



RECEIVED

JAN 23 2014

MEMORANDUM

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

**FROM:** Connie Walker

**DATE:** January 21, 2014

**SUBJECT:** Summary of NMED AK Observation of CCP Oak Ridge Certification / Suspension Audit A-14-03

On January 14-16, 2014 the New Mexico Environment Department (NMED) observed the acceptable knowledge (AK) and non-destructive Examination (NDE) portions of DOE CBFO Certification/Reinstatement audit of the Oak Ridge National Laboratory (ORNL). The scope of the audit included CH S4000 and S5000, as well as RH S5000 waste; these waste Summary Category Groups were previously approved for shipment prior to site shut-down. Additionally, S3000 CH waste was evaluated for initial approval. The audit was performed at Oak Ridge National Laboratory and Carlsbad, New Mexico. The AK portion of the Audit was held in Carlsbad. The NMED AK observer, Ms. Connie Walker (Trinity Engineering Associates) attended the AK portion of the audit.

**Acceptable Knowledge**

The AK technical specialist was Mr. Dick Blauvelt and QA auditor was Ms. Katie Martin. CCP-SRS representatives were Mr. Jeff Harrison and Mr. Kevin Peters; Ms. Irene Quintana (SPM RH) also participated. The NMED observer was Ms. 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 observer.

**The following drum BDRs and associated traceability information were provided for review:**

Waste Container (Daughter Drum)	Waste Stream	VE/RTR BDR*	Parent Drum or Container	Traceability Document-Parent Container*	Traceability Document-Daughter Drum*
X10C0501534	OR-ISTP-CH-HET	RTR6-0342	X10C9311139	WTS Form 2109	VE Technique Data Form
X10C0501650	OR-ISTP-CH-HET	RTR6-0353	X10C9312391	WTS Form 2109	VE Technique Data Form
NFS0478A	OR-NFS-CH-HOM-A	RTR6-0437	NFS0478	Form 2822	CH Waste Repackaging Data Form
NFS0929A	OR-NFS-CH-HOM-A	RTR6-0438	NFS0929	Form 2822, T/S/D Record, form TX 5352A	CH Waste Repackaging Data Form
X10C0506151B	OR-NFS-CH-SOIL	RTR7-0002	X10C0506151	WTS Form 2109	CH Waste Repackaging Data Form



Waste Container (Daughter Drum)	Waste Stream	VE/RTR BDR*	Parent Drum or Container	Traceability Document-Parent Container*	Traceability Document-Daughter Drum*
X10C0506151E	OR-NFS-CH-SOIL	RTR7-0003	X10C0506151	WTS Form 2109	CH Waste Repackaging Data Form
NFS0713	OR-NFS-CH-SOIL	RTR7-092	NFS0713-Parent was not repackaged to create daughter drum so daughter=parent drum	Form 2822	Form 2822
ORRH00681	OR-REDC-RH-HET	RHVE13004	X10C900188;overpack of parent cask X10C9402622	Form TX-5753, TX-5749, TRU Waste Cert Data Sheet, WTS Form 2109	CCP Visual Examination Data Form

\*BDRs are not repeated in the reference list. Traceability documents include "M" source documents.

**Summary:**

The CBFO Audit A-14-03 was performed in a professional manner. The AK audit addressed the following waste streams and associate AK Summary Reports, noting that two of the streams are described in one report:

