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

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NMED
Hazardous Waste Bureau

Mr. John E. Kieling, Chief
Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505

Subject: Transmittal of CBFO Responses to NMED Comments on Recertification Audit A-13-01 of the Advance Mixed Waste Treatment Project

Dear Mr. Kieling:

This letter transmits Carlsbad Field Office (CBFO) responses to New Mexico Environment Department (NMED) comments on Recertification Audit A-13-01 of the Advance Mixed Waste Treatment Project, as well as the revised C6-1 checklist. The C6 checklist was revised to address issues identified in a letter from the NMED dated September 10, 2013.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with 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 these responses, please contact Mr. Oba L. Vincent, Acting Director, CBFO Office of Quality Assurance, at (575) 234-7525.

Sincerely,

Jose R. Franco

Jose R. Franco, Manager
Carlsbad Field Office

Enclosures

cc: w/o enclosures

O. Vincent, CBFO	*ED
J. R. Stroble, CBFO	ED
G. Basabilvazo, CBFO	ED
M. Navarrete, CBFO	ED
D. Miehls, CBFO	ED
T. Kliphuis, NMED	ED
S. Holmes, NMED	ED
R. Maestas, NMED	ED
C. Smith, NMED	ED
J. Harvill, CTAC	ED
R. Allen, CTAC	ED
P. Martinez, CTAC	ED
G. White, CTAC	ED
D. Harvill, CTAC	ED

cc: w/enclosures

WIPP Operating Record	ED
CTAC QA File	ED
CBFO M&RC	ED

*ED denotes electronic distribution

CBFO:OQA:MPN:MAG:13-2056:UFC 2300.00

131007

RESPONSES TO NMED COMMENTS ON THE ADVANCED MIXED WASTE TREATMENT PROJECT (AMWTP) FINAL AUDIT REPORT A-13-01

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. *Question 4a of the C6 Checklist indicates that the citation given, MP-TRUW-8.13, Section 3.5 answers the question. The question pertains to an AK Sufficiency Determination. MP-TRUW - 8.13, Section 3.5 discusses the preparation of an AK Summary Report. MP-TRUW-8.13, Section 3.6 discusses the preparation of an AK Sufficiency Determination and is the correct citation to answer Question 4a.*

   Response: Revised C6-1 checklist question 4a to reference MP-TRUW-8.13, Section 3.6.

2. *Question 4c of the C6 Checklist indicates that the citation given, MP-TRUW-8.14, Section 3.1 answers the question. The question pertains to complete a Waste Stream Profile Form (WSPF) and Characterization Information Summary (CIS). The question is not answered completely. In order to complete a CIS, MP-TRUW-8.14, Section 3.2 must also be included in the answer.*

   Response: Revised C6-1 checklist question 4c and added reference MP-TRUW-8.14, Section 3.2.

3. *Questions 48 and 55 of the C6 Checklist indicate that the citation given, MP-TRUW-8.9, Section 3.2 answers the question. The question refers to data being transferred to the site project level. MP-TRUW-8.9, Section 3.2 refers to Supplemental Batches. MP-TRUW-8.9, Section 3.1 is the correct citation as it refers to Validation by the SPM, which is the site project level.*

   Response: Revised C6-1 checklist questions 48 and 55 to reference MP-TRUW-8.9, Section 3.1.

4. *Questions 296, 297, 298, 29Ba, and 300 of the C6 Checklist indicate that the citation given, QP-VE-0001, (All) answers the question. QP-VE-OOOI was not included in the Audit Report either as a hardcopy or electronically.*

   Response: QP-VE-0001 is the AMWTP Qualification Package for documenting Visual Examiner training. Objective evidence of this qualification card was submitted with the final audit report as objective evidence labeled VE-2.

Appendix A
Redlined C6 Checklists

Revised
Table C6-1 Waste Analysis Plan (WAP) Checklist
AMWTP Recertification Audit A-13-01
October 15-18, 2012

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Waste Analysis Plan (WAP) General Checklist for use at DOE's Generator/Storage Sites

	WAP Requirement[1] AMWTP Recertification Audit A-13-01 Table C6-1 Waste Analysis Plan (WAP) Checklist[1]	Procedure Documented		Example of Implementation/Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
	WASTE STREAM IDENTIFICATION					
1	Does the generator/storage site define "waste stream" as waste materials that have common physical form that contain similar hazardous constituents, and that are generated from a single process or activity? (Attachment C Section C-0a)	MP-TRUW-8.13, S. 3.3.5 (Note above)	Y	AK Summary for Supercompacted Debris Waste BN510.1, RPT-TRUW-83, Rev. 3 **(AK-1)** AK Summary for Cemented Sludge BN836, RPT-TRUW-63, Rev. 6 **(AK-2)** Waste Stream Profile Form and attachments for waste stream BN510.1 **(AK-5)** Waste Stream Profile Form and attachments for waste stream BN836 **(AK-6)**	Y	
2	Are procedures in place to ensure that the generator/storage site assigns one of the Summary Category Groups (S3000-homogeneous solids, S4000-soils/gravel, S5000-debris waste) to each waste stream? (Section C-1b)	MP-TRUW-8.13, App. B I.C.a MP-TRUW-8.14, S. 3.1	Y	AK Summary for Supercompacted Debris Waste BN510.1, RPT-TRUW-83, Rev. 3, S. 1.2.7 **(AK-1)** AK Summary for Cemented Sludge BN836, RPT-TRUW-63, Rev. 6, S. 1.2 7 **(AK-2)** Waste Stream Profile Form and attachments for waste stream BN510.1 **(AK-5)** Waste Stream Profile Form and attachments for waste stream BN836 **(AK-6)**	Y	

	WAP Requirement[1] AMWTP Recertification Audit A-13-01 Table C6-1 Waste Analysis Plan (WAP) Checklist[1]	Procedure Documented		Example of Implementation/Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
3	Are procedures in place to ensure that the generator/storage site assigns Waste Matrix Code Groups (e.g., solidified inorganics, solidified organics, salt waste, soils, combustible waste, filters, graphite, heterogeneous debris waste, inorganic nonmetal waste, lead/cadmium metal, uncategorized metal) to each waste stream? (Section C-0a)	MP-TRUW-8.13, App. B I.C.b MP-TRUW-8.14, S. 3.1	Y	AK Summary for Supercompacted Debris Waste BN510.1, RPT-TRUW-83, Rev. 3, S. 1.2.8 **(AK-1)** AK Summary for Cemented Sludge BN836, RPT-TRUW-63, Rev. 6, S. 1.2.8 **(AK-2)** Waste Stream Profile Form and attachments for waste stream BN510.1 **(AK-5)** Waste Stream Profile Form and attachments for waste stream BN836 **(AK-6)**	Y	
4	Are procedures in place to ensure that the generator/storage site assigns a Waste Stream WIPP Identifier (ID) to each waste stream? (Section C3-12b(1))	MP-TRUW-8.14, S. 3.1	Y	Waste Stream Profile Form and attachments for waste stream BN510.1 **(AK-5)** Waste Stream Profile Form and attachments for waste stream BN836 **(AK-6)**	Y	

	WAP Requirement[1] AMWTP Recertification Audit A-13-01 Table C6-1 Waste Analysis Plan (WAP) Checklist [1]	Procedure Documented		Example of Implementation/Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
4a	Are procedures in place for generator/storage sites to submit an AK Sufficiency Determination (Determination Request) to the Permittees to meet all or part of the waste characterization requirements including: • All information specified in Permit Attachment C4, Section C4-3d • Identification of relevant hazardous constituents, and correctly identifies all toxicity characteristic and listed hazardous waste numbers • All hazardous waste number assignments must be substantiated by supporting data and, if not, whether this lack of substantiation compromises the interpretation • Resolution of data discrepancies between different AK sources must be technically correct and documented • The AK Summary includes all the identification of waste material parameter weights by percentage of the material in the waste stream, and determinations are technically correct • All prohibited items specified in the TSDF-WAC should be addressed, and conclusions drawn are technically adequate and substantiated by supporting information • If the AK record includes process control information specified in Permit Attachment C4, Section C4-3b, the information should include procedures, waste manifests, or other documentation demonstrating that the controls were adequate and sufficient. • The site must provide the supporting information necessary to substantiate technical conclusions within the Determination Request, and this information must be correctly interpreted. (Section C-0b, Section C4-3d)	MP-TRUW-8.13, S. 3.~~5~~6	Y	N/A	N/A	AMWTP is not seeking an AK Sufficiency Determination for the waste streams that were audited.

	WAP Requirement[1] AMWTP Recertification Audit A-13-01 Table C6-1 Waste Analysis Plan (WAP) Checklist [1]	Procedure Documented		Example of Implementation/Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
4b	If a generator/storage site does not submit a Determination Request or if the Determination Request is not approved, are procedures in place for the generator/storage site to perform radiography or VE on 100% of the containers in a waste stream and chemical sampling and analysis on a representative sample of the waste stream using headspace gas sampling and analysis (for debris waste) or solids sampling and analysis (for homogeneous solid or soil/gravel waste) as specified in Permit Attachments C1 and C2? (Section C-0b)	MP-TRUW-8.2, S. C-0b MP-TRUW-8.9, S. 2.0 MP-TRUW-8.11 (All) MP-TRUW-8.13, S. 3.6	Y	RTR BDRs: RTR11-00393 RTR12-00019 RTR12-00070 RTR12-00101 **(GEN-1)** VE BDRs: VEB11-00929 VEB12-00555 VEB12-00711 VEB12-00747 **(GEN-2)** SS BDRs: SSC12-00001 SSG11-00008 SSG12-00001 **(GEN-3)** HSG BDRs: HS112-00002 HS112-00005 HS111-00023 **(GEN-4)**	Y	

	WAP Requirement[1] AMWTP Recertification Audit A-13-01 Table C6-1 Waste Analysis Plan (WAP) Checklist [1]	Procedure Documented		Example of Implementation/Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
4c	Are procedures in place to ensure that the generator/storage sites complete a Waste Stream Profile Form (WSPF) and Characterization Information Summary (CIS) as specified in Permit Attachment C3, Sections C3-12b(1) and C3-12b(2)? (Section C-0c)	MP-TRUW-8.14, S. 3.1 & 3.2	Y	AK Source Document Review Summary: P402A Rev. 8 with WSPF and CIS – 1st/2nd Stage Sludge AK Source Document Review Summary: P420A Rev. 7 with WSPF and CIS – Building 374 Sludge AK Source Document Review Summary: P437A Rev. 9 with WSPF and CIS – Solidified Acid and Caustic Waste AK Source Document Review Summary: P609A Rev. 7 with WSPF and CIS – Special Setups AK Source Document Review Summary: P646A Rev. 8 with WSPF and CIS – Cemented Sludge AK Source Document Review Summary: P841A Rev. 1 with WSPF and CIS – Solidified Plutonium Recovery Incinerator Waste AK Source Document Review Summary: P1358A Rev. 1 with WSPF and CIS – AMWTP WMF-676 PCB Contaminated Debris (BN600) AK Source Document Review Summary: P1030A with WSPF and CIS – Super Compacted Debris Waste **(GEN-5)**	Y	

	WAP Requirement[1] AMWTP Recertification Audit A-13-01 Table C6-1 Waste Analysis Plan (WAP) Checklist [1]	Procedure Documented		Example of Implementation/Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
5	Are procedures in place to ensure that the generator/storage site divides waste streams into waste stream lots if all of the waste within a waste stream is not accessible for sampling and analysis, as required, at one time? If so, is the division of waste streams into waste stream lots based on staging, transportation and handling issues? (Section C-1a)	MP-TRUW-8.11, S. 3.1, Form-1195 (WSPF) and Form-1598 (CIS) MP-TRUW-8.14, S. 3.1 & 4.0	Y	AK Source Document Review Summary: P402A Rev. 8 with WSPF and CIS – 1st/2nd Stage Sludge AK Source Document Review Summary: P420A Rev. 7 with WSPF and CIS – Building 374 Sludge AK Source Document Review Summary: P437A Rev. 9 with WSPF and CIS – Solidified Acid and Caustic Waste AK Source Document Review Summary: P609A Rev. 7 with WSPF and CIS – Special Setups AK Source Document Review Summary: P646A Rev. 8 with WSPF and CIS – Cemented Sludge AK Source Document Review Summary: P841A Rev. 1 with WSPF and CIS – Solidified Plutonium Recovery Incinerator Waste AK Source Document Review Summary: P1358A Rev. 1 with WSPF and CIS – AMWTP WMF-676 PCB Contaminated Debris (BN600) AK Source Document Review Summary: P1030A with WSPF and CIS – Super Compacted Debris Waste **(GEN-5)**	Y	

