



From: Maestas, Ricardo, NMENV
Sent: Wednesday, February 06, 2019 8:32 AM
To: Allen, Pam, NMENV
Subject: FW: Scope for EPA Inspection of the RMAL at Oak Ridge - January 2019
Attachments: RMAL Scope for January 2019 12-07-18 final.pdf

From: Feltcorn, Ed <Feltcorn.Ed@epa.gov>
Sent: Friday, December 07, 2018 6:57 AM
To: Tom Carver <Tom.Carver@cbfo.doe.gov>; Norma Castaneda <norma.castaneda@cbfo.doe.gov>
Cc: Maestas, Ricardo, NMENV <Ricardo.Maestas@state.nm.us>; Peake, Tom <Peake.Tom@epa.gov>; Ellis, Jerry <Ellis.Jerry@epa.gov>; Santillan, Eugenio-Felipe <santillan.eugenio-felipe@epa.gov>; Site Documents - DOE <site.documents@wipp.ws>; Patrick Kelly <pkelly@scainc.com>; Kira Darlow <kdarlow@scainc.com>
Subject: [EXT] Scope for EPA Inspection of the RMAL at Oak Ridge - January 2019

Please pass to Lab personnel.

Note the request for a call preferably January 8 or 9.

Ed

181203



Scope of the EPA's Inspection of the Oak Ridge Radioactive Materials Analytical Laboratory, Located at the Oak Ridge National Laboratory, Oak Ridge, TN

Organizations Notified: Department of Energy – Carlsbad Field Office (CBFO)
New Mexico Environment Department

Inspection Dates: January 14–17, 2019

Inspection Schedule: Monday 8:00 am – Kick-off meeting
Monday 8:30 am – 4:30 pm, Conduct Inspection
Tuesday 8:00 am – 4:30 pm, Conduct Inspection
Wednesday 8:00 am – 4:30 pm, Conduct Inspection
Thursday 8:00 am – 11:00 am, Conduct Inspection
Thursday 12:00 pm – Close-out meeting

EPA Inspection Team: Ed Felcorn, US EPA HQ, Inspection Lead
Jerry Ellis, US EPA HQ, Inspector
Patrick Kelly, EPA Contractor (SC&A)
Kira Darlow, EPA Contractor (SC&A)
Dr. Jay Santillan, US EPA HQ, Observer

Inspection Scope:

As part of transuranic (TRU) waste characterization performed prior to disposal of waste at the Waste Isolation Pilot Plant (WIPP), certain remote-handled (RH) TRU wastes require quantification of specific radionuclides using laboratory methods. The Oak Ridge Radioactive Materials Analytical Laboratory (RMAL) is located at the Oak Ridge National Laboratory (ORNL) and is scheduled to analyze RH TRU wastes from ORNL. Before the EPA can approve these RH TRU wastes, the EPA will perform an inspection to determine if the analytical practices and the radiological data generated are adequate to support the EPA's approval of proposed RH Tier 1 changes based on the ORNL RMAL data.

The EPA Inspection Team will evaluate the radiometric and spectrometric laboratory operations implemented to assay RH TRU wastes. These evaluations will be in accordance with 40 CFR 194.8(b) and will assess the adequacy, implementation, and effectiveness of technical and quality processes implemented by the ORNL RMAL in support of characterizing waste intended for disposal at the WIPP.

Characterization Systems to be Inspected:

On January 14–17, 2019, the EPA will evaluate ORNL RMAL personnel, processes and equipment that are used to measure specific radionuclides in TRU wastes under the EPA's inspection authority described in 40 CFR 194.8(b). The EPA inspection includes evaluation of personnel qualifications/training (by review of records and conducting interviews); laboratory chain of custody and sample control; quality assurance/quality control records; laboratory certification(s); records of the laboratory's participation in third-party performance testing; radiometric and spectrometric instrument calibration, performance evaluations and control; pedigree of standard reference materials; data calculation and validation protocols; non-conformance procedures; sample preparation and radiochemical procedures; and records of

method qualifications. The data generated by the ORNL RMAL have been or will be used to quantify radionuclide contents of RH TRU wastes to support the development of radionuclide scaling factors for wastes intended for disposal at the WIPP repository near Carlsbad, NM.

The EPA understands that some of the samples may require initial handling or preparation in the Transuranium Analytical Laboratory (TAL), due to their elevated external exposure rates. Accordingly, this inspection will include specific aspects of TAL operations, as appropriate.

Documents:

The EPA Inspection Team relies on ORNL RMAL documents to prepare inspection checklists. Some documents have been provided previously and are in initial review. Based on the analytical processes that the ORNL RMAL will use to support the characterization of RH TRU wastes, the EPA requested specific additional documents during a teleconference that the EPA, ORNL RMAL, CCP and CBFO personnel conducted on December 6, 2018. At this time, the EPA does not anticipate needing additional documents before the inspection. However, based on the EPA's limited review to date, there may also be additional procedures, laboratory notebooks or other types of records that will be requested on the first day of the inspection. Additionally, it is safe to assume that the EPA will request additional information of several types during the inspection.

Pre-Inspection Conference Call:

The EPA requests a conference call to discuss inspection logistics with ORNL RMAL personnel during the week of January 7, 2019, at a mutually convenient time to be coordinated through CBFO.

Inspection Logistics:

A week before the inspection, the EPA requests that CBFO/ORNL RMAL provide the location to be used for the inspection opening and closing meetings. The EPA also requests that ORNL RMAL provide office space for the EPA Inspection Team members to conduct interviews and review documents. It appears that the EPA Inspection Team members will need access to the RMAL and possibly the TAL. The EPA requests that CBFO/ORNL RMAL personnel secure the appropriate access to these areas for the EPA Inspection Team members and identify any information needed for personnel access.

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 RMAL and their support contractors at 8:00 am on January 14, 2019.
- The EPA Inspection Team members will conduct the inspection from 8:30 am to 4:30 pm on Monday, January 14, 2019, and from 8:00 am to 4:30 pm on Tuesday, January 15, 2019, and Wednesday, January 16, 2019.
- The details of the daily schedule of the inspection will be developed following the opening meeting and are subject to change. The EPA will keep CBFO/ORNL RMAL personnel abreast of all daily schedule changes in as close to a real-time manner as possible.

- The EPA Inspection Team members will stop inspecting no later than 11:00 am on Thursday, January 17, 2019.
- An inspection close-out meeting will be held Thursday, January 17, 2019 at 12:00 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 elements earlier than indicated above, the timing of the close-out meeting may change. CBFO QA is welcome to provide observers for the EPA inspection.