

# memorandum

Carlsbad Field Office  
Carlsbad, New Mexico 88221

**DATE:** October 19, 2021

**REPLY TO  
ATTN OF:** CBFO:QAD:JL:JM:21-0933:UFC 2300.00

**SUBJECT:** Revised Audit Plan for Recertification Audit A-22-04 (Previously A-21-22), AMWTP Transuranic Waste Characterization and Certification Program

**TO:** Nicole Badrov, DOE-ID

Please be advised that an audit team from the U.S. Department of Energy (DOE) Carlsbad Field Office (CBFO) will conduct Waste Isolation Pilot Plant (WIPP) Hazardous Waste Facility Permit Attachment C6 Audit A-22-04 for recertification of the Advanced Mixed Waste Treatment Project (AMWTP) for contact-handled (CH) transuranic waste characterization activities. The audit is scheduled for November 1 – 4, 2021, and will be conducted in accordance with the attached audit plan.

The AMWTP activities for characterizing CH transuranic Summary Category Group (SCG) S3000 homogeneous solids, SCG S4000 soils/gravel, and SCG S5000 debris wastes will be evaluated during the audit.

Due to AMWTP's COVID-19 protocol with site access restrictions for visitors, audit team members will not travel to the AMWTP site and all audit activities will be conducted remotely via teleconference. Some waste characterization activities will be evaluated through video/livestreaming via Microsoft Teams platform. This will not be the normal method for performing recertification audits. The audit will be performed in accordance with this plan, unless additional changes emerge or restrictions are lifted that will allow for assessment of field activities. Representatives from the DOE/CBFO and the New Mexico Environment Department may be present to observe the audit remotely. In order to satisfy Waste Analysis Plan requirements, it is imperative that field evaluations be conducted at the site once AMWTP's site restrictions have been lifted.

Your representatives are requested to coordinate with the audit team and to provide access to AMWTP documentation and records for the audit team to conduct the audit. Please arrange to have cognizant personnel available to support the audit.

If you have any questions concerning the audit, please contact me at (575) 200-0716.

**JOE**  
**LOPEZ**

Digitally signed  
by JOE LOPEZ  
Date:  
2021.10.13  
16:13:03 -06'00'

Joe Lopez,  
Quality Assurance Specialist  
Quality Assurance Division  
Carlsbad Field Office

Attachment (1)

cc: w/attachment

J. Lorence, EM-3.113 \* ED  
 R. Toro, EM-3.113 ED  
 R. Knerr, CBFO ED  
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 K. Princen, CBFO ED  
 M. Brown, CBFO ED  
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 C. Flour, DOE-ID ED  
 T. Jenkins, DOE-ID ED  
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 J. Maupin, CTAC ED  
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 Site Documents ED  
 S. Sifuentes, SNL ED  
 CBFO QA File  
 CBFO M&RC

\*ED denotes electronic distribution

**CARLSBAD FIELD OFFICE  
AUDIT PLAN**

**Audit Number:** A-22-04

**Organization to be Audited:** Advanced Mixed Waste Treatment Project (AMWTP) Fluor Idaho, LLC

**Organizations to be Notified:** Fluor Idaho, LLC  
U.S. Department of Energy-Idaho Operations Office (DOE-ID)  
New Mexico Environment Department (NMED)  
U. S. Environmental Protection Agency (EPA)

**Date and Location:** November 1– 4, 2021  
Carlsbad, NM

**Audit Team:**

Joe Lopez	Carlsbad Field Office (CBFO) Quality Assurance (QA) Division Management Representative, Auditor/Technical Specialist, (C6 QA, WWIS/WDS, Software Quality Assurance)
Dustin Stegman	Audit Team Leader, CBFO Technical Assistance Contractor (CTAC)
Cindi Castillo	Auditor/ATL Support, CTAC (Organization, QA Program, Program Status, GSTR)
Rick Castillo	Auditor, CTAC (C6 QA, Quality Improvement, Corrective Actions, Nonconformances)
Tim Boswell	Auditor, CTAC (C6 QA, Training)
Kathy Hood	Auditor, CTAC (C6 QA, Document Control and Records)
Paul Gilbert	Auditor, CTAC (Container Management, M&TE, and Instrumentation)
Bob Blyth	Auditor, CTAC (Procurement and Graded Approach)
Prissy Yanez	Auditor, CTAC (RTR)
Eric Lyles	Auditor, CTAC (VE)
Steve Shafer	Auditor, CTAC (NDA)
Dick Blauvelt	Technical Specialist, CTAC (AK, Load Management)
Shelly Gomez	Technical Specialist, CTAC (VE & RTR)
Paul Gomez	Technical Specialist, CTAC (PL V&V)
Dale Dover	Technical Specialist, CTAC, (PL V&V)
Randy Fitzgerald	Technical Specialist/Auditor, CTAC (AK, Load Management)
Jim Oliver	Technical Specialist, CTAC (NDA/PDP)
Michel Hall	Technical Specialist, CTAC (NDA/PDP)

Wayne Ledford	Technical Specialist, CTAC (AK, Load Management)
Maria Escarcega	Technical Specialist-In-Training, CTAC (AK)

### **Audit Scope:**

The audit team will evaluate the continued adequacy, implementation, and effectiveness of the technical and QA activities performed by AMWTP for characterization of contact-handled (CH) transuranic waste summary category groups (SCGs) S3000 homogeneous solids, S4000 soils/gravel, and S5000 debris wastes.

