

## Allen, Pam, NMENV

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**From:** Biswell, David, NMENV  
**Sent:** Monday, February 05, 2018 9:00 AM  
**To:** Allen, Pam, NMENV  
**Cc:** Maestas, Ricardo, NMENV  
**Subject:** FW: Scope of ORNL CH and RH CC-2018 Final 1-24-2018  
**Attachments:** ORNL CH and RH CC-2018 Final 1-24-2018.pdf



-----Original Message-----

**From:** Maestas, Ricardo, NMENV  
**Sent:** Wednesday, January 24, 2018 9:04 AM  
**To:** Biswell, David, NMENV <David.Biswell@state.nm.us>; Tellez, Hernesto, NMENV <Hernesto.Tellez@state.nm.us>; McLean, Megan, NMENV <Megan.McLean@state.nm.us>  
**Cc:** Maestas, Ricardo, NMENV <Ricardo.Maestas@state.nm.us>  
**Subject:** FW: Scope of ORNL CH and RH CC-2018 Final 1-24-2018

FYI..

See the notice for an EPA inspection at ORNL.

EPA also performs their own inspections at generator sites, apart from the CBFO Audits..

-----Original Message-----

**From:** Feltcorn, Ed [mailto:Feltcorn.Ed@epa.gov]  
**Sent:** Wednesday, January 24, 2018 9:02 AM  
**To:** J. R. Stroble (j.r.stroble@cbfo.doe.gov) <j.r.stroble@cbfo.doe.gov>; Carver, Roy (Tom) - FedNet <tom.carver@cbfo.doe.gov>  
**Cc:** Castaneda, Norma - FedNet <norma.castaneda@cbfo.doe.gov>; Site Documents - DOE (Site.documents@wipp.ws) <Site.documents@wipp.ws>; Alton Harris <Alton.Harris@em.doe.gov>; 'betsy.forinash@em.doe.gov' <betsy.forinash@em.doe.gov>; Maestas, Ricardo, NMENV <Ricardo.Maestas@state.nm.us>; Richards, Jon M. <Richards.Jon@epa.gov>; Peake, Tom <Peake.Tom@epa.gov>; Lee, Raymond <Lee.Raymond@epa.gov>; Joglekar, Rajani <Joglekar.Rajani@epa.gov>; Ellis, Jerry <Ellis.Jerry@epa.gov>; Patrick Kelly <pkelly@scainc.com>; Kira Darlow (kdarlow@scainc.com) <kdarlow@scainc.com>  
**Subject:** Scope of ORNL CH and RH CC-2018 Final 1-24-2018

Please distribute further as needed.

Please note date of call, we can refine the time during an interface call.

Also note the document requests in the scope.

Ed Feltcorn  
703 508 4084  
202 343 9422

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**Scope of EPA's Continued Compliance Inspection of the Oak Ridge National Laboratory-  
Central Characterization Project at the Transuranic Waste Processing Center,  
Oak Ridge National Laboratory, Oak Ridge, Tennessee**

**Organizations Notified:** Department of Energy – Carlsbad Field Office (CBFO)  
New Mexico Environment Department (NMED)  
EPA Region IV

**Inspection Dates:** March 6–8, 2018

**Inspection Schedule:** Tuesday 8:00 am, Kick-off,  
Tuesday 8:30 am – 4:30 pm, Conduct Inspection  
Wednesday 8:00 am – 4:30 pm, Conduct Inspection  
Thursday 8:00 am – 2:30 pm, Conduct Inspection  
Thursday 4:00 pm, Close-out

**EPA Inspection Team:** Ed Felcorn, U.S. EPA Headquarters (Lead Inspector)  
Rajani Joglekar, U.S. EPA Headquarters  
Kira Darlow, EPA Contractor (SC&A)  
Patrick Kelly, EPA Contractor (SC&A)

**Inspection Scope:**

The EPA will conduct a continued compliance inspection of the ORNL-CCP waste characterization program for both contact-handled (CH) and remote-handled (RH) transuranic (TRU) waste intended for disposal at the Waste Isolation Pilot Plant (WIPP). This inspection will take place on site at the TWPC in Oak Ridge, Tennessee. The purpose of this inspection is to verify that specific elements of the ORNL-CCP TRU waste characterization program continue to be in compliance with the EPA's baseline approval. The scope of this inspection includes the following waste characterization elements:

- Acceptable knowledge (AK) for CH and RH wastes, sampled from all applicable Summary Category Groups including documents produced to comply with changes to CCP-TP-005, Revision 27 or later
- Nondestructive assay (NDA) for assaying CH TRU wastes, specifically the IQ3 and Mobile ISOCS Large Container Counter 2 (MILCC 2) NDA systems
- Neutron and gamma-based dose-to-curie (DTC) techniques for assaying RH TRU wastes
- Real-time radiography (RTR) for CH TRU wastes
- Visual examination (VE) for RH TRU wastes

