

 ENTERED



SUSANA MARTINEZ
Governor

JOHN A. SANCHEZ
Lieutenant Governor

**NEW MEXICO
ENVIRONMENT DEPARTMENT**

Hazardous Waste Bureau

2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505-6303
Phone (505) 476-6000 Fax (505) 476-6030
www.nmenv.state.nm.us



RYAN FLYNN
Cabinet Secretary Designate

BUTCH TONGATE
Deputy Secretary

TOM BLAINE, P.E.
Director

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

September 16, 2013

Jose Franco, Manager
Carlsbad Field Office
Department of Energy
P.O. Box 3090
Carlsbad, New Mexico 88221-3100

M. Farok Sharif, President
Nuclear Waste Partnership LLC
P.O. Box 2078
Carlsbad, New Mexico 88221-5608

**RE: NMED APPROVAL OF THE SAVANNAH RIVER SITE/CENTRAL CHARACTERIZATION
PROJECT FINAL AUDIT REPORT, AUDIT A-13-02
WASTE ISOLATION PILOT PLANT
EPA I.D. NUMBER NM4890139088**

Dear Messrs. Franco and Sharif:

On August 8, 2013, the New Mexico Environment Department (NMED) received the Final Audit Report of the Savannah River Site/Central Characterization Project (SRS/CCP) Audit Number A-13-02 (**Audit Report**), from the Department of Energy's Carlsbad Field Office (CBFO). CBFO and Nuclear Waste Partnership LLC (**the Permittees**) were required to submit this Audit Report under the Waste Isolation Pilot Plant (WIPP) Hazardous Waste Facility Permit as specified in Permit Section 2.3.2.3. The intended scope of this recertification audit was to ensure the adequacy, implementation, and effectiveness of the SRS/CCP waste characterization processes for retrievably stored remote handled (**RH**) Summary Category Group (SCG) S5000 debris waste, contact handled (**CH**) SCG S3000 homogeneous solids, S4000 soils/gravel, and S5000 debris waste types relative to the requirements of the WIPP Permit.



The Audit Report consisted of the following items:

- A narrative report (hardcopy and electronic)
- Copies of relevant Permit Attachment C6 checklists (hardcopy and electronic)
- Final SRS/CCP standard operating procedures for characterization of the waste categories listed above (hardcopy and electronic)
- Objective evidence examined during the audit (hardcopy and electronic):
 - General information
 - Acceptable Knowledge
 - Headspace Gas (HSG) Sampling
 - Solids and Soils/gravel Sampling
 - Real-time Radiography (RTR)
 - Visual Examination (VE)

NMED representatives observed the audit on November 6-8, 2012. NMED has examined the Audit Report for evidence of compliance with the requirements of Permit Sections 2.3.2 (Audit and Surveillance Program) and 2.3.1 (Waste Analysis Plan [WAP]).

The Audit Report indicates that the audit team identified six concerns during the audit that are discussed in the Interim Audit Report. No conditions adverse to quality regarding WAP or Permit requirements were identified.

Attached are NMED's general comments based upon review of the Audit Report. These are provided to guide future audit report preparation and to assist the Permittees in understanding NMED's concerns.

On November 28, 2012 NMED submitted an Observer Inquiry (OI) to CBFO regarding an RTR independence concern that was first discussed during the AMWTP A-13-01 audit in October 2012 and was again discussed during this SRS/CCP A-13-02 audit. NMED received a response to this OI on December 20, 2012 which included discussion on additional RTR operator training from both CCP and AMWTP.

On February 6, 2013 NMED submitted a follow-up to the OI asking for verification of training. CBFO submitted the requested verification documentation to NMED on February 8, 2013. NMED reviewed the documentation and determined that the RTR independence concern as discussed in the OI had been adequately addressed by the Permittees.

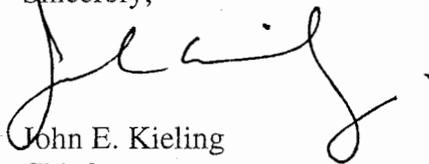
NMED will continue to observe RTR characterization activities to ensure compliance with RTR requirements of the Permit.

NMED concludes that this Audit Report demonstrates that SRS/CCP has implemented the applicable characterization requirements of the WAP. Therefore, NMED approves the Permittees' Final Audit Report for SRS/CCP Audit A-13-02 and amends the previous Audit Report approvals, A-12-02 for CH waste and A-12-04 for RH waste issued by NMED on May 23, 2012 and April 13, 2012, respectively to include only those waste forms and processes evaluated by this recertification audit.

This Audit Report approval is of the broad programmatic implementation of waste characterization requirements at SRS/CCP, and does not constitute approval of individual waste characterization procedures, nor condone inappropriate applications of those procedures. This approval does not relieve the Permittees of their obligation to comply with the requirements of the permit or other applicable laws and regulations.

If you have any questions regarding this matter, please contact Trais Kliphuis at (505) 476-6051.

Sincerely,



John E. Kieling
Chief
Hazardous Waste Bureau

JEK: tlk

cc: Tom Blane, Director, NMED EHD
Trais Kliphuis, NMED HWB
Steve Holmes, NMED HWB
Ricardo Maestas, NMED HWB
Coleman Smith, NMED HWB
Susan Lucas-Kamat, NMED DOEOB
Julia Marple, NMED DOEOB
Ted Millings, SCDHEC
Shelly Sherritt Wilson, SCDHEC
Laurie King, EPA Region 6
Tom Peake, EPA ORIA
Connie Walker, Trinity Engineering
File: Red WIPP '13

NMED COMMENTS ON THE
SAVANNAH RIVER SITE/CENTRALIZED CHARACTERIZATION PROJECT
(SRS/CCP) FINAL AUDIT REPORT A-13-02

NMED's review indicated that the body of the Audit Report and the C6 checklists generally appear to address the applicable elements. NMED provides the following comment for the Permittees consideration:

1. Responses to question 228 of the C6 Checklist were left blank.