	WAP Requirement[1] AMWTP Recertification Audit A-13-01 Table C6-1 Waste Analysis Plan (WAP) Checklist[1]	Procedure Documented		Example of Implementation/Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
6	Are procedures in place to ensure that the generator/storage site assigns EPA hazardous waste numbers associated with the waste? If so, do these assigned EPA hazardous waste numbers correspond to the permitted EPA hazardous waste numbers in Table C-9? Are there any assigned EPA hazardous waste numbers that are not permitted EPA hazardous waste numbers on the Table C-9? If so, did the generator/storage site reject the waste for shipment to and disposal at WIPP? Did the generator assign a state hazardous waste codes or numbers? If so, is it assigned to waste that is permitted at WIPP? (Section C-1b)	MP-TRUW-8.13, S. 3.4.2	Y	AK Summary for Supercompacted Debris Waste BN510.1, RPT-TRUW-83, Rev. 3, S. 1.7 & Table 3 **(AK-1)** AK Summary for Cemented Sludge BN836, RPT-TRUW-63, Rev. 6, S. 1.6, Tables 1-1 & 1-2 **(AK-2)**	Y	
7	Are procedures in place to ensure that Summary Category Groups are defined as follows: S3000- Homogeneous solids are solid material, inorganic process residues, inorganic sludges, salt waste, and pyrochemical salt waste excluding soils, that do not meet NMED criteria for classification as debris and are at least 50 percent by volume homogeneous solids or comprise the majority of the waste stream S4000- Waste streams that are at least 50 percent by volume soil/gravel, or comprise the majority of the waste stream S5000- Waste streams that are at least 50 percent volume materials that meet the NMED criteria for debris, or comprise the majority matrix of materials. The criteria for debris are solid materials intended for disposal that exceed 2.36 inch particle size and is a manufactured object, plant or animal matter, or natural geologic material. Particles smaller than 2.36 inches in size may be considered debris if the debris is a manufactured object and if it is not a particle of S3000 or S4000 material. (Section C-0a)	MP-TRUW-8.13, S. 4.0	Y	AK Summary for Supercompacted Debris Waste BN510.1, RPT-TRUW-83, Rev. 3, S. 1.2.7 **(AK-1)** AK Summary for Cemented Sludge BN836, RPT-TRUW-63, Rev. 6, S. 1.2 7 **(AK-2)** Waste Stream Profile Form and attachments for waste stream BN510.1 **(AK-5)** Waste Stream Profile Form and attachments for waste stream BN836 **(AK-6)**	Y	

	WAP Requirement[1] AMWTP Recertification Audit A-13-01 Table C6-1 Waste Analysis Plan (WAP) Checklist [1]	Procedure Documented		Example of Implementation/Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
8	Does the generator/storage facility have procedures in place to ensure that the following waste characterization parameters will be obtained: • Determination whether TRU mixed waste streams comply with the applicable provisions of the TSDF-WAC • Determination whether TRU mixed wastes exhibit a hazardous characteristic per 20.4.1.200 NMAC (incorporating 40 CFR 261 Subpart C) • Determination whether TRU mixed wastes are listed per 20.4.1.200 NMAC (incorporating 40 CFR 261 Subpart D) • Estimation of waste material parameter weights (Section C-2)	Bullet 1: MP-TRUW-8.13, S. 3.3.7, 3.5.6 & 3.5.3 INST-FOI-17 (all) Bullets 2:&3: MP-TRUW-8.13, S. 3.5.2 Bullet 4: MP-TRUW-8.13, S. 3.5.1.6 & Appendix B, I.M MP-TRUW-8.9, S.1.0, 3.1 and 3.2 MP-TRUW-8.13, S. 3.3.3, 3.3.7, 3.5.1.6, 3.5.2, 3.5.3, & Appendix B, I.M	Bullets 1-4: Y	Bullet 1: AK Summary for Supercompacted Debris Waste BN510.1, RPT-TRUW-83, Rev. 3, S. 1.6, 1.7.2.2, 1.7.2.3, 1.7.2.4 & 1.7.2.6 **(AK-1)** AK Summary for Cemented Sludge BN836, RPT-TRUW-63, Rev. 6, S. 1.5 & 1.6.2 **(AK-2)** NCRs for prohibited items **(AK-13)** Waste Matrix Code Reference Manual, Rev. 30 **(AK-7)** VEB11-00835 **(AK-29)** VEB11-00837 **(AK-30)** VEB12-00021 **(AK-31)** VEB12-00020 **(AK-32)** VEB12-00649 **(AK-33)** VEB12-00650 **(AK-34)** VEB12-00651 **(AK-35)** Bullets 2&3: AK Summary for Supercompacted Debris Waste BN510.1, RPT-TRUW-83, Rev. 3, S. 1.7 & Table 3 **(AK-1)** AK Summary for Cemented Sludge BN836, RPT-TRUW-63, Rev. 6, S. 1.6, Tables 1-1 & 1-2 **(AK-2)** Bullet 4: AK Summary for Supercompacted Debris Waste BN510.1, RPT-TRUW-83, Rev.1, S. 1.4.5 & Table 2 **(AK-1)** AK Summary for Cemented Sludge BN836, RPT-TRUW-63, Rev. 6, S. 1.4.6 & Table 1-3 **(AK-2)**	Bullets 1-4: Y	

	WAP Requirement[1] AMWTP Recertification Audit A-13-01 Table C6-1 Waste Analysis Plan (WAP) Checklist [1]	Procedure Documented		Example of Implementation/Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
				Waste Material Parameter Weight Estimate memos for waste streams BN510.1 and BN836 **(AK-24)** <u>RTR BDRs:</u> RTR11-00393 RTR12-00019 RTR12-00070 RTR12-00101 **(GEN-1)** <u>VE BDRs:</u> VEB11-00929 VEB12-00555 VEB12-00711 VEB12-00747 **(GEN-2)** <u>SS BDRs:</u> SSC12-00001 SSG11-00008 SSG12-00001 **(GEN-3)** <u>HSG BDRs:</u> HS112-00002 HS112-00005 HS111-00023 **(GEN-4)** AK Source Document Review Summary: P402A Rev. 8 with WSPF and CIS – 1st/2nd Stage Sludge S3000 AK Source Document Review Summary: P420A Rev 7 with WSPF and CIS – Building 374 Sludge S3000 AK Source Document Review Summary: P437A Rev. 9 with WSPF and CIS – Solidified Acid and Caustic Waste S3000		

	WAP Requirement[1] AMWTP Recertification Audit A-13-01 Table C6-1 Waste Analysis Plan (WAP) Checklist [1]	Procedure Documented		Example of Implementation/Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
				AK Source Document Review Summary: P609A Rev. 7 with WSPF and CIS – Special Setups S3000 AK Source Document Review Summary: P646A Rev. 8 with WSPF and CIS – Cemented Sludge S3000 AK Source Document Review Summary: P841A Rev. 1 with WSPF and CIS – Solidified Plutonium Recovery Incinerator Waste S3000 AK Source Document Review Summary: P1358A Rev. 1 with WSPF and CIS – AMWTP WMF-676 PCB Contaminated Debris (BN600) S5000 AK Source Document Review Summary: P1030A with WSPF and CIS – Super Compacted Debris Waste S5000 **(GEN-5)**		
9	Are procedures in place to ensure that waste streams identified to contain incompatible materials or materials incompatible with waste containers cannot be shipped unless treated to remove the incompatibility? (Section C-1c)	MP-TRUW-8.13, S. 3.3.7 & 3.5.6 INST-FOI-17 (All) MP-Q&SI-5.4 (All)	Y	NCRs for prohibited items **(AK-13)** VEB11-00835 **(AK-29)** VEB11-00837 **(AK-30)** VEB12-00021 **(AK-31)** VEB12-00020 **(AK-32)** VEB12-00649 **(AK-33)** VEB12-00650 **(AK-34)** VEB12-00651 **(AK-35)** "Hold" Tag **(AK-23)** Database spreadsheet (Electronic Hold on Container) **(AK-22)**	Y	

	WAP Requirement[1] AMWTP Recertification Audit A-13-01 Table C6-1 Waste Analysis Plan (WAP) Checklist[1]	Procedure Documented		Example of Implementation/Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
10	Are procedures in place to ensure that the generator/storage site uses acceptable knowledge and, as necessary, headspace-gas sampling and analysis, radiography, (visual examination), and homogeneous waste sampling and analysis as specified in Table C-5? (Section C-3)	MP-TRUW-8.13, S. 3.5 & 3.8 (Notes 1-4) MP-TRUW-8.9, S. 3.1 and 3.2 MP-TRUW-8.14, S. 3.0	Y	AK Summary for Supercompacted Debris Waste BN510.1, RPT-TRUW-83, Rev. 3 **(AK-1)** AK Summary for Cemented Sludge BN836, RPT-TRUW-63, Rev. 6 **(AK-2)** Traceability BDRs: RTR RTR06-00548 **(AK-27)** RTR06-00062 **(AK-28)** VE VEB11-00835 **(AK-29)** VEB11-00837 **(AK-30)** VEB12-00021 **(AK-31)** VEB12-00020 **(AK-32)** VEB12-00649 **(AK-33)** VEB12-00650 **(AK-34)** VEB12-00651 **(AK-35)** HSG S&A HS111-00023 **(AK-36)** HS112-00002 **(AK-37)** Solids S&A SSC07-00101 **(AK-38)** ALD07014V **(AK-39)** ALD07011S **(AK-40)** ALD07018M **(AK-41)** ALD07007N **(AK-42)** RTR BDRs: RTR11-00393 RTR12-00019 RTR12-00070 RTR12-00101 **(GEN-1)** VE BDRs: VEB11-00929 VEB12-00555 VEB12-00711	Y	Solids Analysis was not performed for AMWTP waste streams since the last audit.

	WAP Requirement[1] AMWTP Recertification Audit A-13-01 Table C6-1 Waste Analysis Plan (WAP) Checklist[1]	Procedure Documented		Example of Implementation/Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
				VEB12-00747 **(GEN-2)** <u>SS BDRs:</u> SSC12-00001 SSG11-00008 SSG12-00001 **(GEN-3)** <u>HSG BDRs:</u> HS112-00002 HS112-00005 HS111-00023 **(GEN-4)** AK Source Document Review Summary: P402A Rev. 8 with WSPF and CIS – 1st/2nd Stage Sludge AK Source Document Review Summary: P420A Rev. 7 with WSPF and CIS – Building 374 Sludge AK Source Document Review Summary: P437A Rev. 9 with WSPF and CIS – Solidified Acid and Caustic Waste AK Source Document Review Summary: P609A Rev. 7 with WSPF and CIS – Special Setups AK Source Document Review Summary: P646A Rev. 8 with WSPF and CIS – Cemented Sludge AK Source Document Review Summary: P841A Rev. 1 with WSPF and CIS – Solidified Plutonium Recovery Incinerator Waste AK Source Document Review Summary: P1358A Rev. 1 with		

	WAP Requirement[1] AMWTP Recertification Audit A-13-01 Table C6-1 Waste Analysis Plan (WAP) Checklist [1]	Procedure Documented		Example of Implementation/Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
				WSPF and CIS – AMWTP WMF-676 PCB Contaminated Debris (BN600) AK Source Document Review Summary: P1030A with WSPF and CIS – Super Compacted Debris Waste **(GEN-5)**		
	UNACCEPTABLE WASTE					

12	Are procedures in place to ensure that the generator/storage site ensures, through administrative and operational procedures and characterization techniques, that waste containers do not include the following unacceptable waste:
	• liquid waste is not acceptable at WIPP. Liquid in the quantities delineated below is acceptable
	  • Observable liquid shall be no more than 1 percent by volume of the outermost container at the time of radiography or visual examination
	  • Internal containers with more than 60 milliliters or 3 percent by volume observable liquid, whichever is greater, are prohibited
	  • Containers with Hazardous Waste number U134 assigned shall have no observable liquid
	  • Overpacking the outermost container that was examined during radiography or visual examination or redistributing untreated liquid within the container shall not be used to meet the liquid volume limits
	• non-radionuclide pyrophoric materials
	• hazardous wastes not occurring as co-contaminants with TRU wastes (non-mixed hazardous wastes)
	• wastes incompatible with backfill, seal and panel closures materials, container and packaging materials, shipping container materials, or other wastes
	• wastes containing explosives or compressed gases (continued below)
		MP-TRUW-8.9, S. 3.1
		MP-TRUW-8.11, S. 3.2
		MP-TRUW-8.13, S. 3.3.3, 3.3.7, 3.5.1.6, 3.5.2 & 3.5.3
		INST-FOI-17, (All)
		INST-OI-12, (All)
			Y	RTR BDRs:
				RTR11-00393
				RTR12-00019
				RTR12-00070
				RTR12-00101
				(GEN-1)
				
				VE BDRs:
				VEB11-00929
				VEB12-00555
				VEB12-00711
				VEB12-00747
				(GEN-2)
				
				SS BDRs:
				SSC12-00001
				SSG11-00008
				SSG12-00001
				(GEN-3)
				
				HSG BDRs:
				HS112-00002
				HS112-00005
				HS111-00023
				(GEN-4)
				
				AK Source Document Review Summary: P402A Rev. 8 with WSPF and CIS – 1st/2nd Stage Sludge
				AK Source Document Review Summary: P420A Rev. 7 with WSPF and
					Y	Solids Analysis was not performed for AMWTP waste streams since the last audit.

