Department of Energy
Carlsbad Field Office
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NMED
Hazardous Waste Bureau

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Mr. John E. Kieling, Chief
Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505-6303

Subject: Revised Documents and CBFO Responses to NMED Comments on Final Audit Report A-12-15 of the SNL/CCP

Dear Mr. Kieling:

This letter transmits the Carlsbad Field Office (CBFO) responses to the New Mexico Environment Department (NMED) comments received by letter dated September 20, 2013, and the revised C6-1 and C6-6 Checklists for Audit A-12-15 of the Sandia National Laboratories Central Characterization Project.

Please contact Acting Quality Assurance Director, Oba Vincent, at (575) 234-7525, should you have any questions concerning these documents.

Sincerely,

Jose R. Franco, Manager
Carlsbad Field Office

Enclosures

cc: w/ enclosures

O. Vincent, CBFO	*ED	J. Harvill, CTAC	ED
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T. Kliphuis, NMED	ED	WIPP Operating Record	
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NMED COMMENTS ON THE SANDIA NATIONAL LABORATORIES CENTRAL CHARACTERIZATION PROJECT (SNL/CCP) FINAL AUDIT REPORT A-12-15

NMED's review indicated that the body of the audit report and the C6 checklists generally appear to address the applicable elements. NMED provided the following comments for the Permittees' consideration.

1. Questions 12, 12a, and 25 of the C6 Checklist indicate that the citations given, CCP-TP-001, Section 4.2 and CCP-TP-002, Attachments 1 and 2 answers the question. The question refers to administrative and operational procedures and the waste is RH. Although CCP-TP-500, Section 4.4 was in the Location column, section 4.3 and Attachments 1 and 2 should also be submitted as Objective Evidence. This must be added to the list of citations in order to completely answer the question.

   Response: The Objective Evidence is correct for the questions. The Location information as stated in the comment (Section 4.3 and Attachments 1 and 2) was added to the Location to completely answer the questions.

2. Question 22 of the C6 Checklist indicates that the citation given, CCP-TP-003, Section 4.3 answers the question. The question refers to TICs. For completeness, another citation should have been stated. The citation is CCP-TP-002, Attachments 5 and 6.

   Response: The C6 question citation was corrected to add the citation as recommended in the comment.

3. Questions 56 and 61 of the C6 Checklist indicate that the citation given, CCP-TP-002, Section 4.3 answers the question. For completeness, another citation should be stated. The citation is CCP-TP-002, Attachment 2 (CCP Waste Stream Profile Form).

   Response: The C6 question citation was corrected to add the citation as recommended in the comment.

4. Question 314 of the C6 Checklist contains four bullets; Precision, Accuracy, Completeness, Comparability. All four bullets are addressed in the procedure column and Objective Evidence column with the exception of Accuracy. Accuracy is not addressed in the Objective Evidence column. Accuracy must be addressed or a comment must be included to explain the omission.

   Response: The C6 question citation was corrected for the Objective Evidence column response for Accuracy.

Table C6-1 Waste Analysis Plan (WAP) Checklist
SNL/CCP Closeout Audit A-12-15
August 14-16, 2012

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

	WAP Requirement[1] *SNL/CCP* Audit *A-12-15* 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)	CCP-PO-001, S. C-0a CCP-TP-005, S. 4.4.11 NOTE above	Y	AK Summary Report for SNL/NM RH Hot Cell Facility TRU Waste (Debris), Waste Stream SNL-HCF-S5400-RH, CCP-AK-SNL-500 R4 **(AK-1)**	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)	CCP-TP-005, S. 4.4.14 S. 4.4.15 CCP-TP-002, S. 4.3 Att. 2	Y	AK Summary Report for SNL/NM RH Hot Cell Facility TRU Waste (Debris), Waste Stream SNL-HCF-S5400-RH, CCP-AK-SNL-500 R4, S. 2.0 **(AK-1)** Waste Stream Profile Form and attachments for waste stream SNL-HCF-S5400-RH **(AK-2)**	Y	
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)	CCP-TP-005, S. 4.4.13 NOTE Above CCP-TP-002, S. 4.3 Att. 2	Y	AK Summary Report for SNL/NM RH Hot Cell Facility TRU Waste (Debris), Waste Stream SNL-HCF-S5400-RH, CCP-AK-SNL-500 R4, S. 2.0 **(AK-1)** Waste Stream Profile Form and attachments for waste stream SNL-HCF-S5400-RH **(AK-2)**	Y	
4	Are procedures in place to ensure that the generator/storage site assigns a Waste Stream WIPP Identifier (ID) to each waste stream?	CCP-TP-002, S. 4.3	Y	Waste Stream Profile Form and attachments	Y	

	WAP Requirement[1] *SNL/CCP* Audit *A-12-15* 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	
	(Section C3-12b(1))	Att. 2		for waste stream SNL-HCF-S5400-RH **(AK-2)**		
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)	CCP-TP-005, S. 4.7	Y	N/A	N/A	No sufficiency determination request was submitted for this waste stream.
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)	CCP-PO-001, S. C-0b CCP-TP-001, S. 3.1 CCP-TP-002, (ALL) CCP-TP-005, S. 4.7 CCP-TP-500,	Y	RHSNLVE110002 RHSNLVE110003 RHSNLVE110004 RHSNLVE110006 SNLRHVE11007 SNLRHVE11008 SNLRHVE11009 SNLRHVE11010 **(GEN-1)** SNHSG1102	Y	

	WAP Requirement[1] *SNL/CCP* Audit *A-12-15* 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	
		(ALL)		ECL11034M **(GEN-2)**		
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)	CCP-TP-002, S. 1.1	Y	CP:12:01056 - Transmittal of Waste Stream Profile Form for Waste Stream SNL-HCF-S5400-RH, Sandia National Laboratory **(GEN-3)** CP:12:01203 – Transmittal of Characterization Information Summary for Remote-Handled Lot 2 SNL-HCF-S5400-RH at the Sandia National Laboratory **(GEN-4)**	Y	
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)	CCP-PO-001, S. C-1a CCP-TP-002, (ALL)	Y	CP:12:01056 - Transmittal of Waste Stream Profile Form for Waste Stream SNL-HCF-S5400-RH, Sandia National Laboratory **(GEN-3)** CP:12:01203 – Transmittal of Characterization Information Summary for Remote-Handled Lot 2 SNL-HCF-S5400-RH at the Sandia National Laboratory **(GEN-4)**	Y	
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?	CCP-TP-005, S. 4.4.16- 4.4.21 Att. 5	Y	AK Summary Report for SNL/NM RH Hot Cell Facility TRU Waste (Debris), Waste Stream SNL-HCF-S5400-RH, CCP-AK-SNL-500 R4, S. 5.3.3, Tables 6 and 7 **(AK-1)**	Y	

