

United States Government

Department of Energy

memorandum

Carlsbad Area Office
Carlsbad, New Mexico 88221

DATE: August 12, 1997

REPLY TO: CAO:NTP:RAS 97-1825 UFC 5822
ATTN OF:

SUBJECT: Requirement for Quality Assurance Program Plan (QAPP) Headspace Gas Standards

TO: File

During recent site audits by the U. S. Department of Energy Carlsbad Area Office (DOE/CAO), an inconsistency was identified between the *Transuranic Waste Characterization Quality Assurance Program Plan (QAPP), Revision 0. Interim Change* and the *Transuranic Waste Characterization Sampling and Analysis Methods Manual, Revision 1.0 (Methods Manual)* regarding the use of NIST traceable standards for headspace gas analyses. The CAO has reviewed this requirement and determined that headspace gas standards must only be purchased as "certified" or "certified by the manufacturer."

The U. S. Environmental Protection Agency (EPA) does not require the use of NIST traceable standards in its *Test Methods for Evaluating Solid Waste, Physical/Chemical Methods* or *Compendium Method TO-14*. Based on this information, the CAO has determined that the *Methods Manual* is incorrect. The use of NIST traceable or "nationally recognized standards" is not required for hydrogen, methane, or volatile organic compound headspace gas analyses.

CAO will revise the *Methods Manual* (Procedures 430.1, 430.2, 440.1, and 430.7) to specify the requirement to use certified standards rather than NIST traceable standards. Until the revised documents are issued to the sites, this letter serves to document the inconsistency between program requirements and require only the use of certified gas standards to meet program requirements. If you have any questions regarding this requirement, please contact Butch Stroud at (505) 234-7483.



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