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



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

**Subject:** Response to NMED Letter Dated January 18, 2013, Regarding NMED Review of Final Reports for Audits A-12-12 and A-12-16

Dear Mr. Kieling:

In your letter dated January 18, 2013, the New Mexico Environment Department (NMED) requested additional information regarding Observations made during two audits: Audit A-12-12 of the Los Alamos National Laboratory/Central Characterization Project (LANL/CCP), and Audit A-12-16 of the Argonne National Laboratory/Central Characterization Project (ANL/CCP).

Your letter specifically requested additional information regarding Observation two from Audit A-12-12 and Observation one from Audit A-12-16. Both Observations were directed at management inattention to detail and failure to follow established procedures. In each case, the Observations were correlated with two previous Corrective Action Reports (CARs), CAR 12-026 and CAR 12-027, written on the Central Characterization Project (CCP) at the Idaho National Laboratory (INL/CCP). These two previous CARs also dealt with management inattention to detail and failure to follow established procedures. These Observations documented similar concerns as noted in CARs 12-026 and 12-027 and would have been addressed under the extent-of-conditions within the deficiency evaluations of these CARs.

Upon review of CARs 12-026 and 12-027 (primarily CAR 12-027), it has been determined that the extent-of-condition did not adequately address each identified management-related concern in the LANL/CCP and ANL/CCP recertification audits. While the overarching condition identified of management inattention to detail was broadly addressed to minimize future concerns of this type, the individual concerns identified in the two Observations were not documented as being specifically addressed. Accordingly, the Carlsbad Field Office is now in the process of evaluating the additional information and documented Observations raised in other recent recertification audits to determine appropriateness of categorization and whether additional corrective action is necessary.



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Mr. John E. Kieling

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For the two Observations identified at the LANL/CCP and ANL/CCP and questioned in your letter, the evaluations have determined that none of the concerns resulted in any non-compliances with the Hazardous Waste Facility Permit Waste Analysis Plan (WAP). The following table displays the ANL and LANL WAP applicability determinations.

If you need any additional information, please contact Mr. Martin Navarrete, Senior Quality Assurance Specialist, at (575) 234-7483.

Sincerely,



Jose R. Franco, Manager  
Carlsbad Field Office

Enclosure

cc: w/enclosure

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J. Harvill, CTAC	ED
R. Allen, CTAC	ED
G. Knox, CTAC	ED
M. Mager, CTAC	ED
G. White, CTAC	ED
WIPP Operating Record	ED
CBFO QA File	
CBFO M&RC	

\*ED denotes electronic distribution

**AUDIT A-12-12 July 24 - 26, 2012  
LANL/CCP Recertification Audit**

<b>WAP Related Yes/No</b>	<b>Description of Concern</b>	<b>Requirements Comments</b>
Not WAP Related	<p>NCR-LANL-0972 was incorrectly recorded on RTR Data Sheet for Container No. S802940 on BDR No. LA-RTR2-12-0066.</p> <p><b>Rationale:</b> This concern does not violate a specific WAP requirement, therefore it is not WAP related. This is a QA Records issue regarding record accuracy.</p> <p>* Originally issued as Observation 2, item 1. This concern is being re-evaluated for accuracy.</p>	<p>CCP-TP-053, Rev. 11, <i>CCP Standard Real-Time Radiography (RTR) Inspection Procedure</i>, Attachment 3, Question #10 asks the ITR: "Is all the data recorded clearly, legibly, and accurately?"</p>
Not WAP Related	<p>Four sample selection container replacement memoranda were written incorrectly (CP:11:1802, CP:11:1803, CP:11:1804 and CP:11:1805). The memoranda stated that the random selections were for solids when they were actually for headspace gas.</p> <p><b>Rationale:</b> This concern does not violate a specific WAP requirement, therefore it is not WAP related. This is a QA Records issue regarding record accuracy.</p> <p>* Originally issued as Observation 2, item 2. This concern is being re-evaluated for accuracy.</p>	<p>CCP-TP-162, Rev. 1, Section 4.4.5 [B], "IF sampling cannot be performed on a selected container or containers THEN prepare a Sample Selection Container Replacement Memorandum to include, as a minimum, the following information:..."</p>
Not WAP Related	<p>In BDRs 2LANDA0832 and 3LANDA0063, question 19 of the CCP SPM Nondestructive Assay Project Level Validation Checklist and Summary was answered "N/A." However, no justification was recorded in the comments/qualifier section as required.</p> <p><b>Rationale:</b> This concern does not violate a specific WAP requirement, therefore it is not WAP related. This is a Nondestructive Assay issue and is not in the purview of NMED HWFP and is also a QA Records issue regarding record completeness.</p> <p>* Originally issued as Observation 2, item 3. This concern is being re-evaluated for accuracy.</p>	<p>CCP-TP-001, Revision 19, Section 4.2.10 states, "IF any question is answered NA or NO, THEN provide justification in the Comments/Qualifiers Section of the appropriate SPM checklist, as applicable."</p>

