



Department of Energy

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

JUL 28 2015



ENTERED

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

Subject: Transmittal of Audit Plan and Notification of Assigned Auditors for CBFO Audit A-15-21 of the LANL/CCP

Dear Mr. Kieling:

This letter transmits the audit plan for the Carlsbad Field Office (CBFO) Recertification Audit A-15-21 at the Los Alamos National Laboratory Central Characterization Program (LANL/CCP) facilities and at the Skeen-Whitlock Building in Carlsbad, for transuranic waste characterization activities. The audit will be conducted as required by the Waste Isolation Pilot Plant Hazardous Waste Facility Permit, and will be held at the LANL facilities in Los Alamos, New Mexico, September 1 – 3, 2015. 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 fines and imprisonment for knowing violations.

Should you have any questions concerning this notification, please contact Mr. Dennis S. Miehls, Senior Quality Assurance Specialist, at (575) 234-7491.

Sincerely,

Dana C. Bryson
Dana C. Bryson, Acting Manager
Carlsbad Field Office

Enclosure

cc: w/enclosure

D. Bryson, CBFO	*ED	V. Daub, CTAC	ED
M. Brown, CBFO	ED	R. Allen, CTAC	ED
J.R. Stroble, CBFO	ED	P. Martinez, CTAC	ED
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S. Holmes, NMED	ED	CBFO M&RC	
C. Smith, NMED	ED	*ED denotes electronic distribution	



CARLSBAD FIELD OFFICE AUDIT PLAN

Audit Number: A-15-21

Organization to be Audited: Los Alamos National Laboratory (LANL) Central Characterization Program (CCP)
Nuclear Waste Partnership LLC (NWP)

Organizations to be Notified: NWP/CCP
U.S. Department of Energy, Los Alamos Field Office
U.S. Environmental Protection Agency
New Mexico Environment Department

Date and Location: September 1 – 3, 2015
Los Alamos, NM and Carlsbad, NM

Audit Team:

Dennis Miehl	CBFO Office of Quality Assurance, Management Representative
Martin Navarrete	CBFO Office of Quality Assurance
Greg Knox	Audit Team Leader, CBFO Technical Assistance Contractor (CTAC)
Wayne Ledford	Auditor, CTAC (CCP/LANL Interface)
Tammy Ackman	Auditor, CTAC (AK)
Katie Martin	Auditor, CTAC (RTR)
Berry Pace	Auditor, CTAC (VE)
Cindi Castillo	Auditor, CTAC (NDA)
Jim Schuetz*	Auditor, CTAC (WWIS/WDS)
Prissy Martinez*	Auditor, CTAC (C6 QA)
Dick Blauvelt	Technical Specialist, CTAC (AK, Waste Certification and Load Management)
Judith Stewart	Technical Specialist, CTAC (AK)
Porf Martinez	Technical Specialist, CTAC (RTR)
Rhett Bradford	Technical Specialist, CTAC (VE)
James Oliver	Technical Specialist, CTAC (NDA)
Paul Gomez	Technical Specialist, CTAC (PL V&V)
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 Summary Category Group (SCG) S4000 soils/gravel, and SCG S5000 debris waste. See the attached Processes and Equipment to be Evaluated During Audit A-15-21 of the LANL/CCP for additional details.

Governing Documents/Requirements

Overall program adequacy and effectiveness of the LANL/CCP processes will be based on the current revisions of the following documents.

- DOE/CBFO-94-1012, *Quality Assurance Program Document*
- 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 QA 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)
- Real-time Radiography (RTR)
- Visual Examination (VE)
- Visual Examination Technique (VET), Off-Site Source Recovery Program
- Nondestructive Assay (NDA) and participation in the Performance Demonstration Program (PDP)
- Generation and Project-Level Data Validation and Verification (V&V)
- WIPP Waste Information System (WWIS)/Waste Data System (WDS)
- Waste Certification (e.g., Waste Stream Profile Form)

Transportation

- Container Management
- Flammable Gas Analysis
- Shipping Documentation

Schedule of Audit Activities:

A pre-audit conference is scheduled for Tuesday, September 1, 2015, at 8:30 a.m.

Audit team caucus meetings will be held Tuesday, September 1, and Wednesday September 2, 2015, at 4:00 p.m., and Thursday, September 3, 2015, at 2:00 p.m.

The audit team will brief appropriate LANL and CCP management on Wednesday, September 2, and Thursday, September 3, 2015, at 8:30 a.m.

A post-audit conference is scheduled for Thursday, September 3, 2015, 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:



Greg Knox, Audit Team Leader
CTAC

Date: 10 July 2015

Concurrence:



Michael R. Brown, Director
Office of Quality Assurance

Date: 7-22-15

Processes and Equipment to be Evaluated During Audit A-15-21 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
PROCESSES TO BE EVALUATED FOR INITIAL CERTIFICATION				
11HC3	Nondestructive Assay Procedure – CCP-TP-103, CCP-TP-107, CCP-TP-108 Description – Canberra Industries High Efficiency Neutron Counter (HENC) mounted in a trailer	Soils/Gravel (S4000) Debris (S5000)	N/A	NO
PREVIOUSLY APPROVED PROCESSES OR EQUIPMENT				
11HC1	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
11HC2	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
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
11MILCC1	Nondestructive Assay Procedure(s) – CCP-TP-076, CCP-TP-077 and CCP-TP-103 Description – Mobile In-Situ Object Counting System (ISOCS) Large Container Counter (MILCC)	Soils/Gravel (S4000) Debris (S5000)	N/A	YES

Processes and Equipment to be Evaluated During Audit A-15-21 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
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
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 Description – Project Level Data Verification and Validation	Soils/Gravel (S4000) Debris (S5000)	YES	YES

Processes and Equipment to be Evaluated During Audit A-15-21 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	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
N/A	Quality Assurance Program	Soils/Gravel (S4000) Debris (S5000)	N/A	YES