



Department of Energy
Carlsbad Field Office
P. O. Box 3090
Carlsbad, New Mexico 88221

JAN 2ND 2012

RECEIVED



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

Subject: Revised Documents and CBFO Responses to NMED Comments on Final Report of Audit A-11-20 of the ANL/CCP

Dear Mr. Kieling:

This letter transmits the revised Final Audit Report for Audit A-11-20, Argonne National Laboratory Central Characterization Project (ANL/CCP), the revised C6-1, C6-3, and C6-4 checklists, a revised GEN11 objective evidence package, and Carlsbad Field Office (CBFO) responses to New Mexico Environment Department (NMED) comments received by letter dated December 9, 2011.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision according to 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 fine and imprisonment for knowing violations.

If you have any questions concerning these revised documents, please contact Mr. Randy Unger, Director of Quality Assurance, at (575) 234-7065.

Sincerely,


Edward Ziemianski
Interim Manager

Enclosures



Mr. John Kieling

-2-

January 20, 2012

cc: w/enclosure (Report Narrative)

G. Basabilvazo, CBFO *ED

R. Unger, CBFO ED

J.R. Stroble, CBFO ED

S. McCauslin, CBFO ED

T. Morgan, CBFO ED

C. Fesmire, CBFO ED

T. Kliphuis, NMED ED

T. Hall, NMED ED

S. Holmes, NMED ED

R. Maestas, NMED ED

R. Allen, CTAC ED

M. Mager, CTAC ED

G. Knox, CTAC ED

W. Most, RES ED

L. Pastorello, RES ED

*ED denotes electronic distribution

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WIPP Operating Record, MS: 452-09

CBFO QA File

CBFO M&RC

**NMED COMMENTS ON THE
ARGONNE NATIONAL LABORATORY CENTRAL CHARACTERIZATION
PROJECT (LANL/CCP) FINAL AUDIT REPORT A-11-20**

NMED's review indicated that the body of the audit report and the C6 checklists generally appear to address the applicable elements. NMED provided the following comment for the Permittees consideration.

1. The summary paragraph of the Content Map states that audit A-11-20 was conducted August 2-3, 2011. The correct date should be August 2-4, 2011.

Response: The A-11-20 Content Map was revised to correct the date to August 2 – 4, 2011.

2. The GEN 11: description in the Content Map does not mention the RIDS dated 2/01/2011. This document is included in the box as objective evidence under GEN 11.

Response: GEN-11 was edited to remove RIDS 02/01/2011. RIDS 02/01/2011 was not used as OE for any C6 questions during A-11-20.

3. The AK 11 description in the Content Map does not mention Lot 1 as being included with the HSG Random Container Selection Memo.

Response: The A-11-20 Content Map was revised to correct the AK-11 description. Lot 1 was added.

4. The AK 12 description in the Content Map does not mention Lot 1 as being included with the HSG Summary Report.

Response: The A-11-20 Content Map was revised to correct the AK-12 description. Lot 1 was added.

5. Pertaining to AK 23 through AK 28 of the Content Map, the AK numbers and the descriptions of the objective evidence are mismatched.

Response: The A-11-20 Content Map was revised to reflect the correct numbering of OE AK 23 through AK28.

6. The AK 24 description in the Content Map does not mention Lot 1 as being included with the AK Waste Stream Characterization Checklist.

Response: The A-11-20 Content Map was revised to reflect the correct AK-24 description. Lot 1 was added.

7. Under Visual Examination, Section 5.3.3 of the final audit report it states "The audit team examined training records for seven VE operators/Independent Technical Reviewers, and two SPMs and confirmed the appointment of two ANL/CCP VEEs." Objective evidence

is provided for all personnel mentioned with the exception that only five VE Operator/ITR personnel have training records and not seven as the report indicates.

Response: A-11-20 Section 5.3.3 of the final report was revised to state "...records for five VE operators..."

8. Under Control of Nonconforming Items, Section 5.4.1 of the report it states that "all seven" NCRs were selected for review. There are eight NCRs listed in the report and provided as objective evidence.

Response: A-11-20 Section 5.4.1 of the final report revised to state "... selected all eight ANL nonconformance reports (NCRs)..."

9. Under Quality Assurance Records, Section 5.4.3 of the report it states "Control of QA records was verified through the review of the CCP RH (All Sites) Records Inventory and Disposition Schedule (RIDS) dated 2/21/11. No concerns were identified. "There is no mention of the RIDS dated 2/01/2011 that is provided as objective evidence under GEN 11.

Response: See resolution of comment 3. RIDS 02/01/2011 was removed for GEN 11.

10. Question 24 of the C6 Checklist needs to have a statement in the Comment column clarifying that the question related to the analytical laboratory at INL and that this is not in the scope of this audit and that INL/CCP performs the analysis.

Response: Question 24 was revised to add a comment indicating that coring is not in the scope of A-11-20.

11. Question 35 of the C6 Checklist needs to have a comment in the Comment column clarifying that the analytical report is generated at the INL/CCP Analytical laboratory.

Response: Question 35 was revised to add a comment indicating that analysis is performed at INL/CCP Labs.

12. Questions 56 and 61 of the C6 Checklist the answers to the questions are incomplete. Another citation, Attachment 2, should have been included in the Location column.

Response: Attachment 2 is referenced within CCP-TP-002 section 4.3. This citation is consistent with previous audits.

13. Questions 72 and 73 of the C6 Checklist indicate that the referenced Section of the Permit (Section C-5b) must be answered for completeness of the C6 Checklist. Shipments must be part of the scope of the audit in prior audit reports (LANL/CCP Recertification Audit A-11-11, for example) where the CCP-TP-033 (ALL) was the procedure for the Location column and Uniform Hazardous Waste Manifests & shipping package documentation for the following shipment numbers: LA110052 dated 5/13/11. LA110053 dated 5/16/11, and LA110054 dated 5/17/11 were referenced as Item 033 was submitted as the procedures for the Location column and Uniform Hazardous Waste

Manifests & shipping documentation for the following shipment numbers: LA110052 dated 5/13/11, LA110053 dated 5/16/11, and LA11054 dated 5/17/11.

Response: Questions 72 and 73 comments were revised to add "...as shipping activities were not available for review. CCP Site wide transportation activities were reviewed during CBFO Audit A-11-24."

14. Question 144, Part D, of the C6 Checklist needs a comment in the Comment column to state that ANL/CCP only performs sampling. The analysis is performed at INL/CCP analytical laboratory.

Response: Question 144 comment was revised to add "ANL/CCP only performs sampling. Analysis of the samples is performed at INL/CCP Labs."

15. Question 144, Part F of the C6 Checklist needs to be answered.

Response: Question 144, part F is answered under the applicable process section (VE).

16. Questions 155 and 158 of the C6 Checklist need to identify the waste stream in the Comments column for clarification.

Response: Reference was added.

17. Question 210 of the C6 Checklist indicates the citation of CCP-TP-093 Canister Tags. This citation does not exist. The correct citation should be CCP-TP-093, Sections 4.5 3[J], 4.5.4 [Q], 4.5.5 [Q], 4.5.6 [N], and Attachment 1.

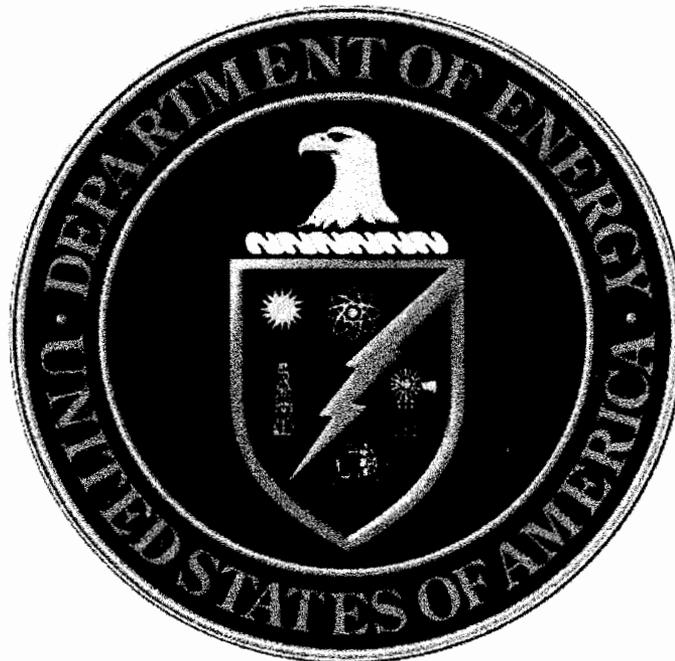
Response: Question 210 citation was revised to read CCP-TP-093, Attachment 1. The question asks if items are identified and traceable, and Attachment 1, Chain of Custody/Canister Tag, provides the objective evidence of identification and traceability.

Appendix A
Redlined A-11-20 Content Map

**U.S. Department of Energy
Carlsbad Field Office**

CONTENT MAP

**Final Audit Report
of Argonne National Laboratory/
Central Characterization Project**



**Audit Number A-11-20
August 2-4, 2011**

CONTENT MAP

This box contains the Final Audit Report of CBFO Audit A-11-20 of The Argonne National Laboratory Central Characterization Project (ANL/CCP) conducted August 2 - 31, 2011. The box also contains a list of objective evidence used to conduct the audit. The documents have been organized into color-coded folders, one each for the ANL/CCP Procedures (Purple Folder), Final Audit Report (manila folder), the C-6 Checklist (brown folder), Waste Analysis Plan (WAP) (green folder), Acceptable Knowledge (dark blue folder), Headspace Gas (brown folder), and Visual Examination (yellow folder). The list below identifies each document by name and number and indicates where each may be found.

CONTENT MAP	Black Folder
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Final Audit Report	Manila Folder
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Final Audit Report Attachment 1: Personnel Contacted During the Audit Attachment 2: Personnel Contacted During the Audit by Area Attachment 3: Objective Evidence Attachment 4: Listing of ANL/CCP Audited Documents Attachment 5: Processes and Equipment Evaluated During CBFO Audit A-11-20 Attachment 6: Procedure Revision Matrix
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C6 Checklist	Brown Folder
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C6-1	Table C6-1 Waste Analysis Plan (WAP) Checklist
C6-3	Table C6-3 Acceptable Knowledge (AK) Checklist
C6-4	Table C6-4 Headspace Gas Checklist
C6-6	Table C6-6 Visual Examination (VE) Checklist

ANL/CCP Implementing Procedures Audited	Purple Folder
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See Final Report Attachment 4 for List of Audited ANL/CCP Procedures
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GEN1	Batch Data Reports - RHANLVE110002, RHANLVE110007, and ANLRHVE11008
GEN2	Batch Data Reports - ANHSGS100003, ECL10033G, and ECL10033M
GEN3	CP:08:00374 – Transmittal of Waste Stream Profile Form, Attachment 2, for Remote Handled Waste Stream AERHDM at the Argonne National Laboratory with Characterization Information Summary CP:08:00375 - Transmittal of Waste Stream Profile Form, Attachment 4, for Remote Handled Waste Stream AERHDM at the Argonne National Laboratory
GEN4	Headspace Gas Random Sample Selections
GEN5	VE and HSG Quarterly Repeats

GEN6	CP:08:00377 – Report of Field Reference Standard Results for the Central Characterization Project – Argonne National Laboratory
GEN7	CP:09:01124 – Delegation of Authority to Release Central Characterization Project Headspace Gas Samples
GEN8	Records packages for the following NCRs: NCR-RHANL-0501-10, NCR-RHANL-0502-10, NCR-RHANL-0503-10, NCR-RHANL-0504-10, NCR-RHANL-2343-11, NCR-RHANL-0400-11, NCR-RHANL-2254-11, and NCR-RHANL-2255-11
GEN9	2011 RHANL NCR Logs
GEN10	Draft characterization data packages for the following containers were reviewed which included CCP data spreadsheet reports, pages from batch data reports showing analyses values, and WWIS/WDS Container Data Reports. RH Package for Canister AE0089, including three containers: Drum #1005, Drum #1028, and Drum #955
GEN11	CCP RH (All Sites) Records Inventory and Disposition Schedule (RIDS) dated 2/21/2011
GEN12	RH Program – ANLE List of Qualified Individuals (LOQI) dated 8/2/2011
GEN13	Qualification records for selected CCP personnel.
GEN14	Training/Qualification records for Acceptable Knowledge Experts (AKEs) performing characterization related activities
Acceptable Knowledge (AK) (Checklist C6-3) Blue Folder	
AK1	CCP AK Summary Report for ANL RH Debris Waste, waste stream AERHDM, CCP-AK-ANLE-500 R6, S2.0
AK2	Waste Stream Profile Form and attachments for waste stream AERHDM
AK3	QMIS Approval for AK Summary for waste stream AERHDM
AK4	AK Source Document Summaries for waste stream AERHDM
AK5	AK Documentation Checklist, Attachment 1, for waste stream AERHDM
AK6	Acceptable Knowledge Information List for waste stream AERHDM
AK7	AK Att. 5, Hazardous Constituents, for waste stream AERHDM
AK8	AK Att. 6, Waste Form, Waste Material Parameters, Prohibited Items and Packaging for waste stream AERHDM
AK9	AK attachment 8 container list
AK10	AK Discrepancy Resolutions
AK11	HSG Random Container Selection Memo, Lot <u>1,2,3,4</u>
AK12	HSG Summary Report Lot <u>1,2,3,4</u>
AK13	Batch Data Report - ANLRHVE11009
AK14	Batch Data Report - RHANLVE100013
AK15	Batch Data Report - RHANLVE100005
AK16	Batch Data Report - RHANLVE090002
AK17	Batch Data Report - RHANLVE060002
AK18	Batch Data Report - ANHSGS100001
AK19	Batch Data Report - ECL10012M
AK20	Batch Data Report - ANHSGS100003
AK21	Batch Data Report - ECL10033M
AK22	Batch Data Report - ANHSGS090001
AK23	Batch Data Report - ECL09014M
AK234	AK Waste Stream Characterization Checklist , Lot <u>1,9,15,22</u>
AK245	AK Accuracy Report
AK256	Internal Surveillance

AK267 AK278 AK28	IDC Database with "reject field" AK Tracking Spreadsheet
HSG1	Batch Data Report - ANHSGS100003
Visual Examination (Checklist C6-6)	
	Yellow Folder
VE1	Batch Data Report - RHANLVE100009, RHANLVE100013, RHANLVE100016, RHANLVE110003, RHANLVE110007, and ANLRHVE11009
VE2	VE Training Records
VE3	VE Training Records & VEE Appointment Letters

Appendix B
Revised A-11-20 GEN11 Objective Evidence

Revised

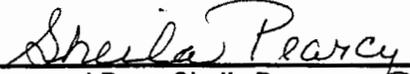
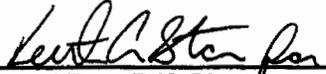
GEN 11

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Waste Isolation Pilot Plant RECORDS INVENTORY AND DISPOSITION SCHEDULE (RIDS)	1. <input type="checkbox"/> DOE <input checked="" type="checkbox"/> Contractor	2. Page 1 of 39
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3a. Organization Unit (Creating or Custodial Unit) Washington TRU Solutions (WTS)/Retrieval, Characterization, and Transportation (RCT)/Central Characterization Project (CCP)/Remote Handled (RH) for All Sites 4021 National Parks Highway Carlsbad, New Mexico 88220	3b. Bldg. & Rm. No. Skeen Whitlock Building (SWB)	4. Date 2/21/2011
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5. Signatures (of Appropriate Personnel)

 Prepared By Sheila Percy CCP Lead Records Custodian	3/14/11 Date	N/A Records Liaison Officer	Date
 Approved By D.K. Ploetz CCP Manager	3/14/11 Date	 Records Officer Approval Thomas L. Myers	2/15/2011 Date

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6. Item No.	7. Filing Series, Description, and Location of File (If Different from 3c.), and Inclusive Dates	8. Disposition Authority	9. Authorized Disposition Instructions	10. Transfer Instructions
1	CCP RH TRAINING DOCUMENTATION FILES Documentation pertaining to the training and qualification of CCP RH Personnel.			

Waste Isolation Pilot Plant RECORDS INVENTORY AND DISPOSITION SCHEDULE (RIDS)	1. <input type="checkbox"/> DOE <input checked="" type="checkbox"/> Contractor	2. Page 2 of 39
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6. Item No.	7. Filing Series, Description, and Location of File (If Different from 3c.), and Inclusive Dates	8. Disposition Authority	9. Authorized Disposition Instructions	10. Transfer Instructions
1(a)	<p><u>CCP RH Employee Individual Training/Qualification Documentation</u> Contractor employee individual training folder documenting the training and qualification of CCP RH Personnel. May include but not limited to the following: appointment letters; qualification letters; correspondence; On-the-Job (OJT) records; completed exams; completed qualification cards; certificates of completion; test drum data sheets; training drum evaluation data sheets; resumes; and Waste Acceptance Plan (WAP) briefings. May include Attachment 2, CCP Records Transmittal/Receiving Form(s).</p> <p>PRIVACY</p> <p>Quality Assurance (QA) Records/Nonpermanent/Validated by authorized signature and date.</p> <p>Media Type: Hard Copy Filing Order: Alphabetically Inclusive Dates: 2005 to Present Location: CCP Records – SWB And/or Waste Isolation Pilot Plant (WIPP) Records Archive (WRA)</p>	ADM 1.29.1.b	Cut off at the time of separation or transfer of the employee. Screen out and destroy all item 1.29.1.a.(4) records. Transfer folders with remaining documents to the local Federal Records Center. Destroy 75 years after cutoff.	Retain in CCP Records until completion of characterization process for each site or when no longer needed in project files to support daily functions or audits. Transfer to the WRA within one year for storage and retention.

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Waste Isolation Pilot Plant RECORDS INVENTORY AND DISPOSITION SCHEDULE (RIDS)	1. <input type="checkbox"/> DOE <input checked="" type="checkbox"/> Contractor	2. Page 3 of 39
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6. Item No.	7. Filing Series, Description, and Location of File (If Different from 3c.), and Inclusive Dates	8. Disposition Authority	9. Authorized Disposition Instructions	10. Transfer Instructions
1(b)	<p><u>CCP RH Employee Individual Re-qualification Documentation - Recertifications</u> Contractor employee individual training folder documenting the re-qualification of CCP RH personnel. May contain completed exams, completed qualification cards, completed performance tests, and certificates of completion. May include Attachment 2, CCP Records Transmittal/Receiving Form(s).</p> <p>PRIVACY</p> <p>QA Records/Nonpermanent/Validated by authorized signature and date.</p> <p>Media Type: Hard Copy Filing Order: Alphabetically Inclusive Dates: 2005 to Present Location: CCP Records – SWB and/or WRA</p>	ADM 1.29.1.b	Cut off at the time of separation or transfer of the employee. Screen out and destroy all item 1.29.1.a (4) records. Transfer folders with remaining documents to the local Federal Records Center. Destroy 75 years after cutoff.	Retain in CCP Records until completion of characterization process for each site or when no longer needed in project files to support daily functions or audits. Transfer to the WRA within one year for storage and retention.

Waste Isolation Pilot Plant RECORDS INVENTORY AND DISPOSITION SCHEDULE (RIDS)	1. <input type="checkbox"/> DOE <input checked="" type="checkbox"/> Contractor	2. Page 4 of 39
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6. Item No.	7. Filing Series, Description, and Location of File (If Different from 3c.), and Inclusive Dates	8. Disposition Authority	9. Authorized Disposition Instructions	10. Transfer Instructions
1(c)	<p><u>Employee Individual Medical Examination</u> Contractor employee individual training folders containing ONLY the following, results of medical examinations (only pass/fail and restrictions); balance of results are to be retained in the medical file. Documentation pertaining to the eye examinations performed on the Nondestructive Examination (NDE), Helium Leak Detector (HLD), and Pressure Change Leak Testing (PCLT) personnel on an annual basis. May include Attachment 2, CCP Records Transmittal/Receiving Form(s).</p> <p>EPIDEMIOLOGICAL</p> <p>PRIVACY</p> <p>QA Record/Nonpermanent/Validated by authorized signature and date.</p> <p>Media Type: Hard Copy Filing Order: Alphabetically Inclusive Dates: 2000 to Present Location: CCP Records - SWB and/or WRA</p>	ADM 1.29.1.a.4	Cut off at the time of separation or transfer of the employee. Screen out and destroy all item 1.29.1.a (4) records. Transfer folders with remaining documents to the local Federal Records Center. Destroy 4 years after cutoff.	Retain in CCP Records until completion of characterization process for each site or when no longer needed in project files to support daily functions or audits. Transfer to the WRA within one year for storage and retention.

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Waste Isolation Pilot Plant RECORDS INVENTORY AND DISPOSITION SCHEDULE (RIDS)	1. <input type="checkbox"/> DOE <input checked="" type="checkbox"/> Contractor	2. Page 5 of 39
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6. Item No.	7. Filing Series, Description, and Location of File (If Different from 3c.), and Inclusive Dates	8. Disposition Authority	9. Authorized Disposition Instructions	10. Transfer Instructions
1(d)	<p><u>CCP Test Drum Audio/Video Media of Test Drum Qualification</u> Contractor employee individual training folders containing CCP audio/video media of qualification test performed by NDE personnel. This audio/video media of qualification test is performed by NDE personnel and is the second piece of the qualification. It supports the documentation captured on the supporting hard copy record(s). May include Attachment 2, CCP Records Transmittal/Receiving Form(s).</p> <p>PRIVACY</p> <p>QA Record/Nonpermanent/Validated by authorized signature and date.</p> <p>Media Type: Audio/Video Tape or DVD (Primary and Backup)</p> <p>Filing Order: Alpha-Numeric</p> <p>Inclusive Dates: 2000 to Present</p> <p>Location: CCP Records - SWB and/or WRA</p>	ADM 1.29.1.b	<p>Cut off at the time of separation or transfer of the employee. Screen out and destroy all item 1.29.1.a (4) records. Transfer folders with remaining documents to the local Federal Records Center. Destroy 75 years after cutoff.</p>	<p>Retain in CCP Records until completion of characterization process for each site or when no longer needed in project files to support daily functions or audits. Transfer to the WRA within one year for storage and retention.</p>

Waste Isolation Pilot Plant RECORDS INVENTORY AND DISPOSITION SCHEDULE (RIDS)	1. <input type="checkbox"/> DOE <input checked="" type="checkbox"/> Contractor	2. Page 6 of 39
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6. Item No.	7. Filing Series, Description, and Location of File (If Different from 3c.), and Inclusive Dates	8. Disposition Authority	9. Authorized Disposition Instructions	10. Transfer Instructions
1(e)	<p><u>CCP NDE Test Drum Inventories</u> Documentation pertaining to the assembly of NDE test and training drums which are used to qualify radiography operators per CCP-PO-001, CCP Transuranic (TRU) Waste Characterization QA Project Plan (QAPjP) and CCP-QP-002, CCP Qualification and Training Plan. The drum assembly is representative of the Waste Matrix Codes (WMCS) for Waste Stream Profile Forms. CCP NDE Test Drum Inventory Sheet has the Test Drum Identification Number, Date, Summary Category Group, if it has a plastic liner and the contents of the drum. May include Attachment 2, CCP Records Transmittal/Receiving Form(s).</p> <p>QA Record/Nonpermanent/Validated by authorized signature and date.</p> <p>Media Type: Hard Copy Filing Order: Chronologically Inclusive Dates: 2000 to Present Location: CCP Records - SWB and/or WRA</p>	Disposition Authority Pending National Archives and Records Administration (NARA) Approval	UNSCHEDULED - Do Not Destroy -	Retain in CCP Records until completion of characterization process for each site or when no longer needed in project files to support daily functions or audits. Transfer to the WRA within one year for storage and retention.
2	<p><u>CCP RH CORRECTIVE ACTION MANAGEMENT DOCUMENTATION</u> Documentation pertaining to the identification, classification, control, and correction of conditions adverse to quality and nonconforming items, activities, and processes associated with the CCP RH - All Sites.</p>			

Waste Isolation Pilot Plant RECORDS INVENTORY AND DISPOSITION SCHEDULE (RIDS)	1. <input type="checkbox"/> DOE <input checked="" type="checkbox"/> Contractor	2. Page 7 of 39
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6. Item No.	7. Filing Series, Description, and Location of File (If Different from 3c.), and Inclusive Dates	8. Disposition Authority	9. Authorized Disposition Instructions	10. Transfer Instructions
2(a)	<p><u>CCP RH Nonconformance Reports (NCRs)</u> Audit and investigative case files and reports that pertain to environmental, health, and safety topics, cases or concerns. NCRs created for the CCP RH sites which document the process for identifying, documenting, controlling, evaluating, and dispositioning nonconforming items. May include Carlsbad Field Office (CBFO) notifications and supporting documentation such as copies of applicable procedures, etc. May include Attachment 2, CCP Records Transmittal/Receiving Form(s).</p> <p>QA Record/Nonpermanent/Validated by authorized signature and date.</p> <p>Media Type: Hard Copy Filing Order: Alpha-Numeric Inclusive Dates: 2006 to Present Location: CCP Records - SWB and/or WRA</p>	ADM 22.4	Cutoff upon completion of audit or investigation. Destroy when 75 years old.	Retain in CCP Records until completion of characterization process for each site or when no longer needed in project files to support daily functions or audits. Transfer to the WRA within one year for storage and retention
2(b)	<p><u>NCR Log Reconciliation Report</u> NCR Log Reconciliation Report documents and verifies that all NCR numbers at the end of each calendar year are reconciled against the Master Log and in the Nonconformance Report Module (NCRM). Includes as attachment the information from NCR logs. May include Attachment 2, CCP Records Transmittal/Receiving Form(s).</p> <p>QA Record/Nonpermanent/Validated by authorized signature and date.</p> <p>Media Type: Hard Copy Filing Order: Chronologically Inclusive Dates: 2005 to Present Location: CCP Records - SWB and/or WRA</p>	Disposition Authority Pending NARA Approval	UNSCHEDULED -Do Not Destroy-	Retain in CCP Records until completion of characterization process or when no longer needed in project files to support daily functions or audits. Transfer to the WRA for storage and retention.

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Waste Isolation Pilot Plant RECORDS INVENTORY AND DISPOSITION SCHEDULE (RIDS)	1. <input type="checkbox"/> DOE <input checked="" type="checkbox"/> Contractor	2. Page 8 of 39
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6. Item No.	7. Filing Series, Description, and Location of File (If Different from 3c.), and Inclusive Dates	8. Disposition Authority	9. Authorized Disposition Instructions	10. Transfer Instructions
2(c)	<p>CCP RH Corrective Action Reports (CARs) Audit and investigative case files and reports that pertain to environmental, health, and safety topics, cases or concerns. CCP RH CARs created for all RH sites which document the process for identifying, documenting, controlling, evaluating, dispositioning, and verifying completion of corrective actions for conditions adverse to quality related failures, malfunctions, deficiencies, and technical inadequacies. May include supporting documentation such as copies of applicable procedures and/or Deficiency Evaluation Form if applicable, Corrective Action Plan and CBFO Notifications. May include Attachment 2, CCP Records Transmittal/Receiving Form(s).</p> <p>QA Record/Nonpermanent/Validated by authorized signature and date.</p> <p>Media Type: Hard Copy Filing Order: Alpha-Numeric Inclusive Dates: 2006 to Present Location: CCP Records - SWB and/or WRA</p>	ADM 22.4	Cut off upon completion of audit or investigation. Destroy when 75 years old.	Retain in CCP Records until completion of characterization process for each site or when no longer needed in project files to support daily functions or audits. Transfer to the WRA within one year for storage and retention.
2(d)	<p>CCP RH CAR Log Indexes, lists, registers, and other finding aids used only to provide access to records authorized for destruction. CAR log is a document that is used to assign unique CAR numbers. It identifies the numbers assigned for both issued and voided CARs. The numbering system helps to identify the individual CAR number, facility and facility designee number and the calendar year issued.</p> <p>QA Record/Nonpermanent/Validated by authorized signature and date.</p> <p>Media Type: Hard Copy/Electronic Filing Order: Chronologically Inclusive Dates: 2006 to Present Location: CCP Records - SWB and/or WRA</p>	ADM 23.9	Destroy or delete with the related records.	Print out at the end of each calendar year. Retain in CCP Records until completion of characterization process for each site or when no longer needed in project files to support daily functions or audits. Transfer to the WRA within one year for storage and retention.

Waste Isolation Pilot Plant RECORDS INVENTORY AND DISPOSITION SCHEDULE (RIDS)	1. <input type="checkbox"/> DOE <input checked="" type="checkbox"/> Contractor	2. Page 9 of 39
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6. Item No.	7. Filing Series, Description, and Location of File (If Different from 3c.), and Inclusive Dates	8. Disposition Authority	9. Authorized Disposition Instructions	10. Transfer Instructions
2(e)	<p><u>CCP RH Trend Reports</u> Audit and investigative case files and reports that pertain to environmental, health, and safety topics, cases or concerns. CCP RH Trend Reports are a review and evaluation of NCRs and CARs generated during the designated reporting period. Reports show negative trends such as quantities of NCRs or CARs generated by site, quantities and types of NCRs/CARs by process, identification of types of nonconformance by process, and programmatic noncompliance by trend codes.</p> <p>QA Record/Nonpermanent/Validated by authorized signature and date.</p> <p>Media Type: Hard Copy Filing Order: Chronologically Inclusive Dates: 2006 to Present Location: CCP Records - SWB and/or WRA</p>	ADM 22.4	Cut off upon completion of audit or investigation. Destroy when 75 years old.	Retain in CCP Records until completion of characterization process for each site or when no longer needed in project files to support daily functions or audits. Transfer to the WRA within one year for storage and retention.
3	<p><u>CCP RH OPERATION LOGBOOKS</u> Logbooks listing significant action, daily surveillances and maintenance activities occurring during normal operations of applicable facility. Operational Logbooks are used for CCP RH personnel to document technical work processes and daily activities during characterization activities. May include Attachment 2, CCP Records Transmittal/Receiving Form(s).</p> <p>QA Record/Nonpermanent/Validated by authorized signature and date.</p> <p>Media Type: Hard Copy Filing Order: Alpha-Numeric Inclusive Dates: 2006 to Present Location: CCP Records - SWB and/or WRA</p>	ENV 1.e.6	Destroy when 75 years old.	Retain in CCP Records until completion of characterization process for each site or when no longer needed in project files to support daily functions or audits. Transfer to the WRA within one year for storage and retention.

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6. Item No.	7. Filing Series, Description, and Location of File (If Different from 3c.), and Inclusive Dates	8. Disposition Authority	9. Authorized Disposition Instructions	10. Transfer Instructions
4	<p><u>CCP QA SUMMARY REPORTING, ASSESSMENT/AUDIT, AND SURVEILLANCE DOCUMENTATION</u> QA documentation pertaining to the reporting, assessment/audit, and surveillance activities of the CCP RH QA program.</p>			
4(a)	<p><u>CCP RH Surveillance Program Documentation</u> Audit and investigative case files and reports that pertain to environmental, health, and safety topics, cases, or concerns. Documentation pertaining to the planning, performing, documenting, and reporting independent surveillances of TRU CCP RH waste characterization activities. Includes surveillance plan formats, surveillance reports, and surveillance checklists. May include supporting documentation. May include Attachment 2, CCP Records Transmittal/Receiving Form(s).</p> <p>QA Record/Nonpermanent/Validated by authorized signature and date.</p> <p>Media Type: Hard Copy Filing Order: Alpha-Numeric Inclusive Dates: 2006 to Present Location: CCP Records - SWB and/or WRA</p>	ADM 22.4	Cut off upon completion of audit or investigation. Destroy when 75 years old.	Retain in CCP Records until completion of characterization process for each site or when no longer needed in project files to support daily functions or audits. Transfer to the WRA within one year for storage and retention.

