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, 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. Strobile, CBFO  ED  P. Martinez, CTAC  ED  
G. Basabivlazao, CBFO  ED  B. Pace, CTAC  ED  
D. Miehls, CBFO  ED  G. Knox, CTAC  ED  
M. Navarrete, CBFO  ED  D. Harvill, CTAC  ED  
N. Castaneda, CBFO  ED  G. White, CTAC  ED  
G. Birge, CBFO  ED  A. Urquidez, RES  ED  
R. Maestas, NMED  ED  CBFO QA File  ED  
S. Holmes, NMED  ED  CBFO M&RC  ED  
C. Smith, NMED  ED  *ED denotes electronic distribution  

CBFO:QA:DSM:SG:15-0771:UFC 2300.00  
150728
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 Miehls: 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
CTAG

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

<table>
<thead>
<tr>
<th>WIPP #</th>
<th>Process/Equipment Description</th>
<th>Applicable to the Following Waste Streams/Groups of Waste Streams</th>
<th>Currently Approved by NMED</th>
<th>Currently Approved by EPA</th>
</tr>
</thead>
<tbody>
<tr>
<td>11HC3</td>
<td>Nondestructive Assay Procedure – CCP-TP-103, CCP-TP-107, CCP-TP-108 Description – Canberra Industries High Efficiency Neutron Counter (HENC) mounted in a trailer</td>
<td>Soils/Gravel (S4000) Debris (S5000)</td>
<td>N/A</td>
<td>NO</td>
</tr>
<tr>
<td>11HC1</td>
<td>Nondestructive Assay Procedure – CCP-TP-063, CCP-TP-064, CCP-TP-103 Description – Canberra Industries High Efficiency Neutron Counter (HENC) mounted in a trailer.</td>
<td>Soils/Gravel (S4000) Debris (S5000)</td>
<td>N/A</td>
<td>YES</td>
</tr>
<tr>
<td>11HC2</td>
<td>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.</td>
<td>Soils/Gravel (S4000) Debris (S5000)</td>
<td>N/A</td>
<td>YES</td>
</tr>
<tr>
<td>11SHC1</td>
<td>Nondestructive Assay Procedure – CCP-TP-059, CCP-TP-064, CCP-TP-103 Description – Super High-Efficiency Neutron Counter mounted in a trailer, SWBs</td>
<td>Soils/Gravel (S4000) Debris (S5000)</td>
<td>N/A</td>
<td>YES</td>
</tr>
<tr>
<td>11MILCC1</td>
<td>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)</td>
<td>Soils/Gravel (S4000) Debris (S5000)</td>
<td>N/A</td>
<td>YES</td>
</tr>
</tbody>
</table>
## Processes and Equipment to be Evaluated During Audit A-15-21 of the LANL/CCP

<table>
<thead>
<tr>
<th>WIPP #</th>
<th>Process/Equipment Description</th>
<th>Applicable to the Following Waste Streams/Groups of Waste Streams</th>
<th>Currently Approved by NMED</th>
<th>Currently Approved by EPA</th>
</tr>
</thead>
<tbody>
<tr>
<td>11HERTR3</td>
<td><strong>High Energy Real-Time Radiography (HERTR)</strong>&lt;br&gt;Procedures CCP-TP-053 and CCP-TP-198&lt;br&gt;Description – High Energy Real-Time Radiography (RTR) [built by VJ Technologies] 55-gallon drums and SWBs</td>
<td>Soils/Gravel (S4000) Debris (S5000)</td>
<td>YES</td>
<td>YES</td>
</tr>
<tr>
<td>11VE1</td>
<td><strong>CH Visual Examination</strong>&lt;br&gt;Procedure – CCP-TP-113&lt;br&gt;Description – CH Characterization performed utilizing Visual Examination (VE) and Acceptable Knowledge (AK)</td>
<td>Soils/Gravel (S4000) Debris (S5000)</td>
<td>YES</td>
<td>YES</td>
</tr>
<tr>
<td>11VE2</td>
<td><strong>Off-Site Source Recovery Program</strong>&lt;br&gt;Procedure(s) – CCP-TP-069 and CCP-TP-101&lt;br&gt;Description – Characterization performed utilizing Visual Examination (VE) and Acceptable Knowledge (AK)</td>
<td>Debris (S5000)</td>
<td>YES</td>
<td>YES</td>
</tr>
<tr>
<td>N/A</td>
<td><strong>Acceptable Knowledge</strong>&lt;br&gt;Procedure – CCP-TP-005&lt;br&gt;Description – Acceptable Knowledge (AK)</td>
<td>Soils/Gravel (S4000) Debris (S5000)</td>
<td>YES</td>
<td>YES</td>
</tr>
<tr>
<td>N/A</td>
<td><strong>Data Verification and Validation</strong>&lt;br&gt;Procedure(s) – CCP-TP-001, CCP-TP-002, CCP-TP-003, CCP-TP-103, CCP-TP-162&lt;br&gt;Description – Project Level Data Verification and Validation</td>
<td>Soils/Gravel (S4000) Debris (S5000)</td>
<td>YES</td>
<td>YES</td>
</tr>
</tbody>
</table>
# Processes and Equipment to be Evaluated During Audit A-15-21 of the LANL/CCP

<table>
<thead>
<tr>
<th>WIPP #</th>
<th>Process/Equipment Description</th>
<th>Applicable to the Following Waste Streams/Groups of Waste Streams</th>
<th>Currently Approved by NMED</th>
<th>Currently Approved by EPA</th>
</tr>
</thead>
<tbody>
<tr>
<td>N/A</td>
<td>WIPP Waste Information System/Waste Data System (WWIS/WDS) Procedure – CCP-TP-030 Description – CH TRU Waste Characterization and WWIS Data Entry</td>
<td>Soils/Gravel (S4000) Debris (S5000)</td>
<td>YES</td>
<td>YES</td>
</tr>
<tr>
<td>N/A</td>
<td>Quality Assurance Program</td>
<td>Soils/Gravel (S4000) Debris (S5000)</td>
<td>N/A</td>
<td>YES</td>
</tr>
</tbody>
</table>