



June 17, 2021

Reinhard Knerr, Manager
Carlsbad Field Office
Department of Energy
P.O. Box 3090
Carlsbad, New Mexico 88221-3090

Sean Dunagan, Project Manager
Nuclear Waste Partnership, LLC
P.O. Box 2078
Carlsbad, New Mexico 88221-2078

**RE: NMED APPROVAL OF THE SAVANNAH RIVER SITE / CENTRAL CHARACTERIZATION PROGRAM
(SRS/CCP) FINAL AUDIT REPORT A-21-08 AREA E
WASTE ISOLATION PILOT PLANT
EPA I.D. NUMBER NM4890139088**

Dear Messrs. Knerr and Dunagan:

On March 8, 2021, the New Mexico Environment Department (NMED) received the Final Audit Report of the Savannah River Site / Central Characterization Program (SRS/CCP) Audit A-21-08. The Department of Energy (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 scope of Audit A-21-08 was to ensure the continued adequacy, implementation, and effectiveness of SRS/CCP waste characterization processes for characterizing contact-handled (CH) Wastes Summary Category Group S5000 debris wastes, relative to the requirements of the WIPP Permit. Due to the scope of this audit and inactivity at the SRS since the previous Audit A-21-02, the audit team's focus was the certification of the Transuranic waste characterization program in Area E.

In order to decrease the potential development, spread, and impact of Coronavirus-19 (COVID-19) and due to COVID-19 travel restrictions, the audit team did not travel to the SRS site however, a DOE Carlsbad Field Office Technical Assistance Contractor (CTAC) auditor residing in the SRS area was utilized to conduct Quality Assurance related evaluations at the site. NMED acknowledges that most audit activities were conducted via teleconference and field activities were evaluated at the SRS Area E facility via live streaming.

The Final Audit Report consisted of the following items:

- A narrative report;
- Completed copies of the relevant Permit Attachment C6 checklists;
- List of final SRS/CCP standard operating procedures; and
- Objective evidence examined during the audit.

NMED observed Audit A-21-08 December 8 - 10, 2020 and 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). The Final Audit Report indicated that the audit team identified no Permit WAP-related concerns during the audit and concluded that waste characterization program procedures were satisfactorily implemented and effective in achieving the desired results.

Final Audit Report A-21-08 demonstrates that SRS/CCP has implemented the applicable waste characterization requirements of the WAP during the applicable timeframe. NMED hereby approves SRS/CCP Final Audit Report A-21-08 to include only those waste forms and processes evaluated by this recertification audit.

This letter represents an approval of the broad programmatic implementation of WAP-related waste characterization requirements at SRS/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 me (505) 476-6050.

Sincerely,

Ricardo Maestas  Digitally signed by Ricardo
Maestas
Date: 2021.06.17 15:16:35 -06'00'

Ricardo Maestas
Acting Chief
Hazardous Waste Bureau

cc: D. Biswell, NMED HWB
M. McLean, NMED HWB
N. Barka, NMED HWB
L. King, EPA Region 6
T. Peake, EPA ORIA
D. Jolley, DOE CBFO
J. Lopez, DOE CBFO
M. Stapleton, CBFO
File: WIPP '21