

Allen, Pam, NMENV



**From:** Maestas, Ricardo, NMENV  
**Sent:** Monday, December 02, 2013 9:34 AM  
**To:** Allen, Pam, NMENV  
**Subject:** FW: SRS Recertification Audit Memo  
**Attachments:** SRS Recertification Audit Memo Nov 2013 Revision 4.docx

Email and Attachment for WIPP file

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**From:** [Conniewalk@aol.com](mailto:Conniewalk@aol.com) [<mailto:Conniewalk@aol.com>]  
**Sent:** Wednesday, November 27, 2013 1:46 PM  
**To:** Kliphuis, Trais, NMENV; Maestas, Ricardo, NMENV; Smith, Coleman, NMENV; Holmes, Steve, NMENV  
**Cc:** [conniewalk@aol.com](mailto:conniewalk@aol.com); [krw@trininc.com](mailto:krw@trininc.com)  
**Subject:** SRS Recertification Audit Memo

Hello

Attached please find the SRS Recertification Audit memo. I will send the freeze file for the RH600 document in a separate email, although you also have it on disks provided to Cole at the audit. Also, all Attachment 4's were included on the disks as well (these are required to "decode" the C, P, DR, D, and U references cited in the report).

Have a great turkey day!  
Connie

SCANNED



## MEMORANDUM

**TO:** Trais Kliphuis, Ricardo Maestas, Steve Holmes, Coleman Smith  
New Mexico Environmental Department, Hazardous Waste Bureau

**FROM:** Connie Walker

**DATE:** November 27, 2013

**SUBJECT:** Summary of NMED AK Observation of CCP Savannah River Site Remote Handled (RH) and Contact Handled (CH) Recertification Audit A-14-4

On November 12-15, 2013 the New Mexico Environment Department (NMED) observed the Acceptable Knowledge (AK) and Non-Destructive Examination (NDE) portions of DOE CBFO RH and CH Recertification Audit A-14-4 of the Savannah River Site (SRS). The audit addressed both RH and CH wastes. The scope of the audit was to evaluate the adequacy, implementation, and effectiveness of technical and related QA processes for S3000, S4000 and S5000 CH waste streams and S5000 SRS-generated RH waste streams. The audit was performed at the Savannah River Site near Aiken, South Carolina and at the Skeen-Whitlock Building, Carlsbad, New Mexico. The CTAC Audit Team Leader was Ms. Prissy Martinez. This memorandum documents observations of the Acceptable Knowledge portion of the audits. The RH and CH audits were conducted simultaneously.

### **Acceptable Knowledge**

The AK technical specialist was Mr. Dick Blauvelt and QA auditor was Ms. Katie Martin. CCP-SRS representatives Ms. Irene Quintana (SPM), Mr. Kevin Peters (AKE), Ms. Lisa Watson (AKE), and Mr. Jeff Harrison (AKE) were interviewed. These individuals provided documents and information as requested by the audit team. The NMED observer was Connie Walker (NMED support contractor, Trinity Engineering Associates). The documents presented in Attachment A were among those provided in hard copy and electronically to the audit team, including the NMED observers during the course of the audit.

**The following BDRS and traceability data were among those provided for review:**

<b>Drum Number</b>	<b>HSG or Solids BDR</b>	<b>RTR or VE BDR</b>	<b>Travelers, 29-90s, or other traceability forms</b>
MLD0506566 CH Mound Soil	N/A	SR4RTR0301	29-90 form and attachments
MLD0506692 CH Mound Soil	ALD1126M, N, S, V; SRLBC0211; SSC11-00008	SR4RTR0107	29-90 form and attachments
SDD076309 RH sealed sources	N/A	SRSRHVE13001	IDC Screen Shot* 29-90 form and attachments
SR108180 CH HET B debris	SRSHSG1211, SRLBC0706	SRSTR0573	Solid Waste Description traveler (1979)**; DR005
SR607486	ECL13001M, SRHSG1301	SRLBR0069	Solid Waste Description

