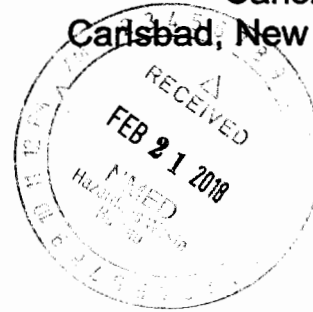


United States Government

ENTERED
Department of Energy

memorandumCarlsbad Field Office
Carlsbad, New Mexico 88221

DATE: **FEB 21 2018**
REPLY TO
ATTN OF: CBFO:OQA:MPN:JM:18-0970:UFC 2300.00
SUBJECT: Recertification Audit A-18-13 of the ORNL/CCP
TO: Laura Wilkerson, DOE-OR

Please be advised that an audit team from the U.S. Department of Energy Carlsbad Field Office (DOE/CBFO) will conduct Waste Isolation Pilot Plant Hazardous Waste Facility Permit (WIPP WAP) Attachment C6 Audit A-18-13 for recertification of the Oak Ridge National Laboratory and the Nuclear Waste Partnership LLC Central Characterization Program (ORNL/CCP) for conducting contact-handled (CH) and remote-handled (RH) transuranic waste characterization activities. The audit is scheduled for March 26 – 28, 2018, and will be conducted in accordance with the attached audit plan. The ORNL/CCP characterization activities for CH Summary Category Groups (SCGs) S4000 soils/gravel and S5000 debris wastes, and RH SCG S5000 debris wastes will be evaluated during the audit. In addition, the audit team will verify compliance with the Waste Isolation Pilot Plant Waste Acceptance Criteria (WIPP WAC). Representatives from DOE/CBFO and the New Mexico Environment Department may be present to observe the audit.

Your representatives are requested to coordinate with the audit team to provide access to ORNL/CCP facilities and to supply the necessary documentation and records for the audit team to conduct the audit. Please ensure availability of appropriate space for auditors to conduct meetings. Also, please arrange to have cognizant personnel available to support the audit.

If you have any questions or comments concerning the audit, please contact me at (575) 234-7483.


Martin P. Navarrete, Acting Director
Office of Quality Assurance

Attachment

180222



cc: w/attachment

J. Carswell, CBFO	*ED
D. Miehl, CBFO	ED
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J. R. Stroble, CBFO	ED
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J. Britain, NWP	ED
M. Percy, NWP/CCP	ED
R. Lee, NWP/CCP	ED
R. Reeves, NWP/CCP	ED
A. J. Fisher, NWP/CCP	ED
B. Pace, NWP/CCP	ED
C. Simmons, NWP/CCP	ED
J. Harvill, NWP/CCP	ED
J. Carter, NWP/CCP	ED
M. McDaniel, NWP/QA	ED
V. Ballew, NWP/QA	ED
S. Saiz, NWP/QA	ED
A. Boyea, NWP/QA	ED
J. Walsh, EPA	ED
J. Ellis, EPA	ED
T. Peake, EPA	ED
E. Feltcorn, EPA	ED
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J. Kieling, NMED	ED
R. Maestas, NMED	ED
D. Biswell, NMED	ED
H. Tellez, NMED	ED
M. McLean, NMED	ED
T. Runyon, CTAC	ED
P. Martinez, CTAC	ED
C. Castillo, CTAC	ED
M. Lerach, CTAC	ED
K. Gentry, CTAC	ED
D. Harvill, CTAC	ED
G. White, CTAC	ED
Site Documents	ED

CBFO QA File

CBFO M&RC

*ED denotes electronic distribution

**CARLSBAD FIELD OFFICE
AUDIT PLAN**

Audit Number: A-18-13

Organization to be Audited: Oak Ridge National Laboratory (ORNL), Nuclear Waste Partnership LLC (NWP) Central Characterization Program (CCP)

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

Date and Location: March 26 – 28, 2018
Oak Ridge, TN, and Carlsbad, NM

Audit Team:

Martin Navarrete	Carlsbad Field Office (CBFO) Office of Quality Assurance (QA) Representative
Micheal Stapleton	CBFO QA Representative
Katie Gentry	Audit Team Leader, CBFO Technical Assistance Contractor (CTAC)
Charlie Riggs	Auditor, CTAC (Program Status)
Jim Schuetz*	Auditor, CTAC (C6 QA)
Joe Lopez*	Auditor, CTAC (C6 QA)
Ricardo Chavez	Auditor, CTAC (AK)
Prissy Yanez	Auditor, CTAC (RTR)
Paul Gomez	Auditor, CTAC (NDA/DTC)
Matt Leroy	Auditor, CTAC (VE & Container Management)
Randy Fitzgerald	Technical Specialist, CTAC (AK)
Dick Blauvelt	Technical Specialist, CTAC (AK)
Dustin Stegman	Technical Specialist, CTAC (RTR)
Rhett Bradford	Technical Specialist, CTAC (VE)
Jim Vernon	Auditor/Technical Specialist, CTAC (PL V&V)
Michel Hall	Technical Specialist, CTAC (NDA/DTC)

* Indicates team members working at the Skeen-Whitlock Building in Carlsbad, NM.

