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**Department of Energy**  
Carlsbad Field Office  
P. O. Box 3090  
Carlsbad, New Mexico 88221  
MAR 12 2013



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

**Subject:** Transmittal of the Audit Plan and Notification of Assigned Auditors for  
CBFO Audit A-13-12 of the Oak Ridge National Laboratory Central  
Characterization Project

Dear Mr. Kieling:

This letter transmits the audit plan for Carlsbad Field Office (CBFO) Recertification Audit A-13-12 of the Oak Ridge National Laboratory Central Characterization Project transuranic waste characterization activities. The audit will be conducted as required by the Waste Isolation Pilot Plant Hazardous Waste Facility Permit (HWFP), and will take place at the Skeen-Whitlock Building in Carlsbad, New Mexico. The audit plan identifies the audit team members as required by the HWFP. The audit is scheduled to take place April 23–25, 2013.

The New Mexico Environment Department (NMED) HWFP requires that the U.S. Department of Energy (DOE) conduct audits of each site prior to certifying that the site meets the waste characterization requirements for shipment of waste to the Waste Isolation Pilot Plant (WIPP). In accordance with Attachment C6 of the HWFP, audits must be performed at least annually after the initial audit to determine continued compliance with the HWFP Waste Analysis Plan. In a letter dated March 2, 2012, from John E. Kieling, Acting Chief, NMED Hazardous Waste Bureau, to Jose Franco, Manager, Carlsbad Field Office, NMED clarified that DOE must continue to perform annual audits of the ORNL/CCP characterization activities, and further directed: "If DOE cannot determine that the ORNL/CCP meets the requirements in Section 2.3.2.1 of the Permit, the Permittees shall not manage, store, or dispose waste from ORNL at WIPP, as required by Section 2.3.2 of the Permit. Further, once waste characterization operations resume at ORNL, DOE must conduct a full site-specific audit at ORNL before waste shipments can be sent from ORNL to WIPP."

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with 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 fines and imprisonment for knowing violations.



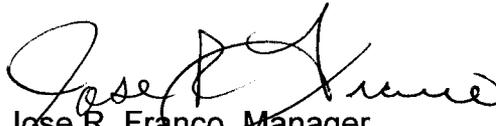
Mr. John E. Kieling

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MAR 12 2013

If you have any questions, please contact Dennis Miehl at (575) 234-7491.

Sincerely,

  
Jose R. Franco, Manager  
Carlsbad Field Office

Enclosure

cc: w/enclosure  
M. Navarrete, CBFO \* ED  
D. Miehl, CBFO ED  
J. R. Stroble, CBFO ED  
G. Basabilvazo, CBFO ED  
T. Morgan, CBFO ED  
M. Pinzel, CBFO ED  
N. Castaneda, CBFO ED  
S. McCauslin, CBFO ED  
T. Kliphuis, NMED ED  
S. Holmes, NMED ED  
R. Maestas, NMED ED  
P. Martinez, CTAC ED  
WIPP Operating Record ED  
CBFO QA File  
CBFO M&RC  
\*ED denotes electronic distribution

**CARLSBAD FIELD OFFICE  
REVISED AUDIT PLAN**

**Audit Number:** A-13-12

**Organization to be Audited:** Oak Ridge National Laboratory (ORNL), Nuclear Waste Partnership LLC (NWP) Central Characterization Program (CCP)

**Organizations to be Notified:** ORNL  
NWP  
New Mexico Environment Department (NMED)  
Defense Nuclear Facilities Safety Board  
U.S. Environmental Protection Agency (EPA)

**Date and Location:** April 23 – 25, 2013  
Carlsbad, New Mexico

**Audit Team:** Porf Martinez      Audit Team Leader, CBFO Technical Assistance Contractor (CTAC)

**Audit Scope:**

The audit team will evaluate the adequacy, implementation, and effectiveness of the technical and quality assurance (QA) activities performed by NWP CCP at ORNL for characterization and certification of contact-handled Summary Category Groups (SCGs) S4000 soils waste and S5000 debris waste, and remote-handled SCG S5000 debris waste.

CCP operations at the ORNL have been discontinued and no transuranic (TRU) waste characterization activities have been performed at the ORNL since the previous recertification audit.

The audit team will evaluate documentation in support of TRU waste characterization activities performed at ORNL from the date of the previous recertification audit (A-12-08, conducted March 27-29, 2012), complete applicable C6 checklists, and include objective evidence with the audit report.

The audit will be performed in the Skeen-Whitlock Building in Carlsbad, New Mexico. See the attached "Processes and Equipment to be Reviewed During Audit A-13-12 of ORNL/CCP" for additional details.

**Governing Documents/Requirements:**

Evaluation of the overall program adequacy and effectiveness of ORNL/CCP documents will be based on the current revisions of the following documents:

- *CBFO Quality Assurance Program Document, DOE/CBFO-94-1012*

- Hazardous Waste Facility Permit, Waste Isolation Pilot Plant, EPA No. NM4890139088-TSDF, the New Mexico Environment Department
- *Transuranic Waste Acceptance Criteria for the Waste Isolation Pilot Plant*, DOE/WIPP-02-3122
- *Remote-Handled TRU Waste Characterization Program Implementation Plan*, DOE/WIPP-02-3214

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

- *CCP Transuranic Waste Characterization Quality Assurance Project Plan*, CCP-PO-001
- *CCP Transuranic Waste Certification Plan*, CCP-PO-002
- 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

**Quality Assurance**

The following general areas from section C6-1 of the HWFP:

- Nonconformances
- Personnel Qualification and Training
- Records

**Technical Activities**

- Generator and Project Level Data Validation & Verification
- Acceptable Knowledge
- Real-time Radiography
- Visual Examination
- Headspace Gas Sampling
- Nondestructive Assay
- Radiological Characterization (dose-to-curie)
- Waste Certification (e.g., Waste Stream Profile Form)
- WIPP Waste Information System/Waste Data System

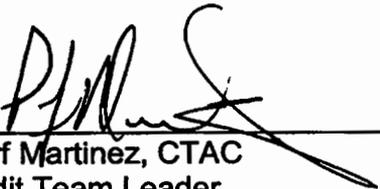
**Schedule of Audit Activities:**

A pre-audit conference is scheduled for Tuesday, April 23, 2013, at 8:00 a.m.

