



 **ENTERED**

Department of Energy
Carlsbad Field Office
P. O. Box 3090
Carlsbad, New Mexico 88221
MAR 12 2019



Mr. John E. Kieling, Chief
Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505-6303

Subject: Transmittal of the Hazardous Waste Facility Permit Attachment C6 Audit Plan and Notification of Assigned Auditors for CBFO Recertification Audit A-19-16 of the Oak Ridge National Laboratory Central Characterization Program

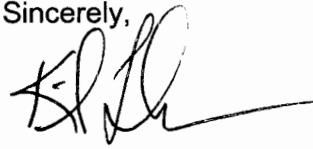
Dear Mr. Kieling:

This letter transmits the audit plan for Carlsbad Field Office (CBFO) Recertification Audit A-19-16 of the Oak Ridge National Laboratory (ORNL) Central Characterization Program for transuranic waste characterization activities. The audit will be conducted as required by the Waste Isolation Pilot Plant Hazardous Waste Facility Permit at the ORNL in Oak Ridge, TN, and at the Skeen-Whitlock Building in Carlsbad, NM, April 23 – 25, 2019. 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 Mr. Martin Navarrete, Senior Quality Assurance Specialist, at (575) 234-7483.

Sincerely,


for

Todd Shrader, Manager
Carlsbad Field Office

Enclosure



cc: w/enclosure
R. Murray, EM * ED
K. Lachman, CBFO ED
D. C. Gadbury, CBFO ED
C. Fesmire, CBFO ED
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Site Documents ED
WDS ED
CBFO QA File
CBFO M&RC
*ED denotes electronic distribution

**CARLSBAD FIELD OFFICE
AUDIT PLAN**

Audit Number: A-19-16

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 (EPA)

Date and Location: April 23 – 25, 2019
Oak Ridge, TN, and Carlsbad, NM

Audit Team:

Martin Navarrete	Carlsbad Field Office (CBFO) Office of Quality Assurance (QA) Management Representative
Micheal Stapleton	CBFO QA Representative
Katie Gentry	Audit Team Leader, CBFO Technical Assistance Contractor (CTAC)
Dustin Stegman	Audit Team Leader-in-Training, CTAC
Tim Boswell	Auditor, CTAC (VE)
Cindi Castillo	Auditor, CTAC (NDA/DTC)
Rick Castillo*	Auditor, CTAC (C6 QA)
Ricardo Chavez	Auditor, CTAC (AK)
Joe Lopez	Auditor, CTAC (RTR)
Bob Prentiss*	Auditor, CTAC (C6 QA)
Charlie Riggs	Auditor, CTAC (Program Status)
Ernie Tellez	Auditor-in-Training, CTAC (NDA/DTC)
Dick Blauvelt	Technical Specialist, CTAC (AK)
Rhett Bradford	Technical Specialist, CTAC (VE)
Randy Fitzgerald	Technical Specialist, CTAC (AK)
Jim Oliver	Technical Specialist, CTAC (NDA/DTC)
Prissy Yanez	Technical Specialist, CTAC (RTR)
Paul Gomez	Auditor/Technical Specialist, CTAC (PL V&V)
B. J. Verret	Auditor/Technical Specialist, CTAC (FGA/CM)

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

Audit Scope:

The audit team will evaluate the 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) SCGs S4000 soils/gravel and S5000 debris wastes.

The audit team will also evaluate completed documentation related to ORNL/CCP waste stream OR-ISTP-CH-HET, *ORNL Isotopes Programs Heterogeneous Debris Waste*. In addition, containers from waste stream, OR-WIA-RH-SOIL, will be evaluated during the audit. Transportation activities, including Flammable Gas Analysis, will be included in the scope of 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)
- Acceptable Knowledge (AK)
- Visual Examination (VE)
- Nondestructive Assay (NDA), including Performance Demonstration Program
- Dose-to-Curie (DTC)
- Container Management
- Flammable Gas Analysis (FGA)
- WIPP Waste Information System/Waste Data System (WWIS/WDS)

Schedule of Audit Activities:

A pre-audit conference is scheduled for Tuesday, April 23, 2019, at 8:30 a.m.

If needed, the audit team leader will conduct a management briefing with appropriate ORNL and NWP/CCP management at 8:30 a.m. on Wednesday and Thursday, April 24 and 25, 2019.

A post-audit conference is scheduled for Thursday, April 25, 2019, 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: 3/7/2019

Concurrence: Donald C. Gadbury
Donald C. Gadbury, Director
CBFO Office of Quality Assurance

Date: 3-11-19

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
		*Soils (S4000) – RH	NO	NO
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
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

*New process to be evaluated at TWPC.