CH HET B debris			traveler (1995)
SR500174 CH Bldg. 321 Homogenous waste	ALD120030F,H,M,N,S,V; SRLBC0587; SSG12-00007	SR4RTR0230	Solid Waste Description traveler (1975)
SRS26264 RH Bldg.321 Debris	N/A	SR\$RTR0220	IDC Screen Shot*

\*IDC Screen Shots provided for two example drums only

\*\* describes as soil/gravel, RTR shows drum to contain debris and DR005 was prepared to address this discrepancy

### **Summary:**

The CBFO Audit A-14-04 was performed in a professional manner. The scope of the CH audit included the S3000(solids), S4000 (soil) and S5000(debris) Summary Category Groups, represented by Waste Streams CH Homogenous waste- Waste Stream SR-W027-321M-HOM; CH Heterogeneous Debris- Waste Stream SR-SWMF-HET-B; and Mound Soil- Waste Stream SR-MD-SOIL. The scope of the RH audit included RH S5000 debris, represented by Waste Streams RH Sealed Sources- Waste Stream SR-RH-SDD.01 and RH Building 221 Debris-Waste Stream SR-RH-221H.01. These waste streams are described in several documents including waste stream-specific AK Summaries (CCP-AK-SRS-630, Revision 1; CCP-AK-SRS-600, Revision 1; CCP-AK-SRS-14, Revision 3; CCP-AK-SRS-12, Revision 7; CCP-AK-SRS-8, Revision 8). References provided for review are presented in Attachment A.

Document CCP-AK-SRS-600, RH Building 221 Debris, was of much lower quality than the other AK Summaries, and this difference warrants explanation. EPA has a Tier 1 process whereby individual RH waste streams are approved from an NDA, NDE and AK perspective. This process is streamlined if an SRS RH waste stream has a “companion” CH stream; in that case, EPA typically does not perform rigorous review of the RH AK Summary Report (AKSR) assuming that it mirrors the CH AK Summary Report and that CHAK Summary Report has already been through EPA’s CH approval program. Therefore, CCP elected to directly copy as much information as possible from the CH AK Summary to the SRS-600 RH AK Summary, so there would be no question as to whether the RH stream is the “same” as the CH stream (save for the external dose rate). Unfortunately, some of the CH streams have extremely old AKSRs that were developed early in the AK process, so the AKSR information transferred from a CH to RH AK Summary may not be of the format or content typical of current AKSRs. CCP-AK-SRS 600 was just such a document—this AK Summary Report “embedded” discrepancy resolution in the AK hazardous waste discussion, making this discussion extremely difficult to follow (now, these discussions are detailed in source documents, streamlining the AK Summary’s hazardous waste discussions). The document was reviewed for general inconsistencies and errors, but the CTAC auditor and NMED observer – understanding the genesis of the document—did not require extensive re-write of the document to clarify the hazardous waste discussion.

Referencing in the RH AK Summary Reports was lacking, and was questioned during the audit. For example, Reports CCP-AK-SRS-600 and 630 document the presence of stainless steel in waste, and indicate that a study was performed that showed chromium in the steel would typically not leach in excess of Toxicity Characteristic limits, thus supporting exclusion of the Hazardous Waste D007. However, neither document cited a reference that included the analytical results. In fact, CCP-CCP-AK-SRS-630 only referenced the LANL sealed sources AK Summary Report as a source for most information. The intent of the AK approach is to not use

only a single reference as a source of information for hazardous waste and other information; the Permittees are to provide additional review and analysis of information to ensure that the materials are complete and accurate, and present well supported hazardous waste determinations and other information. This omission was discussed with CCP and while no recommendation was made by the CTAC auditor, CCP agreed to look at the CCP-AK-SRS-630 AK Summary and add more thorough referencing. It is recommended that NMED examine CCP-AL-SRS-630 at future audits to verify the addition of more references to the report, required to better support hazardous waste determinations.