EPA personnel will be present at ORNL and will direct all inspection-related activities performed by the EPA's support contractor, SC&A. In accordance with 40 CFR 194.8(b), the EPA Inspection Team will assess the adequacy, implementation and effectiveness of the technical processes that ORNL-CCP uses to characterize CH and RH TRU wastes intended for disposal at WIPP. The EPA Inspection Team will evaluate personnel qualifications/training by

review of records and conducting interviews, operating procedures, technical documents, records and measurement systems, as appropriate, to determine ORNL-CCP's compliance with the EPA-approved baseline conditions. To successfully determine ORNL's continued compliance for the waste characterization elements listed above, the EPA must observe the NDA, gamma and neutron DTC, VE and RTR processes and operations for CH and/or RH WIPP-bound TRU waste.

**Documents:**

The EPA requests that ORNL-CCP provide documents in the following areas listed below by February 14, 2018. Upon receiving the requested documents, the EPA will request additional documents and records for detailed review.

**Acceptable Knowledge:**

- A listing of CH and RH containers characterized since August 1, 2016, with waste stream identification. Previously, ORNL-CCP provided the CH portion of this information as a spreadsheet with the following column headings: CONTAINERID, WASTESTREAM, RTRBDRID, VEBDRID, NDABDRID. Providing the data in the same format for this request would be fine, but please also include any RH containers. The EPA will request additional AK records after receiving this list.

**Nondestructive Assay:**

- The current revision of the calibration documents for the IQ3 and MILCC2 NDA systems approved by the EPA. These include documentation of each system's calibration of record, calibration confirmations, calibration verifications, determination of lower limit of detection and total measurement uncertainty.
- A listing of current revisions of all calibration, operating, calculation, and data validation procedures.
- The number of calibration verifications or other evidence of instrument performance that ORNL conducted for the IQ3 and MILCC2 NDA systems since August 1, 2016. The EPA will request a sample of these to further evaluate during the inspection.
- A listing of all IQ3 and MILCC2 Batch Data Reports (BDRs) that ORNL-CCP has completed since August 1, 2016. Upon receiving the list of completed BDRs, the EPA will select several for a detailed review.
- A listing of containers of TRU wastes that were assayed on the IQ3 and MILCC NDA systems since August 1, 2016 that are available for re-assay. The EPA will select containers for replicate analyses from this list and will provide the number of containers to be re-assayed and their identification numbers to ORNL-CCP prior to the inspection.

**Dose-to-Curie:**

- A listing of all gamma and neutron detectors used for DTC since August 1, 2016, including objective evidence of each detector's calibration of record.
- A listing of all current revisions of all calibration, operating, calculation, and data validation procedures.
- A listing of all containers that have been characterized using gamma and/or neutron DTC since August 1, 2016, including a listing of all DTC BDRs. Upon receiving the list of completed BDRs, the EPA will select several for a detailed review.

**Real Time Radiography:**

- A listing of CH RTR BDRs completed since August 1, 2016.
- A listing of RTR Nonconformance Reports (NCRs) that ORNL-CCP generated since August 1, 2016.

**Visual Examination:**

- A listing of completed RH VE BDRs completed since August 1, 2016
- A listing of NCRs that ORNL-CCP generated for VE since August 1, 2016.

**Pre-Inspection Conference Call:**

EPA requests a conference call with ORNL-CCP personnel on February 21, 2018, at a mutually convenient time to be coordinated through CBFO.

**Inspection Logistics:**

A week before the inspection, EPA requests that CBFO/ORNL-CCP provide the location to be used for the inspection opening and closing meetings. EPA also requests that ORNL-CCP provide office space for the Inspection Team members to conduct interviews and review documents. The inspection logistics are as follows:

- The EPA Inspection Team Leader will conduct an opening meeting for the inspection with the appropriate personnel from CBFO, ORNL-CCP and their support contractors at 8:00 am on March 6, 2018.
- The EPA Inspection Team members will begin the inspection directly following the opening meeting.
- The EPA Inspection Team Leader will meet with the appropriate CBFO and ORNL-CCP personnel March 7 and 8, 2018, at 8:00 am for a daily briefing, as needed.
- The EPA Inspection Team members will stop inspecting at 2:30 pm on Thursday, March 8, 2018.

- An inspection close-out meeting will be held March 8, 2018, at 4:00 pm.

Please note that all dates and times listed above may be adjusted to accommodate personnel availability, logistical considerations or the inspection's progress, as required. If the EPA Inspection Team is able to complete all inspection aspects earlier than indicated above, the timing of the close-out meeting may change. CBFO QA is welcome to provide observers for the EPA inspection.