



Department of Energy
Carlsbad Field Office
P. O. Box 3090
Carlsbad, New Mexico 88221
JUN 12 2017

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

NMED
Hazardous Waste Bureau

Subject: Transmittal of the Hazardous Waste Facility Permit Attachment C6 Audit Plan and Notification of Assigned Auditors for CBFO Certification Audit A-17-24, SNL/CCP Remote-Handled Transuranic Waste Characterization Activities

Dear Mr. Kieling:

This letter transmits the audit plan for Carlsbad Field Office (CBFO) Certification Audit A-17-24 of the Sandia National Laboratory/Central Characterization Program (SNL/CCP). The audit will be conducted as required by the Waste Isolation Pilot Plant Hazardous Waste Facility Permit at the Skeen-Whitlock Building in Carlsbad, NM on July 18 – 20, 2017. The audit plan identifies the audit team members as required by the Permit.

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. Dennis S. Miehs, Senior Quality Assurance Specialist, at (575) 234-7491.

Sincerely,

Todd Shrader, Manager
Carlsbad Field Office

Enclosure



Mr. John E. Kieling

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cc: w/enclosure

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*ED denotes electronic distribution

CARLSBAD FIELD OFFICE

Audit Number: A-17-24

Organization to be Audited: Sandia National Laboratory (SNL), Nuclear Waste Partnership LLC (NWP)
Central Characterization Program (CCP)

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

Date and Location: July 18 – July 20, 2017
Carlsbad, New Mexico

Audit Team: Dennis S. Miehls Carlsbad Field Office (CBFO)
Management Representative
Paul C. Gomez 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 CCP at the Sandia host site location for characterization and certification of remote-handled (RH) Summary Category Group S5000 debris waste.

CCP operations at Sandia have been discontinued and no transuranic (TRU) waste characterization activities have been performed at SNL since 2014. There is no certified equipment at SNL. Certification activities for RH waste are also currently suspended by the host site.

The audit team will evaluate available documentation in support of TRU waste characterization activities performed at SNL from the certification audit (Audit A-15-25, conducted August 18 – 20, 2015 through A-17-10, conducted November 15-17, 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-17-24 of SNL/CCP, for a list of items that will be evaluated.

Governing Documents/Requirements:

Evaluation of the overall program adequacy and effectiveness of SNL/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*
- *Transuranic Waste Acceptance Criteria for the Waste Isolation Pilot Plant, DOE/WIPP-02-3122*
- *Remote-Handled TRU Waste Characterization Program Implementation Plan*
- *WIPP Documented Safety Analysis, Chapter 18*

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
- Visual Examination
- Nondestructive Assay (Dose-to-Curie)
- 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 Tuesday, July 18, 2017, at 8:30 a.m.

If needed, the audit team leader will conduct a management briefing with appropriate SNL/CCP management Wednesday and Thursday, July 19 and 20, 2017, at 8:30 a.m.

A post-audit conference is scheduled for Thursday, July 20, 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:



Paul C. Gomez, CTAC
Audit Team Leader

Date: June 6, 2017

Concurrence:



Michael R. Brown, Director
CBFO Office of Quality Assurance

Date: 6/8/2017

Processes and Equipment to be Reviewed During Audit A-17-24 of SNL/CCP

WIPP #	Process/Equipment Description	Applicable to the Following Summary Category Groups	Currently Approved by NMED	Currently Approved by EPA
The following will be evaluated during CBFO Audit A-17-24				
20RHVE1	Visual Examination CCP-TP-500, CCP Remote-Handled Waste Visual Examination	Debris (S5000)	No	No
N/A	Acceptable Knowledge CCP-TP-005, CCP Acceptable Knowledge Documentation	Debris (S5000)	No	No
N/A	Data Verification and Validation CCP-TP-500, CCP Remote-Handled Waste Visual Examination CCP-TP-504, CCP Dose-to-Curie Survey Procedure for Remote-Handled Transuranic Waste	Debris (S5000)	No	No
20DTC1	Dose-to-Curie CCP-TP-504, CCP Dose-to-Curie Survey Procedure for Remote-Handled Transuranic Waste	Debris (S5000)	N/A	No
N/A	Quality Assurance	N/A	N/A	Yes
N/A	WIPP Waste Information System (WWIS)/Waste Data System (WDS)	N/A	No	No