ENCLOSED

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

JUN 1 3 2012

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

Subject: Transmittal of Audit Plan and Notification of Assigned Auditors for CBFO Audit A-12-12 of the LANL/CCP

Dear Mr. Kieling:

This letter transmits the audit plan for Carlsbad Field Office (CBFO) Recertification Audit A-12-12 of the Los Alamos National Laboratory Central Characterization Project (LANL/CCP) for transuranic waste characterization activities. The audit will be conducted as required by the Waste Isolation Pilot Plant Hazardous Waste Facility Permit, and will be held at the Skeen-Whitlock Building in Carlsbad, New Mexico, and at LANL, July 24-26, 2012. The audit plan identifies the audit team members, as required by the Permit.

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 question, please contact Mr. Courtland Fesmire at (575) 234-7548.

Sincerely,

J. R. Stroble for

Jose R. Franco, Manager
Carlsbad Field Office

Enclosure

cc: w/ enclosure

E. Ziemianski, CBFO	*ED
R. Unger, CBFO	ED
J.R. Stroble, CBFO	ED
G. Basabilvazo, CBFO	ED
C. Fesmire, CBFO	ED
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T. Kliphuis, NMED	ED
S. Holmes, NMED	ED
R. Maestas, NMED	ED
G. Knox, CTAC	ED
G. White, CTAC	ED
WIPP Operating Record	ED
CBFO QA File	
CBFO M&RC	

*ED denotes electronic distribution

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CBFO:OQA:CF:CC:12-1423:UFC 2300.00

CARLSBAD FIELD OFFICE AUDIT PLAN

Audit Number: A-12-12

Organization to be Audited: Los Alamos National Laboratory (LANL), Washington TRU Solutions, LLC (WTS) Central Characterization Project (CCP)

Organizations to be Notified:
LANL
WTS CCP
U.S. Environmental Protection Agency (EPA)
New Mexico Environment Department (NMED)
Defense Nuclear Facilities Safety Board (DNFSB)

Date and Location:
July 24 – 26, 2012
Los Alamos, New Mexico
Carlsbad, New Mexico

Audit Team:

Courtland Fesmire	Audit Team Management Representative Carlsbad Field Office (CBFO)
Greg Knox	Audit Team Leader, CBFO Technical Assistance Contractor (CTAC)
Rick Castillo	Auditor, CTAC
Earl Bradford	Auditor, CTAC
Cindy Castillo	Auditor, CTAC
Berry Pace	Auditor, CTAC
Tammy Bowden	Auditor, CTAC
Tommy Putnam	Auditor, CTAC
Katie Martin	Auditor, CTAC
Porf Martinez	Auditor/Technical Specialist, CTAC
Dick Blauvelt	Technical Specialist, CTAC
Paul Gomez	Technical Specialist, CTAC
Mavis Lin	Technical Specialist, CTAC
Rhett Bradford	Technical Specialist, CTAC
James Oliver	Technical Specialist, CTAC
B. J. Verret	Technical Specialist, CTAC
Joe Willis	Technical Specialist, WTS

Audit Scope:

The audit team will evaluate the continued adequacy, implementation, and effectiveness of the CCP quality assurance (QA), technical, and transportation activities performed at LANL for characterization, certification, and transportation of contact-handled (CH) Summary Category Group (SCG) S3000 homogeneous solids waste and SCG S5000 debris waste. See the attachment, "Processes and Equipment to be Evaluated During Audit A-12-12 of the LANL/CCP," for additional details.

In addition to recertification of existing processes, the CBFO Office of the National TRU Program (NTP) has requested initial certification of retrievably stored CH SCG S4000 soils/gravel waste, and evaluation for calibration extension of the certified High-Efficiency

Neutron Counter #1 to assay a population of lead-lined 55-gallon drums and evaluation for extension of the calibration range of the certified Super High-Efficiency Neutron Counter with high resolution gamma spectrometry measurement to 2.5 g/cc.

Governing Documents/Requirements

Overall program adequacy and effectiveness of the LANL/CCP processes will be based on the current revisions of the following documents.

- DOE/CBFO-94-1012, *Quality Assurance Program Document* (QAPD)
- Hazardous Waste Facility Permit Waste Isolation Pilot Plant, EPA No. NM4890139088-TSDF, the New Mexico Environment Department
- DOE/WIPP-02-3122, *Transuranic Waste Acceptance Criteria for the Waste Isolation Pilot Plant*
- *Contact-Handled Transuranic Waste Authorized Methods for Payload Control* (CH-TRAMPAC)

Programmatic and technical checklists will be developed from current revisions of the following documents.

