



NEW MEXICO
ENVIRONMENT DEPARTMENT



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MAY 15 2020

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Sean Dunagan, Project Manager
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RE: **NMED APPROVAL OF THE LAWRENCE LIVERMORE NATIONAL LABORATORY/
CENTRAL CHARACTERIZATION PROGRAM (LLNL/CCP) FINAL AUDIT REPORT A-20-30
WASTE ISOLATION PILOT PLANT
EPA I.D. NUMBER NM4890139088**

Dear Messrs. Sosson and Dunagan:

On April 28, 2020, the New Mexico Environment Department ("NMED") received the Final Audit Report of the Lawrence Livermore National Laboratory/ Central Characterization Program ("LLNL/CCP") Audit A-20-30, in a letter dated April 27, 2020. The Department of Energy's Carlsbad Field Office ("DOE") and Nuclear Waste Partnership, LLC ("NWP") (collectively the "Permittees") were required to submit the Final Audit Report under the Waste Isolation Pilot Plant ("WIPP") Hazardous Waste Facility Permit ("Permit"), as specified in Permit Part 2, Section 2.3.2.3.

The intended scope of Audit A-20-30 was to ensure the adequacy, implementation, and effectiveness of the LLNL/CCP waste characterization process for contact-handled ("CH") Summary Category Groups ("SCGs") S3000 solids and 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 LLNL/CCP standard operating procedures; and
- Objective evidence examined during the audit.

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Messrs. Sosson and Dunagan

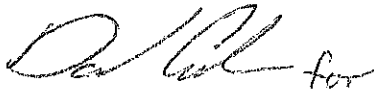
NMED representatives observed Audit A-20-30 on March 30 – April 2, 2020. NMED has examined the Final Audit Report for evidence of compliance with the requirements of Permit Part 2, Sections 2.3.1 (Waste Analysis Plan ("WAP")) and 2.3.2 (Audit and Surveillance Program). Audit A-20-30 was conducted as a desktop document review to address those items that were found to be indeterminate during the initial Certification Audit A-19-29 in August 2019. No WAP-affecting conditions adverse to quality or WAP-affecting observations were identified during Audit A-20-30.

Attached are NMED's general comments and conclusions based upon observation of the audit and review of the Final Audit Report. NMED hereby approves LLNL/CCP Final Audit Report A-20-30 to include only those waste forms and processes evaluated by this certification audit.

This Final Audit Report approval for LLNL/CCP Audit A-20-30 is an approval of the broad programmatic implementation of WAP-related waste characterization requirements at LLNL/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,



Kevin Pierard
Chief
Hazardous Waste Bureau

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File: WIPP '20

NMED Comments and Conclusions on LLNL/CCP Final Audit Report A-20-30

Messrs. Sosson and Dunagan

The Final Audit Report indicated that the audit team identified no concerns during Audit A-20-30. The audit team verified that the two conditions adverse to quality that were identified during the initial Certification Audit A-19-29 were resolved and show that remedial actions have adequately taken place. Audit A-20-30 was conducted as a supplemental audit to evaluate the indeterminate findings previously identified during the initial Certification Audit A-19-29.

The audit team concluded that the LLNL/CCP waste characterization program procedures for characterizing CH SCGs S3000 solids and S5000 debris wastes adequately address upper-tier requirements and were satisfactorily implemented and effective in achieving the desired results. NMED concludes that Final Audit Report A-20-30 demonstrates that LLNL/CCP has implemented the applicable characterization requirements of the WAP during the applicable timeframe.