	WAP Requirement[1] AMWTP Recertification Audit A-13-01 Table C6-1 Waste Analysis Plan (WAP) Checklist [1]	Procedure Documented		Example of Implementation/Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
				CIS – Building 374 Sludge AK Source Document Review Summary: P437A Rev. 9 with WSPF and CIS – Solidified Acid and Caustic Waste AK Source Document Review Summary: P609A Rev. 7 with WSPF and CIS – Special Setups AK Source Document Review Summary: P646A Rev. 8 with WSPF and CIS – Cemented Sludge AK Source Document Review Summary: P841A Rev. 1 with WSPF and CIS – Solidified Plutonium Recovery Incinerator Waste AK Source Document Review Summary: P1358A Rev. 1 with WSPF and CIS – AMWTP WMF-676 PCB Contaminated Debris (BN600) AK Source Document Review Summary: P1030A with WSPF and CIS – Super Compacted Debris Waste **(GEN-5)**		

	WAP Requirement[1] AMWTP Recertification Audit A-13-01 Table C6-1 Waste Analysis Plan (WAP) Checklist [1]	Procedure Documented		Example of Implementation/Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
12a	• wastes with polychlorinated biphenyls (PCBs) not authorized under an EPA PCB waste disposal authorization • wastes exhibiting the characteristic of ignitability, corrosivity, or reactivity (EPA Hazardous Waste Numbers of D001, D002, or D003) • waste that has ever been managed as high-level waste and waste from tanks specified in Table C-8, unless specifically approved through a Class 3 permit modification • any waste container from a waste stream (or waste stream lot) which has not undergone either radiographic or visual examination of a statistically representative subpopulation of the wastes stream in each shipment pursuant to Permit Attachment C7 • any waste container from a waste stream which has not been preceded by an appropriate, certified Waste Stream Profile Form (see Section C-1d) (Section C-1c)	MP-TRUW-8.9, S. 3.1 MP-TRUW-8.11, S. 3.2 MP-TRUW-8.13, S. 3.3.3, 3.3.7, 3.5.1.6, 3.5.2 & 3.5.3 INST-FOI-17, (All) INST-OI-12, (All)	Y	RTR BDRs: RTR11-00393 RTR12-00019 RTR12-00070 RTR12-00101 **(GEN-1)** VE BDRs: VEB11-00929 VEB12-00555 VEB12-00711 VEB12-00747 **(GEN-2)** SS BDRs: SSC12-00001 SSG11-00008 SSG12-00001 **(GEN-3)** HSG BDRs: HS112-00002 HS112-00005 HS111-00023 **(GEN-4)** AK Source Document Review Summary: P402A Rev. 8 with WSPF and CIS – 1st/2nd Stage Sludge AK Source Document Review Summary: P420A Rev. 7 with WSPF and CIS – Building 374 Sludge AK Source Document Review Summary: P437A Rev. 9 with WSPF and CIS – Solidified Acid and Caustic Waste AK Source Document Review Summary: P609A Rev. 7 with WSPF and CIS – Special Setups AK Source Document	Y	Solids Analysis was not performed for AMWTP waste streams since the last audit.

	WAP Requirement[1] AMWTP Recertification Audit A-13-01 Table C6-1 Waste Analysis Plan (WAP) Checklist [1]	Procedure Documented		Example of Implementation/Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
				Review Summary: P646A Rev. 8 with WSPF and CIS – Cemented Sludge AK Source Document Review Summary: P841A Rev. 1 with WSPF and CIS – Solidified Plutonium Recovery Incinerator Waste AK Source Document Review Summary: P1358A Rev. 1 with WSPF and CIS – AMWTP WMF-676 PCB Contaminated Debris (BN600) AK Source Document Review Summary: P1030A with WSPF and CIS – Super Compacted Debris Waste **(GEN-5)**		

	WAP Requirement[1] AMWTP Recertification Audit A-13-01 Table C6-1 Waste Analysis Plan (WAP) Checklist [1]	Procedure Documented		Example of Implementation/Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
	WASTE ACCEPTANCE CONTROL					
14	Are procedures in place to ensure that the generator/storage site uses a Waste Stream Profile Form (WSPF) which includes, at a minimum, the information indicated on the attached WSPF found in Figure C-1 and a Characterization Information Summary (CIS) prior to waste disposal at the WIPP? (Section C-1d)	MP-TRUW-8.14 (All)	Y	AK Source Document Review Summary: P402A Rev. 8 with WSPF and CIS – 1st/2nd Stage Sludge AK Source Document Review Summary: P420A Rev. 7 with WSPF and CIS – Building 374 Sludge AK Source Document Review Summary: P437A Rev. 9 with WSPF and CIS – Solidified Acid and Caustic Waste AK Source Document Review Summary: P609A Rev. 7 with WSPF and CIS – Special Setups AK Source Document Review Summary: P646A Rev. 8 with WSPF and CIS – Cemented Sludge AK Source Document Review Summary: P841A Rev. 1 with WSPF and CIS – Solidified Plutonium Recovery Incinerator Waste AK Source Document Review Summary: P1358A Rev. 1 with WSPF and CIS – AMWTP WMF-676 PCB Contaminated Debris (BN600) AK Source Document Review Summary: P1030A with WSPF and CIS – Super Compacted Debris Waste **(GEN-5)**	Y	

	WAP Requirement[1] AMWTP Recertification Audit A-13-01 Table C6-1 Waste Analysis Plan (WAP) Checklist[1]	Procedure Documented		Example of Implementation/Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
16	Are procedures in place to ensure that additional WSPFs are provided to WIPP and NMED for waste streams or portions of waste streams that are reclassified based upon waste characterization information? (Section C-1d)	MP-TRUW-8.14, S. 3.1	Y	AK Source Document Review Summary: P402A Rev. 8 with WSPF and CIS – 1st/2nd Stage Sludge AK Source Document Review Summary: P420A Rev. 7 with WSPF and CIS – Building 374 Sludge AK Source Document Review Summary: P437A Rev. 9 with WSPF and CIS – Solidified Acid and Caustic Waste AK Source Document Review Summary: P609A Rev. 7 with WSPF and CIS – Special Setups AK Source Document Review Summary: P646A Rev. 8 with WSPF and CIS – Cemented Sludge AK Source Document Review Summary: P841A Rev. 1 with WSPF and CIS – Solidified Plutonium Recovery Incinerator Waste AK Source Document Review Summary: P1358A Rev. 1 with WSPF and CIS – AMWTP WMF-676 PCB Contaminated Debris (BN600) AK Source Document Review Summary: P1030A with WSPF and CIS – Super Compacted Debris Waste **(GEN-5)**	Y	

	WAP Requirement[1] AMWTP Recertification Audit A-13-01 Table C6-1 Waste Analysis Plan (WAP) Checklist[1]	Procedure Documented		Example of Implementation/Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
16a	Are criteria in place to determine the specific circumstances under which a WSPF is revised versus when a new WSPF is required? (Section C-1d)	MP-TRUW-8.14, S. 3.3	Y	N/A	N/A	No examples of WSPF revisions for the waste streams and audit period examined.
	LABORATORY QUALIFICATION					
17	Are procedures in place to ensure that the generator/storage site conduct analyses using laboratories that are qualified through participation in the Performance Demonstration Program (PDP) for headspace gas sampling and analysis, and PDP homogeneous waste sampling and analysis? (Section C-3a(3))	INST-OI-43, S. 4.0 & Table 3 MP-TRUW-8.8, S. 3.4.8.15	Y	PDP Memo 6/4/12 **(HSG-3)**	Y	AMWTP only performs sampling for solids. Solids analysis is performed by AMWTP and PDP participation is verified under a separate audit.
18	Are procedures in place to ensure that the generator/storage sites conduct analyses using laboratories that implement the analytical methods through laboratory-documented standard operating procedures (SOPs) that ensure that analytical QAOs are met? (Section C-3a(3))	INST-OI-43, All	Y	HSG BDRs: HS111-00023 **(HSG-1)** HS112-00002 **(HSG-2)**	Y	AMWTP only performs solids sampling. Solids analysis is performed by AMWTP.
19	Are procedures in place to ensure that documented laboratory QA/QC programs include the following: • Facility organization • List of equipment/instrumentation • Operating procedures • Laboratory QA/QC procedures • Quality assurance review • Laboratory records management (Section C-4a(4))	INST-OI-43, All MP-TRUW-8.2, S. B-0 MP-TRUW-8.8, S. 3.4	Y	HSG BDRs: HS111-00023 **(HSG-1)** HS112-00002 **(HSG-2)**	Y	AMWTP only performs solids sampling. Solids analysis is performed by AMWTP

	WAP Requirement[1] AMWTP Recertification Audit A-13-01 Table C6-1 Waste Analysis Plan (WAP) Checklist [1]	Procedure Documented		Example of Implementation/Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
	GENERAL SAMPLING AND ANALYTICAL REQUIREMENTS					
20	Are procedures in place to ensure that headspace gas sampling and analysis shall be used to: • Determine the types and concentrations of VOCs in the void volume of waste containers • VOC constituents shall be compared to those assigned by Acceptable Knowledge (Section C-3a(1))	MP-TRUW-8.11, S. 3.2.8	Y	HSG BDRs: HS112-00002 HS112-00005 HS111-00023 **(GEN-4)** AK Source Document Review Summary: P402A Rev. 8 with WSPF and CIS – 1st/2nd Stage Sludge AK Source Document Review Summary: P420A Rev. 7 with WSPF and CIS – Building 374 Sludge AK Source Document Review Summary: P437A Rev. 9 with WSPF and CIS – Solidified Acid and Caustic Waste AK Source Document Review Summary: P609A Rev. 7 with WSPF and CIS – Special Setups AK Source Document Review Summary: P646A Rev. 8 with WSPF and CIS – Cemented Sludge AK Source Document Review Summary: P841A Rev. 1 with WSPF and CIS – Solidified Plutonium Recovery Incinerator Waste AK Source Document Review Summary: P1358A Rev. 1 with WSPF and CIS – AMWTP WMF-676 PCB Contaminated Debris (BN600) AK Source Document Review Summary:	Y	

	WAP Requirement[1] AMWTP Recertification Audit A-13-01 Table C6-1 Waste Analysis Plan (WAP) Checklist [1]	Procedure Documented		Example of Implementation/Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
				P1030A with WSPF and CIS – Super Compacted Debris Waste **(GEN-5)**		
22	Are procedures in place to ensure that compounds not on the list of target analytes are reported as tentatively identified compounds (TICs) and that the TIC will be added to the target analyte list if it appears in the 20.4.1.200 NMAC (incorporating 40 CFR 261) Appendix VIII list and if they are reported in 25% of the waste containers sampled from a given waste stream? (Section C-3a(1))	MP-TRUW-8.11, S. 3.2.14 MP-TRUW-8.8, S. 3.4.7.4, NOTE 4 INST-OI-43, Table 2	Y	HSG BDRs: HS111-00023 **(HSG-1)** HS112-00002 **(HSG-2)** HSG BDRs: HS112-00002 HS112-00005 HS111-00023 **(GEN-4)** AK Source Document Review Summary: P402A Rev. 8 with WSPF and CIS – 1st/2nd Stage Sludge AK Source Document Review Summary: P420A Rev. 7 with WSPF and CIS – Building 374 Sludge AK Source Document Review Summary: P437A Rev. 9 with WSPF and CIS – Solidified Acid and Caustic Waste AK Source Document Review Summary: P609A Rev. 7 with WSPF and CIS – Special Setups AK Source Document Review Summary: P646A Rev. 8 with WSPF and CIS – Cemented Sludge AK Source Document Review Summary: P841A Rev. 1 with WSPF and CIS – Solidified Plutonium Recovery Incinerator Waste AK Source Document Review Summary: P1358A Rev. 1 with	Y	

	WAP Requirement[1] AMWTP Recertification Audit A-13-01 Table C6-1 Waste Analysis Plan (WAP) Checklist [1]	Procedure Documented		Example of Implementation/Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
				WSPF and CIS – AMWTP WMF-676 PCB Contaminated Debris (BN600) AK Source Document Review Summary: P1030A with WSPF and CIS – Super Compacted Debris Waste **(GEN-5)**		
23	Are procedures in place to ensure that a randomly selected set of samples will be collected through core sampling or other EPA approved sampling from the population of waste containers for homogeneous and soil/gravel waste streams? Are procedures in place that a sufficient number of samples are collected to evaluate the toxicity characteristic of a waste stream at a 90 percent Upper Confidence limit as specified in Attachment C2? (Section C-3a(2))	MP-TRUW-8.11, S. 3.2.10 MP-TRUW-8.25, S. 3.4, 3.5 & 3.6 INST-OI-16, All INST-OI-73, All INST-OI-75, All	Y	SS BDRs: SSG12-00004 **(SOL-1)** SSC12-00004 **(SOL-2)** AK Source Document Review Summary: P402A Rev. 8 with WSPF and CIS – 1st/2nd Stage Sludge AK Source Document Review Summary: P420A Rev. 7 with WSPF and CIS – Building 374 Sludge AK Source Document Review Summary: P437A Rev. 9 with WSPF and CIS – Solidified Acid and Caustic Waste AK Source Document Review Summary: P609A Rev. 7 with WSPF and CIS – Special Setups AK Source Document Review Summary: P646A Rev. 8 with WSPF and CIS – Cemented Sludge AK Source Document Review Summary: P841A Rev. 1 with WSPF and CIS – Solidified Plutonium Recovery Incinerator Waste AK Source Document Review Summary: P1358A Rev. 1 with	Y	

	WAP Requirement[1] AMWTP Recertification Audit A-13-01 Table C6-1 Waste Analysis Plan (WAP) Checklist [1]	Procedure Documented		Example of Implementation/Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
				WSPF and CIS – AMWTP WMF-676 PCB Contaminated Debris (BN600) AK Source Document Review Summary: P1030A with WSPF and CIS – Super Compacted Debris Waste **(GEN-5)** Solids Sampling Plan for BNINW216 – Lot 21-SPC-006-11 Addendum to Solids Sampling Plan for BNINW216-Lot 21-SPC-007-11 Sampling Report for BNINW216, Lot 21 **(GEN-6)**		
24	Are procedures in place to ensure that total analyses or TCLP of VOCs, SVOCs, and RCRA-regulated metals are performed on all core samples to determine if the waste exhibits a toxicity characteristic? (Section C-3a(2))	N/A	N/A	N/A	N/A	AMWTP only performs solids sampling. Solids analysis is performed by INL/CCP.

