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NEW MEXICO
ENVIRONMENT DEPARTMENT



Hazardous Waste Bureau

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DAVE MARTIN
Secretary

RAJ SOLOMON, P.E.
Deputy Secretary

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

July 20, 2011

Edward Ziemianski, Acting Manager
Carlsbad Field Office
Department of Energy
P.O. Box 3100
Carlsbad, New Mexico 88221-3100

Farok Sharif, President
Washington TRU Solutions LLC
P.O. Box 2078
Carlsbad, New Mexico 88221-5608

**RE: NMED APPROVAL OF THE HANFORD SITE/CENTRAL CHARACTERIZATION PROJECT
FINAL AUDIT REPORT, AUDIT A-11-10
WASTE ISOLATION PILOT PLANT
EPA I.D. NUMBER NM4890139088**

Dear Messrs. Ziemianski and Sharif:

On June 22, 2011, the New Mexico Environment Department (NMED) received the Final Audit Report of the Hanford Site/Central Characterization Project (**Hanford/CCP**) Audit Number A-11-10 (**Audit Report**), from the Department of Energy's Carlsbad Field Office (**CBFO**). CBFO and Washington TRU Solutions LLC (**the Permittees**) were required to submit this Audit Report under the Waste Isolation Pilot Plant (**WIPP**) Hazardous Waste Facility Permit as specified in Permit Section 2.3.2.3. The intended scope of this annual recertification audit was to ensure the continued adequacy, implementation, and effectiveness of the Hanford/CCP waste characterization processes for retrievably stored contact handled (**CH**) Summary Category Groups (SCGs) S3000 homogeneous solids and S5000 debris wastes, relative to the requirements of the WIPP Permit.

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The Audit Report consisted of the following items:

- A narrative report (hardcopy and electronic)
- Completed copies of relevant Permit Attachment C6 checklists (hardcopy and electronic)
- Final Hanford/CCP standard operating procedures for characterization of the waste categories listed above (hardcopy and electronic)
- Two corrective action reports
- Two items corrected during the audit
- Four recommendations that could improve the program
- Objective evidence examined during the audit:
 - General information
 - Solids sampling
 - Acceptable knowledge
 - Headspace gas sampling
 - Real time radiography
 - Visual examination

NMED representatives observed the Hanford/CCP audit on April 5-7, 2011. NMED has examined the Audit Report for evidence of compliance with the requirements of Permit Sections 2.3.2 (Audit and Surveillance Program) and 2.3.1 (Waste Analysis Plan [WAP]). The Audit Report indicates there were:

- Two conditions adverse to quality resulting in the issuance of two corrective action reports
- Two deficiencies requiring only remedial actions that were corrected during the audit; and
- Four recommendations identifying opportunities for improvement.

Attached are NMED's general comments based upon observation of the audit and review of the Audit Report. These are provided to guide future audit report preparation and to assist the Permittees in understanding NMED's concerns. NMED requests that the Permittees correct the items listed in the attachment and return them, indicating revisions to any text in the Audit Report and checklists with redline/strikeout annotation. This will ensure the administrative record contains a complete and accurate Audit Report.

NMED concludes that this Audit Report demonstrates that Hanford/CCP has implemented the applicable characterization requirements of the WAP. Therefore, NMED approves the Permittees' Final Audit Report for Hanford/CCP Audit A-11-10 for the recertification of retrievably stored CH debris and homogeneous solids waste and amends the previous Audit Report approval for Audit A-10-07, the initial certification audit, issued by NMED on September 10, 2010 to include CH S3000 and S5000 wastes and processes evaluated by this recertification audit.

This Audit Report approval is of the broad programmatic implementation of waste characterization requirements at the generator/storage site, and does not constitute approval of

Messrs. Ziemiński and Sh

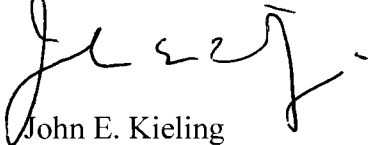
July 20, 2011

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individual waste characterization procedures, nor condone inappropriate applications of those procedures. This approval does not relieve CBFO and Washington TRU Solutions LLC of their obligation to comply with the requirements of the permit or other applicable laws and regulations.

If you have any questions regarding this matter, please contact Steve Holmes at (505) 476-6047.

Sincerely,



John E. Kieling

Acting Chief

Hazardous Waste Bureau

JEK: svh

cc: Butch Tongate, NMED EPD
Tim Hall, NMED HWB
Steve Holmes, NMED HWB
Ricardo Maestas, NMED HWB
Thomas Kesterson, NMED DOE/OB
Julia Marple, NMED DOE/OB
Ted Sturdevant, WSDE
Laurie King, EPA Region 6
Tom Peake, EPA ORIA
Connie Walker, Trinity Engineering
Don Hancock, SRIC
Joni Arends, CCNS
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NMED COMMENTS ON THE
HANFORD SITE/CENTRAL CHARACTERIZATION PROJECT (HANFORD/CCP)
FINAL AUDIT REPORT A-11-10

NMED's review indicated that the body of the Audit Report and the C6 checklists generally appear to address the applicable elements. NMED provides the following comment for the Permittees consideration:

1. Question 1 of the C6 Checklist indicates the citation of CCP-PO-001, S. B-0a. The correct citation should be CCP-PO-001, S. C-0a.
2. Question 56a of the C6 Checklist states "List of any AK Sufficiency Determination requested for the waste stream." There should be a statement in the comment column that states that Hanford currently has no AK Sufficiency Determination requests.
3. Questions 149b, 168, and 169 of the C6 Checklist cites CCP-PO-001, S. B4-3f. The correct citation should be CCP-PO-001, S. C4-3f.
4. Question 184 of the C6 Checklist cites CCP-TP-082, S. 4.1 and S. 4.2. There is no S. 4.2 in CCP-TP-082.
5. Question 236 of the C6 Checklist cites CCP-TP-053, S. 4.4.3 [B] and [C]. CCP-TP-053, S. 4.4.3 does not exist. The correct citations should be CCP-TP-053, S. 4.4.2 [B] and [C].
6. Question 237 of the C6 Checklist cites CCP-TP-053, S. 4.4.3 [H.2] and Attachments 2 and 3. CCP-TP- 53, S. 4.4.3 does not exist. The correct citation should be CCP-TP-053, S. 4.4.2 [H.2] and Attachments 2 and 3.
7. Question 241 of the C6 Checklist cites CCP-TP-053, S. 2.3 [B] and 4.4.2 [C]. S. 2.3 [B] does not exist as part of this citation.
8. Question 245 of the C6 Checklist cites CCP-TP-053, S. 4.4.3 [H-2]. This citation does not exist. The correct citation should be CCP-TP-053, S. 4.4.2 [H.2].
9. Question 248 of the C6 Checklist cites CCP- QP-002, S. 4.3.2 [A-2]. This citation does not exist. The correct citation should be CCP-QP-002, S. 4.3.2 [A.2].