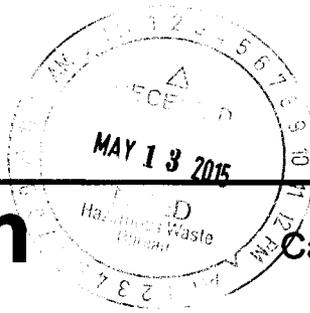


United States Government



Department of Energy

memorandumCarlsbad Field Office
Carlsbad, New Mexico 88221**DATE: MAY 13 2015****REPLY TO
ATTN OF: CBFO:QAD:DSM:SG:15-0741:UFC 2300.00****SUBJECT: Recertification Audit A-15-18, INL/CCP Transuranic Waste Characterization Activities****TO: Benjamine B. Roberts, DOE-ID**

Please be advised that a team of auditors and technical specialists from the Carlsbad Field Office (CBFO) will conduct Audit A-15-18 at the Idaho National Laboratory/Central Characterization Program (INL/CCP) facilities near Idaho Falls, ID and at the Skeen-Whitlock Building in Carlsbad, NM June 16 – 18, 2015. The audit will be conducted in accordance with the attached audit plan.

The purpose of the audit is to determine whether INL/CCP transuranic waste characterization activities should be recertified by CBFO for waste destined for disposal at the Waste Isolation Pilot Plant. Representatives from CBFO, the New Mexico Environment Department, and U.S. Department of Energy Headquarters may be present to observe the audit process. Representatives from the U.S. Environmental Protection Agency may also be present to conduct an independent inspection.

Your representatives are requested to coordinate with the audit team to provide access to INL/CCP facilities and the necessary documentation and records for the audit team to conduct the audit. Please ensure availability of appropriate space to conduct the pre-audit and post-audit conferences and also work spaces for the audit team as well as for observers and inspectors, if present.

If you have any questions or comments concerning this audit, please contact me at (575) 234-7491.

Dennis S. Miehl
Senior Quality Assurance Specialist

Attachment

150524



cc: w/attachment
M. Brown, CBFO *ED
J.R. Stroble, CBFO ED
M. Navarrete, CBFO ED
G. Birge, CBFO ED
S. Ross, EM-43 ED
J. Zimmerman, DOE-ID ED
J. Wells, DOE-ID ED
P. Breidenbach, NWP ED
J. Blankenhorn, NWP ED
J. Harris, NWP ED
V. Cannon, NWP ED
F. Sharif, NWP/CCP ED
D.E. Gulbransen, NWP/CCP ED
A.J. Fisher, NWP/CCP ED
I. Joo, 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
J. Kieling, NMED ED
R. Maestas, NMED ED
S. Holmes, NMED ED
C. Smith, NMED ED
V. Daub, CTAC ED
R. Allen, CTAC ED
P. Martinez, CTAC ED
B. Pace, CTAC ED
T. Ackman, CTAC ED
D. Harvill, CTAC ED
G. White, CTAC ED

CBFO QA File

CBFO M&RC

*ED denotes electronic distribution

CARLSBAD FIELD OFFICE AUDIT PLAN

Audit Number: A-15-18

Organization to be Audited: Idaho National Laboratory
Central Characterization Program (INL/CCP)

Organizations to be Notified: U.S. Department of Energy – Idaho Falls (DOE-ID)
U.S. Environmental Protection Agency (EPA)
Nuclear Waste Partnership LLC (NWP)
New Mexico Environment Department (NMED)

