



SUSANA MARTINEZ  
Governor

JOHN A. SANCHEZ  
Lieutenant Governor

NEW MEXICO   
ENVIRONMENT DEPARTMENT

*Hazardous Waste Bureau*

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DAVE MARTIN  
Secretary

BUTCH TONGATE  
Deputy Secretary

JAMES H. DAVIS, Ph.D.  
Director  
Resource Protection Division

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

September 19, 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 FINAL AUDIT REPORT, BETTIS ATOMIC POWER  
LABORATORY/CENTRAL CHARACTERIZATION PROJECT, AUDIT A-12-10  
WASTE ISOLATION PILOT PLANT  
EPA I.D. NUMBER NM4890139088**

Dear Messrs. Franco and Sharif:

On August 2, 2012, The New Mexico Environment Department (NMED) received the Final Audit Report of the Bettis Atomic Power Laboratory/Central Characterization Project (BAPL/CCP) Audit Number A-12-10 (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 final audit was to ensure the adequacy, implementation, and effectiveness of the BAPL/CCP waste characterization processes for retrievably stored remote handled (RH) Summary Category Group (SCG) S5000 debris waste, relative to 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 BAPL/CCP standard operating procedures for characterization of the waste category listed above (hardcopy and electronic)
- Three Conditions Adverse to Quality (CAQs), deficiencies that were Corrected During the Audit (CDA)
- Objective evidence examined during the audit:
  - General information
  - Acceptable knowledge
  - Headspace gas sampling
  - Visual examination

NMED observed the audit on April 24-26, 2012. 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 that there were three CAQs resulting in deficiencies that were CDAs.

- The title of an Acceptable Knowledge (AK) source document did not reflect the title listed in Section 9.0 of the AK Summary Report.
- In the Headspace Gas Summary for the RH Lot 1 BT-T001, the Site Project Manager (SPM) failed to sign on three pages.
- An incorrect year was recorded on Attachment 7 of the Shipping BDR BAR11001.

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 BAPL/CCP has implemented the applicable characterization requirements of the WAP. Therefore, NMED approves the Permittee's Final Audit Report for BAPL/CCP Audit A-12-10 for certification of S5000 debris RH waste, and amends Audit Report A-11-12 issued by NMED on August 23, 2011 to include only this waste form and processes evaluated by this final audit.

This Audit Report approval is of the broad programmatic implementation of waste characterization requirements at BAPL/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.



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