Mr. John Kieling, Acting Chief
Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Bldg. 1
Santa Fe, New Mexico 87505-6303

Subject: Transmittal of the Final Audit Report for the SNL/CCP Certification Audit A-11-23

Dear Mr. Kieling:

This letter transmits the Final Audit Report for Carlsbad Field Office (CBFO) Audit A-11-23 of the Sandia National Laboratories Central Characterization Project (SNL/CCP) performing characterization and certification activities as required by Part 2, Section 2.3.2.3 of the Waste Isolation Pilot Plant Hazardous Waste Facility Permit. The audit was conducted July 13-15, 2011. The report contains the results of the certification audit performed for remote-handled Summary Category Group S5000 debris waste.

I certify under penalty of law that this document and all enclosures were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.

Should you have any questions concerning this report, please contact the CBFO Quality Assurance Director, Mr. Randy Unger, at (575) 234-7065.

Sincerely,

Edward Ziemianski
Interim Manager

Enclosure
U.S. DEPARTMENT OF ENERGY
CARLSBAD FIELD OFFICE

FINAL AUDIT REPORT

OF THE

SANDIA NATIONAL LABORATORIES (SNL)
CENTRAL CHARACTERIZATION PROJECT (CCP)

CARLSBAD, NEW MEXICO

AUDIT NUMBER A-11-23

JULY 13 - 15, 2011

WASTE CHARACTERIZATION IN ACCORDANCE WITH THE
HAZARDOUS WASTE FACILITY PERMIT

Prepared by:  
Paul C. Gomez, CTAC  
Audit Team Leader

Approved by:  
Randy Unget, CBFO  
Quality Assurance Director

Date: 9/27/2011

Date: 21 Sep 11
1.0 EXECUTIVE SUMMARY

Carlsbad Field Office (CBFO) initial Certification Audit A-11-23 was conducted to evaluate the adequacy, implementation, and effectiveness of Sandia National Laboratories (SNL) Central Characterization Project (CCP) transuranic (TRU) waste characterization activities performed for remote-handled (RH) Summary Category Group (SCG) S5000 debris waste. Activities were evaluated relative to the requirements of the Waste Isolation Pilot Plant (WIPP) Hazardous Waste Facility Permit (HWFP), the Waste Acceptance Criteria (WAC) for the Waste Isolation Pilot Plant, the RH TRU Waste Characterization Program Implementation Plan (WCPIP), and the CBFO Quality Assurance Program Document (QAPD).

Audit A-11-23 was performed in Carlsbad, NM, July 13 through 15, 2011. Overall, the audit team concluded that the SNL/CCP technical and quality assurance (QA) programs, as applicable to the audited activities, were adequate, satisfactorily implemented, and effective for compliance with applicable upper-tier requirements.

During the audit, the audit team identified nine concerns not related to the HWFP Waste Analysis Plan (WAP), as discussed in the Interim Audit Report issued August 8, 2011. No HWFP-related Conditions Adverse to Quality (CAQs) were identified.

2.0 SCOPE AND PURPOSE

2.1 Scope

The audit team evaluated the adequacy, implementation, and effectiveness of the programs and requirements controlling SNL/CCP TRU waste characterization activities for RH SCG S5000 debris waste stream SNL-HCF-S5400-RH. This audit, in conjunction with Surveillance S-11-15 (conducted March 30 – 31, 2011) and Surveillance S-11-20 (conducted May 16, 2011), supplemented the evaluation for all the specific TRU waste characterization processes reviewed. The following elements were evaluated.

Quality Assurance Activities
- Personnel Qualifications and Training
- Nonconformances
- Records

Technical Activities
- Acceptable Knowledge (AK), including waste certification
- Project-level Data Validation and Verification (V&V)
- Headspace Gas (HSG) Sampling
- Visual Examination (VE)
- WIPP Waste Information System/Waste Data System (WWIS/WDS)
2.2 Purpose
Audit A-11-23 was conducted to evaluate the degree to which SNL/CCP waste characterization and certification activities for RH SCG S5000 debris waste stream SNL-HCF-S5400-RH are compliant with the HWFP and the CBFO QAPD.

