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Department of Energy
Carlsbad Field Office
P. O. Box 3090
Carlsbad, New Mexico 88221
SEP 08 2016



Johnny Moore
Manager
ORNL Office of Environmental Management
U.S. Department of Energy
Post Office Box 2008
Oak Ridge, Tennessee 37831

Subject: Notification Letter

Enclosure: *DOE-CBFO and Nuclear Waste Partnership LLC, Generator Site Technical Review (GSTR) Plan GSTR-OR-1-16-01*

Dear Mr. Moore:

Due to a new key element in Chapter 18 of the Waste Isolation Pilot Plant (WIPP) Documented Safety Analysis (DSA) which has been included in the latest revision of the WIPP Waste Acceptance Criteria (WAC), Nuclear Waste Partnership (NWP), the operating contractor at WIPP, and the Carlsbad Field Office (CBFO) are now required to conduct Generator Site Technical Reviews (GSTR) at each generator site. In keeping with the Memorandum of Agreement (MOA) between Oak Ridge National Laboratory (ORNL) and CBFO, my staff has coordinated with members of your staff and contractors to prepare for this effort. The GSTR for ORNL has been scheduled to begin the onsite portion on Monday, September 19, 2016, and will be conducted within the confines of the attached site specific scope and the CBFO GSTR Plan and Procedure which has been previously provided to your staff. Final Lines of Inquiry (LOIs) will be provided to your staff once approved.

Questions regarding the specifics of the GSTR may be directed to Courtland Fesmire at (575) 706-0044.

Sincerely,

Todd Shrader, Manager
Carlsbad Field Office

Enclosure

cc:
W. McMillan, ORNL *ED
M. Kass, ORNL ED
J. Hutton, EM-HQ ED
M. Brown, CBFO ED

*ED denotes electronic distribution





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

SEP 08 2016

Susan Cange
Manager
ORNL Office of Environmental Management
U.S. Department of Energy
Post Office Box 2008
Oak Ridge, Tennessee 37831

Subject: Notification Letter

Enclosure: *DOE-CBFO and Nuclear Waste Partnership LLC, Generator Site Technical Review (GSTR) Plan GSTR-OR-1-16-01*

Dear Ms. Cange:

Due to a new key element in Chapter 18 of the Waste Isolation Pilot Plant (WIPP) Documented Safety Analysis (DSA) which has been included in the latest revision of the WIPP Waste Acceptance Criteria (WAC), Nuclear Waste Partnership (NWP), the operating contractor at WIPP, and the Carlsbad Field Office (CBFO) are now required to conduct Generator Site Technical Reviews (GSTR) at each generator site. In keeping with the Memorandum of Agreement (MOA) between Oak Ridge National Laboratory (ORNL) and CBFO, my staff has coordinated with members of your staff and contractors to prepare for this effort. The GSTR for ORNL has been scheduled to begin the onsite portion on Monday, September 19, 2016, and will be conducted within the confines of the attached site specific scope and the CBFO GSTR Plan and Procedure which has been previously provided to your staff. Final Lines of Inquiry (LOIs) will be provided to your staff once approved.

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Sincerely,

Todd Shrader, Manager
Carlsbad Field Office

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M. Brown, CBFO ED

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**DOE-CBFO AND NUCLEAR WASTE PARTNERSHIP LLC
GENERATOR SITE TECHNICAL REVIEW (GSTR) PLAN
GSTR-OR-1-16-01**

Organization to be Reviewed:

Oak Ridge National Laboratory (ORNL) – TRU Waste Processing Center (TWPC); Nuclear Fuel Services (NFS); and the Radiochemical Engineering Development Center (REDC).

Purpose and Scope of the Review:

The purpose of this review is to assess this DOE sites' Waste Management Program and Certified Program processes that govern TRU waste packaging, treatment, certification and management. The review will ensure that necessary and sufficient processes and procedures are in place and are implemented to assure TRU waste containers meet WIPP WAC requirements prior to transfer or re-entry into the Certified Program, and that deficiencies are detected and corrected prior to shipment to WIPP.

This review will focus on the following programs:

- Quality assurance program, including training for waste generators
- Performance assurance program and issues management system
- Conduct of operations, including verification that changes to existing procedures and processes related to TRU waste management are incorporated into acceptable knowledge
- Federal oversight at the DOE site (CBFO only)
- TRU waste management programs at the DOE site that result in the following:
 - Waste generation, treatment, and packaging processes
 - Resource Conservation and Recovery Act (RCRA) permitting and implementation
 - Hazardous waste determinations
- Deferred maintenance (i.e., potential impacts to TRU waste processes)

The scope of this review will include but not be limited to TRU waste packaging and processes at the TWPC and REDC and NFS facilities, prior to presentation the WIPP Certified Program(s), and consist of the following elements:

- Evaluation of waste generator repackaging operations that prepare TRU waste for characterization;
- Implementation of waste generator site processes as they relate to TRU waste management;
- Verification that changes to processes are correctly incorporated into acceptable knowledge summary reports;
- Verification of effective implementation documentation and programs to ensure that waste generator activities comply with the generator site Resource Conservation and Recovery Act permit;

- Evaluation of local site office oversight of TRU waste operations; and
- Evaluation of waste generator site deferred maintenance in TRU waste program operations.