- CCP-PO-001, *CCP Transuranic Waste Characterization Quality Assurance Project Plan*
- CCP-PO-002, *CCP Transuranic Waste Certification Plan*
- CCP-PO-003, *CCP Transuranic Authorized Methods for Payload Control (CCP CH-TRAMPAC)*
- CCP-PO-012, *CCP/LANL Interface Document*
- Related CCP QA and technical implementing procedures

Activities to be Audited:

General

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

C6-1 and C6-3 and General Quality Assurance Program Elements

- Personnel Qualification and Training
- Nonconformances
- Records
- Identification and Control of Items
- Documents/Records Control (notebooks/logbooks)

Technical

- Acceptable Knowledge (AK)
- Generation and Project-Level Data Validation and Verification (V&V)
- Headspace Gas (HSG) Sampling
- Visual Examination (VE)
- Visual Examination Technique (VET), Off-Site Source Recovery Program

- Real-time Radiography (RTR)
- Nondestructive Assay (NDA) and participation in the Performance Demonstration Program (PDP)
- WIPP Waste Information System (WWIS)/Waste Data System (WDS)
- Waste Certification (e.g., Waste Stream Profile Form)

Transportation

- Flammable Gas Analysis
- Waste Certification
- Load Management
- Payload Assembly and Loading
- Packaging Operations
- Leak Testing
- Shipping Documentation
- Shipping
- Container Management

Schedule of Audit Activities:

A pre-audit conference will be scheduled for Tuesday, July 24, 2012, at 8:30 a.m.

Audit team caucus meetings will be held Tuesday, July 24 and Wednesday July 25, at 3:30 p.m., and Thursday, July 26, 2012, at 2:00 p.m.

The audit team will brief appropriate LANL and CCP management on Wednesday, July 25, and Thursday, July 26, 2012, at 8:30 a.m.

A post-audit conference is scheduled for Thursday, July 26, 2012, at 4:00 p.m.

All meetings will take place at designated LANL and CBFO locations to be determined by LANL/CCP management.

Prepared by: _____ **Date:** 5 JUN 2012
Greg Knox, CTAC
Audit Team Leader

Concurrence: _____ **Date:** 12 Jun 12
Randy Unger, CBFO
Director, Office of Quality Assurance

Processes and Equipment to be Evaluated During Audit A-12-12 of the LANL/CCP

WIPP #	Process/Equipment Description	Applicable to the Following Waste Streams/Groups of Waste Streams	Currently Approved by NMED	Currently Approved by EPA
PROCESSES TO BE EVALUATED FOR INITIAL CERTIFICATION				
11RR2	Real-Time Radiography (RTR) Procedure(s) – CCP-TP-053 and CCP-TP-028 Description – Real-Time Radiography (RTR) Mobile Characterization System [built by VJ Technologies] 55-gallon drums	Soils/Gravel (S4000)	NO	NO
11HERTR3	High Energy Real Time Radiography (HERTR) Procedures CCP-TP-053 and CCP-TP-028 Description – High Energy Real-Time Radiography (RTR) [built by VJ Technologies] 55-gallon drums and SWBs	Soils/Gravel (S4000)	NO	NO
11HC1	Nondestructive Assay Procedure – CCP-TP-064 Description – Canberra Industries High-Efficiency Neutron Counter (HENC) mounted in a transportation container	Soils/Gravel (S4000)	N/A	NO
11HC2	Nondestructive Assay Procedure – CCP-TP-064 Description – Canberra Industries High-Efficiency Neutron Counter (HENC) mounted in a trailer	Soils/Gravel (S4000)	N/A	NO
11SHC1	Nondestructive Assay Procedure – CCP-TP-059 and CCP-TP-103 Description – Super High-Efficiency Neutron Counter mounted in a trailer, SWBs	Soils/Gravel (S4000)	N/A	NO