Through the course of the audit, the CTAC auditor and NMED observer identified several issues that CCP addressed through modification of the various AK Summaries. Attachment B presents freeze files for CCP-AK-SRS-8 and CCP-AK-SRS-12 prepared to address the issues through forthcoming modifications to these AK Summary Reports; CCP committed to include these changes in the next document revision cycle. CCL-AK-SRS-600 revisions were presented as a red line/strike out of the entire document, and that document is provided to NMED on disk and as a separate emailed document.

Attachment C presents concerns identified by CTAC auditor and/or NMED observer during the course of the audit that Mr. Blauvelt provided to audit team leader, Ms. Prissy Martinez. The following summarizes AK concerns presented in Attachment C and includes other concerns identified by the CTAC auditor/NMED observer during the audit that are not reflected on the concern sheet. Note that other than the concern associated with the CCP-AK-SRS-630, omission of these observations is not crucial at this time because CCP is aware of the issues and will continue to update the AK Summaries through freeze file changes and subsequent document revisions. The additional observations are provided herein for the benefit of NMED at future audits.

#### CCP-AK-SRS-8, Waste Stream SR-MD-SOIL

1. Page 10: Remove “future shipments” discussion. Mound will not be making any more shipments to SRS.
2. Identified by NMED observer/CTAC auditor, but not included in Attachment C: There were apparent discrepancies between Attachment 8 and the AK tracking spreadsheet with regard to low level waste container presentation. The AK tracking spreadsheet is intended to be a current inventory tally while Attachment 8 revision is flexible; CCP is updating Attachment 8 and NMED may wish to review these revisions at the next audit.
3. Identified by NMED observer/CTAC auditor, but not included in Attachment C: CCP agreed that the AK Summary did not reference some of the applicable discrepancy resolutions (DRs, e.g. 3, 6, 7), but did not commit to include these as part of the freeze file changes. NMED may wish to check the AK Summary in the future to verify these revisions.

#### CCP-AK-SRS-12, Waste Stream SR-SWMF-HET-B:

1. Delete “from cleanup and remediation of spills in and around the burial grounds associated with Pad 2” from the waste stream description because this paragraph should

just describe physical form. Move this information to the Executive Summary describing the generating process/activity. The modification makes the document consistent with where the information is presented in other AK Summaries.

2. Prohibited item sections 2.2 and 6.6.4 need to be specific about what we expect in this waste stream, not a general statement about what we have found in other waste streams. Also, the discussion of lead shielding in the prohibited item sections need to be clarified to indicate it is an impenetrable object. This modification is important because AK Summaries must specify the prohibited items expected in the stream to aid RTR operators; simply stating that prohibited items will be removed does not give the operator any “heads up” about what to expect.
3. Section 4.2.2, Page 16, the sentence that begins “The original...” is not a complete sentence. This needs to be corrected.
4. Section 4.6.2: Change ATWIR number SR-W027-643G-HET to SR-SWMF-HET-B. This is required to ensure correct cross correlation with the baseline inventory document.
5. Section 6.4.3.1: Need to cite source documents P048 and P049 which contain the sample results referred to in this paragraph. This is very important to ensure that the AK Summary cites actual analytical data collected to support hazardous waste determinations.
6. Identified by NMED observer/CTAC auditor, but not included in Attachment C: Future volume generation (newly generated waste) was unclear based on information presented in the AK Summary. CCP clarified the intent during the audit, but NMED may wish to examine this AK Summary in the future to see whether future volume generations are presented more clearly.
7. Identified by NMED observer/CTAC auditor, but not included in Attachment C: Waste material parameter estimates presented in Attachment 6 and the AK Summary are not consistent, but the CCP procedure does not require periodic updating to ensure consistency so this wasn’t presented by the CTAC auditor. NMED may wish to examine this AK Summary Report at future audits to determine whether updating occurred and Attachment 6 and the AKSR are consistent. This is important to ensure that the waste stream physical composition is adequately updated for the benefit of NDE operators.

