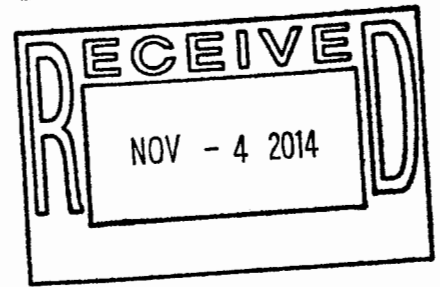




Department of Energy
 Carlsbad Field Office
 P. O. Box 3090
 Carlsbad, New Mexico 88221
 NOV - 4 2014



ENTERED



Mr. John E. Kieling, Chief
 Hazardous Waste Bureau
 New Mexico Environment Department
 2905 Rodeo Park Drive East, Bldg. 1
 Santa Fe, New Mexico 87505-6303

Subject: Transmittal of CBFO Responses to NMED Comments on the Final Audit Report for Recertification Audit A-14-29 of the Oak Ridge National Laboratory Central Characterization Program

Dear Mr. Kieling:

This letter transmits Carlsbad Field Office (CBFO) responses to New Mexico Environment Department (NMED) comments on the Final Audit Report for Recertification Audit A-14-29 of the Oak Ridge National Laboratory Central Characterization Program. CBFO's responses include revisions to the C6-1 Checklist, where appropriate.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with 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, Director, CBFO Quality Assurance Division, at (575) 234-7476 should you have any questions concerning the responses to NMED's comments.

Sincerely,

Jose R. Franco
 Jose R. Franco, Manager
 Carlsbad Field Office

Enclosure

cc: w/Report Narrative
 D. Bryson, CBFO
 M. Brown, CBFO
 J.R. Stroble, CBFO
 G. Basabilvazo, CBFO
 M. Navarrete, CBFO
 D. Miehl, CBFO
 M. Pinzel, CBFO
 N. Castaneda, CBFO
 R. Maestas, NMED
 S. Holmes, NMED
 C. Smith, NMED
 V. Daub, CTAC
 R. Allen, CTAC

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P. Martinez, CTAC
 B. Pace, CTAC
 R. Castillo, CTAC
 D. Harvill, CTAC
 G. White, CTAC
 A. Urquidez, RES
 *ED denotes electronic distribution
 cc: w/enclosure.
 WIPP Operating Record **EF
 CTAC QA File EF
 CBFO M&RC EF
 **EF denotes electronic format



**RESPONSES TO NMED COMMENTS ON THE OAK RIDGE NATIONAL
LABORATORY/CENTRAL CHARACTERIZATION PROGRAM (ORNL/CCP)
FINAL AUDIT REPORT A-14-29**

NMED's review indicated that the body of the Audit Report and the C6 Checklists generally appear to address the applicable elements. NMED provides the following comment for the Permittees' consideration:

1. *Question 30 of the C6 Checklist has no responses in the fields to answer the question.*

Response: Attached is a revised C6-1 Checklist adding responses in the fields for question #30.

REVISED
Table C6-1 Waste Analysis Plan (WAP) Checklist
ORNL/CCP Recertification Audit A-14-29
July 29 – 30, 2014

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Waste Analysis Plan (WAP) General Checklist for use at DOE's Generator/Storage Sites

	WAP Requirement ¹ ORNL/CCP Recertification Audit A-14-29 Table C6-1 Waste Analysis Plan (WAP) Checklist ¹	Procedure Documented		Example of Implementation/Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
WASTE STREAM IDENTIFICATION						
1	Does the generator/storage site define "waste stream" as waste materials that have common physical form, that contain similar hazardous constituents, and that are generated from a single process or activity? (Attachment C Section C-0a)	N/A	N/A	N/A	N/A	Evaluated during A-14-03
2	Are procedures in place to ensure that the generator/storage site assigns one of the Summary Category Groups (S3000-homogeneous solids, S4000-soils/gravel, S5000-debris waste) to each waste stream? (Section C-1b)	N/A	N/A	N/A	N/A	Evaluated during A-14-03
3	Are procedures in place to ensure that the generator/storage site assigns Waste Matrix Code Groups (e.g., solidified inorganics, solidified organics, salt waste, soils, combustible waste, filters, graphite, heterogeneous debris waste, inorganic nonmetal waste, lead/cadmium metal, uncategorized metal) to each waste stream? (Section C-0a)	N/A	N/A	N/A	N/A	Evaluated during A-14-03
4	Are procedures in place to ensure that the generator/storage site assigns a Waste Stream WIPP Identifier (ID) to each waste stream? (Section C3-6b(1))	N/A	N/A	N/A	N/A	Evaluated during A-14-03