- Waste Stream OR-NFS-CH-Soil (S4000-CH) in CCP-AK-ORNL-00, Central Characterization Program Acceptable Knowledge Summary Report For Nuclear Fuel Services, Contact-Handled Transuranic Waste Stored at Oak Ridge National Laboratory, Waste Streams: OR-NFS-CH-HET-A, OR-NFS-CH-SOIL, OR-NFS-CH-HOM-A, OR-NFS-CH-HOM-B, REVISION 8, December 12, 2013
- Waste Stream OR-NFS-CH-HOM-A (S3000-CH), in CCP-AK-ORNL-00, Central Characterization Program Acceptable Knowledge Summary Report For Nuclear Fuel Services, Contact-Handled Transuranic Waste Stored at Oak Ridge National Laboratory, Waste Streams: OR-NFS-CH-HET-A, OR-NFS-CH-SOIL, OR-NFS-CH-HOM-A, OR-NFS-CH-HOM-B, REVISION 8, December 12, 2013
- Waste Stream OR-ISTP-CH-HET (S5000-CH) in CCP-AK-ORNL-008 Central Characterization Program Acceptable Knowledge Summary Report For Oak Ridge National Laboratory Isotopes Programs Contact-Handled Transuranic Waste Waste Stream: OR-ISTP-CH-HET, Revision 1, January 9, 2014
- Waste Steam OR-REDC-RH-HET (S5000-RH) in CCP-AK-ORNL-500, Central Characterization Program Acceptable Knowledge Summary Report For Oak Ridge National Laboratory Radiochemical Engineering Development Center Remote-Handled Transuranic Waste, Waste Stream: OR-REDC-RH-HET, REVISION 3, January 8, 2014

Source Documents and references provided during the audit are presented in Attachment A.

The CH-S4000 soil and RH- S5000 debris waste streams are the same waste streams approved prior to site shut down. The S4000 soil waste stream, originating at NFS during site D&D and cleanup, was expanded to include a potential inventory increase of 4300 55-gallon drums to be generated through site remediation up until 2018. The RH S5000 waste stream (debris generated in Building 7920 during fabrication of target rods) has been revised to include seven additional containers generated by repackaging since reinstatement of the CCP Oak Ridge characterization program in September, 2013. The S3000 waste stream is a new homogenous stream generated by solidification of hot cell and laboratory fines originating in Buildings 234 and 110 at the NFS facility; fines were created through general testing and handling of MOX fuel as well as other hot cell activities. The new CH ISTP debris stream is a general debris waste generated under the Oak Ridge Isotopes Program wherein medical and other specialized radioactive isotopes were produced for commercial and defense sales.

The two new waste streams (OR-NFS-CH-HOM-A and OR-ISTP-CH-HET ) were examined to determine whether the waste streams were appropriately defined, characterized and documented per all AK requirements in the permit. Waste Stream OR-NFS-CH-HOM-A was adequately defined. It was noted that the ISTP debris waste stream contained a wide variety of debris types, and the hazardous waste numbers assigned to the waste stream as a whole were only well documented in three of the nine building associated with the Isotopes Program. As such, the commonality or similarity of physical and chemical composition was not well documented. However, the commonality of *process*, i.e. specialized isotope manufacturing, best supported the waste stream designation. This example is a case where the process requirements of the waste stream definition were critical to the determination of that waste stream.

Additionally, freeze file modifications were required of the OR-NFS-CH-Soil and OR-REDC-RH-HET waste streams at the 2011 recertification audit in March, 2011. Waste Stream OR-NFS-CH-Soil was modified in May, 2011 to integrate the AK Summary changes, but Waste Stream OR-REDC-RH-HET wasn't modified until January 2014. Also, file changes were identified for the following waste stream during the 2012 closeout:

- CCP-AK-ORNL-006, Central Characterization Project Acceptable Knowledge Summary Report For Oak Ridge National Laboratory General Research and Development Contact-Handled Transuranic Waste, Waste Stream: OR-GENR-CH-HET, Revision 1, January 20, 2011

The AK Summary CCP-AK-ORNL-006 has yet to be updated to include the freeze file changes. There is no requirement in the permit or CCP-TP-005 regarding timing of freeze file integration and to the best of our knowledge no other CCP procedure addresses this issue. Note that EPA no longer accepts freeze files as final evidence of AK Summary revision because of issues associated with timely revision of AK Summaries to address EPA concerns identified during inspections.

The AK Auditor provided the following concerns at the audit:

“It is recommended that the following changes be made to the AK Summary CCP-AK-ORNL-001 R8 for clarification.

