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

JUL 19 2019



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

CERTIFIED MAIL: RETURN RECEIPT

Subject: Transmittal of the Hazardous Waste Facility Permit Attachment C6 Audit Plan, Including Identification of Assigned Auditors for CBFO Certification Audit A-19-29 of the Lawrence Livermore National Laboratory Central Characterization Program

Dear Mr. Kieling:

This letter transmits the audit plan for Carlsbad Field Office (CBFO) Audit A-19-29 for certification of the Lawrence Livermore National Laboratory (LLNL) Central Characterization Program for performing contact-handled transuranic waste characterization activities. The audit will be conducted as required by the Waste Isolation Pilot Plant Hazardous Waste Facility Permit at the LLNL in Livermore, California, and at the Skeen-Whitlock Building in Carlsbad, New Mexico, August 27-29, 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. Dennis Miehl, Senior Quality Assurance Specialist, at (575) 234-7491.

Sincerely,

J.R. Stoble FOR

Kirk D. Lachman, Acting Manager
Carlsbad Field Office

Enclosure



**CARLSBAD FIELD OFFICE
AUDIT PLAN**

Audit Number: A-19-29

Organization to be Audited: Lawrence Livermore National Laboratory (LLNL), Nuclear Waste Partnership LLC (NWP) Central Characterization Program (CCP)

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

Date and Location: August 27 – 29, 2019
Livermore, CA, and Carlsbad, NM

Audit Team:

Dennis Miehls	Carlsbad Field Office (CBFO) Office of Quality Assurance (QA) Management Representative
Joe Lopez	Audit Team Leader, CBFO Technical Assistance Contractor (CTAC)
Cindi Castillo	Auditor, Co-Team Leader (CTAC)
Katie Gentry	Auditor, CTAC (Program Status, QA Program, and Interface)
Bob Prentiss*	Auditor, CTAC (C6 QA)
Rick Castillo*	Auditor, CTAC (C6 QA)
Charlie Riggs	Auditor, CTAC (AK)
Priscilla Yanez	Auditor, CTAC (RTR)
Porf Martinez	Auditor, CTAC (VE)
Tim Boswell	Auditor, CTAC (NDA)
Randy Fitzgerald	Technical Specialist, CTAC (AK)
Dick Blauvelt*	Technical Specialist, CTAC (AK)
Dustin Stegman	Technical Specialist, CTAC (VE)
Rhett Bradford	Technical Specialist, CTAC (RTR)
Paul Gomez	Technical Specialist, CTAC (PL V&V)
Jim Oliver	Technical Specialist, CTAC (NDA)
B.J. Verret	Technical Specialist, CTAC (FGA, GGT, and Container Management)

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

Audit Scope:

The audit team will evaluate the adequacy, implementation, and effectiveness of the technical and QA activities performed by NWP CCP at LLNL for characterization of contact-handled (CH) transuranic (TRU) Summary Category Groups (SCGs) S3000 solids and S5000 debris wastes. This audit is considered an initial certification audit.

The audit team will also verify that a technical review of the generator site's processes has been performed and that any issues identified during the technical

review have been resolved per DOE/WIPP-16-3564, *Generator Site Technical Review Procedure*.

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 LLNL/CCP documents will be based on the current revisions of the following documents:

- *CBFO 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
- *Waste Isolation Pilot Plant Documented Safety Analysis*, DOE/WIPP-07-3372 (Chapter 18)

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/LLNL Interface Document*, CCP-PO-048
- Related NWP CCP QA and technical implementing procedures

Activities to be Audited:

General

- Results of Previous Audits – N/A*
- Changes in Programs or Operations – N/A*
- New Programs or Activities Being Implemented – N/A*
- Changes in Key Personnel – N/A*

**N/A is due to this being an initial certification audit.*

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)
- Real-Time Radiography (RTR)
- Visual Examination (VE)
- Nondestructive Assay (NDA), including Performance Demonstration Program
- Flammable Gas Analysis (FGA)
- Gas Generation Testing (GGT)
- Container Management
- WIPP Waste Information System/Waste Data System (WWIS/WDS)

Schedule of Audit Activities:

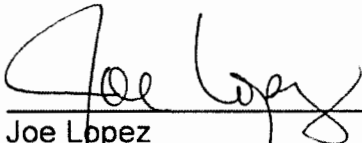
Please note all times listed are Pacific Daylight Time (PDT).

