memorandum

DATE: JUL 18 2013

REPLY TO ATTN OF: CBFO:OQA:MPN:MAG:13-1484:UFC 2300.00


TO: Dale Dietzel, DOE-CH

Please be advised that an audit team from the U.S. Department of Energy, Carlsbad Field Office (CBFO) will conduct the subject audit at the Argonne National Laboratory (ANL) in Argonne, Illinois, and the Central Characterization Program (CCP) facilities at the Skeen-Whitlock Building in Carlsbad, New Mexico, on August 27-29, 2013. The audit will be conducted in accordance with the attached audit plan. Representatives from the New Mexico Environment Department (NMED) may be present to observe the audit.

Your representatives are requested to coordinate with the audit team and provide the team access to the ANL waste characterization facilities; a meeting room (with an overhead projector) to accommodate approximately 30 people for the entrance and exit meetings at both locations; working rooms for the team at both locations; cognizant personnel to support the audit; and access to the appropriate documentation and records at both locations.

If you have any questions concerning Audit A-13-24, please contact me at (575) 234-7483.

Martin P. Navarrete
Acting Director, Office of Quality Assurance

Attachment

cc: w/attachment
J. R. Stroble, CBFO
M. Pinzel, CBFO
K. Joshi, DOE-CH
F. Sharif, NWP
T. Reynolds, NWP/CCP
E. Gulbransen, NWP/CCP
V. Cannon, NWP/CCP
A. J. Fisher, NWP/CCP
I. Quintana, NWP/CCP
M. Walker, NWP/CCP
J. Carter, NWP/CCP
T. Peake, EPA
L. Bender, EPA
E. Feltcorn, EPA
R. Joglekar, EPA
S. Ghose, EPA
R. Lee, EPA
J. Kieling, NMED
T. Kliphuis, NMED
S. Holmes, NMED
R. Maestas, NMED
C. Smith, NMED
J. Harvill, CTAC
R. Allen, CBFO
G. Knox, CTAC
D. Harvill, CTAC
G. White, CTAC
WIPP Operating Record
Site Documents
CBFO QA File
CBFO M&RC

*ED denotes electronic distribution
CARLSBAD FIELD OFFICE AUDIT PLAN

Audit Number: A-13-24

Organization to be Audited: Argonne National Laboratory (ANL), Nuclear Waste Partnership, LLC (NWP) Central Characterization Program (CCP)

Organizations to be Notified: ANL NWP CCP New Mexico Environment Department Defense Nuclear Facilities Safety Board U.S. Environmental Protection Agency

Date and Location: August 27 – 29, 2013 Argonne, Illinois, and Carlsbad, New Mexico

Audit Team: Martin Navarrete Management Representative, Carlsbad Field Office (CBFO) Office of Quality Assurance
Greg Knox Audit Team Leader, CBFO Technical Assistance Contractor (CTAC)
Katie Martin* Auditor, CTAC (QA)
Tammy Bowden Auditor, CTAC (DTC)
Cindi Castillo Auditor, CTAC (AK)
Prissy Martinez Auditor, CTAC (VE)
Porf Martinez Auditor, CTAC (Trans.)
Rhett Bradford Technical Specialist, CTAC (VE)
Dick Blauvelt Technical Specialist, CTAC (AK)
Paul Gomez Technical Specialist, CTAC (V&V)
Jim Oliver Technical Specialist, CTAC (DTC)
B.J. Verret Technical Specialist, CTAC (Trans./HSG)
Joe Willis Technical Specialist, NWP (Trans.)

*To be performed in Carlsbad, NM

Audit Scope:

The audit team will evaluate the adequacy, implementation, and effectiveness of ANL/CCP technical and quality assurance activities for characterization and certification of remote-handled, Summary Category Group S5000 debris waste. The audit team will evaluate these activities for compliance to requirements in the Waste Isolation Pilot Plant Hazardous Waste Facility Permit Waste Analysis Plan (WAP), the Transuranic Waste Acceptance Criteria for the Waste Isolation Pilot Plant (WAC), the Remote-Handled TRU Waste Characterization Program Implementation Plan, and the CBFO Quality Assurance Program Document (QAPD). Elements of the WAP will be evaluated using the pertinent March 13, 2013, version of the WAP Table C6 Checklists. Due to recent changes to the Waste Isolation Pilot Plant Hazardous Waste Facility Permit, evaluation of headspace gas sampling activities will be documented on the May 8, 2012, version of the WAP Table C6 Checklists. Non-WAP-related activities will be evaluated for compliance to the requirements in the CBFO QAPD using auditor-generated checklists. See Attachment 1, Processes and Equipment to Be Reviewed During Audit A-13-24 of the ANL/CCP, for additional details.
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 Activities – Carlsbad**
- Personnel Qualification and Training
- Records
- Nonconformances