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6. Item No.	7. Filing Series, Description, and Location of File (If Different from 3c.), and Inclusive Dates	8. Disposition Authority	9. Authorized Disposition Instructions	10. Transfer Instructions
4(b)	<p><u>CCP RH Surveillance Log</u> Indexes, lists, registers, and other finding aids used only to provide access to records authorized for destruction, EXCLUDING records containing abstracts or other information that can be used as an information source apart from the related records.. CCP RH Surveillance log is a document that is used to assign unique surveillance numbers. The numbering system helps to identify the individual surveillance number, facility and facility designee number and the calendar year issued.</p> <p>QA Record/Nonpermanent/Validated by authorized signature and date.</p> <p>Media Type: Hard Copy/Electronic Filing Order: Chronologically Inclusive Dates: 2006 to Present Location: CCP Records - SWB and/or WRA</p>	ADM 23.9	Destroy or delete with the related records.	Print out at the end of each calendar year. Retain in CCP Records until completion of characterization process for each site or when no longer needed in project files to support daily functions or audits. Transfer to the WRA within one year for storage and retention.

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6. Item No.	7. Filing Series, Description, and Location of File (If Different from 3c.), and Inclusive Dates	8. Disposition Authority	9. Authorized Disposition Instructions	10. Transfer Instructions
5	<p><u>CCP RH TRANSURANIC (TRU) SOFTWARE QA (SOA) Documentation</u> Database system development records and documentation records which support the maintenance and operation of tracking systems. CCP RH TRU SQA documentation pertains to the development, procurement, maintenance, and use of computer software that is important to the waste characterization and certification for the CCP RH. Includes but not limited to the following documentation for: Exempt Software, Commercial Off the Shelf (COTS) Software, Application within COTS, Qualified Supplier Software, Non-Qualified Supplier Software, CCP Software. May include Attachment 2, CCP Records Transmittal/Receiving Form(s).</p> <p>QA Record/Nonpermanent/Validated by authorized signature and date.</p> <p>Media Type: Hard Copy Filing Order: Site and Alphabetically by Software Name Inclusive Dates: 2006 to Present Location: CCP Records – SWB and/or WRA</p>	ENV 1.g.3.b	Destroy or delete upon authorized deletion of related system.	Retain in CCP Records until completion of characterization process for each site or when no longer needed in project files to support daily functions or audits. Transfer to the WRA within one year for storage and retention.
6	<p><u>CCP RH VISUAL EXAMINATION (VE) BATCH DATA REPORTS (BDR)</u> VE constitutes opening a container and physically examining its contents and verifying its physical form. VE is also used to confirm that the physical form of the waste matches its waste stream description. Removal of prohibited items can be performed in this process.</p>			

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6. Item No.	7. Filing Series, Description, and Location of File (If Different from 3c.), and Inclusive Dates	8. Disposition Authority	9. Authorized Disposition Instructions	10. Transfer Instructions
6(a)	<p><u>CCP RH VE BDRs</u> CCP RH VE BDRs document the physical form of the waste and absence of prohibited items and is performed at the time the waste is actually being placed into the waste container or of video media. BDRs will include but not limited to the following: VE Data Form(s), VE Independent Technical Reviewer (ITR) Checklist, VE Site Project Manager (SPM) Checklist, VE BDR Cover Sheet, VE BDR Table of Contents, and copy of NCR if applicable. May include Attachment 2, CCP Records Transmittal/Receiving Form(s).</p> <p>QA Record/Lifetime/Validated by authorized signature and date.</p> <p>Media Type: Hard Copy Filing Order: Alpha-Numeric Inclusive Dates: 2006 to Present Location: CCP Records - SWB and/or WRA</p>	Disposition Authority Pending NARA Approval	UNSCHEDULED -Do Not Destroy-	Retain in CCP Records until completion of characterization process for each site or when no longer needed in project files to support daily functions or audits. Transfer to the WRA within one year for storage and retention.
6(b)	<p><u>CCP RH Audio/Visual Recording DVD for VE</u> Audio/visual recorded DVDs created for previously packaged waste. VE review is performed using this historical audio/visual media. May include Attachment 2, CCP Records Transmittal/Receiving Form(s).</p> <p>QA Record/Nonpermanent/Validated by authorized signature and date.</p> <p>Media Type: Audio/Visual DVDs Filing Order: Alpha-Numeric Inclusive Dates: 2006 to Present Location: CCP Records - SWB and/or WRA</p>	Disposition Authority Pending NARA Approval	UNSCHEDULED -Do Not Destroy-	Retain in CCP Records until completion of characterization process for each site or when no longer needed in project files to support daily functions or audits. Transfer to the WRA within one year for storage and retention.

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6. Item No.	7. Filing Series, Description, and Location of File (If Different from 3c.), and Inclusive Dates	8. Disposition Authority	9. Authorized Disposition Instructions	10. Transfer Instructions
6(c)	<p>CCP RH VE Quarterly Reports Environmental monitoring reports provided to identify the progress on the environmental monitoring plans or on other related subjects. VE quarterly reports pertain to the quarterly review performed on randomly selected data completed through SPM review, within the last 3 months. The reports give information regarding the repeat of data generation level review, Validation & Verification (V&V) performed on a minimum of one randomly chosen waste container each quarter. The SPM uses this information to document that the data generation level data review is being performed according to procedures. This includes the request and results correspondence. May include Attachment 2, CCP Records Transmittal/Receiving Form(s).</p> <p>QA Record/Lifetime/Validated by authorized signature on memorandum.</p> <p>Media Type: Hard Copy Filing Order: Chronological and Quarter Number Inclusive Dates: 2007 to Present Location: CCP Records - SWB and/or WRA</p>	ENV 1.d.8.a	Destroy when 75 years old. Cutoff when reports are superseded, obsolete, or canceled.	Retain in CCP Records until completion of characterization process for each site or when no longer needed in project files to support daily functions or audits. Transfer to the WRA within one year for storage and retention.
7	<p>CCP RH DOSE-to-CURIE (DTC) DOCUMENTATION DTC Process is used to determine the total TRU activity concentrations and the individual isotopic activity in containers of RH TRU waste. Various calibrated probes are used to determine the gamma dose rate.</p>			

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7(a)	<p><u>CCP RH Waste DTC BDR</u> CCP RH Waste DTC BDRs are assembled data that is generated during the process and compiled to create a BDR package. The BDR includes the following: Measurement Control Report, Container Data Sheet(s), Waste Container DTC Conversion Record(s), Cover Sheet, Table of Contents, Narrative Summary, ITR Checklist, SPM Checklist and copy of NCRs if applicable. May include Attachment 2, CCP Records Transmittal/Receiving Form(s).</p> <p>QA Record/Lifetime/Validated by authorized signature and date.</p> <p>Media Type: Hard Copy Filing Order: Alpha-Numeric Inclusive Dates: 2006 to Present Location: CCP Records - SWB and/or WRA</p>	Disposition Authority Pending NARA Approval	UNSCHEDULED -Do Not Destroy-	Retain in CCP Records until completion of characterization process for each site or when no longer needed in project files to support daily functions or audits. Transfer to the WRA within one year for storage and retention.
7(b)	<p><u>CCP RH Waste Container DTC Conversion Record</u> CCP RH Waste Container DTC Conversion Record is the electronic file created during the DTC process. May include Attachment 2, CCP Records Transmittal/Receiving Form(s).</p> <p>QA Record/Nonpermanent/Validated by authorized signature and date on associated BDR.</p> <p>Media Type: Electronic - CD Filing Order: Alpha-Numeric Inclusive Dates: 2006 to Present Location: CCP Records - SWB and/or WRA</p>	Disposition Authority Pending NARA Approval	UNSCHEDULED -Do Not Destroy-	Retain in CCP Records until completion of characterization process for each site or when no longer needed in project files to support daily functions or audits. Transfer to the WRA within one year for storage and retention.
8	<p><u>CCP RH SAMPLING and ANALYSIS OF GAS SAMPLES BDRs</u> CCP RH Sampling and Analysis of Gas Samples BDRs are reports that document the analysis of gas samples of Volatile Organic Compounds (VOCs) in Headspace Gas (HSG) samples contained in SUMMA® canisters.</p>			

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6. Item No.	7. Filing Series, Description, and Location of File (If Different from 3c.), and Inclusive Dates	8. Disposition Authority	9. Authorized Disposition Instructions	10. Transfer Instructions
8(a)	<p>CCP RH Analysis of Gas Samples BDRs CCP RH Analysis of Gas Samples BDRs are reports that document the analysis of gas samples of VOCs in HSG samples contained in SUMMA® canisters. May include but not limited to the following: Data Report Cover page and Table of Contents, Sample Identification Table/Analysis Request Form, Sample Custody Documents and Sample Tags, Sample Results, Quality Control (QC) Measurement Results, Calibration Results, and Data Review Checklists and SPM Project Level Checklist. May include Attachment 2, CCP Records Transmittal/Receiving Form(s).</p> <p>QA Record/Lifetime/Validated by authorized signature and date.</p> <p>Media Type: Hard Copy Filing Order: Alpha-Numeric Inclusive Dates: 2006 to Present Location: CCP Records - SWB and/or WRA</p>	Disposition Authority Pending NARA Approval	UNSCHEDULED -Do Not Destroy-	Retain in CCP Records until completion of characterization process for each site or when no longer needed in project files to support daily functions or audits. Transfer to the WRA within one year for storage and retention.

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8(b)	<p><u>CCP RH HSG BDRs - Summa Sampling</u> CCP HSG - Summa BDRs that are processed both at data generation level through Project Level V&V in the HSG-Summa Sampling process. May includes but not limited to the following: Cover Sheet, Table of Contents, HSG ITR Checklist, HSG Technical Supervisor (TS) Review checklist, HSG Facility QA Officer Review Checklist, 72-hour Temperature Equilibration Plots, Chain-of-Custody/Canister Tag, Sample Drum Data Form, Shipment Request Form (or equivalent), and copy of NCR(s) if applicable. Also includes SPM Checklists. May include Attachment 2, CCP Records Transmittal/Receiving Form(s).</p> <p>QA Record/Lifetime/Validated by authorized signature and date.</p> <p>Media Type: Hard Copy Filing Order: Alpha-Numeric Inclusive Dates: March 2004 to Present Location: CCP Records - SWB and/or WRA</p>	Disposition Authority Pending NARA Approval	UNSCHEDULED -Do Not Destroy-	Retain in CCP Records until completion of characterization process for each site or when no longer needed in project files to support daily functions or audits. Transfer to the WRA within one year for storage and retention.
8(c)	<p><u>CCP RH HSG Transportation BDRs</u> CCP RH HSG Transportation BDRs pertain to the process that implements the process to establish the concentration of flammable gas/VOCs, hydrogen, and methane in a waste container intended for shipment in the TRU Package Transporter-II, (TRUPACT-II) or HalfPACT Packaging. May include Attachment 2, CCP Records Transmittal/Receiving Form(s).</p> <p>QA Record/Lifetime/Validated by authorized signature and date.</p> <p>Media Type: Hard Copy Filing Order: Alpha-Numeric Inclusive Dates: 2006 to Present Location: CCP Records - SWB and/or WRA</p>	Disposition Authority Pending NARA Approval	UNSCHEDULED -Do Not Destroy-	Retain in CCP Records until completion of characterization process for each site or when no longer needed in project files to support daily functions or audits. Transfer to the WRA within one year for storage and retention.

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6. Item No.	7. Filing Series, Description, and Location of File (If Different from 3c.), and Inclusive Dates	8. Disposition Authority	9. Authorized Disposition Instructions	10. Transfer Instructions
8(d)	<p><u>CCP RH HSG Transportation Initial Calibration (ICAL)</u> This document which is the ICAL report for the process that implements the process to establish the concentration of flammable VOCs, hydrogen and methane in a waste container intended for shipment in the TRUPACT-II or HalfPACT packaging. May include Attachment 2, CCP Records Transmittal/Receiving Form(s).</p> <p>QA Record/Nonpermanent/Validated by authorized signature and date.</p> <p>Media Type: Hard Copy Filing Order: Alpha-Numeric Inclusive Dates: 2006 to Present Location: CCP Records - SWB and/or WRA</p>	Disposition Authority Pending NARA Approval	UNSCHEDULED -Do Not Destroy-	Retain in CCP Records until completion of characterization process for each site or when no longer needed in project files to support daily functions or audits. Transfer to the WRA within one year for storage and retention.
8(e)	<p><u>CCP RH HSG Transportation Method Determination Level (MDL) Reports</u> MDL Reports is documentation that supports the process that describes and implements the process to establish the concentration of flammable gas/VOCs, hydrogen and methane in a waste container intended for shipment in the TRUPACT-II or HalfPACT packaging. May include Attachment 2, CCP Records Transmittal/Receiving Form(s).</p> <p>QA Record/Nonpermanent/Validated by authorized signature and date.</p> <p>Media Type: Hard Copy Filing Order: Alpha-Numeric Inclusive Dates: 2006 to Present Location: CCP Records - SWB and/or WRA</p>	Disposition Authority Pending NARA Approval	UNSCHEDULED -Do Not Destroy-	Retain in CCP Records until completion of characterization process for each site or when no longer needed in project files to support daily functions or audits. Transfer to the WRA within one year for storage and retention.

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6. Item No.	7. Filing Series, Description, and Location of File (If Different from 3c.), and Inclusive Dates	8. Disposition Authority	9. Authorized Disposition Instructions	10. Transfer Instructions
8(f)	<p><u>CCP RH HSG Random Sample Selection Memorandums</u> HSG Random Selection Memorandum document the random selection for HSG sampling and analysis. It includes at a minimum a memorandum identifying the random selection with attached HSG Random Sample Selection Listing.</p> <p>QA Record/Nonpermanent/Validated by authorized signature/initial and date.</p> <p>Media Type: Hard Copy Filing Order: Chronological and Waste Stream Number Inclusive Dates: 2006 to Present Location: CCP Records - SWB and/or WRA</p>	Disposition Authority Pending NARA Approval	UNSCHEDULED -Do Not Destroy-	Retain in CCP Records until completion of characterization process for each site or when no longer needed in project files to support daily functions or audits. Transfer to the WRA within one year for storage and retention.
8(g)	<p><u>CCP RH HSG Quarterly Reports</u> Environmental monitoring reports provided to identify the progress on the environmental monitoring plans or on other related subjects. HSG quarterly reports pertain to the quarterly review performed on HSG data. The reports give information regarding the repeat of data generation level review. V&V performed on a minimum of one randomly chosen waste container each quarter. The SPM uses this information to document that the data generation level data review is being performed according to procedures. This includes the request and results correspondence.</p> <p>QA Record/Lifetime/Validated by authorized signature/initial and date.</p> <p>Media Type: Hard Copy Filing Order: Chronological Inclusive Dates: 2006 to Present Location: CCP Records - SWB and/or WRA</p>	ENV 1.d.8.a	Destroy when 75 years old. Cutoff when reports are superseded, obsolete, or canceled.	Retain in CCP Records until completion of characterization process for each site or when no longer needed in project files to support daily functions or audits. Transfer to the WRA within one year for storage and retention.

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6. Item No.	7. Filing Series, Description, and Location of File (If Different from 3c.), and Inclusive Dates	8. Disposition Authority	9. Authorized Disposition Instructions	10. Transfer Instructions
9	<p><u>FIELD REFERENCE STANDARD (FRS) MEMORANDUM</u> FRS Memorandum is collected to assess the accuracy with which the sampling equipment collects the VOC into SUMMA canisters. The FRS is collected with the first sampling event at a newly certified site and analyzed. The FRS shall contain a minimum of six analytes at concentrations within a range of 10 to 100 ppmv greater than the MDL for each compound.</p> <p>QA Record/Lifetime/Validated by authorized signature/initial and date.</p> <p>Media Type: Hard Copy Filing Order: Chronological Inclusive Dates: 2008 to Present Location: CCP Records - SWB and/or WRA</p>	Disposition Authority Pending NARA Approval	UNSCHEDULED -Do Not Destroy-	Retain in CCP Records until completion of characterization process for each site or when no longer needed in project files to support daily functions or audits. Transfer to the WRA within one year for storage and retention.
10	<p><u>SOLIDS SAMPLING BDRs</u> Documentation pertaining to the process of Solids Sampling which is the random sample collection and sample data collection.</p>			

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6. Item No.	7. Filing Series, Description, and Location of File (If Different from 3c.), and Inclusive Dates	8. Disposition Authority	9. Authorized Disposition Instructions	10. Transfer Instructions
10(a)	<p><u>Solids Sampling BDRs</u> Documentation pertaining to the process of Solids Sampling which is the random sample collection and sample data collection. The BDR may include but is not limited to the following: Sample Tracking Form, Sample Chain-of-Custody Form, Sampling ITR Checklist, Sampling TS Review Checklist, Sampling Facility QA Officer (FQAO) Review Checklist, Sampling BDR - Table of Contents, Solids Sampling BDR - Cover Sheet, Copy of CCP Waste VE Technique Data Form, Copy of NCR(s) if applicable, Temperature Data Logger Sheets, Certification of Cleanliness for Sampling Equipment, and V&V checklists. May include Attachment 2, CCP Records Transmittal/Receiving Form(s).</p> <p>QA Record/Lifetime/Validated by authorized signature and date.</p> <p>Media Type: Hard Copy Filing Order: Alpha-Numeric Inclusive Dates: 2008 to Present Location: CCP Records - SWB and/or WRA</p>	Disposition Authority Pending NARA Approval	UNSCHEDULED -Do Not Destroy-	Retain in CCP Records until completion of characterization process for each site or when no longer needed in project files to support daily functions or audits. Transfer to the WRA within one year for storage and retention.

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10(b)	<p><u>Solids Analysis BDRs – Analytical Laboratories Department (ALD)</u> Analytical laboratory data packages consisting of documentation generated during transport and receipt of field samples, sample movement in the laboratory, preparation for analysis, laboratory analyses output, raw and processed data, analytical results, reanalysis, QC sample results and instrument calibration data, plus a summary of final results for each batch. CCP RH Analysis of Solid Sample BDRs are reports that document the analysis of solid samples of VOC, non-halogenated volatile compounds (NHVOC), semi-volatile compounds (SVOC), Metals, Actinides; Gamma; Inductively-Coupled Plasma Mass Spectrometry (ICP-MS), Liquid Scintillation Counting (LSC); Radiochemistry Analysis; and Radiostrontium. May include but not limited to the following: Data Report, Cover Page, Table of Contents, Sample Custody Documents, Sample Results, QC Results, Calibration Results, Data Review Checklists and SPM Project Level Checklist. May also include Attachment 2, CCP Records Transmittal/Receiving Form(s).</p> <p>QA Record/Lifetime/Validated by authorized signature and date.</p> <p>Media Type: Hard Copy Filing Order: Alpha-Numeric Inclusive Dates: 2008 to Present Location: CCP Records - SWB and/or WRA</p>	ENV 5.c.1	Destroy in 75 years.	Retain in CCP Records until completion of characterization process for each site or when no longer needed in project files to support daily functions or audits. Transfer to the WRA within one year for storage and retention.

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10(c)	<p><u>CCP Solid Analysis BDRs – Raw Data Supporting Data Package</u> CCP RH Solid Analysis BDRs raw data supporting data packages that document the analysis of VOC, NHVOC, SVOC and metals in solid analysis. These packages may contain but are not limited to the following: Raw Data/Instrument Printouts, copies of applicable pages of Digestion Record and copies of applicable pages of logbooks. May include Attachment 2, CCP Records Transmittal/Receiving Form(s).</p> <p>QA Record/Nonpermanent/Validated by authorized signature and date.</p> <p>Media Type: Hard Copy Filing Order: Alpha-Numeric Inclusive Dates: 2008 to Present Location: CCP Records - SWB and/or WRA</p>	Disposition Authority Pending NARA Approval	UNSCHEDULED -Do Not Destroy-	Retain in CCP Records until completion of characterization process for each site or when no longer needed in project files to support daily functions or audits. Transfer to the WRA within one year for storage and retention.
10(d)	<p><u>Solids Sampling Random Selection Memorandum</u> Solids Sampling Random Selection Memorandums document the random selection for solids sampling and analysis. It includes at a minimum a memorandum identifying the random selection with attached Solids Random Sample List/Waste Stream Container List.</p> <p>QA Record/Nonpermanent/Validated by authorized signature/initial and date.</p> <p>Media Type: Hard Copy Filing Order: Chronological Inclusive Dates: 2006 to Present Location: CCP Records - SWB and/or WRA</p>	Disposition Authority Pending NARA Approval	UNSCHEDULED -Do Not Destroy-	Retain in CCP Records until completion of characterization process for each site or when no longer needed in project files to support daily functions or audits. Transfer to the WRA within one year for storage and retention.

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10(e)	<p><u>Completed Chain-of-Custody Forms</u> These data packages consist of documentation generated during transport and receipt of field samples, sample movement in the laboratory, preparation for analysis, laboratory analyses output, raw and processed data, analytical results, reanalysis, quality control sample results and instrument calibration data, plus a summary of final results for each batch. Chain-of-Custody Forms which have been completed document all transfers of sample custody from collection to disposal. The form contains at a minimum, the sample numbers, the date and times of transfers, and the signatures of the relinquishing and accepting parties. May include Attachment 2, CCP Records Transmittal/Receiving Form(s).</p> <p>QA Record/Lifetime/Validated by authorized signature and date.</p> <p>Media Type: Hard Copy Filing Order: Alpha-Numeric Inclusive Dates: 2008 to Present Location: CCP Records - SWB and/or WRA</p>	ENV 5.c.1	Destroy in 75 years.	Retain in CCP Records until completion of characterization process for each site or when no longer needed in project files to support daily functions or audits. Transfer to the WRA within one year for storage and retention.
11	<p><u>CCP RH ACCEPTABLE KNOWLEDGE (AK) DOCUMENTATION</u> AK Documentation supports the knowledge used for waste characterization, which is based on the materials and processes used to generate a waste. AK includes information about the physical form of the waste, the base materials composing the waste (especially hazardous and radioactive materials) and the process that generated the waste. AK is used to define waste streams, assign summary categories, assign U.S. Environmental Protection Agency (EPA) hazardous waste numbers, estimate the weight fraction of cellulose, plastic, and rubber (CPR), and estimated isotopic ratios.</p>			

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6. Item No.	7. Filing Series, Description, and Location of File (If Different from 3c.), and Inclusive Dates	8. Disposition Authority	9. Authorized Disposition Instructions	10. Transfer Instructions
11(a)	<p><u>CCP RH AK Documentation</u> AK documentation is compiled, reviewed, evaluated, confirmed and reported. It supports the related AK Summary Report. The following documentation may include but is not limited to: AK Documentation Checklist; Record of Communication; AK Source Document Summary - Attachments 3's- may include attached CCP generated source documents - prior to 11/01/2010 the Attachment 3's included as attachment both the site generated and CCP generated source documents; AK Source Document Reference List; Hazardous Constituents Waste Form(s); Waste Form, Waste Material Parameters, Prohibited Items and Packaging Forms with Waste Material Parameter Evaluation Memorandum; Radionuclides Forms - may include Nondestructive Assay (NDA) Memorandum; Waste Containers List - may have additional Memorandums as addendums to the Attachment 8; Acceptable Knowledge Re-evaluation Checklist; AK Source Document Discrepancy Resolution - includes AK Source Document Source Summary Forms as attachments; CCP Waste Stream Characterization Checklist; CCP TRU Waste Correlation and Surrogate Summary Form; AK Sufficiency Determination Request - memorandum and SPM notifications (emails, letters, memorandums, etc.), as applicable. May include Attachment 2, CCP Records Transmittal/Receiving Form(s).</p> <p>QA Record/Lifetime/Validated by authorized signature/initial and date.</p> <p>Media Type: Hard Copy Filing Order: By Site and AK Report or AK Library Inclusive Dates: 2006 to Present Location: CCP Records - SWB and/or WRA</p>	Disposition Authority Pending NARA Approval	UNSCHEDULED -Do Not Destroy-	Retain in CCP Records until completion of characterization process for each site or when no longer needed in project files to support daily functions or audits. Transfer to the WRA within one year for storage and retention.

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6. Item No.	7. Filing Series, Description, and Location of File (If Different from 3c.), and Inclusive Dates	8. Disposition Authority	9. Authorized Disposition Instructions	10. Transfer Instructions
11(b)	<p><u>AK Historical Source Documents</u> AK historical source documents are external records that have been generated by the waste generating sites. Copies are collected and assigned a unique tracking number and listed on the Attachment 4, AK Source Document Reference List from CCP-TP-005. They may be categorized as follows: Correspondence; Documents; Miscellaneous; Procedures and Published Documents; Discrepancy Resolution; and Unpublished Documents.</p> <p>Media Type: Electronic - PDF files, databases, video Filing Order: Site, AK Report or AK Library -Alpha-numeric Inclusive Dates: November 2010 to Present Location: CCP Records - SWB and/or WRA</p>	Disposition Authority Pending NARA Approval	UNSCHEDULED -Do Not Destroy-	Retain in CCP Records until completion of characterization process for each site or when no longer needed in project files to support daily functions or audits. Transfer with related AK Record Set. Transfer to the WRA within one year for storage and retention.
11(c)	<p><u>CCP RH AK Summary Reports</u> Hazardous waste reports, hazardous substance reports, waste characterization reports, Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)/Resource Conservation and Recovery Act (RCRA) unit reports. CCP RH AK Summary Reports are documentation which supports the knowledge used for waste characterization, which is based on the materials and processes used to generate a waste. AK reports include information about the physical form of the waste, the base materials composing the waste (especially hazardous and radioactive materials) and the process that generated the waste. AK reports define waste streams, assign summary categories, assign EPA hazardous waste numbers, estimate the weight fraction of CPR, and estimated isotopic ratios.</p> <p>QA Record/Lifetime/Validated by authorized signature and date.</p> <p>Media Type: Hard Copy Filing Order: Alpha-Numeric Inclusive Dates: 2006 to Present Location: CCP Records - SWB and/or WRA</p>	ENV 1.d.10.a	Permanent. Cutoff when waste is disposed of. Transfer to NARA 25 years after cutoff.	Retain in CCP Records until completion of characterization process for each site or when no longer needed in project files to support daily functions or audits. Transfer to the WRA within one year for storage and retention.

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6. Item No.	7. Filing Series, Description, and Location of File (If Different from 3c.), and Inclusive Dates	8. Disposition Authority	9. Authorized Disposition Instructions	10. Transfer Instructions
11(d)	<p><u>AK Accuracy Report</u> AK Accuracy Reports document that the AK accuracy is evaluated either on a lot or waste stream basis. The report documents the results of the evaluation for container in a waste stream. It may include but is not limited to Inter-Office Correspondence with attached CCP AK Accuracy Report and CCP Correlation of Containers Identification Numbers to BDR Numbers.</p> <p>QA Record/Lifetime/Validated by authorized signature and date.</p> <p>Media Type: Hard Copy Filing Order: Site, AK Report and Waste Stream Inclusive Dates: 2008 to Present Location: CCP Records - SWB and/or WRA</p>	Disposition Authority Pending NARA Approval	UNSCHEDULED -Do Not Destroy-	Retain in CCP Records until completion of characterization process for each site or when no longer needed in project files to support daily functions or audits. Transfer to the WRA within one year for storage and retention.

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6. Item No.	7. Filing Series, Description, and Location of File (if Different from 3c.), and Inclusive Dates	8. Disposition Authority	9. Authorized Disposition Instructions	10. Transfer Instructions
11(e)	<p>CCP RH AK QA Equivalency Demonstration Report CCP AK QA Equivalency Demonstration Report is a document that shows the decision process, the criteria for qualifying data through this method, and the criteria used for qualifying the data to demonstrate QA Equivalency. This report ensures RH TRU waste characterization information generated under a historic QA program complies with the applicable Data Quality Objectives (DQOs) and programmatic requirements specified in the RH TRU Waste Characterization Program Implementation Plan (WCPIP). This includes a procedures matrix providing a cross walk that identified the generator site plans and procedures that implement the applicable requirements of the QA Program Document (QAPD). May include Attachment 2, CCP Records Transmittal/Receiving Form(s).</p> <p>QA Record/Lifetime/Validated by authorized signature and date.</p> <p>Media Type: Hard Copy Filing Order: Alpha-Numeric Inclusive Dates: 2007 to Present Location: CCP Records - SWB and/or WRA</p>	Disposition Authority Pending NARA Approval	UNSCHEDULED -Do Not Destroy-	Retain in CCP Records until completion of characterization process for each site or when no longer needed in project files to support daily functions or audits. Transfer to the WRA within one year for storage and retention.

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6. Item No.	7. Filing Series, Description, and Location of File (If Different from 3c.), and Inclusive Dates	8. Disposition Authority	9. Authorized Disposition Instructions	10. Transfer Instructions
11(f)	<p><u>CCP RH AK Characterization Reconciliation Report (CRR)</u> CCP AK CRR is a report that provides the methodology for data reconciliation with the DQOs provided in the WCPIP, following data V&V by the SPM. The reconciliation is performed at the waste stream or waste stream lot level. It includes the following: RH CRR Container Data Work Sheet 1, RH CRR Container Data Sheet 2, RH CRR DQOs, RH CRR QA Objectives (QAOs), RH CRR Cover Sheet, RH CRR Construction Sheet, RH CRR SPM/AKE Comment Sheet, and summary of Radiological Results by Container. May include Attachment 2, CCP Records Transmittal/Receiving Form(s).</p> <p>QA Record/Lifetime/Validated by authorized signature and date.</p> <p>Media Type: Hard Copy Filing Order: Site, AK Summary Report and Lot Number Inclusive Dates: 2006 to Present Location: CCP Records - SWB and/or WRA</p>	Disposition Authority Pending NARA Approval	UNSCHEDULED -Do Not Destroy-	Retain in CCP Records until completion of characterization process for each site or when no longer needed in project files to support daily functions or audits. Transfer to the WRA within one year for storage and retention.
11(g)	<p><u>CCP RH Reconciliation with Data Objective Reports</u> Reconciliation with Data Objective Reports includes the Data Reconciliation and Reporting Routing Sheet, Reconciliation with Data Objective, WIPP Waste Stream Profile, and Characterization Information Summary.</p> <p>QA Record/Lifetime/Validated by authorized signature and date.</p> <p>Media Type: Hard Copy Filing Order: Site, AK Summary Report, Waste Stream Inclusive Dates: 2006 to Present Location: CCP Records - SWB and/or WRA</p>	Disposition Authority Pending NARA Approval	UNSCHEDULED -Do Not Destroy-	Retain in CCP Records until completion of characterization process for each site or when no longer needed in project files to support daily functions or audits. Transfer to the WRA within one year for storage and retention.

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6. Item No.	7. Filing Series, Description, and Location of File (If Different from 3c.), and Inclusive Dates	8. Disposition Authority	9. Authorized Disposition Instructions	10. Transfer Instructions
11(h)	<p><u>CCP RH HSG Summary Data Report</u> HSG Summary Data Report includes the Correlation of Container ID Numbers to HSG Sample ID Number Form, UCL₉₀ Evaluation Form, Data Evaluation Narrative, Waste Steam Lot Tentatively Identified Compounds, and SPM Narrative. It may also include the Radiography/VE Comparison Report (with copy of trending chart).</p> <p>QA Record/Lifetime/Validated by authorized signature and date.</p> <p>Media Type: Hard Copy Filing Order: Site, AK Summary Report, Waste Stream Inclusive Dates: 2006 to Present Location: CCP Records - SWB and/or WRA</p>	Disposition Authority Pending NARA Approval	UNSCHEDULED -Do Not Destroy-	Retain in CCP Records until completion of characterization process for each site or when no longer needed in project files to support daily functions or audits. Transfer to the WRA within one year for storage and retention.
11(i)	<p><u>CCP RH AK Container Tracking Spreadsheet</u> Any electronic or manual system that tracks and produces records of wastes, from cradle to grave, from generator, storage or transported locations, including laboratory processing. AK Container Tracking Spreadsheet is a spreadsheet that identifies the following minimum criterion for each container listed in the waste stream: Container ID, Waste Stream ID, generation date, vent date, change reason, new closure date, new vent date, container type. May include Attachment 2, CCP Records Transmittal/Receiving Form(s).</p> <p>QA Record/Lifetime/Validated by authorized signature and date.</p> <p>Media Type: Electronic Filing Order: Site Inclusive Dates: 2006 to Present Location: CCP Records - SWB and/or WRA</p>	ENV 1.g.3.a	Delete or destroy when related records are destroyed, or 75 years from creation, whichever occurs later.	Print out after completion of waste stream shipment to WIPP. Retain in CCP Records until completion of characterization process for each site or when no longer needed in project files to support daily functions or audits. Transfer to the WRA within one year for storage and retention.

