



**Department of Energy**  
 Carlsbad Field Office  
 P. O. Box 3090  
 Carlsbad, New Mexico 88221

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**MAY 2 2014**

NMED  
 Hazardous Waste Bureau

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: Transmittal of the Audit Plan and Notification of Assigned Auditors for Recertification  
 Audit A-14-18, INL/CCP TRU Waste Characterization Activities

Dear Mr. Kieling:

This letter transmits the audit plan for Carlsbad Field Office (CBFO) Recertification Audit A-14-18 of the Idaho National Laboratory Central Characterization Program (INL/CCP) Transuranic (TRU) Waste Characterization Activities. The audit will be conducted as required by the Waste Isolation Pilot Plant (WIPP) Hazardous Waste Facility Permit (HWFP) Section C4-3g, and will be held at the INL/CCP facilities near Idaho Falls, Idaho, and the Skeen-Whitlock Building in Carlsbad, New Mexico, on June 3-5, 2014. The audit plan identifies the audit team members as required by Permit Section C6-3.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision according to a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

If you have any questions concerning Audit A-14-18, please contact Mr. Michael R. Brown, Director, Office of Quality Assurance, at (575) 234-7476.

Sincerely,

  
 Jose R. Franco, Manager  
 Carlsbad Field Office

Enclosure

cc: w/enclosure

D. Bryson, CBFO	*ED	R. Allen, CTAC	ED
M. Brown, CBFO	ED	P. Martinez, CTAC	ED
G. Basabilvazo, CBFO	ED	B. Pace, CTAC	ED
D. Miehl, CBFO	ED	T. Ackman, CTAC	ED
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T. Kliphuis, NMED	ED	G. White, CTAC	ED
S. Holmes, NMED	ED	A. Urquidez, RES	ED
R. Maestas, NMED	ED	CBFO QA File	
C. Smith, NMED	ED	CBFO M&RC	
V. Daub, CTAC	ED	*ED denotes	



### CARLSBAD FIELD OFFICE AUDIT PLAN

**Audit Number:** A-14-18

**Organization to be Audited:** Idaho National Laboratory  
Central Characterization Program (INL/CCP)

**Organizations to be Notified:** U.S. Department of Energy – Idaho Falls (DOE-ID)  
U.S. Environmental Protection Agency (EPA)  
Nuclear Waste Partnership LLC (NWP)  
New Mexico Environment Department (NMED)

**Date and Location:** June 3 – 5, 2014  
Idaho Falls, ID, and Carlsbad, NM

**Audit Team:**

Dennis Miehls	Carlsbad Field Office (CBFO) Management Representative
Martin Navarrete	CBFO Office of Quality Assurance Representative
Tamara Ackman	Audit Team Leader, CBFO Technical Assistance Contractor (CTAC)
Berry Pace	Auditor, CTAC (RTR)
Charlie Riggs	Auditor, CTAC (VE)
Cindi Castillo	Auditor, CTAC (NDA and DTC)
Harley Kirschenmann	Auditor, CTAC (AK)
Jim Schuetz*	Auditor, CTAC (C6 QA)
Katie Martin*	Auditor, CTAC (C6 QA)
Mike Noland	Auditor in Training, CTAC
B.J. Verret	Auditor/Technical Specialist, CTAC (GGT, Flam Gas, and Container Management)
Porf Martinez	Technical Specialist, CTAC (RTR and VE)
Paul Gomez	Technical Specialist, CTAC (PL V&V)
Dick Blauvelt	Technical Specialist, CTAC (AK)
Charleen Roberts	Technical Specialist, CTAC (AK)
Jim Oliver	Technical Specialist, CTAC (NDA and DTC)
Greg Knox	Technical Specialist in Training, CTAC (RTR and VE)
Rick Castillo	Technical Specialist in Training, CTAC (VE)

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\*Personnel auditing in Carlsbad, NM

**Audit Scope:**

The audit team will evaluate the continued adequacy, implementation, and effectiveness of INL/CCP transuranic waste activities as they relate to the Waste Isolation Pilot Plant (WIPP) Hazardous Waste Facility Permit for characterization and certification of contact-handled Summary Category Groups (SCGs) S3000 homogeneous solids, S4000 soils/gravel, S5000 debris waste, and remote-

handled SCG S3000 homogeneous solids and S5000 debris waste. The specific items to be audited are listed under Activities to be Audited.

**Activities to be Audited:**

**General**

- Results of previous audits
- Changes in programs or operations
- New programs or activities being implemented
- Changes in key personnel

**C6-1 and C6-3 Related Quality Assurance Activities in Carlsbad, NM**

- Personnel Qualification and Training
- Records
- Quality Improvement/Nonconformances
- WIPP Waste Information System/Waste Data System (WWIS/WDS)

The following technical elements will be evaluated for compliance with the Permit, utilizing the checklists in Attachment C6.

**INL (Idaho Falls)**

- Acceptable Knowledge (AK)
- Waste Certification (e.g., Waste Stream Profile Forms)
- Project-level Data Validation and Verification (V&V)
- Real-time Radiography (RTR)
- Visual Examination (VE)
- Sample Control
- Nondestructive Assay (NDA)
- Dose-to-Curie (DTC)
- Flammable Gas Analysis
- Gas Generation Testing (GGT)
- Container Management

For additional details see the attached *Processes and Equipment to be Reviewed During Audit A-14-18 of INL/CCP*.