Date and June 16 – 18, 2015

Location: Idaho Falls, ID, and Carlsbad, NM

Audit Team:

| | |
|----------------|---|
| Dennis Miehls | Carlsbad Field Office (CBFO) Management Representative |
| Tamara Ackman | Audit Team Leader, CBFO Technical Assistance Contractor (CTAC) |
| Berry Pace | Auditor, CTAC (Program Status) |
| Jim Schuetz* | Auditor, CTAC (C6 QA) |
| Bob Prentiss* | Auditor, CTAC (C6 QA) |
| Katie Martin | Auditor, CTAC (VE) |
| Roger Vawter | Auditor, CTAC (NDA and DTC) |
| Charlie Riggs | Auditor, CTAC (AK) |
| Kathy Hood | Auditor-in-Training, CTAC (VE) |
| Greg Knox | Auditor/Technical Specialist, CTAC (RTR) |
| B.J. Verret | Auditor/Technical Specialist, CTAC (GGT, FGA, and Container Management) |
| Porf Martinez | Technical Specialist, CTAC (VE) |
| Rhett Bradford | Technical Specialist, CTAC (RTR) |
| Paul Gomez | Technical Specialist, CTAC (PL V&V) |
| Dick Blauvelt | Technical Specialist, CTAC (AK) |
| Jim Oliver | Technical Specialist, CTAC (NDA and DTC) |
| Michel Hall | Technical Specialist, CTAC (NDA and DTC) |
| Judith Stewart | Technical Specialist-in-Training, CTAC (AK) |

*Personnel auditing in Carlsbad, NM

Audit Scope:

The audit team will evaluate the continued adequacy, implementation, and effectiveness of INL/CCP transuranic waste activities as they relate to the Waste Isolation Pilot Plant (WIPP) Hazardous Waste Facility Permit for characterization and certification of contact-handled Summary Category Groups (SCGs) S3000

homogeneous solids, S4000 soils/gravel, S5000 debris waste, and remote-handled SCGs S3000 homogeneous solids and S5000 debris waste. The specific items to be audited are listed under Activities to be Audited.

Activities to be Audited:

General

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

Quality Assurance Activities in Carlsbad, NM

The following quality assurance (QA) elements will be evaluated for compliance with the Permit, utilizing checklists C6-1 and C6-2.

- Personnel Qualification and Training
- Records
- Quality Improvement/Nonconformances
- WIPP Waste Information System/Waste Data System (WWIS/WDS)

Technical Elements in Idaho Falls, ID

The following technical elements will be evaluated for compliance with the Permit, utilizing checklists C6-1 through C6-4 and/or procedural checklists, as applicable.

- Acceptable Knowledge (AK)
- Waste Certification (e.g., Waste Stream Profile Forms)
- Project-level Data Validation and Verification (PL V&V)
- Real-time Radiography (RTR)
- Visual Examination (VE)
- Sample Control
- Nondestructive Assay (NDA)
- Dose-to-Curie (DTC)
- Flammable Gas Analysis (FGA)
- Gas Generation Testing (GGT)
- Container Management

For additional details, see the attached *Processes and Equipment to be Reviewed During Audit A-15-18 of INL/CCP*.

Governing Documents/Requirements:

Adequacy of INL/CCP documents will be based on the current revisions of the following documents:

- Waste Isolation Pilot Plant Hazardous Waste Facility Permit NM4890139088-TSDF
- DOE/CBFO-94-1012, *Quality Assurance Program Document*
- DOE/WIPP-02-3214, *Remote-Handled TRU Waste Characterization Program Implementation Plan*
- DOE/WIPP-02-3122, *Transuranic Waste Acceptance Criteria for the Waste Isolation Pilot Plant*

Programmatic and technical checklists will be developed from the active 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-024, *CCP/INL Interface Document*
- CCP-PO-501, *CCP/INL RH TRU Waste Interface Document*
- Related INL/CCP and NWP QA and technical implementing procedures

Schedule of Audit Activities:

A pre-audit conference will be held Tuesday, June 16, 2015, at 8:30 a.m.

Audit team caucus meetings will be held Tuesday and Wednesday, June 16 and 17, 2015, at 4:00 p.m.

Daily management briefings will be held Wednesday and Thursday, June 17 and 18, 2015, at 8:30 a.m.

An audit team caucus meeting will be held Thursday, June 18, 2015, at 2:00 p.m.

A post-audit conference is scheduled for Thursday, June 18, 2015, at 3:30 p.m.

