



Department of Energy
 Carlsbad Field Office
 P. O. Box 3090
 Carlsbad, New Mexico 88221



MAY 30 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: Transmittal of the Audit Plan and Notification of Assigned Auditors for Closeout Audit A-13-19, INL/CCP Analytical Solids Laboratory and Environmental Chemistry Laboratory Activities

Dear Mr. Kieling:

This letter transmits the audit plan for Carlsbad Field Office (CBFO) Closeout Audit A-13-19 of the Idaho National Laboratory Central Characterization Program (INL/CCP) Analytical Solids Laboratory and Environmental Chemistry Laboratory. The audit will be conducted as required by the Waste Isolation Pilot Plant Hazardous Waste Facility Permit Section C4-3g, and will be held at the CBFO Skeen-Whitlock Building in Carlsbad, New Mexico on July 9-11, 2013. The audit plan identifies the audit team members as required by the Permit Section C6-3.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision according to a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

If you have any questions concerning this notification, please contact Mr. Martin Navarrete, Senior Quality Assurance Specialist, at (575) 234-7483.

Sincerely,

Jose R. Franco, Manager
 Carlsbad Field Office

Enclosure

cc: w/enclosure

D. Miehl, CBFO	*ED	C. Smith, NMED	ED
M. Navarrete, CBFO	ED	P. Y. Martinez, CTAC	ED
J. R. Stroble, CBFO	ED	G. White, CTAC	ED
G. Basabilvazo, CBFO	ED	D. Harvill, CTAC	ED
N. Castaneda, CBFO	ED	WIPP Operating Record	ED
T. Kliphuis, NMED	ED	CBFO QA File	
S. Holmes, NMED	ED	CBFO M&RC	
R. Maestas, NMED	ED	*ED denotes electronic distribution	



CARLSBAD FIELD OFFICE AUDIT PLAN

Audit Number: A-13-19

Organization to be Audited: Analytical Solids and Environmental Chemistry Laboratories/
Idaho National Laboratory Central Characterization Program
(INL/CCP)

Organizations to be Notified: U.S. Department of Energy – Idaho Falls (DOE-ID)
New Mexico Environment Department (NMED)
Defense Nuclear Facilities Safety Board (DNFSB)
Nuclear Waste Partnership LLC (NWP)

Date and Location: July 9 -11, 2013
Carlsbad, New Mexico

Audit Team:

Martin Navarrete	Audit Team Management Representative, Carlsbad Field Office (CBFO)
Priscilla Y. Martinez	Audit Team Leader, CBFO Technical Assistance Contractor (CTAC)
Berry Pace	Auditor, CTAC
Paul Gomez	Technical Specialist, CTAC
Mavis Lin	Technical Specialist, CTAC

Audit Scope:

The audit will evaluate the adequacy, implementation, and effectiveness of requirements for the close-out of the INL/CCP Quality Assurance (QA) Program activities and technical activities related to headspace gas (HSG) analysis of Summary Category Group (SCG) S5000 debris waste; solids analysis of SCG S3000 homogeneous solids and S4000 soils/gravel waste; generation-level data validation and verification; and SUMMA[®] canister preparation and certification for use by other generator sites.

This closeout audit is based on the Class 2 Permit Modification Request approved by NMED on March 13, 2013, which includes the removal of chemical analytical sampling and analysis and HSG sampling and analysis from the transuranic waste characterization process. The specific items to be evaluated are listed under Activities to be Audited.

Activities to be Audited:

Quality Assurance Activities:

- Nonconformances
- Personnel Qualification and Training
- QA Records
- Sample Control

Technical Elements:

- Generation-Level Data Validation and Verification
- Headspace Gas Analysis
- Solids Analysis
- SUMMA[®] Sample Canister Preparation

The following areas from section C6-3 of the Hazardous Waste Facility Permit will be audited:

- Results of the previous audit
- Changes in programs or operations
- New programs or activities being implemented (if necessary)
- Changes in key personnel

See the attachment, Processes and Equipment to be Reviewed During Audit A-13-19 of INL-CCP Analytical Solids and Headspace Gas Laboratories.