	WAP Requirement ¹ ORNL/CCP Recertification Audit A-14-29 Table C6-1 Waste Analysis Plan (WAP) Checklist ¹	Procedure Documented		Example of Implementation/Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
4a	<p>Are procedures in place for generator/storage sites to submit an AK Sufficiency Determination (Determination Request) to the Permittees to meet all or part of the waste characterization requirements including:</p> <ul style="list-style-type: none"> All information specified in Permit Attachment C4, Section C4-3d Identification of relevant hazardous constituents, and correctly identifies all toxicity characteristic and listed hazardous waste numbers All hazardous waste number assignments must be substantiated by supporting data and, if not, whether this lack of substantiation compromises the interpretation Resolution of data discrepancies between different AK sources must be technically correct and documented The AK Summary includes all the identification of waste material parameter weights by percentage of the material in the waste stream, and determinations are technically correct All prohibited items specified in the TSDf-WAC should be addressed, and conclusions drawn are technically adequate and substantiated by supporting information If the AK record includes process control information specified in Permit Attachment C4, Section C4-3b, the information should include procedures, waste manifests, or other documentation demonstrating that the controls were adequate and sufficient. The site must provide the supporting information necessary to substantiate technical conclusions within the Determination Request, and this information must be correctly interpreted. <p>(Section C-0b, Section C4-3d)</p>	N/A	N/A	N/A	N/A	Evaluated during A-14-03
4b	<p>If a generator/storage site does not submit a Determination Request or if the Determination Request is not approved, are procedures in place for the generator/storage site to perform radiography or VE on 100% of the containers in a waste stream as specified in Permit Attachment C1?</p> <p>(Section C-0b)</p>	N/A	N/A	N/A	N/A	Evaluated during A-14-03

	WAP Requirement ¹ ORNL/CCP Recertification Audit A-14-29 Table C6-1 Waste Analysis Plan (WAP) Checklist ¹	Procedure Documented		Example of Implementation/Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
4c	Are procedures in place to ensure that the generator/storage sites complete a Waste Stream Profile Form (WSPF) and Characterization Information Summary (CIS) as specified in Permit Attachment C3, Sections C3-6b(1) and C3-6b(2)? (Section C-0c)	N/A	N/A	N/A	N/A	Evaluated during A-14-03
6	Are procedures in place to ensure that the generator/storage site assigns EPA hazardous waste numbers associated with the waste? If so, do these assigned EPA hazardous waste numbers correspond to the permitted EPA hazardous waste numbers in Table C-5? Are there any assigned EPA hazardous waste numbers that are not permitted EPA hazardous waste numbers on the Table C-5? If so, did the generator/storage site reject the waste for shipment to and disposal at WIPP? Did the generator assign a state hazardous waste codes or numbers? If so, is it assigned to waste that is permitted at WIPP? (Section C-1b)	N/A	N/A	N/A	N/A	Evaluated during A-14-03
Z	Are procedures in place to ensure that Summary Category Groups are defined as follows: S3000- Homogeneous solids are solid material, inorganic process residues, inorganic sludges, salt waste, and pyrochemical salt waste excluding soils, that do not meet NMED criteria for classification as debris and are at least 50 percent by volume homogeneous solids or comprise the majority of the waste stream S4000- Waste streams that are at least 50 percent by volume soil/gravel, or comprise the majority of the waste stream S5000- Waste streams that are at least 50 percent volume materials that meet the NMED criteria for debris, or comprise the majority matrix of materials. The criteria for debris are solid materials intended for disposal that exceed 2.36 inch particle size and is a manufactured object, plant or animal matter, or natural geologic material. Particles smaller than 2.36 inches in size may be considered debris if the debris is a manufactured object and if it is not a particle of S3000 or S4000 material. (Section C-0a)	N/A	N/A	N/A	N/A	Evaluated during A-14-03