3.0 REFERENCES
The evaluation of SNL/CCP TRU waste activities and documents was based on current revisions of the following documents:

- Waste Isolation Pilot Plant Hazardous Waste Facility Permit Number NM4890139088-TSDF
- CBFO Quality Assurance Program Document (QAPD), DOE/CBFO-94-1012
- Transuranic Waste Acceptance Criteria for the Waste Isolation Pilot Plant Project (WAC), DOE/WIPP-02-3122
- RH TRU Waste Characterization Program Implementation Plan (WCPIP), DOE/WIPP-02-314
- CCP Transuranic Waste Quality Assurance Characterization Project Plan (QAPjP), CCP-PO-001
- CCP Transuranic Waste Certification Plan, CCP-PO-002
- CCP/SNL Interface Document, CCP-PO-510

Related technical and QA implementing procedures

4.0 AUDIT TEAM AND OBSERVERS

AUDITORS/TECHNICAL SPECIALISTS

<table>
<thead>
<tr>
<th>Name</th>
<th>Position</th>
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<tr>
<td>Dennis S. Miehls</td>
<td>Management Representative, CBFO QA</td>
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<tr>
<td>Lea Chism</td>
<td>Auditor, CBFO QA</td>
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<tr>
<td>Paul C. Gomez</td>
<td>Audit Team Leader, CBFO Technical Assistance Contractor (CTAC)</td>
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<tr>
<td>Laurie Smith</td>
<td>Auditor, Los Alamos National Laboratory Carlsbad Operations (LANL/CO)</td>
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<td>Cindi Castillo</td>
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<td>Norm Frank</td>
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<td>William (BJ) Verret</td>
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<td>Dick Blauvelt</td>
<td>Technical Specialist, CTAC</td>
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The individuals who were contacted during the SNL/CCP audit are identified in Attachment 1. A pre-audit meeting was held in the Skeen-Whitlock Building QA conference room in Carlsbad, NM, on July 13, 2011. Daily meetings were held with SNL/CCP management and staff to discuss audit progress, issues, and potential deficiencies. The audit concluded with a post-audit meeting held in the Skeen-Whitlock Building QA conference room in Carlsbad, NM, on July 15, 2011.

5.0 SUMMARY OF AUDIT RESULTS

This audit was performed to assess the ability of SNL/CCP to characterize RH SCG S5000 debris waste for compliance with the requirements specified in the WIPP HWFP WAP and the CBFO QAPD. Evaluations of program elements for personnel qualifications and training, nonconformance reporting, and records were performed. The characterization methods assessed were AK, VE, and HSG sample collection. Processes evaluated included data-generation and project-level data V&V, preparation of Waste Stream Profile Forms (WSPFs), data quality objective (DQO) reconciliation, and WWIS/WDS data entry.

The audit team concluded that the SNL/CCP TRU waste characterization program is adequate, satisfactorily implemented, and effective for compliance with the requirements of the HWFP. Attachment 2 contains the table, Personnel Contacted During the Audit by Area. Attachment 3 lists the objective evidence reviewed during the audit. Audit activities, including associated objective evidence reviewed, are described below and in the attached C6 checklists. The C6 checklists identify the SNL/CCP documents and procedures demonstrating compliance with the HWFP. Attachment 4 is a table of audited documents for the applicable C6-1 through C6-6 WAP requirements. Attachment 5 identifies the list of processes and equipment reviewed during the audit.

5.1 Quality Assurance Activities

The following C6-1 checklist items related to QA program implementation were evaluated by the audit team. Each QA element evaluated is discussed in detail below. The objective evidence used to assess compliance and the conclusions reached for each area are briefly cited.

5.1.1 Personnel Qualifications and Training

The audit team conducted interviews with responsible personnel and reviewed implementing Procedure CCP-QP-002, Rev. 31, CCP Training and Qualification Plan, to determine the degree to which the procedure adequately addresses upper-tier requirements. Personnel training records associated with VE, HSG
Sampling/Operations, AK, and Site Project Management were examined to verify implementation of associated requirements and to verify that personnel performing characterization activities are appropriately qualified. Records reviewed included qualification cards, appointment letters, and other pertinent qualification documentation, including attendance sheets for briefings on AK summaries for VE operators.