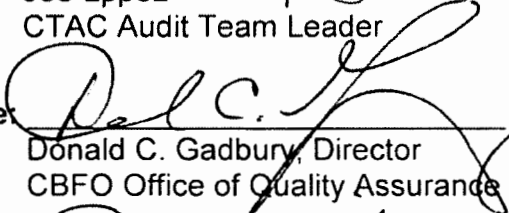
A pre-audit conference is scheduled for Tuesday, August 27, 2019, at 9:30 a.m. PDT, at the LLNL site in Building 361, Auditorium.

If needed, the audit team leader will conduct a management briefing with appropriate LLNL and NWP CCP management at 8:30 a.m. PDT on Wednesday and Thursday, August 28 and 29, 2019.

A post-audit conference is scheduled for Thursday, August 29, 2019, at 3:00 p.m. PDT, at the LLNL site in Building 361, Auditorium.

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

Prepared by:  Date: 7/16/19
Joe Lopez
CTAC Audit Team Leader

Concurrence:  Date: 7-17-19
Donald C. Gadbury, Director
CBFO Office of Quality Assurance

 7-17-19

Processes and Equipment to be Evaluated During the A-19-29 LLNL/CCP Audit

WDS ID# Method & WIPP #	Process/Equipment Description	CH S3000 Homogeneous Solids		CH S5000 Debris	
		Newly Generated	Retrievably Stored	Newly Generated	Retrievably Stored
N/A	Acceptable Knowledge (AK) Procedures: CCP-TP-005, CCP-TP-200 <ul style="list-style-type: none"> ❖ Enhanced AK ❖ Enhanced Chemical Compatibility Evaluation ❖ Basis of Knowledge Evaluating Oxidizing Chemicals in TRU Waste 	TBA	TBA	TBA	TBA
		TBA*	TBA*	TBA*	TBA*
		TBA*	TBA*	TBA*	TBA*
		TBA*	TBA*	TBA*	TBA*
N/A	Load Management	N/A	N/A	N/A	N/A
N/A	Project Level Data Validation & Verification Procedures: CCP-TP-001, CCP-TP-002, CCP-TP-048	TBA	TBA	TBA	TBA
13VE1 N/A	Visual Examination Procedure: CCP-TP-113	TBA	N/A	TBA	N/A
13MILCC4 MILCC4	Nondestructive Assay, including Performance Demonstration Program (PDP) Procedures: CCP-TP-076, CCP-TP-077, CCP-TP-048, CCP-TP-058 Description: Mobile ISOCS Large Container Counter (MILCC) calibrated for 55-gallon drums, 12" Pipe Overpack Containers, and Standard Waste Boxes	TBA	TBA	TBA	TBA
13SG1 SGS	Nondestructive Assay, including PDP Procedures: CCP-TP-202, CCP-TP-203, CCP-TP-048, CCP-TP-058 Description: Segmented Gamma Scanner (SGS) Calibrated for 55-gallon drums	TBA	TBA	TBA	TBA
13RR1 RTR2	Real-Time Radiography Procedures: CCP-TP-053, CCP-TP-079	N/A	TBA	N/A	TBA
13HG7 FGA7	Flammable Gas Analysis as identified in DOE/WIPP-06-3345	TBA	TBA	TBA	TBA
13GG1 GGT	Gas Generation Testing Procedure: CCP-TP-083	TBA*	TBA*	N/A	N/A

Processes and Equipment to be Evaluated During the A-19-29 LLNL/CCP Audit (cont.)

WDS ID# Method & WIPP #	Process/Equipment Description	CH S3000 Homogeneous Solids		CH S5000 Debris	
		Newly Generated	Retrievably Stored	Newly Generated	Retrievably Stored
N/A	WIPP Waste Information System/Waste Data System (WWIS/WDS) Procedure: CCP-TP-030 Description: CH TRU Waste Characterization and WWIS Data Entry	TBA*	TBA*	TBA*	TBA*
N/A	Quality Assurance (QA)	TBA	TBA	TBA	TBA
Notes: TBA: To Be Audited TBA*: The above activities may not be available during the audit, and therefore may require additional assessments. This audit is considered an initial certification audit seeking approvals from the NMED and/or the EPA.					