**Governing Documents/Requirements:**

Adequacy of INL/CCP documents will be based on the current revisions of the following documents:

- Waste Isolation Pilot Plant Hazardous Waste Facility Permit NM4890139088-TSDF
- DOE/CBFO-94-1012, *Quality Assurance Program Document*

- DOEWIPP-02-3214, *Remote-Handled TRU Waste Characterization Program Implementation Plan*
- DOEWIPP-02-3122, *Transuranic Waste Acceptance Criteria for the Waste Isolation Pilot Plant*

Programmatic and technical checklists will be developed from the active revisions of the following documents:

- CCP-PO-001, *CCP Transuranic Waste Characterization Quality Assurance Project Plan*
- CCP-PO-002, *CCP Transuranic Waste Certification Plan*
- CCP-PO-024, *CCP/INL Interface Document*
- CCP-PO-501, *CCP/INL RH TRU Waste Interface Document*

Related INL/CCP and NWP CCP QA and technical implementing procedures

#### **Schedule of Audit Activities:**

A pre-audit conference will be held Tuesday, June 3, 2014, at 8:30 a.m.

Audit team caucus meetings will be held Tuesday and Wednesday, June 3 and 4, 2014, at 4:00 p.m.

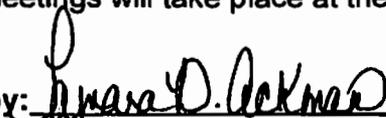
Daily management briefings will be held Wednesday and Thursday, June 4 and 5, 2014, at 8:30 a.m.

An audit team caucus meeting will be held Thursday, June 5, 2014, at 2:00 p.m.

A post-audit conference is scheduled for Thursday, June 5, 2014, at 3:30 p.m.

All meetings will take place at the designated INL and Carlsbad locations.

Prepared by:

  
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Tamara D. Ackman, CTAC  
Audit Team Leader

Date:

4/30/14

Concurrence:

  
\_\_\_\_\_  
Michael R. Brown, Director  
Office of Quality Assurance

Date:

4/30/14

## Processes and Equipment to be Reviewed During Audit A-14-18 of the INL/CCP

WIPP #	Process/Equipment Description	Applicable to the Following Waste Streams/Groups of Waste Streams	Currently Approved by NMED	Currently Approved by EPA
<b>NEW PROCESSES OR EQUIPMENT</b>				
N/A	N/A	N/A	N/A	N/A
<b>PREVIOUSLY APPROVED PROCESSES OR EQUIPMENT</b>				
14VE1	Visual Examination (VE) Procedure – CCP-TP-006 Description – Visual Examination Technique (VET)	Solids (S3000) Soils (S4000) Debris (S5000)	YES	YES
14RHVE1	Visual Examination Procedure – CCP-TP-500 Description - The VE of audio/video media process used for a total of 70 retrievably stored remote-handled (RH) debris waste drums	Solids (S3000) Soils (S4000) Debris (S5000)	YES	YES
14RR2	Nondestructive Examination Procedure – CCP-TP-053 Equipment – MCS RTR-5 Description – MCS Real-time Radiography (RTR) Mobile Characterization (RTR-5) System	Solids (S3000) Debris (S5000)	YES	YES
14RRH1	Nondestructive Examination Procedure – CCP-TP-508 Equipment – RTR-RTR-0659 Description – VJ Technologies, Real-time Radiography Characterization (RTR-RTR-0659) System	Solids (S3000) Debris (S5000)	YES	YES
N/A	Acceptable Knowledge	Solids (S3000) Soils (S4000) Debris (S5000)	YES	YES
N/A	Data Validation and Verification	Solids (S3000) Soils (S4000) Debris (S5000)	YES	YES

## Processes and Equipment to be Reviewed During Audit A-14-18 of the INL/CCP

WIPP #	Process/Equipment Description	Applicable to the Following Waste Streams/Groups of Waste Streams	Currently Approved by NMED	Currently Approved by EPA
N/A	WIPP Waste Information System (WWIS)/Waste Data System (WDS)	Solids (S3000) Soils (S4000) Debris (S5000)	YES	YES
14SHC1	Nondestructive Assay Procedure – CCP-TP-146 Description – CCP Super High Efficiency Neutron Counter	Solids (S3000) Debris (S5000)	N/A	YES
14SGRS1	Nondestructive Assay Procedure – CCP-TP-115 Description – Stored Waste Examination Pilot Plant (SWEPP) Gamma Ray Spectrometer (SGRS)	Solids (S3000) Soils (S4000) Debris (S5000)	N/A	YES
14WAGS1	Nondestructive Assay Procedure – CCP-TP-019 Description – Waste Assay Gamma Spectrometer	Solids (S3000) Soils (S4000) Debris (S5000)	N/A	YES
14DTC1	Radiological characterization process using dose-to-curie (DTC) and modeling-derived scaling factors for assigning radionuclide values to RH waste stream  Dose-rate fractional contribution of Cs-137 and Co-60 using OSPREY La <sub>3</sub> Br(Ce) gamma detector  Procedure CCP-TP-504	Solids (S3000) Debris (S5000)	N/A	YES
14GG1	Gas Generation Testing Procedure – CCP-TP-089 Equipment – MGSS Unit/Cart 1 (GC-14B) Description – Gas Generation Testing 55-gallon drums	Waste Type IV	N/A	N/A
14GG2	Gas Generation Testing Procedure – CCP-TP-089 Equipment – MGSS Unit/Cart 2 (GC-17A) Description – Gas Generation Testing 55-gallon drums	Waste Type IV	N/A	N/A

**Processes and Equipment to be Reviewed During Audit A-14-18 of the INL/CCP**

WIPP #	Process/Equipment Description	Applicable to the Following Waste Streams/Groups of Waste Streams	Currently Approved by NMED	Currently Approved by EPA
N/A	Load Management	Solids (S3000) Soils (S4000) Debris (S5000)	N/A	YES
N/A	Quality Assurance Program	Solids (S3000) Soils (S4000) Debris (S5000)	N/A	YES