	WAP Requirement[1] *SNL/CCP* Audit *A-12-15* 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	
	(Section C-1b)			AK Att. 5, Hazardous Constituents, for waste stream SNL-HCF-S5400-RH **(AK-7)**		
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)	CCP-TP-005, S. 4.4.14	Y	AK Summary Report for SNL/NM RH Hot Cell Facility TRU Waste (Debris), Waste Stream SNL-HCF-S5400-RH, CCP-AK-SNL-500 R4, S. 2.0 **(AK-1)** Waste Stream Profile Form and attachments for waste stream SNL-HCF-S5400-RH **(AK-2)**	Y	

	WAP Requirement[1] *SNL/CCP* Audit *A-12-15* 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)	**AK** CCP-TP-005, S. 4.4.16 S. 4.4.17 S. 4.4.27 S. 4.4.31 S. 4.4.34 [K], [L] & [M] CCP-TP-500, S. 4.4 PL CCP-TP-001, S. 4.2 CCP-TP-002, S. 4 CCP-TP-500, S. 4.4	Y	Bullet 1- AK Summary Report for SNL/NM RH Hot Cell Facility TRU Waste (Debris), Waste Stream SNL-HCF-S5400-RH, CCP-AK-SNL-500 R4, S. 5.3.3.4, 5.3.3.5, 5.3.4 **(AK-1)** AK Att. 6, Waste Form, Waste Material Parameters, Prohibited Items and Packaging for waste stream SNL-HCF-S5400-RH **(AK-8)** SNLRHVE11007 **(AK-15)** SNLRHVE11008 **(AK-16)** SNLRHVE11010 **(AK-17)** Bulllets 2 & 3- AK Summary Report for SNL/NM RH Hot Cell Facility TRU Waste (Debris), Waste Stream SNL-HCF-S5400-RH, CCP-AK-SNL-500 R4, S. 5.3.3, Tables 6 and 7 **(AK-1)** AK Att. 5, Hazardous Constituents, for waste stream SNL-HCF-S5400-RH **(AK-7)** Bullet 4- AK Summary Report for SNL/NM RH Hot Cell Facility TRU Waste (Debris), Waste Stream SNL-HCF-S5400-RH, CCP-AK-SNL-500	Y	

	WAP Requirement[1] *SNL/CCP* Audit *A-12-15* 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	
				R4, S. 5.3.1.2, Table 2 **(AK-1)** Memo attached to AK Att. 6, Waste Form, Waste Material Parameters, Prohibited Items and Packaging for waste stream SNL-HCF-S5400-RH **(AK-8)** RHSNLVE110002 RHSNLVE110003 RHSNLVE110004 RHSNLVE110006 SNLRHVE11007 SNLRHVE11008 SNLRHVE11009 SNLRHVE11010 **(GEN-1)** SNHSG1102 ECL11034M **(GEN-2)** CP:12:01056 - Transmittal of Waste Stream Profile Form for Waste Stream SNL-HCF-S5400-RH, Sandia National Laboratory **(GEN-3)** CP:12:01203 – Transmittal of Characterization Information Summary for Remote-Handled Lot 2 SNL-HCF-S5400-RH at the Sandia National Laboratory **(GEN-4)**		
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)	CCP-TP-005, S. 4.4.31 and 4.4.34 [K] CCP-TP-001, S. 2.7 & 4.0	Y	AK Summary Report for SNL/NM RH Hot Cell Facility TRU Waste (Debris), Waste Stream SNL-HCF-S5400-RH, CCP-AK-SNL-500 R4,	Y	

	WAP Requirement[1] *SNL/CCP* Audit *A-12-15* 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	
		CCP-TP-500, S. 4.4		S. 5.3.4 **(AK-1)** AK Att. 6, Waste Form, Waste Material Parameters, Prohibited Items and Packaging for waste stream SNL-HCF-S5400-RH **(AK-8)** SNLRHVE11007 **(AK-15)** SNLRHVE11008 **(AK-16)** SNLRHVE11010 **(AK-17)** IDC Database with "reject" field **(AK-10)**		
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)	**AK** CCP-TP-005, S. 4.4 S. 4.5 PL CCP-PO-001, S. C-3 CCP-TP-005, S. 4.4 and 4.5 CCP-TP-001, S. 4.2 CCP-TP-002, S. 4.2 CCP-TP-500, S. 4.4	Y	AK Summary Report for SNL/NM RH Hot Cell Facility TRU Waste (Debris), Waste Stream SNL-HCF-S5400-RH, CCP-AK-SNL-500 R4, **(AK-1)** SNLRHVE11007 **(AK-15)** SNLRHVE11008 **(AK-16)** SNLRHVE11010 **(AK-17)** SNHSG1102 **(AK-18)** ECL11034M **(AK-19)** RHSNLVE110002 RHSNLVE110003 RHSNLVE110004	Y	

	WAP Requirement[1] *SNL/CCP* Audit *A-12-15* 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	
				RHSNLVE110006 SNLRHVE11007 SNLRHVE11008 SNLRHVE11009 SNLRHVE11010 **(GEN-1)** SNHSG1102 ECL11034M **(GEN-2)** CP:12:01056 - Transmittal of Waste Stream Profile Form for Waste Stream SNL-HCF-S5400-RH, Sandia National Laboratory **(GEN-3)** CP:12:01203 – Transmittal of Characterization Information Summary for Remote-Handled Lot 2 SNL-HCF-S5400-RH at the Sandia National Laboratory **(GEN-4)**		
	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
		CCP-TP-001, S. 4.2
		CCP-TP-002, Att. 1 and 2
		CCP-TP-500, S. 4.3, 4.4, Att. 1 and 2
			Y	RHSNLVE110002
				RHSNLVE110003
				RHSNLVE110004
				RHSNLVE110006
				SNLRHVE11007
				SNLRHVE11008
				SNLRHVE11009
				SNLRHVE11010
				(GEN-1)
				SNHSG1102
				ECL11034M
				(GEN-2)
				CP:12:01056 - Transmittal of Waste Stream Profile Form for Waste Stream SNL-HCF-S5400-RH, Sandia
					Y	