	WAP Requirement[1] AMWTP Recertification Audit A-13-01 Table C6-1 Waste Analysis Plan (WAP) Checklist [1]	Procedure Documented		Example of Implementation/Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
25	Are procedures in place to ensure that Acceptable Knowledge is used in waste characterization activities to delineate TRU mixed waste streams, to assess whether TRU mixed wastes comply with the TSDF-WAC, to assess whether TRU mixed waste exhibits a hazardous characteristic (20.4.1.200 NMAC, incorporating 40 CFR 261 Subpart C), and to assess whether TRU wastes are listed (20.4.1.200 NMAC, incorporating 40 CFR 261 Subpart D), and to estimate waste material parameter weights? (Section C-3b)	MP-TRUW-8.13, S. 3.3.5, 3.3.7, 3.5.6 & 3.5.3 INST-FOI-17 (All) MP-TRUW-8.13, S. 3.5.2 MP-TRUW-8.13, S. 3.5.1.6 & Appendix B I.M	Y	AK Summary for Supercompacted Debris Waste BN510.1, RPT-TRUW-83, Rev. 3, S. 1.2 **(AK-1)** AK Summary for Cemented Sludge BN836, RPT-TRUW-63, Rev. 6, S. 1.2 **(AK-2)** AK Summary for Supercompacted Debris Waste BN510.1, RPT-TRUW-83, Rev. 3, S. 1.6, 1.7.2.2, 1.7.2.3, 1.7.2.4 & 1.7.2.6 **(AK-1)** AK Summary for Cemented Sludge BN836, RPT-TRUW-63, Rev. 6, S. 1.5 & 1.6.2 **(AK-2)** NCRs for prohibited items **(AK-13)** Waste Matrix Code Reference Manual **(AK-7)** VEB11-00835 **(AK-29)** VEB11-00837 **(AK-30)** VEB12-00021 **(AK-31)** VEB12-00020 **(AK-32)** VEB12-00649 **(AK-33)** VEB12-00650 **(AK-34)** VEB12-00651 **(AK-35)** AK Summary for Supercompacted Debris Waste BN510.1, RPT-TRUW-83, Rev. 3, S. 1.7 & Table 3 **(AK-1)** AK Summary for Cemented Sludge BN836, RPT-TRUW-63, Rev. 6, S. 1.6, Tables 1-1 & 1-2 **(AK-2)** AK Summary for	Y	

	WAP Requirement[1] AMWTP Recertification Audit A-13-01 Table C6-1 Waste Analysis Plan (WAP) Checklist [1]	Procedure Documented		Example of Implementation/Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
				Supercompacted Debris Waste BN510.1, RPT-TRUW-83, Rev. 1, S. 1.4.5 & Table 2 **(AK-1)** AK Summary for Cemented Sludge BN836, RPT-TRUW-63, Rev. 6, S. 1.4.6 & Table 1-3 **(AK-2)** Waste Material Parameter Weight Estimate memos for waste streams BN510.1 and BN836 **(AK-24)**		

	WAP Requirement[1] AMWTP Recertification Audit A-13-01 Table C6-1 Waste Analysis Plan (WAP) Checklist[1]	Procedure Documented		Example of Implementation/Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
26	Are procedures in place to ensure that radiography and/or visual examination are used as necessary to: • Examine a waste container to determine the physical form • Identify observable liquid in excess of TSDF-WAC limits and containerized gases • Verify the physical form matches the waste stream description (Section C-3c)	INST-OI-12, (All) INST-OI-81, (All) INST-OI-34, (All) INST-FOI-17, (All)	Y	RTR BDRs: RTR11-00378 RTR11-00387 RTR11-00401 RTR11-00414 RTR11-00426 RTR11-00442 RTR12-00015 RTR12-00029 RTR12-00054 RTR12-00081 RTR12-00096 **(RTR-1)** VE BDRs: VEB12-00044 VNC12-00156 VEB12-00200 VEB12-00540 VEB12-00725 VEB12-00764 VEB12-00766 VEB12-00941 **(VE-1)**	Y	

	WAP Requirement[1] AMWTP Recertification Audit A-13-01 Table C6-1 Waste Analysis Plan (WAP) Checklist[1]	Procedure Documented		Example of Implementation/Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
27	Are procedures in place to ensure that the following characterization activities shall occur for newly generated wastes: • Acceptable Knowledge for all wastes, with sampling and analysis as necessary to augment AK including; - Either visual examination during packaging or radiography (or VE in lieu of radiography) after packaging for all waste containers, ensuring this occurs prior to any treatment designed to supercompact waste - Headspace gas analysis for randomly selected containers, except for qualifying waste containers belonging to LANL sealed sources waste streams - Total VOC, SVOC, and Metals analyses for a selected number of homogeneous solids and soil/gravel waste containers as specified in Attachment C2 - Evaluation of any TICs found in headspace gas and totals analyses (Section C-3d(1))	MP-TRUW-8.13, S. 3.5 & 3.8 (Notes 1-4) MP-TRUW-8.11, S. 3.2 MP-TRUW-8.25, (All)	Y	AK Summary for Supercompacted Debris Waste BN510.1, RPT-TRUW-83, Rev. 3 **(AK-1)** VEB11-00835 **(AK-29)** VEB11-00837 **(AK-30)** VEB12-00021 **(AK-31)** VEB12-00020 **(AK-32)** VEB12-00649 **(AK-33)** VEB12-00650 **(AK-34)** VEB12-00651 **(AK-35)** HS111-00023 **(AK-36)** HS112-00002 **(AK-37)** HSG Random Container Selection Memos for waste stream BN510.1 **(AK-17)** HSG Sampling Report for BN510.1 **(AK-18)** Data Reconciliation reports for BN510.1 **(AK-21)** RTR BDRs: RTR11-00393 RTR12-00019 RTR12-00070 RTR12-00101 **(GEN-1)** VE BDRs: VEB11-00929 VEB12-00555 VEB12-00711 VEB12-00747 **(GEN-2)** SS BDRs: SSC12-00001 SSG11-00008 SSG12-00001 **(GEN-3)**	Y	

	WAP Requirement[1] AMWTP Recertification Audit A-13-01 Table C6-1 Waste Analysis Plan (WAP) Checklist [1]	Procedure Documented		Example of Implementation/Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
				HSG BDRs: HS112-00002 HS112-00005 HS111-00023 **(GEN-4)** AK Source Document Review Summary: P402A Rev. 8 with WSPF and CIS – 1st/2nd Stage Sludge AK Source Document Review Summary: P420A Rev. 7 with WSPF and CIS – Building 374 Sludge AK Source Document Review Summary: P437A Rev. 9 with WSPF and CIS – Solidified Acid and Caustic Waste AK Source Document Review Summary: P609A Rev. 7 with WSPF and CIS – Special Setups AK Source Document Review Summary: P646A Rev. 8 with WSPF and CIS – Cemented Sludge AK Source Document Review Summary: P841A Rev. 1 with WSPF and CIS – Solidified Plutonium Recovery Incinerator Waste AK Source Document Review Summary: P1358A Rev. 1 with WSPF and CIS – AMWTP WMF-676 PCB Contaminated Debris (BN600) AK Source Document Review Summary: P1030A with WSPF and CIS – Super Compacted		

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		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
				Debris Waste **(GEN-5)** Solids Sampling Plan for BNINW216 – Lot 21-SPC-006-11 Addendum to Solids Sampling Plan for BNINW216-Lot 21-SPC-007-11 Sampling Report for BNINW216, Lot 21 **(GEN-6)** Final Subsequent Headspace Gas Random Sample Selection Memorandum for BN510.1 Boxline Lot 2-SPC-001-12 Subsequent Headspace Gas Random Sample Selection Memorandum for BN510.1 Boxline Lot 3-SPC-002-12 Headspace Gas Sampling Report Memorandum for BN510.1 Boxline Lot 2-SPC-007-12 Preliminary Statistics of Headspace Gas Sampling for BN510.1 WS –NDK-001-12 **(GEN-7)**		
27a	Are procedures in place to ensure that the visual examination during packaging for all waste containers includes the documentation of packaging configuration, type and number of filters, and rigid liner vent hole presence and diameter necessary to determine the appropriate DAC in accordance with Permit Attachment C1, Section C1-1? (Section C-3d(1))	INST-OI-34, S. 4.2 INST-FOI-17, S. 4.2 & 4.4	Y	VE BDRs: VEB12-00044 VNC12-00156 VEB12-00200 VEB12-00540 VEB12-00725 VEB12-00764 VEB12-00766 VEB12-00941 **(VE-1)**	Y	

	WAP Requirement[1] AMWTP Recertification Audit A-13-01 Table C6-1 Waste Analysis Plan (WAP) Checklist[1]	Procedure Documented		Example of Implementation/Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
28	Are procedures in place to ensure that the following characterization activities shall occur for retrievably stored wastes: • Acceptable Knowledge for all wastes, with sampling and analysis as necessary to augment AK including; - Visual examination or radiography for all waste containers - Headspace gas analysis for randomly selected containers except for qualifying waste containers belonging to LANL sealed sources waste streams - Total VOC, SVOC, and Metals analyses for a statistically selected number of homogeneous solids and soil/gravel waste containers as specified in Attachment C2 - Evaluation of any TICs found in headspace gas and totals analyses (Section C-3d(2))	MP-TRUW-8.13, S. 3.5 & 3.8 (Notes 1-4) MP-TRUW-8.11, S. 3.2 MP-TRUW-8.25, (All)	Y	AK Summary for Cemented Sludge BN836, RPT-TRUW-63, Rev. 6 **(AK-2)** RTR06-00548 **(AK-27)** RTR06-00062 **(AK-28)** SSC07-00101 **(AK-38)** ALD07014V **(AK-39)** ALD07011S **(AK-40)** ALD07018M **(AK-41)** ALD07007N **(AK-42)** Solids Random Container Selection Memos for waste stream BN836 **(AK-19)** Solids Sampling Report for BN836 **(AK-20)** Data Reconciliation reports for BN836 **(AK-21)** RTR BDRs: RTR11-00393 RTR12-00019 RTR12-00070 RTR12-00101 **(GEN-1)** VE BDRs: VEB11-00929 VEB12-00555 VEB12-00711 VEB12-00747 **(GEN-2)** SS BDRs: SSC12-00001 SSG11-00008 SSG12-00001 **(GEN-3)** HSG BDRs: HS112-00002	Y	

	WAP Requirement[1] AMWTP Recertification Audit A-13-01 Table C6-1 Waste Analysis Plan (WAP) Checklist [1]	Procedure Documented		Example of Implementation/Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
				HS112-00005 HS111-00023 **(GEN-4)** AK Source Document Review Summary: P402A Rev. 8 with WSPF and CIS – 1st/2nd Stage Sludge AK Source Document Review Summary: P420A Rev. 7 with WSPF and CIS – Building 374 Sludge AK Source Document Review Summary: P437A Rev. 9 with WSPF and CIS – Solidified Acid and Caustic Waste AK Source Document Review Summary: P609A Rev. 7 with WSPF and CIS – Special Setups AK Source Document Review Summary: P646A Rev. 8 with WSPF and CIS – Cemented Sludge AK Source Document Review Summary: P841A Rev. 1 with WSPF and CIS – Solidified Plutonium Recovery Incinerator Waste AK Source Document Review Summary: P1358A Rev. 1 with WSPF and CIS – AMWTP WMF-676 PCB Contaminated Debris (BN600) AK Source Document Review Summary: P1030A with WSPF and CIS – Super Compacted Debris Waste **(GEN-5)**		

	WAP Requirement[1] AMWTP Recertification Audit A-13-01 Table C6-1 Waste Analysis Plan (WAP) Checklist [1]	Procedure Documented		Example of Implementation/Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
				Solids Sampling Plan for BNINW216 – Lot 21-SPC-006-11 Addendum to Solids Sampling Plan for BNINW216-Lot 21-SPC-007-11 Sampling Report for BNINW216, Lot 21 **(GEN-6)** Final Subsequent Headspace Gas Random Sample Selection Memorandum for BN510.1 Boxline Lot 2-SPC-001-12 Subsequent Headspace Gas Random Sample Selection Memorandum for BN510.1 Boxline Lot 3-SPC-002-12 Headspace Gas Sampling Report Memorandum for BN510.1 Boxline Lot 2-SPC-007-12 Preliminary Statistics of Headspace Gas Sampling for BN510.1 WS –NDK-001-12 **(GEN-7)**		