Governing Documents/Requirements:

Adequacy of INL-CCP QA activities reviewed will be based on the current revisions of the following documents:

Waste Isolation Pilot Plant Hazardous Waste Facility Permit
NM4890139088-TSDF

DOE/CBFO-94-1012, *Quality Assurance Program Document*

DOE/WIPP-02-3122, *Transuranic Waste Acceptance Criteria for the Waste Isolation Pilot Plant*

Programmatic and technical checklists will be developed from the current revisions of the following documents:

CCP-PO-001, *CCP Transuranic Waste Characterization Quality Assurance Project Plan*

CCP-PO-002, *CCP Transuranic Waste Certification Plan*

Related QA and technical implementing procedures

Schedule of Audit Activities:

A pre-audit conference will be held Tuesday, July 9, 2013, at 8:30 a.m.

Audit team caucus meetings will be held Tuesday and Wednesday, July 9 and 10, 2013, at 3:00 p.m.

An audit team caucus meeting will be held Thursday, July 11, 2013, at 2:00 p.m.

Daily management briefings will be held Wednesday and Thursday, July 10 and 11, 2013, at 8:30 a.m. (as needed).

A post-audit conference is scheduled for Thursday, July 11, 2013, at 3:00 p.m.

All meetings will take place at a location to be determined.

Prepared by: Priscilla Y. Martinez
Priscilla Y. Martinez, CTAC
Audit Team Leader

Date: 5-29-13

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

Date: 5-30-13

**Processes and Equipment to Be Reviewed During Audit A-13-19 of the INL-CCP
Analytical Solids and Headspace Gas Laboratories**

WIPP #	Process/Equipment Description	Applicable to the Following Waste Streams/Groups of Waste Streams	Currently Approved by NMED	Currently Approved by EPA
NEW PROCESSES OR EQUIPMENT				
	NONE			
PREVIOUSLY APPROVED PROCESSES OR EQUIPMENT				
Headspace Gas				
12HE10	Environmental Chemistry Lab (ECL) – Headspace gas volatile organic compounds specified in Procedure CCP-TP-175 Equipment = GC/MS-I	DEBRIS (S5000)	Yes	N/A
12HE11	Environmental Chemistry Lab (ECL) – Headspace gas volatile organic compounds specified in Procedure CCP-TP-175 Equipment = GC/MS-J	DEBRIS (S5000)	Yes	N/A
Solids				
12HA3	Analytical Chemistry Laboratory (ACL) – Total non-halogenated volatile organic compounds specified in Procedure CCP-TP-186 Equipment = GC-1	SOILS/GRAVEL (S4000) HOMOGENEOUS SOLIDS (S3000)	Yes	N/A
12HA8	Analytical Chemistry Laboratory (ACL) – Total purgeable volatile organic compound analysis specified in Procedure CCP-TP-184 Equipment = VOA-4	SOILS/GRAVEL (S4000) HOMOGENEOUS SOLIDS (S3000)	Yes	N/A
12HA10	Analytical Chemistry Laboratory (ACL) – Total semi-volatile organic compounds specified in Procedure CCP-TP-185 Equipment = SV-6	SOILS/GRAVEL (S4000) HOMOGENEOUS SOLIDS (S3000)	Yes	N/A

**Processes and Equipment to Be Reviewed During Audit A-13-19 of the INL-CCP
Analytical Solids and Headspace Gas Laboratories**