	WAP Requirement[1] *SNL/CCP* Audit *A-12-15* 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	
	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)			National Laboratory **(GEN-3)** CP:12:01203 – Transmittal of Characterization Information Summary for Remote-Handled Lot 2 SNL-HCF-S5400-RH at the Sandia National Laboratory **(GEN-4)**		
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)	CCP-TP-001, S. 4.2 CCP-TP-002, Att. 1 and 2 CCP-TP-500, S. 4.3, 4.4, Att. 1 and 2	Y	RHSNLVE110002 RHSNLVE110003 RHSNLVE110004 RHSNLVE110006 SNLRHVE11007 SNLRHVE11008 SNLRHVE11009 SNLRHVE11010 **(GEN-1)** SNHSG1102 ECL11034M **(GEN-2)** CP:12:01056 - Transmittal of Waste Stream Profile Form for Waste Stream SNL-HCF-S5400-RH, Sandia National Laboratory **(GEN-3)** CP:12:01203 – Transmittal of Characterization Information Summary for Remote-Handled Lot 2 SNL-HCF-S5400-RH at the Sandia National Laboratory **(GEN-4)**	Y	
	WASTE ACCEPTANCE CONTROL					
14	Are procedures in place to ensure that the generator/storage site uses a Waste	CCP-TP-002,	Y	CP:12:01056 -	Y	

	WAP Requirement[1] *SNL/CCP* Audit *A-12-15* 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	
	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)	(ALL)		Transmittal of Waste Stream Profile Form for Waste Stream SNL-HCF-S5400-RH, Sandia National Laboratory **(GEN-3)** CP:12:01203 – Transmittal of Characterization Information Summary for Remote-Handled Lot 2 SNL-HCF-S5400-RH at the Sandia National Laboratory **(GEN-4)**		
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)	CCP-TP-002, (ALL)	Y	CP:12:01056 - Transmittal of Waste Stream Profile Form for Waste Stream SNL-HCF-S5400-RH, Sandia National Laboratory **(GEN-3)** CP:12:01203 – Transmittal of Characterization Information Summary for Remote-Handled Lot 2 SNL-HCF-S5400-RH at the Sandia National Laboratory **(GEN-4)**	Y	
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)	CCP-TP-002, S. 4.7	Y	N/A	N/A	There were no revisions to the waste stream profile form and attachments for this waste stream
	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))	N/A	N/A	N/A	N/A	SNL/CCP only performs HSG sampling. Analysis is performed at INL/CCP Lab.

	WAP Requirement[1] *SNL/CCP* Audit *A-12-15* 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	
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))	N/A	N/A	N/A	N/A	SNL/CCP only performs HSG sampling. Analysis is performed at INL/CCP Lab.
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))	N/A	N/A	N/A	N/A	SNL/CCP only performs HSG sampling. Analysis is performed at INL/CCP Lab.
	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))	CCP-TP-005, S. 4.5.3	Y	SNHSG1102 ECL11034M **(GEN-2)** CP:12:01056 - Transmittal of Waste Stream Profile Form for Waste Stream SNL-HCF-S5400-RH, Sandia National Laboratory **(GEN-3)** CP:12:01203 – Transmittal of Characterization Information Summary for Remote-Handled Lot 2 SNL-HCF-S5400-RH at the Sandia National Laboratory **(GEN-4)**	Y	
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	CCP-TP-002, Att. 5 and 6 CCP-TP-003,	Y	SNHSG1102 ECL11034M	Y	HG: SNL/CCP only performs HSG sampling. Analysis is performed at INL/CCP Lab.

	WAP Requirement[1]. *SNL/CCP* Audit *A-12-15* 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	
	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))	S. 4.3		**(GEN-2)** CP:12:01056 - Transmittal of Waste Stream Profile Form for Waste Stream SNL-HCF-S5400-RH, Sandia National Laboratory **(GEN-3)** CP:12:01203 – Transmittal of Characterization Information Summary for Remote-Handled Lot 2 SNL-HCF-S5400-RH at the Sandia National Laboratory **(GEN-4)** HG: N/A		
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))	CCP-TP-162, (ALL)	Y	N/A	N/A	Solids and Soil/Gravel are not in the scope of this audit.
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	Solids and Soil/Gravel are not in the scope of this audit.
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)	**AK** CCP-TP-005, S. 4.4.11 S. 4.4.16 S. 4.4.17 S. 4.4.27 S. 4.4.31 S. 4.4.34 [K], [L] and [M] CCP-TP-500, S. 4.3, 4.4, Att. 1 and 2	Y	AK Summary Report for SNL/NM RH Hot Cell Facility TRU Waste (Debris), Waste Stream SNL-HCF-S5400-RH, CCP-AK-SNL-500 R4, S. 2.0 **(AK-1)** AK Summary Report for SNL/NM RH Hot Cell Facility TRU Waste (Debris), Waste Stream	Y	

	WAP Requirement[1] *SNL/CCP* Audit *A-12-15* 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	
				SNL-HCF-S5400-RH, CCP-AK-SNL-500 R4, S. 5.3.3.4, 5.3.3.5, 5.3.4 **(AK-1)** AK Att. 6, Waste Form, Waste Material Parameters, Prohibited Items and Packaging for waste stream SNL-HCF-S5400-RH **(AK-8)** SNLRHVE11007 **(AK-15)** SNLRHVE11008 **(AK-16)** SNLRHVE11010 **(AK-17)** AK Summary Report for SNL/NM RH Hot Cell Facility TRU Waste (Debris), Waste Stream SNL-HCF-S5400-RH, CCP-AK-SNL-500 R4, S. 5.3.3, Tables 6 and 7 **(AK-1)** AK Att. 5, Hazardous Constituents, for waste stream SNL-HCF-S5400-RH **(AK-7)** AK Summary Report for SNL/NM RH Hot Cell Facility TRU Waste (Debris), Waste Stream SNL-HCF-S5400-RH, CCP-AK-SNL-500 R4, S. 5.3.1.2, Table 2 **(AK-1)** Memo attached to AK Att. 6, Waste Form, Waste Material Parameters, Prohibited Items and		

	WAP Requirement[1] *SNL/CCP* Audit *A-12-15* 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	
				Packaging for waste stream SNL-HCF-S5400-RH **(AK-8)**		
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)	CCP-TP-500, S. 1.1 and Att. 1	Y	RHSNLVE100001 RHSNLVE110001 RHSNLVE110002 RHSNLVE110003 RHSNLVE110004 RHSNLVE110006 SNLRHVE11007 SNLRHVE11008 SNLRHVE11009 SNLRHVE11010 **(VE-1)**	Y	
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))	**AK** CCP-TP-005, S. 4.4 S. 4.5 PL CCP-TP-002, (ALL) CCP-TP-162, (ALL)	Y	N/A	N/A	No newly generated wastes for were reported for this site.
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))	CCP-TP-500, Att. 1	Y	RHSNLVE100001 RHSNLVE110001 RHSNLVE110002 RHSNLVE110003 RHSNLVE110004 RHSNLVE110006 SNLRHVE11007 SNLRHVE11008 SNLRHVE11009 SNLRHVE11010	Y	