	WAP Requirement[1] AMWTP Recertification Audit A-13-01 Table C6-1 Waste Analysis Plan (WAP) Checklist [1]	Procedure Documented		Example of Implementation/Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
	DATA GENERATION, VERIFICATION, VALIDATION, DOCUMENTATION, AND QUALITY ASSURANCE					
30	Are procedures in place to ensure that the following Data Quality Objectives are met: • Use Acceptable Knowledge to delineate TRU mixed waste streams, assess whether TRU mixed wastes comply with the applicable requirements of the TSDF-WAC, assess whether TRU mixed wastes exhibit a hazardous characteristic, assess whether TRU mixed wastes are listed and to estimate waste material parameter weights • Use Headspace gas sampling and analysis, as necessary, to identify and quantify VOCs in waste containers to resolve the assignment of EPA hazardous waste numbers • Perform totals analyses of homogeneous solids and soils/gravel wastes to establish if the waste is hazardous based on the toxicity characteristics levels in 20.4.1.200 NMAC through a comparison of the upper confidence limits (UCL_{90}) of the mean concentrations to resolve the assignment of hazardous waste numbers • Use radiography or visual examination to determine physical waste form, the absence of prohibited items, and additional waste characterization techniques that may be used based on Summary Category Groups (Section C-4a(1))	MP-TRUW-8.13, S. 3.3.5, 3.3.7, 3.5.6 & 3.5.3 INST-FOI-17, (All) MP-TRUW-8.13, S. 3.5.2 MP-TRUW-8.13, S. 3.5.1.6 & Appendix B I.M MP-TRUW-8.11, S. 3.2 MP-TRUW-8.13, S. 3.3.3, 3.3.7, 3.5.1.6, 3.5.2 & 3.5.3	Y	AK Summary for Supercompacted Debris Waste BN510.1, RPT-TRUW-83, Rev. 3, S. 1.2 **(AK-1)** AK Summary for Cemented Sludge BN836, RPT-TRUW-63, Rev. 6, S. 1.2 **(AK-2)** AK Summary for Supercompacted Debris Waste BN510.1, RPT-TRUW-83, Rev. 3, S. 1.6, 1.7.2.2, 1.7.2.3, 1.7.2.4 & 1.7.2.6 **(AK-1)** AK Summary for Cemented Sludge BN836, RPT-TRUW-63, Rev. 6, S. 1.5 & 1.6.2 **(AK-2)** NCRs for prohibited items **(AK-13)** Waste Matrix Code Reference Manual **(AK-7)** VEB11-00835 **(AK-29)** VEB11-00837 **(AK-30)** VEB12-00021 **(AK-31)** VEB12-00020 **(AK-32)** VEB12-00649 **(AK-33)** VEB12-00650 **(AK-34)** VEB12-00651 **(AK-35)** AK Summary for Supercompacted Debris Waste BN510.1, RPT-TRUW-83, Rev. 3, S. 1.7 & Table 3 **(AK-1)** AK Summary for Cemented Sludge BN836, RPT-TRUW-63, Rev. 6, S. 1.6, Tables 1-1	Y	

	WAP Requirement[1] AMWTP Recertification Audit A-13-01 Table C6-1 Waste Analysis Plan (WAP) Checklist [1]	Procedure Documented		Example of Implementation/Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
				& 1-2 **(AK-2)** AK Summary for Supercompacted Debris Waste BN510.1, RPT-TRUW-83, Rev. 1, S. 1.4.5 & Table 2 **(AK-1)** AK Summary for Cemented Sludge BN836, RPT-TRUW-63, Rev. 6, S. 1.4.6 & Table 1-3 **(AK-2)** Waste Material Parameter Weight Estimate memos for waste streams BN510.1 and BN836 **(AK-24)** <u>RTR BDRs:</u> RTR11-00393 RTR12-00019 RTR12-00070 RTR12-00101 **(GEN-1)** <u>VE BDRs:</u> VEB11-00929 VEB12-00555 VEB12-00711 VEB12-00747 **(GEN-2)** <u>SS BDRs:</u> SSC12-00001 SSG11-00008 SSG12-00001 **(GEN-3)** <u>HSG BDRs:</u> HS112-00002 HS112-00005 HS111-00023 **(GEN-4)** AK Source Document Review Summary: P402A		

	WAP Requirement[1] AMWTP Recertification Audit A-13-01 Table C6-1 Waste Analysis Plan (WAP) Checklist[1]	Procedure Documented		Example of Implementation/Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
				Rev. 8 with WSPF and CIS – 1st/2nd Stage Sludge AK Source Document Review Summary: P420A Rev. 7 with WSPF and CIS – Building 374 Sludge AK Source Document Review Summary: P437A Rev. 9 with WSPF and CIS – Solidified Acid and Caustic Waste AK Source Document Review Summary: P609A Rev. 7 with WSPF and CIS – Special Setups AK Source Document Review Summary: P646A Rev. 8 with WSPF and CIS – Cemented Sludge AK Source Document Review Summary: P841A Rev. 1 with WSPF and CIS – Solidified Plutonium Recovery Incinerator Waste AK Source Document Review Summary: P1358A Rev. 1 with WSPF and CIS – AMWTP WMF-676 PCB Contaminated Debris (BN600) AK Source Document Review Summary: P1030A with WSPF and CIS – Super Compacted Debris Waste **(GEN-5)**		

	WAP Requirement[1] AMWTP Recertification Audit A-13-01 Table C6-1 Waste Analysis Plan (WAP) Checklist [1]	Procedure Documented		Example of Implementation/Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
31	Are procedures in place to ensure that the following Quality Assurance Objectives are adequately defined and assessed for each characterization method: • Precision as a measure of the mutual agreement among multiple measurements. • Accuracy as the degree of agreement between a measurement result and a true or known value. • Completeness is a measure of the amount of valid data obtained from a method compared to the total amount of data obtained that is expressed as a percentage. • Comparability is the degree to which one data set can be compared to another data set. • Representativeness as an expression of the degree to which data represent characteristics of a population. (Section C-4a(2))	MP-TRUW-8.8, S. 3.1.3.13, 3.2.4.10, 3.4.5.7, 3.4.8.13, 3.4.5.5, 3.4.8.13 & 3.5.3.14 INST-OI-43, S. 5.0 & Table 2	Y	HSG BDRs: HS111-00023 **(HSG-1)** HS112-00002 **(HSG-2)** SS BDRs: SSG12-00004 **(SOL-1)** SSC12-00004 **(SOL-2)** RTR BDRs: RTR11-00378 RTR11-00387 RTR11-00401 RTR11-00414 RTR11-00426 RTR11-00442 RTR12-00015 RTR12-00029 RTR12-00054 RTR12-00081 RTR12-00096 **(RTR-1)** VE BDRs: VEB12-00044 VNC12-00156 VEB12-00200 VEB12-00540 VEB12-00725 VEB12-00764 VEB12-00766 VEB12-00941 **(VE-1)**	Y	

	WAP Requirement[1] AMWTP Recertification Audit A-13-01 Table C6-1 Waste Analysis Plan (WAP) Checklist [1]	Procedure Documented		Example of Implementation/Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
32	With respect to data generation, are procedures in place to ensure that the generator/storage site's waste characterization program meets the following general requirements: • Analytical data packages and batch data reports must be reported accurately in a pre-approved format, must be maintained in permanent files, and must be traceable? • All data must receive a technical review by another qualified analyst? (Section C3-10a)	INST-OI-43, S. 4.0 MP-TRUW-8.8, S. 3.1, 3.2, 3.4 & 3.5 INST-OI-16, S. 4.23 INST-OI-73, S. 4.23 INST-OI-75, S. 4.15	Y	HSG BDRs: HS111-00023 **(HSG-1)** HS112-00002 **(HSG-2)** SS BDRs: SSG12-00004 **(SOL-1)** SSC12-00004 **(SOL-2)** RTR BDRs: RTR11-00378 RTR11-00387 RTR11-00401 RTR11-00414 RTR11-00426 RTR11-00442 RTR12-00015 RTR12-00029 RTR12-00054 RTR12-00081 RTR12-00096 **(RTR-1)** VE BDRs: VEB12-00044 VNC12-00156 VEB12-00200 VEB12-00540 VEB12-00725 VEB12-00764 VEB12-00766 VEB12-00941 **(VE-1)**	Y	

	WAP Requirement[1] AMWTP Recertification Audit A-13-01 Table C6-1 Waste Analysis Plan (WAP) Checklist [1]	Procedure Documented		Example of Implementation/Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
33	Are procedures in place to ensure that the generator/storage site performs validation of waste characterization data for each waste container? (Section C-4)	MP-TRUW-8.9, (All) MP-TRUW-8.8, (All)	Y	RTR BDRs: RTR11-00393 RTR12-00019 RTR12-00070 RTR12-00101 **(GEN-1)** RTR11-00378 RTR11-00387 RTR11-00401 RTR11-00414 RTR11-00426 RTR11-00442 RTR12-00015 RTR12-00029 RTR12-00054 RTR12-00081 RTR12-00096 **(RTR-1)** VE BDRs: VEB11-00929 VEB12-00555 VEB12-00711 VEB12-00747 **(GEN-2)** VEB12-00044 VNC12-00156 VEB12-00200 VEB12-00540 VEB12-00725 VEB12-00764 VEB12-00766 VEB12-00941 **(VE-1)** SS BDRs: SSC12-00001 SSG11-00008 SSG12-00001 **(GEN-3)** SSG12-00004 **(SOL-1)** SSC12-00004 **(SOL-2)** HSG BDRs: HS112-00002 HS112-00005 HS111-00023 **(GEN-4)**	Y	

	WAP Requirement[1] AMWTP Recertification Audit A-13-01 Table C6-1 Waste Analysis Plan (WAP) Checklist[1]	Procedure Documented		Example of Implementation/Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
34	Are procedures in place to ensure that the generator/storage site has a pre-approved format for reporting waste characterization data? (Section C-4a(4))	MP-TRUW-8.9, (All) MP-TRUW-8.8, (All) INST-OI-43, S. 4.8 INST-OI-16, S. 4.23 INST-OI-73, S. 4.23 INST-OI-75, S. 4.15 INST-OI-34, (All) INST-FOI-17, (All)	Y	RTR BDRs: RTR11-00393 RTR12-00019 RTR12-00070 RTR12-00101 **(GEN-1)** RTR11-00378 RTR11-00387 RTR11-00401 RTR11-00414 RTR11-00426 RTR11-00442 RTR12-00015 RTR12-00029 RTR12-00054 RTR12-00081 RTR12-00096 **(RTR-1)** VE BDRs: VEB11-00929 VEB12-00555 VEB12-00711 VEB12-00747 **(GEN-2)** VEB12-00044 VNC12-00156 VEB12-00200 VEB12-00540 VEB12-00725 VEB12-00764 VEB12-00766 VEB12-00941 **(VE-1)** SS BDRs: SSC12-00001 SSG11-00008 SSG12-00001 **(GEN-3)** SSG12-00004 **(SOL-1)** SSC12-00004 **(SOL-2)** HSG BDRs: HS112-00002 HS112-00005 HS111-00023 **(GEN-4)**	Y	

	WAP Requirement[1] AMWTP Recertification Audit A-13-01 Table C6-1 Waste Analysis Plan (WAP) Checklist [1]	Procedure Documented		Example of Implementation/Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
				AK Source Document Review Summary: P402A Rev. 8 with WSPF and CIS – 1st/2nd Stage Sludge AK Source Document Review Summary: P420A Rev. 7 with WSPF and CIS – Building 374 Sludge AK Source Document Review Summary: P437A Rev. 9 with WSPF and CIS – Solidified Acid and Caustic Waste AK Source Document Review Summary: P609A Rev. 7 with WSPF and CIS – Special Setups AK Source Document Review Summary: P646A Rev. 8 with WSPF and CIS – Cemented Sludge AK Source Document Review Summary: P841A Rev. 1 with WSPF and CIS – Solidified Plutonium Recovery Incinerator Waste AK Source Document Review Summary: P1358A Rev. 1 with WSPF and CIS – AMWTP WMF-676 PCB Contaminated Debris (BN600) AK Source Document Review Summary: P1030A with WSPF and CIS – Super Compacted Debris Waste **(GEN-5)**		

