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Carlsbad Field Office  
Carlsbad, New Mexico 88221

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DATE: JUN 26 2014

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REPLY TO  
ATTN OF: CBFO:OQA:MPN:RMS:14-1195:UFC 2300.00

SUBJECT: Certification Audit A-14-29 of the ORNL/CCP VE and MILCC2 NDA Activities

TO: Laura Wilkerson, DOE-OR

NMED  
Hazardous Waste Bureau

Please be advised that an audit team from the Carlsbad Field Office (CBFO) will conduct the Waste Isolation Pilot Plant (WIPP) Hazardous Waste Facility Permit (HWFP) Attachment C6 Audit A-14-29 of the Oak Ridge National Laboratory (ORNL) site and services of the Nuclear Waste Partnership LLC (NWP) Central Characterization Program (CCP), for the certification of contact-handled (CH) transuranic (TRU) waste visual examination (VE) and Mobile ISOCS (in-situ object counting system) Large Container Counter (MILCC2) nondestructive assay (NDA) characterization activities. The audit, which is scheduled for July 29-30, 2014, 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 and provide them access to the ORNL/CCP facilities and appropriate space to conduct meetings. Also, please arrange to have cognizant personnel available to support the audit, as well as provide access to the appropriate documentation and records.

If you have any questions concerning Audit A-14-29, please contact me at (575) 234-7483.

Martin P. Navarrete  
Senior Quality Assurance Specialist

### Attachment

cc: w/attachment

- M. Brown, CBFO \*ED
- J. R. Stroble, CBFO ED
- D. Miehl, CBFO ED
- T. Morgan, CBFO ED
- M. Pinzel, CBFO ED
- N. Castaneda, CBFO ED
- S. Cange, DOE-OR ED
- R. McQuinn, NWP ED
- J. Blankenhorn, NWP ED
- J. Harris, NWP ED
- F. Sharif, NWP/CCP ED
- D.E. Gulbransen, NWP/CCP ED
- V. Cannon, NWP/CCP ED
- A.J. Fisher, NWP/CCP ED
- M. Walker, NWP/CCP ED
- W. Ledford, NWP/CCP ED
- J. Carter, NWP/CCP ED
- T. Peake, EPA ED
- L. Bender, EPA ED

- E. Feltcorn, EPA ED
- R. Joglekar, EPA ED
- S. Ghose, EPA ED
- R. Lee, EPA ED
- J. Kieling, NMED ED
- T. Kliphuis, NMED ED
- S. Holmes, NMED ED
- R. Maestas, NMED ED
- C. Smith, NMED ED
- V. Daub, CTAC ED
- R. Allen, CTAC ED
- P. Martinez, CTAC ED
- B. Pace, CTAC ED
- R. Castillo, CTAC ED
- D. Harvill, CTAC ED
- G. White, CTAC ED
- Site Documents ED
- CBFO QA File
- CBFO M&RC

\*ED denotes electronic distribution



**CARLSBAD FIELD OFFICE  
AUDIT PLAN**

**Audit Number:** A-14-29

**Organization to be Audited:** Oak Ridge National Laboratory (ORNL) Central Characterization Program (CCP)  
Nuclear Waste Partnership LLC (NWP)

**Organizations to be Notified:** NWP/CCP  
U.S. Environmental Protection Agency (EPA)  
New Mexico Environment Department (NMED)

**Date and Location:** July 29 – 30, 2014  
Oak Ridge, TN, and Carlsbad, NM

**Audit Team:**

Martin Navarrete	Management Representative, Carlsbad Field Office (CBFO), Office of Quality Assurance
Dennis Miehl	Quality Assurance Representative, CBFO
Berry Pace	Audit Team Leader, CBFO Technical Assistance Contractor (CTAC)
Porf Martinez	Auditor, CTAC (VE)
Greg Knox	Auditor, CTAC (NDA)
Katie Martin*	Auditor, CTAC (C6 QA)
Rick Castillo	Technical Specialist, CTAC (VE)
James Oliver	Technical Specialist, CTAC (NDA)