1. Section 2.2: Delete the reference to stainless steel bands. They are an unacceptable closure device and were not used for the soil waste stream.
2. Section 6.3.1.3: Revise the inclusive dates for the soil excavation project from 2011-2012 to 2011-2018
3. Adjust the waste material parameter weight (Table 6-1) for soil, as needed, to account for the inorganic matrix noted in the text for “Solid-A-Sorb” absorbent material.”

CCP also elected to revise CCP-AL-ORNL-001 to add sampling and analysis results obtained from ongoing RCRA-based activities at the NFS site. This is important because these outside activities may include sampling for hazardous constituents and hazardous waste, and CCP must integrate these AK data from other sources, particularly since the permit no longer requires sampling and analysis.

In addition to these listed recommendations, the auditor and observer noted editorial errors in CCP-AK-ORNL-500, a few of which CCP has elected to change via freeze file (See Attachment B). Also, CCP submitted a freeze file to add a missing section discussing Building 3030 in CCP-AK-ORNL-008, and to clarify that the identification of radiological pyrophorics is first screened by the site using fast scan (not CCP) RTR. This change clarified that any drums with pyrophoric foils or materials would have been removed by fast scan pre-screening prior to receipt for characterization by CCP.

## **ATTACHMENT A REFERENCES**

*Note: All references available electronically will be copied to a disk and provided to the NMED representatives at the next 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 Summaries and General References:**

- CCP-AK-ORNL-001, Central Characterization Program Acceptable Knowledge Summary Report For Nuclear Fuel Services, Contact-Handled Transuranic Waste Stored at Oak Ridge National Laboratory, Waste Streams: OR-NFS-CH-HET-A, OR-NFS-CH-SOIL, OR-NFS-CH-HOM-A, OR-NFS-CH-HOM-B, REVISION 8, December 12, 2013
- CCP-AK-ORNL-002, Central Characterization Project Acceptable Knowledge Summary Report For Oak Ridge National Laboratory Radiochemical Engineering Development Center Contact-Handled Transuranic Waste: Waste Stream: OR-REDC-CH-HET, REVISION 2, October 6, 2010
- CCP-AK-ORNL-008 Central Characterization Program Acceptable Knowledge Summary Report For Oak Ridge National Laboratory Isotopes Programs Contact-Handled Transuranic Waste, Waste Stream: OR-ISTP-CH-HET, Revision 1, January 9, 2014
- CCP-AK-ORNL-500, Central Characterization Program Acceptable Knowledge Summary Report For Oak Ridge National Laboratory Radiochemical Engineering Development Center Remote-Handled Transuranic Waste, Waste Stream: OR-REDC-RH-HET, REVISION 3, January 8, 2014
- Quality Assurance Audit I13-06, Transmittal and Closure of Audit, Central Characterization Program Quality Assurance Program, 10/17/2013
- ORNL CH AKT-AK-Tracking-Spreadsheet, 1/01/2014
- ORNL RH AKT-AK-Tracking-Spreadsheet, 12/20/2013
- Container Inspection Forms, file dated 1/09/2014
- CCP-AK-ORNL-008-REV1-Approval Print Screens, file dated 10/9/2014
- CCP-AK-ORNL-500-REV3-Approval Print Screens, file dated 1/09/2014
- IDC SCREEN SHOTS, Select Waste Stream Containers, file dated 1/09/2014
- NCR-ORNL-0152-09, file dated 01/09/2014
- NCR-ORNL-0153-09\_R1., filed dated 4/7/2010
- NCR-ORNL-0181-08, file dated 4/15/2009
- NCR-ORNL-0230-14-0, file dated 10/9/2014

- Quality Assurance Audit I13-06, Transmittal and Closure of Audit, Central Characterization Program (CCP) Quality Assurance Program, October 17, 2013

