3000	CCP-AK-INL-520 Rev.2  Pages 36-54 Section 5.4.2,	C015, C016, C137, C155, DR002, P009, P011, P017, P027, P162, P202, P232, U001, U027, U130	CCP-TP-005, Revision 21, 12/29/10	
C4-3e: Each site shall document, justify, and consistently delineate all generator-specific waste streams and hazardous waste number assignments. The site must also consider site-specific permit requirements and other state-enforced agreements in this analysis.	ID-RTC-S3000  Note: No state enforced agreements	N/A	N/A	CCP-TP-005, Revision 21, 12/29/10	

**Permit Requirement Cross Reference Table, Waste Stream INL-580**

Requirement	Waste Stream	Page	Source Documents	Procedure	Items to Address
C-0a: A waste stream is defined as waste materials that have common physical form, that contain similar hazardous constituents, and that are generated from a single process or activity	ID-HFEF-S5400-RH	CCP-AK-INL-580 Rev. 3  Pages 37-38, Section 4.2.2	N/A	CCP-TP-005 Revision 21, 12/29/10, Section 1.1	
Section C-1d: Generator/Storage sites will develop criteria to determine the specific circumstances under which a WSPF is revised versus when a new WSPF is required. These criteria will be evaluated by	ID-HFEF-S5400-RH	See WSPF	N/A	CCP-TP-002 Revision 23 Section 4.7.3	

Requirement	Waste Stream	Page	Source Documents	Procedure	Items to Address
DOE during site audits.					
AKSD Notification Requirements (Section C-0b)	ID-HFEF-S5400-RH	N/A	N/A	CCP-PO-001, Revision 19 (QAPjP) Section C-0b	
Attachment C4 (General) Removal of mandatory conservative HWN assignments (e.g. C4-3e)	ID-HFEF-S5400-RH Note: Conservative HWN discussion removed in revision 3 of CCP-AK-INL-580.	N/A	N/A	CCP-TP-005, Revision 21, 12/29/10	
C4-2b: ...Documentation regarding how the site has historically managed the waste, including the historical regulatory status of the waste (i.e., TRU mixed verses TRU non-mixed)	ID-HFEF-S5400-RH	CCP-AK-INL-580 Rev. 3  Pages 25-26, Section 4.2  Pages 43-44, Section 5.4.2	C096, C119, C129, C214, DR003, P035, P037, P060, P063, P091, U483, U484, U541, U552	CCP-TP-005, Revision 21, 12/29/10, Attachment 1	
C4-2b: ...Procedures that ensure the assignment of EPA hazardous waste numbers is appropriate, consistent with RCRA requirement and considers site historical waste management	ID-HFEF-S5400-RH	CCP-AK-INL-580 Rev. 3  Pages 43-56, Section 5.4.2	C002, C005, C014, C037, C072, C074, C126, C131, C134, C142, C148, C372, C465, C502, DR003, P006, P011, P019, P023, P029, P035, P036, P037, P039, P040, P042, P043, P060, P063, P070, P073, P075, P088, P089, P091, P144, P146, P180, P181, P182, P186, P221, P240, P245, P249, P250, P253, P278, P307, P308, P309, P310, P311, P317, P325, P384, P397, P4086, U001, U043, U080, U081, U132, U161, U183, U184, U223, U224, U229, U230, U231, U232, U233, U234, U235, U236, U239, U483, U484, U541, U552, U645, U646, U647, U4033	CCP-TP-005, Revision 21, 12/29/10	
C4-2c: Assignment of HWN in accordance with RCRA and rationale for HWN determinations	ID-HFEF-S5400-RH	CCP-AK-INL-580 Rev. 3  Pages 43-56, Section 5.4.2	C002, C005, C014, C037, C072, C074, C126, C131, C134, C142, C148, C372, C465, C502, DR003, P006, P011, P019, P023, P029, P035, P036, P037, P039, P040, P042, P043, P060, P063, P070, P073, P075, P088, P089, P091, P144, P146, P180, P181, P182, P186, P221, P240, P245, P249, P250, P253, P278, P307, P308, P309, P310, P311, P317, P325, P384, P397, P4086, U001, U043, U080, U081, U132, U161, U183, U184, U223, U224, U229, U230, U231, U232, U233, U234, U235, U236, U239, U483, U484, U541, U552, U645, U646, U647, U4033	CCP-TP-005, Revision 21, 12/29/10	
C4-2C: Analytical data relevant the waste stream...including other processes that collect information pertinent to the waste stream ... radiography	ID-HFEF-S5400-RH	N/A	N/A	CCP-TP-005, Revision 21, 12/29/10, Attachment 1	