#### CCP-AK-SRS-14, Waste Stream SR-W027-321M-HOM

1. Identified by NMED observer/CTAC auditor, but not included in Attachment C: The AK Summary states that oil was sampled and analyzed, but the source document including the results of the analysis was not identified. Also Page 9 says the oil was placed in cans but page 55 states waste was directly placed in 55 gallon drums, so the document is not consistent. CCP indicated that they would consider clarifying waste disposition in future documents, but did not commit to a freeze file to this end. NMED may wish to examine the AK Summary for edits to see if CCP elects to revise the document for clarity.
2. Identified by NMED observer/CTAC auditor, but not included in Attachment C: Attachment 1 presents DRs that are not on AK Summary reference list. CCP indicated that revision of the Attachments and references lists is an ongoing process, but did not provide an updated Attachment 1 removing the inapplicable references. Also, AK

reference lists and Attachments 1 and 4 should agree, as appropriate. NMED may wish to check these documents for consistency at future audits.

CCP-AK-SRS-600, Waste Stream, SR-RH-221H.01

1. During review of this AK Summary, several items were noted that could be revised for clarify. These items have already been captured in a reline-strikeout revision to the document. Note that the auditor and observer did not examine the redline-strikeout in detail and did not provide extensive editorial suggestions due to the fact that the document was a “companion” RH stream as described above.

CCP-AK-SRS-630, Waste Stream SR-RH-SDD.01

1. Identified by NMED observer, but not included in Attachment C: References in this AKSR include only “upper tier” LANL documents. This approach does not reflect the intent of the permit AK process that requires additional analysis and review beyond a few background documents to verify waste stream determinations, hazardous waste assignments, etc. This was brought to the attention of CCP and they agreed to examine the thoroughness of references cited, but did not commit to better referencing (and, hence better documenting) information in the AK Summary. NMED may wish to examine this AK Summary in the future to determine whether references were added. This concern was discussed with the NMED representative.

## **ATTACHMENT A REFERENCES**

*Note: All references available electronically were provided on disk to the NMED representative present at the audit. Most of the documents presented below were available electronically, while others were reviewed in hard copy as no electronic version was provided. Not all references provided electronically may be presented below.*

AK Accuracy Report, CCP-TP-005-REV26 Attachment 14, Waste Stream SR\_RH\_221H.01, November 14, 2013

AK Accuracy Report, CCP-TP-005-REV26 Attachment 14, Waste Stream SR\_RH\_221H.01, October 10, 2013

AK Accuracy Report, CCP-TP-005-REV26 Attachment 14, Waste Stream SR\_RH\_SDD.01, October 3, 2013

AK Characterization Checklists for Waste Stream SR-MD-Soil, Lots 1-9, January, 2011-September, 2013

AK Re-Evaluation Checklists, CCP-AK-SRS-008, Waste Stream SR-MD-Soil, February 21, 2013 and October 31, 2012

AK Tracking Spreadsheets, RH and CH waste, provided November 14, 2013

CCP-AK-SRS-8, Central Characterization Program Acceptable Knowledge Summary Report For Mound Site Transuranic Waste Stored at Savannah River Site, Waste Streams: SR-MD-HET SR-MD-SOIL, SR-MD-HOM-A, SR-MD-HOM-C, Revision 8, October 10, 2012

CCP-AK-SRS-12, Central Characterization Program Acceptable Knowledge Summary Report For Savannah River Site Solid Waste Management Facility, Waste Streams: SR-SWMF-HET-A, SR-SWMF-HET-B, Revision 7 and April 16, 2013

CCP-AK-SRS-14, Central Characterization Program Acceptable Knowledge Summary Report For Savannah River Site Fuel Fabrication Facility Transuranic Waste Streams: SR-W027-321-322M-HET, SR-W027-321M-HOM, Revision 3, May 22, 2013

CCP-AK-SRS-600, Central Characterization Program, Acceptable Knowledge Summary Report, For Savannah River Site Remote-Handled Transuranic Waste, Waste Streams: SR-RH-221H.01, SR-RH-221H.02, Revision 1, November 27, 2012

CCP-AK-SRS-630, Central Characterization Program Acceptable Knowledge Summary Report For Savannah River Site Physics Laboratory Sealed Sources, Waste Stream: SR-RH-SDD.01 Revision 1, September 26, 2013

