



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: CBFO Recertification Audits for ORNL/CCP and Hanford/CCP

Dear Mr. Kieling:

The Carlsbad Field Office (CBFO) is preparing to conduct annual recertification audits of the Oak Ridge National Laboratory Central Characterization Program (ORNL/CCP) on April 23-25, 2013, and the Hanford Site CCP (Hanford/CCP) on May 14-16, 2013. Transuranic (TRU) waste characterization activities at these sites have been suspended, as reported in recertification audit reports A-12-08 (ORNL/CCP) and A-12-11 (Hanford/CCP) for audits completed in calendar year 2012. The CBFO Office of Quality Assurance has verified that no TRU waste characterization activities have been performed since the last recertification audit conducted at each site.

In a letter dated March 2, 2012, you conveyed New Mexico Environment Department (NMED) expectations for the CBFO to comply with the requirement of performing annual recertification audits at sites that have temporarily suspended TRU waste characterization operations. In accordance with NMED requirements, the CBFO will conduct recertification audits for ORNL/CCP and Hanford/CCP in Carlsbad, New Mexico. Audit plans will be submitted 30 days prior to the audit, as required. Permit Attachment C6 checklists will be completed with "N/A" designations indicating that no waste characterization activities have been performed since the previous audits; thus, no objective evidence will be submitted with the audit reports. An audit report will be issued for each site concluding that the results of the audit were indeterminate due to the lack of waste characterization activities.

Once waste characterization operations resume at the ORNL and Hanford sites, the CBFO will conduct full site-specific audits at both sites before waste shipments can resume to the Waste Isolation Pilot Plant.

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

Sincerely,


Jose R. Franco, Manager
Carlsbad Field Office



Mr. John E. Kieling

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cc:

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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

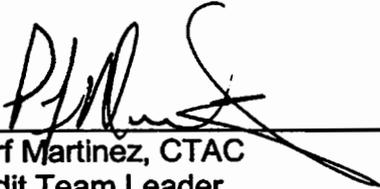
Schedule of Audit Activities:

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
PREVIOUSLY APPROVED PROCESSES OR EQUIPMENT				
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

WIPP #	Process/Equipment Description	Applicable to the Following Waste Streams/Groups of Waste Streams	Currently Approved by NMED	Currently Approved by EPA
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
Remote-handled (RH) S5000 debris waste				
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

WIPP #	Process/Equipment Description	Applicable to the Following Waste Streams/Groups of Waste Streams	Currently Approved by NMED	Currently Approved by EPA
N/A	Headspace Gas Sampling (SUMMA®) Procedure – CCP-TP-082 and CCP-TP-093	Debris (S5000)	N/A	YES
TRANSPORTATION				
16HG2	Flammable Gas Analysis HSG-FGA-04 Procedure: DOE/WIPP-06-3345	Soils (S4000) Debris (S5000)	N/A	YES
DEACTIVATED EQUIPMENT				
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