



FW: Scope for EPA's Continued Compliance Inspection at AMWTP scheduled for Oct 29-Nov 1

Maestas, Ricardo, NMENV

Sent: Monday, November 26, 2012 2:50 PM

To: Allen, Pam, NMENV

Attachments: AMWTP Continued Compliance~1.pdf (17 KB)

October WIPP file

Email and attachment.

From: Holmes, Steve, NMENV

Sent: Thursday, October 04, 2012 10:49 AM

To: Kliphuis, Trais, NMENV; Maestas, Ricardo, NMENV

Subject: FW: Scope for EPA's Continued Compliance Inspection at AMWTP scheduled for Oct 29-Nov 1

EPA Inspection at AMWTP

From: Rajani Joglekar [<mailto:Joglekar.Rajani@epamail.epa.gov>]

Sent: Thursday, October 04, 2012 10:32 AM

To: conniewalk@aol.com; Holmes, Steve, NMENV; craig.halverson@deq.idaho.gov; bruce.larue@deq.idaho.gov

Subject: Fw: Scope for EPA's Continued Compliance Inspection at AMWTP scheduled for Oct 29-Nov 1

----- Forwarded by Rajani Joglekar/DC/USEPAUS on 10/04/2012 12:27 PM -----

From: Rajani Joglekar/DC/USEPAUS

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Date: 10/04/2012 12:24 PM

Subject: Scope for EPA's Continued Compliance Inspection at AMWTP scheduled for Oct 29-Nov 1

Attached is our inspection scope. We will have our pre-inspection conference call on Wednesday, Oct 18 (see the attachment for details).

121013



Scope of EPA's Continued Compliance Inspection of the Advanced Mixed Waste Treatment Project For Contact-Handled TRU Waste

DOE Site: Advanced Mixed Waste Treatment Project (AMWTP)

Organizations Notified: Department of Energy – Carlsbad Field Office
Idaho Department of Environmental Quality
New Mexico Environment Department

Evaluation Dates: October 30 – November 1, 2012

Evaluation Schedule:	Tuesday 8:00 am	Kick-Off Meeting*
	Tuesday 8:30 am – 4:00 pm	Conduct Inspection
	Wednesday 8:00 am – 4:00 pm	Conduct Inspection
	Thursday 8:00 am – 12:00 pm	Conduct Inspection
	Thursday 2:00 pm	Close-Out Meeting*

* With CBFO National TRU Program staff, and AMWTP technical leads

EPA Evaluation Team: Ms. Rajani Joglekar, EPA Lead Inspector
Mr. Ed Feltcorn, EPA Inspector
Mr. Patrick Kelly, EPA Support Contractor (SC&A)
Ms. Connie Walker, EPA Support Contractor (SC&A)
Ms. Dorothy Gill, EPA Support Contractor (SC&A)

Evaluation Scope:

EPA will conduct a continued compliance inspection of waste characterization activities at AMWTP, focusing on acceptable knowledge (AK), nondestructive assay (NDA), and Real time Radiography/Visual Examination (RTR/VE). EPA will conduct this inspection in accordance with 40 CFR 194.8(b) to evaluate the adequacy, implementation, and effectiveness of the technical processes implemented by AMWTP for characterizing contact-handled (CH) transuranic (TRU) waste.

EPA is in the process of evaluating AMWTP's two Tier 1 (T1) change requests that include debris wastes from (1) the Argonne National Laboratory-East (ANLE) and, (2) Materials and Fuel Complex (MFC) at the Idaho National Laboratory. During this continued compliance inspection, EPA may evaluate components of AK, NDA and RTR/VE specific to these T1 requests to verify adequacy of implementation. Early during this inspection, EPA will inform AMWTP which components specific to the two T1 change requests EPA intends to evaluate and request relevant documents.

Documentation:

Recently, EPA received AMWTP's WIPP Procedure List dated August 28, 2012. From that list EPA has selected AK, NDA and RTR/VE documents listed in Table 1, below, which EPA must have no later than Monday, Oct 15, 2012. Additionally, EPA requests the following items to support this continued compliance evaluation:

- A list of NDA, RTR and VE Batch Data Reports (BDRs) and 55-gallon drums that have been promoted through project level review and the availability to examine written and visual records for all BDRs
- A list of qualified personnel (operators, expert analysts and subject matter experts) and their qualification packages for NDA, RTR and VE (current List of Qualified Individuals or LOQI)
- A list of the items contained in the RTR qualification container

Table 1, AMWTP Documents for EPA Inspection

<u>Document No.</u>	<u>Title</u>	<u>Revision</u>
INST-FOI-01	In-Plant Drum Assay Operations	25
INST-FOI-17	Facility Visual Examination Operations	25
INST-OI-12	Real-Time Radiography Operations (Drum)	49
INST-OI-14	Drum Assay Operations	31
INST-OI-34	Non-Facility Visual Examination Operations	27
INST-OI-81	Real-Time Radiography Operations (For WIPP Certification of Boxes)	10
MP-TRUW-8.1	Certification Plan for INL Transuranic Waste	22
INST-TRUW-8.1.1	Drum Assay Post-Maintenance Calibration and Verification	11
MP-TRUW-8.5	TRU Waste Certification	28
MP-TRUW-8.8	Level I Data Validation	32
MP-TRUW-8.9	Level II Data Validation	24
MP-TRUW-8.11	Data Reconciliation	23
MP-TRUW-8.12	Waste Receipt and Shipping Inspection	22
MP-TRUW-8.13	Collection, Review, and Management of Acceptable Knowledge Documentation	24
MP-TRUW-8.14	Preparation of Waste Stream Profile Forms	12

MP-TRUW-8.26	Reports to Management	5
MP-TRUW-8.34	WIPP Sample Transfers	8
CI-IDA-NDA-0035	Calibration Verification & Confirmation Procedure for the Integrated Waste Assay System (IWAS) at AMWTP, Canberra Industries	3
RPT-TRUW-03	Drum Assay Technical Review Report	8
RPT-TRUW-83	Acceptable Knowledge Summary of Supercompacted Debris Waste (BN510.1)	2

Pre-Evaluation Conference Call:

A conference call between EPA, CBFO and AMWTP staff will be held on Wednesday, October 17, 2012, at 1:00 PM, to review the scope of EPA's inspection and identify additional document needs. The telephone number for the call is 1-866-299-3188, and the participant code is 2023439462#.

Logistics:

- A pre-evaluation conference/Kick-Off Meeting will be held Tuesday, October 30, 2012 at 8:30 am at a location designated by AMWTP.
- A post-evaluation EPA briefing/Close-Out Meeting will be held Thursday, November 1, 2012, at 2:00 pm for this evaluation at a location designated by AMWTP.

CBFO QA staff is invited to send observers to this activity.