



June 8, 2022

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

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

**RE: NMED APPROVAL OF THE LAWRENCE LIVERMORE NATIONAL LABORATORY/ CENTRAL CHARACTERIZATION PROGRAM (LLNL/CCP) FINAL AUDIT REPORT A-21-25  
WASTE ISOLATION PILOT PLANT  
EPA I.D. NUMBER NM4890139088**

Dear Messrs. Knerr and Dunagan:

On October 14, 2021, the New Mexico Environment Department (NMED) received the Final Audit Report of the Lawrence Livermore National Laboratory/ Central Characterization Program (LLNL/CC) Audit A-21-25. 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-21-25 was to ensure the continued adequacy, implementation, and effectiveness of the LLNL/CCP waste characterization processes for characterizing contact-handled (CH) Summary Category Groups (SCGs) S3000 solids and S5000 debris wastes relative to the requirements of the WIPP Permit. To decrease the potential development, spread, and impact of Coronavirus-19 (COVID-19) a limited number of audit team members traveled to the LLNL site to review field activities. Other reviews were conducted remotely via teleconference.

The Final Audit Report consisted of the following items:

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

NMED observed Audit A-21-25 on August 10-12, 2021 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 audit team concluded that, for CH SCGs S3000 solids and S5000 debris wastes, the LLNL/CCP TRU waste characterization program procedures adequately address upper-tier requirements, were satisfactorily implemented, and effective in achieving the desired results.

Messrs. Knerr and Dunagan

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The Final Audit Report indicated that Real-time Radiography (RTR) was excluded from the scope of this audit as RTR 2 Unit has been decommissioned, disassembled, and returned to the vendor. There will be no RTR operations at LLNL for the foreseeable future. The Report also indicated that the audit team identified no Permit related concerns during the audit. Final Audit Report A-21-25 demonstrates that LLNL/CCP has implemented the applicable characterization requirements of the WAP during the applicable timeframe. NMED hereby approves LLNL/CCP Final Audit Report A-21-25 to include only those waste forms and processes evaluated by those recertification audit.

This letter 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,

**Rick Shean**  
Digitally signed by Rick Shean  
Date: 2022.06.08 13:09:25 -06'00'

Rick Shean  
Chief  
Hazardous Waste Bureau

cc: R. Maestas, NMED HWB  
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