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: Audit Plan and Notification of Assigned Auditors for CBFO
Recertification Audit A-20-07 of the Savannah River Site Central
Characterization Program

Dear Mr. Kieling:

This letter transmits the audit plan for Carlsbad Field Office (CBFO) Recertification
Audit A-20-07 of the Savannah River Site Central Characterization Program, to be
conducted at the Skeen-Whitlock Building in Carlsbad, New Mexico, Nov. 4 – 6, 2019.
The audit will be conducted as required by the Waste Isolation Pilot Plant Hazardous
Waste Facility Permit. 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.

Please contact Micheal Stapleton, Quality Improvement Specialist, CBFO Office of
Quality Assurance, at (575) 234-7048, should you have questions concerning this
notification.

Sincerely,

Kirk D. Lachman, Acting Manager
Carlsbad Field Office

Enclosure
cc: w/enclosure

R. Murray, EM-43 *ED
D. C. Gadbury, CBFO ED
D. Miehls, CBFO ED
A. Stone, CBFO ED
M. Stapleton, CBFO ED
M. Brown, CBFO ED
C. Fesmire, CBFO ED
N. Castaneda, CBFO ED
T. Carver, CBFO ED
P. Theisen, SNL 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
P. Yanez, CTAC ED
D. Harvill, CTAC ED
G. White, CTAC ED
A. Urquidez, RES ED
J. Haschets, RES ED
R. Chavez, RES ED

CBFO QA File
CBFO M&RC

*ED denotes electronic distribution
CARLSBAD FIELD OFFICE AUDIT PLAN

Audit Number: A-20-07

Organization to be Audited: Savannah River Site (SRS), Nuclear Waste Partnership LLC (NWP) Central Characterization Program (CCP)

Organizations to be Notified: SRS, NWP, New Mexico Environment Department (NMED), U.S. Environmental Protection Agency (EPA), Defense Nuclear Facilities Safety Board

Date and Location: November 4 - 6, 2019, Skeen-Whitlock Building, Carlsbad, New Mexico

Audit Team: Micheal Stapleton, Carlsbad Field Office (CBFO) Quality Assurance Management Representative; Dennis Miehls, CBFO Quality Assurance Management Representative; Priscilla Yanez, Audit Team Leader, CBFO Technical Assistance Contractor (CTAC); Shelly Martinez, Audit Team Leader-in-Training, CTAC; Katie Gentry, Auditor, CTAC (C6 QA), CTAC; Bob Prentiss, Auditor, CTAC (AK QA); Rodney Montoya, Auditor-in-Training, CTAC (C6 QA); Paul Gomez, Technical Specialist, CTAC (PL V&V); Dick Blauvelt*, Technical Specialist, CTAC (AK); Randy Fitzgerald*, Technical Specialist, CTAC (AK)

*Participating via telecom

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 the SRS for characterization of contact-handled (CH) transuranic (TRU) Summary Category Groups (SCGs) S3000 solids, S4000 soils/gravel, and S5000 debris wastes, and remote-handled (RH) TRU SCG S5000 debris waste.

Waste characterization activities at the SRS have been suspended and no field waste characterization activities have been performed.

A list of the equipment and processes to be evaluated is attached to this plan (Attachment 1).
Governed Documents/Requirements:

Evaluation of the overall program adequacy, implementation, and effectiveness of SRS/CCP documents will be based on the current revisions of the following documents:

- Waste Isolation Pilot Plant Hazardous Waste Facility Permit NM4890139088-TSDF
- DOE/CBFO-94-1012, Quality Assurance Program Document
- DOE/WIPP-02-3122, Transuranic Waste Acceptance Criteria for the Waste Isolation Pilot Plant
- DOE/WIPP-02-3214, Remote-Handled TRU Waste Characterization Program Implementation Plan
- DOE/WIPP-07-3372, Waste Isolation Pilot Plant Documented Safety Analysis (Chapter 18)

Programmatic and technical checklists will be developed from the current revisions of the following documents:

- CCP-PO-001, CCP Transuranic Waste Characterization Quality Assurance Project Plan
- CCP-PO-002, CCP Transuranic Waste Certification Plan
- Related NWP SRS/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
- Records

Technical Activities to be evaluated
- Project-Level Data Validation and Verification (PL V&V)
- Acceptable Knowledge (AK), including waste certification
  - Including, but not limited to, Enhanced Chemical Compatibility Evaluation Memorandum, Basis of Knowledge, AK Assessments, AK Briefings, Interface Waste Management Documents List
Schedule of Audit Activities:

Audit activities will be conducted in Carlsbad, New Mexico.

