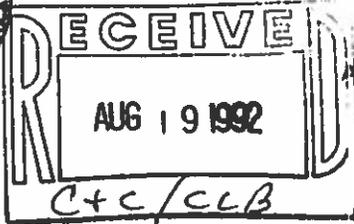




**Department of Energy**  
Field Office, Albuquerque  
P.O. Box 5400  
Albuquerque, New Mexico 87115



AUG 16 1992

Ms. Judith Espinosa, Secretary  
New Mexico Environment Department  
P. O. Box 26110  
Santa Fe, New Mexico 87502

Dear Secretary Espinosa:

This letter responds to comments and questions provided in your letter dated March 19, 1992, on the Westinghouse Hanford Company (WHC) "Quality Assurance Program Plan Certification of CH-TRU Waste," WHC-SD-WM-QAPP-005, Revision 0. The Waste Acceptance Criteria Certification Committee coordinated the enclosed disposition of your comments with WHC.

If you have any questions regarding this transmittal, please contact Les Gage of my staff at 845-5983.

Sincerely,

W. John Arthur, III  
Project Director  
WIPP Project Integration Office

Enclosure

cc w/enclosure:  
C&C File (ID9200012)  
N. Weber, NMED (2)  
L. Gage, WPIO



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Responses to Comments Provided by the  
New Mexico Environment Department on the  
"Quality Assurance Program Plan  
Certification of CH-TRU Waste,"  
WHC-SD-WM-QAPP-005, Revision 0

GENERAL COMMENTS

1. Comment: The title should reflect that the document pertains to the Hanford Site.

Response: The document number reflects the site to which the document belongs. There is no Waste Isolation Pilot Plant (WIPP) requirement to include the site name in the title.

2. Comment: As with other WIPP quality assurance documents, considerations should be made of RCRA regulatory requirements. If these considerations are made by the waste generator rather than WIPP, perhaps it would avoid having to back-track from WIPP.

Response: The applicable Environmental Protection Agency (EPA) Resource Conservation and Recovery Act (RCRA) requirements will be considered in Hanford's future submittal of a Site Quality Assurance Project Plan (QAPjP).

SPECIFIC COMMENTS

1. Comment: Page 15, Section 12.4. The statement is made that "Where no nationally recognized standard exists, the basis for calibration and subsequent development of a standard is documented." What wastes, either hazardous or radioactive, are being used at the Hanford Site that do not already have a recognized standard?

Response: There are no national standards for the calibration of assay equipment. The nondestructive assay units are calibrated with a source made up in an analytical laboratory. The records for these sources are maintained.

2. Comment: Page 17, Section 17.0. Quality Assurance Records. Record retention policy should require extending the retention period when records are involved in enforcement action. An example in New Mexico is the New Mexico Hazardous Waste Regulations (HWMR-6), which requires that records be kept a minimum of three years, but that period is automatically

extended during the course of any unresolved enforcement action (HWMR-6, Part III, 40 CFR section 262.40 (d). Pt. V, sec. 264.74 (b), Pt. VI, 265.74 (b). Several of the retention periods listed in Section 17.0 and Table 1, page 10 are long and would likely meet any retention requirements without additional retention option clauses. However, some retention periods may be too short, i.e., "do not require retention beyond the next WACCC audit" (audits are done annually); "for three years; and "until waste is emplaced at the WIPP facility." Hopefully enforcement actions will not take three years, but they can and have. Also, why call a retention period lifetime when it is not a lifetime? The footnotes to Table 1 qualify lifetime as "until emplacement at WIPP and a minimum of 25 years." For current waste, once WIPP is operational, the emplacement period could be fairly short.

Response: It is not the intention of WHC to destroy any record involved with the TRU waste certification activities at Hanford. The retention times in this plan meet these WIPP-WAC requirements. The WAC requirements concerning certification records are classified into three categories:

- "Those relating to current operations (equipment calibrations) which must be available for periodic WACCC audits, but which do not require retention beyond the next WACCC re-audit."
- "Those which provide detailed information on the processing of waste . . . , which do not require retention after the waste is permanently emplaced in the WIPP . . ."
- "Those which are basic to the certification process and should be considered permanent (i.e., retained 25 years or longer), such as a process batch or container inventory records, NDA/NDE records, and certification statements." (WIPP/DOE-120, Revision 2, pages 12-13).

3. Comment: Appendix A: Document References, page A-2. There are no references to EPA documents such as 40 CFR or SW-846. Perhaps, some of these references do, in turn, reference EPA documents. If these are the documents that must be followed to ensure compliance, there should be some mention of EPA documents.

**Response:** The reference documents in this appendix are the next level of documents in support of the TRU waste at WHC; these supporting documents include a list of references. The documents referenced in the supporting documents also include a list of references. This process is repeated until all Department of Energy, Department of Transportation, Environmental Protection Agency, etc., documents that are applicable are referenced in Hanford documents.

4. **Comment:** Figure 1: Figure 1 is confusing. Do all the Directors report directly to the Executive Vice President? Is anyone under the Vice Presidents? Are Directors equal in authority to the Vice Presidents? Although Figure 2 uses the same format, it is less confusing because of an additional horizontal line showing that in addition to command of the second line units, ESH & QA also has direct-line command of the Waste Tank ESH & QA and ESQ units.

**Response:** The organizational diagrams are included to show that there is an organizational structure. Directors and Vice Presidents report to the Executive Vice President/President and are equal in authority.



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