Requirement	Waste Stream	Page	Source Documents	Procedure	Items to Address
screening for prohibited items.					
C4-3b: ...Justify combining waste historically managed separately as TRU mixed and TRU non-mixed waste streams into a single waste stream.	ID-HFEF-S5400-RH	N/A	N/A	CCP-TP-005, Revision 21, 12/29/10, Section 4.4.8	
C4-3b: ...All data examined to reach the hazardous waste number determination must be placed in the auditable record and must present a clear justification for the hazardous waste number analyses.	ID-HFEF-S5400-RH	CCP-AK-INL-580 Rev. 3  Pages 43-56, Section 5.4.2	C002, C005, C014, C037, C072, C074, C126, C131, C134, C142, C148, C372, C465, C502, DR003, P006, P011, P019, P023, P029, P035, P036, P037, P039, P040, P042, P043, P060, P063, P070, P073, P075, P088, P089, P091, P144, P146, P180, P181, P182, P186, P221, P240, P245, P249, P250, P253, P278, P307, P308, P309, P310, P311, P317, P325, P384, P397, P4086, U001, U043, U080, U081, U132, U161, U183, U184, U223, U224, U229, U230, U231, U232, U233, U234, U235, U236, U239, U483, U484, U541, U552, U645, U646, U647, U4033	CCP-TP-005, Revision 21, 12/29/10	
C4-3e: Each site shall document, justify, and consistently delineate all generator-specific waste streams and hazardous waste number assignments. The site must also consider site-specific permit requirements and other state-enforced agreements in this analysis.	ID-HFEF-S5400-RH	CCP-AK-INL-580 Rev. 3  Pages 43-56, Section 5.4.2	C002, C005, C014, C037, C072, C074, C126, C131, C134, C142, C148, C372, C465, C502, DR003, P006, P011, P019, P023, P029, P035, P036, P037, P039, P040, P042, P043, P060, P063, P070, P073, P075, P088, P089, P091, P144, P146, P180, P181, P182, P186, P221, P240, P245, P249, P250, P253, P278, P307, P308, P309, P310, P311, P317, P325, P384, P397, P4086, U001, U043, U080, U081, U132, U161, U183, U184, U223, U224, U229, U230, U231, U232, U233, U234, U235, U236, U239, U483, U484, U541, U552, U645, U646, U647, U4033	CCP-TP-005, Revision 21, 12/29/10	

The NMED observer worked with the AK Technical Specialists and AK QA to identify AK questions provided to INL-CCP as Audit Recommendations. The issues identified were:

- The waste stream definitions in INL-018 should be to match WIPP-WAP.
- The original assignment of California Hazardous Waste Numbers in INL-018 will be modified as follows: *DTSC numbers are applicable to TRU mixed waste only. This waste stream has been historically managed as non-mixed at LLNL and, therefore, is not assigned a DTSC number as defined in Section 66261.126, Appendix XII of 22 CCR (Reference 10). Should the remaining drum at LLNL be shipped to INL, assignment of a DTSC number will be evaluated.*

These issues were among those presented in recommendations to CCP; the modifications necessary to meet new permit requirements were presented in freeze file modifications to the waste streams that will be submitted to NMED in the final report.

Note that freeze file modifications were developed to address issues presented in Attachment A. The AK Technical Specialists were provided all of this information and included the deficiencies in a recommendation to CCP, which is included in Attachment B. The following additional concerns were identified by the AK Audit Team and are presented in Attachment B:

- Page 1 of Source Document D024 (1/20/2011) had “ID-LL-T004-S3141” as the waste stream number. The correct waste stream numbers should be “ID-LL-M001-S5400, ID-LL-W019-S3900.” The rest of D024 used the correct waste stream number and this concern was corrected during the audit.
- The following errors were found in the AK Summary Report CCP-AK-INL-018 R1:
  - The map of the Livermore site which should show the location of applicable buildings generating, treating or storing TRU waste is not legible.
  - The potential application of California HWNs was not considered for waste stream ID-LL-T004-S3141 as noted in CCP-AK-INL-018, S7.4.3.5.
  - The prohibited items that may be present in waste stream ID-LL-T004-S3141 are not identified in the AK Summary for this waste stream S7.4.4 nor are they listed in AK attachment 6.