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6. Item No.	7. Filing Series, Description, and Location of File (If Different from 3c.), and Inclusive Dates	8. Disposition Authority	9. Authorized Disposition Instructions	10. Transfer Instructions
12	<p><u>CCP PROCEDURES, PLANS, AND REPORTS</u> Original Controlled procedures, plans, and reports including complete revisions, single page revisions or changes, applicable forms and approval documentation. This line item is separate from AK Summary Reports and the AK QA Equivalency Demonstration Reports.</p> <p>QA Record/Nonpermanent/Validated by authorized signature and date.</p> <p>Media Type: Hard Copy Filing Order: Alpha-Numeric - Procedure Numbers Inclusive Dates: 2006 to Present Location: CCP Records - SWB and/or WRA</p>	Disposition Authority Pending NARA Approval	UNSCHEDULED -Do Not Destroy-	Retain in CCP Records until completion of characterization process for each site or when no longer needed in project files to support daily functions or audits. Transfer to the WRA within one year for storage and retention.
13	<p><u>CCP RH PROCUREMENT RECORDS</u> Procurement records generated in the acquisition of goods and non-personnel services.</p>			

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6. Item No.	7. Filing Series, Description, and Location of File (If Different from 3c.), and Inclusive Dates	8. Disposition Authority	9. Authorized Disposition Instructions	10. Transfer Instructions
13(a)	<p><u>CCP RH Procurement Documentation</u> CCP procurement records that were generated in the acquisition of goods and non-personnel services for RH generator sites. Includes but not limited to the following: Purchase Requisitions/Change Notices; Purchase Orders/Change Notices; Statements of Work; Specifications/Drawings; Qualified Suppliers List (QSL) and attachments; Approval/Variation Requests, and copies of the QA Grading Level Determination Checklist. This is for Quality Level 1 and 2 procurements only.</p> <p>QA Record/Nonpermanent/Validated by authorized signature and date.</p> <p>Media Type: Hard Copy Filing Order: Purchase Order Number Inclusive Dates: 2006 to Present Location: CCP Records - SWB and/or WRA and WTS Procurement</p>	Disposition Authority Pending NARA Approval	UNSCHEDULED -Do Not Destroy-	Retain in CCP Records until completion of characterization process for each site or when no longer needed in project files to support daily functions or audits. Transfer to the WRA within one year for storage and retention.
13(b)	<p><u>CCP RH Receipt Inspection Verification Sheets (RIVS)</u> RIVS and supporting documentation (certificates of analysis/conformance/compliance, calibration certificates, etc.) pertaining to quality source and receipt activities in support of the CCP RH's waste characterization mission. This was named Source Receipt Inspection Verification Sheets (SRIVS) but is now called as titled above - RIVS. May include Attachment 2, CCP Records Transmittal/Receiving Form(s).</p> <p>QA Record/Nonpermanent/Validated by authorized signature and date.</p> <p>Media Type: Hard Copy Filing Order: Alpha-Numeric by Purchase Order Inclusive Dates: 2006 to Present Location: CCP Records - SWB and/or WRA</p>	Disposition Authority Pending NARA Approval	UNSCHEDULED -Do Not Destroy-	Retain in CCP Records until completion of characterization process for each site or when no longer needed in project files to support daily functions or audits. Transfer to the WRA within one year for storage and retention.

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6. Item No.	7. Filing Series, Description, and Location of File (If Different from 3c.), and Inclusive Dates	8. Disposition Authority	9. Authorized Disposition Instructions	10. Transfer Instructions
14	<p>STANDING ORDERS for RH Sites Documentation that is a means management communicates short-term direction to operators and the documented quarterly review of standing orders. Information such as special operations, data collection, plotting process parameters and other similar short-term matters may be included in standing orders. Standing orders are not used to deviate from procedures but supplement procedures until the procedure can be revised. Includes Standing Order Log. May include Attachment 2, CCP Records Transmittal/Receiving Form(s)</p> <p>QA Record/Nonpermanent/Validated by authorized initial/signature and date.</p> <p>Media Type: Hard Copy Filing Order: Alpha-Numeric Inclusive Dates: 2006 to Present Location: CCP Records - SWB and/or WRA</p>	Disposition Authority Pending NARA Approval	UNSCHEDULED -Do Not Destroy-	Retain in office until completion of characterization process for each site. Transmit to CCP Records to be maintained until no longer needed to support audits. Transfer to the WRA within one year for storage and retention.

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6. Item No.	7. Filing Series, Description, and Location of File (If Different from 3c.), and Inclusive Dates	8. Disposition Authority	9. Authorized Disposition Instructions	10. Transfer Instructions
15	<p>CCP RH OPERATOR AIDS Documentation that is used to provide information useful to operators in performing their duties and the semi-annual reviews that operator aids are still necessary and current. Operator aids may be in many forms such as the latest revision of pages out of procedures, hand written notes, and information tags. Operator aids are viewed as a convenience to the operator, not administrative/technical requirements and/or direction. Operator aids assigned unique numbers may supplement approved procedures, but shall not be used in lieu of approved procedures.</p> <p>QA Record/Nonpermanent/Validated by authorized initial/signature and date.</p> <p>Media Type: Hard Copy Filing Order: Alpha-Numeric Inclusive Dates: 2006 to Present Location: CCP Records - SWB and/or WRA</p>	Disposition Authority Pending NARA Approval	UNSCHEDULED -Do Not Destroy-	Retain in office until completion of characterization process for each site. Transmit to CCP Records to be maintained until no longer needed to support audits. Transfer to the WRA within one year for storage and retention.
16	<p>CCP RH WASTE DATA SYSTEM (WDS) FORMERLY WIPP WASTE INFORMATION SYSTEM (WWIS) and TRANSPORTATION DOCUMENTATION The WDS is an on-line database system used to document information pertaining to waste, including but not limited to waste container characterization and certification data, produce reports, record shipment configuration details, disposal locations and disposal dates. Transportation documentation is the transportation packages created during the preparation and transport of drums for burial at the WIPP.</p>			

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6. Item No.	7. Filing Series, Description, and Location of File (If Different from 3c.), and Inclusive Dates	8. Disposition Authority	9. Authorized Disposition Instructions	10. Transfer Instructions
16(a)	<p><u>CCP RH WDS Documentation</u> The WDS is an on-line database system used to document information pertaining to the waste, including but not limited to waste container characterization and certification data, produce reports, record shipment configuration details, disposal locations and disposal dates. CCP RH WDS package is created during the process entering data into the WDS and reporting data on TRU waste. The WDS is a database system that requires input from waste generator sites for shipment of TRU waste payload containers and payload assemblies that are intended for disposal at WIPP. CCP represents all RH sites as the generator and provides input to WDS on behalf of all RH sites. The CCP RH WDS packages contain, but are not limited to spreadsheets, reports, and correspondence associated with data CCP submits to WDS electronically.</p> <p>QA Record/Lifetime/Validated by authorized initial/signature and date.</p> <p>Media Type: Hard Copy Filing Order: Site and WDS Batch Number Inclusive Dates: 2006 to Present Location: CCP Records - SWB and/or WRA</p>	Disposition Authority Pending NARA Approval	UNSCHEDULED -Do Not Destroy-	Retain in CCP Records until completion of characterization process for each site or when no longer needed in project files to support daily functions or audits. Transfer to the WRA within one year for storage and retention.

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6. Item No.	7. Filing Series, Description, and Location of File (If Different from 3c.), and Inclusive Dates	8. Disposition Authority	9. Authorized Disposition Instructions	10. Transfer Instructions
16(b)	<u>Radiological Surveys</u> Radiological Surveys are performed to document levels of radiation, contamination conditions of the containers going through the characterization process for CCP RH. These are external records generated by the generator sites. May include Attachment 2, CCP Records Transmittal/Receiving Form(s). QA Record/Lifetime/Validated by authorized signature and date. Media Type: Hard Copy Filing Order: Rad Survey Number Inclusive Dates: 2006 to Present Location: CCP Records - SWB and/or WRA	Disposition Authority Pending NARA Approval	UNSCHEDULED -Do Not Destroy-	Retain in CCP Records until completion of characterization process for each site or when no longer needed in project files to support daily functions or audits. Transfer to the WRA within one year for storage and retention.
16(c)	<u>Removable Lid Canister (RLC) Loading Forms</u> RLC Loading Forms are completed during the process of loading RH containers into the RLC for shipment in the RH-TRU- 72-B Cask for the CCP. May include Attachment 2, CCP Records Transmittal/Receiving Form(s). QA Record/Lifetime/Validated by authorized signature and date. Media Type: Hard Copy Filing Order: Alpha-Numeric Canister Number Inclusive Dates: 2006 to Present Location: CCP Records - SWB and/or WRA	Disposition Authority Pending NARA Approval	UNSCHEDULED -Do Not Destroy-	Retain in CCP Records until completion of characterization process for each site or when no longer needed in project files to support daily functions or audits. Transfer to the WRA within one year for storage and retention.

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6. Item No.	7. Filing Series, Description, and Location of File (If Different from 3c.), and Inclusive Dates	8. Disposition Authority	9. Authorized Disposition Instructions	10. Transfer Instructions
17	<p><u>TRANSPORTATION DOCUMENTATION</u> TRU shipment records includes records prepared by the waste generator and other related documentation. CCP RH transportation packages created during the preparation and transport of drums for burial at the WIPP. May include but not limited to: Payload Container Transportation Certification Document, Uniform Hazardous Waste Manifest, Public burden Statement, Straight Bill of Lading – Short Form, Land Disposal Restriction Exemption Notification, Dunnage Certification Statement, Container Integrity Checklist and Leak Test Report. May include Attachment 2, CCP Records Transmittal/Receiving Form(s).</p> <p>EPIDEMIOLOGICAL</p> <p>QA Record/Nonpermanent/Validated by authorized signature and date.</p> <p>Media Type: Hard Copy Filing Order: Alpha-Numeric by Shipment Number Inclusive Dates: 2006 to Present Location: CCP Records - SWB and/or WRA</p>	ENV 2.d.4	Destroy after 5 years.	Retain in CCP Records until completion of characterization process for each site or when no longer needed in project files to support daily functions or audits. Transfer to the WRA within one year for storage and retention.
18	<p><u>CONFIGURATION MANAGEMENT DOCUMENTATION for EQUIPMENT</u> Configuration Management documentation for equipment pertains to the control and oversight of CCP Mobile Characterization Equipment (MCE) and transportation equipment.</p>			

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Waste Isolation Pilot Plant RECORDS INVENTORY AND DISPOSITION SCHEDULE (RIDS)	1. <input type="checkbox"/> DOE <input checked="" type="checkbox"/> Contractor	2. Page 38 of 39
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6. Item No.	7. Filing Series, Description, and Location of File (If Different from 3c.), and Inclusive Dates	8. Disposition Authority	9. Authorized Disposition Instructions	10. Transfer Instructions
18(a)	<p><u>Measuring and Test Equipment (M&TE) Documentation</u> M&TE pertains to documents that ensure equipment used for inspection and testing are properly controlled, calibrated, and maintained. This includes but is not limited to the following: notice of Deficiency, Manufacturer's Certificate of Calibrations, Calibration Interval Documentation, Exemptions and Temporary Extensions and Evaluations/Impact Studies using Out-of-Tolerance Evaluations, as applicable. May include Attachment 2, CCP Records Transmittal/Receiving Form(s).</p> <p>QA Record/Nonpermanent/Validated by authorized signature and date.</p> <p>Media Type: Hard Copy Filing Order: Equipment and date Inclusive Dates: 2006 to Present Location: CCP Records - SWB and/or WRA</p>	Disposition Authority Pending NARA Approval	UNSCHEDULED -Do Not Destroy-	Retain in CCP Records until completion of characterization process for each site or when no longer needed in project files to support daily functions or audits. Transfer to the WRA within one year for storage and retention.
18(b)	<p><u>EPA Tier 1 and Tier 2 Documentation</u> Tier 1 and Tier 2 documentation pertains to the characterization change authorization of the EPA approved waste characterization processes for NDA and VE. Tier changes are documented by memorandum which is the notification of the required change to the waste characterization process. May include various supporting documents.</p> <p>QA Record/Nonpermanent/Validated by authorized signature and date.</p> <p>Media Type: Hard Copy Filing Order: Chronological Inclusive Dates: 2006 to Present Location: CCP Records - SWB and/or WRA</p>	Disposition Authority Pending NARA Approval	UNSCHEDULED -Do Not Destroy-	Retain in CCP Records until completion of characterization process for each site or when no longer needed in project files to support daily functions or audits. Transfer to the WRA within one year for storage and retention.

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6. Item No.	7. Filing Series, Description, and Location of File (If Different from 3c.), and Inclusive Dates	8. Disposition Authority	9. Authorized Disposition Instructions	10. Transfer Instructions
19	<p><u>CONTAINER FILTER INSTALLATION FORMS & DRUM INFORMATION SHEETS</u> Container Filter Installation Forms and Drum Information Sheets are generated and completed by the host site at Argonne National Laboratory - East (ANL-E). Container Filter Installation Forms provide container numbers, filter information, Equipment Serial Number and Calibration Due Date. The Drum Information Sheet provides drum numbers, radiation readings, filter information, lid information, and storage cask numbers.</p> <p>QA Record/Lifetime/Validated by authorized signature and date.</p> <p>Media Type: Hard Copy Filing Order: Chronological Inclusive Dates: 2007 to Present Location: CCP Records - SWB and/or WRA</p>	Disposition Authority Pending NARA Approval	UNSCHEDULED -Do Not Destroy-	Retain in CCP Records until completion of characterization process for each site or when no longer needed in project files to support daily functions or audits. Transfer to the WRA within one year for storage and retention.

Appendix C
Redlined A-11-20 Final Audit Report

U.S. DEPARTMENT OF ENERGY
CARLSBAD FIELD OFFICE

FINAL AUDIT REPORT

OF THE

ARGONNE NATIONAL LABORATORY (ANL)
CENTRAL CHARACTERIZATION PROJECT (CCP)

CARLSBAD, NM, AND ARGONNE, IL

AUDIT NUMBER A-11-20
August 2 – 4, 2011

TRU WASTE CHARACTERIZATION AND CERTIFICATION

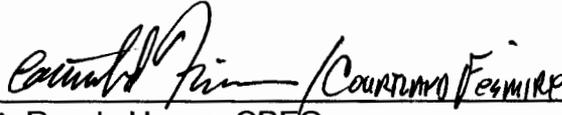


Prepared by:


Greg Knox, CTAC
Audit Team Leader

Date: 21 Dec 2011

Approved by:


Randy Unger, CBFO
Director, Office of Quality Assurance

Date: 10 JAN 2012

1.0 EXECUTIVE SUMMARY

Carlsbad Field Office (CBFO) Recertification Audit A-11-20 was conducted to evaluate the continued adequacy, implementation, and effectiveness of Argonne National Laboratory (ANL) transuranic (TRU) waste characterization activities performed for ANL by the Washington TRU Solutions LLC (WTS) Central Characterization Project (ANL/CCP). Remote-handled (RH) Summary Category Group (SCG) S5000 debris waste characterization and certification activities were reviewed and evaluated for compliance to applicable program requirements. The activities are performed consistent with the requirements described in the Waste Isolation Pilot Plant (WIPP) Hazardous Waste Facility Permit (HWFP), the *Remote-Handled TRU Waste Characterization Program Implementation Plan* (WCPIP), the *CBFO Quality Assurance Program Document* (QAPD), and the *Transuranic Waste Acceptance Criteria for the Waste Isolation Pilot Plant* (WAC).

The audit was conducted simultaneously in Carlsbad, NM, and Argonne, IL, August 2 – 4, 2011. The audit team concluded that overall, the ANL/CCP technical procedures are adequate relative to the flow-down of requirements from the HWFP, the WCPIP, the CBFO QAPD, and the WAC. Additionally, the ANL/CCP technical areas evaluated are satisfactorily implemented and effective.

The audit team concluded that the established quality assurance (QA) program as related to the activities evaluated was adequate for compliance with the CCP *Transuranic Waste Quality Assurance Characterization Project Plan* (QAPJP), and that the associated implementing procedures were satisfactorily implemented and effective.

The audit team identified two concerns during the audit as discussed in the Interim Audit Report issued September 1, 2011. No HWFP-related Conditions Adverse to Quality (CAQs) were identified. The audit team offered one Recommendation to CCP Management.

2.0 SCOPE

The audit team evaluated the continued adequacy, implementation, and effectiveness of the ANL/CCP RH TRU waste characterization and certification activities for RH SCG S5000 debris wastes. The following elements were evaluated.

General Activities

The following general areas from Attachment C6, Section C6-3 of the HWFP were audited.

- Results of previous audits
- Changes in programs or operations
- New programs or activities being implemented
- Changes in key personnel

Technical Activities

Acceptable Knowledge (AK)
Project-level Data Validation and Verification (V&V)
Visual Examination (VE)
Headspace Gas (HSG)
WIPP Waste Information System (WWIS)/Waste Data System (WDS)

Quality Assurance Activities

The following QA elements were evaluated only to the extent needed to support the technical elements listed above.

Control of Nonconforming Items
Personnel Qualification and Training
Quality Assurance Records

The evaluation of ANL/CCP RH TRU waste activities and documents was based on current revisions of the following documents:

- *CBFO Quality Assurance Program Document*, DOE/CBFO-94-1012
- Waste Isolation Pilot Plant Hazardous Waste Facility Permit NM4890139088-TSDF
- *Remote-Handled TRU Waste Characterization Program Implementation Plan*, DOE/WIPP-02-3214
- *Transuranic Waste Acceptance Criteria for the Waste Isolation Pilot Plant*, DOE/WIPP-02-3122
- *CCP Transuranic Waste Characterization Quality Assurance Project Plan*, CCP-PO-001
- *CCP Transuranic Waste Certification Plan*, CCP-PO-002
- *CCP/ANL RH-TRU Waste Interface Document*, CCP-PO-500
- Related technical and QA implementing procedures

3.0 AUDIT TEAM, MANAGEMENT REPRESENTATIVES, AND OBSERVERS

Dennis Miehl	CBFO QA Management Representative
Greg Knox	Audit Team Leader (ATL), CBFO Technical Assistance Contractor (CTAC)
Cindi Castillo	ATL-in-Training, CTAC
Porf Martinez	Auditor, CTAC
Rick Castillo	Auditor, CTAC
Katie Martin	Auditor, CTAC
Dick Blauvelt	Technical Specialist, CTAC
Rhett Bradford	Technical Specialist, CTAC
Paul Gomez	Technical Specialist, CTAC

OBSERVERS

Tom Morgan	CBFO National TRU Program (NTP)
Ricardo Maestas	New Mexico Environment Department (NMED)
Steve Holmes	(NMED)
Connie Walker	(NMED)

4.0 AUDIT PARTICIPANTS

The ANL/CCP individuals contacted during the audit process are identified in Attachment 1. A pre-audit meeting was held by teleconference in Argonne, IL, and Carlsbad, NM, on August 2, 2011. Discussions were conducted with ANL/CCP management and staff to keep them apprised of the audit activities. The audit concluded with a post-audit meeting held by teleconference in Argonne, IL, and Carlsbad, NM, on August 4, 2011.

5.0 SUMMARY OF AUDIT RESULTS

5.1 Program Adequacy and Implementation

This audit was performed to assess the capability of the ANL/CCP to characterize and certify RH SCG S5000 debris waste for compliance with the requirements specified in the HWFP Waste Analysis Plan (WAP). The characterization methods assessed were AK, HSG sampling, and RTR. Other processes evaluated were project-level data V&V, data quality objective (DQO) reconciliation, preparation of Waste Stream Profile Forms (WSPFs), and WWIS/WDS data entry.

The audit team concluded that overall, the applicable ANL/CCP TRU waste characterization activities for RH SCG S5000 debris waste as described in the implementing procedures are adequate, satisfactorily implemented, and effective for compliance with the requirements of the HWFP.

Personnel contacted during the audit by area are listed in Attachment 2. Attachment 3 contains 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 ANL/CCP documents and procedures demonstrating compliance with the HWFP. Attachment 4 is a table of audited documents for the applicable Table C6-1 through C6-6 WAP requirements. Attachment 5 identifies the list of processes and equipment reviewed during the audit. Attachment 6 is the Procedure Revision Matrix, which identifies and briefly describes revisions to the implementing procedures that have occurred since the last ANL/CCP recertification audit (CBFO Audit A-10-23).

5.2 General Activities

5.2.1 Results of Previous Audits

Corrective actions from CBFO Corrective Action Report (CAR) 10-049, generated during Audit A-10-23, were evaluated. The audit team verified that sustained corrective action implementation has been maintained.

5.2.2 Changes in Programs and Operations

Interviews with the ANL/CCP management team indicated there were no significant changes in Programs or Operations since Audit A-10-23.

5.2.3 New Programs or Activities Being Implemented

Interviews with the ANL/CCP management team indicated there were no new programs or activities being implemented since Audit A-10-23.

5.2.4 Changes in Key Personnel

Interviews with the ANL/CCP management team indicated there were no significant changes in key personnel since Audit A-10-23.

5.3 Technical Activities

Each technical area audited is discussed in detail in the following sections. The method used to select objective evidence is discussed, the objective evidence used to assess compliance with the HWFP is cited briefly, and the result of the assessment is provided.

5.3.1 Acceptable Knowledge

The audit team addressed the WAP requirements listed on the C6-3 checklist, along with portions of the C6-1 checklist. Objective evidence was reviewed and compiled to demonstrate compliance with the applicable requirements on these checklists. The audit team also reviewed the AK record in relation to specific and relevant requirements of the WCP/IP, Rev. 2. The waste stream evaluated, designated as AERHDM, originally

consisted of forty-four 30-gallon drums for which ANL/CCP reviewed the VE videotapes of packaging done by ANL staff. Subsequently, the stream was expanded with the packaging of additional debris drums and fuel examination waste (FEW) from the Alpha Gamma Hot Cell Facility (AGHCF), which ANL/CCP personnel have characterized under a certified VE process. In addition, debris waste from the K Wing hot cells has been characterized during packaging and has been added to waste stream AERHDM. The audit team reviewed the projected waste volume for this stream contained in AK Source Document Summary C2025.

The audit team reviewed the latest revision to the AK Summary Report for this waste stream and a copy of the WSPF and attachments. The team also examined numerous AK source documents to establish support for the conclusions noted in the AK Summary Report, particularly with respect to support for the waste stream chemicals and hazardous waste numbers listed in CCP-AK-ANLE-500, Table 5, for operations in both the AGHCF and K Wing hot cells. The audit team also examined the Acceptable Knowledge Documentation Checklist, CCP-TP-005, Attachment 1; the Acceptable Knowledge Source Document Reference List, CCP-TP-005, Attachment 4; the Hazardous Constituents Form, CCP-TP-005, Attachment 5; the Waste Form, Waste Material Parameters, Prohibited Items, and Packaging Form, CCP-TP-005, Attachment 6, along with the applicable justification memo for waste material parameter weight estimates; and the Waste Containers List, CCP-TP-005, 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 also collected and examined, along with screenshots from the item description code database and a copy of the AK Tracking Spreadsheet.

Requisite training records for AK experts (AKEs) and site project managers (SPMs) were examined. The WAP-required traceability exercise was performed for five drums from the population of those that have been completely through the characterization and certification process, including three drums from three distinct HSG sampling lots. In addition to the HSG batch data reports (BDRs), the audit team reviewed the relevant VE BDRs. The estimated waste material parameter weights for this stream and supporting documentation were reviewed. The reconciliation of characterization data with the AK record, including a review of the AK Characterization Checklists, was completed and deemed acceptable.

The audit team also examined the AK record and compiled objective evidence that demonstrates compliance with the requirements of the WCPIP, as noted above. Documents reviewed included the WCPIP-compliant AK Accuracy Report and the Characterization Reconciliation Reports, along with the examination of relevant AK source documents.

The audit team offered one WAP-related Recommendation regarding the submission of the WAP Compliance Tracking Table for new AK WAP requirements, completed and agreed upon during the audit (see section 7.2).

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.

5.3.2 Project-Level Data Validation and Verification

Project level data V&V reviews were performed to assess the data collected as a result of the applicable waste characterization implementing procedures. The ability of the ANL/CCP to characterize RH SCG S5000 debris waste was evaluated. The flow of data from the point of generation to inclusion in the WSPF for each characterization technique was reviewed to ensure that all applicable requirements were captured in the site operating procedures. The material in this section is also addressed in more detail in the applicable C6 checklists questions, where the specific procedures audited and the objective evidence reviewed is identified. Objective evidence was reviewed as part of this assessment and utilized in the completion of the WAP Checklist. The objective evidence included BDRs completed through the CCP SPM review for VE, and HSG sampling and analysis. In addition, procedures were reviewed to ensure that ANL/CCP could adequately perform data reconciliation and properly prepare a WSPF.

Objective evidence was reviewed to make a determination of the adequacy of the SPM V&V procedures. The objective evidence provided included BDRs from each of the waste characterization activities.

Compliance with the characterization requirements was demonstrated through documentation and by demonstration of characterization activities. The project level data V&V process was evaluated by reviewing the following BDRs.

VE

RHANLVE110002 RHANLVE110007 ANLRHVE11008

HSG Sampling and Analysis

ANHSGS100003 ECL10033G ECL10033M

Objective evidence was reviewed to ensure project-level activities were adequately performed to support waste characterization. The audit team reviewed ANL/CCP quarterly data (from all quarters since previous audit) for VE and HSG characterization processes.

The WSPF/characterization information summary (CIS) for the waste stream identified as AERHDM (SCG S5000) was reviewed and found to be properly completed. The HSG random selection of containers for this waste stream was found to be properly completed. Various HSG lots were reviewed, including the most recent, HSG lot number 4.

The ANL/CCP project-level V&V process for VE was evaluated to determine the effectiveness of VE as a characterization method. VE BDRs RHANLVE110002, RHANLVE110007, and ANLRHVE11008 were assessed by the audit team.

ANL/CCP performs HSG sampling using SUMMA[®] canisters. HSG Sampling BDR ANHSGS100003 for SCG S5000 debris waste was examined, and BDRs for HSG analysis (ECL10033G and ECL10033M) were evaluated and verified. Drum age criteria (DAC), sample chain-of-custody (COC), and shipment to the analytical laboratory were reviewed and determined to be compliant. The HSG analysis of the SUMMA[®] samples was reviewed by the team, as well as the training and qualification of ANL/CCP V&V personnel. The analysis and reporting of the Field Reference Standard was completed by the SPM. Sample disposition was found to be adequately performed and documented.

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

5.3.3 Visual Examination

The audit team evaluated the adequacy, implementation, and effectiveness of the ANL/CCP VE characterization process for RH SCG S5000 debris waste.

The audit team reviewed procedures CCP-TP-500, Rev. 11, *CCP Remote-Handled Waste Visual Examination*, and CCP-QP-002, Rev. 29, *CCP Training and Qualification Plan*, to determine their adequacy in addressing upper-tier requirements. The review determined that the procedures adequately address upper-tier requirements. Though ANL/CCP has not performed VE of records since the last audit, A-10-23, procedure CCP-TP-163, Rev. 2, *CCP Evaluation of Waste Packaging Records for Visual Examination of Records*, was also evaluated. The review determined that the procedure adequately addresses upper-tier documents.

ANL/CCP uses the two-operator method when performing VE characterization of newly generated waste. VE is performed by two qualified operators where the waste is visually examined and placed into containers. The audit team evaluated VE operations in the K Wing Hot Cell in building 205. The audit team observed VE operations for container RW48261, containing waste from RH SCG S5000 debris waste stream AERHDM. The audit team interviewed VE operators and VE experts (VEEs). The audit team also examined VE operational logbook RH-ANLE-VE-009 and verified logbook entries were logged correctly and reviewed by the vendor project manager (VPM), as required. At the time of the audit, VE operations were not being performed in the Alpha-Gamma Hot Cell Facility (AGHCF) in building 212.

The audit team examined the following RH VE BDRs generated from operations performed in the K Wing Hot Cell in building 205 and the AGHCF in building 212, to

verify implementation and compliance with the requirements for documenting VE activities, as stipulated in CCP-TP-500:

RHANLVE100009
RHANLVE110003

RHANLVE100013
RHANLVE110007

RHANLVE100016
ANLRHVE11009

The audit team examined training records for ~~seven~~five VE operators/Independent Technical Reviewers, and two SPMs and confirmed the appointment of two ANL/CCP VEEs. The audit team verified that VE operators, Independent Technical Reviewers, and SPMs were appropriately qualified as required.

The audit team evaluated corrective actions from CBFO CAR 10-049 identified during the previous ANL/CCP recertification audit, A-10-23, and verified continued corrective action implementation.

The procedure reviews, field observations, and document reviews provided evidence that the applicable requirements for characterizing RH SCG S5000 debris waste using the Visual Examination process is adequately established for compliance with upper-tier requirements, satisfactory in the implementation of these requirements, and effective in achieving the desired results.

5.3.4 Headspace Gas Sampling

HGS sampling was not being performed during the A-11-20 audit. As HSG sampling is performed sporadically due to the small volume of containers generated at this site, facilities for HSG sampling are not maintained on a permanent basis. BDR ANHSGS100003, which documents the only HSG sampling performed since audit A-10-23, was examined by the team during this audit. This BDR of RH samples from SCG S5000 waste drums included COC, calculation of DAC, temperature equilibration documentation, and sampling BDR preparation, review, and storage activities performed by ANL/CCP.

Overall, the audit team concluded that the Headspace Gas Sampling activities were adequately established for compliance with upper-tier requirements, satisfactory in the implementation of these requirements, and effective in achieving the desired results.

5.4 Quality Assurance Activities

The audit team evaluated the QA elements for personnel qualification and training, quality assurance records, and control of nonconformances to applicable upper-tier requirements. The methods used to select objective evidence are discussed, the objective evidence used to assess compliance with the HWFP is cited briefly (and in detail on the checklists), and the results of the assessment are provided. The evaluation results for each area audited are described below.

5.4.1 Control of Nonconforming Items

The audit team interviewed the resident quality assurance engineer and selected all seventy-eight ANL nonconformance reports (NCRs) generated since Audit A-10-23, to confirm that deficiencies are being appropriately documented and tracked through resolution as required. The following NCRs were reviewed during the audit:

- NCR-RHANL-0501-10
- NCR-RHANL-0502-10
- NCR-RHANL-0503-10
- NCR-RHANL-0504-10
- NCR-RHANL-0400-11
- NCR-RHANL-2343-11
- NCR-RHANL-2254-11
- NCR-RHANL-2255-11

The audit team confirmed that at the time of the audit, there were no NCRs that required reporting to the Permittee within the 7-day reporting requirement. All NCRs were verified as being managed and tracked in the CCP data center and on the 2010-2011 CCP NCR Logs. Further evaluations included review of the RHANL NCR Log Reconciliation Reports for 2010.

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

5.4.2 Personnel Qualification 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, AK, and site project management were examined to verify implementation of associated requirements and to verify that personnel performing characterization activities are appropriately qualified. Record reviews included qualification cards, appointment letters, and other associated qualification documentation, including attendance sheets for required briefings on AK waste stream summary training 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.

5.4.3 Quality Assurance 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 address upper-tier requirements. The procedure review included CCP-PO-001, Rev. 20, *CCP Transuranic Waste Characterization Quality Assurance Project Plan*; CCP-QP-008, Rev. 18, *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 (All Sites) Records Inventory and Disposition Schedule (RIDS) dated 2/21/11. No concerns were identified.

Additional ANL/CCP records retrieved and reviewed during the audit included completed lessons learned required readings and the Lot 4 HSG Data Summary Report for Waste Stream AERDNM.

The procedures reviewed and objective evidence assembled and evaluated during the audit provided evidence that the applicable requirements for Quality Assurance Records 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 SUMMARY OF DEFICIENCIES

6.1 Corrective Action Reports

During the audit, the audit team may identify conditions adverse to quality and document such conditions on CARs.

Condition Adverse to Quality (CAQ) – 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 QA program.

No HWFP-related CAQs were identified during Audit A-11-20.

6.2 Deficiencies Corrected During the Audit

During the audit, the audit team may identify CAQs. The audit team members and the audit team leader (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 therefore can be corrected during the audit (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 following definition:

CDA – 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 HWFP-related CDAs were identified during Audit A-11-11.

7.0 SUMMARY OF OBSERVATIONS AND RECOMMENDATIONS

During the audit, the audit team may identify potential problems or 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.

