



**Allen, Pam, NMENV**

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**From:** Maestas, Ricardo, NMENV  
**Sent:** Friday, January 31, 2014 2:31 PM  
**To:** Allen, Pam, NMENV  
**Subject:** FW: Scope of EPA's Upcoming Continued Compliance Inspection at ORNL for CH and RH Waste  
**Attachments:** ORNL CC Scope Jan 15 2014.pdf

Pam,  
Please include the attachment in the WIPP file.  
You can put this down as received on Jan. 15, 2014

Thank you!

**RECEIVED**

**JAN 15 2014**

**NMED  
Hazardous Waste Bureau**

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**From:** Kliphuis, Trais, NMENV  
**Sent:** Thursday, January 16, 2014 1:29 PM  
**To:** Maestas, Ricardo, NMENV  
**Cc:** [robert.bishop@tn.gov](mailto:robert.bishop@tn.gov)  
**Subject:** FW: Scope of EPA's Upcoming Continued Compliance Inspection at ORNL for CH and RH Waste

Ricardo,

Please add 'robert.bishop@tn.gov' to the ORNL audit email list. Thanks.

Trais Kliphuis  
WIPP Staff Manager  
Hazardous Waste Bureau  
New Mexico Environment Department  
2905 Rodeo Park Drive E, Building 1  
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Front Desk: 505-476-6000

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**From:** Kliphuis, Trais, NMENV  
**Sent:** Wednesday, January 15, 2014 6:07 PM  
**To:** 'robert.bishop@tn.gov'  
**Subject:** FW: Scope of EPA's Upcoming Continued Compliance Inspection at ORNL for CH and RH Waste

As promised.

Trais Kliphuis  
WIPP Staff Manager  
Hazardous Waste Bureau  
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**From:** Feltcorn, Ed [<mailto:Feltcorn.Ed@epa.gov>]

**Sent:** Wednesday, January 15, 2014 12:33 PM

**To:** Site Documents - DOE; Morgan, Thomas - DOE

**Cc:** Stroble, J. R. - DOE; Marcus Pinzel; [pkelly@scainc.com](mailto:pkelly@scainc.com); [kdarlow@scainc.com](mailto:kdarlow@scainc.com); Joglekar, Rajani; Peake, Tom; Harris, Alton; Bender, Lindsey; Generette, Lloyd; Kliphuis, Trais, NMENV; Gulbransen, Ed -- NWP; Joo, Irene - NWP

**Subject:** Scope of EPA's Upcoming Continued Compliance Inspection at ORNL for CH and RH Waste

Here is the scope for the inspection. Note the conference call date on page 3 and the additional document requests. Let us know if you have any questions.

Ed Feltcorn

**Scope of EPA's Continued Compliance Inspection of the Oak Ridge National Laboratory  
Characterization Program for Contact-Handled Transuranic Waste**

**DOE Site:** Oak Ridge National Laboratory (ORNL)

**Organizations Notified:** Department of Energy – Carlsbad Field Office  
New Mexico Environment Department

**Evaluation Dates:** February 4–6, 2014

<b>Evaluation Schedule:</b>	Tuesday 8:00 am	Kick-Off Meeting*
	Tuesday 8:30 am – 4:00 pm	Conduct Inspection
	Wednesday 8:00 am – 4:00 pm	Conduct Inspection
	Thursday 8:00 am – 1:00 pm	Conduct Inspection
	Thursday 2:00 pm	Close-Out Meeting*

\* With CBFO National TRU Program staff, and ORNL-CCP technical leads and management

**EPA Evaluation Team:** Mr. Ed Feltcorn, EPA Lead Inspector  
Ms. Rajani Joglekar, EPA Inspector  
Mr. Patrick Kelly, EPA Support Contractor (SC&A)  
Ms. Kira Darlow, EPA Support Contractor (SC&A)  
Ms. Connie Walker, EPA Support Contractor (SC&A)  
Ms. Dorothy Gill, EPA Support Contractor (SC&A)

**Evaluation Scope:**

EPA will conduct a continued compliance inspection of the Central Characterization Program's (CCP's) waste characterization activities at ORNL, focusing on acceptable knowledge (AK), nondestructive assay (NDA), radiological characterization using dose-to-curie (DTC) and Real-Time Radiography/Visual Examination (RTR/VE) of contact-handled (CH) and remote-handled (RH) wastes from all applicable summary category groups (SCGs). In addition, the EPA team will evaluate proposed Tier 1 (CH) changes to add SCG S3000 (solids) waste and physical changes to the IQ3 NDA system. EPA will conduct this inspection in accordance with 40 CFR 194.8(b) to evaluate the adequacy, implementation, and effectiveness of the technical processes implemented by ORNL-CCP for characterizing CH and RH transuranic (TRU) waste. The technical areas of the scope and the required documents are detailed below.