	WAP Requirement ¹ ORNL/CCP Recertification Audit A-14-29 Table C6-1 Waste Analysis Plan (WAP) Checklist ¹	Procedure Documented		Example of Implementation/Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
8	<p>Does the generator/storage facility have procedures in place to ensure that the following waste characterization parameters will be obtained:</p> <ul style="list-style-type: none"> Determination whether TRU mixed waste streams comply with the applicable provisions of the TSDF-WAC Determination whether TRU mixed wastes exhibit a hazardous characteristic per 20.4.1.200 NMAC (incorporating 40 CFR 261 Subpart C) Determination whether TRU mixed wastes are listed per 20.4.1.200 NMAC (incorporating 40 CFR 261 Subpart D) Estimation of waste material parameter weights <p>(Section C-2)</p>	N/A	N/A	N/A	N/A	Evaluated during A-14-03
9	<p>Are procedures in place to ensure that waste streams identified to contain incompatible materials or materials incompatible with waste containers cannot be shipped unless treated to remove the incompatibility?</p> <p>(Section C-1c)</p>	N/A	N/A	N/A	N/A	Evaluated during A-14-03
10	<p>Are procedures in place to ensure that the generator/storage site uses acceptable knowledge and, as necessary, radiography and visual examination analysis as specified in Table C-17</p> <p>(Section C-3)</p>	N/A	N/A	N/A	N/A	Evaluated during A-14-03
UNACCEPTABLE WASTE						
12	<p>Are procedures in place to ensure that the generator/storage site ensures, through administrative and operational procedures and characterization techniques, that waste containers do not include the following unacceptable waste:</p> <ul style="list-style-type: none"> liquid waste is not acceptable at WIPP. Liquid in the quantities delineated below is acceptable <ul style="list-style-type: none"> Observable liquid shall be no more than 1 percent by volume of the outermost container at the time of radiography or visual examination Internal containers with more than 60 milliliters or 3 percent by volume observable liquid, whichever is greater, are prohibited Containers with Hazardous Waste number U134 assigned shall have no observable liquid Overpacking the outermost container that was examined during radiography or visual examination or redistributing untreated liquid within the container shall not be used to meet the liquid volume limits 	N/A	N/A	N/A	N/A	Evaluated during A-14-03

	WAP Requirement ¹ ORNL/CCP Recertification Audit A-14-29 Table C6-1 Waste Analysis Plan (WAP) Checklist ¹	Procedure Documented		Example of Implementation/Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
	<ul style="list-style-type: none"> non-radionuclide pyrophoric materials hazardous wastes not occurring as co-contaminants with TRU wastes (non-mixed hazardous wastes) wastes incompatible with backfill, seal and panel closures materials, container and packaging materials, shipping container materials, or other wastes wastes containing explosives or compressed gases (continued below) 					
12a	<ul style="list-style-type: none"> wastes with polychlorinated biphenyls (PCBs) not authorized under an EPA PCB waste disposal authorization wastes exhibiting the characteristic of ignitability, corrosivity, or reactivity (EPA Hazardous Waste Numbers of D001, D002, or D003) waste that has ever been managed as high-level waste and waste from tanks specified in Table C-4, unless specifically approved through a Class 3 permit modification any waste container from a waste stream (or waste stream lot) which has not undergone either radiographic or visual examination of a statistically representative subpopulation of the wastes stream in each shipment pursuant to Permit Attachment C7 any waste container from a waste stream which has not been preceded by an appropriate, certified Waste Stream Profile Form (see Section C-1d) (Section C-1c)	N/A	N/A	N/A	N/A	Evaluated during A-14-03
WASTE ACCEPTANCE CONTROL						
14	Are procedures in place to ensure that the generator/storage site uses a Waste Stream Profile Form (WSPF) which includes, at a minimum, the information indicated on the attached WSPF found in Figure C-1 and a Characterization Information Summary (CIS) prior to waste disposal at the WIPP? (Section C-1d)	N/A	N/A	N/A	N/A	Evaluated during A-14-03
16	Are procedures in place to ensure that additional WSPFs are provided to WIPP and NMED for waste streams or portions of waste streams that are reclassified based upon waste characterization information? (Section C-1d)	N/A	N/A	N/A	N/A	Evaluated during A-14-03
16a	Are criteria in place to determine the specific circumstances under which a WSPF is revised versus when a new WSPF is required? (Section C-1d)	N/A	N/A	N/A	N/A	Evaluated during A-14-03

