

United States Government



# memorandum

Carlsbad Field Office  
Carlsbad, New Mexico 88221

DATE: JUN 13 2014  
 REPLY TO: CBFO:OQA:DSM:MAG:14-1173:UFC 2300.00  
 ATTN OF:  
 SUBJECT: Notification of CBFO Recertification Audit A-14-19, LANL/CCP TRU Waste Characterization Activities  
 TO: David Nickless, Los Alamos Field Office (LAFO)

Please be advised that a team of auditors and technical specialists from the Carlsbad Field Office (CBFO) will conduct Recertification Audit A-14-19 of the Los Alamos National Laboratory (LANL) Central Characterization Program (CCP), for the recertification of contact-handled transuranic (TRU) waste characterization activities. The audit is scheduled for July 15-17, 2014 and will be conducted in accordance with the attached audit plan. Representatives from the New Mexico Environment Department (NMED) may be present to observe the audit.

Your representatives are requested to coordinate with the audit team to provide access to the LANL/CCP facilities and appropriate space to conduct meetings. Please arrange to have cognizant personnel available to support the audit and to provide access to appropriate documentation and records.

If you have any questions concerning Audit A-14-19, please contact me at (575) 234-7491.

Dennis S. Miehls  
Senior Quality Assurance Specialist

## Attachment

cc: w/attachment

S. Ross, EM-43	*ED	L. Bender, EPA	ED
R. Toro, EM-43	ED	E. Feltcorn, EPA	ED
L. Bishop, LAFO	ED	R. Joglekar, EPA	ED
M. Brown, CBFO	ED	S. Ghose, EPA	ED
J. R. Stroble, CBFO	ED	R. Lee, EPA	ED
M. Navarrete, CBFO	ED	J. Kieling, NMED	ED
R. McQuinn, NWP	ED	T. Kliphuis, NMED	ED
J. Blankenhorn, NWP	ED	S. Holmes, NMED	ED
J. Harris, NWP	ED	R. Maestas, NMED	ED
F. Sharif, NWP/CCP	ED	C. Smith, NMED	ED
D.E. Gulbransen, NWP/CCP	ED	V. Daub, CTAC	ED
V. Cannon, NWP/CCP	ED	R. Allen, CTAC	ED
A.J. Fisher, NWP/CCP	ED	P. Martinez, CTAC	ED
M. Walker, NWP/CCP	ED	B. Pace, CTAC	ED
W. Ledford, NWP/CCP	ED	R. Castillo, CTAC	ED
J. Carter, NWP/CCP	ED	D. Harvill, CTAC	ED
J. Hoff, NWP/QA	ED	G. White, CTAC	ED
B. Allen, NWP/QA	ED	Site Documents	ED
S. Punchios, NWP/QA	ED	CBFO QA File	
S. Escareno-Soto, NWP/QA	ED	CBFO M&RC	
T. Peake, EPA	ED	*ED denotes electronic distribution	



### CARLSBAD FIELD OFFICE AUDIT PLAN

**Audit Number:** A-14-19

**Organization to be Audited:** Los Alamos National Laboratory (LANL) Central Characterization Project (CCP)  
Nuclear Waste Partnership LLC (NWP)

**Organizations to be Notified:** NWP/CCP  
U.S. Department of Energy, Los Alamos Field Office (DOE/LAFO)  
U.S. Environmental Protection Agency (EPA)  
New Mexico Environment Department (NMED)