	WAP Requirement[1] AMWTP Recertification Audit A-13-01 Table C6-1 Waste Analysis Plan (WAP) Checklist [1]	Procedure Documented		Example of Implementation/Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
35	Are procedures in place to ensure that the generator/storage site prepares analytical, testing, and sampling batch data reports to meet the requirements of their own site-specific QAPjP and/or SOPs? (Section C-4a(4))	MP-TRUW-8.9, (All) MP-TRUW-8.8, (All) INST-OI-43, S. 4.8 INST-OI-16, S. 4.23 INST-OI-73, S. 4.23 INST-OI-75, S. 4.15	Y	RTR BDRs: RTR11-00393 RTR12-00019 RTR12-00070 RTR12-00101 **(GEN-1)** RTR11-00378 RTR11-00387 RTR11-00401 RTR11-00414 RTR11-00426 RTR11-00442 RTR12-00015 RTR12-00029 RTR12-00054 RTR12-00081 RTR12-00096 **(RTR-1)** VE BDRs: VEB11-00929 VEB12-00555 VEB12-00711 VEB12-00747 **(GEN-2)** VEB12-00044 VNC12-00156 VEB12-00200 VEB12-00540 VEB12-00725 VEB12-00764 VEB12-00766 VEB12-00941 **(VE-1)** SS BDRs: SSC12-00001 SSG11-00008 SSG12-00001 **(GEN-3)** SSG12-00004 **(SOL-1)** SSC12-00004 **(SOL-2)** HSG BDRs: HS112-00002 HS112-00005 HS111-00023 **(GEN-4)**	Y	

	WAP Requirement[1] AMWTP Recertification Audit A-13-01 Table C6-1 Waste Analysis Plan (WAP) Checklist [1]	Procedure Documented		Example of Implementation/Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
36	Are procedures in place to ensure that all raw data is collected and managed at the data generation level in accordance with the following criteria: • All raw data shall be signed and dated in reproducible ink by the individual collecting the data, or signed and dated using electronic signatures • All data shall be recorded clearly, legibly, and accurately in field and laboratory records and include all applicable sample identification numbers • All changes to original data shall be lined out, initialed, and dated by the individual making the change. Original data may not be obliterated or otherwise be made unreadable • All data shall be transferred and reduced from field and laboratory records completely and accurately • All field and laboratory records shall be maintained as specified in Table C-6 of Attachment C • Data shall be organized into standard reporting formats for reporting purposes. • All electronic and video data must be stored to ensure that waste container, sample and QC data are readily retrievable (Section C3-10a)	MP-TRUW- 8.1, S. G.1, G.3 & G.4 MP-TRUW-8.8, S. 3.1, 3.2, 3.4.8.17-3.4.12 & 3.5.3.20 MP-DOCS-18.2, All INST-OI-16, S. 4.11.50.7 INST-OI-73, S. 4.23 INST-OI-75, S. 4.4.10.3	Y	HSG BDRs: HS111-00023 **(HSG-1)** HS112-00002 **(HSG-2)** SS BDRs: SSG12-00004 **(SOL-1)** SSC12-00004 **(SOL-2)** RTR BDRs: RTR11-00378 RTR11-00387 RTR11-00401 RTR11-00414 RTR11-00426 RTR11-00442 RTR12-00015 RTR12-00029 RTR12-00054 RTR12-00081 RTR12-00096 **(RTR-1)** VE BDRs: VEB12-00044 VNC12-00156 VEB12-00200 VEB12-00540 VEB12-00725 VEB12-00764 VEB12-00766 VEB12-00941 **(VE-1)**	Y	AMWTP uses electronic signatures.

	WAP Requirement[1] AMWTP Recertification Audit A-13-01 Table C6-1 Waste Analysis Plan (WAP) Checklist [1]	Procedure Documented		Example of Implementation/Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
37	Are procedures in place to ensure that 100% of batch data reports are subject to independent technical review by an individual qualified to review the data who was not involved in the generation or recording of the data under review. The reviewer shall release the data through signature with an associated review checklist prior to characterization of the associated waste and shipment to the WIPP. The review shall ensure the following, as applicable: • Data generation and reduction were conducted according to the methods used and reported in the proper units and significant figures • Calculations have been verified by a valid calculation program, a spot check of verified calculation programs, and/or a 100 percent check of all hand calculations • The data have been reviewed for transcription errors • The testing, sampling, and analytical QA documentation for BDRs is complete and includes, as applicable, raw data, DAC and equilibrium calculations and times, calculation records, chain of custody forms, calibration records, QC sample results and copies or originals of gas canister sample tags. • All QC sample results are within established control limits, and if not, the data has been appropriately qualified • Reporting flags were assigned correctly • Sample holding times and preservation requirements were met, or exceptions documented • Radiography tapes are reviewed on a waste container basis at a minimum of once per testing batch or once per day of operation, whichever is less frequent. The radiography tape will be reviewed against the data on the radiography form to ensure that data are complete and correct • Field sampling records are complete • QAOs have been met (Section C3-10a(1))	MP-TRUW-8.1, S. G.3 & G.4 MP-TRUW-8.8, S. 3.1, 3.2, 3.4 & 3.5	Y	HSG BDRs: HS111-00023 **(HSG-1)** HS112-00002 **(HSG-2)** SS BDRs: SSG12-00004 **(SOL-1)** SSC12-00004 **(SOL-2)** RTR BDRs: RTR11-00378 RTR11-00387 RTR11-00401 RTR11-00414 RTR11-00426 RTR11-00442 RTR12-00015 RTR12-00029 RTR12-00054 RTR12-00081 RTR12-00096 **(RTR-1)** VE BDRs: VEB12-00044 VNC12-00156 VEB12-00200 VEB12-00540 VEB12-00725 VEB12-00764 VEB12-00766 VEB12-00941 **(VE-1)**	Y	

	WAP Requirement[1] AMWTP Recertification Audit A-13-01 Table C6-1 Waste Analysis Plan (WAP) Checklist [1]	Procedure Documented		Example of Implementation/Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
40	Are procedures in place to ensure that 100 percent of all batch data reports receive a Site Project Manager signature release with an associated review checklist prior to characterization of the associated waste and shipment to the WIPP. This release shall ensure the following: • The Site Project Manager or designee shall determine the validity of the drum age criteria (**DAC**) assignment made at the data generation level based upon an assessment of the data collection and evaluation necessary to make the assignment. • Testing batch QC checks were properly performed. Radiography data are complete and acceptable based on evidence of videotape review of one waste container per day or once per testing batch, whichever is less frequent • Sampling batch QC checks were properly performed, and meet the established QAOs and are within established data usability criteria • Analytical batch QC checks were properly performed and meet the established QAOs and are within established data usability criteria • Online batch QC checks were properly performed and meet the established QAOs and are within established data usability criteria • Proper procedures were followed to ensure representative samples of headspace gas and homogeneous solids and soil/gravel were taken • Data generation level independent technical review, validation, and verification have been performed as evidenced by the completed review checklists and appropriate signature releases. • Independent technical reviewers were not involved in the generation or recording of the data under review. • Batch Data review checklists are complete • Batch Data Reports are complete and data properly reported • Verify that data are within established data assessment criteria and meet all applicable QAOs (Section C3-10(b)(1))	MP-TRUW-8.9 (All)	Y	RTR BDRs: RTR11-00393 RTR12-00019 RTR12-00070 RTR12-00101 **(GEN-1)** VE BDRs: VEB11-00929 VEB12-00555 VEB12-00711 VEB12-00747 **(GEN-2)** SS BDRs: SSC12-00001 SSG11-00008 SSG12-00001 **(GEN-3)** HSG BDRs: HS112-00002 HS112-00005 HS111-00023 **(GEN-4)** AK Source Document Review Summary: P402A Rev. 8 with WSPF and CIS – 1st/2nd Stage Sludge AK Source Document Review Summary: P420A Rev. 7 with WSPF and CIS – Building 374 Sludge AK Source Document Review Summary: P437A Rev. 9 with WSPF and CIS – Solidified Acid and Caustic Waste AK Source Document Review Summary: P609A Rev. 7 with WSPF and CIS – Special Setups AK Source Document Review Summary: P646A	Y	

	WAP Requirement[1] AMWTP Recertification Audit A-13-01 Table C6-1 Waste Analysis Plan (WAP) Checklist [1]	Procedure Documented		Example of Implementation/Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
				Rev. 8 with WSPF and CIS – Cemented Sludge AK Source Document Review Summary: P841A Rev. 1 with WSPF and CIS – Solidified Plutonium Recovery Incinerator Waste AK Source Document Review Summary: P1358A Rev. 1 with WSPF and CIS – AMWTP WMF-676 PCB Contaminated Debris (BN600) AK Source Document Review Summary: P1030A with WSPF and CIS – Super Compacted Debris Waste **(GEN-5)** Solids Sampling Plan for BNINW216 – Lot 21-SPC-006-11 Addendum to Solids Sampling Plan for BNINW216-Lot 21-SPC-007-11 Sampling Report for BNINW216, Lot 21 **(GEN-6)** Final Subsequent Headspace Gas Random Sample Selection Memorandum for BN510.1 Boxline Lot 2-SPC-001-12 Subsequent Headspace Gas Random Sample Selection Memorandum for BN510.1 Boxline Lot 3-SPC-002-12 Headspace Gas Sampling Report		

	WAP Requirement[1] AMWTP Recertification Audit A-13-01 Table C6-1 Waste Analysis Plan (WAP) Checklist [1]	Procedure Documented		Example of Implementation/Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
				Memorandum for BN510.1 Boxline Lot 2-SPC-007-12 Preliminary Statistics of Headspace Gas Sampling for BN510.1 WS –NDK-001-12 **(GEN-7)**		
42	Are procedures in place to ensure that a repeat of the data review process at the data generation level will be performed on a minimum of one randomly chosen waste container every quarter to determine if the verification and validation is performed according to documented procedures? (Section C3-10b)	MP-TRUW-8.9, S. 3.3	Y	AMWTP Surveillance Report Surveillance 68686- Level 1 Data Generation & Validation Quarterly – Headspace Gas BDR 1Q2012 AMWTP Surveillance Report Surveillance 71536-Second Quarter Level 1 Data Generation & Validation Quarterly – RTR BDR 2Q2012 AMWTP Surveillance Report Surveillance 72733-TRU Programs 3rd Quarter Level 1 Data Generation & Validation Quarterly – VEB BDR 3Q2012 **(GEN-8)**	Y	

	WAP Requirement[1] AMWTP Recertification Audit A-13-01 Table C6-1 Waste Analysis Plan (WAP) Checklist [1]	Procedure Documented		Example of Implementation/Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
43	Are procedures in place and checklists are available to prepare a Site Project Manager (SPM) Summary and a Data Validation Summary (the summaries may be in the same document)? The SPM Summary includes a validation checklist for each batch that is of sufficient detail to document all aspects of a batch data report that could affect data quality. The Data Validation Summary must identify each Batch Data Report reviewed, describe how the validation was performed, identify all problems, and identify all acceptable and unacceptable data. Summaries must include release signatures. (Section C3-10b(2))	MP-TRUW-8.9, S. 3.0 & 3.1	Y	RTR BDRs: RTR11-00393 RTR12-00019 RTR12-00070 RTR12-00101 **(GEN-1)** VE BDRs: VEB11-00929 VEB12-00555 VEB12-00711 VEB12-00747 **(GEN-2)** SS BDRs: SSC12-00001 SSG11-00008 SSG12-00001 **(GEN-3)** HSG BDRs: HS112-00002 HS112-00005 HS111-00023 **(GEN-4)**	Y	
44	Are procedures in place to ensure that non-administrative, WAP-related nonconformances first identified at the site project manager level are reported to the Permittees within seven calendar days of identification, that nonconformance reports are prepared within 30 calendar days, and that corrective action is implemented prior to waste shipment? (Section C3-13)	MP-TRUW-8.2, S. C3-13 MP-Q&SI-5.4, S. 3.4.2	Y	NCRs: 67075, 70341, 71445 & 73050 **(GEN-9)** NCRs: 68515, 71820 & 72480 **(GEN-10)**	Y	
45	Are procedures in place to ensure that any waste container for which a nonconformance report (NCR) has been written will not be shipped to the WIPP facility unless the condition that led to the NCR for that container is appropriately identified, reconciled, corrected, and documented? Are nonconformance reports prepared for nonconformances identified? Are nonconformances identified and tracked, and does the Site Project Manager oversee the nonconformance report process? (Section C3-13)	MP-TRUW-8.2, S. C3-13 MP-Q&SI-5.4, (All)	Y	NCRs: 67075, 70341, 71445 & 73050 **(GEN-9)** NCRs: 68515, 71820 & 72480 **(GEN-10)** NCRs: 38207, 66282, 71804, 72751, 72081, 72223 & 72461 **(GEN-11)**	Y	

	WAP Requirement[1] AMWTP Recertification Audit A-13-01 Table C6-1 Waste Analysis Plan (WAP) Checklist [1]	Procedure Documented		Example of Implementation/Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
	SAMPLE CONTROL					
46	Are procedures in place to ensure that the site's sample handling and control program includes the following: • Field documentation of samples including point of origin, date of sample, container identification, sample type, analysis requested, and chain-of-custody (COC) number? • Proper labeling and/or tagging including proper sample numbering, sample identification, sample date, sampling conditions, and analysis requested? • COC record including name of sample relinquisher, sample receiver, and date and time of sample transfer? and • Proper sample handling and preservation? (Section C-4a(3))	INST-OI-16, S. 4.15 - 4.17 INST-OI-73, S. 3.1.17; 4.14 - 4.17 INST-OI-75, S. 4.6 - 4.8	Y	SS BDRs: SSG12-00004 **(SOL-1)** SSC12-00004 **(SOL-2)**	Y	AMWTP uses on-line sampling and analysis for HSG, samples are not transferred or stored.
47	Are procedures in place to ensure that the site's QAPjP or site-specific procedures includes COC forms to control the sample from the point of origin to the final analysis result reporting? (Section C-4a(3))	INST-OI-16, S. 4.15 - 4.17 INST-OI-73, S. 4.14 - 4.17 INST-OI-75, S. 4.6 - 4.8	Y	SS BDRs: SSG12-00004 **(SOL-1)** SSC12-00004 **(SOL-2)**	Y	AMWTP uses on-line sampling and analysis for HSG, samples are not transferred or stored.