**AUDIT A-12-16 August 29 - 30, 2012  
ANL/CCP Recertification Audit**

<b>WAP Related Yes/No</b>	<b>Description of Concern</b>	<b>Requirements Comments</b>
Not WAP Related	<p>Although the SPM review was completed for BDR RHANLDG12004, it was completed and documented using CCP-TP-513, Attachment 3, Dimensional/ Gravimetric Independent Technical Reviewer (ITR) Checklist. The information and questions on the two checklists are the same; however, the checklists are not interchangeable.</p> <p><b>Rationale:</b> This concern does not violate a specific WAP requirement, therefore it is not WAP related. This is a QA Records issue regarding record accuracy.</p> <p>* Originally issued as Observation 1, item 1. This concern is being re-evaluated for accuracy.</p>	<p>CCP-TP-513, Rev 1, <i>CCP Procedure for Dimensional or Gravimetric Measurements for Radiological Characterization of Remote-Handled Transuranic Waste</i>, Section 3.4.1 states "Reviews and approves the Radiological Documentation Package and completes Attachments 4 and 6, SPM Checklist."</p>
Not WAP Related	<p>During the review of BDR ANLRHVE12008, it was discovered that the VE operators listed items in the Waste Description section of Attachment 1, Visual Examination Data Form, that are not identified in the AK Summary Report (CCP-AK-ANLE-500, Rev. 10). The VE operators listed the subject items as "Clearboy" containers; however, the AK Summary Report only lists container descriptors for these containers as Chemical Waste Processing Containers (CWPCs), carboys, and liquid bulking containers (LBCs).</p> <p>Additionally, the audit team found two instances of different Waste Material Parameters (WMPs) being recorded for the "Clearboy" containers on Attachment 1, Visual Examination Data Form, for container RW 48260. Further interviews with VE personnel disclosed that these containers should be listed as "Plastics (P)."</p> <p><b>Rationale:</b> This concern does not violate a specific WAP requirement, therefore it is not WAP related. This is a QA Documents issue regarding document accuracy.</p> <p>* Originally issued as Observation 1, item 2. This concern is being re-evaluated for accuracy.</p>	<p>CCP-TP-500, Rev 11, <i>CCP Remote-Handled Waste Visual Examination</i>:</p> <ul style="list-style-type: none"> <li>• Section 1.1 states, "VE verifies the physical waste form, confirms the Waste Stream Description and Waste Matrix Codes provided by Acceptable Knowledge (AK)..."</li> <li>• Section 4.1.2 [B] &amp; [B.4] states, "...record the following in the Initial Container fields on a separate Attachment 1 for each small container: <ul style="list-style-type: none"> <li>▪ Waste Stream as listed in the AK Summary Report."</li> </ul> </li> </ul>
Not WAP Related	<p>SPM checklist for VE BDR RHANLVE100015 was not complete. For Question 3, "Is the BDR complete (appropriately filled in forms for each container)?" neither "No" nor "Yes" was checked.</p> <p><b>Rationale:</b> This concern does not violate a specific WAP requirement, therefore it is not WAP related. This is a QA Records issue regarding record completeness.</p> <p>* Originally issued as Observation 1, item 3. This concern is being re-evaluated for accuracy.</p>	<p>CCP-TP-500, Rev. 9, <i>CCP Remote-Handled Waste Visual Examination</i>, section .4.4 - SPM:  4.4.3 "Review the BDR to the criteria in Attachment 3, and document on Attachment 3"  4.4.5 "Forward the completed Attachment 3 to the Facility Records Custodian"</p>