	WAP Requirement ¹ ORNL/CCP Recertification Audit A-14-29 Table C6-1 Waste Analysis Plan (WAP) Checklist ¹	Procedure Documented		Example of Implementation/Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
GENERAL CHARACTERIZATION REQUIREMENTS						
25	Are procedures in place to ensure that Acceptable Knowledge is used in waste characterization activities to delineate TRU mixed waste streams, to assess whether TRU mixed wastes comply with the TSDF-WAC, to assess whether TRU mixed waste exhibits a hazardous characteristic (20.4.1.200 NMAC, incorporating 40 CFR 261 Subpart C), and to assess whether TRU wastes are listed (20.4.1.200 NMAC, incorporating 40 CFR 261 Subpart D), and to estimate waste material parameter weights? (Section C-3a)	N/A	N/A	N/A	N/A	Evaluated during A-14-03
26	Are procedures in place to ensure that radiography and/or visual examination are used as necessary to: <ul style="list-style-type: none"> • Examine a waste container to determine the physical form • Identify observable liquid in excess of TSDF-WAC limits and containerized gases • Verify the physical form matches the waste stream description (Section C-3b)	CCP-TP-113 S. 1.0, Table 1 & Att. 1 & 2	Y	BDRs: ORNLCHVE0101 ORNLCHVE0102 ORNLCHVE0103 ORNLCHVE0104 ORNLCHVE0108 ORNLCHVE0109 ORNLCHVE0110 (VE-1)	Y	
28	Are procedures in place to ensure that the following characterization activities shall occur: <ul style="list-style-type: none"> • Acceptable Knowledge for all wastes, with testing as necessary to augment AK including; <ul style="list-style-type: none"> - Visual examination or radiography for all waste containers 	N/A	N/A	N/A	N/A	Evaluated during A-14-03

	WAP Requirement ¹ ORNL/CCP Recertification Audit A-14-29 Table C6-1 Waste Analysis Plan (WAP) Checklist ¹	Procedure Documented		Example of Implementation/Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
DATA GENERATION, VERIFICATION, VALIDATION, DOCUMENTATION, AND QUALITY ASSURANCE						
30	<p>Are procedures in place to ensure that the following Data Quality Objectives are met:</p> <ul style="list-style-type: none"> Use Acceptable Knowledge to delineate TRU mixed waste streams, assess whether TRU mixed wastes comply with the applicable requirements of the TSDF-WAC, assess whether TRU mixed wastes exhibit a hazardous characteristic, assess whether TRU mixed wastes are listed and to estimate waste material parameter weights Use radiography or visual examination to verify the physical form of the waste matches its waste stream description as determined by AK and to verify the absence of prohibited items <p>(Section C-4a(1))</p>	N/A	N/A	N/A	N/A	<u>Evaluated during A-14-03</u>
31	<p>Are procedures in place to ensure that the following Quality Assurance Objectives are adequately defined and assessed for each characterization method:</p> <ul style="list-style-type: none"> Precision as a measure of the mutual agreement among multiple measurements. Accuracy as the degree of agreement between a measurement result and a true or known value. Completeness is a measure of the amount of valid data obtained from a method compared to the total amount of data obtained that is expressed as a percentage. Comparability is the degree to which one data set can be compared to another data set. Representativeness as an expression of the degree to which data represent characteristics of a population. <p>(Section C-4a(2))</p>	CCP-TP-113 Att. 3	Y	BDRs ORNLCHVE0101 ORNLCHVE0102 ORNLCHVE0103 ORNLCHVE0104 ORNLCHVE0108 ORNLCHVE0109 ORNLCHVE0110 (VE-1)	Y	
32	<p>With respect to data generation, are procedures in place to ensure that the generator/storage site's waste characterization program meets the following general requirements:</p> <ul style="list-style-type: none"> Testing data packages and batch data reports must be reported accurately in a pre-approved format, must be maintained in permanent files, and must be traceable? All data must receive a technical review by another qualified operator? <p>(Section C3-4a)</p>	CCP-TP-113 S. 5.0 & Att. 1 & 2	Y	BDRs ORNLCHVE0101 ORNLCHVE0102 ORNLCHVE0103 ORNLCHVE0104 ORNLCHVE0108 ORNLCHVE0109 ORNLCHVE0110 (VE-1)	Y	

	WAP Requirement ¹ ORNL/CCP Recertification Audit A-14-29 Table C6-1 Waste Analysis Plan (WAP) Checklist ¹	Procedure Documented		Example of Implementation/Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
33	Are procedures in place to ensure that the generator/storage site performs validation of waste characterization data for each waste container? (Section C-4)	CCP-TP-113, S. 4.7 & Att. 3	Y	BDRs ORNLCHVE0101 ORNLCHVE0102 ORNLCHVE0103 ORNLCHVE0104 ORNLCHVE0108 ORNLCHVE0109 ORNLCHVE0110 (VE-1)	Y	
34	Are procedures in place to ensure that the generator/storage site has a pre-approved format for reporting waste characterization data? (Section C-4a(3))	CCP-TP-113 Att. 1 & 2	Y	BDRs ORNLCHVE0101 ORNLCHVE0102 ORNLCHVE0103 ORNLCHVE0104 ORNLCHVE0108 ORNLCHVE0109 ORNLCHVE0110 (VE-1)	Y	
35	Are procedures in place to ensure that the generator/storage site prepares testing batch data reports to meet the requirements of their own site-specific QAP/P and/or SOPs? (Section C-4a(3))	CCP-TP-113 S. 4.6	Y	BDRs ORNLCHVE0101 ORNLCHVE0102 ORNLCHVE0103 ORNLCHVE0104 ORNLCHVE0108 ORNLCHVE0109 ORNLCHVE0110 (VE-1)	Y	