Recommendations – Suggestions that are 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.

7.1 Observations

No observations were provided to ANL/CCP management as a result of the audit.

7.2 Recommendations

The audit team offers the following recommendation to ANL/CCP, which addresses recent permit modifications.

Recommendation

It is recommended that freeze file changes as applicable be made to the AK Summary CCP-AK-ANLE-500 R6 for the RH waste stream AERHDM examined during this audit to address the permit modifications enacted on 12/30/10 dealing with Acceptable Knowledge. These changes are noted on the NMED WAP Compliance Matrix and will be attached to the AK Summary submitted with the final report to the State of New Mexico, consistent with the agreement made between NMED and CBFO. The changes were discussed with and concurred by the audit participants.

8.0 LIST OF ATTACHMENTS

- Attachment 1: Personnel Contacted During the Audit
- Attachment 2: Personnel Contacted During the Audit by Area
- Attachment 3: Objective Evidence
- Attachment 4: Listing of Audited Documents
- Attachment 5: List of Processes and Equipment Reviewed
- Attachment 6: Procedure Revision Matrix

PERSONNEL CONTACTED DURING AUDIT A-11-20

NAME	TITLE/ORG	PRE-AUDIT MEETING	CONTACTED DURING AUDIT	POST-AUDIT MEETING
Billett, M.	Training Coordinator/CCP		X	
Bond, E.	VEO/CCP		X	
Callahan, L.	Project Specialist/FMS/NOD		X	
Dietzel, D.	FPD/DOE ASO	X		X
Doherty, M.	AKE/CCP		X	
Fisher, A.J.	Sr. Tech. Adv. Training/CCP			X
Gomez, C.	QA Specialist/CCP	X	X	
Hodge, D.	205, K-Wing CAM/ANL	X		
Kirkes, C.	WCA/WCO/CCP		X	
Martin, R.	Record Analyst/CCP		X	
Nelson, L.	RH SPM/CCP	X	X	
Pancake, D.	Proj. Mgr./ANL	X	X	
Patee, S.	VEE/CCP		X	X
Pearcy, S.	Records Mgr./CCP	X	X	
Peters, K.	AKE/CCP		X	
Quintana, I.	PM/CCP	X	X	X
Ray, W.	Project Specialist/ANL		X	
Redman, G.	VEO/CCP		X	
Rock, C.	Nuc. Ops./ANL	X		
Root, W.	VPM/CCP	X	X	
Wade, L.	QA/CCP	X	X	
Watson, L.	AKE/CCP		X	

PERSONNEL CONTACTED DURING THE AUDIT BY AREA

Acceptable Knowledge	Doherty, M. Peters, K. Watson, L.
Nonconformances	Gomez, C.
Records	Pearcy, S.
Training	Billett, M. Martin, R.
Visual Examination	Bond, E. Callahan, L. Nelson, L. Pancake, D. Patee, S. Redman, G. Root, W. Wade, L.
Waste Certification/Project-level Data Validation & Verification	Quintana, I.
WIPP Waste Information System (WWIS Data Entry)	Kirkes, C.

Objective Evidence Reviewed During the Audit

The objective evidence supporting Audit A-11-20 is included in the box(es) submitted with this report. Included in the box(es) is a "Content Map" describing the location (using color coding) and identity of all required objective evidence supporting the performance of the audit.

LISTING OF AUDITED DOCUMENTS

No.	Procedure Number	Rev.	DOCUMENT TITLE
1.	CCP-AK-ANLE-500	6	ANL Summary Report for AERHDM
2.	CCP-AK-ANLE-501	5	RH TRU Rad Char Tech Report for AERHDM
3.	CCP-AK-ANLE-502	3	Certification Plan for AERHDM
4.	CCP-AK-ANL-505C	0	Fuel Examination Waste Confirmation Test for AERHDM
5.	CCP-PO-001	20	CCP TRU Waste Characterization QAPJP
6.	CCP-PO-002	25	CCP Transuranic Waste Certification Plan
7.	CCP-PO-005	22	CCP Conduct of Operations
8.	CCP-PO-006	3	CCP Conduct of Operations Matrix
9.	CCP-PO-008	9	CCP Quality Assurance Interface With WTS QA Program
10.	CCP-PO-500	1	CCP/ANL RH TRU Waste Interface Document
11.	CCP-PO-505	0	CCP Remote-Handled Transuranic Waste Authorized Methods For Payload Control
12.	CCP-QP-001	6	CCP Graded Approach
13.	CCP-QP-002	31	CCP Training and Qualification Plan
14.	CCP-QP-004	10	CCP Corrective Action Management
15.	CCP-QP-005	20	CCP TRU Nonconforming Item Reporting and Control
16.	CCP-QP-006	9	CCP Corrective Action Reporting and Control
17.	CCP-QP-008	18	CCP Records Management
18.	CCP-QP-010	22	CCP Document Preparation, Approval, and Control
19.	CCP-QP-014	4	CCP Trend Analysis and Reporting
20.	CCP-QP-015	11	CCP Procurement
21.	CCP-QP-016	15	CCP Control of Measuring and Testing Equipment
22.	CCP-QP-017	3	CCP Identification and Control of Items
23.	CCP-QP-018	8	CCP Management Assessment
24.	CCP-QP-019	6	CCP Quality Assurance Reporting to Management
25.	CCP-QP-021	7	CCP Surveillance Program
26.	CCP-QP-022	12	CCP Software Quality Assurance Plan
27.	CCP-QP-023	3	CCP Handling, Storage and Shipping
28.	CCP-QP-026	11	CCP Inspection Control

LISTING OF AUDITED DOCUMENTS

No.	Procedure Number	Rev.	DOCUMENT TITLE
29.	CCP-QP-027	5	CCP Test Control
30.	CCP-QP-028	12	CCP Records Filing, Inventorying, Scheduling, and Dispositioning
31.	CCP-QP-030	8	CCP Written Practice for the Qualification of CCP Helium Leak Detection Personnel
32.	CCP-TP-001	19	CCP Project Level Data Validation and Verification
33.	CCP-TP-002	23	CCP Reconciliation of DQOs and Reporting Characterization Data
34.	CCP-TP-003	18	CCP Data Analysis for S3000, S4000, and S5000 Characterization
35.	CCP-TP-005	22	CCP Acceptable Knowledge Documentation
36.	CCP-TP-055	4	CCP Varian Porta-Test Leak Detector Operations
37.	CCP-TP-082	8	CCP Preparing and Handling Waste Containers for HSGS
38.	CCP-TP-093	15	CCP Sampling of TRU Waste Containers
39.	CCP-TP-106	7	CCP HSGS BDR Preparation
40.	CCP-TP-162	1	CCP Random Selection of Containers for Solids and HSGS and Analysis
41.	CCP-TP-163	2	CCP Evaluation of Waste Packaging Records for VE of Records
42.	CCP-TP-500	11	CCP RH Waste VE
43.	CCP-TP-505	6	CCP Removable Lid Canister Loading
44.	CCP-TP-506	2	CCP Preparation of the RH TRU Waste AK Characterization Reconciliation Report
45.	CCP-TP-509	3	CCP RH TRU Container Tracking
46.	CCP-TP-512	5	CCP RH Waste Sampling
47.	CCP-TP-530	10	CCP RH TRU Waste Certification and WWIS/WDS Data Entry
48.	WP 13-QA.03	18	Q A Independent Assessment Program

PROCESSES AND EQUIPMENT EVALUATED DURING CBFO AUDIT A-11-20

WIPP #	Process/Equipment Description	Applicable to the Following Waste Streams/Groups of Waste Streams	Currently Approved by NMED	Currently Approved by EPA
PREVIOUSLY APPROVED PROCESSES OR EQUIPMENT				
The following were evaluated during CBFO Audit A-11-20				
8RHVE1	Visual Examination CCP-TP-500, Remote-Handled Waste Visual Examination CCP-TP-163, CCP Standard Visual Examination of Records	Debris (S5000)	YES	YES (Records only)
8RHVE2	Visual Examination of Newly Packaged RH Waste Drums CCP-TP-500, Remote-Handled Waste Visual Examination	Debris (S5000)	YES	YES
Not Applicable	Acceptable Knowledge CCP-TP-005, CCP Acceptable Knowledge Documentation	Debris (S5000)	YES	YES
Not Applicable	Headspace Gas Sampling CCP-TP-093, CCP Sampling of TRU Waste Containers	Debris (S5000)	YES	N/A
Not Applicable	Data Verification and Validation CCP-TP-001, CCP Project Level Data Validation and Verification CCP-TP-500, Remote-Handled Waste Visual Examination CCP-TP-504, CCP Dose-to-Curie Survey Procedure	Debris (S5000)	YES	YES
Not Applicable	Quality Assurance	N/A	N/A	YES
Not Applicable	WIPP Waste Information System (WWIS)/Waste Data System (WDS)	N/A	YES	YES

PROCEDURE REVISION MATRIX

No	Procedure Number	Procedure Title	Revision During Last Annual Audit	Revision During Current Annual Audit	Brief Description of Procedure Changes
1	CCP-AK-ANLE-500	ANL Summary Report for AERHDM	5	6	Revised to add TRUCON Code AE 322.
2	CCP-AK-ANLE-501	RH TRU Rad Char Tech Report for AERHDM	2	5	R3-Revised to add Appendix C that addresses Fuel Examination Waste processed in the Alpha Gamma Hot Cell Facility. R4-Revised to add Appendix D that addresses solidified liquid debris waste from the K-Wing Hot Cells. R5-Revised to add Appendix B addressing Fuel Examination Waste K-Wing and Appendix E to address RERTR fuel plates.
3	CCP-AK-ANLE-502	Confirmation Test Plan for AERHDM	1	3	R2-Revised to include debris waste from the 205 K-Wing and fuel examination waste from the Alpha Gamma Hot Cell. R3-Revised to include length and weight measurements and liquid sampling to the radiological characterization strategy.
4	CCP-AK-ANL-505C	Fuel Examination Waste Confirmation Test for AERHDM	0	0	
5	CCP-PO-001	CCP TRU Waste Characterization QAPJP	17	20	R18-Revised to incorporate modifications to the Hazardous Waste Facility Permit. To make editorial changes that are needed and to change the WIPP WWIS to WWIS/WDS. R19-Revised to include changes from Permit Renewal. R20-Revised to incorporate Class 2 Permit Modification (Transporter Model III and Standard Large Box 2).
6	CCP-PO-002	CCP Transuranic Waste Certification Plan	24	25	Revised to incorporate Revision 7.0 of DOE/WIPP-02-312 and minor editorial changes.
7	CCP-PO-005	CCP Conduct Of Operations	21	22	Revised to add detail to Section 6.0 and Section 7.0, and make minor editorial corrections throughout.
8	CCP-PO-006	CCP Conduct Of Operations Matrix	3	3	
9	CCP-PO-008	CCP Quality Assurance Interface With WTS QA Program	8	9	Minor revision to update references to the <i>Waste Isolation Pilot Plant Hazardous Waste Facility Permit</i> .
10	CCP-PO-500	CCP/ANL RH TRU Waste Interface Document	1	1	
11	CCP-PO-505	CCP Remote Handled Transuranic Authorized Methods For Payload	0	0	

PROCEDURE REVISION MATRIX

No	Procedure Number	Procedure Title	Revision During Last Annual Audit	Revision During Current Annual Audit	Brief Description of Procedure Changes
12	CCP-QP-001	CCP Graded Approach	5	6	Revised to change steps to access database to the new Bellview page and clarify steps in the process; delete Section C of Attachment 1; delete Attachment 3; and, incorporate CBFO comments.
13	CCP-QP-002	CCP Training And Qualification Plan	28	31	R29- Revised to incorporate changes into Attachment 4, CCP Test Drum Data Sheet for Contact-Handled Waste, and other minor editorial changes. R30- Revised to bring into compliance with the revision of the <i>Waste Isolation Pilot Plant Hazardous Waste Facility Permit</i> . R31- Revised based on Rev 2 of the DOE/WIPP 02-3214.
14	CCP-QP-004	CCP Corrective Action Management	9	10	Revised to implement the revision of the Permit.
15	CCP-QP-005	CCP TRU Nonconforming Item Reporting And Control	18	20	R19- Revised to: clarify hold tag application; CBFO notification requirements including responsibility, incorporate CCP-SO-054, 1 and CCP-SO-065, 0; revisions to Attachment 1, CCP Nonconformance Report (NCR); and other minor editorial changes. R20- Revised to incorporate relevant steps from CCP-QP-004, <i>CCP Corrective Action Management</i> , and other editorial changes.
16	CCP-QP-006	CCP Corrective Action Reporting And Control	9	9	
17	CCP-QP-008	CCP Records Management	15	18	R16- Revised to clarify and address the submittal of historical source documents R17- Revised to change the submittal process for Accepted Knowledge (AK) documentation and section on historical source documents. R18- Revised to support corrective action report (CAR)-LANL-0004-10.
18	CCP-QP-010	CCP Document Preparation, Approval, And Control	20	22	R21- Revised to update references to the Permit. R22- Revised to update figure/table formatting and referencing, records requirements, and other editorial changes.
19	CCP-QP-014	CCP Trend Analysis And Reporting	3	4	Revised to improve flow and more closely align with upper tier drivers.

PROCEDURE REVISION MATRIX

No	Procedure Number	Procedure Title	Revision During Last Annual Audit	Revision During Current Annual Audit	Brief Description of Procedure Changes
20	CCP-QP-015	CCP Procurement	10	11	Revised to move Subcontract Technical Representative (STR) from the note to Section 3 and other clarifications and other editorial changes.
21	CCP-QP-016	CCP Control Of Measuring And Testing Equipment	15	15	
22	CCP-QP-017	CCP Identification And Control Of Items	3	3	
23	CCP-QP-018	CCP Management Assessment	8	8	
24	CCP-QP-019	CCP Quality Assurance Reporting To Management	5	6	Revised to clarify administrative protocols on the distribution of the Semiannual Quality Assurance (QA) Report.
25	CCP-QP-021	CCP Surveillance Program	7	7	
26	CCP-QP-022	CCP Software Quality Assurance Plan	11	12	Revised to add steps for the SCMC to issue SCO numbers through the data center. This is in reference to the CAR-CCP-0010-10.
27	CCP-QP-023	CCP Handling, Storage And Shipping	3	3	
28	CCP-QP-026	CCP Inspection Control	9	11	R10- Revised Attachment 2, CCP Random Sampling Plan for Receipt Inspection, deleted reference to ANSI/ASQC Z 1.4, and made changes to better describe sequence activities. R11- Revised to incorporate procedure changes and minor editorial comments.
29	CCP-QP-027	CCP Test Control	4	5	Revised to clarify how CCP-QP-010 is applicable only to the control, not the development, of a test plan.
30	CCP-QP-028	CCP Records Filing, Inventory, Scheduling, And Dispositioning	11	12	Revised to remove examples form and re-number remaining attachments and update Attachment 2.
31	CCP-QP-030	CCP Written Practice For The Qualification Of CCP Helium Leak Detection Personnel	8	8	
32	CCP-TP-001	CCP Project Level Data Validation And Verification	17	19	R18- Revised to address Hazardous Waste Facility Permit modification, and other editorial and freeze file changes. R19- Revised to clarify independent technical reviewer (ITR) Independence and to update references to the Permit.
33	CCP-TP-002	CCP Reconciliation Of DQOs And Reporting Characterization Data	22	23	Revised to implement the revision of the Permit.
34	CCP-TP-003	CCP Data Analysis For S3000, S4000, And S5000 Characterization	17	18	Revised to implement the revision of the Permit.
35	CCP-TP-005	CCP Acceptable Knowledge Documentation	18	22	R19- Revised document to address the WIPP Form WF09-

PROCEDURE REVISION MATRIX

No	Procedure Number	Procedure Title	Revision During Last Annual Audit	Revision During Current Annual Audit	Brief Description of Procedure Changes
					171 from an internal CCP audit and to incorporate minor editorial changes and technical clarifications noted as a result of various Acceptable Knowledge audits. R20- Revised to allow new and updated attachments and source documents to be submitted anytime after the initial submittal. R21- Revised to implement the revision of the Permit. R22- Revised to address changes in Revision 2 of the WCPIP. Incorporated editorial changes and technical clarifications throughout procedure.
36	CCP-TP-055	CCP Varian Porta-Test Leak Detector Operations	4	4	
37	CCP-TP-082	CCP Preparing and Handling Waste Containers for HSGS	7	8	Removed elements no longer required or redundant to host site procedures.
38	CCP-TP-093	CCP Sampling of TRU Waste Containers	13	15	R14- Revised to eliminate the allowance of the procedure to perform Transportation Headspace sampling. Revised the note under step 4.5.6 per CCP-PO-001. Made editorial changes. Clarified the Field Reference Standard process. Eliminated the allowance of compositing samples. Updated the Chain-of-Custody form. Changed the batch data report (BDR) numbering format. Incorporated recommendations from Audit A-10-04. Updated references to the Permit. R15- Revised to update the procedure so the field blank criteria matches the permit, eliminated the VPM from the responsibilities section and clarified the use of Chain-of-Custody.
39	CCP-TP-106	CCP HSGS BDR Preparation	6	7	Revised to clarify ITR independence.
40	CCP-TP-162	CCP Random Selection of Containers for Solids and HSGS and Analysis	0	1	Minor revision to update references to the Permit.
41	CCP-TP-163	CCP Evaluation of Waste Packaging Records for VE of Records	2	2	

PROCEDURE REVISION MATRIX

No	Procedure Number	Procedure Title	Revision During Last Annual Audit	Revision During Current Annual Audit	Brief Description of Procedure Changes
42	CCP-TP-500	CCP RH Waste VE	8	11	R9- Revised to make changes for a two shift operation and two different sets of qualified operators to be able to work on the same RH-VE. Added Table 1, Prohibited Items List, and updated language to reflect the permit modification. R10- Revised to incorporate Permit Modification ITR. language. R11- Implement Revision 2 of DOE/WIPP-02-3214.
43	CCP-TP-505	CCP Removable Lid Canister Loading	5	6	Revised to incorporate Gasket Shelf Life criteria and editorial changes.
44	CCP-TP-506	CCP Preparation of the RH TRU Waste AK Characterization Reconciliation Report	2	2	
45	CCP-TP-509	CCP RH TRU Container Tracking	2	3	Revised to include the NDA process.
46	CCP-TP-512	CCP RH Waste Sampling	3	5	R4- Revised to incorporate Permit Mod ITR language. R5- Revised to implement revision 2 of DOE/WIPP-02-3214.
47	CCP-TP-530	CCP RH TRU Waste Certification and WWIS/WDS Data Entry	9	10	Revised Table 1, Data Sources for the RH WDS Master Template, to include a new source for Gross Weight and a new field label and source for RH NDA.
48	WP 13-QA.03	Q A Independent Assessment Program	17	18	Added allowance for the QA Programs manager to extend the time limit for issuance of an audit report.

Appendix D
Redlined A-11-20 C6-1 Checklist

**Table C6-1 Waste Analysis Plan (WAP) Checklist
ANL/CCP Certification Audit, A-11-20, August 2-4, 2011**

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Waste Analysis Plan (WAP) General Checklist for use at DOE's Generator/Storage Sites

	WAP Requirement ¹ ANL/CCP Certification Audit, A-11-20, August 2-4, 2011 Table C6-1 Waste Analysis Plan (WAP) Checklist ¹	Procedure Documented		Example of Implementation/Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
WASTE STREAM IDENTIFICATION						
1	Does the generator/storage site define a waste stream as waste material generated from a single process or from an activity that is similar in material, physical form, and hazardous constituents? (Attachment C Section C-0a)	CCP-PO-001, S. C-0a CCP-TP-005, S. 4.4.11 NOTE above	Y	CCP AK Summary Report for ANL RH Debris Waste, waste stream AERHDM, CCP-AK-ANLE-500 R6 (AK-1)	Y	
2	Are procedures in place to ensure that the generator/storage site assigns one of the Summary Category Groups (S3000-homogeneous solids, S4000-soils/gravel, S5000-debris waste) to each waste stream? (Section C-1b)	CCP-TP-005, S. 4.4.14 S. 4.4.15 CCP-TP-002, S. 4.3 Att. 2	Y	CCP AK Summary Report for ANL RH Debris Waste, waste stream AERHDM, CCP-AK-ANLE-500 R6, S2.0 (AK-1) Waste Stream Profile Form and attachments for waste stream AERHDM (AK-2)	Y	
3	Are procedures in place to ensure that the generator/storage site assigns Waste Matrix Code Groups (e.g., solidified inorganics, solidified organics, salt waste, soils, combustible waste, filters, graphite, heterogeneous debris waste, inorganic nonmetal waste, lead/cadmium metal, uncategorized metal) to each waste stream? (Section C-0a)	CCP-TP-005, S. 4.4.13 NOTE above CCP-TP-002, S. 4.3 Att. 2	Y	CCP AK Summary Report for ANL RH Debris Waste, waste stream AERHDM, CCP-AK-ANLE-500 R6, S2.0 (AK-1) Waste Stream Profile Form and attachments for waste stream AERHDM (AK-2)	Y	
4	Are procedures in place to ensure that the generator/storage site assigns a Waste Stream WIPP Identifier (ID) to each waste stream? (Section C3-12b(1))	CCP-TP-002, S. 4.3 Att. 2	Y	Waste Stream Profile Form and attachments for waste stream AERHDM (AK-2)	Y	

	WAP Requirement ¹ ANL/CCP Certification Audit, A-11-20, August 2-4, 2011 Table C6-1 Waste Analysis Plan (WAP) Checklist ¹	Procedure Documented		Example of Implementation/Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
4a	<p>Are procedures in place for generator/storage sites to submit an AK Sufficiency Determination (Determination Request) to the Permittees to meet all or part of the waste characterization requirements including:</p> <ul style="list-style-type: none"> All information specified in Permit Attachment C4, Section C4-3d Identification of relevant hazardous constituents, and correctly identifies all toxicity characteristic and listed hazardous waste numbers All hazardous waste number assignments must be substantiated by supporting data and, if not, whether this lack of substantiation compromises the interpretation Resolution of data discrepancies between different AK sources must be technically correct and documented The AK Summary includes all the identification of waste material parameter weights by percentage of the material in the waste stream, and determinations are technically correct All prohibited items specified in the TSDf-WAC should be addressed, and conclusions drawn are technically adequate and substantiated by supporting information If the AK record includes process control information specified in Permit Attachment C4, Section C4-3b, the information should include procedures, waste manifests, or other documentation demonstrating that the controls were adequate and sufficient. The site must provide the supporting information necessary to substantiate technical conclusions within the Determination Request, and this information must be correctly interpreted. <p>(Section C-0b, Section C4-3d)</p>	CCP-TP-005, S. 4.7	Y	N/A	N/A	An AK Sufficiency Determination is not being sought for any ANL waste streams examined during this audit
4b	<p>If a generator/storage site does not submit a Determination Request or if the Determination Request is not approved, are procedures in place for the generator/storage site to perform radiography or VE on 100% of the containers in a waste stream and chemical sampling and analysis on a representative sample of the waste stream using headspace gas sampling and analysis (for debris waste) or solids sampling and analysis (for homogeneous solid or soil/gravel waste) as specified in Permit Attachments C1 and C2?</p> <p>(Section C-0b)</p>	CCP-PO-001, S. C-0b CCP-TP-001, S. 3.1 CCP-TP-002, (All) CCP-TP-500, (All)	Y	RHANLVE110002 RHANLVE110007 ANLRHVE11008 (GEN-1) ANHSGS100003 ECL10033G ECL10033M (GEN-2)	Y	<p>Radiography and solids sampling and analysis are not in the scope of this audit.</p> <p>An AK Sufficiency Determination is not being sought for any ANL waste streams examined during this audit</p>

	WAP Requirement ¹ ANL/CCP Certification Audit, A-11-20, August 2-4, 2011 Table C6-1 Waste Analysis Plan (WAP) Checklist ¹	Procedure Documented		Example of Implementation/Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
4c	Are procedures in place to ensure that the generator/storage sites complete a Waste Stream Profile Form (WSPF) and Characterization Information Summary (CIS) as specified in Permit Attachment C3, Sections C3-12b(1) and C3-12b(2)? (Section C-0c)	CCP-TP-002, S. 1.1	Y	CP:08:00374 – Transmittal of Waste Stream Profile Form, Attachment 2, for Remote Handled Waste Stream AERHDM at the Argonne National Laboratory with Characterization Information Summary CP:08:00375 - Transmittal of Waste Stream Profile Form, Attachment 4, for Remote Handled Waste Stream AERHDM at the Argonne National Laboratory (GEN-3)	Y	
5	Are procedures in place to ensure that the generator/storage site divides waste streams into waste stream lots if all of the waste within a waste stream is not accessible for sampling and analysis, as required, at one time? If so, is the division of waste streams into waste stream lots based on staging, transportation and handling issues? (Section C-1a)	CCP-PO-001, S. C-1a CCP-TP-002, (All)	Y	CP:08:00374 – Transmittal of Waste Stream Profile Form, Attachment 2, for Remote Handled Waste Stream AERHDM at the Argonne National Laboratory with Characterization Information Summary CP:08:00375 - Transmittal of Waste Stream Profile Form, Attachment 4, for Remote Handled Waste Stream AERHDM at the Argonne National Laboratory (GEN-3)	Y	
6	Are procedures in place to ensure that the generator/storage site assigns EPA hazardous waste numbers associated with the waste? If so, do these assigned EPA hazardous waste numbers correspond to the permitted EPA hazardous waste numbers in Table C-9? Are there any assigned EPA hazardous waste numbers that are not permitted EPA hazardous waste numbers on the Table C-9? If so, did the generator/storage site reject the waste for shipment to and disposal at WIPP? Did the generator assign a state hazardous waste codes or numbers? If so, is it assigned to waste that is permitted at WIPP? (Section C-1b)	CCP-TP-005, S. 4.4.16- 4.4.21 Att. 5	Y	CCP AK Summary Report for ANL RH Debris Waste, waste stream AERHDM, CCP-AK-ANLE-500 R6, S5.4.2, tables 4, 5 (AK-1) AK Att. 5, Hazardous Constituents, for waste stream AERHDM (AK-7)	Y	

	WAP Requirement ¹ ANL/CCP Certification Audit, A-11-20, August 2-4, 2011 Table C6-1 Waste Analysis Plan (WAP) Checklist ¹	Procedure Documented		Example of Implementation/Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
Z	<p>Are procedures in place to ensure that Summary Category Groups are defined as follows:</p> <p>S3000- Homogeneous solids are solid material, inorganic process residues, inorganic sludges, salt waste, and pyrochemical salt waste excluding soils, that do not meet NMED criteria for classification as debris and are at least 50 percent by volume homogeneous solids or comprise the majority of the waste stream</p> <p>S4000- Waste streams that are at least 50 percent by volume soil/gravel, or comprise the majority of the waste stream</p> <p>S5000- Waste streams that are at least 50 percent volume materials that meet the NMED criteria for debris, or comprise the majority matrix of materials. The criteria for debris are solid materials intended for disposal that exceed 2.36 inch particle size and is a manufactured object, plant or animal matter, or natural geologic material. Particles smaller than 2.36 inches in size may be considered debris if the debris is a manufactured object and if it is not a particle of S3000 or S4000 material.</p> <p>(Section C-0a)</p>	CCP-TP-005, S. 4.4.14	Y	CCP AK Summary Report for ANL RH Debris Waste, waste stream AERHDM, CCP-AK-ANLE-500 R6, S2.0 (AK-1) Waste Stream Profile Form and attachments for waste stream AERHDM (AK-2)	Y	

	WAP Requirement ¹ ANL/CCP Certification Audit, A-11-20, August 2-4, 2011 Table C6-1 Waste Analysis Plan (WAP) Checklist ¹	Procedure Documented		Example of Implementation/Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
8	<p>Does the generator/storage facility have procedures in place to ensure that the following waste characterization parameters will be obtained:</p> <ul style="list-style-type: none"> Determination whether TRU mixed waste streams comply with the applicable provisions of the TSDF-WAC Determination whether TRU mixed wastes exhibit a hazardous characteristic per 20.4.1.200 NMAC (incorporating 40 CFR 261 Subpart C) Determination whether TRU mixed wastes are listed per 20.4.1.200 NMAC (incorporating 40 CFR 261 Subpart D) <p>Estimation of waste material parameter weights (Section C-2)</p>	<p>AK CCP-TP-005, S. 4.4.16 S. 4.4.17 S. 4.4.27 S. 4.4.31 S. 4.4.34[K], [L] & [M] CCP-TP-500, S. 4.4</p>	<p>Y</p>	<p>B1. CCP AK Summary Report for ANL RH Debris Waste, waste stream AERHDM, CCP-AK-ANLE-500 R6, S5.4.2.3, 5.4.4, 5.4.5 (AK-1) AK Att. 6, Waste Form, Waste Material Parameters, Prohibited Items and Packaging for waste stream AERHDM (AK-8) ANLRHVE11009 (AK-13) RHANLVE100013 (AK-14) RHANLVE100005 (AK-15) RHANLVE090002 (AK-16) RHANLVE060002 (AK-17)</p> <p>B2&3. CCP AK Summary Report for ANL RH Debris Waste, waste stream AERHDM, CCP-AK-ANLE-500 R6, S5.4.2, tables 4, 5 (AK-1) AK Att. 5, Hazardous Constituents, for waste stream AERHDM (AK-7)</p> <p>B4. CCP AK Summary Report for ANL RH Debris Waste, waste stream AERHDM, CCP-AK-ANLE-500 R6, S5.4.1.2, table 3</p>	<p>Y</p>	

	WAP Requirement ¹ ANL/CCP Certification Audit, A-11-20, August 2-4, 2011 Table C6-1 Waste Analysis Plan (WAP) Checklist ¹	Procedure Documented		Example of Implementation/Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
		PL CCP-TP-001, S. 4.2 CCP-TP-002, S. 4.0	Y	(AK-1) Memo attached to AK Att. 6, Waste Form, Waste Material Parameters, Prohibited Items and Packaging for waste stream AERHDM (AK-8) RHANLVE110002 RHANLVE110007 ANLRHVE11008 (GEN-1) ANHSGS100003 ECL10033G ECL10033M (GEN-2) CP:08:00374 – Transmittal of Waste Stream Profile Form, Attachment 2, for Remote Handled Waste Stream AERHDM at the Argonne National Laboratory with Characterization Information Summary CP:08:00375 - Transmittal of Waste Stream Profile Form, Attachment 4, for Remote Handled Waste Stream AERHDM at the Argonne National Laboratory (GEN-3)	Y	
9	Are procedures in place to ensure that waste streams identified to contain incompatible materials or materials incompatible with waste containers cannot be shipped unless treated to remove the incompatibility? (Section C-1c)	CCP-TP-005, S. 4.4.31 S. 4.4.34[K] CCP-TP-001, S. 2.7 S. 4.2 CCP-TP-500, S. 4.4	Y	CCP AK Summary Report for ANL RH Debris Waste, waste stream AERHDM, CCP-AK-ANLE-500 R6, S5.4.5 (AK-1) AK Att. 6, Waste Form, Waste Material Parameters, Prohibited Items and Packaging for waste stream AERHDM		

