



**WESTINGHOUSE ELECTRIC CORPORATION
WIPP PROJECT - CARLSBAD, NM**

COMPLIANCE AND PERMITTING

FACSIMILE TRANSMITTAL SHEET

FAX NUMBER: (505) 234-8854

PAGES - INCLUDE COVER	2	DATE	12/18	TIME	4:20pm
TO:	Steve Zappel				
LOCATION:	NMED				
PHONE:	Fax: (505) 827-1544				
FROM:	Karen Day				
LOCATION:	WIPP SITE - SUPPORT BUILDING - CARLSBAD, NM				
PHONE:	(505) 234-8720				

SPECIAL INSTRUCTIONS: Steve -

Here are some talking points
on the (2) Chapter C issues for
tomorrow's conf. call.

Karen Day



Dec. 13. 1995 5:53PM

No. 1143 P. 2/2

Response to Radiography Training Comment

In response to comments received from NMED and EPA concerning adequate training for radiography personnel, several modifications were made to the QAPP in Revision 0. Specifically, Table 1-4 was revised to include a requirement for site-specific training on matrix parameter categories and waste material parameters, with requalification every two years, for all radiography operators. In addition, Section 10.3 was revised significantly to include specific training requirements for radiography personnel. These revisions included standardized training based on existing industry standard training requirements and ASME NQA-1, Element 2. Each site must train their operators on the specific waste generating practices, typical packaging configurations, and associated waste material parameters expected in each matrix parameter category found at that site. Each site must use a training drum containing variously sized containers and simulated waste types. This training drum must be periodically scanned by each operator and the videotape reviewed by a supervisor to ensure operator interpretations remain consistent and accurate. It is important to understand that each site requires a certain degree of latitude in developing a training program due to site-specific differences in equipment, waste configurations, and the level of waste characterization efforts. Certain sites use digital radiography equipment which is more sensitive than real-time radiography equipment. The particular type of waste (i.e., physical form, packaging configurations) at each site will vary and so operators need to be trained on appropriate waste types. Certain sites may be characterizing waste at a faster pace or more concentrated schedule than others. This will impact the type and duration of training required for operators. Each of these issues require somewhat different site-based training requirements.

Response to Duplicate Comment

The requirement to collect and sample co-located cores was included in the QAPP to be consistent with the SW-846 requirement to collect field duplicates. However, SW-846 does not specify a numeric acceptance criteria (e.g., < 25 RPD) for duplicate results. Because waste is being characterized on a waste stream basis, the variability within a drum is not as important as variability between drums. The variability between drums is addressed in the random selection and sampling procedure in that the number of samples collected from a waste stream is dependent on the highest coefficient of variation observed for target analytes.