The procedures reviewed and objective evidence assembled and evaluated during the audit provided evidence that the applicable requirements for personnel training and qualification are adequately established for compliance with upper-tier requirements, satisfactory in the implementation of these requirements, and effective in achieving the desired results.

5.1.2 Nonconformances

The audit team interviewed the resident QA engineer and randomly selected a sampling of nonconformance reports (NCRs) (NCR-RHSLNL-2350-11, NCR-RHSLNL-2351-11, NCR-RHSLNL-2352-11, NCR-RHSLNL-2345-11, NCR-RHSLNL-2346-11, NCR-RHSLNL-2347-11, and NCR-RHSLNL-2348-11) to confirm that deficiencies are appropriately documented and tracked through resolution. There were no NCRs that required reporting to the Permittee within the seven-day requirement at the time of the audit. All NCRs were verified as being managed and tracked in the CCP data center and the CCP NCR Logs.

Overall, Nonconformance reporting activities were determined to be adequately established for compliance with upper-tier requirements, satisfactory in the implementation of these requirements, and effective in achieving the desired results.

5.1.3 Records

The audit team conducted interviews and reviewed implementing procedures relative to the control and administration of QA records to determine the degree to which the procedures adequately address upper-tier requirements. The audit team reviewed CCP-PO-001, Rev. 18, CCP Transuranic Waste Characterization Quality Assurance Project Plan; CCP-QP-008, Rev. 17, CCP Records Management; and CCP-QP-028, Rev. 12, CCP Records Filing, Inventorying, Scheduling, and Dispositioning. Control of QA records was verified through review of the CCP RH Records Inventory and Disposition Schedule (RIDS) dated 3/15/11.

The procedures reviewed and objective evidence assembled and evaluated during the audit provided evidence that the applicable requirements for QA Records are adequately established for compliance with upper-tier requirements, satisfactory in the implementation of these requirements, and effective in achieving the desired results.

5.2 Technical Activities

The audit team evaluated generation-level and project-level data V&V, AK including waste certification, HSG sampling and analysis, and VE activities. Objective evidence was selected and reviewed to evaluate implementation of requirements for
characterization activities. This included, but was not limited to, source documents, AK summaries, batch data reports (BDRs), and sampling records. Evaluations from Surveillances S-11-15 and S-11-20 included direct observation of actual waste characterization activities such as VE and HSG sampling. Each characterization process involves:

- Collecting raw data
- Collecting quality assurance/quality control (QA/QC) samples or information
- Reducing the data to a useable format, including a standard report
- Review of the report by the data generation facility and the site project office
- Comparing the data against program DQOs
- Reporting the final waste characterization information to WIPP

The flow of data for each characterization technique was reviewed to ensure that all applicable requirements were captured in the site operating procedures. Specific procedures audited and the objective evidence reviewed are described in the following sections. Objective evidence assembled and used to assess compliance and the conclusions reached for each area are briefly cited.

5.2.1 Acceptable Knowledge

The audit team reviewed the AK process and examined AK documentation for RH S5000 TRU debris waste stream SNL-HCF-S5400-RH, generated in the SNL Hot Cell Facility (HCF). The audit team evaluated AK Summary Report CCP-AK-SNL-500 Rev. 2, CCP AK Summary Report for Sandia National Laboratories RH Hot Cell Facility TRU Waste (Debris). The audit team completed relevant sections of the WAP C6-3 and C6-1 checklists, compiling and reviewing objective evidence to demonstrate compliance.

The objective evidence reviewed and compiled included the AK Summary Report referenced above, numerous AK source documents, a draft WAP-compliant WSPF and attachments, and BDRs for HSG and VE characterization activities. The random container selection memo for HSG sampling and analysis was also examined, along with the corresponding HSG Analysis Summary Report.