	WAP Requirement[1] *SNL/CCP* Audit *A-12-15* 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	
				(VE-1)		
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))	AK CCP-TP-005, S. 4.4 S. 4.5 PL CCP-TP-002, (ALL) CCP-TP-162, (ALL)	Y	AK Summary Report for SNL/NM RH Hot Cell Facility TRU Waste (Debris), Waste Stream SNL-HCF-S5400-RH, CCP-AK-SNL-500 R4, **(AK-1)** SNLRHVE11007 **(AK-15)** SNLRHVE11008 **(AK-16)** SNLRHVE11010 **(AK-17)** SNHSG1102 **(AK-18)** ECL11034M **(AK-19)** Random Container Selection Memo for HSG Sampling and Analysis Lot 2 **(AK13)** HSG Summary Report Lot 2 **(AK-14)** Waste Stream Characterization Checklists **(AK-20)** PL RHSNLVE110002 RHSNLVE110003 RHSNLVE110004 RHSNLVE110006 SNLRHVE11007 SNLRHVE11008 SNLRHVE11009 SNLRHVE11010 **(GEN-1)** SNHSG1102 ECL11034M **(GEN-2)**	Y	

	WAP Requirement[1] *SNL/CCP* Audit *A-12-15* 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	
				CP:12:01056 - Transmittal of Waste Stream Profile Form for Waste Stream SNL-HCF-S5400-RH, Sandia National Laboratory **(GEN-3)** CP:12:01203 – Transmittal of Characterization Information Summary for Remote-Handled Lot 2 SNL-HCF-S5400-RH at the Sandia National Laboratory **(GEN-4)** CP:11:01176 – Headspace Gas Random Sample Selection Memorandum for Waste Stream SNL-HCF-S5400-RH, Lot 1, Characterized by the Central Characterization Project at the Sandia National Laboratory CP:11:01177 – Subsequent Headspace Gas Random Sample Selection Memorandum for Waste Stream SNL-HCF-S5400-RH, Lot 2, Characterized by the Central Characterization Project at the Sandia National Laboratory **(GEN-5)**		
	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	**AK** CCP-TP-005, S. 4.4.11 S. 4.4.16 S. 4.4.17	Y	AK Summary Report for SNL/NM RH Hot Cell Facility TRU Waste (Debris), Waste Stream SNL-HCF-S5400-RH,	Y	

	WAP Requirement[1] *SNL/CCP* Audit *A-12-15* 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	
	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))	S. 4.4.27 S. 4.4.31 S. 4.4.34 [K], [L] and [M] CCP-TP-500, S. 4.4 PL CCP-TP-002, (ALL)		CCP-AK-SNL-500 R4, S. 2.0 **(AK-1)** AK Summary Report for SNL/NM RH Hot Cell Facility TRU Waste (Debris), Waste Stream SNL-HCF-S5400-RH, CCP-AK-SNL-500 R4, S. 5.3.3.4, 5.3.3.5, 5.3.4 **(AK-1)** AK Att. 6, Waste Form, Waste Material Parameters, Prohibited Items and Packaging for waste stream SNL-HCF-S5400-RH **(AK-8)** SNLRHVE11007 **(AK-15)** SNLRHVE11008 **(AK-16)** SNLRHVE11010 **(AK-17)** AK Summary Report for SNL/NM RH Hot Cell Facility TRU Waste (Debris), Waste Stream SNL-HCF-S5400-RH, CCP-AK-SNL-500 R4, S. 5.3.3, Tables 6 and 7 **(AK-1)** AK Att. 5, Hazardous Constituents, for waste stream SNL-HCF-S5400-RH **(AK-7)** AK Summary Report for SNL/NM RH Hot Cell Facility TRU Waste (Debris), Waste Stream SNL-HCF-S5400-RH,		

	WAP Requirement[1] *SNL/CCP* Audit *A-12-15* 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	
				CCP-AK-SNL-500 R4, S. 5.3.1.2, Table 2 **(AK-1)** Memo attached to AK Att. 6, Waste Form, Waste Material Parameters, Prohibited Items and Packaging for waste stream SNL-HCF-S5400-RH **(AK-8)** **PL** RHSNLVE110002 RHSNLVE110003 RHSNLVE110004 RHSNLVE110006 SNLRHVE11007 SNLRHVE11008 SNLRHVE11009 SNLRHVE11010 **(GEN-1)** SNHSG1102 ECL11034M **(GEN-2)** CP:12:01056 - Transmittal of Waste Stream Profile Form for Waste Stream SNL-HCF-S5400-RH, Sandia National Laboratory **(GEN-3)** CP:12:01203 – Transmittal of Characterization Information Summary for Remote-Handled Lot 2 SNL-HCF-S5400-RH at the Sandia National Laboratory **(GEN-4)**		
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	HG: CCP-TP-106, Att. 3 VE:	Y	HG: Examined HSGS BDR SNHSG1102, p. 3-4 **(HG-1)** VE:	Y	

	WAP Requirement[1] *SNL/CCP* Audit *A-12-15* 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	
	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))	CCP-TP-500, Att. 2 and 3		RHSNLVE100001 RHSNLVE110001 RHSNLVE110002 RHSNLVE110003 RHSNLVE110004 RHSNLVE110006 SNLRHVE11007 SNLRHVE11008 SNLRHVE11009 SNLRHVE11010 **(VE-1)**		
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)	HG: CCP-TP-106, S. 4.1, 5.0 Atts. 2 and 3 VE: CCP-TP-500, S. 4.3, 4.4, 5.0, Atts.1 and 2	Y	HG: Examined HSGS BDR SNHSG1102 Bullet 1: All Bullet 2: p. 3-4 **(HG-1)** VE: RHSNLVE100001 RHSNLVE110001 RHSNLVE110002 RHSNLVE110003 RHSNLVE110004 RHSNLVE110006 SNLRHVE11007 SNLRHVE11008 SNLRHVE11009 SNLRHVE11010 **(VE-1)**	Y	
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)	HG: CCP-TP-106, S. 4.1 and Att. 3 PL: CCP-TP-001, S. 4.2 CCP-TP-500, S. 4.4 VE: CCP-TP-500, Atts. 2 and 3	Y	HG: Examined HSGS BDR SNHSG1102, p. 3-4 **(HG-1)** **PL:** RHSNLVE110002 RHSNLVE110003 RHSNLVE110004 RHSNLVE110006 SNLRHVE11007 SNLRHVE11008 SNLRHVE11009 SNLRHVE11010	Y	