	WAP Requirement ¹ ORNL/CCP Recertification Audit A-14-29 Table C6-1 Waste Analysis Plan (WAP) Checklist ¹	Procedure Documented		Example of Implementation/Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
36	<p>Are procedures in place to ensure that all raw data is collected and managed at the data generation level in accordance with the following criteria:</p> <ul style="list-style-type: none"> All raw data shall be signed and dated in reproducible ink by the individual collecting the data, or signed and dated using electronic signatures All data shall be recorded clearly, legibly, and accurately in field records All changes to original data shall be lined out, initialed, and dated by the individual making the change. Original data may not be obliterated or otherwise be made unreadable All data shall be transferred and reduced from field records completely and accurately All field records shall be maintained as specified in Table C-2 of Attachment C Data shall be organized into standard reporting formats for reporting purposes All electronic and video data must be stored to ensure that waste container and QC data are readily retrievable <p>(Section C3-4a)</p>	CCP-TP-113 S. 5.0 & Att. 3	Y	BDRs ORNLCHVE0101 ORNLCHVE0102 ORNLCHVE0103 ORNLCHVE0104 ORNLCHVE0108 ORNLCHVE0109 ORNLCHVE0110 (VE-1)	Y	
37	<p>Are procedures in place to ensure that 100 % of batch data reports are subject to independent technical review by an individual qualified to review the data who was not involved in the generation or recording of the data under review. The reviewer shall release the data through signature with an associated review checklist prior to characterization of the associated waste and shipment to the WIPP. The review shall ensure the following, as applicable:</p> <ul style="list-style-type: none"> Data generation and reduction were conducted according to the methods used and reported in the proper units and significant figures Calculations have been verified by a valid calculation program, a spot check of verified calculation programs, and/or a 100 percent check of all hand calculations The data have been reviewed for transcription errors The testing QA documentation for BDRs is complete and includes, as applicable, raw data, calculation records, calibration records Radiography tapes are reviewed on a waste container basis at a minimum of once per testing batch or once per day of operation, whichever is less frequent. The radiography tape will be reviewed against the data on the radiography form to ensure that data are complete and correct QAOs have been met <p>(Section C3-4a(1))</p>	CCP-TP-113 S. 4.7 & Att. 3	Y	BDRs ORNLCHVE0101 ORNLCHVE0102 ORNLCHVE0103 ORNLCHVE0104 ORNLCHVE0108 ORNLCHVE0109 ORNLCHVE0110 (VE-1)	Y	

	WAP Requirement ¹ ORNL/CCP Recertification Audit A-14-29 Table C6-1 Waste Analysis Plan (WAP) Checklist ¹	Procedure Documented		Example of Implementation/Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
40	<p>Are procedures in place to ensure that 100 percent of all batch data reports receive a Site Project Manager signature release with an associated review checklist prior to characterization of the associated waste and shipment to the WIPP. This release shall ensure the following:</p> <ul style="list-style-type: none"> • Testing batch QC checks were properly performed. Radiography data are complete and acceptable based on evidence of videotape review of one waste container per day or once per testing batch, whichever is less frequent • Data generation level independent technical review, validation, and verification have been performed as evidenced by the completed review checklists and appropriate signature releases. • Independent technical reviewers were not involved in the generation or recording of the data under review. • Batch Data review checklists are complete • Batch Data Reports are complete and data properly reported • Verify that data are within established data assessment criteria and meet all applicable QAOs <p>(Section C3-4b(1))</p>	N/A	N/A	N/A	N/A	Evaluated during A-14-03
42	<p>Are procedures in place to ensure that a repeat of the data review process at the data generation level will be performed on a minimum of one randomly chosen waste container every quarter to determine if the verification and validation is performed according to documented procedures?</p> <p>(Section C3-4b)</p>	N/A	N/A	N/A	N/A	Evaluated during A-14-03
43	<p>Are procedures in place and checklists are available to prepare a Site Project Manager (SPM) Summary and a Data Validation Summary (the summaries may be in the same document)? The SPM Summary includes a validation checklist for each batch that is of sufficient detail to document all aspects of a batch data report that could affect data quality. The Data Validation Summary must identify each Batch Data Report reviewed, describe how the validation was performed, identify all problems, and identify all acceptable and unacceptable data. Summaries must include release signatures.</p> <p>(Section C3-4b(2))</p>	N/A	N/A	N/A	N/A	Evaluated during A-14-03
44	<p>Are procedures in place to ensure that non-administrative, WAP-related nonconformances first identified at the site project manager level are reported to the Permittees within seven calendar days of identification, that nonconformance reports are prepared within 30 calendar days, and that corrective action is implemented prior to waste shipment?</p>	CCP-QP-005, S. 4.4.1 [D.3 & D.4] & Att. 4	Y	N/A	N/A	There were no reportable CH VE NCRs since the previous recertification audit.

