



From: Biswell, David, NMENV
Sent: Tuesday, June 19, 2018 7:51 AM
To: Allen, Pam, NMENV
Subject: FW: Scope of EPA evaluation of the LANL MILCC3 at TA 55 - June 12-13
Attachments: LANL-CCP T1 MILCC3 TA-55 Scope.pdf

From: Maestas, Ricardo, NMENV
Sent: Thursday, May 31, 2018 9:00 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>; Maestas, Ricardo, NMENV <Ricardo.Maestas@state.nm.us>
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Subject: FW: Scope of EPA evaluation of the LANL MILCC3 at TA 55 - June 12-13

Fyi..

From: Feltcorn, Ed [<mailto:Feltcorn.Ed@epa.gov>]
Sent: Tuesday, May 29, 2018 7:21 AM
To: Cruickshank, Herbert (Herb) - FedNet <herb.cruickshank@cbfo.doe.gov>
Cc: Alton Harris <Alton.Harris@em.doe.gov>; 'julia.shenk@em.doe.gov' <julia.shenk@em.doe.gov>; 'edgard.espinosa@hq.doe.gov' <edgard.espinosa@hq.doe.gov>; Princen, Kenneth - FedNet <kenneth.princen@cbfo.doe.gov>; Fesmire, Courtland <courtland.fesmire@cbfo.doe.gov>; Castaneda, Norma - FedNet <norma.castaneda@cbfo.doe.gov>; Site Documents - DOE (Site.documents@wipp.ws) <Site.documents@wipp.ws>; Soaterna, Carolina - NWP <carolina.soaterna@wipp.ws>; Peake, Tom <Peake.Tom@epa.gov>; Ellis, Jerry <Ellis.Jerry@epa.gov>; Patrick Kelly <pkelly@scainc.com>; Stone, Nick <stone.nick@epa.gov>; Maestas, Ricardo, NMENV <Ricardo.Maestas@state.nm.us>
Subject: Scope of EPA evaluation of the LANL MILCC3 at TA 55 - June 12-13

Jerry Ellis is out today so I am sending the scope on his behalf.

We would like to emphasize the need for smooth entry to the site and TA 55 through security and also the need to receive the documents as early as possible.

Thanks

Ed Feltcorn (for Jerry Ellis)



**Scope of EPA's Tier 1 Change Evaluation at LANL-CCP:
Non-Destructive Assay – Mobile ISOCS Large Container Counter 3 (MILCC3)**

DOE Site: Los Alamos National Laboratory – Central Characterization Program (LANL-CCP)

Organizations Notified: Department of Energy – Carlsbad Field Office (CBFO)
New Mexico Environment Department (NMED)
Environmental Protection Agency (EPA) – Region 6

Evaluation Dates: June 12-13, 2018

Inspection Schedule: Tuesday 8:00 am – 8:30 am, Entrance Meeting*
Tuesday 8:30 am – 4:00 pm, Conduct Evaluation
Wednesday 8:00 am – Management Briefing, as needed*
Wednesday 8:30 am – 2:00 pm, Conduct Evaluations
Wednesday 3:00 pm – Close-Out Meeting*

* With LANL-CCP Management and technical leads

EPA Inspection Team: Jerry Ellis, US EPA HQ (Lead Evaluator)
Edward Feltcorn, US EPA HQ
Patrick Kelly, EPA Contractor, Technical Lead (SC&A)

Evaluation Scope:

EPA will conduct a Tier 1 evaluation in accordance with 40 CFR 194.8(b) to evaluate the adequacy, implementation, and effectiveness of technical processes implemented by LANL-CCP for using the MILCC3 Nondestructive Assay (NDA) system located at Technical Area-55 (TA-55) for characterizing containerized CH TRU wastes.

Characterization Systems To Be Inspected:

On June 12-13, 2018, the EPA will evaluate the MILCC3 proposed for use under LANL CCP's CH waste characterization program under the inspection authority described in 40 CFR 194.8(b). The EPA evaluation includes observation of the system's operation, (by review of records and conducting interviews to evaluate personnel qualifications/training, operating procedures, and LANL-CCP performance tests of equipment to determine regulatory compliance and assess the technical adequacy of the MILCC3.

Additional Documents:

EPA requests that the documents listed below be provided prior to beginning the evaluation:

- A list of MILCC3 Batch Data Reports (BDRs) that have been promoted through project level review or that have been generated to demonstrate the MILCC3 NDA process

- A list of qualified personnel (operators and subject matter experts) and training/qualification packages for all NDA (current List of Qualified Individuals or LOQI)
- Current revision of the formal CCP operating procedures for calibrating and operating the MILCC3, and conducting review and validation of MILCC3 data
- A copy of the formal documents that present the technical basis and results of the MILCC3 calibration, calibration confirmation, determination of the system's Total Measurement Uncertainty and Lower Limit of Detection, and any other performance tests that support the MILCC3 use to assay CH TRU wastes.

In addition, the EPA requests to witness a demonstration of the MILCC3 assaying at least one container during the on-site evaluation. The EPA may select a small sample of each type of previously-assayed containers to be re-assayed for replicate analysis and evaluation.

Inspection Logistics:

A week before the evaluation, LANL-CCP must inform the EPA of the location to be used for the following meetings and activities:

- The EPA Evaluation Team will meet with the appropriate LANL-CCP management at 8:00 am on June 12, 2018 for an opening meeting on site at LANL.
- The EPA expects to view operation of the MILCC3 at TA-55 on Tuesday, June 12, 2018, according to the site's scheduling. Observation of the system at TA-55 is an essential part of this evaluation, however, the EPA Evaluation Team is flexible regarding the scheduling of this aspect.
- In addition to observing the MILCC3 in operation at TA-55, the EPA Evaluation Team will review documents and conduct interviews with LANL-CCP NDA personnel, which may be conducted off-site, if desired.
- The EPA Evaluation Team Leader will meet with the appropriate LANL-CCP management on June 13, 2018 at 8:00 am, as necessary.
- A post-evaluation EPA briefing for the appropriate LANL-CCP management will be held on June 13, 2018 at approximately 3:00 pm.

The EPA requests that CBFO or LANL-CCP facilitate unfettered access to all areas and information required to conduct this evaluation on site at LANL. EPA also requests information regarding any required personnel protective equipment for the inspection team. CBFO QA is welcome to provide observers for this EPA evaluation.