

RE: CBFO QA Call

Kliphuis, Trais, NMENV

Sent: Tuesday, April 16, 2013 11:08 AM

To: Maestas, Ricardo, NMENV; Holmes, Steve, NMENV

Cc: Holmes, Steve, NMENV; Allen, Pam, NMENV; Cobrain, Dave, NMENV



Ricardo and I resolved the issue discussed below with the AQ team this morning. They agreed to continue to submit the audit reports for facilities that are not seeking certification as we recommended. We are allowing them to submit abbreviated C6 lists that have a note in the beginning of each new section that states there are no responses. This would be instead of entering NA in each column and will save a lot of paper. They stated that they also intend on writing at the beginning of the report something like they are not seeking certification or approval of the report.

Please let me know if you see any problems with this approach.

-Trais

From: Maestas, Ricardo, NMENV

Sent: Thursday, April 11, 2013 2:00 PM

To: Kliphuis, Trais, NMENV; Holmes, Steve, NMENV

Cc: Maestas, Ricardo, NMENV

Subject: RE: CBFO QA Call

This is language from the March 12, 2013 letter (13-1350) from the Permittees:

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.

This from ORNL/CCP A-12-08 final audit report submitted 8/12/12:

(this audit report deemed many aspects as indeterminate and was still a full report; 35 pages)

The audit team evaluated headspace gas (HSG) sampling, real-time radiography (RTR), visual examination (VE), nondestructive assay (NDA), and dose-to-curie (D-T-C) batch data reports (BDRs), acceptable knowledge (AK) documentation, training documentation, nonconformance reports, records, logbooks, and audio/video media generated from the date of the previous audit (CBFO Recertification Audit A-11-08, February 8-10, 2011) to the July 2011 referenced timeframe. The audit team concluded that the overall adequacy of the ORNL/CCP technical and quality assurance (QA) programs was satisfactory in meeting upper-tier requirements as applicable to the audited activities. The audit team verified that for the documentation evaluated, the ORNL/CCP program for characterization and certification activities related to RH and CH SCG S5000 debris waste and CH SCG S4000 soil/gravel waste was satisfactorily implemented and effective.

Since ORNL/CCP suspended characterization activities at the ORNL, the audit team was unable to evaluate HSG sampling, RTR, VE, NDA, and D-T-C characterization activities in the field, or verify personnel and equipment were available to continue characterization activities. For this reason, the audit team was unable to determine the implementation and effectiveness of characterization procedures for HSG sampling, RTR, VE, NDA, and D-T-C; therefore, these processes were deemed indeterminate.

Again I think it would be a good idea to see what Dennis and Martin had in mind as far as a short version audit report.

As long as the required sections or topics are addressed (even if it's a one or two sentence meaningful blurb).

I believe even if most of the C6 checklist will contain "N/A" the list should be submitted as part of the final report.

From: Maestas, Ricardo, NMENV

Sent: Thursday, April 11, 2013 12:39 PM

To: Kliphuis, Trais, NMENV; Holmes, Steve, NMENV

Cc: Maestas, Ricardo, NMENV

Subject: RE: CBFO QA Call

Dennis and Martin asked if they could submit a short version audit report or something similar since there will not be much to them.

I will review past audit reports that were indeterminate to see what they included and review the specific Permit language to see what the Permit requires. (from below)

Permit language on audit reports.

C6-3 Audit Position Functions

Audits will be conducted at least annually for each site involved in the waste characterization program. Both announced and unannounced audits will address the following:

- Results of previous audits
- Changes in programs or operations
- New programs or activities being implemented
- Changes in key personnel

Annual certification audits shall address remote contact-handled (CH) and remote-handled (RH) waste characterization activities if the site has approval or is seeking approval for such wastes. At a minimum, the audit shall evaluate acceptable knowledge documentation for CH and RH waste separately by Summary Category Group, as applicable.

C6-4 Audit Conduct

... Deficiencies and observations will be documented and included as part of the final audit report. Those items that have been resolved during the audit (isolated deficiencies that do not require a root cause determination or actions to preclude recurrence), will be verified prior to the end of the audit, and the resolution will be described in the audit report.

... Corrective Action Report (CAR) and included as a part of the final audit report.

Here's the meat from C6-4:

- The audit report will be prepared, approved, and issued to the site within 30 days of the completion of the audit by DOE.
- NMED shall receive a copy of the audit report upon issuance for information purposes.



- A formal final audit report will be provided to NMED which will include WAP-related CAR resolution results and audit results that will include, as a minimum, sections describing the scope, purpose, summary of deficiencies, and observations in narrative format, completed audit checklists, audited procedures, and other applicable documents which provide evidence of WAP implementation. The report will also include an identification of the organization audited, the dates of the audit, and the requested response date.
- One copy of the formal final audit report shall be submitted to NMED in hard copy, but any additional copies may be submitted in electronic format.

The Permit requires the Permittees to address all of the above in their final audit report to the state. I don't see how they could submit a "short/ simplified" report and I don't believe I have ever seen one come in. I think we should ask for clarification on what exactly Dennis and Martin had in mind but as of right now I would advise them to err on the side of caution and submit the usual audit report format. We definitely do not want them to miss a Permit requirement.

From: Maestas, Ricardo, NMENV
Sent: Thursday, April 11, 2013 11:45 AM
To: Kliphuis, Trais, NMENV; Holmes, Steve, NMENV
Cc: Maestas, Ricardo, NMENV
Subject: CBFO QA Call

Trais,

Dennis and Martin asked if they could submit a short version audit report or something similar since there will not be much to them. I will review past audit reports that were indeterminate to see what they included and review the specific Permit language to see what the Permit requires.