



SUSANA MARTINEZ
Governor

JOHN A. SANCHEZ
Lieutenant Governor

**NEW MEXICO
ENVIRONMENT DEPARTMENT**

Hazardous Waste Bureau

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



RYAN FLYNN
Cabinet Secretary Designate

BUTCH TONGATE
Deputy Secretary

TOM BLAINE, P.E.
Director

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

January 6, 2014

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

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

**RE: NMED APPROVAL OF THE IDAHO NATIONAL LABORATORY/CENTRAL
CHARACTERIZATION PROJECT FINAL AUDIT REPORT, AUDIT A-13-18
WASTE ISOLATION PILOT PLANT
EPA I.D. NUMBER NM4890139088**

Dear Messrs. Franco and Sharif:

On November 20, 2013, the New Mexico Environment Department (NMED) received the Final Audit Report of the Idaho National Laboratory/Central Characterization Project (INL/CCP) Audit Number A-13-18 (**Audit Report**), from the Department of Energy's Carlsbad Field Office (CBFO). CBFO and Nuclear Waste Partnership LLC (**the Permittees**) were required to submit this Audit Report under the Waste Isolation Pilot Plant (WIPP) Hazardous Waste Facility Permit as specified in Permit Section 2.3.2.3. The intended scope of this recertification audit was to ensure the continued adequacy, implementation, and effectiveness of the INL/CCP waste characterization for contact-handled (CH) Summary Category Groups (SCGs) S3000 homogeneous solids, S4000 soils/gravel, and S5000 debris, and remote-handled (RH) SCGs S3000 homogeneous solids and S5000 debris wastes relative to the requirements of the WIPP Permit.

140101



The Audit Report consisted of the following items:

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

NMED Representatives observed the audit on June 3-6, 2013. NMED has examined the Audit Report for evidence of compliance with the requirements of Permit Sections 2.3.2 (Audit and Surveillance Program) and 2.3.1 (Waste Analysis Plan [WAP]).

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

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

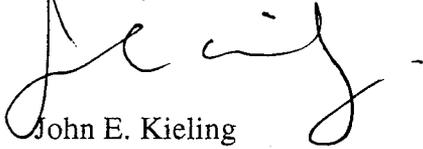
NMED concludes that this Audit Report demonstrates that INL/CCP has implemented the applicable characterization requirements of the WAP. Therefore, NMED approves the Permittees' Recertification Audit Report for INL/CCP Audit A-13-18 and amends the previous Audit Report approval, A-12-13 issued by NMED on March 11, 2013 to include only those waste forms and processes evaluated by this recertification audit.

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

Messrs. Franco and Sharif
January 6, 2014
Page 3

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

Sincerely,

A handwritten signature in black ink, appearing to read "John E. Kieling". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

John E. Kieling
Chief
Hazardous Waste Bureau

JEK: tlk

cc: Tom Blaine, Director, NMED EHD
Trais Kliphuis, NMED HWB
Steve Holmes, NMED HWB
Ricardo Maestas, NMED HWB
Coleman Smith, NMED HWB
Susan Lucas-Kamat, NMED DOEOB
Curt Fransen, IDEQ Oversight
Laurie King, EPA Region 6
Tom Peake, EPA ORIA
Connie Walker, Trinity Engineering
File: Red WIPP '14

NMED COMMENTS ON THE
IDAHO NATIONAL LABORATORY/CENTRALIZED CHARACTERIZATION
PROJECT (INL/CCP) FINAL AUDIT REPORT A-13-18

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

The C6 Checklist Version Dated May 8, 2012

1. Questions 9 and 149 of the C6 Checklist indicate that the procedure given, CCP-TP-068, answers the question. This procedure was not included in the Audit Report in hardcopy or electronically.
2. Questions 68 and 69 of the C6 Checklist indicate that the procedure given, CCP-PO-002, answers the question. The procedure was not in the Audit Report in hardcopy or electronically.
3. Question 80 of the C6 Checklist does not have the Permit citation listed with the question. The citation should be (Section C2-1a).

The C6 Version Dated March 13, 2013

1. The response to Question 9 and 149 of the C6 Checklist was "Refer to C6-1, May 8, 2012" checklist. The procedure given in the previous checklist, CCP-TP-068 was not included in the Audit Report in hardcopy or electronically.
2. The response to Questions 68 and 69 of the C6 Checklist was "Refer to C6-1, May 8, 2012" checklist. The procedure given in the previous checklist, CCP-PO-002, was not included in the Audit report in hardcopy or electronically.
3. Question 237 of the C6 Checklist indicates that the procedural citation given, CCP-TP-005, Section 4.5.3 [A] answers the question. CCP-TP-005, Section 4.5.3 [A] refers to Head Space Gas Analytical Data. The correct citation should be CP-TP-005, Section 4.5.3 [C], which refers to Radiography and VE Data.