

United States Government

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**memorandum**MAR 1 2 2019  
Carlsbad Field Office  
Carlsbad, New Mexico 88221

**DATE:** MAR 12 2019  
**REPLY TO**  
**ATTN OF:** CBFO:OQA:MPN:JM:19-0805:UFC 2300.00  
**SUBJECT:** Recertification Audit A-19-16 of the ORNL/CCP  
**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 (ORNL/CCP) 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 ORNL/CCP 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 ORNL/CCP 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.



Martin P. Navarrete  
Senior Quality Assurance Specialist

Attachment



cc: w/attachment  
R. Murray, EM \*ED  
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D. C. Gadbury, CBFO ED  
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R. Chavez, RES ED  
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
<b>PROCESSES OR EQUIPMENT TO BE EVALUATED FOR RECERTIFICATION</b>				
16IQ1	Nondestructive Assay IQ3 Procedures – CCP-TP-046, CCP-TP-047, and CCP-TP-048	Soils (S4000) Debris (S5000)	N/A	YES
16MILCC2	Mobile ISO-Cs 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.