	WAP Requirement[1] *SNL/CCP* Audit *A-12-15* 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	
				(GEN-1) SNHSG1102 ECL11034M **(GEN-2)** VE: RHSNLVE100001 RHSNLVE110001 RHSNLVE110002 RHSNLVE110003 RHSNLVE110004 RHSNLVE110006 SNLRHVE11007 SNLRHVE11008 SNLRHVE11009 SNLRHVE11010 **(VE-1)**		
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))	HG: CCP-TP-106, S. 4.1, Atts. 2 and 3 PL: CCP-TP-001, S. 4.2 CCP-TP-500, S. 4.4 VE: CCP-TP-500, Atts. 1 and 2	Y	HG: Examined HSGS BDR SNHSG1102 **(HG-1)** **PL:** RHSNLVE110002 RHSNLVE110003 RHSNLVE110004 RHSNLVE110006 SNLRHVE11007 SNLRHVE11008 SNLRHVE11009 SNLRHVE11010 **(GEN-1)** SNHSG1102 ECL11034M **(GEN-2)** CP:12:01056 - Transmittal of Waste Stream Profile Form for Waste Stream SNL-HCF-S5400-RH, Sandia National Laboratory **(GEN-3)** CP:12:01203 – Transmittal of Characterization Information Summary for Remote-Handled Lot 2 SNL-HCF-S5400-RH at	Y	

	WAP Requirement[1] *SNL/CCP* Audit *A-12-15* 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	
				the Sandia National Laboratory **(GEN-4)** VE: RHSNLVE100001 RHSNLVE110001 RHSNLVE110002 RHSNLVE110003 RHSNLVE110004 RHSNLVE110006 SNLRHVE11007 SNLRHVE11008 SNLRHVE11009 SNLRHVE11010 **(VE-1)**		
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))	HG: CCP-TP-106, S. 4.1; Atts. 2 and 3 PL: CCP-TP-001, S. 4.2 CCP-TP-500, S. 4.4 VE: CCP-TP-500, S. 4.3.2	Y	HG: Examined HSGS BDR SNHSG1102 **(HG-1)** PL: RHSNLVE110002 RHSNLVE110003 RHSNLVE110004 RHSNLVE110006 SNLRHVE11007 SNLRHVE11008 SNLRHVE11009 SNLRHVE11010 **(GEN-1)** SNHSG1102 ECL11034M **(GEN-2)** VE: RHSNLVE100001 RHSNLVE110001 RHSNLVE110002 RHSNLVE110003 RHSNLVE110004 RHSNLVE110006 SNLRHVE11007 SNLRHVE11008 SNLRHVE11009 SNLRHVE11010 **(VE-1)**	Y	

	WAP Requirement[1] *SNL/CCP* Audit *A-12-15* 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)	HG: CCP-TP-106, S. 4.1; Atts. 2 and 3; S. 5.0 VE: CCP-TP-500, S. 5.0 and Att. 2	Y	~~HG~~: Examined HSGS BDR SNHSG1102 **(HG-1)** VE: RHSNLVE100001 RHSNLVE110001 RHSNLVE110002 RHSNLVE110003 RHSNLVE110004 RHSNLVE110006 SNLRHVE11007 SNLRHVE11008 SNLRHVE11009 SNLRHVE11010 **(VE-1)**	Y	
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	HG: CCP-TP-106, S. 4.1 and Att. 3 VE: CCP-TP-500, Att. 2	Y	HG: Examined HSGS BDR SNHSG1102 **(HG-1)** VE: RHSNLVE100001 RHSNLVE110001 RHSNLVE110002 RHSNLVE110003 RHSNLVE110004 RHSNLVE110006 SNLRHVE11007 SNLRHVE11008 SNLRHVE11009 SNLRHVE11010 **(VE-1)**	Y	

	WAP Requirement[1] *SNL/CCP* Audit *A-12-15* 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 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))					
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	CCP-TP-001, S. 4.2 CCP-TP-162, (ALL) CCP-TP-500, S. 4.4	Y	RHSNLVE110002 RHSNLVE110003 RHSNLVE110004 RHSNLVE110006 SNLRHVE11007 SNLRHVE11008 SNLRHVE11009 SNLRHVE11010 **(GEN-1)** SNHSG1102 ECL11034M **(GEN-2)** CP:12:01056 - Transmittal of Waste Stream Profile Form for Waste Stream SNL-HCF-S5400-RH, Sandia National Laboratory **(GEN-3)** CP:12:01203 – Transmittal of Characterization Information Summary for Remote-Handled Lot 2 SNL-HCF-S5400-RH at the Sandia National Laboratory **(GEN-4)**	Y	SPM review of SNLRHVE11007 indicated additional information to the checklist and the SPM did not document the page number per CCP-TP-001 S. 4.2.18.

	WAP Requirement[1] *SNL/CCP* Audit *A-12-15* 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	
	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))			CP:11:01176 – Headspace Gas Random Sample Selection Memorandum for Waste Stream SNL-HCF-S5400-RH, Lot 1, Characterized by the Central Characterization Project at the Sandia National Laboratory CP:11:01177 – Subsequent Headspace Gas Random Sample Selection Memorandum for Waste Stream SNL-HCF-S5400-RH, Lot 2, Characterized by the Central Characterization Project at the Sandia National Laboratory **(GEN-5)**		
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)	CCP-TP-001, S. 4.3	Y	CP:11:01208 – First Quarter 2011 Visual Examination Quarterly Repeat of Data Generation Level Review at the Sandia National Laboratory – Remote-Handled CP:11:01413 – Results of Visual Examination Quarterly Repeat of Data Generation Level Review at the Sandia National Laboratory – Remote-Handled First Quarter of 2011 CP:11:01477 – Second Quarter 2011 Visual Examination Quarterly Repeat of Data Generation Level Review at the Sandia National Laboratory – Remote-Handled	Y	

	WAP Requirement[1] *SNL/CCP* Audit *A-12-15* 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	
				CP:11:01495 - Results of Visual Examination Quarterly Repeat of Data Generation Level Review at the Sandia National Laboratory – Remote-Handled Second Quarter of 2011 CP:11:01646 – Third Quarter 2011 Visual Examination Quarterly Repeat of Data Generation Level Review at the Sandia National Laboratory – Remote-Handled CP:11:01682 - Results of Visual Examination Quarterly Repeat of Data Generation Level Review at the Sandia National Laboratory – Remote-Handled Third Quarter of 2011 CP:11:01647 – Third Quarter 2011 Headspace Gas Sampling Quarterly Repeat of Data Generation Level Review at the Sandia National Laboratory – Remote-Handled CP:11:01712 – Results of Headspace Gas Sampling Quarterly Repeat Data Generation Level Data Review: Sandia National Laboratories – Remote Handled Third Calendar Quarter of 2011 CP:12:01011 - Fourth Quarter 2011 Headspace Gas Sampling Quarterly		

