



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

 **ENTERED**

RECEIVED

OCT - 1 2014

OCT 14 2014

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 Hazardous Waste Facility Permit Attachment C6 Audit Plan for Recertification Audit A-15-02 of the Savannah River Site Central Characterization Program Transuranic Waste Characterization and Certification Program

Dear Mr. Kieling:

This letter transmits the audit plan for the subject Carlsbad Field Office recertification audit to be conducted at the Skeen-Whitlock Building in Carlsbad, New Mexico, November 4 - 6, 2014, as required by the Waste Isolation Pilot Plant Hazardous Waste Facility Permit. The audit plan identifies the audit team members, as required by the Permit.

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.

Please contact Mr. Michael R. Brown, Quality Assurance Director, at (575) 234-7476, should you have any questions concerning this notification.

Sincerely,


Jose R. Franco, Manager
Carlsbad Field Office

Enclosure



John E. Kieling

-2-

OCT - 1 2014

cc: w/enclosure

D. Bryson, CBFO	*ED
M. Brown, CBFO	ED
J. R. Stroble, CBFO	ED
D. Miehl, CBFO	ED
M. Navarrete, CBFO	ED
G. Basabilvazo, CBFO	ED
S. Holmes, NMED	ED
R. Maestas, NMED	ED
C. Smith, NMED	ED
P. Y. Martinez, CTAC	ED
V. Daub, CTAC	ED
R. Allen, CTAC	ED
P. Martinez, CTAC	ED
B. Pace, CTAC	ED
D. Harvill, CTAC	ED
G. White, CTAC	ED
A. Urquidez, RES	ED

CBFO QA File

CBFO M&RC

*ED denotes electronic distribution

**CARLSBAD FIELD OFFICE SRS/CCP
RECERTIFICATION AUDIT PLAN**

Audit Number: A-15-02

Organization: Savannah River Site (SRS)
Central Characterization Program (CCP)

Organizations to Be Notified: SRS
Nuclear Waste Partnership LLC (NWP)
U.S. Environmental Protection Agency
Defense Nuclear Facilities Safety Board
New Mexico Environment Department

Date and Locations: November 4 – 6, 2014
Carlsbad, NM

Audit Team:

Dennis Miehls	Carlsbad Field Office (CBFO) Quality Assurance Management Representative
Priscilla Y. Martinez	Audit Team Leader, CBFO Technical Assistance Contractor (CTAC)
Tammy Ackman	Auditor, CTAC (C6 QA, Records, NCRs, Training)
Rick Castillo	Auditor, CTAC (QA/NDA/DTC)
Katie Martin	Auditor, CTAC (QA/RTR/VE)
Mike Noland	Auditor, CTAC (QA/AK)
Berry Pace	Auditor, CTAC (Program Status)
Dick Blauvelt	Technical Specialist, CTAC (AK, Waste Certification)
Paul Gomez	Technical Specialist, CTAC (PL/FGA)
Porf Martinez	Technical Specialist, CTAC (RTR/VE)
Jim Oliver	Technical Specialist, CTAC (NDA/DTC/PDP)
Jim Schuetz	Technical Specialist, CTAC (WWIS/WDS)
Greg Knox	Technical Specialist in training, CTAC (RTR)
Judith Stewart	Technical Specialist in training, CTAC (AK)

Audit Scope:

The audit team will evaluate the continued adequacy, implementation, and effectiveness of the SRS/CCP waste characterization processes for remote-handled (RH) Summary Category Group (SCG) S5000 debris waste and contact-handled (CH) SCGs S3000 homogeneous solids, S4000 soils/gravel, and S5000 debris waste. The audit team will also evaluate the SRS/CCP program for meeting both technical and quality assurance (QA) requirements.

Activities to Be Audited:

The following areas from Attachment C6, Section C6-3 of the Waste Isolation Pilot Plant (WIPP) Hazardous Waste Facility Permit will be audited:

Results of Previous Audits
Changes in Programs or Operations
New Programs or Activities Being Implemented
Changes in Key Personnel

QA Elements:

Personnel Qualification and Training
Documents and Records
Nonconformances

Technical Elements:

Acceptable Knowledge (AK), including waste certification (i.e., Waste Stream Profile Forms)
Project-level Data Validation and Verification (PL V&V)
Dose-to-Curie (DTC)
Flammable Gas Analysis (FGA)
Non-destructive Assay (NDA) and participation in Performance Demonstration Program (PDP)
Real-time Radiography (RTR)
Visual Examination (VE)
WIPP Waste Information System/Waste Data System (WWIS/WDS)

For additional details, see Attachment 1 of the processes and equipment to be reviewed during Audit A-15-02 of SRS/CCP.

