



Department of Energy
Carlsbad Field Office
P. O. Box 3090
Carlsbad, New Mexico 88221
APR 15 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: Audit Plan and Notification of Assigned Auditors for CBFO Audit A-13-15 of the Hanford Central Characterization Program

Dear Mr. Kieling:

This letter transmits the audit plan for Carlsbad Field Office (CBFO) Recertification Audit A-13-15 of the Hanford Central Characterization Project transuranic waste characterization activities. The audit will be conducted as required by the Waste Isolation Pilot Plant Hazardous Waste Facility Permit, and will take place at the Skeen-Whitlock Building in Carlsbad, New Mexico, May 14 – 16, 2013. The audit plan identifies the audit team members as required by the Permit.

The New Mexico Environment Department (NMED) Hazardous Waste Facility Permit (Permit) 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 Permit, audits must be performed at least annually after the initial audit to determine continued compliance with the Permit Waste Analysis Plan. In a letter dated March 2, 2012, from John E. Kieling, Acting Chief, NMED Hazardous Waste Bureau, to Jose Franco, Manager, CBFO, NMED clarified that DOE must continue to perform annual audits of Hanford/CCP characterization activities, and further directed: "if DOE cannot determine that the Hanford/CCP meets the requirements in Section 2.3.2.1 of the Permit, the Permittees shall not manage, store, or dispose waste from Hanford at WIPP, as required by 2.3.2 of the Permit. Further, once waste characterization operations resume at Hanford, DOE must conduct a full site-specific audit at Hanford before waste shipments can be sent from Hanford to WIPP."



John E. Kieling

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Should you have any questions concerning this notification, please contact Dennis S. Miehl, Acting Director, Office of Quality Assurance at (575) 234-7491.

Sincerely,



Jose R. Franco
Manager, Carlsbad Field Office

Enclosure

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

*ED denotes electronic distribution

CARLSBAD FIELD OFFICE

Audit Number: A-13-15

Organization to be Audited: Hanford, Nuclear Waste Partnership LLC (NWP)
Central Characterization Program (CCP)

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

Date and Location: May 14 – 16, 2013
Carlsbad, New Mexico

Audit Team: Martin P. Navarrete Carlsbad Field Office (CBFO)
Management Representative

Berry D. Pace 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 Hanford for characterization and certification of contact-handled (CH) Summary Category Groups (SCGs) S3000 homogeneous solids and S5000 debris waste.

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

The audit team will evaluate available documentation in support of TRU waste characterization activities performed at Hanford from the date of the previous recertification audit (A-12-11, conducted May 15 – 16, 2012), complete applicable C6 checklists, and review objective evidence.

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-13-15 of Hanford/CCP" for additional details.

Governing Documents/Requirements:

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

- *CBFO Quality Assurance Program Document, DOE/CBFO-94-1012*
- *Waste Isolation Pilot Plant Hazardous Waste Facility Permit NM4890139088-TSDF*
- *Transuranic Waste Acceptance Criteria for the Waste Isolation Pilot Plant, DOE/WIPP-02-3122*

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

General areas from section C6-1 of the Permit:

- Nonconformances
- Personnel Qualification and Training
- Records

Technical Activities

- Generator and Project-level Data Validation and 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, May 14, 2013, at 8:00 a.m.

If needed, the audit team leader will conduct a management briefing with appropriate Hanford/CCP management Wednesday, May 15, 2013, and Thursday, May 16, 2013, at 8:30 a.m.

A post-audit conference is scheduled for Thursday, May 16, 2013, at 3:00 p.m.

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

Prepared by: 
Berry D. Pace, CTAC
Audit Team Leader

Date: 4/10/13

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

Date: 4-10-13

Processes and Equipment to be Audited During Audit A-13-15 of Hanford/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				
18GEAA	Radiological Characterization by NDA – Hanford Gamma Energy Assay System Unit A – 55-gallon drums Procedure – CCP-TP-071	Debris (S5000) Solids (S3000)	N/A	YES
18GEAB	Radiological Characterization by NDA – Hanford Gamma Energy Assay System Unit B – 55-gallon drums Procedure – CCP-TP-071	Debris (S5000) Solids (S3000)	N/A	YES
18SHENC	Super High Efficiency Neutron Counter "A" Platform (SHENC) Procedure – CCP-TP-137	Debris (S5000) Solids (S3000)	N/A	YES
18RTRA	Real-Time Radiography System – 55-gallon drums Procedure – CCP-TP-053	Debris (S5000) Solids (S3000)	YES	YES
18RTRB	Real-Time Radiography System – 55-gallon drums Procedure – CCP-TP-053	Debris (S5000) Solids (S3000)	YES	YES
18HERTR	High-Energy Real-Time Radiography System – 55-/85-gallon drums and SWBs Procedure – CCP-TP-053	Debris (S5000) Solids (S3000)	YES	YES

Processes and Equipment to be Audited During Audit A-13-15 of Hanford/CCP

WIPP #	Process/Equipment Description	Applicable to the Following Waste Streams/Groups of Waste Streams	Currently Approved by NMED	Currently Approved by EPA
18RLVE	Visual Examination Process – SWB and 55-gallon drums Procedure – CCP-TP-113	Debris (S5000)	YES	YES
N/A	Solids Sampling and Analysis ¹	Solids (S3000)	YES	YES
N/A	Headspace Gas Sampling ² Procedure – CCP-TP-093	Debris (S5000)	YES	YES
N/A	Acceptable Knowledge Procedure – CCP-TP-002 and CCP-TP-005	Debris (S5000) Solids (S3000)	YES	YES
N/A	Data Generation and Project Level Validation & Verification (V&V) Procedure – CCP-TP-001	Debris (S5000) Solids (S3000)	YES	YES
N/A	WIPP Waste Information System (WWIS)/Waste Data System (WDS) Procedure – CCP-TP-030	Debris (S5000) Solids (S3000)	YES	YES
N/A	Quality Assurance	Debris (S5000) Solids (S3000)	N/A	YES

¹ Solids Sampling and Analysis - Coring is performed by AMWTP, core samples are analyzed by INL/CCP Labs

² Headspace Gas Sample Analysis is performed by INL/CCP Labs