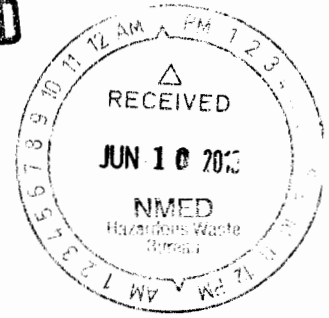




ENTERED

Department of Energy
Carlsbad Field Office
P. O. Box 3090
Carlsbad, New Mexico 88221
June 7, 2019



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

Subject: Audit Plan and Notification of Assigned Auditors for CBFO Audit A-19-24 of the Argonne National Laboratory Central Characterization Program

Dear Mr. Kieling:

This letter transmits the audit plan for Carlsbad Field Office (CBFO) Recertification Audit A-19-24, Argonne National Laboratory Central Characterization Program Transuranic Waste Characterization Activities for Remote-Handled Waste. The audit will be conducted as required by the Waste Isolation Pilot Plant Hazardous Waste Facility Permit, and will be held at the Skeen-Whitlock Building in Carlsbad, NM, and the Argonne National Laboratory in Argonne, IL, July 16 – 18, 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 Martin Navarrete, Senior Quality Assurance Specialist, at (575) 234-7483.

Sincerely,

[Handwritten Signature]
Todd Shrader, Manager
Carlsbad Field Office
For Todd Shrader

Enclosure



cc: w/enclosure
R. Murray, EM-43 *ED
K. Lachman, CBFO ED
M. Brown, CBFO ED
D. Gadbury, CBFO ED
H. Cruickshank, CBFO ED
C. Fesmire, CBFO ED
M. Navarrete, CBFO ED
D. Miehl, CBFO ED
M. Stapleton, CBFO ED
R. Maestas, NMED ED
D. Biswell, NMED ED
M. McLean, NMED ED
T. Runyon, CTAC ED
P. Martinez, CTAC ED
C. Castillo, CTAC ED
H. Tellez, CTAC ED
R. Chavez, CTAC ED
D. Harvill, CTAC ED
G. White, CTAC ED
J. Haschets, RES ED
R. Chavez, RES ED
A. Urquidez, RES ED
CBFO QA File
CBFO M&RC
*ED denotes electronic distribution

**CARLSBAD FIELD OFFICE
AUDIT PLAN**

Audit Number: A-19-24

Organization to be Audited: Argonne National Laboratory (ANL), Nuclear Waste Partnership LLC (NWP) Central Characterization Program (CCP)

Organizations to be Notified: ANL
NWP
New Mexico Environment Department (NMED)
U.S. Environmental Protection Agency (EPA)

Date and Location: July 16 – 18, 2019
Argonne, IL, and Carlsbad, NM

Audit Team:

Martin Navarrete	Carlsbad Field Office (CBFO) Office of Quality Assurance (OQA) Management Representative
Michael Stapleton	CBFO OQA Representative
Ricardo Chavez	Audit Team Leader, CBFO Technical Assistance Contractor (CTAC)
Katie Gentry	Auditor Co-Team Leader, (CTAC)
Charlie Riggs	Auditor, CTAC (Program Status)
Prissy Yanez**	Auditor, CTAC (AK)
Joe Lopez*	Auditor, CTAC (C6 QA)
B. J. Verret*	Auditor, CTAC (C6 QA)
Tim Boswell	Auditor, CTAC (DTC & DM)
Dick Blauvelt**	Technical Specialist, CTAC (AK)
Randy Fitzgerald**	Technical Specialist, CTAC (AK)
Jim Oliver	Technical Specialist, CTAC (DTC & DM)
Rick Castillo	Auditor/Technical Specialist, CTAC (VE & Container Management)
Paul Gomez*	Auditor/Technical Specialist, CTAC (PL V&V)

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

** Indicates team members working via teleconference.

Audit Scope:

The audit team will evaluate the continued adequacy, implementation, and effectiveness of the technical and quality assurance (QA) activities performed by NWP/CCP at ANL for characterization of remote-handled (RH) SCG S5000 debris waste.