	WAP Requirement ¹ ORNL/CCP Recertification Audit A-14-29 Table C6-1 Waste Analysis Plan (WAP) Checklist ¹	Procedure Documented		Example of Implementation/Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
	(Section C3-7)					
45	Are procedures in place to ensure that any waste container for which a nonconformance report (NCR) has been written will not be shipped to the WIPP facility unless the condition that led to the NCR for that container is appropriately identified, reconciled, corrected, and documented? Are nonconformance reports prepared for nonconformances identified? Are nonconformances identified and tracked, and does the Site Project Manager oversee the nonconformance report process? (Section C3-7)	CCP-QP-005, (All)	Y	NCRs evaluated (none of these were reportable): NCR-ORNL-0702-14, R.0 NCR-ORNL-0162-14, R.0 NCR-ORNL-0159-14, R.0 (GEN-1) Contact-Handled (CH) Visual Examination (VE) NCR Log (GEN-2)	Y	
DATA TRANSMITTAL						
48	Are procedures in place to ensure that the generator/storage site transmits data by hard copy or electronic copy from the data generation level to the site project level? If electronic, does the generator/site have a hard copy available on demand? (Section C-4a(5))	N/A	N/A	N/A	N/A	Evaluated during A-14-03
50	Are procedures in place to ensure that the generator/storage site inputs the data into the WWIS manually or electronically? (Section C-4a(5))	N/A	N/A	N/A	N/A	Evaluated during A-14-03
51	Are procedures in place to ensure that the generator/storage site enters the data into the WWIS in the exact format required by the database? (Section C-4a(5))	N/A	N/A	N/A	N/A	Evaluated during A-14-03
52	Are procedures in place to ensure all of the data presented on Table C-3 of the Permit is transmitted to the WWIS? (Table C-3)	N/A	N/A	N/A	N/A	Evaluated during A-14-03
RECORDS AND RECORD MANAGEMENT						
55	Are procedures in place to ensure that the generator/storage site's hard copy and/or electronic data reports follow the Permittees' format requirements? (Section C-4a(3))	N/A	N/A	N/A	N/A	Evaluated during A-14-03
56	Are procedures in place to ensure that hard copy or electronic Waste Stream Profile Form will include the following: <ul style="list-style-type: none">• Generator/storage site name	N/A	N/A	N/A	N/A	Evaluated during A-14-03

	WAP Requirement ¹ ORNL/CCP Recertification Audit A-14-29 Table C6-1 Waste Analysis Plan (WAP) Checklist ¹	Procedure Documented		Example of Implementation/Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
	<ul style="list-style-type: none"> Generator/storage site EPA ID Date of audit report approval by NMED (if obtained) Original generator of waste stream Whether waste is Contact-Handled or Remote-Handled Waste Stream WIPP Identification Number Summary Category Group Waste Matrix Code Group Waste Material Parameter Weight Estimates per unit of waste Waste stream name A description of the waste stream Applicable EPA hazardous waste codes numbers Applicable TRUCON codes A listing of acceptable knowledge documentation used to identify the waste stream The waste characterization procedures used and the reference and date of the procedure Certification signature of Site Project Manager, name, title, and date signed (Section C3-6b(1))					
58a	Are procedures in place to ensure that hard copy or electronic Characterization Information Summary will include the following: <ul style="list-style-type: none"> Data reconciliation with DQOs Radiography and visual examination summary to document that all prohibited items are absent in the waste and to verify that the physical form of the waste matches its waste stream description as determined by AK (if applicable) A complete listing of all container identification numbers used to generate the Waste Stream Profile Form, cross-referenced to each Batch Data Report Complete AK summary, including stream name and number, point of generation, waste stream volume (current and projected), generation dates, TRUCON codes, Summary Category Group, Waste Matrix Code(s) and Waste Matrix Code Group, other TWBIR information, waste stream description, areas of operation, generating processes, RCRA determinations, radionuclide information, all references used to generate the AK summary, and any other information required by Permit Attachment 	N/A	N/A	N/A	N/A	Evaluated during A-14-03

