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CERTIFIED MAIL - RETURN RECEIPT REQUESTED

September 20, 2013

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

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

**RE: NMED APPROVAL OF FINAL AUDIT REPORT, SANDIA NATIONAL
LABORATORY/CENTRAL CHARACTERIZATION PROJECT, AUDIT A-12-15
WASTE ISOLATION PILOT PLANT
EPA I.D. NUMBER NM4890139088**

Dear Messrs. Franco and Sharif:

On August 14, 2013, The New Mexico Environment Department (NMED) received the Closeout Final Audit Report of the Sandia National Laboratory/Central Characterization Project (SNL/CCP) Audit Number A-12-15 (**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 Closeout audit was to ensure the adequacy, implementation, and effectiveness of the SNL/CCP waste characterization processes for remote handled (RH) Summary Category Group (SCG) S5000 debris waste that was generated from the date of Certification Audit, June 2011, through May 2012, 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 SNL/CCP standard operating procedures for characterization of the waste category listed above (hardcopy and electronic)
- Objective evidence examined during the audit:
 - General information
 - Acceptable Knowledge (AK)
 - Headspace Gas Sampling (HSG)
 - Visual Examination (VE)

NMED observed the audit on August 14-16, 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 16 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.

NMED concludes that this Audit Report demonstrates that SNL/CCP has implemented the applicable characterization requirements of the WAP. Therefore, NMED approves the Permittee's Closeout Audit Report for SNL/CCP Audit A-12-15 and amends the previous Audit Report A-11-23 issued by NMED on November 10, 2011 to include only this waste form and processes evaluated by this audit.

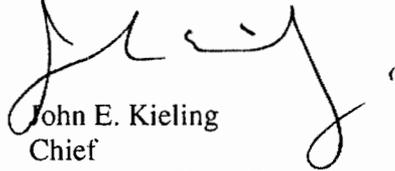
The Permittees conducted this audit as a Closeout of SNL/CCP waste characterization activities. As such, if the Permittees wish to resume shipment of waste from SNL to WIPP they must perform an on-site Initial Certification Audit before any further waste shipments from SNL to WIPP are conducted.

This Audit Report approval is of the broad programmatic implementation of waste characterization requirements at SNL/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.

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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 Blaine, Director, NMED EHD
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NMED COMMENTS ON THE
SANDIA NATIONAL LABORATORY/CENTRAL CHARACTERIZATION PROJECT
(SNL/CCP) FINAL AUDIT REPORT A-12-15

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. Questions 12, 12a, and 25 of the C6 Checklist indicate that the citations given, CCP-TP-001, Section 4.2 and CCP-TP-002, Attachments 1 and 2 answers the question. The question refers to administrative and operational procedures and the waste is RH. Although CCP-TP-500, Section 4.4 was in the Location column, Section 4.3 and Attachments 1 and 2 should also be submitted as Objective Evidence. This must be added to the list of citations in order to completely answer the question.
2. Question 22 of the C6 Checklist indicates that the citation given, CCP-TP-003, Section 4.3 answers the question. The question refers to TICs. For completeness, another citation should have been stated. The citation is CCP-TP-002, Attachments 5 and 6.
3. Questions 56 and 61 of the C6 Checklist indicate that the citation given, CCP-TP-002, Section 4.3 answers the question. For completeness, another citation should be stated. The citation is CCP-TP-002, Attachment 2 (CCP Waste Stream Profile Form).
4. Question 314 of the C6 Checklist contains four bullets; Precision, Accuracy, Completeness, Comparability. All four bullets are addressed in the Procedure column and Objective Evidence column with the exception of Accuracy. Accuracy is not addressed in the Objective Evidence column. Accuracy must be addressed or a comment must be included to explain the omission.