CCP-TP-005 Attachments 1, 4, 5, 6, 7 and 8, SRS-AK-12, SR-SWMF-HET-B , March 2013-October, 2013

CCP-TP-005 Attachments 1, 4, 5, 6, 7 and 8, CCP-AK-SRS-008, provided November 2, 2013

CCP-TP-005 Attachments 1, 4, 5, 6, 7, and 8, Waste Stream CCP-SRS-AK-14, SR-W027-SR321 HOM, provided November 2, 2011

CCP-TP-005 Attachments 1, 4, 5, 6, 8, 15, Waste stream SRRH-221H.01, (CCP-AK-SRS600), June 2011- October 2013

CCP TP-005, Attachments 1, 4, 5, 6, 8, and 15, SRS AK-630, SR-RH-SDD.01, June, 2013-October, 2013

CCP-TP-005, Attachment 10, SRS-AK12-SR-SWMF-HET-B, June 10, 2013

CCP-TP-005, Attachment 10, SRS-AK12-SR-SWMF-HET-B, August 13, 2013

CCP-TP-005 Attachment 10, AK Reevaluations, SRS AK 12, SWMF-HET B, June 10, 2013 and August 13, 2013

CCP-TP-005, Attachment 10 -Acceptable Knowledge Re-evaluation Checklists, Site(s): Savannah River Site (SRS-12) Waste Stream Number(s): SR-SWMF-HET-B Waste Stream, undated.

CCP-TP-005, Attachment 10 -Acceptable Knowledge Re-evaluation Checklist, Waste Stream SR-W027-321M-HOM (CCP-AK-SRS-14), 4/4/13

CCP-TP-005 Attachment 13, Waste Stream Characterization Checklist waste stream SR-W027-321M-HOM, April 15, 2013

CCP-TP-005 Attachment 13 AK Characterization Checklist SRS-AK-12, Waste Stream SR-SWMF-HET-B, October 18, 2013

Characterization Information Summary, Lot Evaluation Forms combined Lot 1 AK-600, October 10, 2013

Characterization Information Summary, Lot Evaluation Forms combined Lot 1, AK-630, October 10, 2013

Characterization Reconciliation Report, CRR-SR-RH-221H.01-0001, October 10, 2013

Characterization Reconciliation Report CRR-SR-RH-SDD.01-0001, October 7, 2013

Headspace Gas Random Selection Memos, Lot 1, SRS\_AK12\_SR-SWMF-HET-B, April 2, 2012 and November 27, 2012

Inter-Office Correspondence, J.E. Hoff to Distribution, Transmittal and Closure of NWP Quality Assurance Audit I13-06, Central Characterization Program Quality Assurance Program, October 17, 2013

Non Conformance Reports NCR-SRS-0259-13, NCR-SRS-0260-13, NCR-SRS-0262-13, NCR-SRS-0265-13\_R1, NCR-SRS-0281-13, NCR-SRS-0282-13, NCR-SRS-0954-12\_R1, NCR-SRS-1091-12\_R2, NCR-SRS-1462-12\_R, NCR-SRS-1724-12, NCR-SRS-1726-12, NCR-SRS-1728-12, NCR-SRS-1731-12, NCR-SRS-1732-12, NCR-SRS-1733-12 NCR-SRS-1986-12\_R1, dated November 2012 through August 2013

Revised Headspace Gas Random Sample Selection Memorandum For Waste Stream Sr-Rh-221h.OI, Lot 1, Characterized By The Central Characterization Project At The Savannah River Site, November 6, 2012

Sealed Sources Peer Review Report, A Peer Review Conducted by Hugh Evans, Joe Harvill, Thomas Sowdon, and James Booth, for the Off-Site Source Recovery Project, Los Alamos National Laboratory, Los Alamos, New Mexico, December 5, 2003

