



**Allen, Pam, NMENV**

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**From:** Maestas, Ricardo, NMENV  
**Sent:** Tuesday, September 25, 2012 11:07 AM  
**To:** Allen, Pam, NMENV  
**Subject:** FW: Corrections of the C6 Checklist for BAPL/CCP Audit A-12-10  
**Attachments:** Corrections of the C6 Checklist BAPL\_CCP A-12-10.docx

WIPP file

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**From:** Kliphuis, Trais, NMENV  
**Sent:** Thursday, August 23, 2012 11:14 AM  
**To:** Most, Wille - RES  
**Cc:** Kieling, John, NMENV; Maestas, Ricardo, NMENV; Holmes, Steve, NMENV  
**Subject:** FW: Corrections of the C6 Checklist for BAPL/CCP Audit A-12-10

Hi Willie,

Attached are the corrections that Steve Holmes has identified so far. Please let Steve know if you have questions.

Also, please note that if you submit a revised page, we will still need sufficient time to review the documents prior to our deadline of September 9, 2012. At the very latest, please submit by COB Wednesday, August 29, 2012.

Thanks,

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**NMED COMMENTS ON THE**  
**BETTIS ATOMIC POWER LABORATORY / CAENTRAL**  
**CHARACTERIZATION PROJECT (BAPL/CCP) AUDIT A-12-10**

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 1 of the C6 Checklist indicates that the citation given, CCP-PO-001, Section B-0a, answers the question. This citation does not exist. The correct citation should be CCP-PO-001, Section C-0a.
2. Question 1 of the C6 Checklist indicates that the citation given, CCP-TP-005, Section 4.4.8, NOTE above, answers the question. This citation does not answer the question referring to the definition of a waste stream. The correct citation should be CCP-TP-005, Section 4.4.11, NOTE above.
3. Question 2 of the C6 Checklist indicates that the citations given, CCP-TP-005, Sections 4.4.11 and 4.4.12. These citations do not answer the question referring to the assignment of a Summary Category Group. The correct citations should be CCP-TP-005, Sections 4.4.14 and 4.4.15.
4. Question 3 of the C6 Checklist indicates that the citation given, CCP-TP-005, Section 4.4.10 NOTE above, answers the question. This citation does not exist. The correct citation should be CCP-TP-005, Section 13, NOTE above.
5. Question 7 of the C6 Checklist indicates that the citation given, CCP-TP-005, Section 4.4.11, answers the question. This citation does not answer the question, which discusses Summary Category Group selection. The correct citation should be TTP-TP-005, Section 4.4.14.
6. Question 8 of the C6 Checklist indicates that the citations given, CCP-TP-005, Sections 4.4.13, 4.4.14, 4.4.24, 4.4.28, and 4.4.31 [K], [L], & [M] answer the question. Sections 4.4.13, 4.4.14, and 4.4.28 do not answer the question referring to hazardous characteristics. Section 4.4.31 [K], [L], and [M] does not exist. The correct citations should be CCP-TP-005, 4.4.16, 4.4.17, 4.4.27, 4.4.31, and 4.4.34 [K], [L], & [M].
7. Question 9 of the C6 Checklist indicated that the citations given, CCP-TP-005, Sections 4.4.28 & 4.4.31 [K] answer the question. Section 4.4.28 does not answer the question referring to incompatible materials and Section 4.4.31 [K] does not exist. The correct citations should be TTP-TP-005, Sections 4.4.31 & 4.4.34 [K].
8. Questions 9 and 149 of the C6 Checklist indicate that the citation given, CCP-TP-068, Section 4.2, 4.4, and Attachment 1.2 answers the question. The procedure (CCP-TP-068) was not included in the Audit Report in both hard and electronic copies.
9. Question 25 of the C6 Checklist indicates that the citations given, CCP-TP-005, Sections 4.4.8, 4.4.13, 4.4.14, 4.4.24, 4.4.28, and 4.4.31 [K], [L], & [M] answer the question. Sections 4.4.8, 4.4.13, 4.4.14, and 4.4.28 do not answer the question referring to utilize acceptable knowledge to delineate data for characterization and Section 4.4.31 [K], [L], & [M] does not exist. The correct citations should be