**Waste Stream OR-ISTP-CH-HET:**

- AK Accuracy Report, LOTS1-3, OR-ISTP-CH-HET, 5/29/2012
- CCP-TP-005, Attachment 1, Acceptable Knowledge Documentation Checklist, OR-ISTP-CH-HET, 1/06/2014
- CCP-TP-005, Attachment 4, Acceptable Knowledge Information List, OR-ISTP-CH-HET, 1/07/2014
- CCP-TP-005, Attachment 5, Hazardous Constituents, OR-ISTP-CH-HET, 5/17/11
- CCP-TP-005, Attachment 6, Waste Form, Waste Material Parameters, Prohibited Items, and Packaging, OR-ISTP-CH-HET, 5 17/2011
- CCP-TP-005, Attachment 8, Waste Containers List OR-ISTP-CH-HET, 12/06/2013
- CCP-TP-005, Attachment 13 , AK Characterization Checklist, LOT1, OR-ISTP-CH-HET , 12/16/2013
- CCP-TP-005, Attachment 13, AK Characterization Checklist, LOT2, 10/10/2011
- CCP-TP-005, Attachment 13, AK Characterization Checklist, LOT3, OR-ISTP-CH-HET, 10/10/2011
- Characterization Information Summary, LOT 2, OR-ISTP-CH-HET , 1/12/2012
- Characterization Information Summary, LOT 3, OR-ISTP-CH-HET , 12/12/2013
- Waste Stream Profile Form, Waste Stream OR-ISTP-CH-HET, 3/07/2012

**Waste Stream OR-NFS-CH-HOM-A:**

- CCP-TP-005, Attachment 1, Acceptable Knowledge Documentation Checklist, OR-NFS-CH-HOM-A, 1/07/2014
- CCP-TP-005, Attachment 4, Acceptable Knowledge Information List, OR-NFS-CH-HOM-A, 1/06/2014
- CCP-TP-005, Attachment 5, Hazardous Constituents, OR-NFS-CH-HOM-A, 12/16/2010
- CCP-TP-005, Attachment 6, Waste Form, Waste Material Parameters, Prohibited Items, and Packaging, OR-NFS-CH-HOM-A, 12/05/2013
- CCP-TP-005, Attachment 8, Waste Container List, OR-NFS-CH-HOM-A, 12/05/2013
- Waste Stream Profile Form, Draft, OR-NFS-CH-HOM-A, 10/9/2014

**Waste Stream OR-NFS-CH-SOIL:**

- AK Accuracy Report, LOT 1-10, OR-NFS-CH-SOIL, 12/18/2009
- AK Accuracy Report, LOT 12, OR-NFS-CH-SOIL, 03/22/2012
- AK Accuracy Report, LOT 11, OR-NFS-CH-SOIL, 01/01/2011
- AK Accuracy Report, LOT11, OR-NFS-CH-SOIL, Revised 02/09/2011
- CCP-TP-005, Attachment 1, Acceptable Knowledge Documentation Checklist, OR-NFS-CH-SOIL, 1/07/2014