Solid Sampling Summary Report, Waste Stream S7-321M-HOM, August 9, 2013

Solid Sampling Random Selection Sampling Memos, SRS\_AK8\_SR-MD-SOIL, Lots 01 and 02, November 23, 2009 and November 14, 2011

Solid Sampling Summary Reports, SRS MD Soil, Lots 1 and 2, May 19, 2011 and November 16, 2011

U. S. Department of Energy Carlsbad Field Office Management Procedure CBFO MP 10.5, Rev. 8, Effective: February 16, 2010, Subject: Peer Review, February 10, 2010

Waste Stream Characterization Checklist, CCP-TP-005-REV26\_Attachment 13 Lot 1 SR-RD-SDD, October 3, 2013

Waste Stream Characterization Checklist, CCP-TP-005-REV26\_Attachment 13 Lot 1 SRS-600, October 10, 2013

Waste Stream Profile Form, SR-MD-SOIL, December 6, 2012

Waste Stream Profile Form, SR-RH-221H.01, November 27, 2012

Waste Stream Profile Form, SR-RH-SDD.01, September 26, 2013

Waste Stream Profile form, SR-SWFM-FET-B, August 2, 2013

Waste Stream Profile Form, Waste Stream SR-W027-321 M-HOM, April 2, 2013

### Waste Stream Specific References

**CCP-AK-SRS- 8:** C009, C016, C019, C046, DR001, DR002, DR003, DR004, DR005, DR006, DR007, DR008, DR009, DR010, DR011, DR012, DR013, DR014, DR015, DR016, DR017, DR018, DR019, DR020, DR0221, DR022, I005, I008, I011, I042, I081, I082, I086, I090, I092, M001, M003, M004, M012, M016, M025, M042, M043, M055, M061, M062, M063, M065, M076, M077(Att3 only), M0778(Att3 only), M079(Att3 only), P013, P015, P016, P017, P020 (Att3 only) P021, P023, P028, P036, P037, P040, P041, P045, P048, P050, P053 (Att3 only), P054, P055, P056, P061, P070, P072 (Att3 only), P073, P081, P096, P097, P100, P109, P115, U002, U003

**CCP-AK-SRS-12:** C001, C002, C008, C009, C054, C056, C057, C058, C059, C061 (Att3 only), C064, C065, C066, C069, C070,C)76 (Att3 only), C077 (Att3 only), C078, C083 (Att3 only), D001, D002, D003, D004, D005, D018, D019, DR001, DR002, DR003, DR004, DR005, DR006, DR007, M013 Att3, M014, M013 (Att3 only), M016, M016\_ADD1, M016\_ADD2, M016\_ADD3. PDF, M016\_ADD4. PDF, M018, M019, M022, M025, M025\_ADD1, M029, P005, P008, P009, P048, P049, P050,

**CCP-AK-SRS-AK 14:** C016, C017, C019, C027, C028, C033, C036, C037, C038, C039, C043, C044, C045, C052, C055, C062, C065, C066, C100, C067, C104, C105, C150, C151, C152, D002, D007, D008, D010, D044, DR001, DR002, DR003, DR004, DR005, DR006, DR007, DR008, DR009, DR010, DR011, DR012, DR013, DR014, DR015, DR017, DR1003, DR4020, DR4021, DR6001, DR6002, M023, M023\_ADD1, M024, M050, M050\_ADD1, P036, P043, P067, P155, P155-Att3, P158, P160, P162\_ADD1, P162\_ADD2, P163, P163\_ADD1, P163\_ADD2, P166

**CCP-AK-SRS-600:** C006, C014, C031, C032 (Att3 only), C044, C050, C057, C067, C071, C075, C083, C088, C091, C093, C098, C105, C116, C132, C134, C135, C139, C146, C152, C155, C156, C165, C197(Att3 only), D004, D005A, D006, D010, D011, D016, D018, D019, D020, D026, D027, D041, D044, D059, D067, D075, D092, D107, D108, D109, D110, D111, D113, D114, D120, DR001, DR002, DR003, DR004, DR005, DR006, DR007, DR008, DR009, DR010, DR011, DR012, DR013, DR014, DR015, DR016, M009, M012, M015, M026, M037, M040, M051, M073, M082, M094, M095, M096, M115, M169, P015, P026, P034, P048, P049, P052, P061, P062, P073, P081, P090, P091, P106, P119