With regard to the WAP requirements, in addition to the AK Summary Report, AK Source Document Summaries and other relevant AK records cited above, the audit team reviewed CCP-TP-005, Acceptable Knowledge Documentation Checklist, Attachment 1; CCP-TP-005, Acceptable Knowledge Source Document Reference List, Attachment 4; CCP-TP-005, Hazardous Constituents Form, Attachment 5; CCP-TP-005, Waste Form, Waste Material Parameters, Prohibited Items and Packaging Form, Attachment 6, along with the applicable justification memo for waste material parameter weight estimates; and CCP-TP-005, Waste Containers List, Attachment 8.

Examples of the resolution of AK discrepancies in the AK record, a WAP-compliant AK Accuracy Report, and the most recent internal surveillance were collected and examined along with screenshots from the Item Description Code (IDC) database and a copy of the AK Tracking Spreadsheet. Requisite training records were reviewed for AK
experts (AKEs) and site project managers (SPMs). The audit team evaluated WAP-required container traceability for four waste containers from the total available population of 10, all of which were part of lot 1 of the HSG sampling batch. Original container input forms were compiled as available.

The WAP Compliance Tracking Spreadsheet documenting compliance with the new WAP requirements for AK had been completed prior to the audit, referencing appropriate sections of the AK Summary Report. The spreadsheet was judged to be satisfactory and will be appended to the AK Summary Report in the final audit report objective evidence.

The audit team reviewed the availability of AK documentation in the controlled records files. All documents evaluated were present. The procedure reviews, field observations, and document reviews provided evidence that the applicable requirements for Acceptable Knowledge are adequately established for compliance with upper-tier requirements, satisfactory in the implementation of these requirements, and effective in achieving the desired results.

5.2.2 Project-level Data Validation and Verification

The audit team conducted interviews with responsible personnel and reviewed implementing procedures CCP-TP-001, Rev. 19, CCP Project Level Data Validation and Verification; CCP-TP-003, CCP Data Analysis for S3000, S4000, and S5000 Characterization; CCP-TP-500, CCP Remote-Handled Waste Visual Examination; and CCP-TP-162, Rev. 1, CCP Random Selection of Containers for Solids and Headspace Gas Sampling and Analysis, relative to project-level V&V activities, to determine the degree to which procedures adequately address upper-tier requirements.

Objective evidence was reviewed to ensure project-level activities were adequately performed to support waste characterization. BDRs were evaluated based on project-level requirements for VE and HSG sampling and analysis for the SCG S5000 waste. Random selection requirements for HSG were evaluated. The quarterly repeat data-generation-level reviews for VE and HSG sampling and analysis were also evaluated.

A review of the draft WSPF/Characterization Information Summary for SNL/CCP was performed.

The project-level data V&V process was evaluated by reviewing the following BDRs:

VE

RHSNLVE100001
RHSNLVE110001
RHSNLVE110002
HSG

SNHSG1101
ECL11019G
ECL11019M

No concerns were identified during the audit for V&V. The procedure reviews, field observations, and document reviews provided evidence that the applicable requirements for the Project-level Data Validation and Verification process are adequately established for compliance with upper-tier requirements, satisfactory in the implementation of these requirements, and effective in achieving the desired results.

5.2.3 Headspace Gas Sampling

The audit team reviewed implementing procedures CCP-TP-093, Rev. 15, *CCP Sampling of TRU Waste Containers*; CCP-TP-106, Rev. 7, *CCP Headspace Gas Sampling Batch Data Report Preparation*; and CCP-TP-003, *CCP Data Analysis for S3000, S4000, and S5000 Characterization*, relative to HSG sampling activities, to determine the degree to which procedures adequately address upper-tier requirements. The audit team assessed the ability of SNL/CCP to characterize RH waste from SCG S5000 debris using HSG sampling. SNL/CCP operations for HSG sampling is performed using SUMMA® canisters. The HSG samples are analyzed by the Idaho National Laboratory (INL) Environmental Chemistry Laboratory (ECL). The INL/ECL is certified by CBFO separately, where participation in the Performance Demonstration Program (PDP) is verified.

Documentation and activities examined were recorded in BDR SNHSG1101. The BDR contained copies of the chain-of-custody (COC) form, sample tags, needle blank results, container data, temperature equilibration information and an Independent Technical Reviewer (ITR) form, which were reviewed during this audit. The audit team reviewed training records for personnel performing sampling activities and initiating and maintaining custody; these were verified to be current and acceptable.