- CCP-TP-005, Attachment 4, Acceptable Knowledge Information List, OR-NFS-CH-SOIL, 1/06/2014
- CCP-TP-005, Attachment 6, Waste Form, Waste Material Parameters, Prohibited Items, and Packaging, OR-NFS-CH-SOIL, 12/05/2013
- CCP-TP-005, Attachment 8, Waste Containers List, OR-NFS-CH-SOIL, 12/05/2013
- CCP-TP-005, Attachment 10, Acceptable Knowledge Re-evaluation Checklist, OR-NFS-CH-SOIL, 10/08/2009
- CCP-TP-005, Attachment 10, Acceptable Knowledge Re-evaluation Checklist, OR-NFS-CH-SOIL, 03/05/2010
- CCP-TP-005, Attachment 10, Acceptable Knowledge Re-evaluation Checklist, OR-NFS-CH-SOIL, 03/22/2010
- CCP-TP-005, Attachment 10, Acceptable Knowledge Re-evaluation Checklist, OR-NFS-CH-SOIL, 07/07/2010
- CCP-TP-005, Attachment 13, Waste Stream Characterization Checklist, OR-NFS-CH-SOIL , 1/25/2010
- CCP-TP-005, Attachment 13, Waste Stream Characterization Checklist, LOT11, OR-NFS-CH-SOIL, 1/06/2011
- CCP-TP-005, Attachment 13, Waste Stream Characterization Checklist, LOT12, OR-NFS-CH-SOIL, 10/10/2011
- CCP-TP-005, Attachment 13, Waste Stream Characterization Checklist, LOT2, OR-NFS-CH-SOIL, 1/25/2010
- CCP-TP-005, Attachment 13, Waste Stream Characterization Checklist, LOT3, OR-NFS-CH-SOIL, 1/25/2010
- CCP-TP-005, Attachment 13, Waste Stream Characterization Checklist, LOT4, OR-NFS-CH-SOIL, 1/25/2010
- CCP-TP-005, Attachment 13, Waste Stream Characterization Checklist, LOT5, OR-NFS-CH-SOIL, 1/25/2010
- CCP-TP-005, Attachment 13, Waste Stream Characterization Checklist, LOT6, OR-NFS-CH-SOIL, 1/25/2010
- CCP-TP-005, Attachment 13, Waste Stream Characterization Checklist, LOT7, OR-NFS-CH-SOIL, 1/25/2010
- CCP-TP-005, Attachment 13, Waste Stream Characterization Checklist, LOT8, OR-NFS-CH-SOIL, 1/25/2010
- CCP-TP-005, Attachment 13, Waste Stream Characterization Checklist, LOT9, OR-NFS-CH-SOIL, 1/25/2010
- Characterization Information Summary, LOT 10, OR-NFS-CH-SOIL, file dated 2/02/2010
- Characterization Information Summary, LOT 11, OR-NFS-CH-SOIL, file dated 6/08/2011
- Characterization Information Summary, LOT 12, OR-NFS-CH-SOIL, file dated 9/13/2011
- Characterization Information Summary, LOT 2, OR-NFS-CH-SOIL, file dated 2/02/2010
- Characterization Information Summary, LOT 3, OR-NFS-CH-SOIL, file dated 2/02/2010
- Characterization Information Summary, LOT 4, OR-NFS-CH-SOIL, file dated 2/02/2010
- Characterization Information Summary, LOT 5, OR-NFS-CH-SOIL , file dated 3/22/2010
- Characterization Information Summary, LOT 6, OR-NFS-CH-SOIL, file dated 2/02/2010
- Characterization Information Summary, LOT 7, OR-NFS-CH-SOIL, file dated 3/08/2010
- Characterization Information Summary, LOT 8, OR-NFS-CH-SOIL , file dated 3/08/2010

- Characterization Information Summary, LOT 9, OR-NFS-CH-SOIL , file dated 6/28/2010
- Waste Stream Profile Form, OR-NFS-CH-SOIL, 2/02/2010

**Waste Stream OR-REDC-RH-HET:**

- CCP-TP-005, Attachment 1, Acceptable Knowledge Documentation Checklist, OR-REDC-RH-HET, 12/30/2013
- CCP-TP-005, Attachment 8 and Add Container Memo, OR-REDC-RH-HET, 1/03/2014
- Characterization Information Summary, OR-REDC-RH-HET Combined Lot 29, file dated 1/09/2014
- Characterization Reconciliation Report, OR-REDC-RH-HET Lot 29, file dated 1/09/2014
- Characterization Information Summary, OR-REDC-RH-HET, Lot 28, 09/19/2011
- Characterization Reconciliation Report, OR-REDC-RH-HET, Lot 28, file dated 9/21/2011

The following Source Documents were also provided (See the AK Summary Reports and the Attachment 4 for each waste stream for specific reference citations associated with each Source Document number):