**Date and Location:** July 15 – 17, 2014  
Los Alamos, New Mexico

**Audit Team:**

Michael R. Brown	CBFO Office of Quality Assurance, Director
Dennis Miehls	CBFO Office of Quality Assurance, Audit Team Management Representative
Berry Pace	Audit Team Leader, CBFO Technical Assistance Contractor (CTAC)
Cindi Castillo	Auditor, CTAC (RTR)
Katie Martin*	Auditor, CTAC (C6 QA)
Jim Schuetz*	Auditor, CTAC (WWIS/WDS)
Charlie Riggs	Auditor, CTAC (AK)
H. Kirschenmann	Auditor, CTAC (NDA)
Priscilla Martinez	Auditor, CTAC (VE)
Mike Noland*	Auditor in Training, CTAC (C6 QA)
Paul Gomez	Technical Specialist, CTAC (PL V&V)
Porf Martinez	Technical Specialist, CTAC (RTR)
Dick Blauvelt	Technical Specialist, CTAC (AK, Waste Certification & Load Management)
Rick Castillo	Technical Specialist, CTAC (VE)
James Oliver	Technical Specialist, CTAC (NDA)
B. J. Verret	Technical Specialist, CTAC (Flam Gas, Container Management, and Shipping Documentation)
Tamara Ackman	Technical Specialist in Training, CTAC (VE)
Greg Knox	Technical Specialist in Training, CTAC (RTR)

\* Indicates audit team members working at the Skeen-Whitlock building in Carlsbad, NM.

#### **Audit Scope:**

The audit team will evaluate the continued adequacy, implementation, and effectiveness of the CCP quality assurance (QA), technical, and transportation activities performed at LANL for characterization, certification, and transportation of contact-handled (CH) Summary Category Group (SCG) S3000 homogeneous solids waste, SGC S4000 soils/gravels, and SCG S5000 debris waste. See the attached "Processes and Equipment to be Evaluated During Audit A-14-19 of the LANL/CCP," for additional details.

## **Governing Documents/Requirements**

Overall program adequacy and effectiveness of the LANL/CCP processes will be based on the current revisions of the following documents.

- DOE/CBFO-94-1012, *Quality Assurance Program Document (QAPD)*
- Waste Isolation Pilot Plant Hazardous Waste Facility Permit NM4890139088-TSDF
- DOE/WIPP-02-3122, *Transuranic Waste Acceptance Criteria for the Waste Isolation Pilot Plant*
- *Contact-Handled Transuranic Waste Authorized Methods for Payload Control (CH-TRAMPAC)*

Programmatic and technical checklists will be developed from current 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-003, *CCP Transuranic Authorized Methods for Payload Control (CCP CH-TRAMPAC)*
- CCP-PO-012, *CCP/LANL Interface Document*
- Related NWP/CCP QA and technical implementing procedures

## **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 through C6-4 and General Quality Assurance Program Elements As Applicable**

- Personnel Qualification and Training
- Nonconformances
- Records
- Identification and Control of Items
- Documents/Records Control (notebooks/logbooks)
- Software Version Installation
- Measuring and Test Equipment (M&TE)

### **Technical**

- Acceptable Knowledge (AK)
- Generation and Project-Level Data Validation and Verification (V&V)
- Visual Examination (VE)
- Visual Examination Technique (VET), Off-Site Source Recovery Program
- Real-time Radiography (RTR)
- Nondestructive Assay (NDA) and participation in the Performance Demonstration Program (PDP)

- WIPP Waste Information System (WWIS)/Waste Data System (WDS)
- Waste Certification (e.g., Waste Stream Profile Form)

**Transportation**

- Flammable Gas Analysis
- Shipping Documentation
- Container Management

**Schedule of Audit Activities:**


A pre-audit conference will be scheduled for Tuesday, July 15, 2014, at 8:30 a.m.

Audit team caucus meetings will be held Tuesday, July 15, and Wednesday July 16, 2014 at 4:00 p.m., and Thursday, July 17, 2014, at 2:00 p.m.

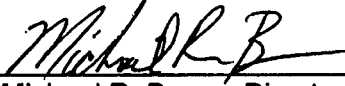
The audit team will brief appropriate LANL and CCP management on Wednesday, July 16, and Thursday, July 17, 2014, at 8:30 a.m.

A post-audit conference is scheduled for Thursday, July 17, 2014, at 3:30 p.m.

All meetings will take place at designated LANL and CBFO locations to be determined by LANL/CCP management.