The audit team determined that overall, the field observations conducted and the SNL/CCP procedures and other documents reviewed provided evidence that the applicable requirements for HSG sampling are adequately established for compliance with upper-tier requirements, satisfactory in the implementation of these requirements, and effective in achieving the desired results.

5.2.4 Visual Examination

The audit team evaluated the adequacy, implementation and effectiveness of the ability of SNL/CCP to characterize and certify RH S5000 debris waste using the VE characterization process.

The audit team evaluated VE procedures CCP-TP-500 Rev. 10, *CCP Remote-Handled Waste Visual Examination* (the revision used during the VE process), CCP-TP-163,

The audit team examined the following RH VE BDRs:

RHSNLVE100001
RHSNLVE110001
RHSNLVE110002
RHSNLVE110003
RHSNLVE110004
RHSNLVE110006

These BDRs were for containers in waste stream SNL-HCF-S5400-RH. SNL/CCP uses the two-operator method when performing VE characterization activities. Two qualified operators visually examine the waste as it is removed from the parent container and placed into 30-gallon drums, which in turn are packaged into 55-gallon drums. The actual observations of the VE operations performed were completed during Surveillance S-11-20.

During the audit, training files for six VE operators and appointment letters for five VEEs were reviewed. All VE personnel were determined to be qualified to perform VE processes at SNL.

Overall, the RH VE activities evaluated were determined to be adequate in addressing upper-tier requirements as applicable, satisfactory in the implementation of these requirements, effective in achieving the desired results.

5.2.5 WIPP Waste Information System/Waste Data System

The audit team conducted interviews and reviewed procedure CCP-TP-530, Rev. 9, CCP RH TRU Waste Certification and WWIS/WDS Data Entry, relative to the WWIS/WDS data entry process to determine the degree to which the procedure adequately addresses upper-tier requirements.

The audit team evaluated implementation of the CCP TRU Waste Certification and WWIS/WDS data entry procedure for data entry using the WWIS/WDS Data Entry Spreadsheet. The evaluation included data population of the spreadsheet, a review of data entry by a Waste Certification Assistant, and waste certification by the Waste Certification Official.

Draft entry documentation for this process was provided due to the low volume of data available and initial certification for this site. The characterization data used are valid data for only one container, SNLNM007010. The other simulated data used for two containers, SNLNM007011 and SNLNM007012, and for canister SNL0001 are "mock" data. The WDS Data Entry Spreadsheet and the WDS Waste Container Data Report are draft, per procedure; CCP is not allowed to enter data from a noncertified site onto the WDS Data Entry Spreadsheet. The WDS Data Entry Spreadsheet was uploaded
into the TEST instance (TST01) of WDS in order to test the accuracy of the data
transfer from the WDS Data Entry Spreadsheet into WDS. Record reviews included
pages from BDRS showing analysis values, draft WWIS/WDS Container Data Reports,
and submittals for WWIS review/approval.

The audit team reviewed one WWIS/WDS waste certification package for canister
SNL0001, which had three internal containers for RH waste (SNLNM007010,
SNLNM007011, and SNLNM007012).

The procedure reviews, field observations, and document reviews provided evidence
that the applicable requirements for WWIS/WDS Data Entry are adequately established
for compliance with upper-tier requirements, satisfactory in the implementation of these
requirements, and effective in achieving the desired results.

6.0 CORRECTIVE ACTION REPORTS, FINDINGS CORRECTED DURING THE
AUDIT, OBSERVATIONS, AND RECOMMENDATIONS

6.1 Corrective Action Reports

During the audit, the audit team may identify conditions adverse to quality (CAQs) and
document such conditions on a corrective action report. CAQs are defined below.

Condition Adverse to Quality – Term used in reference to failures, malfunctions,
deficiencies, defective items, and nonconformances.

Significant Condition Adverse to Quality – A condition which, if uncorrected, could have
a serious effect on safety, operability, waste confinement, TRU waste site certification,
compliance demonstration, or the effective implementation of the Quality Assurance
(QA) program.