- C034,C087,C089,C096,C097,C099,C122,C142,C145,C200,C203,C205,C206,C209,C210,C227SD, C230, C309SD, C32SD
- DR001, DR002, DR005, DR006, DR008, DR009, DR010,DR013, DR015,DR022, DR023, DR024, DR025, DR026,DR030, DR031, DR600, DR601, DR602
- I012, I053, I067,
- M053, M054, M064, M065, M068, M075, M126, M132\_SD, M171, M187, M188, M189, M190, M191, M192, M198, M198\_ADD1, M202\_SD, M206, M210, M217, M235
- P254, P274, P276, P283, P300, P303, P306,P315, P317, P319, P320, P323, P528, P532, P546, P548, P762, P831, P867, P876, P905,P917, P933
- U007, U016, U017, U038, U038, U043, U044, U054, U055, U058, U472, U475, U580, U680

Note that no Waste Stream OR-REDC-RH-HET source documents were requested by the CTAC auditor. The auditor had all source documents for the waste stream from previous audits, and no new references were added since the previous audit. The NMED observer had the references from previous audits and these have been provided to NMED in the past, so this approach was not problematic this audit. However, it is possible that future audit observers may not have access to documents provided at previous audits, so NMED may need to obtain documents well beyond those requested by the CTAC auditor.

**ATTACHMENT B  
ACCEPTABLE KNOWLEDGE FREEZE FILES**

**AK Summary CCP-AK-ORNL-500  
WASTE STREAM OR-REDC-RH-HET**

Jose,

Please include this email in the freeze file for CCP-AK-ORNL-500.

In the last paragraph of Section 4.5, make the following change:

The SNF and HLW requirements were reviewed by the ORNL operating contractor (Bechtel Jacobs Company, LLC) and DOE-Oak Ridge Operations(References U038 and U647).  
Based on this

evaluation it was determined that the targets processed in the REDC are not SNF. Additionally, the LWR and fast reactor test specimens associated with the SETF program involved the processing of these materials for development of separation and recovery technologies (References U038 and U647).

Thanks you.

Kevin J. Peters

Technical Specialists

Acceptable Knowledge

(303)949-7525

## Jeff Harrison

---

**From:** Jeff Harrison <Trash\_Talk@msn.com>  
**Sent:** Thursday, January 16, 2014 8:13 AM  
**To:** 'Payanes, Jose'  
**Cc:** Dick Blauvelt; Connie Walker  
**Subject:** Freeze File for ORNL-001

Jose,

Please add this email to the freeze file for CCP-AK-ORNL-001.

- 1) Section 2.2, Page 18: Remove discussion of stainless-steel band used for packaging. These were not used for soil repackaging.
- 2) Section 4.4.2: Include a brief discussion of Building 110.
- 3) Section 6.3.1.3, 1<sup>st</sup> para: Change 2012 to FY2018 and cite C230.
- 4) Section 6.4.1.2: Change "Soli-A-Absorb" to "Solid-A-Absorb"
- 5) Table 6-1: Add a footnote to Inorganic Matrix indicating the Solid-A-Sorb used for repackaging of soil boxes is a minor component of the overall waste stream (about 0.44% currently and will be <0.1% once the additional 4300 drums are included).
- 6) Section 6.4.3: Add new last bullet indicating sampling and analysis of soil from the final phase of decommissioning is being conducted and cite P1372. Try and collect these data prior to revising the report so the data can also be cited.
- 7) Section 6.5: Move 2<sup>nd</sup> para to end of section.

## Jeff Harrison

Nuclear Waste Partership LLC  
Contractor for the U.S. Department of Energy  
[Trash\\_Talk@msn.com](mailto:Trash_Talk@msn.com) (e-mail)  
720.977.7042 (office)  
303.918.8791 (cell)  
720.977.7042 (fax)

**Jeff Harrison**

---

**From:** Jeff Harrison <Trash\_Talk@msn.com>  
**Sent:** Thursday, January 16, 2014 9:34 AM  
**To:** 'Payanes, Jose'  
**Subject:** FW: ORNL-008 Freeze File

Jose,

Please include the following in the freeze file for ORNL-008:

Section 5.5, Change the following sentence to read as follows:

“Therefore, to ensure radionuclide pyrophorics are completely reacted before disposal at WIPP, inner containers (regardless of size) in all drums in waste stream OR-ISTP-CH-HET are examined during waste repackaging, ~~or by RTR fast scan~~, or VE to determine if they contain a potentially pyrophoric or other reactive material.”