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 ORNL for characterization of contact-handled (CH) Summary Category Groups (SCGs) S4000 soils/gravel and S5000 debris wastes, and remote-handled (RH) SCG S5000 debris wastes.

The audit team will also evaluate the Chemical Compatibility Evaluation Memorandums (CCEMs) for Waste Stream OR-REDC-CH-HET, *Waste Containers Repackaged at the TRU Waste Processing Center (TWPC)*, and Waste Stream OR-NFS-CH-HET-A, *Nuclear Fuel Services Heterogeneous Debris Stored at ORNL*.

The CCEMs are currently in the review process at CBFO and are expected to be completed prior to this audit.

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 ORNL/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 (Chapter 18), DOE/WIPP-07-3372*

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*
- *CCP/TRU Waste Processing Center/Oak Ridge National Laboratory Interface Document, CCP-PO-027*
- *Related NWP/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

- Nonconformances
- Personnel Qualification and Training

- Measuring and Test Equipment (M&TE)
- Software Version Installation
- Records

Technical Activities

- Project-level Data Validation and Verification (PLV&V)
- Enhanced Acceptable Knowledge (AK), including waste certification
 - Including, but not limited to, Enhanced CCEM, Basis of Knowledge, AK Assessments, AK Briefings, Interface Waste Management Documents List
- Real-time Radiography (RTR)
- Visual Examination (VE)
- Nondestructive Assay (NDA), including Performance Demonstration Program
- Dose-to-Curie (DTC)
- Container Management
- WIPP Waste Information System/Waste Data System (WWIS/WDS)
 - Including, but not limited to, Statistical Approach to Material at Risk

Schedule of Audit Activities:

A pre-audit conference is scheduled for Monday, March 26, 2018, at 8:30 a.m.

Audit team caucuses will be held at 3:30 p.m. on Monday and Tuesday, March 26 and 27, and at 1:30 p.m. on Wednesday, March 28, 2018.

If needed, the audit team leader will conduct a management briefing with appropriate ORNL and NWP/CCP management at 8:30 a.m. on Tuesday and Wednesday, March 27 and 28, 2018.

A post-audit conference is scheduled for Wednesday, March 28, 2018, at 2:00 p.m.

All meetings will take place at designated locations at the ORNL/TRU Waste Processing Center in Oak Ridge, TN, and at the Skeen-Whitlock Building in Carlsbad, NM.

Prepared by: Katie Gentry
Katie Gentry
CTAC Audit Team Leader

Date: 2/13/18

Concurrence: Martin Navarrete
Martin Navarrete, Acting Director
CBFO Office of Quality Assurance

Date: 2-13-18

WIPP #	Process/Equipment Description	Applicable to the Following Waste Streams/Groups of Waste Streams	Currently Approved by NMED	Currently Approved by EPA
PROCESSES OR EQUIPMENT TO BE EVALUATED FOR RECERTIFICATION				
16IQ1	Nondestructive Assay IQ3 Procedures – CCP-TP-046, CCP-TP-047, and CCP-TP-048	Soils (S4000) Debris (S5000)	N/A	YES
16MILCC2	Mobile ISOCs Large Container Counter (MILCC2) Procedures – CCP-TP-076, CCP-TP-077, and CCP-TP-048	Soils (S4000) Debris (S5000)	N/A	YES
16DTC1	Dose-to-Curie (Radiological Characterization) Procedure – CCP-TP-504	Debris (S5000) – RH	N/A	YES
16RR1	Real-Time Radiography Mobile Characterization System RTR #6 Procedures – CCP-TP-053 and CCP-TP-165	Soils (S4000) Debris (S5000)	YES	YES
16RHVE1	Visual Examination Procedure – CCP-TP-500	Debris (S5000) – RH	YES	YES
16VE1	Visual Examination Procedure – CCP-TP-113	Soils (S4000) Debris (S5000)	YES	YES
N/A	Acceptable Knowledge	Soils (S4000) Debris (S5000) Debris (S5000) – RH	YES	YES

WIPP #	Process/Equipment Description	Applicable to the Following Waste Streams/Groups of Waste Streams	Currently Approved by NMED	Currently Approved by EPA
N/A	Data Verification and Validation	Soils (S4000) Debris (S5000) Debris (S5000) – RH	YES	YES
N/A	Quality Assurance	Soils (S4000) Debris (S5000) Debris (S5000) – RH	YES	YES
N/A	WIPP Waste Information System (WWIS)/Waste Data System (WDS)	Soils (S4000) Debris (S5000) Debris (S5000) – RH	YES	YES