



Department of Energy

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

August 16, 1999

ENTERED



Stephen D. Page, Director
Office of Radiation and Indoor Air
U.S. Environmental Protection Agency
Washington, D.C. 20460

RE: Response to Findings in EPA Inspection Report EPA-LANL-6.99-8

Dear Mr. Page:

Enclosed are the Carlsbad Area Office (CAO) response to the four (4) findings requiring a response that are contained in the Environmental Protection Agency (EPA) inspection report for EPA inspection No. EPA-LANL-6.99-8 of the Los Alamos National Laboratory (LANL), June 14-18, 1999.

CAO sincerely appreciates the professional and constructive manner in which the EPA inspection team performed their inspection activities.

If you have any questions or need additional information, please contact Sam Vega of my staff at (505) 234-7423.

Sincerely,

Samuel A. Vega
Quality Assurance Manager
Carlsbad Area Office

Enclosure

cc w/enclosure:
K. Hunter, CAO
L. Chism, CAO
B. Bennington, CAO
M. Kruger, EPA
→ S. Zappe, NMED
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J. Ptacek, CTAC



Response to Findings in EPA Inspection Report EPA-LANL-6.99-8

The findings and the CAO responses are numbered in the same manner as section 9.1 of the EPA Inspection Report

1. *Section 5.4.2 of the CAO QAPP states, "Once a site-specific miscertification rate can be determined, that miscertification rate must be used to determine the number of waste containers that must be visually examined. The miscertification rate must be determined each year based on the results of certification activities over a minimum of 12 months." LANL has not performed the necessary calculations to determine the percentage of miscertified waste containers. EPA requires a response to this finding.*

The CAO audit team also identified this deficiency and issued CAR 99-081. CAO will track this deficiency from LANL response submitted through CAO approval and completion.

2. *The site is not completing the "Audio/Video Record Form" as required by TWCP-DTP-1.2-002, R.1, 5/12/99. The site stated that they have not been completing this form and that they were going to modify the procedure to no longer require completion of this form. EPA requires a response to this finding.*

The CAO audit team also initially identified this as a concern. Investigation revealed that all WIPP program required information on this form is contained either in the videotape record itself or in the Waste Visual Examination and Repackaging Form 2A/B (TWCP-DTP-1.2-001, Rev.6, 12/14/98) which is the primary record document. The local requirement for the redundant Audit/Video Record Form had been deleted in TWCP-DTP-1.2-001, but had not yet been deleted from TWCP-DTP-1.2-002. Procedure TWCP-DTP-1.2-002 was revised on 6/16/99 to delete the requirement for the Audio/Video Record Form. CAO concurs that this satisfactorily resolves the concern.

3. No response required to Finding No. 3.

4. *Table 2 of TWCP-QP-1.1-034, Rev.3, "WWIS Data Entry Spreadsheet Parameters" requires the WWIS entry of weights for 14 individual waste material parameter types; however, LANL has modified its RTR procedures to require operators to record information using six categories. The two requirements are not consistent. EPA requires a response to this finding.*

The CAO audit team identified this concern as Observation number 6 in the audit report for A-99-04, and required a response from LANL. To date all waste shipped from LANL to WIPP has used material parameter data determined by visual examination to complete the WWIS data fields. As a result, there has not been an inconsistency in the waste material parameter data input to the WWIS. Prior to use of material parameter data determined via RTR, LANL must respond to Observation number 6 and demonstrate a satisfactory method for converting and reporting the waste material parameter data derived from RTR. Upon receipt of a method that is determined to be acceptable.

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5. *TWCP-QP-1.1-034, Rev. 3, does not reflect the current practice that site personnel no longer prepare approval or rejection reports. EPA requires a response to this finding.*

The CAO audit team also initially identified this as a concern. Investigation revealed that the most current approval/rejection status is continuously available on the WWIS and that locally maintaining this information (redundantly) on approval/rejection forms serves little purpose and is not driven by WIPP program requirements. LANL NCR 99-220 was generated on 6/16/99 to document the failure to implement this local requirement and an interim change (IC1) to TWCP-QP-1.1-034, Rev. 3, was generated on 6/16/99 to remove the use of approval/rejection forms. CAO concurs that this satisfactorily resolves the concern.