	WAP Requirement ¹ ORNL/CCP Recertification Audit A-14-29 Table C6-1 Waste Analysis Plan (WAP) Checklist ¹	Procedure Documented		Example of Implementation/Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
	C4, Section C4-2b. <ul style="list-style-type: none"> Method for determining Waste Material Parameter Weights per unit of waste. List of any AK Sufficiency Determinations requested for the waste stream Certification through acceptable knowledge or testing that any waste assigned the hazardous waste number of U134 (hydrofluoric acid) no longer exhibits the characteristic of corrosivity. This is verified by ensuring that no liquid is present in U134 waste. A justification for the selection of radiography and/or VE as an appropriate method of characterizing the waste. (Section C3-6b(2))					
<u>56b</u>	Are procedures in place to assure that ongoing container characterization results are cross referenced to Batch Data Reports? (Section C3-6b)	N/A	N/A	N/A	N/A	Evaluated during A-14-03
<u>58</u>	Are procedures in place to ensure that project level reports are compiled into Characterization Information Summaries? (Section C3-6b)	N/A	N/A	N/A	N/A	Evaluated during A-14-03
<u>59</u>	Are procedures in place to ensure that the generator/storage site uses forms for data reporting that are pre-approved forms in site-specific documentation? (Section C3-6)	CCP-TP-113 Att. 1, 2, & 3	Y	BDRs ORNLCHVE0101 ORNLCHVE0102 ORNLCHVE0103 ORNLCHVE0104 ORNLCHVE0108 ORNLCHVE0109 ORNLCHVE0110 VE-1	Y	
<u>60</u>	Are procedures in place to ensure that the generator/storage site's site project manager submits to the WIPP facility a summary of the waste stream information and reconciliation with data quality objectives (DQOs) once a waste stream is characterized? (Section C-4a(5))	N/A	N/A	N/A	N/A	Evaluated during A-14-03
<u>61</u>	Are procedures in place to ensure that the generator/storage site project office completes a WSPF based on the Batch Data Reports? (C3-6b)	N/A	N/A	N/A	N/A	Evaluated during A-14-03
<u>62</u>	Are procedures in place to ensure that the generator/storage Site Project Manager submits the WSPF to the Permittees for DOE's approval along with the	N/A	N/A	N/A	N/A	Evaluated during A-14-03

	WAP Requirement ¹ ORNL/CCP Recertification Audit A-14-29 Table C6-1 Waste Analysis Plan (WAP) Checklist ¹	Procedure Documented		Example of Implementation/Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
	accompanying Characterization Information Summary for that waste stream? (Section C-4a(5))					
63	Are procedures in place to ensure that the generator/storage site maintains records related to waste characterization testing activities in the testing facility files, or site project files for those facilities located on-site? (Section C-4a(6))	CCP-QP-008, (All) CCP-QP-028, (All)	Y	CH Records Inventory and Disposition Schedule (RIDS) dated 08/01/2013 (GEN-3)	Y	
64	Are procedures in place to ensure that the appropriate documented training and indoctrination is performed for all individuals and that procedures are documented in site specific QAPjPs and procedures? (Section C3-8)	CCP-PO-001, (All) CCP-QP-002, S. 4.0	Y	Qualification records for selected CCP personnel (GEN-4) CCP – ORNL List of Qualified Individuals dated 07/24/2014 (GEN-5)	Y	
66	Are procedures in place to ensure that the generator/storage site has an appropriate records inventory and disposition schedule (RIDS) or equivalent that was prepared and approved by appropriate site personnel? (Section C-4a(6))	CCP-QP-008, S. 3.1.2 CCP-QP-028, S. 3.1.1	Y	CH Records Inventory and Disposition Schedule (RIDS) dated 08/01/2013 (GEN-3)	Y	
67	Are procedures in place to ensure that the generator/storage site maintains all records relevant to an enforcement action, regardless of disposition, until they are no longer needed for enforcement action, and then dispositioned per the approved RIDS? (Section C-4a(6))	CCP-QP-008, S. 4.15.1 (NOTE) CCP-QP-028, (All)	Y	CH Records Inventory and Disposition Schedule (RIDS) dated 08/01/2013 (GEN-3)	Y	
68	Are procedures in place to ensure that the generator/storage site maintains records that are designated as Lifetime Records for the life of the waste characterization program plus six years or that the records have been transferred to the WIPP Records Archive facility? Lifetime Records include: <ul style="list-style-type: none"> • Test facility Batch Data Reports, • Waste Stream Characterization Package, • Data reduction, validation, and reporting documentation, • Acceptable knowledge documentation, • WSPF and Characterization Information Summary (Section C-4a(6), Table C-2)	CCP-PO-001, S. C-4a(6) TABLE C-2 CCP-QP-008, S. 2.3.11 & 4.10.1 (2 nd NOTE) CCP-QP-028, (All)	Y	CH Records Inventory and Disposition Schedule (RIDS) dated 08/01/2013 (GEN-3)	Y	
69	Are procedures in place to ensure that the generator/storage site maintains records that are designated as Non-Permanent Records for ten years from the date of	CCP-PO-001, S. C-4a(6),	Y	CH Records Inventory and Disposition Schedule	Y	

