



United States Government

NOV - 7 2018

Department of Energy

# memorandum

Carlsbad Field Office  
Carlsbad, New Mexico 88221

DATE: NOV 07 2018

REPLY TO  
ATTN OF: CBFO:OQA:DSM:JM:18-2503: UFC 2300.00

SUBJECT: Notification and Audit Plan for CBFO A-19-06, Idaho National Laboratory Central Characterization Program Recertification Audit

TO: Jim Malmø, DOE-ID

Please be advised that a team of auditors and technical specialists from the U.S. Department of Energy (DOE) Carlsbad Field Office (CBFO) will conduct Audit A-19-06 at the Idaho National Laboratory/Central Characterization Program (INL/CCP) facilities near Idaho Falls, ID and at the Skeen-Whitlock Building in Carlsbad, NM on December 17 – 19, 2018. The audit will be conducted in accordance with the attached audit plan.

The purpose of the audit is to determine whether INL/CCP waste characterization activities should be recertified by CBFO for waste destined for disposal at the Waste Isolation Pilot Plant. The contact-handled (CH) S3000 (homogeneous solids), S4000 (soils) and S5000 (debris) will also be audited specifically for the enhanced Acceptable Knowledge (AK) process related to the INL-CCP CH inventory of previously certified waste containers. Flammable Gas Analysis and Gas Generation Testing will also be evaluated during this audit.

Representatives from the 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 develop the necessary documentation for the audit team to gain access to the INL/CCP facilities, conduct the audit, and have appropriate access to necessary documentation and records. Please provide meeting rooms for the entrance and exit meetings, and work rooms for the audit team and observers. The audit team will need a full set of documentation applicable to the INL/CCP characterization activities for waste to be transported to the Waste Isolation Pilot Plant.

If you have any questions concerning the audit, please contact me at (575) 234-7491.

Dennis S. Miehls  
Senior Quality Assurance Specialist

Attachment

181105



cc: w/attachment	
R. Murray, EM	ED
T. Shrader, CBFO	ED
K. Princen, CBFO	ED
D. Gadbury, CBFO	ED
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J. Walsh, EPA	ED
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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-19-06

**Organization to be Audited** Idaho National Laboratory (INL) Nuclear Waste Partnership LLC (NWP) Central Characterization Program (CCP)

**Organizations to be Notified:** Nuclear Waste Partnership LLC (NWP)  
U.S. Department of Energy – Idaho Operations Office (DOE-ID)  
New Mexico Environment Department (NMED)  
U.S. Environmental Protection Agency (EPA)  
Fluor Idaho

**Date and Location:** December 17 – 19, 2018  
Idaho Falls, ID, and Carlsbad, NM

**Audit Team:**

Dennis Miehls	Carlsbad Field Office (CBFO) Office of Quality Assurance (QA) Management Representative
Jim Vernon*	Audit Team Leader, CBFO Technical Assistance Contractor (CTAC), Auditor (Interface, Transportation)
Ricardo Chavez	Auditor, CTAC (AK)
Dick Blauvelt*	Technical Specialist, CTAC (AK)
Randy Fitzgerald*	Technical Specialist, CTAC (AK)
Joe Lopez	Technical Specialist, CTAC (WWIS/WDS, Software Quality Assurance [SQA])

\*Indicates team member working via teleconference.

**Audit Scope:**

The audit team will evaluate the adequacy, implementation, and effectiveness of the INL-CCP waste characterization processes for contact-handled (CH) Summary Category Groups (SCGs) S3000 homogeneous solids waste, S4000 soils/gravel, and S5000 debris waste. Technical and Quality Assurance (QA) requirements specific to the enhanced Acceptable Knowledge (AK) process in accordance with DOE/WIPP-02-3122, *Transuranic Waste Acceptance Criteria for the Waste Isolation Pilot Plant* (WAC) Appendix H and I will be audited. CH SCGs S3000, S4000 and S5000 will also be audited specifically for the processes listed on Attachment 1 of this plan. This audit will be conducted to recertify the INL-CCP CH waste program.

**Governing Documents/Requirements:**

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

- DOE/CBFO-94-1012, *Quality Assurance Program Document*
- Waste Isolation Pilot Plant Hazardous Waste Facility Permit NM4890139088-TSDF
- DOE/WIPP-02-3122, *Transuranic Waste Acceptance Criteria for the Waste Isolation Pilot Plant*

- DOE/WIPP-07-3372, *Waste Isolation Pilot Plant Documented Safety Analysis* (Chapter 18)

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

- CCP-PO-001, *CCP Transuranic Waste Characterization Quality Assurance Project Plan*
- CCP-PO-002, *CCP Transuranic Waste Certification Plan*
- CCP-PO-003, *CCP Transuranic Authorized Methods for Payload Control (CCP CH-TRAMPAC)*
- CCP-PO-024, *CCP/INL Interface Document*
- Related INL-CCP QA and technical implementing procedures

**Activities to be Audited:**

General

- INL-CCP Interface

Technical Activities

- AK, including waste certification
  - Including, but not limited to, Chemical Compatibility Evaluation Memorandum, Basis of Knowledge, AK Assessments, AK Briefings, Interface Waste Management Documents List
- Transportation including Flammable Gas Analysis (FGA) and Gas Generation Testing (GGT)
- WIPP Waste Information System/Waste Data System (WWIS/WDS)

**Schedule of Audit Activities:**

A pre-audit conference is scheduled for 9:00 a.m. on Monday, December 17, 2018, at the Skeen-Whitlock Building, conference room T-224.


Audit team caucuses will be held at 3:00 p.m. on Monday and Tuesday, December 17 and 18, and at 1:00 p.m. on Wednesday, December 19, 2018, at the Skeen-Whitlock Building, conference room T-224.

If needed, the audit team leader will conduct a management briefing with appropriate NWP CCP Management at 8:30 a.m. on Tuesday and Wednesday, December 18 and 19, 2018, at the Skeen-Whitlock Building, conference room T-224.


A post-audit conference is scheduled for 2:00 p.m. on Wednesday, December 19, 2018, at the Skeen-Whitlock Building, conference room T-224.

Audit activities will be conducted in Carlsbad, New Mexico and Idaho Falls, Idaho.

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Approved By:   
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Jim Vernon, CTAC  
Audit Team Leader

Date: 10-24-18

Approved By:  FOR  
\_\_\_\_\_  
Donald C. Gadbury, Director  
CBFO Office of Quality Assurance

Date: 10-25-18

<b>CENTRAL CHARACTERIZATION PROGRAM at Idaho National Laboratory</b>					
<b>List of Process/Equipment Certified from Table's 1 and 2 of this Memorandum to Be Audited</b>					
WDS Method ID#	Site Equipment # or Title	Description	Components	Software	NDA and TMU
<b>Gas Generation Testing (GGT)</b>					
14GG1	Gas Generation Testing	Gas Generating Testing, 55 gallon drums  CCP-TP-083	• MGSS Unit/Cart 1 (GC-14B)	N/A	N/A
14GG2	Z-211-103	Gas Generating Testing, 55 gallon drums  CCP-TP-083	• MGSS Unit/Cart 2 (GC-14B)	N/A	N/A
<b>Flammable Gas Analysis (FGA)</b>					
N/A	N/A	Headspace Gas Sampling and Analysis DOE/WIPP-06-3345	GC/MS #9 and #10	N/A	N/A