Processes and Equipment to be Evaluated During Audit A-12-12 of the LANL/CCP

WIPP #	Process/Equipment Description	Applicable to the Following Waste Streams/Groups of Waste Streams	Currently Approved by NMED	Currently Approved by EPA
N/A	WWIS/WDS Procedure – CCP-TP-030 Description – CH TRU Waste Characterization and WWIS Data Entry	Soils/Gravel (S4000)	NO	NO
N/A	Quality Assurance Program	Soils/Gravel (S4000)	N/A	NO
PREVIOUSLY APPROVED PROCESSES OR EQUIPMENT				
N/A	Headspace Gas Sampling Procedure – CCP -TP-093 Description – Headspace Gas Sampling (HSG)	Debris (S5000)	YES	N/A
11RR1	Real-Time Radiography (RTR) Procedure(s) – CCP-TP-053 and CCP-TP-028 Description – Real-Time Radiography (RTR) Mobile Characterization System [built by VJ Technologies] 55-gallon drums	Solids (S3000) Debris (S5000)	YES	YES
11RR2	Real-Time Radiography (RTR) Procedures – CCP-TP-053 and CCP-TP-028 Description – Real-Time Radiography (RTR) Mobile Characterization System [built by VJ Technologies] 55-gallon drums	Solids (S3000) Debris (S5000)	YES	YES
11HERTR3	High Energy Real-Time Radiography (HERTR) Procedures CCP-TP-053 and CCP-TP-028 Description – High Energy Real-Time Radiography (RTR) [built by VJ Technologies] 55-gallon drums and SWBs	Solids (S3000) Debris (S5000)	YES	YES

Processes and Equipment to be Evaluated During Audit A-12-12 of the LANL/CCP

WIPP #	Process/Equipment Description	Applicable to the Following Waste Streams/Groups of Waste Streams	Currently Approved by NMED	Currently Approved by EPA
11VE1	CH Visual Examination Procedure – CCP-TP-113 Description – CH Characterization performed utilizing Visual Examination (VE) and Acceptable Knowledge (AK)	Solids (S3000) Debris (S5000	YES	YES
11VE2	Off-Site Source Recovery Program Procedure(s) – CCP-TP-069 and CCP-TP-101 Description – Characterization performed utilizing Visual Examination (VE) and Acceptable Knowledge (AK)	Debris (S5000)	YES	YES
N/A	Acceptable Knowledge Procedure – CCP-TP-005 Description – Acceptable Knowledge (AK)	Solids (S3000) Debris (S5000)	YES	YES
N/A	Data Verification and Validation Procedure(s) – CCP-TP-001, CCP-TP-002, CCP-TP-003, CCP-TP-103, CCP-TP-162	Solids (S3000) Debris (S5000)	YES	YES
11HC1	Nondestructive Assay Procedure – CCP-TP-064 Description – Canberra Industries High Efficiency Neutron Counter (HENC) mounted in a transportation container	Solids (S3000) Debris (S5000)	N/A	YES
11HC2	Nondestructive Assay Procedure – CCP-TP-064 Description – Canberra Industries High Efficiency Neutron Counter (HENC) mounted in a trailer	Solids (S3000) Debris (S5000)	N/A	YES

Processes and Equipment to be Evaluated During Audit A-12-12 of the LANL/CCP

WIPP #	Process/Equipment Description	Applicable to the Following Waste Streams/Groups of Waste Streams	Currently Approved by NMED	Currently Approved by EPA
11SHC1	Nondestructive Assay Procedure – CCP-TP-059 and CCP-TP-103 Description – Super High-Efficiency Neutron Counter mounted in a trailer, SWBs	Solids (S3000) Debris (S5000)	N/A	YES
N/A	WWIS/WDS Procedure – CCP-TP-030 Description – CH TRU Waste Characterization and WWIS Data Entry	Solids (S3000) Debris (S5000)	YES	YES
N/A	Transportation Procedure(s) – CCP-TP-054, CCP-TP-055, CCP-TP-086, DOE/WIPP-02-3184, DOE/WIPP-02-3220, DOE/WIPP-02-3183	Solids (S3000) Debris (S5000)	N/A	N/A
11HG2	Flammable Gas Analysis Procedure – DOE/WIPP-06-3345 Description – Flammable Gas Analysis (FGA)	Solids (S3000) Debris (S5000)	N/A	N/A
N/A	Headspace Gas Sampling Procedure – CCP-TP-093 Description – Summa Sampling only	Debris (S5000)	N/A	N/A
N/A	Quality Assurance Program	Solids (S3000) Debris (S5000)	N/A	YES