These items were corrected during the audit.

- It is recommended that the following changes/additions be made to AK Summary Reports for CCP-AK-INL-001, Rev. 10; CCP-AK-INL-018, Rev. 1; CCP-AK-INL-520, Rev. 2; CCP-AK-INL-580, Rev. 3 for clarification:
  - In CCP-AK-INL-018, add additional chemicals identified in the process description section to the chemical list in Table 7;
  - Modify the reactivity discussion in CCP-AK-INL-018 and CCP-AK-INL-580 for the S5400 debris streams to indicate the potential for cyanides in the waste stream;
  - Modify attachment 5 in CCP-AK-INL-018 for S3141 to indicate that n-butanol is an expected hazardous constituent;

- Modify attachment 6 in CCP-AK-INL-018 for S5400 to reflect the potential for prohibited items listed in the AK Summary;
  - Modify attachment 5 in CCP-AK-INL-001 for the soils stream to indicate that several chemicals that are listed in the chemical table should be marked as expected in the waste stream;
  - Modify attachment 6 for the RH debris stream in CCP-AK-INL-580 for potential prohibited items to align with the prohibited items section of the AK Summary Report;
  - Remove tetrachloroethylene from Table 3, Hazardous Waste Characterization Summary , of CCP-AK-INL-520 for waste stream ID-RTC-S3000. It is not supported by the AK record. This is already included in an open CCP freeze file; and
  - Section 4.1.2.1 of the AK Summary CCP-AK-INL-001 indicates that EBR-II (Building ANL-W-767) was designed to demonstrate a complete operational breeder reactor power plant with on-site reprocessing of metallic fuel (in the Fuel Cycle Facility, ANL-W-765). Suggest clarifying in Section 4.3.2.1 to indicate that no fuel reprocessing wastes from ANL-W-765 is in these waste streams.
- AK records are not being processed into the CCP records system. For example, the auditor requested the CCP Records Manager to verify that the source documents listed on Attachment 4 for selected waste streams were in the hard copy CCP Records files. Below are the results:
    - Waste Stream ID-SDA-SOIL (CCP-AK-INL-001)
      - Approximately 20 source documents and their associated Attachment 3s were missing from CCP Records
    - Waste Stream ID-RTC-S5400 (CCP-AK-INL-520)
      - Approximately 12 source documents and their associated Attachment 3s were missing from CCP Records
    - Waste Stream ID-LL-M001-S5400 (CCP-AK-INL-018)
      - Approximately 26 source documents were missing from CCP Records. Approximately 9 of 258 Attachment 3s were present in CCP Records.
    - Waste Stream ID-LL-T004-S3141 (CCP-AK-INL-018)
      - Approximately 20 source documents were missing from CCP Records. Approximately 3 of 252 Attachment 3s were present in CCP Records.
    - Waste Stream ID-HFEF-S5400-RH (CCP-AK-INL-580)
      - There were approximately 207 source documents and their associated Attachment 3's missing from CCP Records.

This concern was classified as a Finding.

- CCP-QP-002, CCP Training and Qualification Plan, Section 4.3.1[A.6] requires CCP AK personnel qualified in the RH Waste Program must be proficient in understanding the DOE/WIPP 02-3214, Remote-Handled TRU Waste Certification Program Implementation Plan. There is no evidence this has been accomplished for two AKE personnel. This concern was classified as a Finding.

Attachment C is a list of references provided by CCP in support of this audit.

**ATTACHMENT A  
FREEZE FILE CHANGES**

**Freeze File Change for CCP-AK-INL-001, Rev. 10**

None.

**Freeze File Changes for CCP-AK-INL-018, Rev. 1**

Page 85      Section 4.5.3, 1st sentence, last paragraph: change waste stream definition to match WIPP-WAP.

Page 137      The text for Section 7.4.3.5, California Hazardous Waste Numbers, will be modified as follows: *DTSC numbers are applicable to TRU mixed waste only. This waste stream has been historically managed as non-mixed at LLNL and, therefore, is not assigned a DTSC number as defined in Section 66261.126, Appendix XII of 22 CCR (Reference 10). Should the remaining drum at LLNL be shipped to INL, assignment of a DTSC number will be evaluated.*

**Freeze File Changes for CCP-AK-INL-520, Rev. 2**

None.