- CCP-TP-005, Sections 4.4.11, 4.4.16, 4.4.17, 4.4.27, 4.4.31, and 4.4.34 [K], [L], & [M].
10. Question 30 of the C6 Checklist indicates that the citations given, CCP-TP-005, Sections 4.4.8, 4.4.13, 4.4.14, 4.4.24, 4.4.28, and 4.4.31 [K], [L], & [M] answer the question. Sections 4.4.8, 4.4.13, 4.4.14, and 4.4.28 do not answer the question referring to ensure that Data Quality Objectives are met and Section 4.4.31 [K], [L], & [M] does not exist. The correct citations should be CCP-TP-005, Sections 4.4.11, 4.4.16, 4.4.17, 4.4.27, 4.4.31, and 4.4.34 [K], [L], & [M].
  11. Question 138 of the C6 Checklist indicates that the citations given, CCP-TP-005, Sections 4.4.13-4.4.18, answer the question. This is partially correct for 4.4.16-4.4.18. Sections 4.4.13-4.4.15 discusses the Waste Matrix Codes and the Question 138 refers to the assignment of EPA hazardous waste numbers. The correct citations should be  
CCP-TP-005, Sections 4.4.16-4.4.21.
  12. Questions 140 and 141 of the C6 Checklist indicates that the citation given, CCP-TP-005, Section 4.4.2 answers the question. This is incorrect in that Section 4.4.2 discusses the waste meeting the definition of defense relationship and the question does not query defense relationship. The correct citation should be CCP-TP-005, Section 4.4.5.
  13. Question 144, Part A, and 168, Part A of the C6 Checklist indicate that the citations given, CCP-TP-005, Sections 4.4.10 and 4.4.11 answer the question. This is incorrect in that these citations discuss the definition of a waste stream and not assigning the physical waste form. The correct citations should be CCP-TP-005, Sections 4.4.13 and 4.4.14.
  14. Question 144, Part B of the C6 Checklist indicate that the citation given, CCP-TP-005, Sections 4.4.8, NOTE above and 4.4.9 answer the question. Section 4.4.8, Note above does not exist and Section 4.4.9 discusses documenting and resolving discrepancies regarding AK information. The question discusses Waste Matrix Codes. The correct citations should be CCP-TP-005, Sections 4.4.11, Note above and 4.4.12.
  15. Question 144, Part H of the C6 Checklist indicates that the citations given, CCP-TP-005, Sections 4.4.13-4.4.18, answer the question. This is partially correct for 4.4.16-4.4.18. Sections 4.4.13-4.4.15 discusses the Waste Matrix Codes and the Question 138 refers to the assignment of EPA hazardous waste numbers. The correct citations should be  
CCP-TP-005, Sections 4.4.16-4.4.21.
  16. Question 144, Part I of the C6 Checklist indicates that the citation given, CCP-TP-005, Section 4.4.24 answers the question. The citation given refers to radiological data and not estimating material parameter weights as the question states. The correct citation should be CCP-TP-105, Section 4.4.27.
  17. Question 149b of the C6 Checklist indicates that the citation given, CCP-PO-001, Section B4-3f answers the question. This citation does not exist. The correct citations should be CCP-PO-001, Sections C4-3b and C4-3f.
  18. Question 156 of the C6 Checklist indicates that the citation given, CCP-TP-005,

Section 4.4.14 answers the question. This citation discusses Waste Matrix Codes and the question refers to the assignment of toxicity characteristic EPA numbers. The correct citation should be CCP-TP-005, Section 4.4.17.

19. Question 164 of the C6 checklist indicates that the citation given, CCP-TP-002, (All) answers the question. This citation is incorrect in that it refers to AK reconciliation of DQOs and reporting characterization data and the question actually refers to headspace gas characterization. The correct citation should be CCP-TP-003, Attachments 3 & 4.
20. Question 167 of the C6 Checklist indicates that the citation given, CCP-TP-002 (All) answers the question. The citation is incorrect in that it refers to AK reconciliation of DQOs and reporting characterization data and the question actually refers to headspace gas characterization. The correct citation should be CCP-TP-003, Section 4.1
21. Question 169 of the C6 Checklist indicates that the citation given, CCP-PO-001, Section B4-3f answers the question. This citation does not exist. The correct citation should be CCP-PO-001, Section C4-3f.