	WAP Requirement[1] *SNL/CCP* Audit *A-12-15* 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	
				Repeat of Data Generation Level Review at the Sandia National Laboratory – Remote Handled CP:12:01258 – Results of Headspace Gas Sampling Quarterly Repeat Data Generation Level Data Review: Sandia National Laboratories-Remote Handled Fourth Calendar Quarter of 2011 **(GEN-6)**		
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))	CCP-TP-001, S. 3.1.6, 3.1.8, and 4.2 CCP-TP-500, S. 4.4	Y	RHSNLVE110002 RHSNLVE110003 RHSNLVE110004 RHSNLVE110006 SNLRHVE11007 SNLRHVE11008 SNLRHVE11009 SNLRHVE11010 **(GEN-1)** SNHSG1102 ECL11034M **(GEN-2)**	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)	CCP-QP-005, S. 2.4.1 and S. 2.4.2	Y	There were no reportable RH NCRs since the previous recertification audit. RH SNL Data Generation Level and RH SNL Project Level NCR Log and Reconciliation Reports for 2011 **(GEN-9)**	Y	Verified that there were no NCRs that needed to be reported to the Permittee (via email to CBFO through "WIPP Notify") within the required amount of days by the Permit.
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	CCP-QP-005, (ALL)	Y	Records packages for the following NCRs: NCR-RHSNL-2345-11, NCR-RHSNL-2346-11, NCR-RHSNL-2347-11, NCR-RHSNL-2348-11,	Y	

	WAP Requirement[1] *SNL/CCP* Audit *A-12-15* 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	
	process? (Section C3-13)			NCR-RHSNL-2349-11, NCR-RHSNL-2350-11, NCR-RHSNL-2351-11, NCR-RHSNL-2352-11, NCR-RHSNL-2353-11, NCR-RHSNL-2354-11, NCR-RHSNL-3216-11, NCR-RHSNL-2317-11 **(GEN-10)**		
	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))	HG: CCP-TP-093, S. 4.4.4, S. 4.5, and Att. 1	Y	HG: Examined HSGS BDR SNHSG1102, p. 5-18 **(HG-1)**	Y	
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))	HG: CCP-TP-093, S. 4 and Att. 1	Y	HG: Examined HSGS BDR SNHSG1102, p. 5-6 **(HG-1)**	Y	
	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))	CCP-TP-001, S. 4.2 and 4.2.1 CCP-TP-500, S. 4.3.8, 4.3.9, and 4.4	Y	RHSNLVE110002 RHSNLVE110003 RHSNLVE110004 RHSNLVE110006 SNLRHVE11007 SNLRHVE11008 SNLRHVE11009 SNLRHVE11010 **(GEN-1)** SNHSG1102 ECL11034M	Y	

	WAP Requirement[1] *SNL/CCP* Audit *A-12-15* 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	
				(GEN-2)		
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))	CCP-TP-530, (ALL)	Y	Characterization data packages for the following containers were reviewed including CCP data spreadsheet reports, pages from batch data reports showing analyses values, and WWIS/WDS Container Data Reports. RH Package for Canister SNLNM0007 including three containers: SNLNM007018 SNLNM007025 SNLNM007099 **(GEN-11)**	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))	CCP-TP-530, (ALL)	Y	Characterization data packages for the following containers were reviewed including CCP data spreadsheet reports, pages from batch data reports showing analyses values, and WWIS/WDS Container Data Reports. RH Package for Canister SNLNM0007 including three containers: SNLNM007018 SNLNM007025 SNLNM007099 **(GEN-11)**	Y	
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))	N/A	N/A	N/A	N/A	SNL/CCP does not composite headspace gas samples.
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)	CCP-TP-530, (ALL)	Y	Characterization data packages for the following containers were reviewed including CCP	Y	

	WAP Requirement[1] *SNL/CCP* Audit *A-12-15* 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 spreadsheet reports, pages from batch data reports showing analyses values, and WWIS/WDS Container Data Reports. RH Package for Canister SNLNM0007 including three containers: SNLNM007018 SNLNM007025 SNLNM007099 **(GEN-11)**		
	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))	CCP-TP-001, S. 4.2 CCP-TP-500, S. 4.4	Y	RHSNLVE110002 RHSNLVE110003 RHSNLVE110004 RHSNLVE110006 SNLRHVE11007 SNLRHVE11008 SNLRHVE11009 SNLRHVE11010 **(GEN-1)** SNHSG1102 ECL11034M **(GEN-2)** CP:12:01056 - Transmittal of Waste Stream Profile Form for Waste Stream SNL-HCF-S5400-RH, Sandia National Laboratory **(GEN-3)** CP:12:01203 – Transmittal of Characterization Information Summary for Remote-Handled Lot 2 SNL-HCF-S5400-RH at the Sandia National Laboratory **(GEN-4)**	Y	

	WAP Requirement[1] *SNL/CCP* Audit *A-12-15* 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))	CCP-TP-002, S. 4.3 and Att. 2	Y	CP:12:01056 - Transmittal of Waste Stream Profile Form for Waste Stream SNL-HCF-S5400-RH, Sandia National Laboratory **(GEN-3)** CP:12:01203 – Transmittal of Characterization Information Summary for Remote-Handled Lot 2 SNL-HCF-S5400-RH at the Sandia National Laboratory **(GEN-4)**	Y	
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).	CCP-TP-002, S. 4.4	Y	RHSNLVE110002 RHSNLVE110003 RHSNLVE110004 RHSNLVE110006 SNLRHVE11007 SNLRHVE11008 SNLRHVE11009 SNLRHVE11010 **(GEN-1)** SNHSG1102 ECL11034M	Y	

	WAP Requirement[1] *SNL/CCP* Audit *A-12-15* 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	
	• 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))			**(GEN-2)** CP:12:01056 - Transmittal of Waste Stream Profile Form for Waste Stream SNL-HCF-S5400-RH, Sandia National Laboratory **(GEN-3)** CP:12:01203 – Transmittal of Characterization Information Summary for Remote-Handled Lot 2 SNL-HCF-S5400-RH at the Sandia National Laboratory **(GEN-4)**		
56b	Are procedures in place to assure that ongoing container characterization results are cross referenced to Batch Data Reports? (Section C3-12b)	CCP-TP-002, S. 4.4	Y	RHSNLVE110002 RHSNLVE110003 RHSNLVE110004 RHSNLVE110006 SNLRHVE11007 SNLRHVE11008 SNLRHVE11009 SNLRHVE11010 **(GEN-1)** SNHSG1102 ECL11034M **(GEN-2)** CP:12:01056 - Transmittal of Waste	Y	