	WAP Requirement ¹ ANL/CCP Certification Audit, A-11-20, August 2-4, 2011 Table C6-1 Waste Analysis Plan (WAP) Checklist ¹	Procedure Documented		Example of Implementation/Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
		S. C-3 CCP-TP-005, S. 4.4 S. 4.5 CCP-TP-001, S. 4.2 CCP-TP-002, S. 4.2 CCP-TP-500, S. 4.3		RHANLVE110007 ANLRHVE11008 (GEN-1) ANHSGS100003 ECL10033G ECL10033M (GEN-2) CP:08:00374 – Transmittal of Waste Stream Profile Form, Attachment 2, for Remote Handled Waste Stream AERHDM at the Argonne National Laboratory with Characterization Information Summary CP:08:00375 - Transmittal of Waste Stream Profile Form, Attachment 4, for Remote Handled Waste Stream AERHDM at the Argonne National Laboratory (GEN-3)		and analysis are not in the scope of this audit.
UNACCEPTABLE WASTE						
12	<p>Are procedures in place to ensure that the generator/storage site ensures, through administrative and operational procedures and characterization techniques, that waste containers do not include the following unacceptable waste:</p> <ul style="list-style-type: none"> liquid waste is not acceptable at WIPP. Liquid in the quantities delineated below is acceptable <ul style="list-style-type: none"> Observable liquid shall be no more than 1 percent by volume of the outermost container at the time of radiography or visual examination Internal containers with more than 60 milliliters or 3 percent by volume observable liquid, whichever is greater, are prohibited Containers with Hazardous Waste number U134 assigned shall have no observable liquid Overpacking the outermost container that was examined during radiography or visual examination or redistributing untreated liquid within the container shall not be used to meet the liquid volume limits non-radionuclide pyrophoric materials 	CCP-TP-001, S. 4.2 CCP-TP-002, Att. 1 Att. 2	Y	RHANLVE110002 RHANLVE110007 ANLRHVE11008 (GEN-1) ANHSGS100003 ECL10033G ECL10033M (GEN-2) CP:08:00374 – Transmittal of Waste Stream Profile Form, Attachment 2, for Remote Handled Waste Stream AERHDM at the Argonne National Laboratory with Characterization Information Summary CP:08:00375 - Transmittal of Waste Stream Profile Form,	Y	

	WAP Requirement ¹ ANL/CCP Certification Audit, A-11-20, August 2-4, 2011 Table C6-1 Waste Analysis Plan (WAP) Checklist ¹	Procedure Documented		Example of Implementation/Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
	<ul style="list-style-type: none"> hazardous wastes not occurring as co-contaminants with TRU wastes (non-mixed hazardous wastes) wastes incompatible with backfill, seal and panel closures materials, container and packaging materials, shipping container materials, or other wastes wastes containing explosives or compressed gases (continued below) 			Attachment 4, for Remote Handled Waste Stream AERHDM at the Argonne National Laboratory (GEN-3)		
12a	<ul style="list-style-type: none"> wastes with polychlorinated biphenyls (PCBs) not authorized under an EPA PCB waste disposal authorization wastes exhibiting the characteristic of ignitability, corrosivity, or reactivity (EPA Hazardous Waste Numbers of D001, D002, or D003) waste that has ever been managed as high-level waste and waste from tanks specified in Table C-8, unless specifically approved through a Class 3 permit modification any waste container from a waste stream (or waste stream lot) which has not undergone either radiographic or visual examination of a statistically representative subpopulation of the wastes stream in each shipment pursuant to Permit Attachment C7 <p>any waste container from a waste stream which has not been preceded by an appropriate, certified Waste Stream Profile Form (see Section C-1d) (Section C-1c)</p>	CCP-TP-001, S. 4.2 CCP-TP-002, Att. 1 Att. 2	Y	RHANLVE110002 RHANLVE110007 ANLRHVE11008 (GEN-1) ANHSGS100003 ECL10033G ECL10033M (GEN-2) CP:08:00374 – Transmittal of Waste Stream Profile Form, Attachment 2, for Remote Handled Waste Stream AERHDM at the Argonne National Laboratory with Characterization Information Summary CP:08:00375 - Transmittal of Waste Stream Profile Form, Attachment 4, for Remote Handled Waste Stream AERHDM at the Argonne National Laboratory (GEN-3)	Y	
WASTE ACCEPTANCE CONTROL						
14	Are procedures in place to ensure that the generator/storage site uses a Waste Stream Profile Form (WSPF) which includes, at a minimum, the information indicated on the attached WSPF found in Figure C-1 and a Characterization Information Summary (CIS) prior to waste disposal at the WIPP? (Section C-1d)	CCP-TP-002, (All)	Y	CP:08:00374 – Transmittal of Waste Stream Profile Form, Attachment 2, for Remote Handled Waste Stream AERHDM at the Argonne National Laboratory with Characterization information Summary CP:08:00375 - Transmittal of Waste	Y	

	WAP Requirement ¹ ANL/CCP Certification Audit, A-11-20, August 2-4, 2011 Table C6-1 Waste Analysis Plan (WAP) Checklist ¹	Procedure Documented		Example of Implementation/Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
				Stream Profile Form, Attachment 4, for Remote led Waste Stream AERHDM at the Argonne National Laboratory (GEN-3)		
16	Are procedures in place to ensure that additional WSPFs are provided to WIPP and NMED for waste streams or portions of waste streams that are reclassified based upon waste characterization information? (Section C-1d)	CCP-TP-002, (All)	Y	CP:08:00374 – Transmittal of Waste Stream Profile Form, Attachment 2, for Remote Handled Waste Stream AERHDM at the Argonne National Laboratory with Characterization Information Summary CP:08:00375 - Transmittal of Waste Stream Profile Form, Attachment 4, for Remote Handled Waste Stream AERHDM at the Argonne National Laboratory (GEN-3)	Y	There were no waste stream reclassifications based upon waste characterization information since the last audit.
16a	Are criteria in place to determine the specific circumstances under which a WSPF is revised versus when a new WSPF is required? (Section C-1d)	PL CCP-TP-002, (All) AK CCP-TP-002, S 4.7	Y Y	CP:08:00374 – Transmittal of Waste Stream Profile Form, Attachment 2, for Remote Handled Waste Stream AERHDM at the Argonne National Laboratory with Characterization Information Summary CP:08:00375 - Transmittal of Waste Stream Profile Form, Attachment 4, for Remote Handled Waste Stream AERHDM at the Argonne National Laboratory (GEN-3) N/A	Y N/A	There were no waste stream reclassifications based upon waste characterization information since the last audit. A revision to the waste stream profile form was not required for this waste stream

	WAP Requirement ¹ ANL/CCP Certification Audit, A-11-20, August 2-4, 2011 Table C6-1 Waste Analysis Plan (WAP) Checklist ¹	Procedure Documented		Example of Implementation/Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
LABORATORY QUALIFICATION						
17	Are procedures in place to ensure that the generator/storage site conduct analyses using laboratories that are qualified through participation in the Performance Demonstration Program (PDP) for headspace gas sampling and analysis, and PDP homogeneous waste sampling and analysis? (Section C-3a(3))	NA	NA	NA	NA	The laboratory is qualified under a separate audit.
18	Are procedures in place to ensure that the generator/storage sites conduct analyses using laboratories that implement the analytical methods through laboratory-documented standard operating procedures (SOPs) that ensure that analytical QA/QCs are met? (Section C-3a(3))	NA	NA	NA	NA	The laboratory is qualified under a separate audit.
19	Are procedures in place to ensure that documented laboratory QA/QC programs include the following: <ul style="list-style-type: none"> • Facility organization • List of equipment/instrumentation • Operating procedures • Laboratory QA/QC procedures • Quality assurance review • Laboratory records management (Section C-4a(4))	NA	NA	NA	NA	The laboratory is qualified under a separate audit.
GENERAL SAMPLING AND ANALYTICAL REQUIREMENTS						
20	Are procedures in place to ensure that headspace gas sampling and analysis shall be used to: <ul style="list-style-type: none"> • Determine the types and concentrations of VOCs in the void volume of waste containers VOC constituents shall be compared to those assigned by Acceptable Knowledge (Section C-3a(1))	CCP-TP-005, S. 4.5.3	Y	ANHSGS100003 ECL10033G ECL10033M (GEN-2) CP:08:00374 – Transmittal of Waste Stream Profile Form, Attachment 2, for Remote Handled Waste Stream AERHDM at the Argonne National Laboratory with Characterization Information Summary CP:08:00375 - Transmittal of Waste Stream Profile Form, Attachment 4, for Remote	Y	

	WAP Requirement ¹ ANL/CCP Certification Audit, A-11-20, August 2-4, 2011 Table C6-1 Waste Analysis Plan (WAP) Checklist ¹	Procedure Documented		Example of Implementation/Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
				Handled Waste Stream AERHDM at the Argonne National Laboratory (GEN-3)		
22	Are procedures in place to ensure that compounds not on the list of target analytes are reported as tentatively identified compounds (TICs) and that the TIC will be added to the target analyte list if it appears in the 20.4.1.200 NMAC (incorporating 40 CFR 261) Appendix VIII list and if they are reported in 25% of the waste containers sampled from a given waste stream? (Section C-3a(1))	CCP-TP-003, S. 4.3	Y	ANHSGS100003 ECL10033G ECL10033M (GEN-2) CP:08:00374 – Transmittal of Waste Stream Profile Form, Attachment 2, for Remote Handled Waste Stream AERHDM at the Argonne National Laboratory with Characterization Information Summary CP:08:00375 - Transmittal of Waste Stream Profile Form, Attachment 4, for Remote Handled Waste Stream AERHDM at the Argonne National Laboratory (GEN-3)	Y	Headspace Gas: NA – This is evaluated at the Project Level and the laboratory is qualified under a separate audit.

	WAP Requirement ¹ ANL/CCP Certification Audit, A-11-20, August 2-4, 2011 Table C6-1 Waste Analysis Plan (WAP) Checklist ¹	Procedure Documented		Example of Implementation/Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
23	<p>Are procedures in place to ensure that a randomly selected set of samples will be collected through core sampling or other EPA approved sampling from the population of waste containers for homogeneous and soil/gravel waste streams?</p> <p>Are procedures in place that a sufficient number of samples are collected to evaluate the toxicity characteristic of a waste stream at a 90 percent Upper Confidence limit as specified in Attachment C2?</p> <p>(Section C-3a(2))</p>	CCP-TP-162, (All)	Y	CP:06:01623 – Headspace Gas Random Sample Selection Memorandum for Waste Stream AERHDM Lot 1, Being Characterized by the Central Characterization Project at the Argonne National Laboratory CP:07:01119 – Headspace Gas Random Sample Selection Memorandum for Waste Stream AERHDM Lot 2, Being Characterized by the Central Characterization Project at the Argonne National Laboratory CP:08:00407 – Revised Headspace Gas Random Sample Selection Memorandum for Waste Stream AERHDM Lot 2, Being Characterized by the Central Characterization Project at the Argonne National Laboratory CP:08:00412 - Revised Headspace Gas Random Sample Selection Memorandum for Waste Stream AERHDM Lot 2, Being Characterized by the Central Characterization Project at the Argonne National Laboratory CP:08:00442 - Revised Headspace Gas Random Sample Selection Memorandum for Waste Stream AERHDM Lot 2, Being Characterized by	Y	Homogeneous and soil/gravel waste streams are not in the scope of this audit.

	WAP Requirement ¹ ANL/CCP Certification Audit, A-11-20, August 2-4, 2011 Table C6-1 Waste Analysis Plan (WAP) Checklist ¹	Procedure Documented		Example of Implementation/Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
				the Central Characterization Project at the Argonne National Laboratory CP:09:01411 – Subsequent Headspace Gas Random Sample Selection Memorandum for Waste Stream AERHDM Lot 3, Being Characterized by the Central Characterization Project at the Argonne National Laboratory CP:10:01504 - Subsequent Headspace Gas Random Sample Selection Memorandum for Waste Stream AERHDM Lot 4, Being Characterized by the Central Characterization Project at the Argonne National Laboratory (GEN-4)		
24	Are procedures in place to ensure that total analyses or TCLP of VOCs, SVOCs, and RCRA-regulated metals are performed on all core samples to determine if the waste exhibits a toxicity characteristic? (Section C-3a(2))	NA	NA	NA	NA	<u>Solids Sampling and Analysis is performed at the INL.</u>
	Are procedures in place to ensure that Acceptable Knowledge is used in waste characterization activities to delineate TRU mixed waste streams, to assess whether TRU mixed wastes comply with the TSDF-WAC, to assess whether TRU mixed waste exhibits a hazardous characteristic (20.4.1.200 NMAC, incorporating 40 CFR 261 Subpart C), and to assess whether TRU wastes are listed (20.4.1.200 NMAC, incorporating 40 CFR 261 Subpart D), and to estimate waste material parameter weights? (Section C-3b)	CCP-TP-005, S. 4.4.11 S. 4.4.16 S. 4.4.17 S. 4.4.27 S. 4.4.31 S. 4.4.34[K], [L] & [M] CCP-TP-500, S. 4.4	Y	CCP AK Summary Report for ANL RH Debris Waste, waste stream AERHDM, CCP-AK-ANLE-500 R6, S2.0 (AK-1) CCP AK Summary Report for ANL RH Debris Waste, waste stream AERHDM, CCP-AK-ANLE-500 R6, S5.4.2.3, 5.4.4, 5.4.5 (AK-1) AK Att. 6, Waste Form, Waste Material Parameters, Prohibited	Y	

	WAP Requirement ¹ ANL/CCP Certification Audit, A-11-20, August 2-4, 2011 Table C6-1 Waste Analysis Plan (WAP) Checklist ¹	Procedure Documented		Example of Implementation/Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
				Items and Packaging for waste stream AERHDM (AK-8) ANLRHVE11009 (AK-13) RHANLVE100013 (AK-14) RHANLVE100005 (AK-15) RHANLVE090002 (AK-16) RHANLVE060002 (AK-17) CCP AK Summary Report for ANL RH Debris Waste, waste stream AERHDM, CCP-AK-ANLE-500 R6, S5.4.2, tables 4, 5 (AK-1) AK Att. 5, Hazardous Constituents, for waste stream AERHDM (AK-7) CCP AK Summary Report for ANL RH Debris Waste, waste stream AERHDM, CCP-AK-ANLE-500 R6, S5.4.1.2, table 3 (AK-1) Memo attached to AK Att. 6, Waste Form, Waste Material Parameters, Prohibited Items and Packaging for waste stream AERHDM (AK-8)		
26	Are procedures in place to ensure that radiography and/or visual examination are used as necessary to: <ul style="list-style-type: none"> Examine a waste container to determine the physical form Identify observable liquid in excess of TSDF-WAC limits and containerized gases Verify the physical form matches the waste stream description	VE CCP-TP-500, Att. 1	Y	RHANLVE100009 RHANLVE100013 RHANLVE100016 RHANLVE110003 RHANLVE110007 ANLRHVE11009 (VE-1)	Y	

	WAP Requirement ¹ ANL/CCP Certification Audit, A-11-20, August 2-4, 2011 Table C6-1 Waste Analysis Plan (WAP) Checklist ¹	Procedure Documented		Example of Implementation/Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
(Section C-3c)						

	WAP Requirement ¹ ANL/CCP Certification Audit, A-11-20, August 2-4, 2011 Table C6-1 Waste Analysis Plan (WAP) Checklist ¹	Procedure Documented		Example of Implementation/Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
<u>27</u>	Are procedures in place to ensure that the following characterization activities shall occur for newly generated wastes: <ul style="list-style-type: none"> Acceptable Knowledge for all wastes, with sampling and analysis as necessary to augment AK including: <ul style="list-style-type: none"> Either visual examination during packaging or radiography (or VE in lieu of radiography) after packaging for all waste containers, ensuring this occurs prior to any treatment designed to supercompact waste Headspace gas analysis for randomly selected containers, except for qualifying waste containers belonging to LANL sealed sources waste streams Total VOC, SVOC, and Metals analyses for a selected number of homogeneous solids and soil/gravel waste containers as specified in Attachment C2 Evaluation of any TICs found in headspace gas and totals analyses (Section C-3d(1))	AK CCP-TP-005, S. 4.4 S. 4.5	Y	CCP AK Summary Report for ANL RH Debris Waste, waste stream AERHDM, CCP-AK-ANLE-500 R6 (AK-1) VE. ANLRHVE11009 (AK-13) RHANLVE100013 (AK-14) RHANLVE100005 (AK-15) HSG. ANHSGS100001 (AK-18) ECL10012M (AK-19) ANHSGS100003 (AK-20) ECL10033M (AK-21) HSG Random Container Selection Memo, Lot 2,3,4 (AK-11) HSG Summary Report Lot 2, 3,4 (AK-12) AK Waste Stream Characterization Checklist , Lot 9,15,22 (AK-24)	Y	
		PL CCP-TP-002, (All) CCP-TP-162, (All)	Y	RHANLVE110002 RHANLVE110007 ANLRHVE11008 (GEN-1) ANHSGS100003 ECL10033G ECL10033M (GEN-2) CP:08:00374 –	Y	Radiography and solids sampling and analysis are not in the scope of this audit.

	WAP Requirement ¹ ANL/CCP Certification Audit, A-11-20, August 2-4, 2011 Table C6-1 Waste Analysis Plan (WAP) Checklist ¹	Procedure Documented		Example of Implementation/Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
				Transmittal of Waste Stream Profile Form, Attachment 2, for Remote Handled Waste Stream AERHDM at the Argonne National Laboratory with Characterization Information Summary CP:08:00375 - Transmittal of Waste Stream Profile Form, Attachment 4, for Remote Handled Waste Stream AERHDM at the Argonne National Laboratory (GEN-3) CP:06:01623 – Headspace Gas Random Sample Selection Memorandum for Waste Stream AERHDM Lot 1, Being Characterized by the Central Characterization Project at the Argonne National Laboratory CP:07:01119 – Headspace Gas Random Sample Selection Memorandum for Waste Stream AERHDM Lot 2, Being Characterized by the Central Characterization Project at the Argonne National Laboratory CP:08:00407 – Revised Headspace Gas Random Sample Selection Memorandum for Waste Stream AERHDM Lot 2, Being Characterized by the Central Characterization Project at the Argonne National Laboratory		

	WAP Requirement ¹ ANL/CCP Certification Audit, A-11-20, August 2-4, 2011 Table C6-1 Waste Analysis Plan (WAP) Checklist ¹	Procedure Documented		Example of Implementation/Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
				CP:08:00412 - Revised Headspace Gas Random Sample Selection Memorandum for Waste Stream AERHDM Lot 2, Being Characterized by the Central Characterization Project at the Argonne National Laboratory CP:08:00442 - Revised Headspace Gas Random Sample Selection Memorandum for Waste Stream AERHDM Lot 2, Being Characterized by the Central Characterization Project at the Argonne National Laboratory CP:09:01411 - Subsequent Headspace Gas Random Sample Selection Memorandum for Waste Stream AERHDM Lot 3, Being Characterized by the Central Characterization Project at the Argonne National Laboratory CP:10:01504 - Subsequent Headspace Gas Random Sample Selection Memorandum for Waste Stream AERHDM Lot 4, Being Characterized by the Central Characterization Project at the Argonne National Laboratory (GEN-4)		
27a	Are procedures in place to ensure that the visual examination during packaging for all waste containers includes the documentation of packaging configuration, type and number of filters, and rigid liner vent hole presence and diameter necessary to determine the appropriate DAC in accordance with Permit Attachment C1, Section	CCP-TP-500, Att.1	Y	RHANLVE100009 RHANLVE100013 RHANLVE100016 RHANLVE110003 RHANLVE110007	Y	

	WAP Requirement ¹ ANL/CCP Certification Audit, A-11-20, August 2-4, 2011 Table C6-1 Waste Analysis Plan (WAP) Checklist ¹	Procedure Documented		Example of Implementation/Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
DATA GENERATION, VERIFICATION, VALIDATION, DOCUMENTATION, AND QUALITY ASSURANCE						
30	<p>Are procedures in place to ensure that the following Data Quality Objectives are met:</p> <ul style="list-style-type: none"> Use Acceptable Knowledge to delineate TRU mixed waste streams, assess whether TRU mixed wastes comply with the applicable requirements of the TSDF-WAC, assess whether TRU mixed wastes exhibit a hazardous characteristic, assess whether TRU mixed wastes are listed and to estimate waste material parameter weights Use Headspace gas sampling and analysis, as necessary, to identify and quantify VOCs in waste containers to resolve the assignment of EPA hazardous waste numbers Perform totals analyses of homogeneous solids and soils/gravel wastes to establish if the waste is hazardous based on the toxicity characteristics levels in 20.4.1.200 NMAC through a comparison of the upper confidence limits (UCL₉₀) of the mean concentrations to resolve the assignment of hazardous waste numbers <p>Use radiography or visual examination to determine physical waste form, the absence of prohibited items, and additional waste characterization techniques that may be used based on Summary Category Groups (Section C-4a(1))</p>	<p>AK CCP-TP-005, S. 4.4.11 S. 4.4.16 S. 4.4.17 S. 4.4.27 S. 4.4.31 S. 4.4.34[K], [L] & [M] CCP-TP-500, S. 4.4</p>	Y	<p>CCP AK Summary Report for ANL RH Debris Waste, waste stream AERHDM, CCP-AK-ANLE-500 R6, S2.0 (AK-1) CCP AK Summary Report for ANL RH Debris Waste, waste stream AERHDM, CCP-AK-ANLE-500 R6, S5.4.2.3, 5.4.4, 5.4.5 (AK-1) AK Att. 6, Waste Form, Waste Material Parameters, Prohibited Items and Packaging for waste stream AERHDM (AK-8) VE BDRS. ANLRHVE11009 (AK-13) RHANLVE100013 (AK-14) RHANLVE100005 (AK-15) RHANLVE090002 (AK-16) RHANLVE060002 (AK-17) CCP AK Summary Report for ANL RH Debris Waste, waste stream AERHDM, CCP-AK-ANLE-500 R6, S5.4.2, tables 4, 5 (AK-1) AK Att. 5, Hazardous Constituents, for waste stream AERHDM (AK-7) CCP AK Summary Report for ANL RH</p>	Y	

	WAP Requirement ¹ ANL/CCP Certification Audit, A-11-20, August 2-4, 2011 Table C6-1 Waste Analysis Plan (WAP) Checklist ¹	Procedure Documented		Example of Implementation/Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
		<u>PL</u> CCP-TP-002, (All)	Y	Debris Waste, waste stream AERHDM, CCP-AK-ANLE-500 R6, S5.4.1.2, table 3 (AK-1) Memo attached to AK Att. 6, Waste Form, Waste Material Parameters, Prohibited Items and Packaging for waste stream AERHDM (AK-8) RHANLVE110002 RHANLVE110007 ANLRHVE11008 (GEN-1) ANHSGS100003 ECL10033G ECL10033M (GEN-2) CP:08:00374 – Transmittal of Waste Stream Profile Form, Attachment 2, for Remote Handled Waste Stream AERHDM at the Argonne National Laboratory with Characterization Information Summary CP:08:00375 - Transmittal of Waste Stream Profile Form, Attachment 4, for Remote Handled Waste Stream AERHDM at the Argonne National Laboratory (GEN-3)	Y	Radiography and solids sampling and analysis are not in the scope of this audit.
31	Are procedures in place to ensure that the following Quality Assurance Objectives are adequately defined and assessed for each characterization method: <ul style="list-style-type: none"> Precision as a measure of the mutual agreement among multiple measurements. Accuracy as the degree of agreement between a measurement result and a true or known value. Completeness is a measure of the amount of valid data obtained from a 	<u>HG</u> CCP-TP-106, Att. 3 <u>VE</u> CCP-TP-500, Att. 2	Y Y	ANHSGS100003 (HSG-1) RHANLVE100009 RHANLVE100013	Y Y	Radiography and solids sampling and analysis are not in the scope of this audit.

	WAP Requirement ¹ ANL/CCP Certification Audit, A-11-20, August 2-4, 2011 Table C6-1 Waste Analysis Plan (WAP) Checklist ¹	Procedure Documented		Example of Implementation/Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
	<p>method compared to the total amount of data obtained that is expressed as a percentage.</p> <ul style="list-style-type: none"> Comparability is the degree to which one data set can be compared to another data set. <p>Representativeness as an expression of the degree to which data represent characteristics of a population.</p> <p>(Section C-4a(2))</p>			RHANLVE100016 RHANLVE110003 RHANLVE110007 ANLRHVE11009 (VE-1)		
	<p>With respect to data generation, are procedures in place to ensure that the generator/storage site's waste characterization program meets the following general requirements:</p> <ul style="list-style-type: none"> Analytical data packages and batch data reports must be reported accurately in a pre-approved format, must be maintained in permanent files, and must be traceable? <p>All data must receive a technical review by another qualified analyst or the technical supervisor, and the laboratory QA officer?</p> <p>(Section C3-10a)</p>	<p>HG CCP-TP-106, (All) CCP-TP-093, (All)</p> <p>VE CCP-TP-500, Att. 1 Att. 2</p>	<p>Y</p> <p>Y</p>	<p>ANHSGS100003 (HSG-1)</p> <p>RHANLVE100009 RHANLVE100013 RHANLVE100016 RHANLVE110003 RHANLVE110007 ANLRHVE11009 (VE-1)</p>	<p>Y</p> <p>Y</p>	
33	<p>Are procedures in place to ensure that the generator/storage site performs validation of waste characterization data for each waste container?</p> <p>(Section C-4)</p>	<p>PL CCP-TP-001, S. 4.2 CCP-TP-500, Att. 1 Att. 2 CCP-TP-106, Att. 3</p> <p>HG CCP-TP-106, (All)</p> <p>VE CCP-TP-500, Att. 1 Att. 2</p>	<p>Y</p> <p>Y</p> <p>Y</p>	<p>RHANLVE110002 RHANLVE110007 ANLRHVE11008 (GEN-1) ANHSGS100003 ECL10033G ECL10033M (GEN-2)</p> <p>ANHSGS100003 (HSG-1)</p> <p>RHANLVE100009 RHANLVE100013 RHANLVE100016 RHANLVE110003 RHANLVE110007 ANLRHVE11009 (VE-1)</p>	<p>Y</p> <p>Y</p> <p>Y</p>	

	WAP Requirement ¹ ANL/CCP Certification Audit, A-11-20, August 2-4, 2011 Table C6-1 Waste Analysis Plan (WAP) Checklist ¹	Procedure Documented		Example of Implementation/Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
34	Are procedures in place to ensure that the generator/storage site has a pre-approved format for reporting waste characterization data? (Section C-4a(4))	PL CCP-TP-001, S. 4.2 CCP-TP-500, Att. 1 Att. 2 Att. 3 CCP-TP-106, (All)	Y	RHANLVE110002 RHANLVE110007 ANLRHVE11008 (GEN-1) ANHSGS100003 ECL10033G ECL10033M (GEN-2) CP:08:00374 - Transmittal of Waste Stream Profile Form, Attachment 2, for Remote Handled Waste Stream AERHDM at the Argonne National Laboratory with Characterization Information Summary CP:08:00375 - Transmittal of Waste Stream Profile Form, Attachment 4, for Remote Handled Waste Stream AERHDM at the Argonne National Laboratory (GEN-3)	Y	
		HG CCP-TP-106, (All)	Y	ANHSGS100003 (HSG-1)	Y	
		VE CCP-TP-500, Att. 1 Att. 2	Y	RHANLVE100009 RHANLVE100013 RHANLVE100016 RHANLVE110003 RHANLVE110007 ANLRHVE11009 (VE-1)	Y	
35	Are procedures in place to ensure that the generator/storage site prepares analytical, testing, and sampling batch data reports to meet the requirements of their own site-specific QAPJP and/or SOPs? (Section C-4a(4))	PL CCP-TP-001, S. 4.2 CCP-TP-500, (All) CCP-TP-093, (All)	Y	RHANLVE110002 RHANLVE110007 ANLRHVE11008 (GEN-1) ANHSGS100003 ECL10033G	Y	

	WAP Requirement ¹ ANL/CCP Certification Audit, A-11-20, August 2-4, 2011 Table C6-1 Waste Analysis Plan (WAP) Checklist ¹	Procedure Documented		Example of Implementation/Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
	used and reported in the proper units and significant figures <ul style="list-style-type: none"> Calculations have been verified by a valid calculation program, a spot check of verified calculation programs, and/or a 100 percent check of all hand calculations The data have been reviewed for transcription errors The testing, sampling, and analytical QA documentation for BDRs is complete and includes, as applicable, raw data, DAC and equilibrium calculations and times, calculation records, chain of custody forms, calibration records, QC sample results and copies or originals of gas canister sample tags. All QC sample results are within established control limits, and if not, the data has been appropriately qualified Reporting flags were assigned correctly Sample holding times and preservation requirements were met, or exceptions documented Radiography tapes are reviewed on a waste container basis at a minimum of once per testing batch or once per day of operation, whichever is less frequent. The radiography tape will be reviewed against the data on the radiography form to ensure that data are complete and correct Field sampling records are complete QAOs have been met (Section C3-10a(1))			RHANLVE110003 RHANLVE110007 ANLRHVE11009 (VE-1)		
40	Are procedures in place to ensure that 100 percent of all batch data reports receive a Site Project Manager signature release with an associated review checklist prior to characterization of the associated waste and shipment to the WIPP. This release shall ensure the following: <ul style="list-style-type: none"> The Site Project Manager or designee shall determine the validity of the drum age criteria (DAC) assignment made at the data generation level based upon an assessment of the data collection and evaluation necessary to make the assignment. Testing batch QC checks were properly performed. Radiography data are complete and acceptable based on evidence of videotape review of one waste container per day or once per testing batch, whichever is less frequent Sampling batch QC checks were properly performed, and meet the established QAOs and are within established data usability criteria Analytical batch QC checks were properly performed and meet the established QAOs and are within established data usability criteria Online batch QC checks were properly performed and meet the 	CCP-TP-001, S. 4.2 CCP-TP-162, (All) CCP-TP-500, Att. 2 & 3	Y	RHANLVE110002 RHANLVE110007 ANLRHVE11008 (GEN-1) ANHSGS100003 ECL10033G ECL10033M (GEN-2) CP:08:00374 – Transmittal of Waste Stream Profile Form, Attachment 2, for Remote Handled Waste Stream AERHDM at the Argonne National Laboratory with Characterization Information Summary CP:08:00375 - Transmittal of Waste Stream Profile Form,		

	WAP Requirement ¹ ANL/CCP Certification Audit, A-11-20, August 2-4, 2011 Table C6-1 Waste Analysis Plan (WAP) Checklist ¹	Procedure Documented		Example of Implementation/Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
	<p>established QAOs and are within established data usability criteria</p> <ul style="list-style-type: none"> • Proper procedures were followed to ensure representative samples of headspace gas and homogeneous solids and soil/gravel were taken • Data generation level independent technical review, validation, and verification have been performed as evidenced by the completed review checklists and appropriate signature releases. • Independent technical reviewers were not involved in the generation or recording of the data under review. • Batch Data review checklists are complete • Batch Data Reports are complete and data properly reported <p>Verify that data are within established data assessment criteria and meet all applicable QAOs</p> <p>(Section C3-10(b)(1))</p>			<p>Attachment 4, for Remote Handled Waste Stream AERHDM at the Argonne National Laboratory (GEN-3) CP:06:01623 – Headspace Gas Random Sample Selection Memorandum for Waste Stream AERHDM Lot 1, Being Characterized by the Central Characterization Project at the Argonne National Laboratory CP:07:01119 – Headspace Gas Random Sample Selection Memorandum for Waste Stream AERHDM Lot 2, Being Characterized by the Central Characterization Project at the Argonne National Laboratory CP:08:00407 – Revised Headspace Gas Random Sample Selection Memorandum for Waste Stream AERHDM Lot 2, Being Characterized by the Central Characterization Project at the Argonne National Laboratory CP:08:00412 - Revised Headspace Gas Random Sample Selection Memorandum for Waste Stream AERHDM Lot 2, Being Characterized by the Central Characterization Project at the Argonne National Laboratory CP:08:00442 - Revised</p>		

	WAP Requirement ¹ ANL/CCP Certification Audit, A-11-20, August 2-4, 2011 Table C6-1 Waste Analysis Plan (WAP) Checklist ¹	Procedure Documented		Example of Implementation/Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
				Headspace Gas Random Sample Selection Memorandum for Waste Stream AERHDM Lot 2, Being Characterized by the Central Characterization Project at the Argonne National Laboratory CP:09:01411 - Subsequent Headspace Gas Random Sample Selection Memorandum for Waste Stream AERHDM Lot 3, Being Characterized by the Central Characterization Project at the Argonne National Laboratory CP:10:01504 - Subsequent Headspace Gas Random Sample Selection Memorandum for Waste Stream AERHDM Lot 4, Being Characterized by the Central Characterization Project at the Argonne National Laboratory (GEN-4)		
	Are procedures in place to ensure that a repeat of the data review process at the data generation level will be performed on a minimum of one randomly chosen waste container every quarter to determine if the verification and validation is performed according to documented procedures? (Section C3-10b)	CCP-TP-001, S. 4.3	Y	CP:10:01601 3Q2010 VE CP:10:01715 3Q2010 VE CP:11:01007 4Q2010 VE CP:11:01106 4Q2010 VE CP:11:01205 1Q2011 VE CP:11:01329 1Q2011 VE CP:11:01473 2Q2011 VE CP:11:01521 2Q2011 VE CP:10:01599 3Q2010 HG CP:10:01756 3Q2010 HG CP:10:01426 2Q2010 HG CP:10:01525 2Q2010 HG CP:11:01006 4Q2010 HG CP:11:01128 4Q2010 HG (GEN-5)	Y	
43	Are procedures in place and checklists are available to prepare a Site Project	CCP-TP-001,	Y	RHANLVE110002	Y	

