DATE: MAR 12 2019
REPLY TO: CBFO:OQA:MPN:JM:19-0805:UFC 2300.00
SUBJECT: Recertification Audit A-19-16 of the ORNUCCP
TO: Laura Wilkerson, DOE-OR

Please be advised that an audit team from the U.S. Department of Energy Carlsbad Field Office (DOE/CBFO) will conduct Waste Isolation Pilot Plant (WIPP) Hazardous Waste Facility Permit Attachment C6 Audit A-19-16 for recertification of the Oak Ridge National Laboratory and the Nuclear Waste Partnership LLC Central Characterization Program (ORNUCCP) for conducting contact-handled (CH) and remote-handled (RH) transuranic waste characterization activities. The audit is scheduled for April 23 – 25, 2019, and will be conducted in accordance with the attached audit plan. The ORNUCCP characterization activities for CH Summary Category Groups (SCGs) S4000 soils/gravel and S5000 debris wastes, and RH SCGs S4000 soils/gravel and S5000 debris wastes will be evaluated during the audit. In addition, the audit team will verify compliance with the WIPP Waste Acceptance Criteria. Representatives from 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 provide access to ORNUCCP facilities and to supply the necessary documentation and records for the audit team to conduct the audit. Please ensure availability of appropriate space for auditors to conduct meetings. Also, please arrange to have cognizant personnel available to support the audit.

If you have any questions or comments concerning the audit, please contact me at (575) 234-7483.

[Signature]
Martin P. Navarrete
Senior Quality Assurance Specialist

Attachment
cc: w/attachment
R. Murray, EM
K. Lachman, CBFO
D. C. Gadbury, CBFO
C. Fesmire, CBFO
H. Cruickshank, CBFO
M. Brown, CBFO
D. Miehls, CBFO
M. Navarrete, CBFO
M. Stapleton, CBFO
N. Castaneda, CBFO
T. Carver, CBFO
B. Covert, NWP
S. Strong, NWP
D. Ivey, NWP
A. Boyea, NWP
M. Pearcy, NWP
V. Ballew, NWP
S. Saiz, NWP
R. Lee, NWP
R. Reeves, NWP
C. Simmons, NWP
J. Harvill, NWP
R. Martin, NWP
J. Carter, NWP
M. Ramirez, NWP
J. Ellis, EPA
T. Peake, EPA
E. Feltcorn, EPA
R. Maestas, NMED
D. Biswell, NMED
M. McLean, NMED
T. Runyon, CTAC
P. Martinez, CTAC
H. Tellez, CTAC
C. Castillo, CTAC
K. Gentry, CTAC
D. Harvill, CTAC
G. White, CTAC
A. Urquidez, RES
J. Haschets, RES
R. Chavez, RES
Site Documents
WDS
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
Michael 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)
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 NM4990139088-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 (PL/V&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: [Signature]
Katie Gentry
CTAC Audit Team Leader

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

Date: 3/7/2019

Date: 3-11-19
<table>
<thead>
<tr>
<th>WIPP #</th>
<th>Process / Equipment Description</th>
<th>Applicable to the Following Waste Streams / Groups of Waste Systems</th>
<th>Currently Approved by NMED</th>
<th>Currently Approved by EPA</th>
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<tr>
<td>16IQ1</td>
<td>Nondestructive Assay IQ3 Procedures - CCP-TP-046, CCP-TP-047, and CCP-TP-048</td>
<td>Soil (S4000) Debris (S5000)</td>
<td>N/A</td>
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<td></td>
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<tr>
<td>16MILC2</td>
<td>Mobile IQCs Large Container Counter (MILC2) Procedures - CCP-TP-076, CCP-TP-077, and CCP-TP-048</td>
<td>Soil (S4000) Debris (S5000)</td>
<td>N/A</td>
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<td>16DTC1</td>
<td>Dose-to-Curie (Radiological Characterization) Procedure - CCP-TP-504</td>
<td>Debris (S5000) - RH</td>
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<td>16PR1</td>
<td>Real-Time Radiography Mobile Characterization System RTR 98 Procedures - CCP-TP-053 and CCP-TP-185</td>
<td>*Soil (S4000) - RH</td>
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<td>YES</td>
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<td>16RVE1</td>
<td>Visual Examination Procedure - CCP-TP-500</td>
<td>Debris (S5000) - RH</td>
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<td>16VIE1</td>
<td>Visual Examination Procedure - CCP-TP-113</td>
<td>Soil (S4000) Debris (S5000)</td>
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<td>N/A</td>
<td>Acceptable Knowledge</td>
<td>Soil (S4000) Debris (S5000) - RH</td>
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<td>N/A</td>
<td>Data Verification and Validation</td>
<td>Soil (S4000) Debris (S5000) - RH</td>
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<td>N/A</td>
<td>Quality Assurance</td>
<td>Soil (S4000) Debris (S5000) - RH</td>
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<td>N/A</td>
<td>WIPP Waste Information System (WWIS), Waste Data System (WDS)</td>
<td>Soil (S4000) Debris (S5000) - RH</td>
<td>YES</td>
<td>YES</td>
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</tbody>
</table>

*New process to be evaluated at TWPC.*