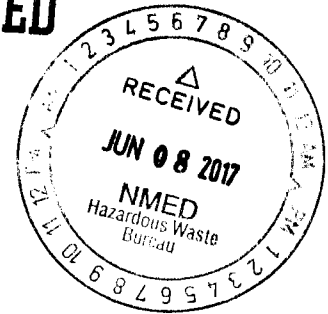




ENTERED

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

JUN 8 2017



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

Subject: Clarification of the Enclosure to the LANL Final Audit Report A-16-19 Related to Summary Category Groups S3000 and S5000 Waste and Waste Processed Through the WCCRF

Reference: (1) CBFO Letter and Enclosure from Todd Shrader to John E. Kieling, NMED; dated August 9, 2016; *CBFO:OQA:DSM:BA:16-1446*; Subject: Transmittal of the Final Report for CBFO Audit A-16-19 of the LANL/CCP  
(2) CBFO Letter from Michael R. Brown to Mary McDaniel, Nuclear Waste Partnership LLC; dated April 26, 2017; *CBFO:OQA:MRB:BA:17-1158*; Subject: Issuance of Report for Surveillance S-17-34, Transportation Authorization Surveillance for the LANL/CCP TRU Waste Stored at Waste Control Specialists

Dear Mr. Kieling:

The purpose of this letter is to clarify certain parts of the Carlsbad Field Office's (CBFO) language in the enclosure of the Final Audit Report A-16-19 (reference 1) related to Summary Category Groups (SCGs) S3000 and S5000 waste and waste processed through the Waste Characterization, Reduction and Repackaging Facility (WCCRF). The previous CBFO recertification audits performed of Los Alamos National Laboratory Central Characterization Project (LANL/CCP) did not evaluate remediation activities performed at the WCCRF because the remediation activities are not part of the Central Characterization Program (CCP) Certified Program. Remediation activities are performed by Los Alamos National Laboratory (LANL). Once remediation activities have been completed, containers are sent back to the CCP Certified Program for re-characterization.

A surveillance, S-17-34 (reference 2), was recently performed of LANL/CCP to, in part, evaluate the adequacy of implementation of the CCP-TP-005, *CCP Acceptable Knowledge Documentation* for previously certified waste in a waste stream from SCG S5000 waste. Based on this surveillance performed on LANL/CCP for previously certified waste from SCGT S5000 waste at Waste Control Specialists, it has been verified that the requirements in procedure CCP-TP-005, *CCP Acceptable Knowledge Documentation*, implementing the new enhanced Acceptable Knowledge (AK) requirements, demonstrate compliance with the recently revised *WIPP Waste Acceptance Criteria, Revision 8.0* for processing this waste. The *WIPP Waste Acceptance Criteria, Revision 8.0* now requires previously certified waste to undergo the enhanced AK process including the enhanced Chemical Compatibility Evaluation (CCE). Therefore, previously certified waste from SCGs S3000 and S5000 will be processed through the enhanced AK program including the enhanced CCE utilizing CCP-TP-005 *CCP Acceptable Knowledge Documentation* and will be reviewed and approved in accordance with the CBFO's Plan for Validating Currently Certified Waste (Department of Energy/CBFO-16-3568). Based upon the requirements using CCP-TP-005 and Department of Energy/CBFO-16-3568, non-compliant containers will be screened out during this process. These new processes successfully implemented by CCP and the CBFO provide assurance that only compliant waste will be shipped and emplaced at the WIPP facility.



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 fine and imprisonment for knowing violations.

If you have any questions, please do not hesitate to contact, of my staff, either J.R. Stroble, Director, CBFO ONTP Compliance Division, at (575) 234-7313 or Mr. Jeff Carswell, CBFO Deputy Manager, at (575) 234-7303.

Sincerely,

  
for Todd Shrader, Manager Deputy  
Carlsbad Field Office Manager

cc:

J. Carswell, CBFO \* ED  
M. Hall, CBFO ED  
J. Stroble, CBFO ED  
G. Basabilvazo, CBFO ED  
M. Brown, CBFO ED  
H. Cruickshank, CBFO ED

CBFO M&RC

\*ED denotes electronic distribution