

Subject: PDP Plan Changes and the WAP

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A "for information only" exchange--

The WAP Section B3-3 QAO on comparability for headspace gas sampling requires laboratories analyzing WIPP samples to "successfully participate" in the CAO's Performance Demonstration Program (p. B3-10). The original Headspace Gas PDP Plan (DOE/CAO-95-1076) required any laboratory that fails to meet the PDP criteria for accuracy or precision to cease analytical operations for WIPP samples (see Rev. 0 paragraph 6.2.5.6.2, p. 25). This offers a logical interpretation of what it means to "successfully participate" in the program; if the PDP criteria are met, then the lab has met the WAP QAO. If it does not meet the PDP criteria then it has not met the QAO.

Revision 1 (April 14, 1999) no longer requires laboratories to cease analysis of WIPP samples until a successful PDP cycle has been obtained; under Revision 1 laboratories may "choose to proceed at risk", though any data obtained "may be found unacceptable to WIPP" (Section 5.2.5 p. 26). The requirement to "successfully participate" in the PDP can now seemingly be achieved despite failure to meet PDP criteria.

There are also no statements as to what would cause the WIPP to consider data to be unacceptable.

The PDP Plan for analysis of solidified wastes (DOE/CAO-95-1077) contains a similar shift in wording between Revision 1 and Revision 2 (Revision 2 is also dated April 14, 1999).

1. Was the NMED informed of the change to the PDP requirements?
2. Was the NMED provided with Revision 1 of the heaspace gas PDP Plan and Revision 2 of the PDP Plan for solidified wastes? (The EEG had to find out the revisions had been issued, and then request them.)
3. Was it the intent of the Permit that "successful participation" in the PDPs meant meeting the PDP criteria?

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