

FW: Scope for the June 4-5 ISOCS at LANL Evaluation

Maestas, Ricardo, NMENV
Sent: Thursday, June 13, 2013 7:42 AM
To: Allen, Pam, NMENV
Attachments: LANL-CCP T1 ISOCS Scope.pdf (77 KB)



WIPP file

From: Holmes, Steve, NMENV
Sent: Wednesday, May 22, 2013 2:12 PM
To: Kliphuis, Trais, NMENV; Maestas, Ricardo, NMENV; smith.coleman@state.nm.us
Cc: conniewalk@yahoo.com; Walker Connie (conniewalk@aol.com)
Subject: FW: Scope for the June 4-5 ISOCS at LANL Evaluation

All,
I don't know if you got this or not. Please make sure that Cole gets a copy.
Thank you,

From: Feltcorn, Ed [Feltcorn.Ed@epa.gov]
Sent: Wednesday, May 22, 2013 10:23 AM
To: Morgan, Thomas - DOE
Cc: Stone, Nick; Patrick Kelly; Castaneda, Norma - DOE; Site Documents - DOE; Simmons, Craig - NWP; Hall, Timothy, NMENV; Holmes, Steve, NMENV; rgogliotti@scalnc.com
Subject: Scope for the June 4-5 ISOCS at LANL Evaluation

In addition to the other items in the scope, please provide a list of assayed containers, if any, by COB Tuesday May 28th.

Thanks
Ed



**Scope of EPA's Tier 1 Change Evaluation at LANL-CCP:
Non Destructive Assay – In-Situ Object Counting System (ISOCS)**

DOE Site: Los Alamos National Laboratory – Central
Characterization Project (LANL–CCP)

Organizations Notified: Department of Energy – Carlsbad Field Office (CBFO)
New Mexico Environment Department (NMED)
Environmental Protection Agency (EPA) – Region 6

Evaluation Dates: June 4-5, 2013

Inspection Schedule: Tuesday 8:00 am – 8:30 am, Entrance Meeting*
Tuesday 8:30 am – 4:00 pm, Conduct Evaluation
Wednesday 8:00 am – Management Briefing, as needed*
Wednesday 8:30 am – 2:00 pm, Conduct Evaluations
Wednesday 3:00 pm, Close-Out Meeting*

* With LANL-CCP Management and technical leads

EPA Inspection Team: Edward Felcorn, US EPA HQ (Lead Evaluator)
Patrick Kelly, EPA Contractor, Technical Lead (SC&A)
Rose Gogliotti, EPA Contractor, Technical Evaluator
(SC&A)

Evaluation Scope:

EPA will conduct a Tier 1 evaluation in accordance with 40 CFR 194.8(b) to evaluate the adequacy, implementation, and effectiveness of technical processes implemented by LANL-CCP for using the ISOCS Nondestructive Assay (NDA) system for characterizing CH TRU waste containers.

Characterization Systems To Be Inspected:

On June 4-5, 2013, EPA will evaluate the ISOCS proposed for use under LANL CCP's CH waste characterization program under the inspection authority described in 40 CFR 194.8(b). The EPA evaluation includes personnel qualifications/training (by review of records and conducting interviews), operating procedures, and tests of equipment to determine regulatory compliance and assess the technical adequacy of the ISOCS.

CCP Governing Documents:

- CCP Transuranic Waste Certification Plan, CCP-PO-002, Revision 26
- CCP Transuranic Waste Characterization Quality Assurance Project Plan (QAPjP), CCP-PO-001, Revision 20

Additional Documents:

EPA requests that the documents listed below be provided prior to beginning the evaluation:

- A list of ISOCS Batch Data Reports (BDRs) that have been promoted through project level review or that have been generated to demonstrate the ISOCS NDA process
- A list of qualified personnel (operators and subject matter experts) and qualification packages for all NDA (current List of Qualified Individuals or LOQI)
- Current revision of the CCP operating procedure for the ISOCS
- A copy of the formal documents that present the technical basis and results of the ISOCS calibration, calibration confirmation, determination of the system's Total Measurement Uncertainty and Lower Limit of Detection and any other performance tests that support the ISOCS use to assay CH TRU wastes.

In addition, EPA requests to witness a demonstration of the ISOCS assaying at least one container during the on-site evaluation. If possible, EPA is interested in having the ISOCS assay a container that was previously assayed on the LANL Super High Efficiency Neutron Counter. EPA may select a small sample of each type of previously-assayed containers to be re-assayed for EPA replicate analysis and evaluation.

Inspection Logistics:

A week before the evaluation, LANL-CCP must inform EPA of the location to be used for the following meetings:

- The EPA Evaluation Team will meet with the appropriate LANL-CCP management at 8:00 am on June 4, 2013 for an opening meeting
- The EPA Evaluation Team Leader will meet with the appropriate LANL-CCP management on June 5, 2013 at 8:00 am, if deemed necessary
- A post-evaluation EPA briefing for the appropriate LANL-CCP management will be held June 5, 2013 at approximately 3:00 pm.

EPA request that CBFO or LANL-CCP facilitate unfettered access to all areas and information required to conduct this evaluation on site at LANL. EPA also requests information regarding any required personnel protective equipment for the inspection team. CBFO QA is welcome to provide observers for this EPA evaluation.