




Department of Energy 
Carlsbad Field Office
P. O. Box 3090
Carlsbad, New Mexico 88221
MAY - 9 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: Revised Documents and CBFO Responses to NMED Comments on Final Report of Audit A-12-12 of the LANL/CCP

Dear Mr. Kieling:

This letter transmits the revised final audit report for Audit A-12-12, Los Alamos National Laboratory/Central Characterization Project (LANL/CCP) and Carlsbad Field Office (CBFO) responses to the New Mexico Environment Department (NMED) comments received by letter dated April 18, 2013.

Please contact Mr. Dennis Miehl, Acting Quality Assurance Director, at (575) 234-7491, should you have any questions concerning these revised documents.

Sincerely,


Jose R. Franco, Manager
Carlsbad Field Office

Enclosure



Mr. John E. Kieling

-2-

MAY - 9 2013

cc: w/o enclosure

D. Miehl, CBFO	*ED
M. Navarrete, CBFO	ED
J.R. Stroble, CBFO	ED
T. Morgan, CBFO	ED
G. Basabilvazo, CBFO	ED
N. Castaneda, CBFO	ED
T. Kliphuis, NMED	ED
S. Holmes, NMED	ED
R. Maestas, NMED	ED
C. Smith, NMED	ED
M. Mager, CTAC	ED
G. Knox, CTAC	ED

cc: w/enclosure

WIPP Operating Record	ED
CTAC QA File	
CBFO M&RC	

*ED denotes electronic distribution

Appendix A
Response to NMED Approval Letter dated April 18, 2013

**RESPONSE TO NMED COMMENTS ON THE LANL/CCP
FINAL AUDIT REPORT A-12-12**

The NMED letter dated April 18, 2013, for Final Audit Report A-12-12 included six comments related to the report and associated C6 checklists (shown here in italics). The actions taken to address the comments are provided in the following responses.

1. *The Content Map does not mention nor list the Corrective Action Reports Documentation that was included as part of the objective evidence of this audit report. A revised Content Map should be submitted.*

Response: The A-12-12 Objective Evidence Content Map was revised to include reference to Corrective Action Reports. A redline copy is included.

2. *The final audit report does not address: Results of previous audits: Changes in programs or operations; New programs or activities being implemented, changes in personnel. The audit report must be revised to address these areas as required in section C6-3 of the Permit and must be resubmitted to NMED within 90 days from receipt of this letter.*

Response: The A-12-12 final audit report has been revised to address the identified areas as required in section C6-3 of the permit. A redline copy is included.

3. *It must be noted that the internal nonconformance report, NCR-LANL-1010-12, mentioned in CBFO CAR 12-035, was closed on July 31, 2012 as documented in the CCP Closure Package for CBFO CAR 12-035 that was included as objective evidence. The status of this NCR in the final audit report would be helpful. Any information on "out-of-the ordinary" occurrences that are Permit related and fall within the scope of the audit should be discussed in the audit report. No action is necessary as this comment serves as guidance for future audit reports.(underline added)*

4. *Audit report, Section 6.3 Observations, Observation 2, Number 1, is written: "NCR-LANL-0972 was incorrectly recorded on the RTR data sheet for Container S803940 in BDR LA-RTR2-12-0066. :This should have been written as: "NCR-LANL-0972-12 was incorrectly written as NCR-LANL-0972...." No action is necessary as this comment serves as clarification.(underline added)*

5. *Question 127 of the C6 Checklist was left blank.*

Response: Question 127 of the C6-2 checklist was revised. A redline copy is included.

6. *The Permittees must make careful WAP compliance determinations that are thoroughly justified. The Permittees must expand their April 12, 2013 response to address Permit Section C3-4b(1) in regards to the concern form BDR LA-RTR2-12-0066. The Permittees must submit their expanded response to NMED within 90 days from receipt of this letter.*

RESPONSE TO NMED COMMENTS ON THE LANL/CCP
FINAL AUDIT REPORT A-12-12

Response: Review of BDR LA-RTR2-12-0066 shows that NCR-LANL-0972-12 was incorrectly identified as NCR-LANL-0972 on the RTR data sheet for Waste Container S802940 (reference comment 4) and was corrected. It is noted that the missing numbers (-12) is used by CCP to identify the year the NCR was generated and that the unique identifier of the NCR is the preceding number (0972). As the NCR is included in the BDR package, as required, and is closed properly, the BDR was processed and reviewed correctly and characterization was not affected. Traceability of the NCR was not lost. It is also noted that disposition of the NCR-LANL-0972-12 was to reject Waste Container S802940 and return the container to LANL, which was done and verified during closure of NCR-LANL-0972-12.

It is CBFOs position that this error is a QA Records issue regarding record accuracy and does not violate a specific WAP requirement; therefore it is not a WAP related issue.

Appendix B
Redlined A-12-12 Final Report