**Jeff Harrison**

Nuclear Waste Partership LLC  
Contractor for the U.S. Department of Energy  
[Trash\\_Talk@msn.com](mailto:Trash_Talk@msn.com) (e-mail)  
720.977.7042 (office)  
303.918.8791 (cell)  
720.977.7042 (fax)

**From:** Jeff Harrison [mailto:Trash\_Talk@msn.com]  
**Sent:** Thursday, January 16, 2014 8:14 AM  
**To:** 'Payanes, Jose'  
**Cc:** Dick Blauvelt; Connie Walker  
**Subject:** ORNL-008 Freeze File

Jose,

Please add this email to the freeze file for CCP-AK-ORNL-008.

Add a subsection in Section 5.3 for Building 3030. This discussion will be brief to include essentially the same information as in Section 4.4.1.3.

**Jeff Harrison**

Nuclear Waste Partership LLC  
Contractor for the U.S. Department of Energy  
[Trash\\_Talk@msn.com](mailto:Trash_Talk@msn.com) (e-mail)  
720.977.7042 (office)  
303.918.8791 (cell)  
720.977.7042 (fax)

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

**AUDIT A-14-03**  
**ORNL/CCP Recertification Audit, January 14 – 16, 2014**

No.	Who	Description of Concern	Requirements Comments
1	R. Bradford P.Y. Martinez	An obsolete version of CCP-AK-ORNI-500 (Rev 2) was observed being used during VE activities on January 14, 2014. CCP-AK-ORNL-500, Revision 3, was issued on January 8, 2014, and is the current revision.	CCP-QP-010, Rev. 24, Sec. 4.2 (Note) states, "Approved documents must be used to ensure that tasks are performed in a consistent manner that results in achieving the quality required. At the beginning of each shift, CCP personnel will confirm the current revision of the document is being used. This revision of the document will be used throughout the shift unless a STOP WORK order is issued."
2	D. Blauvelt K. Martin	It is recommended that the following changes be made to the AK Summary CCP-AK-ORNL-001 R8 for clarification.  1. Section 2.2: Delete the reference to stainless steel bands. They are an unacceptable closure device and were not used for the soil waste stream. 2. Section 6.3.1.3: Revise the inclusive dates for the soil excavation project from 2011-2012 to 2011-2018. 3. Adjust the waste material parameter weight (Table 6-1) for soil, as needed, to account for the inorganic matrix noted in the text for "Solid-A-Sorb" absorbent material.	
3	K. Kirkes	VE BDR #ORNLRHVE13006 (page 2) contained incorrect information (wrong BDR number). The VE Operator lined out, initialed, dated, and entered the correct BDR number. Question #8 on the ITR checklist asks, "Are all changes to original data lined out, initialed and dated by the individual making the changes or an individual authorized to make the change?" The	CCP-PO-001, Revision 21, Section C3-4b(1) states, "This signature release ensures the following: Batch data review checklists are complete."

		initial answer was checked as “N/A.” The ITR checklist was not corrected and re-signed by the ITR after the correction was performed. <b>REVISED</b>	
4	P. Martinez C. Castillo	RTR data sheet for container #NFS0117A in BDR #OR-RTR7-0009 did not note the estimated number of layers of confinement, as required.  Note: This instance was the only one identified by the audit team after reviewing 8 BDRs with approximately 10-15 containers per BDR.	CCP-TP-053, CCP Standard Real-Time Radiography (RTR) Inspection Procedure, Rev. 14, Section 4.4.2D states, “Ensure the following data is recorded in Section 2, Waste Container Data, of Attachment 2: [D.7] Estimated number of Layers of confinement.”