
WASTE ISOLATION PILOT PLANT
EPA I.D. NUMBER NM4890139088

Dear Messrs. Lachman and Dunagan:

New Mexico Environment Department ("NMED") received the Final Audit Report for Audit A-18-17 for the Argonne National Laboratory/ Central Characterization Program ("ANL/CCP") on September 28, 2018 in a letter dated September 29, 2018. The Final Audit Report for A-19-24 was received on August 20, 2019 in a letter dated August 19, 2019. The US Department of Energy ("DOE") and Nuclear Waste Partnership LLC ("NWP") (collectively the "Permittees") were required to submit these Final Audit Reports under the Waste Isolation Pilot Plant ("WIPP") Hazardous Waste Facility Permit (" Permit"), as specified in Permit Section 2.3.2.3.

The intended scope of Audit A-18-17 and A-19-24 was to ensure the continued adequacy, implementation, and effectiveness of the ANL/CCP waste characterization for remote-handled ("RH") Summary Category Group ("SCG") S5000 debris wastes relative to the requirements of the WIPP Permit.

The Final Audit Report consisted of the following items:

- A narrative report;
- Completed copies of the relevant Permit Attachment C6 checklists;
- List of final ANL/CCP standard operating procedures; and
- Objective evidence examined during the audit.
NMED representatives observed Audit A-18-17 on July 31 - August 2, 2018 and Audit A-19-24 on July 16-18, 2019. Additionally, NMED has examined the Final Audit Reports for evidence of compliance with the requirements of Permit Sections 2.3.1 (Waste Analysis Plan ("WAP"). and 2.3.2 (Audit and Surveillance Program).

Attached are NMED's general comments and conclusions based upon observation of the audit and review of the Final Audit Reports. Based on NMED's review and conclusions, NMED hereby approves ANL/CCP Final Audit Report A-18-17 and Final Audit Report A-19-24. NMED also amends the previous final audit report approval for Final Audit Reports A-14-20, A-15-24, A-17-08 and A-17-25, issued by NMED on November 7, 2018, to include only those waste forms and processes evaluated by these recertification audits.

The audit report approval for Final Audit Reports A-18-17 and A-19-24 is an approval of the broad programmatic implementation of waste characterization requirements at ANL/CCP and does not constitute approval of individual waste characterization procedures, or inappropriate applications of those procedures. This approval does not relieve the Permittees of their obligation to comply with the requirements of the Permit or other applicable laws and regulations.

If you have any questions regarding this matter, please contact Ricardo Maestas of my staff at (505) 476-6050.

Sincerely,

[Signature]

John E. Kieling
Chief
Hazardous Waste Bureau

cc:  R. Maestas, NMED HWB
     S. Lucas-Kamat, NMED DOE/OB
     L. King, EPA Region 6
     T. Peake, EPA ORIA
     File: WIPP '19
NMED Comments and Conclusions for ANL/CCP Final Audit Reports A-18-17 and A-19-24

**ANL/CCP Audit A-18-17**

Interim Audit Report A-18-17, issued by DOE on August 22, 2018, indicated that the audit team identified three non-WAP-related concerns. One concern was determined to be a condition adverse to quality ("CAQ") resulting in issuance of a corrective action report ("CAR"). Additionally, one Observation and one Recommendation were offered for management consideration.

Final Audit Report A-18-17, was issued by DOE on September 24, 2018, and noted that, with the exception of the WIPP Waste Information System ("WWIS")/Waste Data System ("WDS") process, the audit team concluded that, based on personnel interviews, observations of operations, and review of associated documentation and records, the ANL/CCP TRU waste characterization program and activities for characterizing RH SCG S5000 debris waste adequately address upper-tier requirements and the program procedures are satisfactorily implemented and effective in achieving the desired results. Effective implementation of the WWIS/WDS process was deemed indeterminate due to inactivity relative to RH waste characterization by ANL/CCP. No WAP-related concerns were identified during the audit.

NMED concludes that Final Audit Report A-18-17 demonstrates that ANL/CCP has implemented the applicable characterization requirements of the WAP during the applicable timeframe.

**ANL/CCP Audit A-19-24**

NMED notes that the ANL/CCP Final Audit Report for Audit A-19-24 is submitted under the revised report format where both WAP and Non-WAP information is summarized. Final Audit Report A-19-24 indicated that the audit team identified no WAP-related or non-WAP-related concerns during the audit. The audit team concluded that, based on personnel interviews, observations of operations, and review of associated documentation and records, the ANL/CCP TRU waste characterization program and activities for characterizing RH SCG S5000 debris waste adequately address upper-tier requirements. The processes for characterizing RH SCG S5000 debris waste were satisfactorily implemented and effective in achieving the desired results.

NMED concludes that Final Audit Report A-19-24 demonstrates that ANL/CCP has implemented the applicable characterization requirements of the WAP during the applicable timeframe.