**Freeze File Changes for CCP-AK-INL-580, Rev. 3**

None.

## ATTACHMENT B AUDIT CONCERNS

No	Who	Description of Concern	Requirements Comments
1	Walsh	Block 19a for NCR-INL-0550-10 is checked "Reject" while disposition instructions in Block 19b is for "Rework" and instructions for completion of final disposition is marked "N/A" for "Reject."	CCP-QP-005, Rev. 20, Sections 4.4.5 and 4.4.8  (CDA #1)
2	Frank/Blauvelt	Source Document D024 (1/20/2011) page 1 had "ID-LL-T004-S3141" as the waste stream number. The correct numbers should be "ID-LL-M001-S5400, ID-LL-W019-S3900." The rest of D024 used the correct waste stream number	CCP-TP-005, Rev. 22, Section 4.3.4  (CDA #2)
3	Frank/Blauvelt	<p>It is recommended that the following changes/additions be made to AK Summary CCP-AK-INL-018, Rev. 1 and ID-SDA-SOIL, Rev. 10 (CCP-AK-INL-001) for clarification.</p> <ul style="list-style-type: none"> <li>• In 018, add additional chemicals identified in the process description section to the chemical list in table 7</li> <li>• Modify the reactivity discussion in 018 and 580 for the S5400 debris streams to indicate the potential for cyanides in the waste stream</li> <li>• Modify attachment 5 in 018 for S3141 to indicate that n-butanol is an expected hazardous constituent</li> <li>• Modify attachment 6 in 018 for S5400 to reflect the potential for prohibited items listed in the AK Summary</li> <li>• Modify attachment 5 in 001 for the soils stream to indicate that several chemicals that are listed in the chemical table should be marked as expected in the waste stream</li> <li>• Modify attachment 6 for the RH debris stream in CCP-AK-INL-580 for potential prohibited items to align with the prohibited items section of the AK Summary Report</li> <li>• Remove tetrachloroethylene from table 3, waste stream ID-RTC-S3000 Hazardous Waste Characterization Summary. It is not supported by the AK record. This is already included in an open CCP freeze file</li> <li>• Section 4.1.2.1 of the AK Summary CCP-AK-INL-001 indicates that EBR-II (Building ANL-W-767) was designed to demonstrate a complete operational breeder reactor power plant with on-site reprocessing of metallic fuel (in the Fuel Cycle Facility, ANL-W-765). Suggest clarifying in Section 4.3.2.1 to indicate that no fuel reprocessing wastes from ANL-W-765 is in these waste streams.</li> </ul>	Recommendation for clarification or consistency.  (Recommendation #1)
4	Frank/Blauvelt	It is recommended that freeze file changes as applicable be made to the AK Summaries for the waste streams examined during this audit to address the permit modifications dealing with Acceptable Knowledge. These changes are noted on the NMED matrix and will be attached to the AK Summaries submitted with the final report and were discussed with and concurred by the audit participants.	(Recommendation #2)

*The information contained on this form is preliminary. All concerns are subject to final review and validation by the Carlsbad Field Office.*

