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 Miehls,
Acting Director for CBFO Office of Quality Assurance, at (575) 234-7491.

Sincerely,

Gregory Sosson
Acting Manager
Carlsbad Field Office

Enclosure
Mr. Pierard

cc: w/enclosure
R. Murray, EM-3.113 *ED
K. Lachman, CBFO ED
D. Miehls, CBFO ED
M. Brown, CBFO ED
J. Lopez, CBFO ED
M. Stapleton, CBFO ED
N. Castaneda, CBFO ED
T. Carver, CBFO ED
C. Fesmire, CBFO ED
R. Maestas, NMED ED
D. Biswell, NMED ED
M. McLean, NMED ED
P. Martinez, CTAC ED
R. Castillo, CTAC ED
C. Castillo, CTAC ED
K. Gentry, 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
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 Miehls 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-02-3214, *Remote-Handled TRU Waste Characterization Program Implementation Plan*

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
CTAC Audit Team Leader

Date: 3/9/2020

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

Date: 3-13-2020
<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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<tr>
<td>16IQ1</td>
<td>Nondestructive Assay IQ3 Procedures – CCP-TP-046, CCP-TP-047, and CCP-TP-048</td>
<td>Soils (S4000) Debris (S5000)</td>
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<td>16MILCC2</td>
<td>Mobile ISOCs Large Container Counter (MILCC2) Procedures – CCP-TP-076, CCP-TP-077, and CCP-TP-048</td>
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<td>16DTC1</td>
<td>Dose-to-Curie (Radiological Characterization) Procedure – CCP-TP-504</td>
<td>Soils (S4000) – RH Debris (S5000)</td>
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<td>16RR1</td>
<td>Real-Time Radiography Mobile Characterization System RTR #6 Procedures – CCP-TP-053 and CCP-TP-165</td>
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<td>16RHVE1</td>
<td>Visual Examination Procedure – CCP-TP-500</td>
<td>Debris (S5000) – RH</td>
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<td>16VE1</td>
<td>Visual Examination Procedure – CCP-TP-113</td>
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<td>N/A</td>
<td>Acceptable Knowledge Procedure – CCP-TP-005</td>
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<td>N/A</td>
<td>Data Verification and Validation</td>
<td>Soils (S4000) Debris (S5000) Soils (S4000) – RH Debris (S5000) – RH</td>
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<td>N/A</td>
<td>Quality Assurance Program</td>
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<tr>
<td>N/A</td>
<td>WIPP Waste Information System (WWIS)/Waste Data System (WDS) Procedures – CCP-TP-030 and CCP-TP-530</td>
<td>Soils (S4000) Debris (S5000) Soils (S4000) – RH Debris (S5000) – RH</td>
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