	WAP Requirement[1] AMWTP Recertification Audit A-13-01 Table C6-1 Waste Analysis Plan (WAP) Checklist[1]	Procedure Documented		Example of Implementation/Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
	DATA TRANSMITTAL					
48	Are procedures in place to ensure that the generator/storage site transmits data by hard copy or electronic copy from the data generation level to the site project level? If electronic, does the generator/site have a hard copy available on demand? (Section C-4a(6))	MP-TRUW-8.9, S. 3.21	Y	RTR BDRs: RTR11-00393 RTR12-00019 RTR12-00070 RTR12-00101 **(GEN-1)** VE BDRs: VEB11-00929 VEB12-00555 VEB12-00711 VEB12-00747 **(GEN-2)** SS BDRs: SSC12-00001 SSG11-00008 SSG12-00001 **(GEN-3)** HSG BDRs: HS112-00002 HS112-00005 HS111-00023 **(GEN-4)**	Y	
50	Are procedures in place to ensure that the generator/storage site inputs the data into the WWIS manually or electronically? (Section C-4a(6))	MP-TRUW-8.5, S. 3.0	Y	Waste Certification Data Entry Form (WCDEF) and Offsite Shipping Module (OSM) for containers BN10107499 BN10376540 BN10432952 BN10463815 BN10449002 **(GEN-12)**	Y	
51	Are procedures in place to ensure that the generator/storage site enters the data into the WWIS in the exact format required by the database? (Section C-4a(6))	MP-TRUW-8.5, S. 3.0	Y	Waste Certification Data Entry Form (WCDEF) and Offsite Shipping Module (OSM) for containers BN10107499 BN10376540 BN10432952 BN10463815 BN10449002 **(GEN-12)**	Y	

	WAP Requirement[1] AMWTP Recertification Audit A-13-01 Table C6-1 Waste Analysis Plan (WAP) Checklist[1]	Procedure Documented		Example of Implementation/Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
51a	Are procedures in place to ensure that if a container was part of a composite headspace gas sample, the analytical results from the composite sample must be assigned as the container headspace gas data results, including associated TICs, for every waste container associated with the composite sample in the WWIS? (Section C3-12b(4))	MP-TRUW-8.5, S. 3.0	Y	Reconciliation with Data Quality Objectives for WSPF BNINW216.277, Rev. 1; WSPF BN510.1 (lot numbers BN510.1.0113; BN510.1.0174; BN510.1.0151)**(GEN-13)**	Y	
52	Are procedures in place to ensure all of the data presented on Table C-7 of the Permit is transmitted to the WWIS? (Table C-7)	MP-TRUW-8.5, S. 3.0	Y	Waste Certification Data Entry Form (WCDEF) and Offsite Shipping Module (OSM) for containers BN10107499 BN10376540 BN10432952 BN10463815 BN10449002 **(GEN-12)**	Y	
	RECORDS AND RECORD MANAGEMENT					
55	Are procedures in place to ensure that the generator/storage site's hard copy and/or electronic data reports follow the Permittees' format requirements? (Section C-4a(4))	MP-TRUW-8.9, S. 3.~~2~~1	Y	RTR BDRs: RTR11-00393 RTR12-00019 RTR12-00070 RTR12-00101 **(GEN-1)** VE BDRs: VEB11-00929 VEB12-00555 VEB12-00711 VEB12-00747 **(GEN-2)** SS BDRs: SSC12-00001 SSG11-00008 SSG12-00001 **(GEN-3)** HSG BDRs: HS112-00002 HS112-00005 HS111-00023 **(GEN-4)**	Y	

	WAP Requirement[1] AMWTP Recertification Audit A-13-01 Table C6-1 Waste Analysis Plan (WAP) Checklist [1]	Procedure Documented		Example of Implementation/Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
				AK Source Document Review Summary: P402A Rev. 8 with WSPF and CIS – 1st/2nd Stage Sludge AK Source Document Review Summary: P420A Rev. 7 with WSPF and CIS – Building 374 Sludge AK Source Document Review Summary: P437A Rev. 9 with WSPF and CIS – Solidified Acid and Caustic Waste AK Source Document Review Summary: P609A Rev. 7 with WSPF and CIS – Special Setups AK Source Document Review Summary: P646A Rev. 8 with WSPF and CIS – Cemented Sludge AK Source Document Review Summary: P841A Rev. 1 with WSPF and CIS – Solidified Plutonium Recovery Incinerator Waste AK Source Document Review Summary: P1358A Rev. 1 with WSPF and CIS – AMWTP WMF-676 PCB Contaminated Debris (BN600) AK Source Document Review Summary: P1030A with WSPF and CIS – Super Compacted Debris Waste **(GEN-5)**		

	WAP Requirement[1] AMWTP Recertification Audit A-13-01 Table C6-1 Waste Analysis Plan (WAP) Checklist[1]	Procedure Documented		Example of Implementation/Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
56	Are procedures in place to ensure that hard copy or electronic Waste Stream Profile Form will include the following: • Generator/storage site name • Generator/storage site EPA ID • Date of audit report approval by NMED (if obtained) • Original generator of waste stream • Whether waste is Contact-Handled or Remote-Handled • Waste Stream WIPP Identification Number • Summary Category Group • Waste Matrix Code Group • Waste Material Parameter Weight Estimates per unit of waste • Waste stream name • A description of the waste stream • Applicable EPA hazardous waste codes numbers • Applicable TRUCON codes • A listing of acceptable knowledge documentation used to identify the waste stream • The waste characterization procedures used and the reference and date of the procedure • Certification signature of Site Project Manager, name, title, and date signed (Section C3-12b(1))	MP-TRUW-8.14, S. 3.1 & 6.0	Y	AK Source Document Review Summary: P402A Rev. 8 with WSPF and CIS – 1st/2nd Stage Sludge AK Source Document Review Summary: P420A Rev. 7 with WSPF and CIS – Building 374 Sludge AK Source Document Review Summary: P437A Rev. 9 with WSPF and CIS – Solidified Acid and Caustic Waste AK Source Document Review Summary: P609A Rev. 7 with WSPF and CIS – Special Setups AK Source Document Review Summary: P646A Rev. 8 with WSPF and CIS – Cemented Sludge AK Source Document Review Summary: P841A Rev. 1 with WSPF and CIS – Solidified Plutonium Recovery Incinerator Waste AK Source Document Review Summary: P1358A Rev. 1 with WSPF and CIS – AMWTP WMF-676 PCB Contaminated Debris (BN600) AK Source Document Review Summary: P1030A with WSPF and CIS – Super Compacted Debris Waste **(GEN-5)**	Y	

	WAP Requirement[1] AMWTP Recertification Audit A-13-01 Table C6-1 Waste Analysis Plan (WAP) Checklist [1]	Procedure Documented		Example of Implementation/Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
56a	Are procedures in place to ensure that hard copy or electronic Characterization Information Summary will include the following: • Data reconciliation with DQOs • Headspace gas summary data listing the identification numbers of samples used in the statistical reduction, the maximum, mean, standard deviation, UCL_{90}, RTL, and associated EPA hazardous waste numbers that must be applied to the waste stream. • Total metal, VOC, and SVOC analytical results for homogeneous solids and soil/gravel (if applicable). • TIC listing and evaluation. • Radiography and visual examination summary to document that all prohibited items are absent in the waste (if applicable). • A complete listing of all container identification numbers used to generate the Waste Stream Profile Form, cross-referenced to each Batch Data Report. • Complete AK summary, including stream name and number, point of generation, waste stream volume (current and projected), generation dates, TRUCON codes, Summary Category Group, Waste Matrix Code(s) and Waste Matrix Code Group, other TWBIR information, waste stream description, areas of operation, generating processes, RCRA determinations, radionuclide information, all references used to generate the AK summary, and any other information required by Permit Attachment C4, Section C4-2b. • Method for determining Waste Material Parameter Weights per unit of waste. • List of any AK Sufficiency Determinations requested for the waste stream. • Certification through acceptable knowledge or testing and/or analysis that any waste assigned the hazardous waste number of U134 (hydrofluoric acid) no longer exhibits the characteristic of corrosivity. This is verified by ensuring that no liquid is present in U134 waste. • A justification for the selection of radiography and/or VE as an appropriate method of characterizing the waste. (Section C3-12b(2))	MP-TRUW-8.14, S. 3.1.3, 3.1.4, 3.1.5 & Form-1598	Y	RTR BDRs: RTR11-00393 RTR12-00019 RTR12-00070 RTR12-00101 **(GEN-1)** VE BDRs: VEB11-00929 VEB12-00555 VEB12-00711 VEB12-00747 **(GEN-2)** SS BDRs: SSC12-00001 SSG11-00008 SSG12-00001 **(GEN-3)** HSG BDRs: HS112-00002 HS112-00005 HS111-00023 **(GEN-4)** AK Source Document Review Summary: P402A Rev. 8 with WSPF and CIS – 1st/2nd Stage Sludge AK Source Document Review Summary: P420A Rev. 7 with WSPF and CIS – Building 374 Sludge AK Source Document Review Summary: P437A Rev. 9 with WSPF and CIS – Solidified Acid and Caustic Waste AK Source Document Review Summary: P609A Rev. 7 with WSPF and CIS – Special Setups AK Source Document	Y	

	WAP Requirement[1] AMWTP Recertification Audit A-13-01 Table C6-1 Waste Analysis Plan (WAP) Checklist [1]	Procedure Documented		Example of Implementation/Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
				Review Summary: P646A Rev. 8 with WSPF and CIS – Cemented Sludge AK Source Document Review Summary: P841A Rev. 1 with WSPF and CIS – Solidified Plutonium Recovery Incinerator Waste AK Source Document Review Summary: P1358A Rev. 1 with WSPF and CIS – AMWTP WMF-676 PCB Contaminated Debris (BN600) AK Source Document Review Summary: P1030A with WSPF and CIS – Super Compacted Debris Waste **(GEN-5)**		

	WAP Requirement[1] AMWTP Recertification Audit A-13-01 Table C6-1 Waste Analysis Plan (WAP) Checklist [1]	Procedure Documented		Example of Implementation/Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
56b	Are procedures in place to assure that ongoing container characterization results are cross referenced to Batch Data Reports? (Section C3-12b)	MP-TRUW-8.14, S. 3.1.3.4	Y	RTR BDRs: RTR11-00393 RTR12-00019 RTR12-00070 RTR12-00101 **(GEN-1)** VE BDRs: VEB11-00929 VEB12-00555 VEB12-00711 VEB12-00747 **(GEN-2)** SS BDRs: SSC12-00001 SSG11-00008 SSG12-00001 **(GEN-3)** HSG BDRs: HS112-00002 HS112-00005 HS111-00023 **(GEN-4)** AK Source Document Review Summary: P402A Rev. 8 with WSPF and CIS – 1st/2nd Stage Sludge AK Source Document Review Summary: P420A Rev. 7 with WSPF and CIS – Building 374 Sludge AK Source Document Review Summary: P437A Rev. 9 with WSPF and CIS – Solidified Acid and Caustic Waste AK Source Document Review Summary: P609A Rev. 7 with WSPF and CIS – Special Setups AK Source Document	Y	

	WAP Requirement[1] AMWTP Recertification Audit A-13-01 Table C6-1 Waste Analysis Plan (WAP) Checklist [1]	Procedure Documented		Example of Implementation/Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
				Review Summary: P646A Rev. 8 with WSPF and CIS – Cemented Sludge AK Source Document Review Summary: P841A Rev. 1 with WSPF and CIS – Solidified Plutonium Recovery Incinerator Waste AK Source Document Review Summary: P1358A Rev. 1 with WSPF and CIS – AMWTP WMF-676 PCB Contaminated Debris (BN600) AK Source Document Review Summary: P1030A with WSPF and CIS – Super Compacted Debris Waste **(GEN-5)**		

	WAP Requirement[1] AMWTP Recertification Audit A-13-01 Table C6-1 Waste Analysis Plan (WAP) Checklist [1]	Procedure Documented		Example of Implementation/Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
58	Are procedures in place to ensure that project level reports are compiled into Characterization Information Summaries? (Section C3-12b)	MP-TRUW-8.14, S. 3.1.3 & Form-1598	Y	RTR BDRs: RTR11-00393 RTR12-00019 RTR12-00070 RTR12-00101 **(GEN-1)** VE BDRs: VEB11-00929 VEB12-00555 VEB12-00711 VEB12-00747 **(GEN-2)** SS BDRs: SSC12-00001 SSG11-00008 SSG12-00001 **(GEN-3)** HSG BDRs: HS112-00002 HS112-00005 HS111-00023 **(GEN-4)** AK Source Document Review Summary: P402A Rev. 8 with WSPF and CIS – 1st/2nd Stage Sludge AK Source Document Review Summary: P420A Rev. 7 with WSPF and CIS – Building 374 Sludge AK Source Document Review Summary: P437A Rev. 9 with WSPF and CIS – Solidified Acid and Caustic Waste AK Source Document Review Summary: P609A Rev. 7 with WSPF and CIS – Special Setups AK Source Document	Y	