No	Who	Description of Concern	Requirements Comments
5	Frank/Blauvelt	<ul style="list-style-type: none"> <li>• In CCP-AK-INL-018 R1, the map of the Livermore site which should show the location of applicable buildings generating, treating or storing TRU waste is not legible.</li> <li>• The potential application of California HWNs was not considered for waste stream ID-LL-T004-S3141 as noted in CCP-AK-INL-018, S7.4.3.5.</li> <li>• The prohibited items that may be present in waste stream ID-LL-T004-S3141 are not identified in the AK Summary for this waste stream S7.4.4 nor are they listed in AK attachment 6.</li> </ul>	<p>CCP-TP-005, Rev. 22, Section 4.2.2, Att. 1 (PR1)</p> <p>CCP-TP-005, Rev. 22, Section 4.8</p> <p>CCP-TP-005, Rev. 22, Sections 4.4.28(A) and 4.4.34(K)</p> <p><b>(CDA #3)</b></p>
6	Knox/Verret	BDR INHSG1105, Attachment 2, Page 2, Permit required equilibrium time (days) and container age (days) are incorrect. The data appears to be transposed. Permit required equilibrium time listed should be container age and listed container age should be permit required equilibrium time. Data appears to be correct but transposed.	<p>CCP-TP-093, Rev. 15, Sections 4.3.1.a.16 and A.17</p> <p><b>(CDA #4)</b></p>
7	Frank	<p>AK records are not being processed into the CCP records system. For example, the auditor requested the CCP Records Manager to verify that the source documents listed on Attachment 4 for selected waste streams were in the hard copy CCP Records files. Below are the results:</p> <ul style="list-style-type: none"> <li>- Waste Stream ID-SDA-SOIL (CCP-AK-INL-001) <ul style="list-style-type: none"> <li>o Approximately 20 source documents and their associated Attachment 3s were missing from CCP Records</li> </ul> </li> <li>- Waste Stream ID-RTC-S5400 (CCP-AK-INL-520) <ul style="list-style-type: none"> <li>o Approximately 12 source documents and their associated Attachment 3s were missing from CCP Records</li> </ul> </li> <li>- Waste Stream ID-LL-M001-S5400 (CCP-AK-INL-018) <ul style="list-style-type: none"> <li>o Approximately 26 source documents were missing from CCP Records. Approximately 9 of 258 Attachment 3s were present in CCP Records.</li> </ul> </li> <li>- Waste Stream ID-LL-T004-S3141 (CCP-AK-INL-018) <ul style="list-style-type: none"> <li>o Approximately 20 source documents were missing from CCP Records. Approximately 3 of 252 Attachment 3s were present in CCP Records.</li> </ul> </li> <li>- Waste Stream ID-HFEF-S5400-RH (CCP-AK-INL-580) <ul style="list-style-type: none"> <li>o There were approximately 207 source documents and their associated Attachment 3s missing from CCP Records.</li> </ul> </li> </ul>	<p>CCP-TP-005, Rev. 22, Section 4.4.38</p> <p><b>(Probable CAR #1)</b></p>
8	Walsh	CCP-QP-002, CCP Training and Qualification Plan, Section 4.3.1[A.6] requires CCP AK personnel qualified in the RH Waste Program must be proficient in understanding the DOE/WIPP 02-3214, Remote-Handled TRU Waste Certification Program Implementation Plan. There is no evidence this has been accomplished for two AKE personnel.	<p>CCP-QP-002, Rev. 31, Section 4.3.1[A.6]</p> <p><b>(Probable CAR #2)</b></p>

*The information contained on this form is preliminary. All concerns are subject to final review and validation by the Carlsbad Field Office.*

No	Who	Description of Concern	Requirements Comments
9	Roberts	<p>CCP-PO-002, Rev. 25, "CCP Transuranic Waste Certification Plan," Section 5.3, "QUALITY IMPROVEMENT" page 89, 2<sup>nd</sup> full paragraph, indicates CBFO will be notified of non-administrative changes within 5 days of identification instead of 7 days currently observed.</p> <p>CCP-PO-002 also makes several references to WCPIP Attachments that do not exist in WCPIP, DOE/WIPP-02-3214, Rev. 2. An example of a reference to a WCPIP attachment is found in Section 11.5.1 "Acceptable Knowledge"</p> <p>NOTE: CCP-QP-005, Rev. 20, "CCP TRU Nonconforming Item Reporting and Control" correctly uses the 7 day requirement in Section 2.4.1.</p>	<p>CBFO QAPD, Rev. 11, Section 1.3.2.3</p> <p><b>(Observation #1)</b></p>
10	Gomez	<p>The SPM checklists for "Description of Criteria Reviewed #26" of BDRs ECL10022M, ECL10024M, ECL10034M, and ECL10031M, was answered N/A for a criteria that must be available and verified to have passed its limit criteria.</p>	<p>CCP-TP-001, Rev. 19, Section 4.2.8</p> <p><b>(Uncategorized Concern #1)</b></p>
11	Gomez	<p>The Independent Technical Review Checklist in BDR ALD10041V is not complete for Requirement (11) Batch Data Report Completeness item h.</p>	<p>CCP-TP-001, Rev. 19, Section 4.2.5</p> <p><b>(CDA #5)</b></p>
12	Martinez/Castillo	<p>Container types on BDR INRTR5100028 for waste containers LL85101565TRU and LL85401615 were recorded as 55 Gallon Drums rather than 55 Gallon Galv. Drums. The drums were correctly identified in the audio/video as 55 gallon galvanized drums and the correct weights were assigned based on Operator Aid: CCP-INL-057; 24.2 Kg for 55 gallon galvanized drums vs. 27.2 Kg for 55 gallon drum (Rocky Flats White Painted).</p>	<p>CCP-TP-053, Rev. 10, section 4.4.2[D]</p> <p>"Record the following data in section 2: Waste Container Data, of Attachment 2: [D.1] Container Type."</p> <p><b>(CDA #6)</b></p>
13	Martin	<p>During review of VE Operational Logbooks, it was noted that visitors to the Airlocks are not being recorded in logbooks. It is recommended that visitors and operators be recorded in logbooks to make event and history reconstruction possible.</p>	<p>CCP-PO-005, Rev. 21, Section 12.2</p> <p>Recommendation based on CCP-PO-005, Section 12.2, that states "Other daily entries COULD include information such as:</p> <ul style="list-style-type: none"> <li>• Equipment startup and shut down times,</li> <li>• Equipment deficiencies</li> <li>• Lockout/tagout information,</li> <li>• VISITORS</li> </ul> <p><b>(Recommendation #3)</b></p>
14	Bradford/Martin	<p>VE Operation training qualification requirement of every two years was not met. The operator expired on 06/02/11 and was continuing to work as a VE on 06/07/11. The operators use the LOQI to check current qualification.</p>	<p>CCP-QP-002, Section 4.1.2[F] and C3-4b</p> <p><b>(Uncategorized Concern #2)</b></p>