All meetings will take place at the designated INL and Carlsbad locations.

Prepared by: Tamara D. Ackman Date: 05/12/15
Tamara D. Ackman, CTAC
Audit Team Leader

Concurrence: D. J. Michels FOR Date: 5-12-15
Michael R. Brown, Director
CBFO Quality Assurance Division

Processes and Equipment to be Reviewed During Audit A-15-18 of the INL/CCP

| WIPP # | Process/Equipment Description | Applicable to the Following Waste Streams/Groups of Waste Streams | Currently Approved by NMED | Currently Approved by EPA |
|--|--|---|----------------------------|---------------------------|
| <u>NEW PROCESSES OR EQUIPMENT</u> | | | | |
| 14601C2 | Radiological characterization analysis using ORIGEN2.2 As identified in CCP-RC-INL-601 | Debris (S5000) | N/A | YES |
| 14631C3 | Radiological characterization neutron dose-to-curie (DTC) method by confirmation As identified in CCP-RC-INL-631 | Debris (S5000) | N/A | YES |
| <u>PREVIOUSLY APPROVED PROCESSES OR EQUIPMENT</u> | | | | |
| 14VE1 | Visual Examination (VE) Procedure – CCP-TP-006 Description – Visual Examination Technique (VET) | Solids (S3000) Soils (S4000) Debris (S5000) | YES | YES |
| 14RHVE1 | Visual Examination Procedure – CCP-TP-500 Description - The VE of audio/video media process used for a total of 70 retrievably stored remote-handled (RH) debris waste drums | Solids (S3000) Soils (S4000) Debris (S5000) | YES | YES |
| 14RRH1 | Nondestructive Examination Procedure – CCP-TP-508 Equipment – RTR-RTR-0659 Description – VJ Technologies, Real-time Radiography Characterization (RTR-RTR-0659) System | Solids (S3000) Debris (S5000) | YES | YES |
| N/A | Acceptable Knowledge | Solids (S3000) Soils (S4000) Debris (S5000) | YES | YES |
| N/A | Data Validation and Verification | Solids (S3000) Soils (S4000) Debris (S5000) | YES | YES |

Processes and Equipment to be Reviewed During Audit A-15-18 of the INL/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 | WIPP Waste Information System (WWIS)/Waste Data System (WDS) | Solids (S3000) Soils (S4000) Debris (S5000) | YES | YES |
| 14SGRS1 | Nondestructive Assay Procedure – CCP-TP-115 Description – Stored Waste Examination Pilot Plant (SWEPP) Gamma Ray Spectrometer (SGRS) | Solids (S3000) Soils (S4000) Debris (S5000) | N/A | YES |
| 14WAGS1 | Nondestructive Assay Procedure – CCP-TP-019 Description – Waste Assay Gamma Spectrometer | Solids (S3000) Soils (S4000) Debris (S5000) | N/A | YES |
| 14DTC1 | Radiological characterization process using dose-to-curie (DTC) and modeling-derived scaling factors for assigning radionuclide values to RH waste stream Dose-rate fractional contribution of Cs-137 and Co-60 using OSPREY La ₃ Br(Ce) gamma detector Procedure CCP-TP-504 | Solids (S3000) Debris (S5000) | N/A | YES |
| 14GG1 | Gas Generation Testing Procedure – CCP-TP-083 Equipment – MGSS Unit/Cart 1 (GC-14B) Description – Gas Generation Testing 55-gallon drums | Waste Type IV | N/A | N/A |
| 14GG2 | Gas Generation Testing Procedure – CCP-TP-083 Equipment – MGSS Unit/Cart 2 (GC-17A) Description – Gas Generation Testing 55-gallon drums | Waste Type IV | N/A | N/A |
| N/A | Load Management | Solids (S3000) Soils (S4000) Debris (S5000) | N/A | YES |
| N/A | Quality Assurance Program | Solids (S3000) Soils (S4000) Debris (S5000) | N/A | YES |