

## Allen, Pam, NMENV

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**From:** Maestas, Ricardo, NMENV  
**Sent:** Friday, June 02, 2017 9:18 AM  
**To:** Allen, Pam, NMENV  
**Subject:** FW: Scope for EPA's Tier 1 inspection of LANL TA-54  
**Attachments:** Scope for EPA T1 inspection at LANL TA-54 May 23-25 2017.pdf



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**Subject:** Scope for EPA's Tier 1 inspection of LANL TA-54

As discussed the inspection is scheduled for the week of May 22 on Tuesday through Thursday. Please note documentation due dates and the scoping/logistics call date. **Note that Rajani Joglekar will be coming part of that week to observe the RNS activity.**

Ed Feltcorn  
703 508 4084



**Scope of the EPA's Tier 1 Change Inspection of the Los Alamos National Laboratory  
Characterization Program for Contact-Handled Transuranic Waste**

**DOE Site:** Los Alamos National Laboratory (LANL)

**Organizations Notified:** Department of Energy – Carlsbad Field Office  
New Mexico Environment Department

**Evaluation Dates:** NDA and NDE Tier 1 Change Evaluation at TA-54: May 23-25, 2017

**Evaluation Schedule:**

|                             |                           |
|-----------------------------|---------------------------|
| Tuesday 8:00 am             | Kick-Off Meeting*         |
| Tuesday 8:30 am – 4:00 pm   | Conduct Tier 1 Evaluation |
| Wednesday 8:00 am – 4:00 pm | Conduct Tier 1 Evaluation |
| Thursday 8:00 am – 1:00 pm  | Conduct Tier 1 Evaluation |
| Thursday 2:30 pm            | Close-Out Meeting*        |

\* With CBFO National TRU Program staff, and LANL-CCP technical leads and management

**EPA Evaluation Team:** Mr. Ed Feltcorn, EPA Lead Inspector  
Mr. Jerry Ellis, EPA Inspector-in-training  
Mr. Patrick Kelly, EPA Support Contractor (SC&A)

**Continued Compliance Scope:**

The EPA will conduct a Tier 1 evaluation of the Central Characterization Program's (CCP's) waste characterization activities located in TA-54 at LANL. The EPA will evaluate the implementation of nondestructive assay (NDA), and Real Time Radiography/Visual Examination (RTR/VE). EPA will conduct this inspection in accordance with 40 CFR 194.8(b) to evaluate the adequacy, implementation, and effectiveness of the technical processes implemented by LANL-CCP for characterizing contact-handled (CH) transuranic (TRU) waste. The technical areas of the scope and the required documents are detailed below as are the elements that EPA must observe and/or inspect to successfully determine that the LANL TRU CH waste characterization is in compliance with EPA regulations.

**Equipment to be evaluated:**

HENC #2 (High Energy Neutron Counter #2)  
SuperHENC (Super High Energy Neutron Counter)  
MILCC (Mobile ISOCS Large Container Counter)  
HE RTR (High Energy Real Time Radiography)

**Documentation needs for NDA Equipment by May 15<sup>th</sup>:**

- Identify and provide the current revision of the calibration documents for the HENC#2, SuperHENC and MILCC NDA systems for all NDA systems approved by EPA, including scale(s). These include each system's calibration of record, calibration

confirmations, calibration verifications, determination of each system's Lower limit of detection (LLD) and Total Measurement Uncertainty (TMU).

- Listing of current revisions of all calibration, operating, calculation, and data validation procedures for the HENC#2, SuperHENC and MILCC NDA systems.
- Provide the number of calibration verifications or other evidence of instrument performance for the HENC#2, SuperHENC and MILCC NDA systems over the last 2 years. EPA will request a sample of these to evaluate during the inspection.
- Listing of container numbers that are available for EPA replicate analyses for the HENC#2, SuperHENC and MILCC NDA systems.
- Listing of all active NDA personnel (operators, data validators, independent technical reviewers and expert analysts) including the list of Qualified Individuals (LOQI) for all personnel.
- The EPA will expect to receive BDR(s) from each NDA system for review and will select specific containers for replicate analyses for one or more NDA systems.

EPA will observe all operating NDA systems on site at LANL for this continued compliance inspection.

**Real-Time Radiography Documentation Requested by May 15<sup>th</sup>:**

To successfully determine LANL's continued compliance for RTR, EPA must observe the RTR processes for WIPP-bound TRU waste. EPA must observe the characterization processes with actual TRU waste.

Directly following submission of this scope, EPA will request several BDRs for review. Copies of the selected, written BDRs are required for review prior to the onsite visit, as are the audio/visual (A/V) records. EPA will observe the RTR operations for WIPP-bound TRU waste and review the documents below prior to the on site evaluation at LANL.

- RTR A/V records.
- LOQIs for the dates encompassed by the selected RTR BDRs.
- Copies of any NCRs for the selected RTR BDRs.
- The last training and test drum examination for RTR operators identified in the selected RTR BDRs, including container inventory sheets, evaluation sheets and A/V recordings.
- Qualification packages for selected RTR operators (to be identified following BDR review).
- Lists of NCRs generated for RTR in the last year.

**Pre-Evaluation Conference Call:**

A conference call between EPA, CBFO and LANL staff will be held on Wednesday, May 10, 2017, at 1:00 PM eastern time, to review the scope of the EPA's T1 evaluation of the NDA and HERTR systems at TA-54. During this call the EPA will identify additional document needs, clarify any remaining issues and ensure that all logistical aspects have been addressed and are understood by all parties. The telephone number for the call is 1-866-299-3188, and the participant code is 2023439462#.

**Logistics:**

- A pre-evaluation conference/Kick-Off Meeting will be held Tuesday, May 23, 2017 at 8:00 am at a location designated by LANL.
- A post-evaluation EPA briefing/Close-Out Meeting will be held Thursday, May 25, 2015, at 2:30 pm for this evaluation at a location designated by LANL.

CBFO QA staff is invited to send observers to this activity.