*The information contained on this form is preliminary. All concerns are subject to final review and validation by the Carlsbad Field Office.*

## **ATTACHMENT C REFERENCES**

CCP-AK-INL-001, Central Characterization Project Acceptable Knowledge Summary Report For Waste Retrieved From Designated Areas Within the Subsurface Disposal Area at the Idaho National Laboratory, Waste Streams: ID-SDA-SLUDGE, ID-SDA-DEBRIS, ID-SDA-SOIL, Revision 10, February 16, 2011

CCP-AK-INL-018, Central Characterization Project Acceptable Knowledge Summary Report For Idaho National Laboratory Lawrence Livermore National Laboratory Waste Streams, Waste Streams: ID-LL-M001-S5400, ID-LL-W019-S3900, ID-LL-T004-S3141, Revision 1, May 26, 2011

CCP-AK-INL-520, Central Characterization Project Acceptable Knowledge Summary Report For Remote-Handled Transuranic Sludge Waste from Reactor Technology Complex at Idaho National Laboratory, Waste Stream: ID-RTC-S3000, Revision 2, November 12, 2010

CCP-AK-INL-580, Central Characterization Project Acceptable Knowledge Summary Report For Remote-Handled Transuranic Debris Waste from Materials and Fuels Complex Hot Fuel Examination Facility at Idaho National Laboratory, Waste Stream: ID-HFEF-S5400-RH, Revision 3, January 11, 2011

Approved WSPF for ID-SDA-SOIL, June 19, 2008

Approved WSPF for ID-LL-M001-S5400, January 5, 2011

Approved WSPF for ID-LL-T004-S3141, February 9, 2011

Approved WSPF for ID-RTC-S3000, May 25, 2011

Approved WSPF for ID-HFEF-S5400-RH, February, 23, 2010

CCP TP 005 Attachments 1, 4, 5, 6 and 8 for INL-001 waste stream ID- SDA-SOIL

CCP TP 005 Attachments 1, 4, 5, 6 and 8 for INL-018 waste streams ID-LL-M001-S5400 and ID-LL-T004-S3141

CCP TP 005 Attachments 1, 4, 5, 6 and 8 for INL-520 waste stream ID-RTC-S3000

CCP TP 005 Attachments 1, 4, 5, 6 and 8 for INL-580 waste stream ID-HFEF-S5400-RH

Characterization Checklists for Waste Stream INL-001 Lots 45 and 48, August 11, 2010 and August 26, 2010

Characterization Checklists for Waste Stream INL-018/M001-S5400 Lots 1-5, December 29, 2010 through January 27, 2011

Characterization Checklist for Waste Stream INL-018/ T004-S3141 Lot 1, February 17, 2011