Governing Documents/Requirements:

Evaluation of adequacy of SRS/CCP documents will be based on the current revisions of the following documents:

- *CBFO 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
- *Remote-Handled TRU Waste Characterization Program Implementation Plan*, DOE/WIPP-02-3214

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 NWP SRS/CCP QA and technical implementing procedures

Schedule of Audit Activities:

A pre-audit conference is scheduled for 8:30 a.m., Tuesday, November 4, 2014, Skeen Whitlock Building, Room T-224.

Audit team caucuses will be held at 4:00 p.m., Tuesday and Wednesday, November 4 and 5, 2014, and at 1:00 p.m. on Thursday, November 6, 2014.

The audit team leader will meet with SRS/CCP management to discuss audit concerns and audit progress at 8:30 a.m. daily, Wednesday and Thursday, November 5 and 6, 2014.

A post-audit conference is scheduled for 2:00 p.m., Thursday, November 6, 2014, Skeen Whitlock Building, Room T-224.

Audit activities will be conducted in Carlsbad, New Mexico.

Approved By: Priscilla Y. Martinez
Priscilla Y. Martinez
CTAC Audit Team Leader

Date: 9-30-14

Approved By: Michael R. Brown
Michael R. Brown, Director
CBFO Quality Assurance Division

Date: 9/30/14

Processes and Equipment To Be Reviewed During Audit A-15-02 of the NWP SRS/CCP

WIPP #	Process/Equipment Description	Applicable to the Following Waste Streams/Groups of Waste Streams	Currently Approved by NMED	Currently Approved by EPA
NEW PROCESSES OR EQUIPMENT				
	N/A			
PREVIOUSLY APPROVED PROCESSES OR EQUIPMENT				
1NABC1	Nondestructive Assay Procedures – CCP-TP-189 and CCP-TP-191 Description – Box Segmented Gamma System (BSGS) and Box Neutron Assay System (BNAS), Five Foot Setback Configuration	Solids (S3000) Soils/Gravel (S4000) Debris (S5000)	N/A	YES
1LCNDE	Real-time Radiography Procedure – CCP-TP-053 and CCP-TP-074 Description – Large Container Non-Destructive Examination (LCNDE) Unit – standard waste boxes (SWBs) and SLB2s	Solids (S3000) Soils/Gravel (S4000) Debris (S5000)	YES	NO
1RR4	Real-time Radiography Procedure – CCP-TP-053 and CCP-TP-145 Description – RTR-4, 55-gallon drums and standard waste boxes (SWBs), Standard large box 2s (SLB2s)	Solids (S3000) Soils/Gravel (S4000) Debris (S5000)	YES	NO
VISUAL	Visual Examination Procedure – CCP-TP-113 and CCP-TP-163 Description – VE QC Check for RTR, VE in lieu of RTR, VET for Retrievably Stored Waste	Solids (S3000) Soils/Gravel (S4000) Debris (S5000)	YES	YES
1RHVE1	Visual Examination Procedures – CCP-TP-163 and CCP-TP-500 Description – Visual Examination of Records for Remote-Handled for Waste Stream SR-RH-SDD.01 only	Debris (S5000)	YES	YES
1DTC1	Dose-to-Curie Procedure – CCP-TP-504 Description – Radiological Characterization	Debris (S5000)	N/A	YES

Processes and Equipment To Be Reviewed During Audit A-15-02 of the NWP SRS/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 (AK)	Solids (S3000) Soils/Gravel (S4000) Debris (S5000)	YES	YES
N/A	Data Generation and Project Level Validation and Verification (V&V)	Solids (S3000) Soils/Gravel (S4000) Debris (S5000)	YES	YES
N/A	WIPP Waste Information System/Waste Data System (WWIS/WDS)	Solids (S3000) Soils/Gravel (S4000) Debris (S5000)	YES	YES
N/A	Quality Assurance Program	Solids (S3000) Soils/Gravel (S4000) Debris (S5000)	N/A	YES