**CCP-AK-SRS- 630:** C001 (Att3 only), C002 (Att3 and source document), C009, C016, C019, I005, I008, I090, I092, M004, P001 (Att3 only), P002 (Att3 only), P003 (Att3 only), P096, P100, U001 (Att3 only), U002 (Att3 only), U003, U004 (Att3 only), LANL D002, LANL D003, LANL D007

**The latest version of the complete reference lists for each Waste Stream, CCP-TP-005 Attachment 4, is provided with this memorandum as separate documents.**

## **ATTACHMENT B FREEZE FILES**

### **Freeze File for CCP-AK-SRS-8, 11/14/2013**

1. Page 10: Remove "future shipments" discussion. Mound will not be making any more shipments to SRS.

### **Freeze File for CCP-AK-SRS-12, 11/14/2013**

1. Section 2.2: Delete "from cleanup and remediation of spills in and around the burial grounds associated with Pad 2." from the waste stream description because this paragraph should just describe physical form. Move this information to the Executive Summary describing the generating process/activity.
2. Prohibited item sections 2.2 and 6.4.4 need to be specific about what we expect in this waste stream, not a general statement about what we have found in other waste streams. Also, the discussion of lead shielding in the prohibited item sections needs to be clarified to indicate it is an impenetrable object.
3. Section 4.2.2, Page 16: The sentence that begins "The original..." is not a complete sentence. This needs to be corrected.
4. Section 4.6.2: Change ATWIR number SR-W027-643G-HET to SR-SWMF-HET-B.
5. Section 6.4.3.1: Need to cite source documents P048 and P049 which contain the sample results referred to in this paragraph

**The freeze file for CCP-AK-SRS-600 was provided as a redline/strikeout of the entire document and is included on disks provided to the NMED representative.**

**ATTACHMENT C**  
**AUDIT ISSUES AND CONCERNS**

**AUDIT A-14-04**  
**AMWTP Recertification Audit**  
**Date: 11/15/13**

No.	Who	Description of Concern	Requirements Comments
1	B. Pace	The Special Form Capsule Traveler Sheet forms in BDR SRSRHVE13001 lacks a control number for traceability to the governing procedure and for determining the status/revision of the forms.	<p>WP 13-1, QAPD, Rev. 34, Section 1.4.3.D; "Controls shall be established and maintained to identify the current status/revision of controlled documents and forms."</p> <p>WP 13-1, QAPD, Rev. 34, Section 2.1; "...Work shall be performed under controlled conditions using approved instructions, procedures, drawings, or other appropriate means."</p>
2	B. Pace	<p>CCP-AK-SRS-630, AK Summary Report indicates that the Waste Matrix Code assigned to waste stream SR-RH-SDD.01 (Plutonium-beryllium neutron sources) is S5400. However, the VE operators assigned S5111 as the waste matrix code when BDR #SRSRHVE13001 was completed.</p> <p>This concern was abated after additional evidence was presented. Revision 0 of CCP-AK-SRS-630, which was in affect at the time VE was performed reflected the assignment of Waste Matrix Code S5111, which is consistent with the assignment of S5111 by the VE operators during the examination.</p>	<p>CCP-TP-500, Rev 13, Step 4.1.2 [B]; "...record the following..." [B.3] Waste Matrix Code as identified from AK"</p> <p>CCP-TP-500, Rev 13, Step 2.4.2; "If a condition adverse to quality is identified, the individuals identifying the condition SHALL initiate a nonconformance report (NCR) in accordance with CCP-QP-005, CCP TRU Nonconforming Item Reporting and Control."</p>

The information contained on this form is preliminary. All results and concerns are subject to final review and classification by CBFO QA.