Prepared by:   
Berry D. Page, Audit Team Leader  
CTAC

Date: 6/11/14

Concurrence:   
Michael R. Brown, Director  
Office of Quality Assurance

Date: 6/11/14

## Processes and Equipment to be Evaluated During Audit A-14-19 of the LANL/CCP

WIPP #	Process/Equipment Description	Applicable to the Following Waste Streams/Groups of Waste Streams	Currently Approved by NMED	Currently Approved by EPA
<b>PREVIOUSLY APPROVED PROCESSES OR EQUIPMENT</b>				
11MILCC1	Non-Destructive Assay Mobile In-Situ Object Counting System (ISOCS) Large Container Counter (MILCC) Procedure(s) – CCP-TP-076, CCP-TP-077 and CCP-TP-103	Solids (S3000) Soils/Gravel (S5000)	N/A	YES
11RR2	Real-Time Radiography (RTR) Procedures – CCP-TP-053 and CCP-TP-028 Description – Real-Time Radiography (RTR) Mobile Characterization System [built by VJ Technologies] 55-gallon drums	Solids (S3000) Soils/Gravel (S4000) Debris (S5000)	YES	YES
11HERTR3	High Energy Real-Time Radiography (HERTR) Procedures CCP-TP-053 and CCP-TP-198 Description – High Energy Real-Time Radiography (RTR) [built by VJ Technologies] 55-gallon drums and SWBs	Solids (S3000) Soils/Gravel (S4000) Debris (S5000)	YES	YES
11VE1	CH Visual Examination Procedure – CCP-TP-113 Description – CH Characterization performed utilizing Visual Examination (VE) and Acceptable Knowledge (AK)	Solids (S3000) Soils/Gravel (S4000) Debris (S5000)	YES	YES
11VE2	Off-Site Source Recovery Program Procedure(s) – CCP-TP-069 and CCP-TP-101 Description – Characterization performed utilizing Visual Examination (VE) and Acceptable Knowledge (AK)	Debris (S5000)	YES	YES

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WIPP #	Process/Equipment Description	Applicable to the Following Waste Streams/Groups of Waste Streams	Currently Approved by NMED	Currently Approved by EPA
N/A	Acceptable Knowledge Procedure – CCP-TP-005 Description – Acceptable Knowledge (AK)	Solids (S3000) Soils/Gravel (S4000) Debris (S5000)	YES	YES
N/A	Data Verification and Validation Procedure(s) – CCP-TP-001, CCP-TP-002, CCP-TP-003, CCP-TP-103, CCP-TP-162	Solids (S3000) Soils/Gravel (S4000) Debris (S5000)	YES	YES
11HC1	Nondestructive Assay Procedure – CCP-TP-063, CCP-TP-064, CCP-TP-103 Description – Canberra Industries High Efficiency Neutron Counter (HENC) mounted in a transportation container	Solids (S3000) Soils/Gravel (S4000) Debris (S5000)	N/A	YES
11HC2	Nondestructive Assay Procedure – CCP-TP-063, CCP-TP-064, CCP-TP-103 Description – Canberra Industries High Efficiency Neutron Counter (HENC) mounted in a trailer	Solids (S3000) Soils/Gravel (S4000) Debris (S5000)	N/A	YES
11SHC1	Nondestructive Assay Procedure – CCP-TP-059, CCP-TP-064, CCP-TP-103 Description – Super High-Efficiency Neutron Counter mounted in a trailer, SWBs	Solids (S3000) Soils/Gravel (S4000) Debris (S5000)	N/A	YES
N/A	WIPP Waste Information System/Waste Data System (WWIS/WDS) Procedure – CCP-TP-030 Description – CH TRU Waste Characterization and WWIS Data Entry	Solids (S3000) Soils/Gravel (S4000) Debris (S5000)	YES	YES

## Processes and Equipment to be Evaluated During Audit A-14-19 of the LANL/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	Transportation Procedure(s) – CCP-TP-054, CCP-TP-055, CCP-TP-086, DOE/WIPP-02-3184, DOE/WIPP-02-3220, DOE/WIPP-02-3183	Solids (S3000) Soils/Gravel (S4000) Debris (S5000)	N/A	N/A
N/A	Quality Assurance Program	Solids (S3000) Soils/Gravel (S4000) Debris (S5000)	N/A	YES