



Allen, Pam, NMENV

From: Maestas, Ricardo, NMENV
Sent: Monday, July 18, 2016 9:52 AM
To: Allen, Pam, NMENV
Subject: FW: ORNL CC Inspection Scope
Attachments: ORNL CC Scope 6-27-16 final.pdf

From: Feltcorn, Ed [<mailto:Feltcorn.Ed@epa.gov>]
Sent: Monday, June 27, 2016 12:23 PM
To: Tom Carver; Norma Castaneda (norma.castaneda@cbfo.doe.gov)
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Subject: ORNL CC Inspection Scope

Attached find the Scope of our Inspection of ORNL for Aug 2-4.

If you have questions, Ed Feltcorn 703-508-4084



**Scope of EPA's Continued Compliance Inspection of the Oak Ridge National Laboratory-
Central Characterization Project (ORNL-CCP) at the Transuranic Waste Processing
Center (TWPC),
Oak Ridge National Laboratory (ORNL), Oak Ridge, Tennessee**

Organizations Notified: Department of Energy – Carlsbad Field Office (CBFO)
New Mexico Environment Department (NMED)
EPA Region IV
Tennessee Department of Environment & Conservation (TNDEC)

Inspection Dates: August 2–4, 2016

Inspection Schedule: Tuesday 8:00 am – Kick-off,
Tuesday 8:30 am – 4:30 pm, Conduct Inspection
Wednesday 8:00 am – 4:30 pm, Conduct Inspection
Thursday 8:00 am – 3:00 pm, Conduct Inspection
Thursday 4:00 pm – Close-out

Inspection Team: Ed Felcorn, U.S. EPA Headquarters (Lead Inspector)
Rajani Joglekar, U.S. EPA Headquarters
Kira Darlow, EPA Contractor (SC&A)
Amy Meldrum, EPA Contractor (SC&A)
Rose Gogliotti, EPA Contractor (SC&A)
Patrick Kelly, EPA Contractor (SC&A)

Inspection Scope:

EPA will conduct a continued compliance inspection of the ORNL-CCP waste characterization program for transuranic (TRU) waste intended for disposal at the Waste Isolation Pilot Plant (WIPP). This inspection will take place on site at the TWPC in Oak Ridge, Tennessee. The purpose of this inspection is to verify that specific elements of the ORNL-CCP TRU waste characterization program continue to be in compliance with EPA's baseline approval. The scope of this inspection includes the following waste characterization elements:

- Acceptable Knowledge (AK) for CH and RH AK, sampled from all applicable Summary Category Groups (SCGs) including documents produced to comply with changes to CCP-TP-005, Rev 27 or later
- Non Destructive Assay (NDA) for assaying CH TRU wastes, specifically the IQ3 and Mobile ISOCS Large Container Counter 2 (MILCC 2) NDA systems
- Dose-To-Curie (DTC) for assaying RH TRU wastes
- Real-Time Radiography (RTR) for CH TRU wastes, including ORNL-CCP's implementation of specific aspects to address a recently-closed EPA concern requiring a response (LANL-CCP-CC-CH-2015-RTR-04CR).
- Visual Examination (VE) for RH TRU wastes

- Waste Data System (WDS) to demonstrate tracking the certification status of previously certified containers and tracking of those with approved AK in accordance with CCP-TP-005, Rev 27 or later

EPA personnel will be present and they will direct all inspection-related activities that will be performed by EPA's support contractor, SC&A. The EPA Inspection Team will evaluate the elements indicated above in accordance with 40 CFR 194.8(b) and will assess the adequacy, implementation and effectiveness of the technical processes that ORNL-CCP uses to characterize CH and RH TRU wastes intended for disposal at WIPP. EPA will evaluate personnel qualifications/training by review of records and conducting interviews, operating procedures, technical documents, records and measurement systems, as appropriate, to determine ORNL-CCP's compliance with the EPA-approved baseline conditions.

During the inspection, if deemed necessary, EPA may conduct spot checks on waste management activities conducted to comply with the hazardous waste regulations of the States of New Mexico and Tennessee.

Documents:

EPA has received documents and records related to AK, WDS, NDA, DTC and NDE.

Additional Documents:

For the IQ3 and MILCC NDA systems, EPA has requested a list of containers of TRU wastes that were assayed on these systems to select containers for replicate runs. EPA will provide the number of containers to be re-assayed and their identification numbers.

For AK, EPA has requested a list of containers with characterization dates or a list of containers characterized since August 26, 2015. EPA may request additional AK records after receiving this list.

Pre-Inspection Conference Call:

EPA requests a conference call with ORNL-CCP personnel during the week of July 18, 2016 at a mutually convenient time to be coordinated through CBFO.

Inspection Logistics:

A week before the inspection, EPA requests that CBFO/ORNL-CCP provide the location to be used for the inspection opening and closing meetings. EPA also requests that ORNL-CCP provide office space for the Inspection Team members to conduct interviews and review documents. The inspection logistics are as follows:

- The EPA Inspection Team Leader will conduct an opening meeting for the inspection with the appropriate personnel from CBFO, ORNL-CCP and their support contractors at 8:00 am on August 2, 2016.
- The EPA Inspection Team members will begin the inspection directly following the opening meeting, and will continue until 4:30 pm on Wednesday, August 3, 2016.
- The EPA Inspection Team Leader will meet with the appropriate CBFO and ORNL-CCP personnel August 3 and 4, 2016, at 8:00 am for a daily briefing, as appropriate.

- The EPA Inspection Team members will conduct the inspection from 8:00 am to 4:30 pm on Wednesday, August 3, 2016, to conduct the evaluation. The EPA Inspection Team members will stop inspecting at 3:00 pm on Thursday, August 4, 2016.
- An inspection close-out meeting will be held August 4, 2016, at 4:00 pm

Please note that all dates and times listed above may be adjusted to accommodate personnel availability, logistical considerations or the inspection's progress, as required. If the EPA Inspection Team is able to complete all inspection aspects earlier than indicated above, the timing of the close-out meeting may change. CBFO QA is welcome to provide observers for the EPA inspection.