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NEW MEXICO  
ENVIRONMENT DEPARTMENT



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CERTIFIED MAIL - RETURN RECEIPT REQUESTED

April 13, 2012

Jose Franco, Manager  
Carlsbad Field Office  
Department of Energy  
P.O. Box 3090  
Carlsbad, New Mexico 88221-3100

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

**RE: NMED APPROVAL OF THE SAVANNAH RIVER SITE/CENTRAL CHARACTERIZATION PROJECT FINAL AUDIT REPORT, AUDIT A-12-04 WASTE ISOLATION PILOT PLANT EPA I.D. NUMBER NM4890139088**

Dear Messrs. Franco and Sharif:

On February 28, 2012, the New Mexico Environment Department (NMED) received the Final Audit Report of the Savannah River Site/Central Characterization Project (SRS/CCP) Audit Number A-12-04 (Audit Report), from the Department of Energy's Carlsbad Field Office (CBFO). CBFO and Washington TRU Solutions LLC (the Permittees) were required to submit this Audit Report under the Waste Isolation Pilot Plant (WIPP) Hazardous Waste Facility Permit as specified in Permit Section 2.3.2.3. The intended scope of this initial certification audit was to ensure the adequacy, implementation, and effectiveness of the SRS/CCP waste characterization processes for retrievably stored remote handled (RH) Summary Category Group (SCG) S5000 debris waste, relative to the requirements of the WIPP Permit.

The Audit Report consisted of the following items:

- A narrative report (hardcopy and electronic)
- Copies of relevant Permit Attachment C6 checklists (hardcopy and electronic)
- Final SRS/CCP standard operating procedures for characterization of the waste categories listed above (hardcopy and electronic)



- Objective evidence examined during the audit:
  - General information
  - Acceptable knowledge
  - Headspace gas sampling
  - Real-time radiography

NMED representatives observed the audit on November 14-17, 2011. NMED has examined the Audit Report for evidence of compliance with the requirements of Permit Sections 2.3.2 (Audit and Surveillance Program) and 2.3.1 (Waste Analysis Plan [WAP]). The Audit Report indicates there were two observations (conditions that, if not controlled, could result in conditions adverse to quality) and two recommendations for management consideration. They are:

- Observation 1: The individual who performed the Site Project Manager (SPM) review of the RH Headspace Gas Sampling Batch Data Report (BDR) SRHG 1102 was not on the current list (November 14, 2011) of Qualified SPMs as an RH Site SPM. In addition, the individual does not have a qualification card (Form RH SPM-01) for "RH Sites". (No specific qualification requirements are defined in procedure CCP-QP-002).
- Observation 2: No objective evidence was found to verify that SPMs had read the RH Acceptable Knowledge (AK) Summary Reports (CCP-AK-SRS-580 and CCP-AK-SRS-500).
- Recommendation 1: The audit team recommended that SRS/CCP revise the affected AK documentation to ensure compliance with the December 2010 WAP requirements.
- Recommendation 2: The audit team recommended that RH BDRs include "RH" as part of the BDR identification.

Attached are NMED's general comments based upon review of the Audit Report. These are provided to guide future audit report preparation and to assist the Permittees in understanding NMED's concerns.

NMED concludes that this Audit Report demonstrates that SRS/CCP has implemented the applicable characterization requirements of the WAP. Therefore, NMED approves the Permittees' Final Audit Report for SRS/CCP Audit A-12-04 for this initial certification of RH S5000 debris waste.

This Audit Report approval is of the broad programmatic implementation of waste characterization requirements at SRS/CCP, and does not constitute approval of individual waste characterization procedures, nor condone inappropriate applications of those procedures. This approval does not relieve the Permittees of their obligation to comply with the requirements of the permit or other applicable laws and regulations.

If you have any questions regarding this matter, please contact Trais Kliphuis at (505) 476-6051.