**Technical Activities – ANL and Carlsbad**
- Acceptable Knowledge (AK)
- Visual Examination (VE)
- Dose-to-Curie (DTC)
- Headspace Gas (HSG) Sampling prior to April 2013
- Project-Level Data Validation and Verification
- Dimensional Measurement
- Transportation
- Waste Certification (e.g., Waste Stream Profile Form)
- WIPP Waste Information System (WWIS)/Waste Data System (WDS)

**Governing Documents/Requirements**

Overall program adequacy and effectiveness of the ANL/CCP waste characterization processes will be based on the current revisions of the following documents:
- DOE/CBFO-94-1012, *Quality Assurance Program Document (QAPD)*
- Waste Isolation Pilot Plant Hazardous Waste Facility Permit NM4890139088-TSDF
- CCP implementing procedures

**Schedule of Audit Activities:**

All times shown are Central Daylight Time (CDT).

A pre-audit conference will be held Tuesday, August 27, 2013, at 9:00 a.m.
Management briefings will be held Wednesday, August 28, and Thursday, August 29, 2013, at 8:30 a.m.

Audit team caucus meetings will be held Tuesday, August 27, and Wednesday, August 28, 2013, at 4:00 p.m.

An audit team caucus meeting will be held Thursday, August 29, 2013, at 2:00 p.m.

A post-audit conference will be held Thursday, August 29, 2013, at 4:00 p.m.

All meetings will take place at the designated ANL/CCP and CBFO Sken-Whitlock Building locations.

Prepared by: Greg Knox, CTAC
Audit Team Leader

Date: 16 Jul 2013

Concurrence: CBFO Acting Quality Assurance Director

Date: 7-19-13
## Processes and Equipment to Be Reviewed During Audit A-13-24 of the ANL/CCP

### PREVIOUSLY APPROVED PROCESSES OR EQUIPMENT

The following will be reevaluated during CBFO Audit A-13-24.

<table>
<thead>
<tr>
<th>WIPP #</th>
<th>Process/Equipment Description</th>
<th>Applicable to the Following Summary Category Groups</th>
<th>Currently Approved by NMED</th>
<th>Currently Approved by EPA</th>
</tr>
</thead>
<tbody>
<tr>
<td>N/A</td>
<td>Headspace Gas Sampling (pre April 2013) CCP-TP-093, CCP Sampling of TRU Waste Containers</td>
<td>Debris (S5000)</td>
<td>YES</td>
<td>N/A</td>
</tr>
<tr>
<td>8RHVE1</td>
<td>Visual Examination CCP-TP-500, CCP Remote-Handled Waste Visual Examination CCP-TP-163, CCP Evaluation of Waste Packaging Records for Visual Examination of Records</td>
<td>Debris (S5000)</td>
<td>YES</td>
<td>YES (Records only)</td>
</tr>
<tr>
<td>8RHVE2</td>
<td>Visual Examination of Newly Packaged RH Waste Drums CCP-TP-500, CCP Remote-Handled Waste Visual Examination</td>
<td>Debris (S5000)</td>
<td>YES</td>
<td>YES</td>
</tr>
<tr>
<td>N/A</td>
<td>Acceptable Knowledge CCP-TP-005, CCP Acceptable Knowledge Documentation</td>
<td>Debris (S5000)</td>
<td>YES</td>
<td>YES</td>
</tr>
<tr>
<td>N/A</td>
<td>Data Verification and Validation CCP-TP-901, CCP Project Level Data Validation and Verification CCP-TP-500, CCP Remote-Handled Waste Visual Examination CCP-TP-504, CCP Dose-to-Curie Survey Procedure for Remote-Handled Transuranic Waste</td>
<td>Debris (S5000)</td>
<td>YES</td>
<td>YES</td>
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<tr>
<td>8DTC1</td>
<td>Dose-to-Curie CCP-TP-504, CCP Dose-to-Curie Survey Procedure for Remote-Handled Transuranic Waste</td>
<td>Debris (S5000)</td>
<td>N/A</td>
<td>YES</td>
</tr>
<tr>
<td>8RHGM1</td>
<td>Dimensional Measurement CCP-TP-513, CCP Procedure for Dimensional or Gravimetric Measurements for Radiological Characterization of Remote-Handled Transuranic Waste</td>
<td>Debris (S5000)</td>
<td>N/A</td>
<td>YES</td>
</tr>
<tr>
<td>N/A</td>
<td>Quality Assurance</td>
<td>N/A</td>
<td>N/A</td>
<td>YES</td>
</tr>
<tr>
<td>N/A</td>
<td>WIPP Waste Information System (WWIS) Waste Data System (WDS)</td>
<td>NA</td>
<td>YES</td>
<td>YES</td>
</tr>
</tbody>
</table>