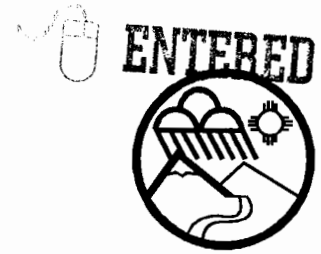




GARY E. JOHNSON  
GOVERNOR

State of New Mexico  
**ENVIRONMENT DEPARTMENT**  
*Hazardous & Radioactive Materials Bureau*  
2044 A Galisteo Street  
P.O. Box 26110  
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(505) 827-1557  
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PETER MAGGIORE  
SECRETARY

July 7, 1999

Ines Triay, Manager  
Carlsbad Area Office  
Department of Energy  
P. O. Box 3090  
Carlsbad, New Mexico 88221

Dear Dr. Triay:

**RE: Interim Audit Report**

The New Mexico Environment Department (NMED) has reviewed the Interim Audit Report outline provided by Mr. Butch Stroud of your staff on June 16, 1999 (attached). While this revised outline appears to address, in very broad terms, the elements discussed in our telephone conference earlier that day, it does not include much of the detail which will be required in an actual audit report. For example, other documentation may be required in the report as specified in the revised Draft Permit (November 13, 1998), Attachment B6, page B6-6, lines 12-20, such as "audited procedures and *other applicable documents* which provide evidence of WAP [Waste Analysis Plan] implementation" (emphasis added). NMED expects DOE to provide a significantly greater level of detail in any audit report submitted for review than is currently indicated in the attached outline.

As specified in Section II.C of the Memorandum of Agreement (MOA) between DOE and NMED dated June 17, 1999, NMED and DOE must agree on the contents of the Interim Audit Report before DOE provides NMED with such information. NMED agrees with the content of the attached Interim Audit Report outline, and views the submittal of any audit report prior to issuance of a final Hazardous Waste Facility Permit as an opportunity to assist DOE in improving the quality and content of these reports. However, any Interim Audit Report provided to or reviewed by NMED under the MOA will not satisfy the requirements of the final Permit, since the WAP requirements will likely change with its issuance.

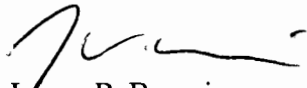
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Dr. Triay, DOE/CAO  
Page 2  
July 7, 1999

If you have any questions, please contact Steve Zappe of my staff at (505) 827-1560, x1013.

Sincerely,



James P. Bearzi  
Chief  
Hazardous and Radioactive Materials Bureau

Attachment

cc: Paul Ritzma, NMED  
Greg Lewis, NMED  
John Tymkowich, HRMB  
Steve Zappe, HRMB  
Susan McMichael, NMED OGC  
David Neleigh, EPA Region 6  
Mary Kruger, EPA ORIA  
Connie Walker, TechLaw  
WIPP File - Red '99

**INTERIM AUDIT REPORT**  
**RCRA DRAFT PERMIT**  
**Appendix B6 Evaluation**

**I. Purpose**

- A. To determine the current level of generator storage site implementation and compliance to the Waste Analysis Plan (WAP) in the NMED Draft Permit dated November 13, 1998 through the CAO audit process using the Draft Permit Attachment B6 checklist.
- B. To identify areas requiring further assessment to determine compliance with the WAP using the Attachment B6 checklist.
- C. To provide sufficient corrective actions to any deficient areas to assure compliance.

**II. Process**

- A. Evaluate the RCRA Draft Permit Appendix B6 against the generator/storage site's TRU Waste programmatic documents and implementing procedures, and CAO Audit reports.
  - 1. A crosswalk will be conducted between each "Question" posed in the B6 Checklist and the generator/storage site's program documents and implementing procedures.
  - 2. A determination will be made regarding the adequacy of the generator/storage site's documents in satisfying the checklist questions. Those documents that adequately address the requirement will be so indicated with a "Yes"; however, in cases where the documents do not appear to be adequate a "No" will be indicated along with an explanation and this will become part of the on-site audit.
  - 3. The generator/storage site's annual reevaluation audit and any recent relevant audits will be used to baseline the implementation of checklist requirements. Audit records, checklists, and interviews will be referenced to provide examples of implementation. Because CAO audits are conducted on a sample of requirements and activities, it is expected that some checklist items will need further evaluation at the on-site audits.
- B. Identify any current indeterminates or deficiencies.
- C. Prepare an audit plan focusing on the disconnects identified in Steps A.2 and 3.

**III. Audit**

- A. Audit Plan – Team Selection, Dates, Notifications, Purpose & Scope, Schedule (NMED will be invited to participate)
- B. Conduct of Audit
- C. Preliminary Results

**IV. Interim Audit Report**

- A. Assessment Report
  - 1. Purpose/Scope
  - 2. Dates and Description of Audits Used for the Assessment
  - 3. Summary of Compliance with Attachment B6
  - 4. Narrative (organized by the sections of Attachment B-6 including organizations/activities audited and a detailed description of the process followed and determinations made)
  - 5. Requested Response Date

- B. Corrective Action Report Documentation
  - 1. Corrective Action Reports
  - 2. Site Corrective Action Plans
  - 3. Corrective Action Closure Documentation
- C. Completed Draft Permit Attachment B6 Checklist

V. Additional Documentation

- A. Relevant Site Procedures (will be provided to NMED as soon as practical before issuance of the Interim Audit Report)