	WAP Requirement ¹ ANL/CCP Certification Audit, A-11-20, August 2-4, 2011 Table C6-1 Waste Analysis Plan (WAP) Checklist ¹	Procedure Documented		Example of Implementation/Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
	Manager (SPM) Summary and a Data Validation Summary (the summaries may be in the same document)? The SPM Summary includes a validation checklist for each batch that is of sufficient detail to document all aspects of a batch data report that could affect data quality. The Data Validation Summary must identify each Batch Data Report reviewed, describe how the validation was performed, identify all problems, and identify all acceptable and unacceptable data. Summaries must include release signatures. (Section C3-10b(2))	S. 3.1.6 S. 3.1.8 S. 4.2 CCP-TP-500, Att. 3		RHANLVE110007 ANLRHVE11008 (GEN-1) ANHSGS100003 ECL10033G ECL10033M (GEN-2)		
	Are procedures in place to ensure that non-administrative, WAP-related nonconformances first identified at the site project manager level are reported to the Permittees within seven calendar days of identification, that nonconformance reports are prepared within 30 calendar days, and that corrective action is implemented prior to waste shipment? (Section C3-13)	CCP-QP-005, S. 2.4	Y	2011 RHANL NCR Logs (GEN-9)	Y	There were no NCRs that required being reported to the Permittee.
45	Are procedures in place to ensure that any waste container for which a nonconformance report (NCR) has been written will not be shipped to the WIPP facility unless the condition that led to the NCR for that container is appropriately identified, reconciled, corrected, and documented? Are nonconformance reports prepared for nonconformances identified? Are nonconformances identified and tracked, and does the Site Project Manager oversee the nonconformance report process? (Section C3-13)	CCP-QP-005, (All)	Y	Records packages for the following NCRs: NCR-RHANL-0501-10, NCR-RHANL-0502-10, NCR-RHANL-0503-10, NCR-RHANL-0504-10, NCR-RHANL-2343-11, NCR-RHANL-0400-11, NCR-RHANL-2254-11, NCR-RHANL-2255-11 (GEN-8) 2010 RHANL NCR Log Reconciliation Reports (GEN-9)	Y	
SAMPLE CONTROL						
46	Are procedures in place to ensure that the site's sample handling and control program includes the following: <ul style="list-style-type: none"> • Field documentation of samples including point of origin, date of sample, container identification, sample type, analysis requested, and chain-of-custody (COC) number? • Proper labeling and/or tagging including proper sample numbering, sample identification, sample date, sampling conditions, and analysis requested? • COC record including name of sample relinquisher, sample receiver, and date and time of sample transfer? and • Proper sample handling and preservation? (Section C-4a(3))	CCP-TP-093, Att. 1	Y	ANHSGS100003 (HSG-1)	Y	

	WAP Requirement ¹ ANL/CCP Certification Audit, A-11-20, August 2-4, 2011 Table C6-1 Waste Analysis Plan (WAP) Checklist ¹	Procedure Documented		Example of Implementation/Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
47	Are procedures in place to ensure that the site's QAPJP or site-specific procedures includes COC forms to control the sample from the point of origin to the final analysis result reporting? (Section C-4a(3))	CCP-TP-106, (All) CCP-TP-093, Att. 1	Y	ANHSGS100003 (HSG-1)	Y	
DATA TRANSMITTAL						
	Are procedures in place to ensure that the generator/storage site transmits data by hard copy or electronic copy from the data generation level to the site project level? If electronic, does the generator/site have a hard copy available on demand? (Section C-4a(6))	CCP-TP-001, S. 4.2 CCP-TP-500, S. 4.3.8 S. 4.3.9	Y	RHANLVE110002 RHANLVE110007 ANLRHVE11008 (GEN-1) ANHSGS100003 ECL10033G ECL10033M (GEN-2)	Y	
50	Are procedures in place to ensure that the generator/storage site inputs the data into the WWIS manually or electronically? (Section C-4a(6))	CCP-TP-530, (All)	Y	Draft characterization data packages for the following containers were reviewed which included CCP data spreadsheet reports, pages from batch data reports showing analyses values, and WWIS/WDS Container Data Reports. RH Package for Canister AE0089, including three containers: Drum #1005 Drum #1028 Drum #955 (GEN-10)	Y	
51	Are procedures in place to ensure that the generator/storage site enters the data into the WWIS in the exact format required by the database? (Section C-4a(6))	CCP-TP-530, (All)	Y	Draft characterization data packages for the following containers were reviewed which included CCP data spreadsheet reports, pages from batch data reports showing analyses values, and WWIS/WDS Container Data Reports. RH Package for Canister AE0089 including three containers:	Y	

	WAP Requirement ¹ ANL/CCP Certification Audit, A-11-20, August 2-4, 2011 Table C6-1 Waste Analysis Plan (WAP) Checklist ¹	Procedure Documented		Example of Implementation/Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
				Drum #1005 Drum #1028 Drum #955 (GEN-10)		
51a	Are procedures in place to ensure that if a container was part of a composite headspace gas sample, the analytical results from the composite sample must be assigned as the container headspace gas data results, including associated TICs, for every waste container associated with the composite sample in the WWIS? (Section C3-12b(4))	N/A	NA	N/A	NA	ANL/CCP does not composite headspace gas samples.
52	Are procedures in place to ensure all of the data presented on Table C-7 of the Permit is transmitted to the WWIS? (Table C-7)	CCP-TP-530, (All)	Y	Draft characterization data packages for the following containers were reviewed which included CCP data spreadsheet reports, pages from batch data reports showing analyses values, and WWIS/WDS Container Data Reports. RH Package for Canister AE0089 including three containers: Drum #1005 Drum #1028 Drum #955 (GEN-10)	Y	
RECORDS AND RECORD MANAGEMENT						
	Are procedures in place to ensure that the generator/storage site's hard copy and/or electronic data reports follow the Permittees' format requirements? (Section C-4a(4))	CCP-TP-001, S. 4.2 CCP-TP-500, S. 4.3.8 S. 4.3.9	Y	RHANLVE110002 RHANLVE110007 ANLRHVE11008 (GEN-1) ANHSGS100003 ECL10033G ECL10033M (GEN-2) CP:08:00374 – Transmittal of Waste Stream Profile Form, Attachment 2, for Remote Handled Waste Stream AERHDM at the Argonne National Laboratory with Characterization Information Summary	Y	

	WAP Requirement ¹ ANL/CCP Certification Audit, A-11-20, August 2-4, 2011 Table C6-1 Waste Analysis Plan (WAP) Checklist ¹	Procedure Documented		Example of Implementation/Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
				CP:08:00375 - Transmittal of Waste Stream Profile Form, Attachment 4, for Remote Handled Waste Stream AERHDM at the Argonne National Laboratory (GEN-3)		
	Are procedures in place to ensure that hard copy or electronic Waste Stream Profile Form will include the following: <ul style="list-style-type: none"> • Generator/storage site name • Generator/storage site EPA ID • Date of audit report approval by NMED (if obtained) • Original generator of waste stream • Whether waste is Contact-Handled or Remote-Handled • Waste Stream WIPP Identification Number • Summary Category Group • Waste Matrix Code Group • Waste Material Parameter Weight Estimates per unit of waste • Waste stream name • A description of the waste stream • Applicable EPA hazardous waste codes numbers • Applicable TRUCON codes • A listing of acceptable knowledge documentation used to identify the waste stream • The waste characterization procedures used and the reference and date of the procedure Certification signature of Site Project Manager, name, title, and date signed (Section C3-12b(1))	CCP-TP-002, S. 4.3	Y	CP:08:00374 - Transmittal of Waste Stream Profile Form, Attachment 2, for Remote Handled Waste Stream AERHDM at the Argonne National Laboratory with Characterization Information Summary CP:08:00375 - Transmittal of Waste Stream Profile Form, Attachment 4, for Remote Handled Waste Stream AERHDM at the Argonne National Laboratory (GEN-3)	Y	
56a	Are procedures in place to ensure that hard copy or electronic Characterization Information Summary will include the following: <ul style="list-style-type: none"> • Data reconciliation with DQOs • Headspace gas summary data listing the identification numbers of samples used in the statistical reduction, the maximum, mean, standard deviation, UCL₉₀, RTL, and associated EPA hazardous waste numbers that must be applied to the waste stream. • Total metal, VOC, and SVOC analytical results for homogeneous solids 	CCP-TP-002, S. 4.4	Y	RHANLVE110002 RHANLVE110007 ANLRHVE11008 (GEN-1) ANHSGS100003 ECL10033G ECL10033M (GEN-2) CP:08:00374 - Transmittal of Waste	Y	Radiography and solids sampling and analysis are not in the scope of this audit.

	WAP Requirement ¹ ANL/CCP Certification Audit, A-11-20, August 2-4, 2011 Table C6-1 Waste Analysis Plan (WAP) Checklist ¹	Procedure Documented		Example of Implementation/Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
	and soil/gravel (if applicable). <ul style="list-style-type: none"> TIC listing and evaluation. Radiography and visual examination summary to document that all prohibited items are absent in the waste (if applicable). A complete listing of all container identification numbers used to generate the Waste Stream Profile Form, cross-referenced to each Batch Data Report. Complete AK summary, including stream name and number, point of generation, waste stream volume (current and projected), generation dates, TRUCON codes, Summary Category Group, Waste Matrix Code(s) and Waste Matrix Code Group, other TWBIR information, waste stream description, areas of operation, generating processes, RCRA determinations, radionuclide information, all references used to generate the AK summary, and any other information required by Permit Attachment C4, Section C4-2b. Method for determining Waste Material Parameter Weights per unit of waste. List of any AK Sufficiency Determinations requested for the waste stream. Certification through acceptable knowledge or testing and/or analysis that any waste assigned the hazardous waste number of U134 (hydrofluoric acid) no longer exhibits the characteristic of corrosivity. This is verified by ensuring that no liquid is present in U134 waste. A justification for the selection of radiography and/or VE as an appropriate method of characterizing the waste. (Section C3-12b(2))			Stream Profile Form, Attachment 2, for Remote Handled Waste Stream AERHDM at the Argonne National Laboratory with Characterization Information Summary CP:08:00375 - Transmittal of Waste Stream Profile Form, Attachment 4, for Remote Handled Waste Stream AERHDM at the Argonne National Laboratory (GEN-3)		
56b	Are procedures in place to assure that ongoing container characterization results are cross referenced to Batch Data Reports? (Section C3-12b)	CCP-TP-002, S. 4.4	Y	RHANLVE110002 RHANLVE110007 ANLRHVE11008 (GEN-1) ANHSGS100003 ECL10033G ECL10033M (GEN-2)	Y	
58	Are procedures in place to ensure that project level reports are compiled into Characterization Information Summaries? (Section C3-12b)	CCP-TP-002, S. 4.4	Y	RHANLVE110002 RHANLVE110007 ANLRHVE11008 (GEN-1) ANHSGS100003 ECL10033G ECL10033M (GEN-2) CP:08:00374 -	Y	

	WAP Requirement ¹ ANL/CCP Certification Audit, A-11-20, August 2-4, 2011 Table C6-1 Waste Analysis Plan (WAP) Checklist ¹	Procedure Documented		Example of Implementation/Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
				Transmittal of Waste Stream Profile Form, Attachment 2, for Remote Handled Waste Stream AERHDM at the Argonne National Laboratory with Characterization Information Summary CP:08:00375 - Transmittal of Waste Stream Profile Form, Attachment 4, for Remote Handled Waste Stream AERHDM at the Argonne National Laboratory (GEN-3)		
59	Are procedures in place to ensure that the generator/storage site uses forms for data reporting that are pre-approved forms in site-specific documentation? (Section C3-12)	HG CCP-TP-093, Att. 1 Att. 2 CCP-TP-106, Att. 1 Att. 2 Att. 3 VE CCP-TP-500, Att. 1 Att. 2	Y Y	ANHSGS100003 (HSG-1) RHANLVE100009 RHANLVE100013 RHANLVE100016 RHANLVE110003 RHANLVE110007 ANLRHVE11009 (VE-1)	Y Y	

	<p>WAP Requirement¹ ANL/CCP Certification Audit, A-11-20, August 2-4, 2011 Table C6-1 Waste Analysis Plan (WAP) Checklist¹</p>	Procedure Documented		Example of Implementation/Objective Evidence, as applicable		<p>Comment (e.g., any change in procedure since last audit, etc.)</p>
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
60	<p>Are procedures in place to ensure that the generator/storage site's site project manager submits to the WIPP facility a summary of the waste stream information and reconciliation with data quality objectives (DQOs) once a waste stream is characterized? (Section C-4a(6))</p>	CCP-TP-002, S. 4.6	Y	<p>CP:08:00374 – Transmittal of Waste Stream Profile Form, Attachment 2, for Remote Handled Waste Stream AERHDM at the Argonne National Laboratory with Characterization Information Summary CP:08:00375 - Transmittal of Waste Stream Profile Form, Attachment 4, for Remote Handled Waste Stream AERHDM at the Argonne National Laboratory (GEN-3)</p>	Y	
61	<p>Are procedures in place to ensure that the generator/storage site project office completes a WSPF based on the Batch Data Reports? (Section C3-12b)</p>	CCP-TP-002, S. 4.3	Y	<p>CP:08:00374 – Transmittal of Waste Stream Profile Form, Attachment 2, for Remote Handled Waste Stream AERHDM at the Argonne National Laboratory with Characterization Information Summary CP:08:00375 - Transmittal of Waste Stream Profile Form, Attachment 4, for Remote Handled Waste Stream AERHDM at the Argonne National Laboratory (GEN-3)</p>	Y	
62	<p>Are procedures in place to ensure that the generator/storage Site Project Manager submits the WSPF to the Permittees for DOE's approval along with the accompanying Characterization Information Summary for that waste stream? (Section C-4a(6))</p>	CCP-TP-002, S. 4.6	Y	<p>CP:08:00374 – Transmittal of Waste Stream Profile Form, Attachment 2, for Remote Handled Waste Stream AERHDM at the Argonne National Laboratory with Characterization Information Summary CP:08:00375 - Transmittal of Waste Stream Profile Form,</p>	Y	

	WAP Requirement ¹ ANL/CCP Certification Audit, A-11-20, August 2-4, 2011 Table C6-1 Waste Analysis Plan (WAP) Checklist ¹	Procedure Documented		Example of Implementation/Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
				Attachment 4, for Remote Handled Waste Stream AERHDM at the Argonne National Laboratory (GEN-3)		
63	Are procedures in place to ensure that the generator/storage site maintains records related to waste characterization sampling and analysis activities in the testing, sampling or analytical facilities files, or site project files for those facilities located on-site? (Section C-4a(7))	CCP-QP-008 (All) CCP-QP-028 (All)	Y	CCP RH (All Sites) Records Inventory and Disposition Schedule (RIDS) dated 2/21/2011 (GEN-11)	Y	
64	Are procedures in place to ensure that the appropriate documented training and indoctrination is performed for all individuals and that procedures are documented in site specific QAPjPs and procedures? (Section C3-14)	CCP-PO-001 S. C3-14 CCP-QP-002 S. 4.0	Y	RH Program – ANLE List of Qualified Individuals (LOQI) dated 8/2/2011 (GEN-12) Qualification records for selected CCP personnel. (GEN-13)	Y	
65	Are procedures in place to ensure that the generator/storage site requires contract waste analytical facilities to forward testing, sampling and analytical records along with testing, sampling and analytical batch data reports to the site project office for inclusion in the sites project files? (Section C-4a(7))	CCP-QP-008 S. 4.10	Y	CCP RH (All Sites) Records Inventory and Disposition Schedule (RIDS) dated 2/21/2011 (GEN-11)	Y	
66	Are procedures in place to ensure that the generator/storage site has an appropriate records inventory and disposition schedule (RIDS) or equivalent that was prepared and approved by appropriate site personnel? (Section C-4a(7))	CCP-QP-008 S. 3.1.2 CCP-QP-028 S. 3.1.1	Y	CCP RH (All Sites) Records Inventory and Disposition Schedule (RIDS) dated 2/21/2011 (GEN-11)	Y	
67	Are procedures in place to ensure that the generator/storage site maintains all records relevant to an enforcement action, regardless of disposition, until they are no longer needed for enforcement action, and then dispositioned per the approved RIDS? (Section C-4a(7))	CCP-PO-001 S. C-4a(7) CCP-QP-008 S. 4.15.1 NOTE CCP-QP-028 (All)	Y	CCP RH (All Sites) Records Inventory and Disposition Schedule (RIDS) dated 2/21/2011 (GEN-11)	Y	
68	Are procedures in place to ensure that the generator/storage site maintains records that are designated as Lifetime Records for the life of the waste characterization program plus six years or that the records have been transferred to the WIPP Records Archive facility? Lifetime Records include: <ul style="list-style-type: none"> • Field sampling data forms, • Field and laboratory COC forms, • Test facility and laboratory Batch Data Reports, • Waste Stream Characterization Package, 	CCP-QP-008 (All) CCP-QP-028 (All)	Y	CCP RH (All Sites) Records Inventory and Disposition Schedule (RIDS) dated 2/21/2011 (GEN-11)	Y	

	WAP Requirement ¹ ANL/CCP Certification Audit, A-11-20, August 2-4, 2011 Table C6-1 Waste Analysis Plan (WAP) Checklist ¹	Procedure Documented		Example of Implementation/Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
		Att. 2		RHANLVE100016 RHANLVE110003 RHANLVE110007 ANLRHVE11009 (VE-1)		
71	Are procedures in place to ensure that if the generator/storage site ceases to operate, that all records be transferred before closeout? (Section C-4a(7))	CCP-QP-008 S. 4.10.2.B	Y	N/A	N/A	ANL/CCP is still in operation. Provisions have been made in the records implementing procedure.
SHIPMENT						
72	Are procedures in place to ensure that the generator/storage site accurately completes an EPA Hazardous Waste Manifest prior to shipping the waste to WIPP that contains the following information: <ul style="list-style-type: none"> • Generator/storage site name and EPA ID • Generator/storage site contact name and phone number • Quantity of waste • List of up to six state and/or federal hazardous waste numbers in each line item • Listing of all container IDS Signature of authorized generator representative (Section C-5b)	N/A	N/A	N/A	N/A	Shipments were not in the scope of this audit <u>as shipping activities were not available for review.</u> <u>CCP Site wide transportation activities were reviewed during CBFO Audit A-11-24.</u>
73	Are procedures in place to ensure that the generator/storage site accurately completes the following container specific information: <ul style="list-style-type: none"> • Waste stream identification number • List of hazardous waste numbers per container • Certification data Shipping data (Section C-5b)	N/A	N/A	N/A	N/A	Shipments were not in the scope of this audit <u>as shipping activities were not available for review.</u> <u>CCP Site wide transportation activities were reviewed during CBFO Audit A-11-24.</u>

1. The WAP requirements should be presented in documents, such as procedures. Each of the questions posed under WAP requirements is meant to ask whether procedures are in place or whether documents are evident which demonstrate that the specific WAP requirement is or can be met.

Appendix E
Redlined A-11-20 C6-3 Checklist

**Table C6-3 Acceptable Knowledge (AK) Checklist
ANL/CCP Certification Audit, A-11-20, August 2-4, 2011**

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Acceptable Knowledge (AK) Checklist¹

	WAP Requirement ² ANL/CCP Certification Audit, A-11-20, August 2-4, 2011 Table C6-3 Acceptable Knowledge (AK) Checklist	Procedure Documented		Example of Implementation/ Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why)	Item Reviewed	Adequate? Y/N	
GENERAL REQUIREMENTS						
134	Are the primary document(s) required in Permit Attachment C4 containing acceptable knowledge information available? (Section C4-2)	CCP-TP-002, (All) CCP-TP-005, S. 4.4	Y	CCP AK Summary Report for ANL RH Debris Waste, waste stream AERHDM, CCP-AK-ANLE-500 R6, (AK-1) Waste Stream Profile Form and attachments for waste stream AERHDM (AK-2) QMIS Approval for AK Summary for waste stream AERHDM (AK-3)	Y	During the week of August 7, 2011, CTAC conducted a recertification audit of ANLE for the RH S5000 debris stream AERHDM. The AK audit team examined the AK record and process for this waste stream generated in the AGHCF and the K Wing at ANLE with particular focus on the application of the new WAP requirements and the availability the AK documentation in records.
135	Has the generator developed a methodology whereby a logical sequence of acceptable knowledge information that progresses from general facility to more detailed waste-specific information can be acquired? (Section C4-2)	CCP-TP-005, S. 4.0	Y	CCP AK Summary Report for ANL RH Debris Waste, waste stream AERHDM, CCP-AK-ANLE-500 R6 (AK-1) AK Source Document Summaries for waste stream AERHDM (AK-4)	Y	
136	Does the site have adequate procedures in place to ensure that the Acceptable Knowledge process is adequately implemented? Do these procedures facilitate the mandatory traceability analysis performed for each Summary Waste Category Group examined during the audit? (Section C4-2)	CCP-TP-005, S. 4.0 CCP-TP-002, (All)	Y	CCP AK Summary Report for ANL RH Debris Waste, waste stream AERHDM, CCP-AK-ANLE-500 R6 (AK-1) Waste Stream Profile Form and attachments for waste stream AERHDM (AK-2) AK Source Document Summaries for waste stream AERHDM (AK-4) VE. ANLRHVE11009 (AK-13)	Y	A total of 5 drums were included in the required traceability exercise, consisting of one drum each from three HSGS lots sampled to date and two other drums randomly chosen. The drum numbers are: 1005 881 938 842 RW18909

	WAP Requirement ² ANL/CCP Certification Audit, A-11-20, August 2-4, 2011 Table C6-3 Acceptable Knowledge (AK) Checklist	Procedure Documented		Example of Implementation/ Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why)	Item Reviewed	Adequate? Y/N	
				RHANLVE100013 (AK-14) RHANLVE100005 (AK-15) RHANLVE090002 (AK-16) RHANLVE060002 (AK-17) HSG. ANHSGS100001 (AK-18) ECL10012M (AK-19) ANHSGS100003 (AK-20) ECL10033M (AK-21) ANHSGS090001 (AK-22) ECL09014M (AK-23) HSG Random Container Selection Memo, Lot 1,2, 3, 4 (AK-11) HSG Summary Report Lot 1, 2, 3,4 (AK-12) AK Waste Stream Characterization Checklist, Lot 1, 9, 15, 22 (AK-24) IDC Database screenshots (AK-27) AK Tracking Spreadsheet (AK-28) AK attachment 8 container list (AK-9)		
137	Does the generator site's TRU mixed waste management program information clearly define (or provide a methodology for defining) waste categorization schemes and terminology, provide a breakdown of the types and quantities of TRU mixed waste generated/stored at the site, and describe how waste is tracked and managed at the generator site (including historical and current operations? Do procedures	CCP-TP-005, S. 4.0 S. 4.2.2 S. 4.2.4 S. 4.2.5 S. 4.2.6	Y	CCP AK Summary Report for ANL RH Debris Waste, waste stream AERHDM, CCP-AK-ANLE-500 R6 (AK-1)	Y	

	WAP Requirement ² ANL/CCP Certification Audit, A-11-20, August 2-4, 2011 Table C6-3 Acceptable Knowledge (AK) Checklist	Procedure Documented		Example of Implementation/ Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why)	Item Reviewed	Adequate? Y/N	
	ensure that waste streams are adequately identified? (Section C4-2a)	Att. 8 CCP-TP-001, S. 2.7 S. 4.2		IDC Database screenshots (AK-27) AK Tracking Spreadsheet (AK-28) AK attachment 8 container list (AK-9)		
138	Does site documentation procedures indicate that the site will document, justify, and consistently define waste streams and assign EPA hazardous waste numbers? (Section C4-2b)	CCP-TP-005, S. 4.4.16- 4.4.21 Att. 5	Y	CCP AK Summary Report for ANL RH Debris Waste, waste stream AERHDM, CCP-AK-ANLE-500 R6, S5.4.2, tables 4, 5 (AK-1) AK Att. 5, Hazardous Constituents, for waste stream AERHDM (AK-7)	Y	

	WAP Requirement ² ANL/CCP Certification Audit, A-11-20, August 2-4, 2011 Table C6-3 Acceptable Knowledge (AK) Checklist	Procedure Documented		Example of Implementation/ Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why)	Item Reviewed	Adequate? Y/N	
	<p>B. Waste stream volume and time period of generation (e.g., 100 standard waste boxes of retrievable stored waste generated from June 1977 through December 1977)</p> <p>C. Waste generating process described for each building (e.g., batch waste stream generated during decommissioning operations of glove boxes), including processes associated with U134 waste generation, if applicable.</p> <p>D. Documentation demonstrating how the site has historically managed the waste, including the historical regulatory status of the waste (i.e., TRU mixed versus TRU non-mined waste)</p> <p>E. Process flow diagrams (e.g., a diagram illustrating glove boxes from a specific building to a size reduction facility to a container storage area). In the case of research/development, analytical laboratory waste, or the similar processes where process flow diagrams cannot be created, a description of the waste generating processes, rather than a formal process flow diagram, may be included if this modification is justified and the justification is placed in the auditable record</p> <p>F. Material inputs or other information that identifies the chemical content of the waste stream and the physical waste form (e.g., glove box materials and chemical handled during glove box operations, events or processes that may have modified the chemical or physical properties of the waste stream after generation, data obtained through visual examination of newly generated waste that later undergoes radiography; information demonstrating neutralization of U134 [hydrofluoric acid] and waste compatibility.</p> <p>(Section C4-2b)</p>			<p>B. S 5.2 (AK-1) AK Source Document Summaries, C2025 (AK-4)</p> <p>C. S. 5.3, Att. 3, 4 (AK-1)</p> <p>D. S. 5.4.2 (AK-1) AK Source Document Summaries, C351 (AK-4)</p> <p>E. S. 4.2.2, Att. 3, 4 (AK-1)</p> <p>F. S. 5.4.1, 5.4.2, tables 3, 4, 5 (AK-1)</p>	<p>Y</p> <p>Y</p> <p>Y</p> <p>Y</p> <p>Y</p>	
142	<p>Do site documents/procedures require that the facility will provide a summary to the Permittees that summarizes all information collected, including basis and rationale for all waste stream designations? Is an example of this summary available for audit review? If discrepant hazardous waste data exist in required information, do sites consider applying all hazardous waste numbers, but assess and evaluate the information to determine the appropriate hazardous waste number consistent with RCRA requirements? (Section C4-2b)</p>	<p>CCP-TP-005, S. 4.4 S. 4.9</p>	<p>Y</p>	<p>CCP AK Summary Report for ANL RH Debris Waste, waste stream AERHDM, CCP-AK-ANLE-500 R6 (AK-1) AK Discrepancy Resolutions (AK-10)</p>	<p>Y</p>	

	WAP Requirement ² ANL/CCP Certification Audit, A-11-20, August 2-4, 2011 Table C6-3 Acceptable Knowledge (AK) Checklist	Procedure Documented		Example of Implementation/ Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why)	Item Reviewed	Adequate? Y/N	
143	Do site procedures indicate that if the required AK information is not available for a particular waste stream, that the waste stream will not be eligible for an AK Sufficiency Determination? (Section C4-2)	CCP-TP-005, S. 4.2 S. 4.4 S. 4.7	Y	AK Documentation Checklist, Attachment 1, for waste stream AERHDM (AK-5)	Y	

	WAP Requirement ² ANL/CCP Certification Audit, A-11-20, August 2-4, 2011 Table C6-3 Acceptable Knowledge (AK) Checklist	Procedure Documented		Example of Implementation/ Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why)	Item Reviewed	Adequate? Y/N	
144	Have the following procedures been prepared?:	AK				
	A. Procedures for identifying and assigning the physical waste form of the waste	A. CCP-TP-005, S. 4.4.13 S. 4.4.14	Y	A: S. 5.4.1 (AK-1)	Y	
	B. Procedures for delineating waste streams and assigning Waste Matrix Codes	B. CCP-TP-005, S. 4.4.11 NOTE above S. 4.4.12	Y	B: S. 5.4.1.1 (AK-1)	Y	
	C. Procedures for resolving inconsistencies in acceptable knowledge documentation	C. CCP-TP-005, S. 4.9	Y	C. AK Discrepancy Resolutions (AK-10)	Y	
	D. Procedures for headspace gas sampling and analysis, visual examination and/or radiography, and homogeneous waste sampling and analysis, if applicable					
	E. For newly generated waste, procedures describing process controls used to ensure prohibited items (specified in the WAP, Permit Attachment C) are documented and managed	E. CCP-TP-500, (All)	Y	E. ANLRHVE11009 (AK-13) RHANLVE100013 (AK-14) RHANLVE100005 (AK-15)	Y	
	F. Procedures to ensure radiography and visual examination include a list of prohibited items that the operator shall verify are not present in each container (e.g. liquid exceeding TSDF-WAC limits, corrosives, ignitables, reactives, and incompatible wastes)					
	G. Procedures to document how changes to Waste Matrix Codes, waste stream assignment, and associated Environmental Protection Agency hazardous waste numbers based on material composition are documented for any waste	G. CCP-TP-005, S. 4.9	Y	G. AK Discrepancy Resolutions (AK-10)	Y	
	H. Procedures that ensure the assignment of EPA hazardous waste numbers is appropriate, consistent with RCRA requirements, and adequately considers site historical waste management	H. CCP-TP-005, S. 4.4.16 -4.4.21	Y	H. CCP AK Summary Report for ANL RH Debris Waste, waste stream AERHDM, CCP-AK-ANLE-500 R6, S5.4.2, tables 4, 5 (AK-1) AK Att. 5, Hazardous Constituents, for waste	Y	
	I. Procedures for estimating waste material parameter weights (Section C4-2b)					

	WAP Requirement ² ANL/CCP Certification Audit, A-11-20, August 2-4, 2011 Table C6-3 Acceptable Knowledge (AK) Checklist	Procedure Documented		Example of Implementation/ Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why)	Item Reviewed	Adequate? Y/N	
		I. CCP-TP-005, S. 4.4.27	Y	stream AERHDM (AK-7) I: CCP AK Summary Report for ANL RH Debris Waste, waste stream AERHDM, CCP-AK-ANLE-500 R6, S5.4.1.2, table 3 (AK-1) Memo attached to AK Att. 6, Waste Form, Waste Material Parameters, Prohibited Items and Packaging for waste stream AERHDM (AK-8)	Y	
		HSG Bullet D: CCP-TP-093, (All)	Y	ANHSGS100003 (HSG-1)	Y	<u>ANL/CCP performs only sampling. Analysis is done at INL/CCP Labs.</u>
		VE: Bullet D,E, F CCP-TP-500, (All)	Y	RHANLVE100009 RHANLVE100013 RHANLVE100016 RHANLVE110003 RHANLVE110007 ANLRHVE11009 (VE-1)	Y	
145	Does the generator provide procedures or written commitment to collect additional acceptable knowledge information, as available and as necessary to augment mandatory information? (Section C4-2c)	CCP-TP-005, S. 4.2.5 Att.1	Y	AK Documentation Checklist, Attachment 1, for waste stream AERHDM (AK-5)	Y	

