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**Department of Energy**  
Carlsbad Field Office  
P. O. Box 3090  
Carlsbad, New Mexico 88221  
**JUL 05 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-17-25  
of the Argonne National Laboratory Central Characterization Program

Dear Mr. Kieling:

This letter transmits the audit plan for Carlsbad Field Office (CBFO) Recertification Audit A-17-25, Argonne National Laboratory (ANL) Central Characterization Program Transuranic Waste Characterization Activities for Remote-Handled Waste. The audit will be conducted as required by the Waste Isolation Pilot Plant Hazardous Waste Facility Permit, and will be held at the Skeen-Whitlock Building in Carlsbad, NM and the ANL in Argonne, IL on August 15 – 17, 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. Martin P. Navarrete, Senior Quality Assurance Specialist, at (575) 234-7483.

Sincerely,

Todd Shrader, Manager  
Carlsbad Field Office

Enclosure



Mr. John E. Kieling

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JUL 05 2017

cc: w/enclosure

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\*ED denotes electronic distribution

## CARLSBAD FIELD OFFICE AUDIT PLAN

**Audit Number:** A-17-25

**Organization to be Audited:** Argonne National Laboratory (ANL), Nuclear Waste Partnership LLC (NWP) Central Characterization Program (CCP)

**Organizations to be Notified:** ANL  
NWP CCP  
New Mexico Environment Department (NMED)  
Defense Nuclear Facilities Safety Board  
U.S. Environmental Protection Agency (EPA)

**Date and Location:** August 15 – 17, 2017  
Argonne, IL, and Carlsbad, NM

**Audit Team:**

Martin Navarrete	Management Representative, Carlsbad Field Office (CBFO) Office of Quality Assurance (QA)
Katie Chester	Audit Team Leader, CBFO Technical Assistance Contractor (CTAC)
Rick Castillo*	Auditor, CTAC (C6 QA)
John Fernandez	Auditor, CTAC (VE)
Cindi Castillo	Auditor, CTAC (Program Status & Interface Agreement)
Ricardo Chavez	Auditor, CTAC (AK)
Matt Leroch	Auditor, CTAC (DTC & DM)
Randy Fitzgerald	Technical Specialist, CTAC (AK)
Richard Blauvelt**	Technical Specialist, CTAC (AK)
Jim Vernon	Technical Specialist, CTAC (Project Level V&V)
Rhett Bradford	Technical Specialist, CTAC (VE)
Jim Oliver	Technical Specialist, CTAC (DTC & DM)
Dustin Stegman	Technical Specialist-in-Training, CTAC (VE)

\*Personnel auditing in Carlsbad, NM  
\*\*Personnel auditing per teleconference

### Audit Scope:

The audit team will evaluate the continued adequacy, implementation, and effectiveness of the technical and quality assurance (QA) activities performed by NWP/CCP at ANL for characterization of remote-handled (RH) Summary Category Group (SGC) S5000 debris waste. The audit team will also verify that a technical review of the generator site's processes has been performed and that any issues identified during the technical review have been resolved per DOE/WIPP-16-3564, *Generator Site Technical Review Procedure*.

A list of the equipment and processes to be evaluated is attached to this plan (Attachment 1).

## **Governing Documents/Requirements**

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

- *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*
- *Remote-Handled TRU Waste Characterization Program Implementation Plan, DOE/WIPP-02-3214*
- *Waste Isolation Pilot Plant Documented Safety Analysis, DOE/WIPP-07-3372 (Chapter 18)*

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

- *CCP Transuranic Waste Characterization Quality Assurance Project Plan, CCP-PO-001*
- *CCP Transuranic Waste Certification Plan, CCP-PO-002*
- *CCP/ANL RH-TRU Waste Interface Document, CCP-PO-500*
- *CCP Interface Document Preparation, CCP-PO-043*
- *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

### **C6-1 through C6-4 and general QA program elements as applicable**

- Personnel Qualification and Training
- Records
- Quality Improvement/Nonconformances
- Measuring and Test Equipment (M&TE)
- Software Version Installation