WIPP #	Process/Equipment Description	Applicable to the Following Waste Streams/Groups of Waste Streams	Currently Approved by NMED	Currently Approved by EPA
12HA12	Analytical Chemistry Laboratory (ACL) – Total semi-volatile organic compounds specified in Procedure CCP-TP-185 Equipment = SV-8	SOILS/GRAVEL (S4000) HOMOGENEOUS SOLIDS (S3000)	Yes	N/A
12HA13	Analytical Chemistry Laboratory (ACL) – Total purgeable volatile organic compounds specified in Procedure CCP-TP-184 Equipment = VOA-5	SOILS/GRAVEL (S4000) HOMOGENEOUS SOLIDS (S3000)	Yes	N/A
12HA14	Analytical Chemistry Laboratory (ACL) – Total non-halogenated volatile organic compounds specified in Procedure CCP-TP-186 Equipment = GC-6	SOILS/GRAVEL (S4000) HOMOGENEOUS SOLIDS (S3000)	Yes	N/A
12HM8	Analytical Chemistry Laboratory (ACL) – Total metals (Hg) analysis specified in Procedure CCP-TP-181 Equipment = CVHG-2	SOILS/GRAVEL (S4000) HOMOGENEOUS SOLIDS (S3000)	Yes	N/A
12HM9	Analytical Chemistry Laboratory (ACL) – Total metals digestion specified in Procedure CCP-TP-183 Equipment = MW-3	SOILS/GRAVEL (S4000) HOMOGENEOUS SOLIDS (S3000)	Yes	N/A
12HM10	Analytical Chemistry Laboratory (ACL) – Total metals digestion specified in Procedure CCP-TP-183 Equipment = MW-4	SOILS/GRAVEL (S4000) HOMOGENEOUS SOLIDS (S3000)	Yes	N/A
12HM11	Analytical Chemistry Laboratory (ACL) – Total metals analysis specified in Procedure CCP-TP-182 Equipment = ICP-7	SOILS/GRAVEL (S4000) HOMOGENEOUS SOLIDS (S3000)	Yes	N/A

**Processes and Equipment to Be Reviewed During Audit A-13-19 of the INL-CCP
Analytical Solids and Headspace Gas Laboratories**

WIPP #	Process/Equipment Description	Applicable to the Following Waste Streams/Groups of Waste Streams	Currently Approved by NMED	Currently Approved by EPA
12HM12	Analytical Chemistry Laboratory (ACL) – Total metals (Hg) analysis specified in Procedure CCP-TP-181 Equipment = CVHG-3	SOILS/GRAVEL (S4000) HOMOGENEOUS SOLIDS (S3000)	Yes	N/A
12HM13	Analytical Chemistry Laboratory (ACL) – Total metals analysis specified in Procedure CCP-TP-182 Equipment = ICP-8	SOILS/GRAVEL (S4000) HOMOGENEOUS SOLIDS (S3000)	Yes	N/A
12HP1	Analytical Chemistry Laboratory (ACL) – Determination of Formaldehyde and Hydrazine by High-Performance Liquid Chromatography (HPLC) specified in Procedure CCP-TP-196 and CCP-TP-197 Equipment = HPLC-1	SOILS/GRAVEL (S4000) HOMOGENEOUS SOLIDS (S3000)	Yes	N/A
Processes				
N/A	Data Validation and Verification	DEBRIS (S5000) SOILS/GRAVEL (S4000) HOMOGENEOUS SOLIDS (S3000)	Yes	Yes
N/A	Sample Management as described in Procedure CCP-TP-180	SOILS/GRAVEL (S4000) HOMOGENEOUS SOLIDS (S3000)	Yes	N/A
N/A	SUMMA Canister Cleaning for generator/storage sites HSG sample collection, as described in Procedure CCP-TP-178	DEBRIS (S5000)	Yes	N/A

**Processes and Equipment to Be Reviewed During Audit A-13-19 of the INL-CCP
Analytical Solids and Headspace Gas Laboratories**

WIPP #	Process/Equipment Description	Applicable to the Following Waste Streams/Groups of Waste Streams	Currently Approved by NMED	Currently Approved by EPA
Deactivated Equipment				
12HE4	Environmental Chemistry Lab (ECL) – Headspace gas volatile organic compounds specified in Procedure CCP-TP-175 Equipment = GC/MS-H	DEBRIS (S5000)	Yes	N/A
12HE6	Environmental Chemistry Lab (ECL) – Headspace gas volatile organic compounds specified in Procedure CCP-TP-173 Equipment = GC-2	DEBRIS (S5000)	Yes	N/A