**Acceptable Knowledge, CH and RH, Documentation Requested as Soon as Possible:**

EPA understands that the following waste streams are ready for EPA inspection:

- OR-NFS-CH-Soil
- OR-NFS-CH-HOM-A
- OR-ISTP-CH-HET
- OR-REDC-RH-HET

ORNL-CCP should confirm that these are the waste streams of interest at this time or provide the names of the correct wastes streams. Each of the items listed below is requested for each waste streams identified above.

- AK summary report (AKSR).
- All completed CCP-TP-005 attachments, including characterization checklists and associated memoranda.
- Waste stream profile form and change notices. Draft version is acceptable where necessary.
- Characterization Information Summary (CIS), Characterization Reconciliation Report (for Waste Stream OR-REDC-RH-HET only), and Summation of Aspects. Draft version is acceptable where necessary.
- Certification Plan (for Waste Stream OR-REDC-RH-HET only).
- Associated nonconformance reports (NCRs) and discrepancy resolutions.
- AK accuracy reports. Draft version is acceptable where necessary.
- List of fully characterized containers and AK tracking spreadsheet.
- All add container memoranda, if not already provided with the CCP-TP-005 attachments or source documents.
- Source documents listed in the AKSR and associated CCP-TP-005, Attachment 3, source document summaries.
- Training records for all ORNL-CCP AK Experts and Site Project Managers.

**Nondestructive Assay, CH, and Radiological Characterization, RH, Documentation Requested as Soon as Possible:**

- Listing of all operating NDA and DTC systems and the status of each.
- Calibration documentation for all NDA and DTC systems, including scale(s).
- Certificates for radioactive sources used in NDA and DTC calibration or performance testing.
- Number of calibration verifications or other evidence of instrument performance since resuming waste characterization operations.
- Listing of systems' performance [number of containers assayed, batch data reports (BDRs) complied and promoted] since resuming waste characterization operations.
- Listing of container numbers that are available for EPA replicate analyses.
- Listing of all active NDA and DTC personnel (operators, data validators, independent technical reviewers and expert analysts).
- List of Qualified Individuals (LOQI) for all personnel in previous bullet.

- Listing of current revisions of all calibration, operating, calculation, and data validation procedures.

EPA will select specific containers for replicate analyses for the NDA system based on the information supplied by ORNL-CCP as listed above. EPA will observe all operating NDA and DTC systems while on site at ORNL for this continued compliance inspection.

**Real Time Radiography and Visual Examination, CH and RH, Initial Documentation Requested as Soon as Possible:**

- A list of the most recent RTR BDRs for all applicable CH and RH SCGs.
- A list of the most recent VE BDRs for all applicable CH and RH SCGs.

Several BDRs will be selected from the lists provided by ORNL-CCP as listed above. Copies of the selected, written BDRs are required for review prior to the onsite visit. EPA will observe VE and RTR operations for waste from multiple SCGs, if possible, and review the documents below prior to the on site evaluation at ORNL.

- RTR audio/visual (A/V) records.
- LOQIs for the dates encompassed by the selected RTR and VE BDRs.
- Copies of any NCRs for the selected RTR and VE BDRs.
- The last training and test drum examinations for RTR operators identified in the selected RTR BDRs, including container inventory sheets, evaluation sheets and A/V recordings.
- Qualification packages for selected RTR and VE operators (to be identified following BDR review).
- Lists of NCRs generated for RTR and VE since resuming waste characterization activities.

**Pre-Evaluation Conference Call:**

A conference call between EPA, CBFO and ORNL staff will be held on Wednesday, January 29 2014, at 1:00 PM eastern time, to review the scope of EPA's inspection and identify an additional document needs. The telephone number for the call is 1-866-299-3188, and the participant code is 2023439462#.

**Logistics:**

- A pre-evaluation conference/Kick-Off Meeting will be held Tuesday, February 4, 2014 at 8:00 am at a location designated by ORNL.
- A post-evaluation EPA briefing/Close-Out Meeting will be held Thursday, February 6, 2014, at 2:00 pm for this evaluation at a location designated by ORNL.

CBFO QA staff is invited to send observers to this activity.