	WAP Requirement ² ANL/CCP Certification Audit, A-11-20, August 2-4, 2011 Table C6-3 Acceptable Knowledge (AK) Checklist	Procedure Documented		Example of Implementation/ Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why)	Item Reviewed	Adequate? Y/N	
145a	<p>For waste containers that belong to LANL sealed sources waste streams, and for which headspace gas sampling and analysis is not required, are there procedures in place to assure the collection of the following additional AK?</p> <p>A. Documentation that the waste container contents meet the definition of sealed sources per 10 CFR §30.4 and 10 CFR §835.2 (effective January 1, 2004)</p> <p>B. Documentation of the certification of the sealed sources as U.S. Department of Transportation Special Form Class 7 (Radioactive) Material per 49 CFR §173.403 (effective October 1, 2003)</p> <p>C. Documentation of contamination survey results that validate the integrity of each sealed source per 10 CFR §34.27 (effective January 1, 2004).</p> <p>D. AK documentation does not indicate the use of VOCs or VOC-bearing materials as constituents of the sealed sources.</p> <p>E. The outer casing of each sealed source must be of a non-VOC bearing material, which must be verified at the time of packaging.</p> <p>F. AK documentation that includes but is not limited to, as available and as necessary to determine the hazardous constituents associated with sealed sources, the following: source manufacturer's sales catalogues, original purchase records, source manufacturer's fabrication documents, source manufacturer's drawings, source manufacturer's fuel capture assembly reports, source manufacturer's operational procedures for cleanliness requirements, source manufacturer's shipping documents, source manufacturer's welding records, transuranic batch material records, and information from national databases (e.g., NMMSS). All of this information may not and need not be available for each source, but sufficient information must be included in the auditable record to derive an adequate understanding of source construction and history to ensure that no VOCs are present in association with the sealed source itself that would render the source hazardous. If AK data indicate that assignment of a hazardous waste number related to organic materials is required in association with a source, this specific source will be assigned to a separate waste stream and that waste stream will be subject to headspace gas sampling unless a separate AK Sufficiency Determination is approved for the waste stream.</p> <p>(Section C4-2c)</p>	N/A	N/A	N/A	N/A	This is not a LANL audit
146	<p>Does the generator site document that all additional specific, relevant information used in the acceptable knowledge process will be identified and its use explained? Is all necessary information assembled and has it been appropriately used?</p> <p>(Section C4-2c)</p>	CCP-TP-005, S. 4.2.5 Att.1	Y	AK Documentation Checklist, Attachment 1, for waste stream AERHDM (AK-5)	Y	

	WAP Requirement ² ANL/CCP Certification Audit, A-11-20, August 2-4, 2011 Table C6-3 Acceptable Knowledge (AK) Checklist	Procedure Documented		Example of Implementation/ Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why)	Item Reviewed	Adequate? Y/N	
	<p>C. Sites must develop and implement a written procedure that ensures unacceptable wastes (e.g., reactive, ignitable, corrosive) are identified and segregated from TRU mixed waste populations sent to WIPP.</p> <p>D. Sites must prepare and implement a written procedure to evaluate acceptable knowledge and resolve discrepancies. For example, if different sources of information indicate different hazardous wastes are present, then sites must include all sources of information in its records and may choose to either conservatively assign hazardous waste numbers, or assign only those numbers deemed appropriate and consistent with RCRA requirements. All information used to justify assignment of hazardous waste numbers must be placed in the auditable record. Further, the assignment of hazardous waste numbers shall be tracked in the auditable record to all required documentation.</p>		Y	<p>AK Documentation Checklist, Attachment 1, for waste stream AERHDM (AK-5)</p> <p>C. CCP AK Summary Report for ANL RH Debris Waste, waste stream AERHDM, CCP-AK-ANLE-500 R6, S5.4.5 (AK-1)</p> <p>AK Att. 6, Waste Form, Waste Material Parameters, Prohibited Items and Packaging for waste stream AERHDM (AK-8)</p> <p>VE BDRS ANLRHVE11009 (AK-13)</p> <p>RHANLVE100013 (AK-14)</p> <p>RHANLVE100005 (AK-15)</p> <p>RHANLVE090002 (AK-16)</p> <p>RHANLVE060002 (AK-17)</p> <p>IDC Database with "reject field" (AK-27)</p> <p>D. AK Discrepancy Resolutions (AK-10)</p>	Y	
149a	E. Sites must prepare and implement a written procedure to identify hazardous wastes and assign the appropriate hazardous waste numbers to each waste stream. The following are minimum baseline requirements/standards that	CCP-TP-005, S. 1.1, S. 4.2 S. 4.3	Y	E1. CCP AK Summary Report for ANL RH Debris Waste, waste stream	Y	

	WAP Requirement ² ANL/CCP Certification Audit, A-11-20, August 2-4, 2011 Table C6-3 Acceptable Knowledge (AK) Checklist	Procedure Documented		Example of Implementation/ Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why)	Item Reviewed	Adequate? Y/N	
	<p>site-specific procedures must include to ensure comparable and consistent characterization of hazardous waste:</p> <ol style="list-style-type: none"> 1. Compile all of the required information in an auditable record. 2. Review the compiled information and delineate waste streams. Delineation of waste streams must comply with the WAP definition in Permit Attachment C, Section C-0a, and justify combining waste historically managed separately as TRU mixed and TRU non-mixed waste streams into a single waste stream 3. Review the compiled information to determine if the waste stream is compliant with the TSDF-WAC 4. Review the required information to determine if the waste is listed under 20.4.1.200 NMAC (incorporating 40 CFR § 261), Subpart D. Assign all listed hazardous waste numbers, unless the site chooses to justify an alternative assignment and document the justification in the auditable record. 5. Review the required information to determine if the waste exhibits a hazardous characteristic or may contain hazardous constituents included in the toxicity characteristics specified in 20.4.1.200 NMAC (incorporating 40 CFR § 261, Subpart C. If a toxicity characteristic contaminant is identified and is not included as a listed waste, sites may evaluate available data and assign the toxicity characteristic hazardous waste number consistent with RCRA requirements. 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. 6. Review the compiled information to provide an estimate of the material parameter weights for each container to be stored or disposed of at WIPP. For newly generated waste, procedures shall be developed and implemented to characterize hazardous waste using acceptable knowledge prior to packaging. 	<p>S. 4.4 CCP-TP-500, S. 4.4</p>	<p>Y</p> <p>Y</p> <p>Y</p>	<p>AERHDM, CCP-AK-ANLE-500 R6, (AK-1)</p> <p>E2. CCP AK Summary Report for ANL RH Debris Waste, waste stream AERHDM, CCP-AK-ANLE-500 R6, S2.0, 5.4 (AK-1)</p> <p>E3. CCP AK Summary Report for ANL RH Debris Waste, waste stream AERHDM, CCP-AK-ANLE-500 R6, S5.4.2.3, 5.4.4, 5.4.5 (AK-1) AK Att. 6, Waste Form, Waste Material Parameters, Prohibited Items and Packaging for waste stream AERHDM (AK-8) VE BDRS. ANLRHVE11009 (AK-13) RHANLVE100013 (AK-14) RHANLVE100005 (AK-15) RHANLVE090002 (AK-16) RHANLVE060002 (AK-17)</p> <p>E4&E5. CCP AK Summary Report for ANL RH Debris Waste, waste stream AERHDM, CCP-AK-ANLE-500 R6, S5.4.2, tables 4, 5 (AK-1)</p>	<p>Y</p> <p>Y</p> <p>Y</p>	

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		Location	Adequate? Y/N (Why)	Item Reviewed	Adequate? Y/N	
				AK Att. 5, Hazardous Constituents, for waste stream AERHDM (AK-7)		
				E6. CCP AK Summary Report for ANL RH Debris Waste, waste stream AERHDM, CCP-AK-ANLE-500 R6, S5.4.1.2, table 3 (AK-1) Memo attached to AK Att. 6, Waste Form, Waste Material Parameters, Prohibited Items and Packaging for waste stream AERHDM (AK-8)	Y	
149b	F. Sites shall ensure that results of audits of the TRU mixed waste characterization programs at the site are available in the records. G. Sites shall identify all process controls (implemented to ensure that the waste contains no prohibited items and to control hazardous waste content and/or physical form) that have been applied to retrievably stored waste and/or may presently be applied to newly generated waste. Process controls are applied <u>at the time</u> of waste generation/packaging to control waste content, whereas any activities performed <u>after</u> waste generation/packaging to identify prohibited items, hazardous waste content, or physical form are waste characterization activities, not process controls. The AK record must contain specific process control and supporting documentation identifying when these process controls are used to control waste content. See Permit Attachment C, Section C-2 for programmatic requirements related to process controls. (Section C4-3b)	F. CCP-PO-001, S. C4-3f S. C4-3b CCP-QP-021, (All) WP 13-QA.03, (All) G. CCP-TP-005, S. 4.2 - 4.4 Att. 1	Y Y	F. Internal Surveillance (AK-26) G. AK Source Document Summaries for AERHDM, P009, P055, P625, P626 (AK-4)	Y Y	
150	Does the site have implemented procedures which comply with the following criteria to establish acceptable knowledge records: A. Acceptable knowledge information shall be compiled in an auditable record, including a road map for all applicable information. B. The overview of the facility and TRU mixed waste management operations	A-E. CCP-TP-005, S. 1.1, S. 4.2 S. 4.3 S. 4.4 S. 4.10 S. 4.11 Att. 1	A-E. Y	A. CCP AK Summary Report for ANL RH Debris Waste, waste stream AERHDM, CCP-AK-ANLE-500 R6, (AK-1)	Y	

	WAP Requirement ² ANL/CCP Certification Audit, A-11-20, August 2-4, 2011 Table C6-3 Acceptable Knowledge (AK) Checklist	Procedure Documented		Example of Implementation/ Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why)	Item Reviewed	Adequate? Y/N	
	<p>in the context of the facility's mission shall be correlated to specific waste stream information.</p> <p>C. Correlations between waste streams, with regard to time of generation, waste generating processes, and site-specific facilities shall be clearly described. For newly generated wastes, the rate and quantity of waste to be generated shall be defined.</p> <p>D. A reference list shall be provided that identifies documents, databases, Quality Assurance protocols, and other sources of information that support the acceptable knowledge information.</p> <p>E. Container inventories for TRU mixed waste in retrievable storage shall be delineated into waste streams by correlating the container identification to all of the required and additional AK information.</p> <p>(Section C4-3c)</p>	<p>Att. 4 Att. 8 CCP-TP-001, S. 2.7</p>	<p>Y</p> <p>Y</p> <p>Y</p> <p>Y</p>	<p>AK Documentation Checklist, Attachment 1, for waste stream AERHDM (AK-5) Acceptable Knowledge Information List for waste stream AERHDM (AK-6)</p> <p>B. CCP AK Summary Report for ANL RH Debris Waste, waste stream AERHDM, CCP-AK-ANLE-500 R6, S4.1.2, 4.1.3, 4.2.2, 5.3, 5.4 (AK-1)</p> <p>C. CCP AK Summary Report for ANL RH Debris Waste, waste stream AERHDM, CCP-AK-ANLE-500 R6, S4.2.1, 4.2.2, 5.1, 5.2, 5.4 (AK-1)</p> <p>D. Acceptable Knowledge Information List for waste stream AERHDM (AK-6)</p> <p>E. IDC Database screenshots (AK-27) AK Tracking Spreadsheet (AK-28) AK attachment 8 container list (AK-9)</p>	<p>Y</p> <p>Y</p> <p>Y</p> <p>Y</p>	
151	If the generator site submitted an AK Sufficiency Determination Request for a specific waste stream, did the site provide all of the requisite information including	CCP-TP-005, S. 4.7	Y	N/A	N/A	An AK Sufficiency Determination is not being sought for any ANLE waste streams at this time.

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		Location	Adequate? Y/N (Why)	Item Reviewed	Adequate? Y/N	
	the identification of the applicable scenario for which approval is sought? (Section C-0b)					
AUGMENTATION OF ACCEPTABLE KNOWLEDGE						
152	<p>Does the generator site have written procedures for the augmentation of all acceptable knowledge information using sampling and analysis. Sampling and analysis consists of radiography, visual examination, headspace gas, and homogeneous waste sampling and analysis. Do site procedures indicate that the following sampling and analysis will be conducted based upon the results of the Determination Request</p> <p>Any scenario denied - 100% RTR or VE and statistical HSG or solids S&A</p> <p>Scenario 1 Granted -No sampling and analysis radiography/visual examination is required</p> <p>Scenario 2 Granted-Radiography/visual examination is not required but statistical HSG or solids S&A is required</p> <p>Scenario 3 Granted-100% RTR or VE is required, sampling and analysis is not required</p> <p>(Section C4-1, C-0b)</p>	CCP-TP-005, S. 4.4. S. 4.5 S. 4.7 CCP-TP-003, S. 4.0	Y	CCP AK Summary Report for ANL RH Debris Waste, waste stream AERHDM, CCP-AK-ANLE-500 R6, (AK-1) VE. ANLRHVE11009 (AK-13) RHANLVE100013 (AK-14) RHANLVE100005 (AK-15) RHANLVE090002 (AK-16) RHANLVE060002 (AK-17) . ANHSGS100001 (AK-18) ECL10012M (AK-19) ANHSGS100003 (AK-20) ECL10033M (AK-21) ANHSGS090001 (AK-22) ECL09014M (AK-23) HSG Random Container Selection Memo, Lot 1,2, 3, 4 (AK-11) HSG Summary Report Lot 1, 2, 3,4 (AK-12) AK Waste Stream Characterization Checklist , Lot 1, Lot 9, 15, 22 (AK-24)	Y	

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		Location	Adequate? Y/N (Why)	Item Reviewed	Adequate? Y/N	
155	Does the generator site have procedures for reevaluating acceptable knowledge if the results of the waste characterization indicate that the waste to be shipped does not match the approved waste stream or if the data from radiography or visual examination for waste streams without an AK Sufficiency Determination exhibit this discrepancy? Does this procedure describe how the waste is reassigned, acceptable knowledge reevaluation, and appropriate hazardous waste numbers are assigned? (Section C4-3e)	CCP-TP-005, S. 4.8 S. 4.9 Att. 10	Y	NA	NA	There were no examples of discrepancy resolution during characterization and resultant AK reevaluations for this waste stream, <u>AERHDM</u> .
156	Do site procedures indicate that debris wastes are assigned toxicity characteristic EPA numbers based on AK regardless of the quantity or concentration? (C4-3e)	CCP-TP-005, S. 4.4.17 Att. 5	Y	CCP AK Summary CCP-AK-ANLE-500, R6 S5.4.2.2, tables 4 and 5 (AK-1) AK att. 5 Hazardous Constituents for waste stream AERHDM (AK-7)	Y	
CRITERIA FOR ASSEMBLING AN ACCEPTABLE KNOWLEDGE RECORD DELINEATING THE WASTE STREAM						
158	If wastes are reassigned to a different waste matrix code based on site visual examination or radiography or Permittee confirmation activities, does the generator site have written documentation to ensure that the following steps are followed: A. Review existing information based on the container identification number and document all differences in hazardous waste number assignments B. If differences exist in the hazardous waste numbers that were assigned, reassess and document all required acceptable knowledge information (Section C3-b) associated with the new designation C. Reassess and document all sampling and analytical data associated with the waste D. Verify and document that the reassigned waste matrix code was generated within the specified time period, area and buildings, waste generating process, and that the process material inputs are consistent with the waste material parameters identified during radiography or visual examination E. Record all changes to acceptable knowledge records F. If discrepancies exist in the acceptable knowledge information for the revised waste matrix code, document the segregation of the affected portion of the waste stream, and define the actions necessary to fully characterize the waste (Section C4-3e)	CCP-TP-005, S. 4.8 S. 4.9 Att. 10	Y	NA	NA	There were no examples of discrepancy resolution during characterization and resultant AK reevaluations for this waste stream, <u>AERHDM</u> .
161	Do site procedures ensure that headspace gas and solid/soil analytical data are used to resolve AK assignments for hazardous waste, as necessary? If a constituent is detected in headspace gas that the site believes isn't from the waste process, the	CCP-TP-005, S. 4.5 S. 4.8	Y	ANHSGS100001 (AK-18) ECL10012M	Y	

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		Location	Adequate? Y/N (Why)	Item Reviewed	Adequate? Y/N	
	site must provide documentation to support any determination that organic constituents are associated with packaging materials, radiolysis, or other uses not consistent with solvent use. If the source of the detected headspace gas solvents cannot be identified, the appropriate F listing will be assigned. If a constituent in a listed waste is present in solid/soil analytical results, the appropriate listed waste shall be added to the waste stream. F-listed waste assigned by acceptable knowledge shall not be removed based on headspace gas or solids analysis. In the case of totals/TCLP analysis, do procedures reflect the allowance for concentration assessments, wherein sites may add or remove total/TCLP and non-toxic F003 constituents found in headspace and solid/soil analyses? (Section C4-3e)	S. 4.9 CCP-TP-003, S. 4.0		(AK-19) ANHSGS100003 (AK-20) ECL10033M (AK-21) ANHSGS090001 (AK-22) ECL09014M (AK-23) HSG Summary Reports Lot 1, 2, 3, 4 (AK-12)		
162	If sampling and analysis conducted to augment AK determines that a hazardous constituent as identified in headspace gas sampling or soil/homogeneous waste sampling is present in the waste, does the generator site indicate that they will: 1) assign the hazardous waste number to the entire waste stream as applicable, or 2) segregate drums containing detectable concentrations of solvent into a separate waste stream, and assign applicable hazardous waste numbers? (Section C4-3e)	CCP-TP-005, S. 4.5 S. 4.8 S. 4.9 CCP-TP-003, S. 4.0	Y	ANHSGS100001 (AK-18) ECL10012M (AK-19) ANHSGS100003 (AK-20) ECL10033M (AK-21) ANHSGS090001 (AK-22) ECL09014M (AK-23) HSG Summary Reports Lot 1, 2, 3, 4 (AK-12)	Y	
163	Does the generator site document, justify, and consistently delineate waste streams and assign hazardous waste numbers based on site specific permit requirements or state-enforced agreements? (Section C4-3e)	CCP-TP-005, S. 4.4 S. 4.5 Att. 1	Y	NA	NA	There are no applicable State hazardous waste codes for Illinois
164	Does the generator site have written methodologies for determining the mean concentration of solvent VOCs detected by either headspace gas analysis or homogeneous waste sampling for each waste stream or waste stream lot, and are all data ("U" flags designated as one half the MDL and "J" flags, which are less than the PRQL but greater than the MDL)? (Section C4-3e)	CCP-TP-003, Att. 3 Att. 4	Y	ANHSGS100003 ECL10033G ECL10033M (GEN-2) CP:08:00374 – Transmittal of Waste Stream Profile Form, Attachment 2, for Remote Handled Waste Stream AERHDM at the Argonne National Laboratory with Characterization Information Summary CP:08:00375 -	Y	

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		Location	Adequate? Y/N (Why)	Item Reviewed	Adequate? Y/N	
				Transmittal of Waste Stream Profile Form, Attachment 4, for Remote Handled Waste Stream AERHDM at the Argonne National Laboratory (GEN-3)		
165	Do procedures ensure that spent solvent assignments are made by using the UCL ₉₀ (of mean concentration), and comparing this with the PRQLs? If the UCL ₉₀ exceeds the PRQL, is acceptable knowledge reevaluated and determine potential source of the constituent? (Section C4-3e)	CCP-TP-005, S. 4.5 S. 4.8 S. 4.9 CCP-TP-003, S. 4.0	Y	ANHSGS100001 (AK-18) ECL10012M (AK-19) ANHSGS100003 (AK-20) ECL10033M (AK-21) ANHSGS090001 (AK-22) ECL09014M (AK-23) HSG Summary Reports Lot 1, 2, 3, 4 (AK-12)	Y	
167	Does the site have written procedures for situations where concentrations of some VOCs are orders of magnitude higher than other target analytes? In these cases, elevated MDLs may be generated, and those constituents with an elevated MDL but "U" designation will not be used in mean calculations. (Section C4-3e)	CCP-TP-003, S. 4.2	Y	ANHSGS100003 ECL10033G ECL10033M (GEN-2) CP:08:00374 – Transmittal of Waste Stream Profile Form, Attachment 2, for Remote Handled Waste Stream AERHDM at the Argonne National Laboratory with Characterization Information Summary CP:08:00375 - Transmittal of Waste Stream Profile Form, Attachment 4, for Remote Handled Waste Stream AERHDM at the Argonne National Laboratory (GEN-3)	Y	Headspace Gas: NA – This is a function completed at Project Level.

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		Location	Adequate? Y/N (Why)	Item Reviewed	Adequate? Y/N	
DATA QUALITY REQUIREMENTS						
168	<p>Are acceptable knowledge processes consistently applied among all generator sites, and does each generator site comply with the following data quality requirements for acceptable knowledge documentation:</p> <p>A. Precision - Precision is the agreement among a set of replicate measurements without assumption of the knowledge of a true value. The qualitative determinations, such as compiling and assessing acceptable knowledge documentation, do not lend themselves to statistical evaluations of precision. However, the acceptable knowledge information will be addressed by the independent review of acceptable knowledge information during internal and external audits.</p> <p>B. Accuracy - Accuracy is the degree of agreement between an observed sample result and the true value. The percentage of waste containers which require reassignment to a new waste matrix code and/or designation of different hazardous waste numbers based on sampling and analysis data and discrepancies identified by the Permittees during waste confirmation will be reported as a measure of acceptable knowledge accuracy.</p> <p>C. Completeness - Completeness is an assessment of the number of waste streams or number of samples collected to the number of samples determined to be useable through the data validation process. The acceptable knowledge record must contain 100 percent of the information (Permit Attachment C4-3) The usability of the acceptable knowledge information will be assessed for completeness during audits.</p> <p>D. Comparability - Data are considered comparable when one set of data can be compared to another set of data. Comparability is ensured through sites meeting the training requirements and complying with the minimum standards outlined for procedures that are used to implement the acceptable knowledge process. All sites must assign hazardous waste numbers in accordance with Permit Attachment C4-4 and provide this information regarding its waste to other sites who store or generate a similar waste stream.</p> <p>E. Representativeness - Representativeness expresses the degree to which sample data accurately and precisely represent characteristics of a population. Representativeness is a qualitative parameter that will be satisfied by ensuring that the process of obtaining, evaluating, and documenting acceptable knowledge information is performed in accordance with the minimum standards established in Permit Attachment C4. Sites also</p>	<p>A. CCP-PO-001, S. C4-3f CCP-QP-021, (All) WP 13-QA.03, (All)</p> <p>B. CCP-TP-005, S. 4.6</p> <p>C. CCP-TP-005, S. 4.0</p> <p>D. CCP-TP-005, S. 2.2 S. 4.4 CCP-QP-002, S. 4.2.1</p> <p>E. CCP-TP-005, S. 2.2 S. 4.0 CCP-QP-002, S. 4.2.1</p>	<p>Y</p> <p>Y</p> <p>Y</p> <p>Y</p> <p>Y</p>	<p>A: Internal Surveillance (AK-26)</p> <p>B: AK Accuracy Report (AK-25)</p> <p>C: AK Documentation Checklist, Attachment 1, for waste stream AERHDM (AK-5)</p> <p>D: Acceptable Knowledge Expert (AKE) and Site Project Manager (SPM) Training files (GEN-14)</p> <p>E: Acceptable Knowledge Expert (AKE) and Site Project Manager (SPM) Training files (GEN-14) AK Source Document</p>	<p>Y</p> <p>Y</p> <p>Y</p> <p>Y</p> <p>Y</p>	

	WAP Requirement ² ANL/CCP Certification Audit, A-11-20, August 2-4, 2011 Table C6-3 Acceptable Knowledge (AK) Checklist	Procedure Documented		Example of Implementation/ Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why)	Item Reviewed	Adequate? Y/N	
	must assess and document the limitations of the acceptable knowledge information used to assign hazardous waste numbers (e.g., purpose and scope of information, date of publication, type and extent to which waste parameters are addressed). (Section C3-9)			Summaries for waste stream AERHDM (AK-4)		
169	Does the generator site address quality control by tracking its performance with regard to the use of acceptable knowledge by: 1) assessing the frequency of inconsistencies among information, and 2) documenting the results of waste discrepancies identified by the generator/storage site during waste characterization or the Permittees during waste confirmation using radiography, review of radiography audio/video recordings, or visual examination, or review of visual examination records. In addition, the acceptable knowledge process and waste stream documentation must be evaluated through internal assessments by generator/storage site quality assurance organizations. (Section C4-3e)	CCP-TP-005, S. 4.6 S. 4.9 CCP-QP-021, (All) WP 13-QA.03, (All) CCP-PO-001, S. C4-3f	Y	Internal Surveillance (AK-26) AK Accuracy Report (AK-25) AK Discrepancy Resolutions (AK-10)	Y	

1. NMED expects a traceability analysis to be performed, the results of which should be presented on this checklist under the "Examples of Implementation" column. Further, the traceability analysis process and results should be discussed in the Final Audit Report.
2. The WAP requirements should be presented in documents, such as procedures. Each of the questions posed under WAP requirements are meant to determine whether procedures are in place or whether documents are evident which demonstrate that the specific WAP requirement is or can be met.

Appendix F
Redlined A-11-20 C6-4 Checklist

**Table C6-4 Headspace Gas Checklist
ANL/CCP Certification Audit, A-11-20, August 2-4, 2011**

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Headspace Gas Checklist

	WAP Requirement ¹ ANL/CCP Certification Audit, A-11-20, August 2-4, 2011 Table C6-4 Headspace Gas Checklist	Procedure Documented		Example of Implementation/ Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N(Why?)	Item Reviewed	Adequate? Y/N	
HEADSPACE GAS SAMPLING FREQUENCY						
182	Are procedures in place to ensure that randomly selected retrievably stored and newly generated waste containers will undergo headspace gas sampling and analysis as required to augment AK? (Section C-3a)	CCP-TP-162, (All)	Y	CP:06:01623 – Headspace Gas Random Sample Selection Memorandum for Waste Stream AERHDM Lot 1, Being Characterized by the Central Characterization Project at the Argonne National Laboratory CP:07:01119 – Headspace Gas Random Sample Selection Memorandum for Waste Stream AERHDM Lot 2, Being Characterized by the Central Characterization Project at the Argonne National Laboratory CP:08:00407 – Revised Headspace Gas Random Sample Selection Memorandum for Waste Stream AERHDM Lot 2, Being Characterized by the Central Characterization Project at the Argonne National Laboratory CP:08:00412 - Revised Headspace Gas Random Sample Selection Memorandum for Waste Stream AERHDM Lot 2, Being Characterized by the Central Characterization Project at the Argonne National Laboratory CP:08:00442 - Revised	Y	Headspace Gas: NA – This function is completed at the Project Level.

	WAP Requirement ¹ ANL/CCP Certification Audit, A-11-20, August 2-4, 2011 Table C6-4 Headspace Gas Checklist	Procedure Documented		Example of Implementation/ Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N(Why?)	Item Reviewed	Adequate? Y/N	
				Headspace Gas Random Sample Selection Memorandum for Waste Stream AERHDM Lot 2, Being Characterized by the Central Characterization Project at the Argonne National Laboratory CP:09:01411 – Subsequent Headspace Gas Random Sample Selection Memorandum for Waste Stream AERHDM Lot 3, Being Characterized by the Central Characterization Project at the Argonne National Laboratory CP:10:01504 - Subsequent Headspace Gas Random Sample Selection Memorandum for Waste Stream AERHDM Lot 4, Being Characterized by the Central Characterization Project at the Argonne National Laboratory (GEN-4)		
183	Are procedures in place to ensure that randomly selected containers will be allowed to equilibrate to sampling room temperature for 72 hours prior to sampling (18° C or higher) and that the drum ages specified in accordance with Section C1-1a(1) are met? All information necessary to determine drum age criteria must be determined, including but not limited to: <ul style="list-style-type: none"> • Scenario Determination • Packaging Configuration • Filter Diffusivity • Liner/Lid Opening Diameter (Section C1-1a)	CCP-TP-093, S. 4.3	Y	ANHSGS100003 (HSG-1)	Y	

	WAP Requirement ¹ ANL/CCP Certification Audit, A-11-20, August 2-4, 2011 Table C6-4 Headspace Gas Checklist	Procedure Documented		Example of Implementation/ Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N(Why?)	Item Reviewed	Adequate? Y/N	
HEADSPACE GAS SAMPLING GENERAL REQUIREMENTS						
184	Are procedures in place to ensure all containers of waste are vented through filters to ensure that gases are adequately vented preventing over pressurization or development of conditions that would lead to the development of ignitable, corrosive, reactive, or other characteristic waste? (Section C-1c)	CCP-TP-093, S. 4.2 S. 4.3	Y	ANHSGS100003 (HSG-1)	Y	
186	Are procedures in place to ensure that the following gas sample container and holding time requirements are met: <ul style="list-style-type: none"> The minimum sample volume for VOC. sample collection is 250 mL. (Note: a single 100 mL sample may be collected if the headspace is limited) Holding temperatures shall be between 0° C and 40° C (Table C1-1)	CCP-TP-093, Att. 1 Att. 2	Y	ANHSGS100003 (HSG-1)	Y	
187	Are procedures in place to ensure that all sampling is performed in an appropriate radiation containment area? (Section C1-1a)	CCP-TP-093, S. 2.4 S. 2.5	Y	ANHSGS100003 (HSG-1)	Y	
188	Are procedures in place to ensure that headspace gases are analyzed for the analytes listed in Table C3-2 of the Attachment C3? (Section C1-1a(1))	NA	NA	NA	NA	This is evaluated during the laboratory audit.
189	Are procedures in place to ensure that all headspace gas analyses utilize either SUMMA® or equivalent canisters or on-line integrated sampling/analysis systems? (Section C1-1a(1))	CCP-TP-093, S. 2.3	Y	ANHSGS100003 (HSG-1)	Y	
MANIFOLD SAMPLING						
190	Are procedures, processes, and equipment in place to ensure that the following sampling procedures are implemented: <ul style="list-style-type: none"> The sampling equipment is leak checked and cleaned upon first use and as needed The manifold and sample canisters are evacuated to 0.1 mm Hg prior to sample collection Cleaned and evacuated sample canisters are attached to the evacuated manifold before the manifold inlet valve is opened The manifold inlet valve is attached to a changeable filter connected to either a side port needle sampling head capable of forming an airtight seal (for penetrating a filter or rigid poly liner when necessary), a drum 	NA	NA	NA	NA	Manifold Sampling is not used by ANL/CCP.

	WAP Requirement ¹ ANL/CCP Certification Audit, A-11-20, August 2-4, 2011 Table C6-4 Headspace Gas Checklist	Procedure Documented		Example of Implementation/ Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N(Why?)	Item Reviewed	Adequate? Y/N	
	<p>punch sampling head capable of forming an airtight seal (capable of punching through the metal lid of a drum while maintaining an airtight seal for sampling through the drum lid), or a sampling head with an airtight fitting for sampling through a pipe overpack container filter vent hole. Refer to Section C1-1a(4) for descriptions of these sampling heads.</p> <ul style="list-style-type: none"> Field blanks are collected using samples of room air collected in the sampling area in the immediate vicinity of the waste container. <i>(Note: field blanks for SUMMA® canisters are collected directly into the canister without the use of the manifold.)</i> Manifold equipped with purge assembly that allows QC samples to be collected through all sampling components that affect compliance with QAOs The manifold internal volume is calculated and documented in a field logbook The total volume of headspace gas collected is calculated by adding the canister volume and internal manifold volume and should be less than 10 percent of the available headspace volume when a volume estimate is available <p>(Section C1-1a(2))</p>					
191	<p>Are procedures, processes, and equipment in place to ensure that the following manifold sample side conditions are met:</p> <ul style="list-style-type: none"> The sampling head forms a leak-tight connection with the sampling manifold A flexible hose allowing movement from the purge assembly to the waste container Pressure sensors that are pneumatically connected to the manifold and must be able to measure absolute pressure from 0.05 mm Hg to 1000 mm Hg with a resolution of that must be 0.01 mm Hg at 0.05 mm of Hg. The pressure sensors shall have an operating range of 15° C to 40° C. Sufficient canister ports shall be available to allow simultaneous collection of headspace gas samples and duplicates for VOC analysis. Ports not occupied with sample canisters require a plug to prevent ambient air from entering the system Ports shall have VCR® fittings for connection to the sample canisters to prevent degradation of the fitting on the canister and manifold. Sample canisters are leak-free, stainless steel pressure vessels, with a Cr-NiO SUMMA® passivated interior surface or canisters with 	NA	NA	NA	NA	Manifold Sampling is not used by ANL/CCP.

