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Department of Energy
 Carlsbad Field Office
 P. O. Box 3090
 Carlsbad, New Mexico 88221
JUN 26 2018



Mr. John 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-18-17 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-18-17, Argonne National Laboratory 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 Argonne National Laboratory in Argonne, IL, July 31 – August 2, 2018. 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 fine and imprisonment for knowing violations.

Should you have any questions concerning this notification, please contact Martin Navarrete, Acting Director for CBFO Office of Quality Assurance at (575) 234-7483.

Sincerely,

Todd Shrader
 Todd Shrader, Manager
 Carlsbad Field Office

Enclosure

cc: w/enclosure

- | | | | |
|--------------------|------|-------------------------------------|----|
| R. Murray, EM-43 | * ED | T. Runyon, CTAC | ED |
| J. Carswell, CBFO | ED | P. Martinez, CTAC | ED |
| C. Gadbury, CBFO | ED | M. Leroch, CTAC | ED |
| M. Brown, CBFO | ED | C. Castillo, CTAC | ED |
| C. Gadbury, CBFO | ED | K. Gentry, CTAC | ED |
| M. Navarrete, CBFO | ED | D. Harvill, CTAC | ED |
| D. Miehl, CBFO | ED | G. White, CTAC | ED |
| M. Stapleton, CBFO | ED | A. Urquidez, RES | ED |
| N. Castaneda, CBFO | ED | J. Haschets, RES | ED |
| T. Carver, CBFO | ED | R. Chavez, RES | ED |
| R. Maestas, NMED | ED | CBFO QA File | |
| D. Biswell, NMED | ED | CBFO M&RC | |
| H. Tellez, NMED | ED | *ED denotes electronic distribution | |
| M. McLean, NMED | ED | | |



**CARLSBAD FIELD OFFICE
AUDIT PLAN**

Audit Number: A-18-17

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

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

Date and Location: July 31 – August 2, 2018
Argonne, IL, 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)
Cindi Castillo	Auditor, CTAC (Program Status)
Ricardo Chavez**	Auditor, CTAC (AK)
Joe Lopez	Auditor, CTAC (DTC & DM)
Dustin Stegman*	Auditor, CTAC (C6 QA)
B. J. Verret	Auditor, CTAC (Container Management/Shielded Container Assembly Loading)
Dick Blauvelt**	Technical Specialist, CTAC (AK)
Michel Hall	Technical Specialist, CTAC (NDA/DTC)
Rick Castillo	Auditor/Technical Specialist, CTAC (VE)
Jim Vernon**	Auditor/Technical Specialist, CTAC (PL V&V)

* Indicates team members working at the Skeen-Whitlock Building in Carlsbad, NM.
** Indicates team members working via 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 (SCG) S5000 debris wastes.

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 (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/ANL RH-TRU Waste Interface Document, CCP-PO-500*
- *Related NWP/CCP QA and technical implementing procedures*

Activities to be Audited:

Quality Assurance

- Results of Previous Audits
- Changes in Programs or Operations
- New Programs or Activities Being Implemented
- Changes in Key Personnel
- Container Management
- Shielded Container Assembly Loading

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

- Acceptable Knowledge (AK), including waste certification and AK Assessments
- Dimensional Measurement (DM)
- Dose-to-Curie (DTC)
- Project-level Data Validation and Verification (PLV&V)
- Visual Examination (VE)
- 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 Tuesday, July 31, 2018, at 9:00 a.m. CDT.

Audit team caucuses will be held at 3:30 p.m. CDT on Tuesday and Wednesday, July 31 and August 1, and 11:00 a.m. on Thursday, August 2, 2018.

If needed, the audit team leader will conduct a management briefing with appropriate ANL and NWP/CCP management at 8:30 a.m. CDT on Wednesday and Thursday, August 1 and 2, 2018.

A post-audit conference is scheduled for Thursday, August 2, 2018, at 12:00 p.m. CDT.

All meetings will take place at designated locations at the ANL and at the Skeen-Whitlock Building in Carlsbad, NM, as indicated on the daily schedule.

Prepared by: Katie Gentry
Katie Gentry
CTAC Audit Team Leader

Date: 6/18/18

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

Date: 6-21-18

Table 1 ANL-CCP RH WIPP Certified Program Waste Characterization Processes To Be Audited RH S5000 AERHDM Debris
Acceptable Knowledge (AKSR CCP-AK-ANLE-500, Rev. 13)
Certified Program Acceptable Knowledge Assessment (AKA001) dated December 12, 2016
Data Generation and Project Level Validation & Verification
Visual Examination WIPP # 8RHVE1 WIPP # 8RHVE2 for Newly Packaged RH Drums
Dose-to-Curie WIPP # 8DTC1
Dimensional/Gravimetric (DG) Measurement WIPP # 8RHGM1
WIPP Waste Information System/Waste Data System
Permit Requirement: <ul style="list-style-type: none"> - Per the <i>WIPP Hazardous Waste Facility Permit Waste Analysis Plan</i>; Section C6-3, Audit Position Functions, "Audits will be conducted at least annually for each site involved in the waste characterization program". - NTP will request a follow-up surveillance for characterization/transportation activities that are not requested under this scope.
EPA Approvals: <ul style="list-style-type: none"> - Tier 1 approval adding 100 drums of AGHCF debris waste to waste stream AERHDM dated October 2008, A-98-49; II-A4-136. - Tier 1 approval adding K-Wing debris to waste stream AERHDM dated September 2010, A-98-49; II-A4-132. - Tier 1 approval adding 120 containers of AGHCF debris waste to waste stream AERHDM dated September 2010, A-98-49; II-A4-134. - Tier 1 approval adding AGHCF fuel pin FEW in waste stream AERHDM dated November 2010, A-98-49; II-A4-140. - Tier 1 approval adding K-Wing FEW to waste stream AERHDM dated February 2012, A-98-49; II-A4-158. - Tier 1 approval adding K-Wing Solidified Liquid Waste to waste stream AERHDM dated June 2012, A-98-49; II-A4-162. - Tier 1 approval adding AGHCF RERTR FEW and second batch of Fuel Pin FEW dated October 2012, A-98-49; II-A4-167. - EPA letter dated September 2013, found the DOE met the goal of shipping due to measurement uncertainty by combining multiple measurements and shielding calculations. - Tier 1 approval adding 5 containers to the AERHDM waste stream dated March 2014, A-98-49; II-A4-181.

(Table provided with CBFO:ONTP:KEP:PG:18-0697:UFC 5900.00, Notification of Readiness for the Certification Start-up Activities of the Argonne National Laboratory-Central Characterization Program Memorandum, dated 06/15/2018).