	WAP Requirement[1] AMWTP Recertification Audit A-13-01 Table C6-1 Waste Analysis Plan (WAP) Checklist [1]	Procedure Documented		Example of Implementation/Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
				Review Summary: P646A Rev. 8 with WSPF and CIS – Cemented Sludge AK Source Document Review Summary: P841A Rev. 1 with WSPF and CIS – Solidified Plutonium Recovery Incinerator Waste AK Source Document Review Summary: P1358A Rev. 1 with WSPF and CIS – AMWTP WMF-676 PCB Contaminated Debris (BN600) AK Source Document Review Summary: P1030A with WSPF and CIS – Super Compacted Debris Waste **(GEN-5)**		

	WAP Requirement[1] AMWTP Recertification Audit A-13-01 Table C6-1 Waste Analysis Plan (WAP) Checklist[1]	Procedure Documented		Example of Implementation/Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
59	Are procedures in place to ensure that the generator/storage site uses forms for data reporting that are pre-approved forms in site-specific documentation? (Section C3-12)	MP-TRUW-8.8, S. 3.1, 3.2, 3.4 & 3.5 INST-OI-43, S. 4.8 INST-OI-16, S. 4.23 INST-OI-73, S. 4.23 INST-OI-75, S. 4.15	Y	HSG BDRs: HS111-00023 **(HSG-1)** HS112-00002 **(HSG-2)** SS BDRs: SSG12-00004 **(SOL-1)** SSC12-00004 **(SOL-2)** RTR BDRs: RTR11-00378 RTR11-00387 RTR11-00401 RTR11-00414 RTR11-00426 RTR11-00442 RTR12-00015 RTR12-00029 RTR12-00054 RTR12-00081 RTR12-00096 **(RTR-1)** VE BDRs: VEB12-00044 VNC12-00156 VEB12-00200 VEB12-00540 VEB12-00725 VEB12-00764 VEB12-00766 VEB12-00941 **(VE-1)**	Y	

	WAP Requirement[1] AMWTP Recertification Audit A-13-01 Table C6-1 Waste Analysis Plan (WAP) Checklist [1]	Procedure Documented		Example of Implementation/Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
60	Are procedures in place to ensure that the generator/storage site's site project manager submits to the WIPP facility a summary of the waste stream information and reconciliation with data quality objectives (DQOs) once a waste stream is characterized? (Section C-4a(6))	MP-TRUW-8.14, S. 3.1.10	Y	AK Source Document Review Summary: P402A Rev. 8 with WSPF and CIS – 1st/2nd Stage Sludge AK Source Document Review Summary: P420A Rev. 7 with WSPF and CIS – Building 374 Sludge AK Source Document Review Summary: P437A Rev. 9 with WSPF and CIS – Solidified Acid and Caustic Waste AK Source Document Review Summary: P609A Rev. 7 with WSPF and CIS – Special Setups AK Source Document Review Summary: P646A Rev. 8 with WSPF and CIS – Cemented Sludge AK Source Document Review Summary: P841A Rev. 1 with WSPF and CIS – Solidified Plutonium Recovery Incinerator Waste AK Source Document Review Summary: P1358A Rev. 1 with WSPF and CIS – AMWTP WMF-676 PCB Contaminated Debris (BN600) AK Source Document Review Summary: P1030A with WSPF and CIS – Super Compacted Debris Waste **(GEN-5)**	Y	

	WAP Requirement[1] AMWTP Recertification Audit A-13-01 Table C6-1 Waste Analysis Plan (WAP) Checklist [1]	Procedure Documented		Example of Implementation/Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
61	Are procedures in place to ensure that the generator/storage site project office completes a WSPF based on the Batch Data Reports? (C3-12b)	MP-TRUW-8.14, S. 3.1	Y	RTR BDRs: RTR11-00393 RTR12-00019 RTR12-00070 RTR12-00101 **(GEN-1)** VE BDRs: VEB11-00929 VEB12-00555 VEB12-00711 VEB12-00747 **(GEN-2)** SS BDRs: SSC12-00001 SSG11-00008 SSG12-00001 **(GEN-3)** HSG BDRs: HS112-00002 HS112-00005 HS111-00023 **(GEN-4)** AK Source Document Review Summary: P402A Rev. 8 with WSPF and CIS – 1st/2nd Stage Sludge AK Source Document Review Summary: P420A Rev. 7 with WSPF and CIS – Building 374 Sludge AK Source Document Review Summary: P437A Rev. 9 with WSPF and CIS – Solidified Acid and Caustic Waste AK Source Document Review Summary: P609A Rev. 7 with WSPF and CIS – Special Setups AK Source Document	Y	

	WAP Requirement[1] AMWTP Recertification Audit A-13-01 Table C6-1 Waste Analysis Plan (WAP) Checklist [1]	Procedure Documented		Example of Implementation/Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
				Review Summary: P646A Rev. 8 with WSPF and CIS – Cemented Sludge AK Source Document Review Summary: P841A Rev. 1 with WSPF and CIS – Solidified Plutonium Recovery Incinerator Waste AK Source Document Review Summary: P1358A Rev. 1 with WSPF and CIS – AMWTP WMF-676 PCB Contaminated Debris (BN600) AK Source Document Review Summary: P1030A with WSPF and CIS – Super Compacted Debris Waste **(GEN-5)**		

	WAP Requirement[1] AMWTP Recertification Audit A-13-01 Table C6-1 Waste Analysis Plan (WAP) Checklist[1]	Procedure Documented		Example of Implementation/Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
62	Are procedures in place to ensure that the generator/storage Site Project Manager submits the WSPF to the Permittees for DOE's approval along with the accompanying Characterization Information Summary for that waste stream? (Section C-4a(6))	MP-TRUW-8.14, S. 3.1.10	Y	AK Source Document Review Summary: P402A Rev. 8 with WSPF and CIS – 1st/2nd Stage Sludge AK Source Document Review Summary: P420A Rev. 7 with WSPF and CIS – Building 374 Sludge AK Source Document Review Summary: P437A Rev. 9 with WSPF and CIS – Solidified Acid and Caustic Waste AK Source Document Review Summary: P609A Rev. 7 with WSPF and CIS – Special Setups AK Source Document Review Summary: P646A Rev. 8 with WSPF and CIS – Cemented Sludge AK Source Document Review Summary: P841A Rev. 1 with WSPF and CIS – Solidified Plutonium Recovery Incinerator Waste AK Source Document Review Summary: P1358A Rev. 1 with WSPF and CIS – AMWTP WMF-676 PCB Contaminated Debris (BN600) AK Source Document Review Summary: P1030A with WSPF and CIS – Super Compacted Debris Waste **(GEN-5)**	Y	

	WAP Requirement[1] AMWTP Recertification Audit A-13-01 Table C6-1 Waste Analysis Plan (WAP) Checklist[1]	Procedure Documented		Example of Implementation/Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
63	Are procedures in place to ensure that the generator/storage site maintains records related to waste characterization sampling and analysis activities in the testing, sampling or analytical facilities files, or site project files for those facilities located on-site? (Section C-4a(7))	MP-TRUW-8.2, S. C-4a(7) MP-DOCS-18.2 S. 3.5 and Appendix B	Y	Project Record Categories, Classification, Disposition, and Retention Matrix (Appendix B of MP-DOCS-18.2.) **(GEN-14)**	Y	
64	Are procedures in place to ensure that the appropriate documented training and indoctrination is performed for all individuals and that procedures are documented in site specific QAPjPs and procedures? (Section C3-14)	MP-RTQP-14.4, (All) MP-TRUW-8.2, S. C3-14 LST-RTQP-03-IM, S. 2.0	Y	Qualification records for selected CCP personnel. **(GEN-15)** RTR Operator Training Records **(RTR-2)**	Y	
65	Are procedures in place to ensure that the generator/storage site requires contract waste analytical facilities to forward testing, sampling and analytical records along with testing, sampling and analytical batch data reports to the site project office for inclusion in the sites project files? (Section C-4a(7))	N/A	N/A	N/A	N/A	Solids analysis is performed by the INL Analytical Laboratory, which CBFO has previously certified. The analytical laboratory was not in the scope of this audit.
66	Are procedures in place to ensure that the generator/storage site has an appropriate records inventory and disposition schedule (RIDS) or equivalent that was prepared and approved by appropriate site personnel? (Section C-4a(7))	MP-TRUW-8.2, S. C-4a(7) MP-DOCS-18.2 (All)	Y	Project Record Categories, Classification, Disposition, and Retention Matrix (Appendix B of MP-DOCS-18.2.) **(GEN-14)**	Y	
67	Are procedures in place to ensure that the generator/storage site maintains all records relevant to an enforcement action, regardless of disposition, until they are no longer needed for enforcement action, and then dispositioned per the approved RIDS? (Section C-4a(7))	MP-DOCS-18.2, (All)	Y	Project Record Categories, Classification, Disposition, and Retention Matrix (Appendix B of MP-DOCS-18.2.) **(GEN-14)**	Y	

	WAP Requirement[1] AMWTP Recertification Audit A-13-01 Table C6-1 Waste Analysis Plan (WAP) Checklist[1]	Procedure Documented		Example of Implementation/Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
68	Are procedures in place to ensure that the generator/storage site maintains records that are designated as Lifetime Records for the life of the waste characterization program plus six years or that the records have been transferred to the WIPP Records Archive facility? Lifetime Records include: • Field sampling data forms, • Field and laboratory COC forms, • Test facility and laboratory Batch Data Reports, • Waste Stream Characterization Package, • Sampling plans, • Data reduction, validation, and reporting documentation, • Acceptable knowledge documentation, • WSPF and Characterization Information Summary (Section C-4a(7), Table C-6)	MP-TRUW-8.2, S. C-4a(7) MP-DOCS-18.2, S. 3.6.4.1, 4.0, & App. B	Y	Project Record Categories, Classification, Disposition, and Retention Matrix (Appendix B of MP-DOCS-18.2.) **(GEN-14)**	Y	

	WAP Requirement[1] AMWTP Recertification Audit A-13-01 Table C6-1 Waste Analysis Plan (WAP) Checklist[1]	Procedure Documented		Example of Implementation/Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
	is identifiable and legible, and provides documentary evidence of quality? (Section C-4a(7))	S. 3.1, 3.2, 3.4 & 3.5 INST-OI-43, S. 4.8 INST-OI-16, S. 4.23 INST-OI-73, S. 4.23 INST-OI-75, S. 4.15		HS111-00023 **(HSG-1)** HS112-00002 **(HSG-2)** SS BDRs: SSG12-00004 **(SOL-1)** SSC12-00004 **(SOL-2)** RTR BDRs: RTR11-00378 RTR11-00387 RTR11-00401 RTR11-00414 RTR11-00426 RTR11-00442 RTR12-00015 RTR12-00029 RTR12-00054 RTR12-00081 RTR12-00096 **(RTR-1)** VE BDRs: VEB12-00044 VNC12-00156 VEB12-00200 VEB12-00540 VEB12-00725 VEB12-00764 VEB12-00766 VEB12-00941 **(VE-1)**		
71	Are procedures in place to ensure that if the generator/storage site ceases to operate, that all records be transferred before closeout? (Section C-4a(7))	MP-TRUW-8.2, S. C-4a(7) MP-DOCS-18.2, App. B	Y	Project Record Categories, Classification, Disposition, and Retention Matrix (Appendix B of MP-DOCS-18.2.) **(GEN-14)**	Y	The AMWTP is still in operations, however, should work cease, records will be transmitted to the WIPP in accordance with MP-DOCS-18.2.

	WAP Requirement[1] AMWTP Recertification Audit A-13-01 Table C6-1 Waste Analysis Plan (WAP) Checklist[1]	Procedure Documented		Example of Implementation/Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
	SHIPMENT					
72	Are procedures in place to ensure that the generator/storage site accurately completes an EPA Hazardous Waste Manifest prior to shipping the waste to WIPP that contains the following information: • Generator/storage site name and EPA ID • Generator/storage site contact name and phone number • Quantity of waste • List of up to six state and/or federal hazardous waste numbers in each line item • Listing of all container IDS • Signature of authorized generator representative (Section C-5b)	MP-TRUW-8.12, S. 3.3.6-3.3.21	Y	Hazardous Waste Mamifest: 001600433GBF**(GEN-16)** 001600458GBF**(GEN-17)**	Y	
73	Are procedures in place to ensure that the generator/storage site accurately completes the following container specific information: • Waste stream identification number • List of hazardous waste numbers per container • Certification data • Shipping data (Section C-5b)	MP-TRUW-8.12, S. 3.3.6-3.3.21	Y	Hazardous Waste Mamifest: 001600433GBF**(GEN-16)** 001600458GBF**(GEN-17)**	Y	

1. The WAP requirements should be presented in documents, such as procedures. Each of the questions posed under WAP requirements is meant to ask whether procedures are in place or whether documents are evident which demonstrate that the specific WAP requirement is or can be met.