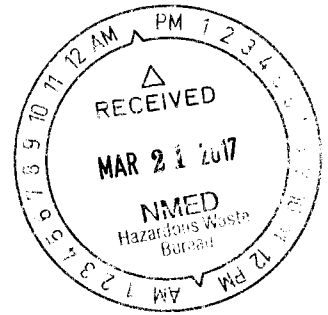




ENTERED

Department of Energy
Carlsbad Field Office
P. O. Box 3090
Carlsbad, New Mexico 88221
MAR 14 2017



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

Subject: Audit Plan and Notification of Assigned Auditors for CBFO Audit A-17-20 of the Hanford Central Characterization Program

Dear Mr. Kieling:

This letter transmits the audit plan for Carlsbad Field Office (CBFO) Recertification Audit A-17-20 of the Hanford Central Characterization Program (CCP) transuranic waste characterization activities. The audit will be conducted as required by the Waste Isolation Pilot Plant (WIPP) Hazardous Waste Facility Permit (HWFP), and will take place at the Skeen-Whitlock Building in Carlsbad, New Mexico, April 26 – 27, 2017. The audit plan identifies the audit team members as required by the Permit.

The Permit requires that the U.S. Department of Energy (DOE) conduct audits of each site prior to certifying that the site meets the waste characterization requirements for shipment of waste to the WIPP. In accordance with Attachment C6 of the Permit, audits must be performed, at least, annually after the initial audit to determine continued compliance with the Permit Waste Analysis Plan. In a letter dated March 2, 2012, from John E. Kieling, Acting Chief, New Mexico Environment Department (NMED) Hazardous Waste Bureau, to Jose Franco, Manager, CBFO, NMED clarified that DOE must continue to perform annual audits of Hanford/CCP characterization activities, and further directed, "If DOE cannot determine that the Hanford/CCP meets the requirements in Section 2.3.2.1 of the Permit, the Permittees shall not manage, store, or dispose waste from Hanford at WIPP, as required by section 2.3.2 of the Permit. Further, once waste characterization operations resume at Hanford, DOE must conduct a full site-specific audit at Hanford before waste shipments can be sent from Hanford to WIPP."

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. Martin P. Navarrete, Senior Quality Assurance Specialist, CBFO Office of Quality Assurance, at (575) 234-7483.

Sincerely,

Todd Shrader
for Todd Shrader, Manager
Carlsbad Field Office
Deputy Mgr

Enclosure



Mr. John E. Kieling

-2-

MAR 14 2017

cc: w/enclosure

S. Ross, EM-3.113	* ED
J. Carswell, CBFO	ED
M. Brown, CBFO	ED
J.R. Stroble, CBFO	ED
G. Basabilvazo, CBFO	ED
M. Navarrete, CBFO	ED
D. Miehl, CBFO	ED
M. Fineran, CBFO	ED
M. Stapleton, CBFO	ED
N. Castaneda, CBFO	ED
G. Birge, CBFO	ED
T. Carver, CBFO	ED
R. Maestas, NMED	ED
D. Biswell, NMED	ED
V. Daub, CTAC	ED
P. Martinez, CTAC	ED
C. Castillo, CTAC	ED
M. Leroch, CTAC	ED
J. Schuetz, CTAC	ED
D. Harvill, CTAC	ED
G. White, CTAC	ED
A. Urquidez, RES	ED

CBFO QA File

CBFO M&RC

*ED denotes electronic distribution

CARLSBAD FIELD OFFICE

Audit Number: A-17-20

Organization to be Audited: Hanford Site, Nuclear Waste Partnership LLC (NWP)
Central Characterization Program (CCP)

Organizations to be Notified: Hanford Site
NWP
New Mexico Environment Department
Defense Nuclear Facilities Safety Board
U.S. Environmental Protection Agency

Date and Location: April 26 – 27, 2017
Carlsbad, New Mexico

Audit Team: Martin P. Navarrete Carlsbad Field Office (CBFO)
Management Representative
James R. Schuetz Audit Team Leader, CBFO Technical
Assistance Contractor (CTAC)

Audit Scope:

The audit team will evaluate the adequacy, implementation, and effectiveness of the technical and quality assurance (QA) activities performed by NWP CCP at the Hanford host site location for characterization and certification of contact-handled Summary Category Groups S3000 homogeneous solids and S5000 debris waste.

CCP operations at Hanford have been discontinued and no transuranic (TRU) waste characterization activities have been performed at Hanford since the previous recertification audit.

The audit team will evaluate available documentation in support of TRU waste characterization activities performed at Hanford from the date of the previous recertification audit (Audit A-16-11, conducted May 31 – June 1, 2016), complete applicable C6 checklists, and review objective evidence.