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 ANL/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/ANL RH-TRU Waste Interface Document, CCP-PO-500*
- *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

- Personnel Qualification and Training
- Records
- Quality Improvement/Nonconformances
- Measuring and Test Equipment (M&TE)
- Software Version Installation

Technical Activities

- Project-level Data Validation and Verification (PLV&V)
- Acceptable Knowledge (AK)

- Visual Examination (VE)
- Dose-to-Curie (DTC)
- Dimensional Measurement (DM)
- Container Management
- WIPP Waste Information System/Waste Data System (WWIS/WDS)


Schedule of Audit Activities:

A pre-audit conference is scheduled for Tuesday, July 16, 2019, at 9:00 a.m. CDT.

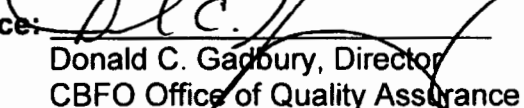
If needed, the audit team leader will conduct a management briefing with appropriate ANL and NWP/CCP management at 8:30 a.m. CDT on Wednesday and Thursday, July 17 and 18, 2019.

A post-audit conference is scheduled for Thursday, July 18, 2019, at 12:00 p.m. CDT.

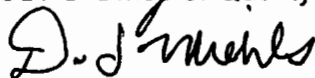
All meetings will take place at designated locations at the ANL and at the Skeen-Whitlock Building in Carlsbad, NM, as indicated on the daily schedule.

Prepared by: 
Ricardo Chavez
CTAC Audit Team Leader

Date: 6/4/19

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

Date: 6-5-19


Dennis S. Michls

6-5-19

Table 1 ANL-CCP RH WIPP Certified Program Waste Characterization Processes To Be Audited RH S5000 AERHDM Debris
Acceptable Knowledge
Data Generation and Project Level Validation & Verification
Visual Examination WIPP # 8RHVE1 WIPP # 8RHVE2 for Newly Packaged RH Drums
Dose-to-Curie (Radiological Characterization) WIPP # 8DTC1 Dimensional/Gravimetric (DG) Measurement WIPP # 8RHGM1
WIPP Waste Information System/Waste Data System
Quality Assurance
Permit Requirement: <ul style="list-style-type: none"> - Per the <i>WIPP Hazardous Waste Facility Permit Waste Analysis Plan</i>; Section C6-3, Audit Position Functions, "Audits will be conducted at least annually for each site involved in the waste characterization program".
EPA Approvals: <ul style="list-style-type: none"> - Tier 1 approval adding 100 drums of AGHCF debris waste to waste stream AERHDM dated October 2008, A-98-49; II-A4-136. - Tier 1 approval adding K-Wing debris to waste stream AERHDM dated September 2010, A-98-49; II-A4-132. - Tier 1 approval adding 120 containers of AGHCF debris waste to waste stream AERHDM dated September 2010, A-98-49; II-A4-134. - Tier 1 approval adding AGHCF fuel pin FEW in waste stream AERHDM dated November 2010, A-98-49; II-A4-140. - Tier 1 approval adding K-Wing FEW to waste stream AERHDM dated February 2012, A-98-49; II-A4-158. - Tier 1 approval adding K-Wing Solidified Liquid Waste to waste stream AERHDM dated June 2012, A-98-49; II-A4-162. - Tier 1 approval adding AGHCF RERTR FEW and second batch of Fuel Pin FEW dated October 2012, A-98-49; II-A4-167. - EPA letter dated September 2013, found the DOE met the goal of shipping due to measurement uncertainty by combining multiple measurements and shielding calculations. - Tier 1 approval adding 5 containers to the AERHDM waste stream dated March 2014, A-98-49; II-A4-181.