No WAP-related CARs were issued as a result of CBFO Audit A-11-23.

6.2 Findings Corrected During the Audit

During the audit, the audit team may identify CAQs. The audit team members and the
ATL evaluate the CAQs to determine if they are significant.

Once a determination is made that the CAQ is not significant, the audit team member, in
conjunction with the ATL, determines if the CAQ is an isolated case requiring only
remedial action and CDA. Upon determination that the CAQ is isolated, the audit team
member, in conjunction with the ATL, evaluates/verifies any objective evidence/actions
submitted or taken by the audited organization and determines if the condition was
corrected in an acceptable manner. Once it has been determined that the CAQ has
been corrected, the ATL categorizes the condition as a CDA according to the definition
below.

Corrected During the Audit – Isolated deficiencies that do not require a root cause
determination or actions to preclude recurrence. Correction of the deficiency can be
verified prior to the end of the audit. Examples include one or two minor changes required to correct a procedure (isolated), one or two forms not signed or not dated (isolated), and one or two individuals that have not completed a reading assignment.

No WAP-related CDAs were identified and corrected during Audit A-11-23.

6.3 Observations

During the audit, the audit team may identify potential problems or make suggestions for improvement that should be communicated to the audited organization. The audit team member, in conjunction with the ATL, evaluates these conditions and classifies them as Observations or Recommendations using the following definitions.

Observation – A condition that, if not controlled, could result in a CAQ.

Recommendation – Suggestion that is directed toward identifying opportunities for improvement and enhancing methods of implementing requirements.

Once a determination is made, the audit team member, in conjunction with the ATL, categorizes the condition appropriately.

No WAP-related Observations were provided to SNL/CCP management as a result of the audit.

6.4 Recommendations

No WAP-related Recommendations were presented to SNL/CCP management as a result of this audit.

7.0 ATTACHMENTS

Attachment 1: Personnel Contacted During the Audit
Attachment 2: Personnel Contacted During the Audit by Area
Attachment 3: Objective Evidence
Attachment 4: Table of Audited Documents
Attachment 5: List of Processes and Equipment Reviewed.
## PERSONNEL CONTACTED DURING THE AUDIT

**PERSONNEL CONTACTED DURING AUDIT A-11-23**

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<th>NAME</th>
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Objective Evidence Reviewed During the Audit

The objective evidence supporting Audit A-11-23 is included in the box submitted with this report. Included in the box is a "Content Map" describing the location (using color coding) and identity of all required objective evidence supporting the performance of the audit.
### TABLE OF AUDITED DOCUMENTS

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<td>CCP Training and Qualification Plan</td>
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<td>CCP TRU Nonconforming Item Reporting and Control</td>
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<td>CCP-QP-008</td>
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<td>CCP Records Management</td>
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<td>CCP Surveillance Program</td>
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<td>CCP-QP-028</td>
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<td>CCP Records Filing, Inventoring, Scheduling, and Dispositioning</td>
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<td>8.</td>
<td>CCP-TP-001</td>
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<td>CCP Project Level Data Validation and Verification</td>
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<td>CCP Reconciliation of DQOs and Reporting Characterization Data</td>
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<td>CCP Data Analysis for S3000, S4000, and S5000 Characterization</td>
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<td>CCP Acceptable Knowledge Documentation</td>
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<td>CCP-TP-082</td>
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<td>CCP Waste Container Filter Vent Operation</td>
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<td>CCP-TP-093</td>
<td>15</td>
<td>CCP Sampling of TRU Waste Containers</td>
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<td>CCP-TP-106</td>
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<td>CCP Headspace Gas Sampling Batch Data Report Preparation</td>
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<td>CCP-TP-162</td>
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<td>CCP Random Selection of Containers for Solids and Headspace Gas Sampling and Analysis</td>
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<td>CCP-TP-163</td>
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<td>CCP Evaluation of Waste Packaging Records for Visual Examination of Records</td>
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<td>CCP-TP-500</td>
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<td>CCP Remote-Handled Waste Visual Examination</td>
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<td>CCP-TP-530</td>
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<td>CCP RH TRU Waste Certification and WWIS/WDS Data Entry</td>
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