	WAP Requirement[1] *SNL/CCP* Audit *A-12-15* 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	
				Stream Profile Form for Waste Stream SNL-HCF-S5400-RH, Sandia National Laboratory **(GEN-3)** CP:12:01203 – Transmittal of Characterization Information Summary for Remote-Handled Lot 2 SNL-HCF-S5400-RH at the Sandia National Laboratory **(GEN-4)**		
58	Are procedures in place to ensure that project level reports are compiled into Characterization Information Summaries? (Section C3-12b)	CCP-TP-002, S. 4.4	Y	RHSNLVE110002 RHSNLVE110003 RHSNLVE110004 RHSNLVE110006 SNLRHVE11007 SNLRHVE11008 SNLRHVE11009 SNLRHVE11010 **(GEN-1)** SNHSG1102 ECL11034M **(GEN-2)** CP:12:01056 - Transmittal of Waste Stream Profile Form for Waste Stream SNL-HCF-S5400-RH, Sandia National Laboratory **(GEN-3)** CP:12:01203 – Transmittal of Characterization Information Summary for Remote-Handled Lot 2 SNL-HCF-S5400-RH at the Sandia National Laboratory **(GEN-4)**	Y	

	WAP Requirement[1] *SNL/CCP* Audit *A-12-15* 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)	HG: CCP-TP-106, S. 4.1 Att. 1, 2, and 3 VE: CCP-TP-500, Att. 1 and 2	Y	HG: Examined HSGS BDR SNHSG1102 **(HG-1)** VE: RHSNLVE100001 RHSNLVE110001 RHSNLVE110002 RHSNLVE110003 RHSNLVE110004 RHSNLVE110006 SNLRHVE11007 SNLRHVE11008 SNLRHVE11009 SNLRHVE11010 **(VE-1)**	Y	

	WAP Requirement[1] *SNL/CCP* Audit *A-12-15* 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))	CCP-TP-002, S. 4.6	Y	RHSNLVE110002 RHSNLVE110003 RHSNLVE110004 RHSNLVE110006 SNLRHVE11007 SNLRHVE11008 SNLRHVE11009 SNLRHVE11010 **(GEN-1)** SNHSG1102 ECL11034M **(GEN-2)** CP:12:01056 - Transmittal of Waste Stream Profile Form for Waste Stream SNL-HCF-S5400-RH, Sandia National Laboratory **(GEN-3)** CP:12:01203 – Transmittal of Characterization Information Summary for Remote-Handled Lot 2 SNL-HCF-S5400-RH at the Sandia National Laboratory **(GEN-4)**	Y	
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)	CCP-TP-002, S. 4.3 and Att. 2	Y	RHSNLVE110002 RHSNLVE110003 RHSNLVE110004 RHSNLVE110006 SNLRHVE11007 SNLRHVE11008 SNLRHVE11009 SNLRHVE11010 **(GEN-1)** SNHSG1102 ECL11034M **(GEN-2)** CP:12:01056 - Transmittal of Waste	Y	

	WAP Requirement[1] *SNL/CCP* Audit *A-12-15* 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	
				Stream Profile Form for Waste Stream SNL-HCF-S5400-RH, Sandia National Laboratory **(GEN-3)** CP:12:01203 – Transmittal of Characterization Information Summary for Remote-Handled Lot 2 SNL-HCF-S5400-RH at the Sandia National Laboratory **(GEN-4)**		
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))	CCP-TP-002, S. 4.6	Y	CP:12:01056 - Transmittal of Waste Stream Profile Form for Waste Stream SNL-HCF-S5400-RH, Sandia National Laboratory **(GEN-3)** CP:12:01203 – Transmittal of Characterization Information Summary for Remote-Handled Lot 2 SNL-HCF-S5400-RH at the Sandia National Laboratory **(GEN-4)**	Y	
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))	CCP-QP-008, (ALL) CCP-QP-028, (ALL)	Y	RH Records Inventory and Distribution Schedule (RIDS) dated 07/23/2012 **(GEN-12)**	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)	CCP-PO-001, (ALL) CCP-QP-002, S. 4.0	Y	Qualification records for selected CCP personnel **(GEN-13)** RH Program – SNL List of Qualified Individuals dated 10/27/11 **(GEN-14)**	Y	

	WAP Requirement[1] *SNL/CCP* Audit *A-12-15* 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	
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))	CCP-QP-008, S. 4.10 CCP-QP-028, (ALL)	Y	RH Records Inventory and Distribution Schedule (RIDS) dated 07/23/2012 **(GEN-12)**	Y	
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))	CCP-QP-008, S. 3.1.2 CCP-QP-028, S. 3.1.1	Y	RH Records Inventory and Distribution Schedule (RIDS) dated 07/23/2012 **(GEN-12)**	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))	CCP-QP-008, S. 4.15.1 and (NOTE) CCP-QP-028, (ALL)	Y	RH Records Inventory and Distribution Schedule (RIDS) dated 07/23/2012 **(GEN-12)**	Y	
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)	CCP-PO-001, S. C-4a(7) and TABLE C-6 CCP-PO-002, S. 5.5 CCP-QP-008, (ALL) CCP-QP-028, (ALL)	Y	RH Records Inventory and Distribution Schedule (RIDS) dated 07/23/2012 **(GEN-12)**	Y	
69	Are procedures in place to ensure that the generator/storage site maintains records that are designated as Non-Permanent Records for ten years from the date of record generation, and then dispositioned according per the approved RIDS or transferred to the WIPP Records Archive facility? Non-Permanent Records include:	CCP-PO-001, S. C-4a(7), S. C-7, and Table C-6 CCP-PO-002, S. 5.5 CCP-QP-008,	Y	RH Records Inventory and Distribution Schedule (RIDS) dated 07/23/2012 **(GEN-12)**	Y	

	WAP Requirement[1] *SNL/CCP* Audit *A-12-15* 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	
	• Nonconformance documentation, • Variance documentation, • Assessment documentation, • Gas canister tags, • Methods performance documentation, • PDP documentation, • Sampling equipment certifications, • Calculations and related software documentation, • Training/qualification documentation, • QAPjP documentation (all revisions), • Calibration documentation, • Analytical raw data, • Procurement documentation, • QA procedures (all revisions), • Technical implementing procedures (all revisions), and • Audio/video recording (radiography, visual, etc.). (Section C-4a(7), Table C-6)	(ALL) CCP-QP-028, (ALL)				
70	Are procedures in place to ensure that the generator/storage site has raw data that is identifiable and legible, and provides documentary evidence of quality? (Section C-4a(7))	HG: CCP-TP-093, (ALL) CCP-TP-106, (ALL) VE: CCP-TP-500, Att. 1 and 2	Y	HG: Examined HSGS BDR SNHSG1102 **(HG-1)** VE: RHSNLVE100001 RHSNLVE110001 RHSNLVE110002 RHSNLVE110003 RHSNLVE110004 RHSNLVE110006 SNLRHVE11007 SNLRHVE11008 SNLRHVE11009 SNLRHVE11010 **(VE-1)**	Y	
71	Are procedures in place to ensure that if the generator/storage site ceases to	CCP-QP-008, S. 4.10.2	Y	RH Records Inventory and Distribution Schedule	Y	

	WAP Requirement[1] *SNL/CCP* Audit *A-12-15* 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	
	operate, that all records be transferred before closeout? (Section C-4a(7))			(RIDS) dated 07/23/2012 **(GEN-12)**		
	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)	CCP-TP-507, S. 4.2, 4.3, 4.4, and Att. 1	Y	Examined UHWMs: 001117535 JJK **(GEN-16)** 001117582 JJK **(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)	CCP-TP-507, S. 4.2, 4.3, 4.4, and Att. 1	Y	Examined UHWMs: 001117535 JJK **(GEN-16)** 001117582 JJK **(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.