**Technical Activities – ANL and Carlsbad, NM**

- Acceptable Knowledge (AK), including waste certification
  - Including, but not limited to, Enhanced Chemical Compatibility Evaluation Memorandum, Basis of Knowledge, AK Assessments, AK Briefings, Interface Waste Management Documents List
- Project-Level Data Validation and Verification (V&V)
- Visual Examination (VE)
- Dose-to-Curie (DTC)
- Dimensional Measurement (DM)
- WIPP Waste Information System (WWIS)/Waste Data System (WDS)
  - Including, but not limited to, Statistical Approach to Material at Risk

**Schedule of Audit Activities:**

A pre-audit conference is scheduled for 9:00 a.m. CDT on Tuesday, August 15, 2017.

Audit team caucuses will be held at 3:30 p.m. CDT on Tuesday and Wednesday, August 15 and 16, 2017, and at 11:00 a.m. CDT on Thursday, August 17, 2017.

Daily management briefings will be held at 8:30 a.m. CDT on Wednesday and Thursday, August 16 and 17, 2017, as needed.

A post-audit conference is scheduled for 12:00 p.m. CDT on Thursday, August 17, 2017.

All meeting locations will be identified on the daily audit schedule.

Prepared by: Katie Chester Date: 6-28-17  
Katie Chester, CTAC  
Audit Team Leader

Concurrence: Michael R. Brown Date: 6/29/2017  
Michael R. Brown, Director  
CBFO Office of Quality Assurance

**Processes and Equipment to Be Evaluated During Audit A-17-25 of the ANL/CCP**

WDS METHOD ID#	Process/Equipment Description	Applicable to the Following Summary Category Groups	Currently Approved by NMED	Currently Approved by EPA
<b>PREVIOUSLY APPROVED PROCESSES OR EQUIPMENT</b>				
The following will be reevaluated during CBFO Audit A-17-25				
8DTC1	Dose-to-Curie CCP-TP-504, CCP Dose-to-Curie Survey Procedure for Remote-Handled Transuranic Waste	Debris (S5000)	N/A	YES
8RHGM1	Dimensional Measurement CCP-TP-513, CCP Procedure for Dimensional or Gravimetric Measurements for Radiological Characterization of Remote-Handled Transuranic Waste	Debris (S5000)	N/A	YES
8RHVE1	Visual Examination CCP-TP-500, CCP Remote-Handled Waste Visual Examination CCP-TP-163, CCP Evaluation of Waste Packaging Records for Visual Examination of Records	Debris (S5000)	YES	YES (Records only)
8RHVE2	Visual Examination of Newly Packaged RH Waste Drums CCP-TP-500, CCP Remote-Handled Waste Visual Examination	Debris (S5000)	YES	YES
N/A	Acceptable Knowledge CCP-TP-005, CCP Acceptable Knowledge Documentation	Debris (S5000)	YES	YES
N/A	Enhanced Acceptable Knowledge	Debris (S5000)	TBD	TBD
N/A	Certified Program Enhanced Chemical Compatibility Evaluation	Debris (S5000)	TBD	TBD
N/A	Basis of Knowledge Evaluating Oxidizing Chemicals in TRU Waste	Debris (S5000)	TBD	TBD
N/A	Certified Program Acceptable Knowledge Assessments	Debris (S5000)	TBD	TBD
N/A	Data Verification and Validation CCP-TP-001, CCP Project Level Data Validation and Verification CCP-TP-500, CCP Remote-Handled Waste Visual Examination CCP-TP-504, CCP Dose-to-Curie Survey Procedure for	Debris (S5000)	YES	YES

**Processes and Equipment to Be Evaluated During Audit A-17-25 of the ANL/CCP**

<b>WDS METHOD ID#</b>	<b>Process/Equipment Description</b>	<b>Applicable to the Following Summary Category Groups</b>	<b>Currently Approved by NMED</b>	<b>Currently Approved by EPA</b>
	Remote-Handled Transuranic Waste			
N/A	Quality Assurance	N/A	N/A	YES
N/A	WIPP Waste Information System (WWIS)/Waste Data System (WDS)	N/A	YES	YES