A pre-audit conference is scheduled for 9:00 a.m. on Monday, November 4, 2019, at the Skeen-Whitlock Building, CTAC Conference Room.

If needed, the audit team leader will conduct a management briefing with appropriate NWP CCP Management at 8:30 a.m. on Tuesday and Wednesday, November 5 and 6, 2019, at the Skeen-Whitlock Building, CBFO QA Conference Room.

A post-audit conference is scheduled for 2:00 p.m. on Wednesday, November 6, 2019, at the Skeen-Whitlock Building, CBFO QA Conference Room.

Approved By: Priscilla Yanez, CTAC Audit Team Leader

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

Date: 9/25/19

Date: 9-27-19

Date: 9-30-19
<table>
<thead>
<tr>
<th>WIPP #</th>
<th>Process / Equipment Description</th>
<th>Applicable to the Following Waste Streams / Groups of Waste Streams</th>
<th>Currently Approved by NMED</th>
<th>Currently Approved by EPA</th>
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</thead>
<tbody>
<tr>
<td>1NABC1</td>
<td>Nondestructive Assay Procedures - CCP-TP-189 and CCP-TP-191 Description - Box Segmented Gamma System (BSG5) and Box Neutron Assay System (BNAS), Five Foot Setback Configuration</td>
<td>Solids (S3000) Solts/Gravel (S4000) Debris (S50000)</td>
<td>N/A</td>
<td>*Suspended</td>
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<tr>
<td>1LCNDE</td>
<td>Real-time Radiography Procedure - CCP-TP-053 and CCP-TP-074 Description - Large Container Non-Destructive Examination (LCNDE) Unit - standard waste boxes (SWBs) and SLB2s</td>
<td>Solids (S3000) Solts/Gravel (S4000) Debris (S5000)</td>
<td>*Suspended</td>
<td>*Suspended</td>
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<td>1RR4</td>
<td>Real-time Radiography Procedure - CCP-TP-053 and CCP-TP-145 Description - RTR-4, 55-gallon drums and standard waste boxes (SWBs), Standard large box 2s (SLB2s)</td>
<td>Solids (S3000) Solts/Gravel (S4000) Debris (S5000)</td>
<td>*Suspended</td>
<td>*Suspended</td>
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<td>VISUAL</td>
<td>Visual Examination Procedure - CCP-TP-113 and CCP-TP-163 Description - VE QC Check for RTR, VE in lieu of RTR, VE for Retrievably Stored Waste</td>
<td>Solids (S3000) Solts/Gravel (S4000) Debris (S5000)</td>
<td>*Suspended</td>
<td>*Suspended</td>
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<tr>
<td>1RHVE1</td>
<td>Visual Examination Procedure - CCP-TP-163 and CCP-TP-500 Description - Visual Examination of Records for Remote-Handled for Waste Stream SR-RH-SDD.01 only</td>
<td>Debris (S5000)</td>
<td>*Suspended</td>
<td>*Suspended</td>
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<td>1DTC1</td>
<td>Dose-to-Curie Procedure - CCP-TP-504 Description - Radiochemical Characterization</td>
<td>Debris (S5000)</td>
<td>N/A</td>
<td>*Suspended</td>
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<td>WIPP #</td>
<td>Process/Equipment Description</td>
<td>Applicable to the Following Waste Streams/Groups of Waste Streams</td>
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<td>Currently Approved by EPA</td>
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<tr>
<td>16311</td>
<td>Dose-to-Curie (Sealed Sources) Procedure – CCP-RC-SRS-631 Description – Radiological Characterization</td>
<td>Debris (S5000)</td>
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<td>N/A</td>
<td>Acceptable Knowledge (AK)</td>
<td>Solids (S3000)</td>
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<td>N/A</td>
<td>Data Generation and Project Level Validation and Verification (V&amp;V)</td>
<td>Solids (S3000)</td>
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<td>WIPP Waste Information System/Waste Data System (WWIS/WDS)</td>
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<td>Quality Assurance Program</td>
<td>Solids (S3000)</td>
<td>N/A</td>
<td>YES</td>
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</tbody>
</table>

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