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

**Audit Scope:**

The audit team will evaluate the adequacy, implementation, and effectiveness of the technical and quality assurance (QA) activities performed by NWP/CCP at ORNL for characterization and certification of contact-handled (CH) Summary Category Groups (SCGs) S3000 solids, S4000 soils, and S5000 debris waste utilizing the Mobile ISOCS (in-situ object counting system) Large Container Counter (MILCC2) nondestructive assay (NDA) system. The audit team will also evaluate the NWP/CCP visual examination (VE) process for the characterization and certification of CH SCG S5000 debris waste. The audit will be performed at the ORNL site in Oak Ridge, TN, and in the Skeen-Whitlock Building in Carlsbad, NM. A list of the equipment and processes to be evaluated is attached.

**Governing Documents/Requirements:**

Evaluation of the overall program adequacy and effectiveness of ORNL/CCP documents will be based on the current revisions of the following documents:

- *Quality Assurance Program Document, DOE/CBFO-94-1012*
- *Waste Isolation Pilot Plant Hazardous Waste Facility Permit NM4890139088-TSDF*
- *Transuranic Waste Acceptance Criteria for the Waste Isolation Pilot Plant, DOE/WIPP-02-3122*

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

- *CCP Transuranic Waste Characterization Quality Assurance Project Plan, CCP-PO-001*
- *CCP Transuranic Waste Certification Plan, CCP-PO-002*
- Related CCP QA and technical implementing procedures

**Activities to be Audited:**

**General**

- 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**

- Nonconformances
- Personnel Qualification and Training
- Records

**Technical**

- Visual Examination
- Nondestructive Assay
- WIPP Waste Information System/Waste Data System

**Schedule of Audit Activities:**

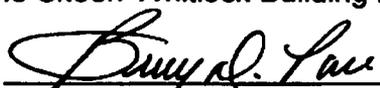
A pre-audit conference is scheduled for Tuesday, July 29, 2014, at 8:30 a.m.

Audit team caucus meetings will be held Tuesday, July 29, at 4:00 p.m. and Wednesday, July 30, 2014, at 2:00 p.m.

If needed, the audit team leader will conduct a management briefing with appropriate ORNL and CCP management Wednesday, July 30, at 8:30 a.m.

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

All meetings will take place at the designated locations at the ORNL in Oak Ridge, TN, and at the Skeen-Whitlock Building in Carlsbad, NM.

Prepared by:   
Berry Pace, CTAC  
Audit Team Leader

Date: 6/19/14

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

Date: 6/24/2014

**Processes and Equipment to be Evaluated During Audit A-14-29 of the ORNL/CCP**

<b>WIPP #</b>	<b>Process/Equipment Description</b>	<b>Applicable to the Following Waste Streams/Groups of Waste Streams</b>	<b>Currently Approved by NMED</b>	<b>Currently Approved by EPA</b>
<b>PROCESSES OR EQUIPMENT TO BE EVALUATED FOR CERTIFICATION</b>				
<b>Contact-Handled (CH) S3000 Solids, S4000 Soils, and S5000 Debris Waste</b>				
N/A	Nondestructive Assay Mobile In-Situ Object Counting System Large Container Counter (MILCC2) Procedures – CCP-TP-076, CCP-TP-077, CCP-TP-139	Solids (S3000) Soils/Gravel (S4000) Debris (S5000)	N/A	NO

<b>WIPP #</b>	<b>Process/Equipment Description</b>	<b>Applicable to the Following Waste Streams/Groups of Waste Streams</b>	<b>Currently Approved by NMED</b>	<b>Currently Approved by EPA</b>
<b>PREVIOUSLY APPROVED PROCESSES OR EQUIPMENT</b>				
<b>Contact-Handled (CH) S4000 Soils Waste and S5000 Debris Waste</b>				
16VE1	Visual Examination (VE) Procedure: CCP-TP-113 Description – CH Characterization performed utilizing Visual Examination (VE) and Acceptable Knowledge (AK)	Soils/Gravel (S4000) Debris (S5000)	NO	YES