The scope also includes the following Key Element (KE), included in DOE/WIPP 07-3372, *WIPP Documented Safety Analysis (DSA)*, Chapter 18:

KE 18-4: The WIPP M&O Contractor performs Generator Site Technical Review, which are reviews of DOE Sites' and Certified Programs' implementation of WIPP requirements (excluding DOE activities). Basis for selection: This KE aids in ensuring WIPP WAC compliance by confirming the ability of the Certified Program to ensure noncompliant materials are not present in waste containers, limit the quantity of individual waste container material at risk (MAR), and ensure individual waste container fissile material (i.e., FGE) is within mass limits in order to implement the initial conditions and assumptions of the safety analysis.

Applicable Requirements Documents:

- DOE/CBFO 16-3563, *Waste Isolation Pilot Plant Generator Site Technical Review Plan*
- DOE/WIPP-16-3564, *Generator Site Technical Review Procedure*
- DOE/WIPP 07-3372, *Waste Isolation Pilot Plant Documented Safety Analysis*; Chapter 18, Key Element 18-4
- DOE/WIPP-02-3122, *Transuranic Waste Acceptance Criteria for the Waste Isolation Pilot Plant*
- DOE O 226.1B, *Department of Energy Oversight Policy*
- DOE O 227.1A, *Independent Oversight*
- DOE O 414.1D, *Quality Assurance*
- DOE O 422.2, *Conduct of Operations*
- DOE O 435.1, *Radioactive Waste Management*

Review Team:

Tom Carver, DOE/CBFO, GSTR Team Member
 Court Fesmire, DOE/CBFO, GSTR Coordinator
 Mark Doherty, Technical Specialists, LLP, GSTR Team Member
 Dave Haar, Haar Engineering, PLLC, GSTR Team Member
 Steve Pye, AECOM/URS Professional Solutions, LLC, GSTR Team Member
 Pete Rodriguez, NWP, GSTR Team Lead

Schedule:

Pre-Review Meeting(s):

September 19, 2016, at 9:00 a.m., in the Conference Room/Bldg. selected by TWPC
 September 23, 2016, at the NFS facility in Erwin, TN at the time and area TBD and pending at this time (this meeting will be a repeat of the prior meeting with TWPC, and for the benefit of NFS)

On Site GSTR Activities:

September 19 through 23, 2016

Post-Review Meeting(s):

September 23, 2016, at 3:00 p.m., in the Conference Room/Bldg.

Background:

The consequences of an exothermic reaction of incompatible material in a waste drum (#68660) and the subsequent hazard created by mixing an organic absorbent with a nitrate salt waste (the use of "organic" instead of the directed "inorganic") are described in the following attachment. This attachment depicts Gaps & Weaknesses of controls at the time of the WIPP radiological event and the subsequent improvements and controls designed to prevent recurrence and corrective actions, based on the AIB report.


Signatures:

Establish/
Review/
Approve:


Pete V. Rodriguez,
GSTR Team Lead

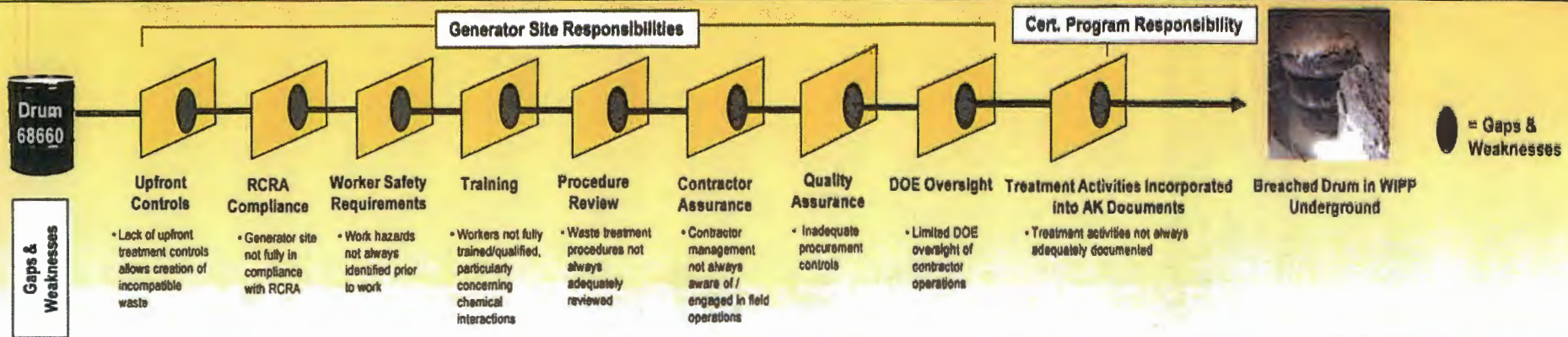
9/14/16
Date

Establish/
Review/
Approve:


Courtland Fesmire, DOE/CBFO
GSTR Coordinator

9/11/16
Date

TRU Waste controls at time of WIPP radiological event . . .



Strengthened TRU Waste controls designed to prevent event recurrence . . .