Sincerely,



John Kieling  
Acting Chief  
Hazardous Waste Bureau

JEK: tlk

cc: Jim Davis, Director, NMED RPD  
Trais Kliphuis, NMED HWB  
Tim Hall, NMED HWB  
Steve Holmes, NMED HWB  
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**NMED COMMENTS ON THE  
SAVANNAH RIVER SITE/CENTRAL CHARACTERIZATION PROJECT  
(SRS/CCP) FINAL AUDIT REPORT A-12-04**

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

1. Question 37 of the C6 Checklist indicates that there is the following as redline and redline strikeout: "...generation or recording of the data under review ~~characterization of the waste or the generation of data.~~" Because the Audit Report will be in the NMED Administrative Record, this needs to be corrected to remove the strike out language and to change the language in red to black.
2. Question 40 of the C6 Checklist Bullet 8 indicates that there is the following as redline and redline strike out: "... ~~the original characterization of the waste container or the~~ generation or recording of the data under review." Because the Audit Report will be in the NMED Administrative Record, this needs to be corrected to remove the strike out language and to change the language from red to black.
3. Questions 50, 51 and 52 of the C6 Checklist indicate that the procedure given, CCP-TP-030 (All) answers the question. The procedure was not included in the Audit Report as electronic and/or hardcopy.
4. Question 137 of the C6 Checklist indicates that the citation given, CCP-TP-005 S. 4.2.6 is not in the scope of this audit. That citation only applies to the LANL Off-Site Source Recovery Project waste. This citation should be removed from the audit checklist.
5. Question 149a of the C6 Checklist, Number 2, indicates that there is the following redline and redline strike out: "... ~~TRU mixed and TRU non-mixed... WAP... 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: a waste stream is defined as waste material that 1) is similar in material physical form, and hazardous constituents, and 2) is or was generated from a single process or activity.~~" Because the Audit Report will be in the Administrative Record, this needs to be corrected to remove the strikeout language and to change the language from red to black.
6. Question 149b of the C6 Checklist indicates that the procedure WP 13-QA.03, (All) answers the question. This procedure was not included in the Audit report as electronic and/or hard copy.
7. Question 184 of the C6 Checklist indicates that the citation given, CCP-TP-082, S. 4.2 answers the question. This citation does not exist.
8. Questions 236 and 237 of the C6 Checklist indicate that the citations given, CCP-TP-053, S. 4.4.3 [B] & [C] and CCP-TP-053, S. 4.4.3 [H.2] answers the question. These citations do not exist.
9. Question 240 of the C6 Checklist indicates that the citation given, CCP-TP-053, S. 2.3 answers all parts of the question. This citation only addresses Bullet 2. There is need of citations for Bullets 1, 3, 4, 5, and 6.

10. Question 241 of the C6 Checklist indicates that the citations given, CCP-TP-053, S. 2.3[B] and 4.4.2[C], answer the question. CCP-TP-053, S. 4.4.2[C] does not answer the question as it refers to the initiation of a NCR if the waste cannot be penetrated utilizing RTR. In addition, citation CCP-TP-053, S. 2.3[B] does not exist.
11. Question 245 of the C6 Checklist indicates that the citation given, CCP-TP-053, S. 4.4.2[H-2] answers the question. The correct citation should be CCP-TP-053 [H.2].
12. Question 248 of the C6 Checklist indicates that the citation given was CCP-QP-002, S. 4.3.2[A-2] answers the question. The correct citation should be CCP-QP-002, S. 4.3.2 [A.2].
13. Question 262 of the C6 Checklist indicates that the citation given CCP-QP-002, S. 4.3.2[C-2] answers the question. The correct citation should be CCP-QP-002, S. 4.3.2[C.2].
14. On page 8 of 12 of the Final Audit Report it states, "The nine 55-gallon drums in this waste stream were originally included in contact-handled (CH) waste stream SR-W027-FB- Pre86-C, but during characterization were set aside as RH waste due to a higher Am-241 content."; however, on #134 and #136 of the checklist it states that there are 8 drums in the waste stream. Please explain the discrepancy.