	WAP Requirement ¹ ORNL/CCP Recertification Audit A-14-29 Table C6-1 Waste Analysis Plan (WAP) Checklist ¹	Procedure Documented		Example of Implementation/Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
	<p>record generation, and then dispositioned according per the approved RIDS or transferred to the WIPP Records Archive facility?</p> <p>Non-Permanent Records include:</p> <ul style="list-style-type: none"> • Nonconformance documentation, • Variance documentation, • Assessment documentation, • Calculations and related software documentation, • Training/qualification documentation, • QAP/P documentation (all revisions), • Calibration documentation, • Procurement documentation, • QA procedures (all revisions), • Technical implementing procedures (all revisions), and • Audio/video recording (radiography, visual, etc.). <p>(Section C-4a(6), Table C-2)</p>	<p>TABLE C-2</p> <p>CCP-QP-008, S. 2.3.17 & 4.10.1 (2nd NOTE)</p> <p>CCP-QP-028, (All)</p>		<p>(RIDS) dated 08/01/2013 (GEN-3)</p>		
Z0	<p>Are procedures in place to ensure that the generator/storage site has raw data that is identifiable and legible, and provides documentary evidence of quality? (Section C-4a(6))</p>	<p>CCP-TP-113 Att. 1, 2 & 3</p>	<p>Y</p>	<p>BDRs ORNLCHVE0101 ORNLCHVE0102 ORNLCHVE0103 ORNLCHVE0104 ORNLCHVE0108 ORNLCHVE0109 ORNLCHVE0110 (VE-1)</p>	<p>Y</p>	
Z1	<p>Are procedures in place to ensure that if the generator/storage site ceases to operate, that all records be transferred before closeout? (Section C-4a(6))</p>	<p>CCP-QP-008, S. 4.10.2</p>	<p>Y</p>	<p>N/A</p>	<p>N/A</p>	<p>This site has not ceased operations.</p>
SHIPMENT						
Z2	<p>Are procedures in place to ensure that the generator/storage site accurately completes an EPA Hazardous Waste Manifest prior to shipping the waste to WIPP that contains the following information:</p> <ul style="list-style-type: none"> • Generator/storage site name and EPA ID • Generator/storage site contact name and phone number • Quantity of waste • List of up to six state and/or federal hazardous waste numbers in each line 	<p>N/A</p>	<p>N/A</p>	<p>N/A</p>	<p>N/A</p>	<p>Evaluated during A-14-03</p>

	WAP Requirement ¹ ORNL/CCP Recertification Audit A-14-29 Table C6-1 Waste Analysis Plan (WAP) Checklist ¹	Procedure Documented		Example of Implementation/Objective Evidence, as applicable		Comment (e.g., any change in procedure since last audit, etc.)
		Location	Adequate? Y/N (Why?)	Item Reviewed	Adequate? Y/N	
	item <ul style="list-style-type: none"> • Listing of all container IDS • Signature of authorized generator representative (Section C-5b)					
73	Are procedures in place to ensure that the generator/storage site accurately completes the following container specific information: <ul style="list-style-type: none"> • Waste stream identification number • List of hazardous waste numbers per container • Certification data • Shipping data (Section C-5b)	N/A	N/A	N/A	N/A	Evaluated during A-14-03

1. The WAP requirements should be presented in documents, such as procedures. Each of the questions posed under WAP requirements is meant to ask whether procedures are in place or whether documents are evident which demonstrate that the specific WAP requirement is or can be met.