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# memorandum

 Carlsbad Field Office  
 Carlsbad, New Mexico 88221

DATE: APR 12 2013


 REPLY TO  
 ATTN OF: CBFO:NTP:JRS:PG:13-0458:UFC 5900.00

SUBJECT: AMWTP Project Expansion to Recertification Audit A-12-03 to Include the EPA Tier 1 Approvals Adding ANL-E and MFC Waste and Surveillance S-13-21 AMWTP Compacted Waste Process for CH SCG S5000 Debris Waste

TO: Benjamin Roberts, DOE-ID

The Carlsbad Field Office (CBFO) is expanding the certification of the Idaho National Laboratory (INL) Advanced Mixed Waste Treatment Project's (AMWTP) contact-handled (CH) certification memorandum CBFO:NTP:NC:GL:12-0612 dated September 17, 2012. This expansion reflects the following at the AMWTP:

- The U.S. Environmental Protection Agency (EPA) inspection report dated January 29, 2013, (Docket No. A-98-49, II-A4-169) for the Tier 1 changes to include the CH homogeneous solids (S3000) and CH debris (S5000) from the Argonne National Laboratory-East (ANL-E); and the CH debris (S5000) from the INL Materials and Fuels Complex (MFC). The EPA provided approval via email on February 27, 2013;
- The Surveillance S-13-21 evaluating the use of the Supercompactor to breach prohibited containers and remove prohibited items from 55-gallon drums of CH S5000 (debris) waste through the compaction process.

The CBFO completed the annual recertification audit A-12-03 of the AMWTP's transuranic (TRU) waste characterization activities at the INL conducted November 1-3, 2011. The characterization and certification activities were determined to be adequate, satisfactorily implemented, and effective.

The audit team determined that the AMWTP TRU program was in compliance with the *Waste Analysis Plan (WAP)* of the Waste Isolation Pilot Plant (WIPP) Hazardous Waste Facility Permit (HWFP), the *CBFO Quality Assurance Program Document (QAPD)*, and the *TRU Waste Acceptance Criteria for the Waste Isolation Pilot Plant (WIPP WAC)*. The audit team determined that the procedures/documents were effectively implemented.

Based on the results of the CBFO Audits/Surveillances (See Attachment 1), and conditions and limitations provided by the New Mexico Environment Department (NMED) and the EPA, the CBFO is authorizing the AMWTP to include the CH homogeneous solids (S3000) and CH debris (S5000) from the ANL-E; the CH debris (S5000) from the MFC; and the process for the use of the Supercompactor to breach prohibited containers and remove prohibited items from 55-gallon drums of CH debris (S5000) waste through the compaction process (i.e., Surveillance S-13-21). The CBFO grants continued authority at the AMWTP for TRU waste characterization and certification activities as identified in Table 1, Page 4 of this memorandum.

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Mr. Benjamin Roberts

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TRU waste characterization and certification activities, using significantly revised or new processes, procedures, or systems must be evaluated by the CBFO prior to their implementation. Included in this memorandum are the following attachments:

- *Attachment 1* describes the certification program status;
- *Attachment 2* contains the list of processes/equipment from Table 1 of this memorandum certified at the site;
- *Attachment 3* contains the list of certified procedures/documents; and
- *Attachment 4* describes specific waste characterization process elements that must be reported to the EPA. These process elements are identified as Tier 1 changes and Tier 2 changes. The AMWTP shall not ship for disposal at the WIPP any wastes affected by a Tier 1 process element change without prior CBFO approval, and the AMWTP shall report Tier 2 changes to CBFO on a quarterly basis.

If you have any questions, please contact the Director of the Office of National TRU Program, Mr. J.R. Stroble, at (575) 234-7313.

  
Jose R. Franco, Manager  
Carlsbad Field Office

Attachments (4)