If needed, the audit team leader will conduct a management briefing with appropriate ORNL and CCP management Wednesday, April 24, and Thursday, April 25, 2013, at 8:30 a.m.

A post-audit conference is scheduled for Thursday, April 25, 2013, at 3:00 p.m.

All meetings will take place at the designated locations at the Skeen-Whitlock Building in Carlsbad, New Mexico.

Prepared by:   
Porf Martinez, CTAC  
Audit Team Leader

Date: 3/8/13

Concurrence:   
Dennis S. Miehl, CBFO  
Acting Quality Assurance Director

Date: 3-8-13

**Processes and Equipment to be Audited During Audit A-13-12 of the ORNL/CCP**

WIPP #	Process/Equipment Description	Applicable to the Following Waste Streams/Groups of Waste Streams	Currently Approved by NMED	Currently Approved by EPA
<b>PREVIOUSLY APPROVED PROCESSES OR EQUIPMENT</b>				
Contact-handled (CH) S4000 soils waste and S5000 debris waste				
N/A	Acceptable Knowledge Procedure – CCP-TP-002 and CCP-TP-005	Soils (S4000) Debris (S5000)	YES	YES
16RR1	Real-Time Radiography Mobile Characterization System (MCS) RTR # 6 – 55-gallon drums Procedure – CCP-TP-165 and CCP-TP-053	Soils (S4000) Debris (S5000)	NO	YES
N/A	Headspace Gas Sampling Procedure – CCP-TP-082 and CCP-TP-093	Debris (S5000)	NO	YES
N/A	Data Generation and Project Level Validation & Verification (V&V) Procedure – CCP-TP-001	Soils (S4000) Debris (S5000)	YES	YES
N/A	WIPP Waste Information System (WWIS)/Waste Data System (WDS) Procedure – CCP-TP-030 and CCP-TP-033	Soils (S4000) Debris (S5000)	YES	YES
16IQ1	NDA IQ3 Procedures: CCP-TP-046, <i>CCP Mobile IQ3 System Calibration Procedure</i> CCP-TP-047, <i>CCP Mobile IQ3 Gamma Scanner Operation</i> CCP-TP-048, <i>CCP Mobile IQ3 System Data Reviewing, Validating, and Reporting Procedure</i>	Soils (S4000) Debris (S5000)	N/A	YES

**Processes and Equipment to be Audited During Audit A-13-12 of the ORNL/CCP**

<b>WIPP #</b>	<b>Process/Equipment Description</b>	<b>Applicable to the Following Waste Streams/Groups of Waste Streams</b>	<b>Currently Approved by NMED</b>	<b>Currently Approved by EPA</b>
16VE1	Visual Examination Procedure: CCP-TP-113, <i>CCP Standard Contact-Handled Waste Visual Examination</i>	Soils (S4000) Debris (S5000)	NO	YES
N/A	Quality Assurance	N/A	N/A	YES
<b>Remote-handled (RH) S5000 debris waste</b>				
N/A	Acceptable Knowledge Procedure – CCP-TP-002, CCP-TP-005, and CCP-TP-506	Debris (S5000)	YES	YES
N/A	Data Generation and Project Level Validation & Verification (V&V) Procedure – CCP-TP-001	Debris (S5000)	YES	YES
N/A	WIPP Waste Information System (WWIS)/Waste Data System (WDS) Procedure – CCP-TP-530	Debris (S5000)	YES	YES
16RHVE1	Visual Examination (VE) Procedure – CCP-TP-163 and CCP-TP-500	Debris (S5000)	NO	YES
16DTC1	Radiological characterization (Dose-to-Curie) Procedure - CCP-TP-504	Debris (S5000)	N/A	YES
N/A	Quality Assurance	N/A	N/A	YES

**Processes and Equipment to be Audited During Audit A-13-12 of the ORNL/CCP**

<b>WIPP #</b>	<b>Process/Equipment Description</b>	<b>Applicable to the Following Waste Streams/Groups of Waste Streams</b>	<b>Currently Approved by NMED</b>	<b>Currently Approved by EPA</b>
N/A	Headspace Gas Sampling (SUMMA®) Procedure – CCP-TP-082 and CCP-TP-093	Debris (S5000)	N/A	YES
<b>TRANSPORTATION</b>				
16HG2	Flammable Gas Analysis HSG-FGA-04 Procedure: DOE/WIPP-06-3345	Soils (S4000) Debris (S5000)	N/A	YES
<b>DEACTIVATED EQUIPMENT</b>				
16SG1	DWAS/IPAN/SGS-01  CCP-TP-169, <i>CCP Operating the Mobile SGS</i> CCP-TP-172, <i>CCP Calibrating the Mobile Segmented Gamma Scanner</i> CCP-TP-166, <i>CCP DWAS IPAN Operations</i> CCP-TP-167, <i>CCP Drum Waste Assay System Imaging Passive/Active Neutron Calibration</i> CCP-TP-168, <i>CCP DWAS IPAN/SGS Data Generation Level Validation</i>	Soils (S4000) Debris (S5000)	N/A	YES