United States Government



memorandum

Carlsbad Field Office Carlsbad, New Mexico 18823,

DATE:

JUL 18 2013

REPLY TO ATTN OF:

CBFO:OQA:MPN:MAG:13-1484:UFC 2300.00

SUBJECT:

Transmittal of Audit Plan for Recertification Audit A-13-24, ANL/CCP Transuranic Waste

Characterization Activities for Remote-Handled Waste

то: 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 *ED M. Pinzel, CBFO ED K. Joshi, DOE-CH ED F. Sharif, NWP ED ED T. Reynolds, NWP/CCP E. Gulbransen, NWP/CCP ED V. Cannon, NWP/CCP ED A. J. Fisher, NWP/CCP ED I. Quintana, NWP/CCP ED M. Walker, NWP/CCP ED J. Carter, NWP/CCP ED T. Peake, EPA ED L. Bender, EPA ED E. Feltcorn, EPA ED R. Joglekar, EPA ED S. Ghose, EPA ED

R. Lee, EPA ED J. Kieling, NMED ED T. Kliphuis, NMED ED S. Holmes, NMED ED R. Maestas, NMED ED C. Smith, NMED ED J. Harvill, CTAC ED R. Allen, CBFO ED G. Knox, CTAC ED D. Harvill, CTAC ED G. White, CTAC ED WIPP Operating Record ED Site Documents ED

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

August 27 - 29, 2013

Location: 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.)

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.

^{*}To be performed in Carlsbad, NM

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
- DOE/WIPP-02-3122, Transuranic Waste Acceptance Criteria for the Waste Isolation Pilot Plant
- Remote-Handled TRU Waste Characterization Program Implementation Plan, DOE/WIPP-02-3214
- 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 Skeen-Whitlock Building locations.

Prepared by:

FOO KNOX, CTAC

Audit Team Leader

Concurrence:

CBFO Acting Quality Assurance Director

Date: 16 JUL 2013

Processes and Equipment to Be Reviewed During Audit A-13-24 of the ANL/CCP

WIPP #	Process/Equipment Description	Applicable to the Following Summary Category Groups	Currently Approved by NMED	Currently Approved by EPA
PREVIOUSLY APPROVED PROCESSES OR EQUIPMENT				
	The following will be reeval	uated during CBFO Audit A	-13-24	
N/A	Headspace Gas Sampling (pre April 2013) CCP-TP-093, CCP Sampling of TRU Waste Containers	Debris (S5000)	YES	N/A
8RHVE1	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	Debris (S5000)	YES	YES (Records only)
8RHVE2	Visual Examination of Newly Packaged RH Waste Drums CCP-TP-500, CCP Remote-Handled Waste Visual Examination	Debris (S5000)	YES	YES
N/A	Acceptable Knowledge CCP-TP-005, CCP Acceptable Knowledge Documentation	Debris (S5000)	YES	YES
N/A	Data Verification and Validation CCP-TP-001, 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	Debris (S5000)	YES	YES
8DTC1	Dose-to-Curie CCP-TP-504, CCP Dose-to-Curie Survey Procedure for Remote-Handled Transuranic Waste	Debris (S5000)	N/A	YES
8RHGM1	Dimensional Measurement CCP-TP-513, CCP Procedure for Dimensional or Gravimetric Measurements for Radiological Characterization of Remote-Handled Transuranic Waste	Debris (S5000)	N/A	YES
N/A	Quality Assurance	N/A	N/A	YES
N/A	WIPP Waste Information System (WWIS)/Waste Data System (WDS)	NA	YES	YES