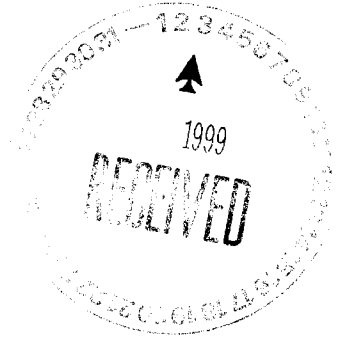




Department of Energy

Carlsbad Area Office
P. O. Box 3090
Carlsbad, New Mexico 88221

July 29, 1999



Mr. James P. Bearzi, Chief
Hazardous and Radioactive Materials Bureau
State of New Mexico Environment Department
P. O. Box 26110
Santa Fe, NM 87502-6110

Dear Mr. Bearzi:

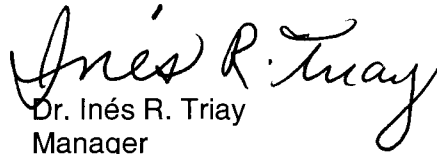
In my letter to you dated July 9, 1999 I informed you that our legal counsel was reviewing the Interim Audit Report outline. This review has been completed and has resulted in three minor changes to the document. The changes are outlined below:

1. Section I. A. changed "and compliance to the Waste Analysis Plan" to "and consistency with the Waste Analysis Plan."
2. Section I. B. changed "to determine compliance with the WAP" to "to establish consistency with the WAP."
3. Section I. C. changed "to assure compliance" to "to assure consistency."

With these changes the United States Department of Energy (DOE) agrees to the contents of the attached Interim Audit Report outline. As per Section II C. of the June 16, 1999 Memorandum of Agreement, DOE will provide NMED with all Interim Audit Report information available within 45 days of our receiving your concurrence with the attached outline.

Thank you for all your help and patience with this issue. If you have any questions or would like to discuss this issue please contact me at (505) 234-7300 or Kent Hunter of my staff at (505) 234-7456.

Sincerely,


Dr. Inés R. Triay
Manager

Enclosure

cc w/o enclosure:
K. Hunter DOE
S. Zappe NMED
D. Ruge, HQ
P. Detwiler, HQ
S. VanCamp, HQ



INTERIM AUDIT REPORT
RCRA DRAFT PERMIT
Appendix B6 Evaluation

I. Purpose

- A. To determine the current level of generator storage site implementation and consistency with 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 establish consistency with the WAP using the Attachment B6 checklist.
- C. To provide sufficient corrective actions to any deficient areas to assure consistency.

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 indeterminate 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

VI. 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 B6 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

IV. Additional Documentation

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