Table C6-6 Visual Examination (VE) Checklist
SNL/CCP Recertification Audit A-12-15
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Visual Examination (VE) Checklist

	WAP Requirement[1] *SNL/CCP* Audit *A-12-15* Table C6-6 Visual Examination (VE) Checklist	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	
	TRAINING					
296	Is there documentation which shows that a standardized training program for visual examination operators has been developed? Is it specific to the site and include the various waste configurations generated/stored at the site? (Section C1-4)	CCP-QP-002, S. 4.1.2 and 4.3.8 CCP-TP-500, S. 2.2	Y	Qualification Cards and Training records **(VE-2)**	Y	
297	Is there documentation which shows that the visual examination operators receive training on the specific waste generating processes, typical packaging configurations, and waste material parameters expected to be found in each Waste Matrix Code at the site? (Section C1-4)	CCP-QP-002, S. 4.1.1 , 4.3.8 and 4.2 CCP-TP-500, S. 2.2	Y	Qualification Cards and Training records **(VE-2)**	Y	
298	Are the visual examination personnel requalified once every two years? (Section C1-4)	CCP-QP-002, S. 4.1.2 [F] CCP-TP-500, S. 2.2	Y	Qualification Cards and Training records **(VE-2)**	Y	
298a	Does the training include the following regardless of Summary Category Group? • Identifying and describing the contents of a waste container by examining all items in waste containers of previously packaged waste. • Identifying when VE cannot be used to meet the DQOs. (Section C1-4)	CCP-QP-002, S. 4.1.2 and 4.3.8 CCP-TP-002, S. 1.1 CCP-TP-500, S. 1.1	Y	Qualification Cards and Training records **(VE-2)**	Y	
	VISUAL EXAMINATION EXPERT REQUIREMENTS					
300	Does documentation ensure that the site has designated a visual examination expert? Is the visual examination expert familiar with the waste generating processes that have taken place at the site? Is the visual examination expert familiar with all of the types of waste being characterized at that site? (Section C1-4)	CCP-QP-002, S. 3.2.5, 4.4.1 and 4.4 (NOTE) CCP-TP-500, S. 3.3	Y	Qualification Cards and Training records Appointment letter for VEEs. **(VE-2)**	Y	
301	Does documentation ensure that the visual examination expert shall be responsible for the overall direction and implementation of the visual examination aspects of the program? Does the site's QAPjP specify the selection, qualification, and training requirements of the visual examination expert? (Section C1-4)	CCP-TP-500, S. 3.3.1 CCP-PO-001, S. C1-4	Y	Qualification Cards and Training records Appointment letter for VEEs. **(VE-2)**	Y	
	VISUAL EXAMINATION PROCEDURES					
304	Do procedures indicate that all visual examination activities are documented on	CCP-TP-500,	Y	BDRs	Y	

	WAP Requirement[1] *SNL/CCP* Audit *A-12-15* Table C6-6 Visual Examination (VE) Checklist	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	
	video/audio media or VE performed by using a second operator to provide additional verification by reviewing the contents of the waste container to ensure correct reporting? (Section C1-4)	S. 1.1 and Att. 1		RHSNLVE100001 RHSNLVE110001 RHSNLVE110002 RHSNLVE110003 RHSNLVE110004 RHSNLVE110006 SNLRHVE11007 SNLRHVE11008 SNLRHVE11009 SNLRHVE11010 **(VE-1)**		
304a	Are procedures in place to ensure that when VE is performed using a second operator, each operator performing VE shall observe for themselves the waste being placed in the container or the contents within the examined waste container when waste is not removed? (Section C1-4)	CCP-TP-500, S. 4.0 (NOTE) and Att. 1	Y	BDRs RHSNLVE100001 RHSNLVE110001 RHSNLVE110002 RHSNLVE110003 RHSNLVE110004 RHSNLVE110006 SNLRHVE11007 SNLRHVE11008 SNLRHVE11009 SNLRHVE11010 **(VE-1)**	Y	
313	Do site procedures ensure that when liquid is found, the non-transparent internal container holding the liquid will be assumed to be filled with liquid and this volume will be added to the total liquid in the container being characterized using VE? The container being characterized using VE would then be rejected and/or repackaged to exclude the internal container if it is over the TSDF-WAC limits. (Section C-3c)	CCP-TP-500, Att.1 and Table 1	Y	BDRs RHSNLVE100001 RHSNLVE110001 RHSNLVE110002 RHSNLVE110003 RHSNLVE110004 RHSNLVE110006 SNLRHVE11007 SNLRHVE11008 SNLRHVE11009 SNLRHVE11010 **(VE-1)**	Y	
314	Are process procedures in place to meet the following Quality Assurance Objectives? <u>Precision</u> • Precision is maintained by reconciling any discrepancies between the operator and the independent technical reviewer with regard to identification of waste matrix code, liquids in excess of TSDF-WAC limits, and compressed gases.	Bullet 1 CCP-TP-500, Att. 1 and 2	Y	BDRs RHSNLVE100001 RHSNLVE110001 RHSNLVE110002 RHSNLVE110003 RHSNLVE110004 RHSNLVE110006 SNLRHVE11007 SNLRHVE11008 SNLRHVE11009 SNLRHVE11010	Y	

	WAP Requirement[1] *SNL/CCP* Audit *A-12-15* Table C6-6 Visual Examination (VE) Checklist	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	
	Accuracy • Accuracy is maintained by requiring operators to pass a comprehensive examination and demonstrate satisfactory performance in the presence of the VE expert during their initial qualification and subsequent requalification. Completeness • A validated VE data form will be obtained for 100 percent of the waste containers subject to VE. Comparability • The comparability of VE data from different operators shall be enhanced by using standardized VE procedures and operator qualifications. (Section C3-4b)	Bullet 2 CCP-QP-002, S. 4.3.8 Bullet 3 CCP-TP-500, Att. 1 Bullet 4 CCP-QP-002, (ALL) CCP-TP-500, (ALL)		**(VE-1)** Bullet 1, ~~3~~ 2 and 4 Qualification cards and training files **(VE-2)**		

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.