



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



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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

NMED
 Hazardous Waste Bureau

Subject: Transmittal of the Audit Plan and Notification of Assigned Auditors for CBFO Recertification Audit A-14-19, LANL/CCP

Dear Mr. Kieling:

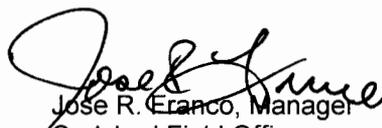
This letter transmits the audit plan for Carlsbad Field Office (CBFO) Recertification Audit A-14-19 of the Los Alamos National Laboratory (LANL) Central Characterization Program (CCP) for transuranic (TRU) waste characterization activities. The audit is required by the Waste Isolation Pilot Plant (WIPP) Hazardous Waste Facility Permit (HWFP). It will be conducted in accordance with the enclosed Audit Plan, and will be held at the LANL facilities in Los Alamos, New Mexico and at the Skeen-Whitlock Building in Carlsbad, New Mexico on August 19-21, 2014. The audit plan identifies the audit team members as required by the HWFP.

Based upon conversations with LANL/CCP personnel, the audit team is planning to observe characterization field activities; however, this may be subject to change due to the Accident Investigation Board's (AIB) ongoing investigation and evaluation.

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-14-19, please contact Mr. Michael R. Brown, Director, CBFO Office of Quality Assurance, at (575) 234-7476.

Sincerely,


 Jose R. Franco, Manager
 Carlsbad Field Office

Enclosure

cc: w/enclosure

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 CBFO QA File
 CBFO M&RC

*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: August 19 – 21, 2014
Los Alamos, New Mexico

Audit Team:

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

• 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) S4000 soils/gravel and SCG S5000 debris wastes, with the exception of waste processed through the Waste Characterization, Reduction and Repackaging Facility. 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 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 is scheduled for Tuesday, August 19, 2014, at 8:30 a.m.

Audit team caucus meetings will be held Tuesday, August 19, 2014, and Wednesday August 20, 2014, at 4:00 p.m., and Thursday, August 21, 2014, at 2:00 p.m.

The audit team will brief appropriate LANL and CCP management on Wednesday, August 20, 2014, and Thursday, August 21, 2014, at 8:30 a.m.

A post-audit conference is scheduled for Thursday, August 21, 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. Pace, Audit Team Leader
CTAC

Date: 7/10/14

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

Date: 7-11-14

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 |
|---|--|---|----------------------------|---------------------------|
| PREVIOUSLY APPROVED PROCESSES OR EQUIPMENT | | | | |
| 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 | 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 | 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 | 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) | 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 |

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 | Acceptable Knowledge Procedure – CCP-TP-005 Description – Acceptable Knowledge (AK) | 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 | 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 | 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 | 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 | 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 | 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 | Soils/Gravel (S4000) Debris (S5000) | N/A | N/A |
| N/A | Quality Assurance Program | Soils/Gravel (S4000) Debris (S5000) | N/A | YES |