The audit team will also verify that a technical review of the generator site's processes has been performed and any issues identified during the technical review have been resolved per DOE/WIPP-16-3564, *Generator Site Technical Review Procedure*.

Due to AMWTP's COVID-19 protocol with site access restrictions for visitors, audit team members will not travel to the AMWTP site and all audit activities will be conducted remotely via teleconference. Some waste characterization activities will be evaluated through video/livestreaming via Microsoft Teams platform. This will not be the normal method for performing recertification audits. The audit will be performed in accordance with this plan, unless additional changes emerge or restrictions are lifted that will allow for assessment of field activities.

In order to satisfy Waste Analysis Plan requirements, it is imperative that field evaluations be conducted at the site once AMWTP's site restrictions have been lifted. Transportation and Flammable Gas Analysis activities will not be included in the scope of this audit.

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 AMWTP documents will be based on the current revisions of the following documents:

- DOE/CBFO-94-1012, *CBFO 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-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:

- PLN-5198, *Characterization Plan for INL Transuranic Waste*
- PLN-5199, *Quality Assurance Project Plan*
- Related AMWTP 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**

- Organization/QA Program
- Nonconformances
- Personnel Qualification and Training
- Measuring and Test Equipment (M&TE)
- Software Version Installation
- Records
- Quality Improvement
- Work Processes
- Procurement
- Audits/Assessments

**Technical Activities**

- Project-level Data Validation and Verification (PL/V&V)
- Acceptable Knowledge (AK)
- Visual Examination (VE)
- Nondestructive Assay (NDA), including Performance Demonstration Program
- Container Management
- WIPP Waste Information System/Waste Data System (WWIS/WDS)
- Real-Time-Radiography (RTR)

**Schedule of Audit Activities:**

A pre-audit conference is scheduled for Monday, November 1, 2021 at 8:30 a.m. (MDT).

If needed, the audit team leader will conduct a management briefing with appropriate AMWTP management at 8:30 a.m. (MDT) on Tuesday, Wednesday, and Thursday, November 2-4, 2021.

A post-audit conference is scheduled for Thursday, November 4, 2021, at 3:00 p.m. (MDT).

All meetings will take place via teleconference.

**Prepared by:** DUSTIN STEGMAN Digitally signed by DUSTIN STEGMAN (Affiliate)  
(Affiliate) Date: 2021.10.13 12:31:12 -06'00' **Date:** \_\_\_\_\_  
Dustin Stegman  
CTAC Audit Team Leader

**Concurrence:** MICHEAL STAPLETON Digitally signed by MICHEAL STAPLETON  
Date: 2021.10.19 12:15:40 -06'00' **Date:** \_\_\_\_\_  
Darren Jolley, Director  
CBFO Quality Assurance Division

WIPP #	Process/Equipment Description	Applicable to the Following Waste Streams/Groups of Waste Streams
<b>PROCESSES TO BE EVALUATED FOR RECERTIFICATION</b>		
16IQ1	Nondestructive Assay IQ3 Procedures – CCP-TP-046, CCP-TP-047, and CCP-TP-048	Solids (S3000) Soils (S4000) Debris (S5000)
16MILCC2	Mobile ISOCs Large Container Counter (MILCC2) Procedures – CCP-TP-076, CCP-TP-077, and CCP-TP-048	Solids (S3000) Soils (S4000) Debris (S5000)
16DTC1	Dose-to-Curie (Radiological Characterization) Procedure – CCP-TP-504	Solids (S3000) – RH Soils (S4000) – RH Debris (S5000) – RH
16RR1	Real-Time Radiography Mobile Characterization System RTR #6 Procedures – CCP-TP-053 and CCP-TP-165	Solids (S3000) Soils (S4000) Debris (S5000)  Solids (S3000) – RH Soils (S4000) – RH Debris (S5000) – RH
16RHVE1	Visual Examination Procedure – CCP-TP-500	Solids (S3000) – RH Soils (S4000) – RH Debris (S5000) – RH
16VE1	Visual Examination Procedure – CCP-TP-113	Soils (S4000) Debris (S5000)
N/A	Acceptable Knowledge Procedure – CCP-TP-005	Solids (S3000) Soils (S4000) Debris (S5000)  Solids (S3000) – RH Soils (S4000) – RH Debris (S5000) – RH
N/A	Data Verification and Validation	Solids (S3000) Soils (S4000) Debris (S5000)  Solids (S3000) – RH Soils (S4000) – RH Debris (S5000) – RH

WIPP #	Process/Equipment Description	Applicable to the Following Waste Streams/Groups of Waste Streams
<b>PROCESSES TO BE EVALUATED FOR RECERTIFICATION</b>		
N/A	Quality Assurance Program	Solids (S3000) Soils (S4000) Debris (S5000) Solids (S3000) – RH Soils (S4000) – RH Debris (S5000) – RH
N/A	WIPP Waste Information System (WWIS)/Waste Data System (WDS) Procedures – CCP-TP-030 and CCP-TP-530	Solids (S3000) Soils (S4000) Debris (S5000) Solids (S3000) – RH Soils (S4000) – RH Debris (S5000) – RH