The audit will be performed in the Skeen-Whitlock Building in Carlsbad, New Mexico. See the attachment, Processes and Equipment to be Reviewed During Audit A-17-20 of Hanford/CCP, for a list of items that will be evaluated.

Governing Documents/Requirements:

Evaluation of the overall program adequacy and effectiveness of Hanford/CCP documents will be based on the current revisions of the following documents:

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

Programmatic and technical checklists will be developed from the current revisions of the following documents:

- *CCP Transuranic Waste Characterization Quality Assurance Project Plan, CCP-PO-001*
- *CCP Transuranic Waste Certification Plan, CCP-PO-002*
- *Related 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

Quality Assurance

General areas from section C6-1 of the Permit:

- Nonconformances
- Personnel Qualification and Training
- Records

Technical Activities

- Generator and Project-level Data Validation and Verification
- Acceptable Knowledge
- Real-time Radiography
- Visual Examination
- Nondestructive Assay
- Waste Certification (e.g., Waste Stream Profile Form)
- WIPP Waste Information System/Waste Data System

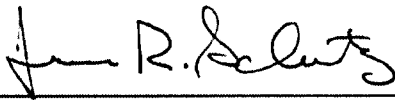
Schedule of Audit Activities:

A pre-audit conference is scheduled for Wednesday, April 26, 2017, at 8:30 a.m.

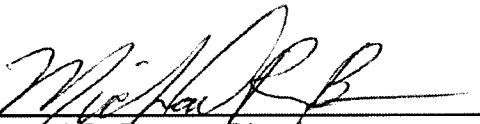
If needed, the audit team leader will conduct a management briefing with appropriate Hanford/CCP management Thursday, April 27, 2017, at 8:30 a.m.

A post-audit conference is scheduled for Thursday, April 27, 2017, at 3:00 p.m.

All meetings will take place at the designated locations in the Skeen-Whitlock Building in Carlsbad, New Mexico.

Prepared by: 
James R. Schuetz, CTAC
Audit Team Leader

Date: 3/13/17

Concurrence: 
Michael R. Brown, Director
CBFO Office of Quality Assurance

Date: 3/13/2017

Processes and Equipment to be Evaluated During Audit A-17-20 of Hanford/CCP

WIPP #	Process/Equipment Description	Applicable to the Following Waste Streams/Groups of Waste Streams	Currently Approved by NMED	Currently Approved by EPA
PREVIOUSLY APPROVED PROCESSES OR EQUIPMENT				
18GEAA	Radiological Characterization by NDA – Hanford Gamma Energy Assay System Unit A – 55-gallon drums Procedure – CCP-TP-071	Debris (S5000) Solids (S3000)	N/A	Suspended
18GEAB	Radiological Characterization by NDA – Hanford Gamma Energy Assay System Unit B – 55-gallon drums Procedure – CCP-TP-071	Debris (S5000) Solids (S3000)	N/A	Suspended
18SHENC	Super High Efficiency Neutron Counter "A" Platform (SHENC) Procedure – CCP-TP-137	Debris (S5000) Solids (S3000)	N/A	Suspended
18RTRA	Real-Time Radiography System – 55-gallon drums Procedure – CCP-TP-053	Debris (S5000) Solids (S3000)	Suspended	Suspended
18RTRB	Real-Time Radiography System – 55-gallon drums Procedure – CCP-TP-053	Debris (S5000) Solids (S3000)	Suspended	Suspended
18HERTR	High-Energy Real-Time Radiography System – 55-/85- gallon drums and SWBs Procedure – CCP-TP-053	Debris (S5000) Solids (S3000)	Suspended	Suspended
18RLVE	Visual Examination Process – SWB and 55-gallon drums Procedure – CCP-TP-113	Debris (S5000)	Suspended	Suspended

Processes and Equipment to be Evaluated During Audit A-17-20 of Hanford/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	Acceptable Knowledge Procedure – CCP-TP-002 and CCP-TP-005	Debris (S5000) Solids (S3000)	Suspended	Suspended
N/A	Data Generation and Project Level Validation & Verification (V&V) Procedure – CCP-TP-001	Debris (S5000) Solids (S3000)	Suspended	Suspended
N/A	WIPP Waste Information System (WWIS)/Waste Data System (WDS) Procedure – CCP-TP-030	Debris (S5000) Solids (S3000)	Suspended	Suspended
N/A	Quality Assurance	Debris (S5000) Solids (S3000)	N/A	YES
NEW PROCESSES OR EQUIPMENT				
Characterization activities are currently suspended; therefore, no new processes or equipment were introduced.				
DEACTIVATED PROCESSES OR EQUIPMENT				
Characterization activities are currently suspended.				