	WAP Requirement ¹ ANL/CCP Certification Audit, A-11-20, August 2-4, 2011 Table C6-4 Headspace Gas Checklist	Procedure Documented		Example of Implementation/ Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N(Why?)	Item Reviewed	Adequate? Y/N	
	<p>equivalently inert surfaces, bellows valve, and a pressure/vacuum gauge. All canisters shall have VCR " fittings to sampling and analytical equipment</p> <ul style="list-style-type: none"> The pressure/vacuum gauge must be mounted on each manifold and shall be helium-leak tested to 1.5×10^{-7} cc/s, have all stainless steel construction, and be capable of operating at temperatures to 125° C 					
191a	<ul style="list-style-type: none"> A dry vacuum pump capable of reducing the manifold pressure to 0.05 mm Hg. (Note: If an oil vacuum pump is used precautions such as a molecular sieve or cryogenic trap shall be used to prevent diffusion of oil vapors back into the manifold) A minimum distance between the needle and the valve that isolates the pump from the manifold in order to minimize the dead volume in the manifold. If real time equipment blanks are not available, the manifold shall be equipped with an OVA capable of detecting all analytes listed in Table C3-2 and is capable of measuring total VOC concentrations below the lowest headspace gas PRQL <p>(Section C1-1a(2))</p>	NA	NA	NA	NA	Manifold Sampling is not used by ANL/CCP.
192	<p>Are procedures, processes, and equipment in place to ensure that the following manifold standard side conditions are met:</p> <ul style="list-style-type: none"> A cylinder of compressed zero air, helium, argon, or nitrogen that is hydrocarbon and CO₂ free air (only hydrocarbon and CO₂-free gases required for FTIRS) and certified by the manufacturer to contain less than one ppm VOCs. The gas is used to clean the manifold between samples and to provide gas for the collection of equipment and on-line blanks <p><i>(Note: a zero air or nitrogen generator may be used, provided a sample of air is collected and found to contain less than 1 ppm total VOCs and the air is humidified)</i></p> <ul style="list-style-type: none"> Cylinders of reference gas with known concentrations of analytes from Table C3-2 certified by the manufacturer to provide gases for evaluating the accuracy of the headspace gas sampling process All cylinders of reference gases and zero air shall be connected to flow regulating devices A humidifier filled with ASTM Type I or II water, connected, and opened to the standard side of the manifold between the compressed gas cylinders and the purge assembly shall be used, if the Fourier Transform Infrared System (FTIRS) is not used. No humidifier if the FTIRS is used <i>(Note: Compressed gas may include water vapor between 1000 and 10000</i> 	NA	NA	NA	NA	Manifold Sampling is not used by ANL/CCP.

	WAP Requirement ¹ ANL/CCP Certification Audit, A-11-20, August 2-4, 2011 Table C6-4 Headspace Gas Checklist	Procedure Documented		Example of Implementation/ Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N(Why?)	Item Reviewed	Adequate? Y/N	
	<i>ppmv in lieu of a humidifier</i> <ul style="list-style-type: none"> The humidifier is off-line during system evacuation to prevent manifold flooding 					
192a	<ul style="list-style-type: none"> A purge assembly that allows the sampling head to be connected to the standard side of the manifold. A flow indicating device or pressure regulator that is connected downstream of the purge assembly to monitor the flow rate or pressure of gases through the purge assembly to ensure that excess flow is available to prevent ambient air from contaminating the QC samples and allow sample of gas from the compress gas cylinders to be collected near ambient pressure. (Section C1-1a(2))	NA	NA	NA	NA	Manifold Sampling is not used by ANL/CCP.
193	Do procedures ensure that NIST Certified (or equivalent) ambient pressure sensors maintained in the sampling area must have a sufficient measurement range for the expected ambient barometric pressures and a resolution shall be 1.0 mm Hg or less? (Section C1-1a(2))	NA	NA	NA	NA	Manifold Sampling is not used by ANL/CCP.
194	Do procedures ensure that the NIST traceable (or equivalent) temperature sensor in the sampling location shall have a sufficient measurement range for the ambient temperatures (18 to 50°C)? (Section C1-1a(2))	CCP-TP-093, Att. 1	Y	ANHSGS100003 (HSG-1)	Y	
DIRECT CANISTER SAMPLING						
195	Are procedures, processes, and equipment in place to ensure that the following operating conditions are in place for direct canister sampling: <ul style="list-style-type: none"> Canisters are evacuated to 0.1 mm Hg prior to use and attached to a changeable filter connected to the sampling head Sampling heads are capable of either punching through the metal lid of the drums while maintaining an airtight seal for sampling through the drum lid, penetrating a filter or the septum in the orifice of a self-tapping screw, or maintaining an airtight seal for sampling through a pipe overpack container filter vent hole. Field duplicates are collected in the same manner and at the same time and using the same type of sampling apparatus as used for headspace gas sample collection. Field blanks shall be samples of room air collected in the immediate vicinity of the waste drum sampling area prior to removal of the drum lid. Equipment blanks and field reference standards shall be collected using a 	CCP-TP-093, (All)	Y	ANHSGS100003 (HSG-1)	Y	

	WAP Requirement ¹ ANL/CCP Certification Audit, A-11-20, August 2-4, 2011 Table C6-4 Headspace Gas Checklist	Procedure Documented		Example of Implementation/ Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N(Why?)	Item Reviewed	Adequate? Y/N	
	purge assembly equivalent to the standard side of the manifold <ul style="list-style-type: none"> Less than 10 percent of the headspace is withdrawn when a headspace estimate is available <i>(Note: The total volume withdrawn is can be determined by adding the canister volume and the internal volume of the sampling head)</i> <ul style="list-style-type: none"> Each sample canister is shall be equipped with a pressure/vacuum gauge capable of indicating leaks and sample collection volumes. The gauge shall be helium leak tested to 1.5×10^{-7} cc/s, have all stainless steel construction and be capable of tolerating temperatures to 125° C Summa® canisters or equivalent are used to collect samples (Section C1-1a(3))					
SAMPLING HEADS UNDER DRUM LIDS: SAMPLING THROUGH A CARBON FILTER						
196	Are procedures, process, and equipment adequate to ensure that samples collected through a filter meet the following requirements: <ul style="list-style-type: none"> The lid of the drum's 90-mil rigid poly liner shall contain a hole for venting to the drum That non-vented drums are not sampled until an internal nonconformance report is prepared, submitted, and resolved in order to obtain a representative sample The filter shall be sealed to prevent outside air from entering the drum The sampling head for collecting drum headspace gas shall consist of a side-port needle, a filter to prevent particle contamination of the sample, and an adapter to connect the side-port needle to the filter The sampling head is cleaned or replaced after each use The housing of the filter shall allow insertion of the sampling needle through the filter element or a sampling port with septum that bypasses the filter element into the drum headspace The side port needle shall be used to reduce the potential for plugging The purge assembly shall be modified for compatibility with the side port needle. (Section C1-1a(4)(i))	CCP-TP-093, (All)	Y	ANHSGS100003 (HSG-1)	Y	

	WAP Requirement ¹ ANL/CCP Certification Audit, A-11-20, August 2-4, 2011 Table C6-4 Headspace Gas Checklist	Procedure Documented		Example of Implementation/ Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N(Why?)	Item Reviewed	Adequate? Y/N	
SAMPLING HEADS UNDER DRUM LIDS: SAMPLING THROUGH THE DRUM LID						
197	Are procedures in place to establish the criteria for sampling through the drum lid as opposed to sampling through a filter? (Section C1-1a(4)(ii))	NA	NA	NA	NA	ANL/CCP samples through a filter.
197a	If sampling through a pipe overpack container filter vent hole with an airtight device is used, are procedures in place to ensure that a sampling head with an airtight seal for sampling through a pipe overpack container filter vent hole are available? (Section C1-1a(4)(iii))	NA	NA	NA	NA	ANL/CCP samples through a filter.
197b	If sampling through a pipe overpack container filter vent hole is used, are the following criteria met: <ul style="list-style-type: none"> • The seal between the pipe overpack container surface and sampling apparatus shall be designed to minimize intrusion of ambient air. • The filter shall be replaced as quickly as is practicable with the airtight sampling apparatus to ensure that a representative sample can be taken. • All components of the sampling system that come into contact with sample gases shall be cleaned according to requirements for direct canister sampling or manifold sampling, whichever is appropriate, prior to sample collection. • Equipment blanks and field reference standards shall be collected through all the components of the sampling system that contact the headspace-gas sample. • During sampling, openings in the pipe overpack container shall be sealed to prevent outside air from entering the container. • A flow-indicating device shall be connected to sampling system and operated according to the direct canister or manifold sampling requirements, as appropriate. (Section C1-1a(4)(iii))	NA	NA	NA	NA	ANL/CCP does not sample through a pipe overpack.
197c	If sampling through a pipe overpack container filter vent hole is used, are the following criteria met? <ul style="list-style-type: none"> • The site has documentation that demonstrates that they have determined through testing the appropriate length of time for exchanging the filter with the sampling device to assure representative samples are collected. (Section C1-1a(4)(iii))	NA	NA	NA	NA	ANL/CCP does not sample through a pipe overpack.
198	Are procedures, process, and equipment adequate to ensure that samples collected through the drum lid by punching meet the following requirements:	NA	NA	NA	NA	ANL/CCP does not does not utilize packing mechanisms.

	WAP Requirement ¹ ANL/CCP Certification Audit, A-11-20, August 2-4, 2011 Table C6-4 Headspace Gas Checklist	Procedure Documented		Example of Implementation/ Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N(Why?)	Item Reviewed	Adequate? Y/N	
	<ul style="list-style-type: none"> The lid of the drum's 90-mil rigid poly liner shall contain a hole for venting to the drum. If the DAC for Scenario 1 is met, a sample may be collected from inside the 90-mil rigid poly liner. If headspace gas samples are collected from the drum headspace prior to venting the 90-mil rigid poly liner, the sample is not acceptable and a nonconformance report shall be prepared, submitted, and resolved. The drum lid shall be breached using a punch that forms an airtight seal between the drum lid and the manifold or canister The seal between the drum lid and the sampling head shall be designed to minimize the intrusion of ambient air All components of the sampling system that come in contact with sample gases shall be purged with humidified zero air, nitrogen, or helium prior to sample collection Equipment blanks and field reference standards shall be collected through all components of the punch that contact the headspace gas sample Pressure shall be applied to the punch until the drum lid has been breached Provisions shall be made to relieve excessive drum pressure increases during drum punch operations; potential pressure increases may occur during sealing of the drum punch to the drum lid The filter is sealed to prevent outside air from entering the drum (Section C1-1a(4)(ii))					
198a	<ul style="list-style-type: none"> A flow indicating device or pressure regulator to verify flow of gases shall be pneumatically connected to the drum punch and operated in the same manner as the flow indicating device Equipment are used to secure the drum punch sampling system to the drum lid If the headspace gas sample is not taken at the time of drum punching, the presence and diameter of the rigid liner vent hole is documented during the punching operation for use in determining an appropriate Scenario 2 DAC. (Section C1-1a(4)(ii))	NA	NA	NA	NA	ANL/CCP does not does not utilize packing mechanisms.
QUALITY CONTROL SAMPLE COLLECTION						
199	Are procedures in place to ensure that the following QC sample requirements are					

	WAP Requirement ¹ ANL/CCP Certification Audit, A-11-20, August 2-4, 2011 Table C6-4 Headspace Gas Checklist	Procedure Documented		Example of Implementation/ Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N(Why?)	Item Reviewed	Adequate? Y/N	
	met: <ul style="list-style-type: none"> Field QC samples are collected on per sample batch basis for manifold and direct canister sampling. A sampling batch is defined as up to 20 samples collected within 14 days of the first sample Field samples are collected and analyzed on a per on-line batch basis for on-line sampling/analysis systems. An on-line batch is defined as the number of headspace gas samples that are collected within a 12 hour period from the same on-line integrated analysis system For the manifold sampling method, field blanks, equipment blanks, field duplicates, and field reference samples are collected prior to sample collection on a per sampling batch basis or one per day, whichever is more frequent For the direct canister sampling method field blanks and field duplicates are collected on a per sampling batch basis prior to sample collection; while equipment blanks and field reference samples are collected after equipment purchase, cleaning, and assembly 	CCP-TP-093, S. 2.6.4 NA NA CCP-TP-093, S. 2.6.1 S. 2.6.2	Y	ANHSGS100003 (HSG-1)	Y	2 nd Bullet: NA - ANL/CCP does not use on-line sampling 3 rd Bullet: NA - ANL/CCP does not use manifold sampling methods.
199a	<ul style="list-style-type: none"> For the On-line sampling method, field blanks, equipment blanks, field duplicates, and field reference samples are collected on a per on-line batch basis. <i>(Note: The on-line blank replaces the laboratory and equipment blanks, the on-line duplicate replaces the field duplicate and the laboratory duplicate, and the on-line sample control replace the field reference standard and the laboratory control sample.)</i> (Section C1-1b, C1-1b(1), C1-1b(2), C1-1b(3), C1-1b(4))	NA	NA	NA	NA	ANL/CCP does not use on-line sampling.
200	Do procedures adequately assign the Site Project QA Officer with the responsibility of monitoring field QC results and initiate the nonconformance report process in the event the following acceptance criteria are not met or sample collection frequencies are not met: <ul style="list-style-type: none"> Field and equipment blanks shall be less than 3 times the detection limits specified in Table C3-2 and equipment blank results determined by FTIR shall be less than the PRQL specified in Table C3-2 (Section C1-1b(1) and C1-1b(2)) Field reference standards shall have a recovery of between 70 and 130% (Table C1-3) Field Duplicates shall have an RPD of less than or equal to 25 (C1-1b(4); Table C1-3)	CCP-TP-001, Att. 10	Y	ANHSGS100003 ECL10033G ECL10033M (GEN-2) CP:08:00377 – Report of Field Reference Standard Results for the Central Characterization Project – Argonne National Laboratory (GEN-6)	Y	
201	Are procedures in place to ensure that field reference standards meet the following criteria: <ul style="list-style-type: none"> Field reference standards shall contain a minimum of 6 analytes listed in 	CCP-TP-093, S. 2.6.3	Y	ANHSGS100003 (HSG-1)	Y	

	WAP Requirement ¹ ANL/CCP Certification Audit, A-11-20, August 2-4, 2011 Table C6-4 Headspace Gas Checklist	Procedure Documented		Example of Implementation/ Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N(Why?)	Item Reviewed	Adequate? Y/N	
	<p>Table C3-2 at a range of between 10 and 100 ppmv and at concentrations greater than the MDL</p> <ul style="list-style-type: none"> Field reference standards shall be traceable to a nationally recognized standard, if available If commercial gases are used, they shall be accompanied by a Certificate of Analysis and all field reference standards are traceable to certificates. Commercial gases are not used past the manufacturer specified shelf life. Field reference samples are submitted blind to the laboratory at a frequency of one per sampling batch. (Note: Field reference standards may be discontinued for direct canister method if QAO accuracy objectives are met) <p>(Section C1-1b(3))</p>					
202	<p>Are procedures in place to ensure that field duplicate samples are collected sequentially and in accordance with Table C1-1?</p> <p>(Section C1-1b(4))</p>	CCP-TP-093, S. 2.6.2 S. 4.5.4	Y	ANHSGS100003 (HSG-1)	Y	
SAMPLE EQUIPMENT TESTING, INSPECTION AND MAINTENANCE						
203	<p>Are procedures in place to ensure that sample containers are cleaned in accordance with the following specifications:</p> <ul style="list-style-type: none"> All sampling components that contact sample gases are constructed of inert materials such as stainless steel or Teflon" The sampling manifold and canisters are properly cleaned and leak checked prior to each sampling event in accordance to or equivalent with TO-14A or TO-15 methodology SUMMA® canisters or equivalent are cleaned on an equipment cleaning batch basis. An equipment cleaning batch is defined as the number of canisters that can be cleaned together at one time using the same cleaning method The cleaning system consists of an optional oven and a vacuum manifold which uses a dry vacuum pump or a cryogenic trap backed by an oil sealed pump Prior to cleaning a 24 hour leak check shall be performed (+/- 2 psig) on all canisters Canisters that shall be checked for leaks, repaired, and reprocessed One canister per equipment cleaning batch is filled with humid zero air or 	NA	NA	NA	NA	Sample cleaning is done by the INL facility and is audited separately.

	WAP Requirement ¹ ANL/CCP Certification Audit, A-11-20, August 2-4, 2011 Table C6-4 Headspace Gas Checklist	Procedure Documented		Example of Implementation/ Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N(Why?)	Item Reviewed	Adequate? Y/N	
	humid high purity nitrogen and analyzed for VOCs <ul style="list-style-type: none"> A batch is considered clean if VOC concentrations are less than 3 times the MDLs specified in Table C3-2 Certified leak-free canisters are evacuated to 0.1 mm Hg or less for storage Canister cleaning certification documentation is available at the cleaning facility and the cleaning facility initiates canister tags. (Section C1-1c, C1-1c(1))					
204	Are procedures in place to ensure that manifold pressure sensors and ambient air temperature sensors are certified prior to initial use and annually using NIST traceable standards? In addition OVAs if used shall be calibrated daily using known calibration gases and the balance of the OVA calibration is consistent with the manifold purge gas? (Section C1-1d)	NA	NA	NA	NA	ANL/CCP does not perform laboratory analysis.
205	Are procedures in place to ensure that sampling equipment are cleaned and leak checked using the following specifications: <ul style="list-style-type: none"> Surfaces of all sampling equipment that will come in contact with sample gases are thoroughly inspected and cleaned prior to assembly Manifolds and sampling heads shall be purged with humidified zero air, nitrogen, or helium and leak checked after assembly The cleaning shall be repeated if routine system cleaning is inadequate Manifolds and sampling heads which are reused shall be cleaned and leak checked according to procedures in the EPA's Compendium Method TO-14A or TO-15 after sample collection, field duplicate collection, field blank collection, and after the additional cleaning require for field reference samples. All manifold ports shall be capped or closed with valves (sample canisters may be attached as well) Manifolds are cleaned by heating the sample side of the manifold to 150 °C and periodically evacuated and flushed with humidified zero air, nitrogen, or helium Manifolds not in use are demonstrated as clean before storage with a positive pressure of humidified zero air, nitrogen, or helium gas in the sampling and standard sides Sampling is suspended when the analysis of an equipment blank indicated the if VOC limits have been exceeded or if a leak test fails Sampling systems are cleaned after field reference standard collection by 	NA	NA	NA	NA	ANL/CCP performs SUMMA® sample collection only.

	WAP Requirement ¹ ANL/CCP Certification Audit, A-11-20, August 2-4, 2011 Table C6-4 Headspace Gas Checklist	Procedure Documented		Example of Implementation/ Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N(Why?)	Item Reviewed	Adequate? Y/N	
	installing a gas tight connector in place of the sampling head, between the flexible hose and purge assembly. This allows the sample and standard side to be flushed with humidified zero air, nitrogen, or helium in conjunction with heated pneumatic lines <ul style="list-style-type: none"> • Needles, airtight fitting or seal, adapters, and filters are cleaned in accordance with the EPA Method TO-14A or TO-15 procedures. Sample heads shall be discarded or cleaned according to Method TO-15. In addition, the needle, the airtight fitting and seal, and the filter should be purged with zero air, nitrogen, or helium and capped for storage (Section C1-1c(2) , Section C1-1c(3), Section C1-1c(4), and Section C1-c(5))					
SAMPLE HANDLING AND CUSTODY						
207	Do formats for field logs and custody records specify documentation of the following information: <ul style="list-style-type: none"> • Name of sampling facility • Waste container identification number • Sample identification number of each sample referenced to waste container • Sample matrix • Time and date of sample collection • Type/number and size of sample container(s) • Method of sample preservation • Requested analyses • Sampler(s) name through signature • Signatures of custodians relinquishing and receiving custody of samples including date and time of transfer until time of final disposition • Analytical laboratory • Off-site shipping information (date, time, shipper, mode, air bill or lading number) (Section C1-5)	CCP-TP-093, Att. 1	Y	ANHSGS100003 (HSG-1)	Y	
208	Are procedures are in place to ensure that samples and sampling equipment are identified with unique identification numbers? (Section C1-5)	CCP-TP-093, Att. 1 Att. 2	Y	ANHSGS100003 (HSG-1)	Y	

	WAP Requirement ¹ ANL/CCP Certification Audit, A-11-20, August 2-4, 2011 Table C6-4 Headspace Gas Checklist	Procedure Documented		Example of Implementation/ Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N(Why?)	Item Reviewed	Adequate? Y/N	
209	Do sample tags or labels contain the following information: <ul style="list-style-type: none"> • Sample Description • Ambient temperature and pressure • Sample identification number • Analyses requested • Date/Time of collection • QC Designation (if applicable) • Sampler's initials and organization (Section C1-5)	CCP-TP-093, (All)	Y	ANHSGS100003 (HSG-1)	Y	
210	All sampling equipment, canisters, and samples are identified with unique identification numbers that are traceable to equipment cleaning batches? (Section C1-5)	CCP-TP-093, Canister- TagsAtt. 1	Y	ANHSGS100003 (HSG-1)	Y	
211	Are procedures in place to ensure samples are sealed with intact custody seals and that one or more of the following custody conditions are met: <ul style="list-style-type: none"> • It is in the possession of an authorized individual • It is in the view of an authorized individual, after being in the possession of that individual • It was in the possession of an authorized individual and access to the sample was controlled by locking or placement of signed custody seals that prevent undetected access • It is in a designated secure area, such as a controlled access location with complete documentation of personnel access or a radiological containment area (hot cell or glove box) (Section C1-5)	CCP-TP-093, Att. 1	Y	ANHSGS100003 (HSG-1)	Y	
212	Are procedures in place to ensure that discrepant sample information, indications of damage, or indications of tampering are documented? (Section C1-5)	CCP-TP-093, Att. 1	Y	ANHSGS100003 (HSG-1)	Y	
214	Are procedures in place to ensure that sample custody is maintained until the sample is released by the site project manager or expended? (Section C1-5)	CCP-TP-093, Att. 1	Y	ANHSGS100003 (HSG-1) ANHSGS100003 ECL10033G ECL10033M (GEN-2) CP:09:01124 -	Y	

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		Location	Adequate? Y/N(Why?)	Item Reviewed	Adequate? Y/N	
				Delegation of Authority to Release Central Characterization Project Headspace Gas Samples (GEN-7)		
215	Are procedures in place to ensure that SUMMA® canisters are packaged to prevent damage to the pressure gauge or associated connections by packaging in metal boxes with separate compartments or cardboard boxes with foam inserts? (Section C1-6)	CCP-TP-093, S. 4.7.2 S. 4.7.3	Y	ANHSGS100003 (HSG-1)	Y	
216	Are procedures in place to ensure that samples are packaged to prevent damage to the sample container and maintain preservation temperature? (Section C1-6)	CCP-TP-093, S. 4.7.3	Y	ANHSGS100003 (HSG-1)	Y	
217	Are procedures in place to ensure that adequate cold packs are included in the DOT approved sample shipping container to ensure that all temperature requirements are met? (Section C1-6)	CCP-TP-093, S. 4.7.1	Y	ANHSGS100003 (HSG-1)	Y	The receiving lab records the temperatures. This is audited during the lab audit.
218	Are procedures in place to ensure that sample COC forms are secured for shipment to the inside of the sealed or locked shipping container lid and that samples and shipping containers are affixed with tamper proof seals or devices? (Section C1-6)	CCP-TP-093, S. 4.7.9	Y	ANHSGS100003 (HSG-1)	Y	
219	Are procedures in place to ensure that an appropriate blank sample is included with each shipment container to detect any VOC cross-contamination? (Section C1-6)	NA	NA	NA	NA	This blank sample is intended for solids or soil/gravel wastes only.
LABORATORY OPERATIONS						
220	Are procedures in place to ensure that all VOC analyses are evaluated using the following criteria: <ul style="list-style-type: none"> Precision is assessed by analyzing of laboratory duplicates, Laboratory Control Sample (LCS), and PDP blind-audit samples in comparison to Table C3-2 Accuracy is as %R shall be assessed by analyzing LCS samples and PDP blind audit samples in comparison to criteria in Table C3-3 MDLs are expressed in nanograms for VOCs and must be less than or equal to those listed in Table 3-2 Laboratory completeness shall be expressed as the number of samples analyzed with valid results as a percent of the total number of samples submitted for analysis. A composited sample is treated as one sample for the purposes of completeness, because only one sample is run through 	NA	NA	NA	NA	This is a sampling audit for ANL/CCP.

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		Location	Adequate? Y/N(Why?)	Item Reviewed	Adequate? Y/N	
	the analytical instrument <ul style="list-style-type: none"> Comparability shall be achieved through the use of standardized methods, traceable standards by requiring successful participation in the PDP program Representativeness will be achieved by collecting sufficient numbers of samples using clean sampling equipment that does not introduce sample bias. All method detection limits and program required detection limits shall be less than the Program Required Detection Limits listed in Table C3-2 and the detection limit study procedures shall be documented in laboratory SOPs. In addition, the laboratory shall demonstrate that they are capable of meeting the Program Required Detection Limits by analyzing at least one calibration standard below the PRQL (Section C3-5)					
221	Are procedures in place to ensure that only laboratories that are qualified through participation in the Performance Demonstration Program are eligible to analyze waste samples? (Section C-3a(3))	NA	NA	NA	NA	This is evaluated during the laboratory audit.
222	Are procedures in place to ensure that Tentatively Identified Compounds shall be added to the target compound list if they are reported in 25% of the waste containers sampled from a given waste stream and if they appear in the 20 NMAC 4.1.200 (incorporating 40 CFR Part 261) Appendix VIII list? (Section C-3a(1))	CCP-TP-003, S. 4.3	Y	ANHSGS100003 ECL10033G ECL10033M (GEN-2) CP:08:00374 – Transmittal of Waste Stream Profile Form, Attachment 2, for Remote Handled Waste Stream AERHDM at the Argonne National Laboratory with Characterization Information Summary CP:08:00375 - Transmittal of Waste Stream Profile Form, Attachment 4, for Remote Handled Waste Stream AERHDM at the Argonne National Laboratory (GEN-3)	Y	
222a	Are procedures documented to ensure that the following criteria are met with regard to the recognition and reporting of TICS for GC/MS Methods for headspace gas	NA	NA	NA	NA	This is evaluated during the laboratory audit.

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		Location	Adequate? Y/N(Why?)	Item Reviewed	Adequate? Y/N	
	<p>sampling:</p> <ul style="list-style-type: none"> Relative intensities of major ions in the reference spectrum (ions greater than 10% of the most abundant ion) should be present in the sample spectrum. The relative intensities of the major ions should agree within ± 20 percent. Molecular ions present in the reference spectrum should be present in the sample spectrum. Ions present in the sample spectrum but not in the reference spectrum should be reviewed for possible background contamination or presence of coeluting compounds. Ions present in the reference spectrum but not in the sample spectrum should be reviewed for possible subtraction from the sample spectrum because of background contamination or coeluting peaks. The reference spectra used for identifying TICs shall include, at minimum, all of the available spectra for compounds that appear in the 20.4.1.200 NMAC (incorporating 40 CFR Part 261) Appendix VIII list. The reference spectra may be limited to VOCs when analyzing headspace gas samples. TICs for headspace gas analyses that are performed through FTIR analyses shall be identified in accordance with the specifications of SW-846 Method 8410. <p>(Section C3-1)</p>					
222b	<p>Are procedures in place to assure that TICs are reported as part of the analytical batch data reports for GC/MS Methods in accordance with the following minimum criteria:</p> <ul style="list-style-type: none"> a TIC in an individual container headspace gas or solids sample shall be reported in the analytical batch data report if the TIC meets the SW-846 identification criteria listed above and is present with a minimum of 10% of the area of the nearest internal standard. a TIC in a composited headspace gas sample that contains 2 to 5 individual container samples shall be reported in the analytical batch data report if the TIC meets the SW-846 identification criteria listed above and is present with a minimum of 2% of the area of the nearest internal standard. a TIC in a composited headspace gas sample that contains 6 to 10 individual container samples shall be reported in the analytical batch data report if the TIC meets the SW-846 identification criteria listed above and is present with a minimum of 1% of the area of the nearest internal standard. a TIC in a composited headspace gas sample that contains 11 to 20 	NA	NA	NA	NA	This is evaluated during the laboratory audit.

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		Location	Adequate? Y/N(Why?)	Item Reviewed	Adequate? Y/N	
	individual container samples shall be reported in the analytical batch data report if the TIC meets the SW-846 identification criteria listed above and is present with a minimum of 0.5% of the area of the nearest internal standard. (Section C3-1)					
QUALITY ASSURANCE OBJECTIVES						
224	Are procedures in place to ensure that the precision of the headspace gas sampling and analysis must be assessed by the sequential collection of field duplicates for manifold sampling operations or simultaneous collection of field duplicates for direct canister sampling operations for VOCs? (Section C3-2)	CCP-TP-093, S. 2.6.1 S. 4.4.2 S. 4.5.4	Y	ANHSGS100003 (HSG-1)	Y	
225	Are procedures in place to ensure that corrective action will be taken if the duplicate RPD exceeds 25% for any analyte found greater than the PRQL in both of the duplicate samples? (Section C3-2)	CCP-TP-001, S. 4.2 Att. 10	Y	ANHSGS100003 ECL10033G ECL10033M (GEN-2)	Y	Headspace Gas: NA – This is evaluated at Project Level. No duplicate samples have exceeded the PRQL.
226	Are procedures in place to ensure that the accuracy of headspace gas sampling is assessed through the collection of field reference standards and at a frequency of one field response standard for every 20 containers sampled or per sampling batch and through the collection of equipment blanks at the frequency of one for every equipment cleaning batch ? (Section C3-2)	CCP-TP-093, S. 2.6.2 S. 4.5.6	Y	ANHSGS100003 (HSG-1)	Y	Verified information included in the ITR checklist included in the BDR. Reference letter number CP:08:00377.
227	Are procedures in place to ensure that corrective actions are taken if the field reference standard is less than 70% recovery or greater than 130% and that if the blank concentration for any blank exceeds 3 times the MDL listings in Table B3-2? (Section C3-2)	CCP-TP-001, S. 4.2 Att. 10	Y	CP:08:00377 – Report of Field Reference Standard Results for the Central Characterization Project – Argonne National Laboratory (GEN-6)	Y	Headspace Gas: NA – This is evaluated at the Project Level.
228	Are procedures in place to ensure that sampling completeness shall be expressed as the number of valid samples collected as a percent of the total number of samples collected for each waste stream, where a valid sample is defined as a sample collected in accordance with approved sampling methods and the drum was properly prepared for sampling? (Section C3-2)	CCP-TP-002, Att. 1 CCP-TP-106, Att. 3	Y	ANHSGS100003 ECL10033G ECL10033M (GEN-2) CP:08:00374 – Transmittal of Waste Stream Profile Form, Attachment 2, for Remote Handled Waste Stream AERHDM at the Argonne National Laboratory with Characterization Information Summary	Y	

	WAP Requirement ¹ ANL/CCP Certification Audit, A-11-20, August 2-4, 2011 Table C6-4 Headspace Gas Checklist	Procedure Documented		Example of Implementation/ Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N(Why?)	Item Reviewed	Adequate? Y/N	
				CP:08:00375 - Transmittal of Waste Stream Profile Form, Attachment 4, for Remote Handled Waste Stream AERHDM at the Argonne National Laboratory (GEN-3)		
229	Are procedures in place to ensure that the minimum sampling completeness percentage for any waste stream is 90 percent? (Section C3-2)	CCP-TP-002, Att. 1 CCP-TP-106, Att. 3	Y	ANHSGS100003 ECL10033G ECL10033M (GEN-2) CP:08:00374 - Transmittal of Waste Stream Profile Form, Attachment 2, for Remote Handled Waste Stream AERHDM at the Argonne National Laboratory with Characterization Information Summary CP:08:00375 - Transmittal of Waste Stream Profile Form, Attachment 4, for Remote Handled Waste Stream AERHDM at the Argonne National Laboratory (GEN-3)	Y	
230	Are procedures in place to ensure that sample comparability is assured through the use and application of uniform procedures and equipment and application of data usability criteria, and that corrective action is taken if the uniform procedures and equipment are not used without approved and justified deviations? (Section C3-2)	CCP-TP-093, (All) CCP-TP-106, (All)	Y	ANHSGS100003 (HSG-1)	Y	
231	Are procedures in place to ensure that sample representativeness is maintained? (Section C3-2)	CCP-TP-093, (All)	Y	ANHSGS100003 (HSG-1)	Y	

1. The WAP requirements should be presented in documents, such as procedures. Each of the questions posed under WAP requirements is meant to ask whether procedures are in place or whether documents are evident which demonstrate that the specific WAP requirement is or can be met.

