

**Allen, Pam, NMENV**



**From:** Maestas, Ricardo, NMENV  
**Sent:** Wednesday, July 11, 2012 11:50 AM  
**To:** Allen, Pam, NMENV  
**Subject:** FW: LANL Scope for 20/21 June Tier 1 Evaluation - Please pass to anyone I missed  
**Attachments:** LANL NDA T1 and CC Scope June 20-21 2012.pdf

WIPP file

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**From:** Kieling, John, NMENV  
**Sent:** Monday, June 11, 2012 8:33 AM  
**To:** Kliphuis, Trais, NMENV; Holmes, Steve, NMENV; Maestas, Ricardo, NMENV  
**Subject:** FW: LANL Scope for 20/21 June Tier 1 Evaluation - Please pass to anyone I missed

FYI...

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**From:** Ed Feltcorn [<mailto:Feltcorn.Ed@epamail.epa.gov>]  
**Sent:** Monday, June 11, 2012 7:46 AM  
**To:** [j.r.stroble@wipp.ws](mailto:j.r.stroble@wipp.ws); Morgan, Thomas - DOE; Site Documents - DOE  
**Cc:** [Craig.Simmons@wipp.ws](mailto:Craig.Simmons@wipp.ws); Nick Stone; [joglekar.rajani@epa.gov](mailto:joglekar.rajani@epa.gov); [lcvccompany@comcast.net](mailto:lcvccompany@comcast.net); [pkelly@scainc.com](mailto:pkelly@scainc.com); Tom Peake; Mike Eagle; Kieling, John, NMENV; Hall, Timothy, NMENV  
**Subject:** LANL Scope for 20/21 June Tier 1 Evaluation - Please pass to anyone I missed

*(See attached file: LANL NDA T1 and CC Scope June 20-21 2012.pdf)*



**Scope of EPA's Tier 1 Evaluation of Calibration Extensions for the High Efficiency Neutron Counter No.1 (HENC1) and the Super High Efficiency Neutron Counter (SHENC) For Contact Handled TRU waste at LANL-CCP And the Continued Compliance of the HENC2 and the High Energy RTR**

**DOE Site:** Los Alamos National Laboratory-Central Characterization Project (LANL-CCP)

**Organizations Notified:** Department of Energy – Carlsbad Field Office  
EPA Region 6  
New Mexico Environment Department

**Evaluation Dates:** June 20-21, 2012

**Evaluation Schedule:** Wednesday 8:00 am Kick-Off Meeting\*  
Wednesday 8:30 am – 4:00 pm Conduct Inspection  
Thursday 8:00 am – 2:30 pm Conduct Inspection  
Thursday 3:00 pm Close-Out Meeting\*

\* With CBFO National TRU Program staff, DOE-LANL, and LANL-CCP technical leads

**EPA Evaluation Team:** Mr. Ed Felcorn, EPA Lead Inspector  
Ms. Rajani Joglakar, EPA Inspector  
Mr. Patrick Kelly, EPA Support Contractor (SC&A)  
Ms. Dorothy Gill, EPA Support Contractor (SC&A)

**Evaluation Scope:**

EPA will conduct an evaluation of the Tier 1 (T1) requests for the calibration extension of the HENC1 and SHENC requested by CBFO/CCP. In accordance with 40 CFR 194.8(b) EPA will evaluate the adequacy, implementation, and effectiveness of the selected technical processes implemented by LANL-CCP for characterizing contact-handled (CH) transuranic (TRU) waste. EPA will also evaluate the continued compliance of the HENC2 and the High Energy Real-Time Radiography (HE-RTR) unit.

**Documentation:**

EPA requested documentation to support the two T1 changes. The list of documentation includes LANL-CCP documents that will allow EPA to verify the following:

- The HENC1 and SHENC NDA systems are the same systems in the same operational configuration that EPA had inspected and approved previously at LANL-CCP
- The qualification and training for all personnel responsible for calibration, performance testing, operation and data reporting and validation of the HENC1 and SHENC
- Adequacy of the LANL-CCP procedures for the calibration, operation and data reporting/validation for HENC1 and SHENC to ensure that all aspects of the NDA process are appropriately documented
- The pedigree of radionuclide sources used for calibration and performance testing for the proposed measurement configuration
- The calibrated range/operational range in terms of radionuclide type and activity, and sample matrix for the proposed measurement configurations of the HENC1 and SHENC
- Other specific technical aspects of the HENC1 and SHENC for their proposed measurement configuration, as appropriate
- Ability of the HENC1 and SHENC to identify and quantify the ten EPA-tracked radionuclides ( $^{238}\text{Pu}$ ,  $^{239}\text{Pu}$ ,  $^{240}\text{Pu}$ ,  $^{242}\text{Pu}$ ,  $^{233}\text{U}$ ,  $^{234}\text{U}$ ,  $^{238}\text{U}$ ,  $^{241}\text{Am}$ ,  $^{90}\text{Sr}$  and  $^{137}\text{Cs}$ ) and assign an uncertainty to each value in the proposed measurement configuration(s)
- Performance tests, i.e., calibration confirmation, that LANL-CCP used to accept the operation in the proposed measurement configuration of the HENC1 and SHENC
- Participation of the HENC1 and SHENC's in the CBFO-sponsored NDA Performance Demonstration Program (NDA PDP) in the proposed measurement configuration(s)
- We will also request that the HENC1 and SHENC perform replicate analyses, the results of which EPA will evaluate relative to the proposed measurement configuration(s)

For the HE-RTR we request:

- A list of BDRs and waste containers that have been promoted through project level review and the availability to examine written and visual records for all RTR BDRs
- A list of qualified personnel (operators and subject matter experts) and qualification packages for all qualified personnel (current List of Qualified Individuals or LOQI)
- A list of the items contained in the HE RTR qualification container

**Logistics:**

- A pre-evaluation conference/Kick-Off Meeting will be held Monday, June 20, 2012 at 8:30 am at a location designated by LANL-CCP.

- A post-evaluation EPA briefing/Close-Out Meeting will be held Thursday, June 21, 2012, at 3:00 pm for this evaluation.

CBFO NTP and CBFO QA are invited to send observers to this activity.