Characterization Checklist for Waste Stream INL-520 Lot 1, December 17, 2010

Acceptable Knowledge Accuracy Reports for Idaho National Laboratory Waste Stream INL-001, April 30, 2009; April 15, 2010; and May 26, 2011

Acceptable Knowledge Accuracy Reports for Idaho National Laboratory Waste Stream INL-018, May 27, 2011; June 2, 2011

Acceptable Knowledge Accuracy Reports for Idaho National Laboratory Waste Stream INL-580, May 25, 2010

Headspace Gas Random Sample Selection Memos for Waste Stream INL-018/ M001-S5400 Lot 1; Lot 1 rev. 1; and Lot 1, rev. 2, July 7, 2010 through December 13, 2010

Headspace Gas Random Sample Selection Memos for Waste Stream INL-580 Lot 1; Lot 2; Lot 3; Lot 4; and Lot 5, June 24, 2009 through October 19, 2010

Solids Random Sample Selection Memos for Waste Stream INL-001 Lot 1; Lot 2; Lot 3; Lot 4; and Lot 5, January 10, 2007 through August 12, 2010

Solids Random Sample Selection Memo for Waste Stream INL-520 Lot 1, June 4, 2008

Central Characterization Project Idaho National Laboratory Discrepancy Reports for Waste Stream INL-001: ID-D001, ID-D002, and RF-D001, April 25, 2005 through April 13, 2006

Central Characterization Project Idaho National Laboratory Discrepancy Reports for Waste Stream INL-018: D001-D008 and D020-D025, January 27, 2011 through February 14, 2011

Central Characterization Project Idaho National Laboratory Discrepancy Reports for Waste Stream INL-520: DR002 and DR004, October 2, 2007 through May 27, 2010

Central Characterization Project Idaho National Laboratory Discrepancy Reports for Waste Stream INL-580: DR003 and DR004, October 22, 2007

HSG Summary Report for INL-018: Lot 1, March 7, 2011

HSG Summary Reports INL-580: Lot 1 HSG, Lot 10 HSG, Lot 11 HSG, Lot 12 HSG, Lot 13, June 14, 2010 through December 17, 2010

Solids Summary Reports INL-001: Lot 1 Solids, Lot 2 Solids, Lot 4, May 20, 2009 to April 19, 2011

Solids Summary Report INL-018: Lot 1, March 7, 2011

Solids Summary Reports INL-520: Lot 1, June 2, 2011

Central Characterization Project Idaho National Laboratory Surveillance Report SUR-INL-0001-11;  
Container Management, January 25, 2011

Central Characterization Project Idaho National Laboratory Surveillance Report SUR-INL-0002-11;  
RH Packaging, March 7, 2011

Central Characterization Project Idaho National Laboratory Surveillance Report SUR-INL-0003-11;  
TRUPACT II Loading, April 12, 2011

Central Characterization Project Idaho National Laboratory Surveillance Report SUR-INL-0004-11;  
CH RTR, April 26, 2011

Central Characterization Project Idaho National Laboratory Surveillance Report SUR-INL-0005-11;  
RH VE, May 25, 2011

**List of Source Documents Requested and Provided:**

INL-001: ID-C101, ID-C113, ID-C114, ID-C115, FRF-C096

INL-001: ID-P249, ID-P253, ID-P399, ID-P421, ID-P422, ID-P424

INL-001: ID-U349, ID-U351, ID-U354, ID-U382, ID-U383

INL-018: C001-005, C007, C009, C010, C014-017, C020, C023, C030, C032, C038, C060,  
C086, C087, C100, C103-105, C111-113, C129

INL-018: D001-008

INL-018: P001, P002, P006, P008-P010, P014-016, P020-025, P030, P034, P036, P065, P066,  
P068, P074, P075

INL-018: U002, U003, U005, U007, U011, U012, U015, U027, U034

INL-520: U043

INL-580: C002, C004, C005, C037, C074, C096, C119, C126, C129, C214, C463, C464, C465,  
C501, C522, C698, C4095, C4100

INL-580: P001, P006, P018, P035-037, P042, P047, P049, P051, P060, P067, P070, P091, P186,  
P221, P245, P254, P4086

INL-580: U043, U190, U231-233, U483, U552

**Latest version of the complete reference list Attachment 4 for each of the waste streams are also provided with this memorandum.**