**AUDIT A-14-04**  
**AMWTP Recertification Audit**  
**Date: 11/15/13**

No.	Who	Description of Concern	Requirements Comments
3	D. Blauvelt	<p>It is recommended that the following changes be made to the respective AK Summaries for clarification.</p> <p>CCP-AK-SRS-12, Waste stream SR-SWMF-HET-B</p> <ol style="list-style-type: none"> <li>1. Section 2.2: Delete "from cleanup and remediation of spills in and around the burial grounds associated with Pad 2." from the waste stream description because this paragraph should just describe physical form. Move this information to the Executive Summary describing the generating process/activity.</li> <li>2. Prohibited item sections 2.2 and 6.4.4 need to be specific about what we expect in this waste stream, not a general statement about what we have found in other waste streams. Also, the discussion of lead shielding in the prohibited item sections needs to be clarified to indicate it is an impenetrable object.</li> <li>3. Section 4.2.2, Page 16: The sentence that begins "The original..." is not a complete sentence. This needs to be corrected.</li> <li>4. Section 4.6.2: Change ATWIR number SR-W027-643G-HET to SR-SWMF-HET-B.</li> <li>5. Section 6.4.3.1: Need to cite source documents P048 and P049 which contain the sample results referred to in this paragraph.</li> </ol> <p>CCP-AK-SRS-8, Waste stream SR-MD-SOIL</p> <ol style="list-style-type: none"> <li>6. Page 10: Remove "future shipments" discussion. Mound will not be making any more shipments to SRS.</li> </ol> <p>CCP-AK-SRS-600 Waste Stream SR-RH-221H.01</p> <p>During a review of this AK Summary, several items were noted that could be revised for clarity. These items have already been captured in a redline strikeout revision to this document.</p>	Recommendation
4	K. Martin	CCP-AK-SRS-14, Rev. 3, Central Characterization Program Acceptable Knowledge Summary Report for Savannah River Site Fuel Fabrication Facility Transuranic Waste, was issued with a missing figure (Figure 2) that was intended to be in the document.	CCP-QP-010, Rev. 23, Section 2.2.2 states, "Documents are reviewed for adequacy, correctness, and completeness prior to approval and issuance."

The information contained on this form is preliminary. All results and concerns are subject to final review and classification by CBFO QA.

**AUDIT A-14-04**  
**AMWTP Recertification Audit**  
**Date: 11/15/13**

No.	Who	Description of Concern	Requirements Comments
5	K. Kirkes	A container (#SR518667H) in RTR batch report SR4RTR0356 had an NCR written because the waste form did not match the Waste Stream description and/or the Waste Matrix Code. The disposition of the NCR was to use as is because the Waste Matrix Code is assigned based on analysis that was performed to determine the average organic and inorganic volume of the waste in the entire waste stream. It is expected that individual containers may fall outside the organic/inorganic volumes specified. Batch Report SR4RTR0356 SPM checklist question #9 states that the physical form of one container (#SR518667H) does not match the Waste Matrix Code even though the container was identified as meeting the QAOs. A recommendation was made to CCP that there should be some additional information added in the comments section on question 9 of the SPM checklist to clarify that the container is acceptable for the waste stream.	Recommendation
6	Pace	Evidence could not be provided to confirm the appointment of a Visual Examination Expert during the time-frame in which VE was performed on the plutonium-beryllium sources in BDR #SRSRHVE13001.	CCP-PO-001, Section C1-2; The SPM designates VE experts. Designated VE experts are familiar with the waste-generating processes that have taken place at the site and waste types for wastes being characterized at a particular site. VE experts are responsible for the overall direction and implementation of VE activities for the CCP at that site. VE experts meet the qualification and training requirements specified in CCP-QP-002 and make decisions based on training, previous experience, and knowledge of the waste stream.
7	Schuetz	Procedure steps adequately describe up-date of the Integrated Data Center (IDC) with tracking information regarding to container identification related to an NCR. This data entry / up-date is currently being validated to endure correctness. Procedure steps do not include the data validation process with the directions for up-date of the IDC. The audit team <u>recommends</u> that the data validation be included in procedure steps that cover up-date of the IDC.	

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