

# memorandum

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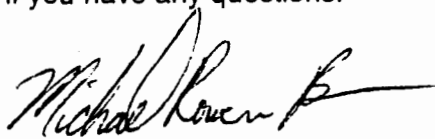
DATE: April 29, 1999

REPLY TO:  
ATTN OF: CAO:OWDO:MRB 99-0910 / UFC 5822  
SUBJECT: LANL Equivalencies

TO: Christopher Murnane, LAAO

DOE-CAO has reviewed a number of Records of Variance currently referenced by the LANL QAPjP. Based on our review, and earlier audits of LANL waste characterization operations, CAO has determined the processes described in the variances provide an equivalent quality of data. Any further changes require approval of CAO. See Table 1 for a summary of CAO's review.

Please contact me at 505-234-7476 if you have any questions.



Michael R. Brown  
Waste Characterization Manager  
Carlsbad Area Office

Attachment (1)

cc w/attachment:  
Butch Stroud, CAO  
Marc Italiano, CAO  
Kent Hunter, CAO  
Sam Vega, CAO  
Beth Bennington, CAO  
Jerry Wells, ID  
Lam Xuan, RFFO  
Dale Ormond, SR  
Mark French, RL  
Loretta Greene, CTAC  
Pam Rogers, LANL



**Table 1**

<b>ROV number</b>	<b>CAO Disposition</b>
ROV-97-003	CAO approves the use of glass syringes for headspace gas sampling.
ROV-97-007	CAO approves the use of an alternate means of tuning a radiography system. The use of a steel block with a 2-2T hole is not required. LANL is required to perform daily system checks using an actual test drum.
ROV-97-009	CAO approves the use of the site specific waste generator code as described in this variance.
ROV-97-010	CAO approves the use of electronic waste container tracking. The tracking system as described in this variance shall be appropriately documented and changes controlled.
ROV-97-011	LANL's request is approved subject to the following conditions: All sampling shall be conducted within the temperature range specified in the QAPP; brief excursions to move containers as required are approved given that the drum temperature will be stabilized. Refer to DOE Memo CAO:NTP:RAS 98-1434 for further guidance.
ROV-97-012	CAO approves the use of SUMMA or SilcoSteel canisters and Tedlar bags for short-term storage of gas samples provided all sample handling requirements of the QAPP are met such as sample labeling and chain of custody.
ROV-97-013	CAO approves the random sampling method described by LANL in their QAPjP.
ROV-97-014	LANL may file their NDA calibration by date and record number provided this information is traceable to testing batch number.
ROV-97-015	Radiography operators may record volumes of waste material rather than weights. The weights can be estimated or added from site-specific tables. No adjustments to the weight should be made after the initial estimate and check are complete.
ROV-97-016	Tedlar bags may be used for laboratory blanks rather than SUMMA canisters.
ROV-97-017	LANL may file raw data electronically by file name provided it is traceable to the data batch number.
ROV-97-019	LANL may use nitrogen purge rather than solvents for cleaning sampling needles.
ROV-97-021	LANL is not required to concentrate samples unless necessary to achieve adequate results.
ROV-97-026	LANL may track RTR and VE data to a number traceable to the correct waste stream.
ROV-97-027	The purpose of VE is to verify radiography. LANL may allow their VE personnel to review radiography results prior to performing VE for ALARA purposes.