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Department of Energy
Carlsbad Field Office
P. O. Box 3090
Carlsbad, New Mexico 88221
MAR 16 2020



CERTIFIED MAIL: RETURN RECEIPT

Mr. Kevin Pierard, Chief
Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505

Subject: Transmittal of the Revised Hazardous Waste Facility Permit Attachment C6
Audit Plan and Notification of Assigned Auditors for CBFO Recertification Audit
A-20-14 of the Oak Ridge National Laboratory Central Characterization Program

Dear Mr. Pierard:

This letter transmits the revised audit plan for Carlsbad Field Office (CBFO) Recertification Audit A-20-14 of the Oak Ridge National Laboratory (ORNL) Central Characterization Program for transuranic waste characterization activities. Due to heightened awareness and to decrease the potential development, spread, and impact of the acute respiratory illness, COVID-19, the audit team will not travel to the ORNL site. All audit activities will be conducted from Carlsbad, NM, or via teleconference April 21 – 23, 2020. This will not be the normal method for performing recertification audits. 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, Acting Director for CBFO Office of Quality Assurance, at (575) 234-7491.

Sincerely,

[Handwritten signature]
Gregory Sosson
Acting Manager
Carlsbad Field Office
for Greg Sosson

Enclosure

SCANNED



cc: w/enclosure

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CBFO QA File

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*ED denotes electronic distribution

**CARLSBAD FIELD OFFICE
REVISED AUDIT PLAN**

Audit Number: A-20-14

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 21 – 23, 2020
Carlsbad, NM

Audit Team:

Dennis Miehl	Carlsbad Field Office (CBFO) Office of Quality Assurance (QA) Management Representative
Joe Lopez	CBFO QA Management Representative
Katie Gentry	Audit Team Leader, CBFO Technical Assistance Contractor (CTAC)
Bob Prentiss	Auditor, CTAC (C6 QA)
Prissy Yanez	Auditor, CTAC (RTR)
Rick Castillo	Auditor, CTAC (NDA/DTC)
Steve Shafer	Auditor, CTAC (VE)
Tim Boswell	Auditor, CTAC (Program Status)
Nathan Denney	Auditor-in-Training, CTAC (AK)
Dick Blauvelt**	Technical Specialist, CTAC (AK)
Jim Oliver	Technical Specialist/Auditor-in-Training, CTAC (NDA/DTC)
Dustin Stegman	Auditor/Technical Specialist, CTAC (VE)
Kirk Kirkes	Auditor/Technical Specialist, CTAC (PL V&V)
Paul Gomez	Auditor/Technical Specialist, CTAC (CM/FGA)
Randy Fitzgerald	Auditor/Technical Specialist, CTAC (AK)
Shelly Gomez	Auditor/Technical Specialist, CTAC (RTR)

** Indicates team members working via teleconference.

Audit Scope:

The audit team will evaluate the adequacy, implementation, and effectiveness of the technical and 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.

Due to heightened awareness and to decrease the potential development, spread, and impact of the acute respiratory illness, COVID-19, the audit team will not travel to the ORNL site. All audit activities will be conducted from Carlsbad, NM, or via teleconference. This will not be the normal method for performing recertification audits. Transportation activities will not be included in the scope of this audit; however, Flammable Gas Analysis will be included.

A list of 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:

- DOE/CBFO-94-1012, *Quality Assurance Program Document*
- Waste Isolation Pilot Plant Hazardous Waste Facility Permit NM4890139088-TSDF
- 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*
- CCP-PO-027, *CCP/TRU Waste Processing Center/Oak Ridge National Laboratory Interface Document*
- 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 (PL/V&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 21, 2020, at 9:00 a.m. (MDT).

If needed, the audit team leader will conduct a management briefing with appropriate ORNL and NWP/CCP management at 8:30 a.m. (MDT) on Wednesday and Thursday, April 22 and 23, 2020.

A post-audit conference is scheduled for Thursday, April 23, 2020, at 2:00 p.m. (MDT).

All meetings will take place at designated locations at the Skeen-Whitlock Building in Carlsbad, NM.

Prepared by: Katie Gentry
Katie Gentry
CTAC Audit Team Leader

Date: 3/9/2020

Concurrence: D. S. Miehl
Dennis S. Miehl, Acting Director
CBFO Office of Quality Assurance

Date: 3-13-2020

WIPP #	Process/Equipment Description	Applicable to the Following Waste Streams/Groups of Waste Streams	Currently Approved by NMED	Currently Approved by EPA
PROCESSES TO BE EVALUATED FOR RECERTIFICATION				
16IQ1	Nondestructive Assay IQ3 Procedures – CCP-TP-046, CCP-TP-047, and CCP-TP-048	Soils (S4000) Debris (S5000)	N/A	YES
16MILCC2	Mobile ISOCs 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	Soils (S4000) – RH 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	YES	YES
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 Procedure – CCP-TP-005	Soils (S4000) Debris (S5000) Soils (S4000) – RH Debris (S5000) – RH	YES	YES
N/A	Data Verification and Validation	Soils (S4000) Debris (S5000) Soils (S4000) – RH Debris (S5000) – RH	YES	YES
N/A	Quality Assurance Program	Soils (S4000) Debris (S5000) Soils (S4000) – RH Debris (S5000) – RH	YES	YES
N/A	WIPP Waste Information System (WWIS)/Waste Data System (WDS) Procedures – CCP-TP-030 and CCP-TP-530	Soils (S4000) Debris (S5000) Soils (S4000) – RH Debris (S5000) – RH	YES	YES