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PETER MAGGIORE
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DEPUTY SECRETARY

April 10, 2001

Dr. Inés Triay, Manager
Carlsbad Field Office
Department of Energy
P.O. Box 3090
Carlsbad, New Mexico 88221-3090

Mr. John Lee, General Manager
Westinghouse TRU Solutions LLC
P.O. Box 2078
Carlsbad, New Mexico 88221-5608

RE: NMED APPROVAL OF SRS FINAL AUDIT REPORT, AUDIT A-01-01
WASTE ISOLATION PILOT PLANT
EPA I.D. NUMBER NM4890139088

Dear Dr. Triay and Mr. Lee:

On January 2, 2001, NMED received the initial Final Audit Report of the Savannah River Site (SRS), Audit Number A-01-01 (**Audit Report**), from the Department of Energy's Carlsbad Field Office (CBFO). CBFO and Westinghouse (**the Permittees**) were required to submit this Audit Report under the Waste Isolation Pilot Plant (WIPP) Hazardous Waste Facility Permit as specified in Permit Condition II.C.2.c. The intended scope of this audit was to evaluate the adequacy, implementation, and effectiveness of the SRS waste characterization processes for retrievably stored contact-handled debris waste relative to the requirements of the WIPP Permit. NMED delayed extensive review of the Audit Report until the Permittees submitted a revised version of the Audit Report on February 26, 2001, which contained the six-part B6 checklist.

The Audit Report documentation submitted to NMED consisted of the following items:

- a narrative report (redline/strikeout and clean)
- completed copies of relevant Permit Attachment B6 checklists
- final SRS standard operating procedures (electronic and hardcopy)
- corrective action reports and items corrected during the audit

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- objective evidence examined during the audit
 - general information
 - acceptable knowledge
 - headspace gas
 - real time radiography
 - visual examination

NMED has examined the Audit Report for evidence of compliance with the requirements of Permit Conditions II.C.2 (Audit and Surveillance Program) and II.C.1 (Waste Analysis Plan). NMED representatives observed the SRS audit on November 7 - 16, 2000, and specifically evaluated the Audit Report for compliance with the following permit requirements:

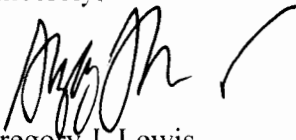
- Permit Condition II.C.2.a (*Requirement to Audit*) - the Permittees shall demonstrate to the Secretary that the generator/storage sites have implemented and comply with applicable requirements of the WAP by conducting an audit of the generator/storage sites as specified in Permit Attachment B, Section B-4b(1)(iii), and Permit Attachment B6 (Waste Isolation Pilot Plant Permittees' Audit and Surveillance Program), and as required by 20 NMAC 4.1.500 (incorporating 40 CFR §264.13).
- Permit Condition II.C.2.c (*Final audit report*) - the Permittees shall provide the Secretary a final audit report as specified in Permit Attachment B6. The final audit report shall include all information specified in Permit Attachment B6, Section B6-4, and: (i) A detailed description of all corrective actions and the resolution of **any corrective action applicable to WAP requirements, including re-audits if required**; (ii) documentation necessary for the Secretary to determine if the corrective action was resolved.

Attached are NMED's general comments based upon review of the submitted information. Although the Permittees sought approval for all SRS retrievably stored contact-handled debris waste, the procedures and objective evidence in the Audit Report failed to support this broad determination. While some procedures may be general enough to encompass all debris, others appear to specifically restrict the procedure to a single waste stream. NMED concludes that the Audit Report and supplemental information adequately demonstrate that SRS has implemented the applicable characterization requirements of the WAP only for the individual waste stream SR-T001-221F-HET. Furthermore, NMED does not believe a limited approval would constrain shipments from SRS because the waste characterization infrastructure observed during the audit did not appear to be capable of sustaining significant throughput. Therefore, NMED approves the Permittees' Final Audit Report for SRS Audit A-01-01 **for this waste stream only**.

Dr. Inés Triay
Mr. John Lee
April 10, 2001
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If you have any questions regarding this matter, please contact me at (505) 827-1758.

Sincerely,



Gregory J. Lewis
Director
Water and Waste Management Division

GJL:soz

Attachment

cc: James Bearzi, NMED HWB
John Kieling, NMED HWB
Steve Zappe, NMED HWB
Susan McMichael, NMED OGC
R. Lewis Shaw, SC DEHC
David Neleigh, EPA Region 6
Mary Kruger, EPA ORIA
Connie Walker, TechLaw
Matthew Silva, EEG
Don Hancock, SRIC
Joni Arends, CCNS
File: Red WIPP '01

**NMED COMMENTS ON THE
FINAL AUDIT REPORT OF THE
SAVANNAH RIVER SITE (SRS)**

1. The body of the SRS Final Audit Report (**Audit Report**) appears to generally address applicable elements, but checklist element responses could be improved:
 - Audit activities and results, as presented on the checklists and TABs, did not always reflect the thoroughness of events or activities as observed by NMED.
 - Examples of implementation were sometimes incomplete.
 - The Audit Report did not discuss how the actual statistical process associated with calculation of the miscertification rate was observed and assessed.
 - The Audit Report should more thoroughly discuss how the specified NCRs and TABs addressed waste incompatibilities.

2. NMED notes that SRS developed many technical procedures that were written for specific waste streams. This constrained the ability of the audit team to evaluate the applicability of these procedures to a broader spectrum of debris waste, and ultimately resulted in the limited scope granted by this approval. Future audits will require that similar procedures be written, approved, and audited. NMED believes the site understands that the audit approval would have been broader if the waste stream-specific procedures had been written more generically. Nevertheless, new procedures will have to be written and audited in order to expand the universe of approvable waste streams.

3. During the audit, NMED observers noted that the headspace gas (**HSG**) sampling was specifically staged for the audit, using pre-assembled containers that were sampled rather than actual waste containers. While this approach adequately demonstrated general site capabilities, NMED strongly urges DOE to consider re-examining the HSG processes in the very near future to ensure that there are no issues associated with sampling actual waste containers, and that HSG be a focus of future recertification audits. This suggestion is supported by the NMED observation that the initial HSG sampling event had to be discontinued because the drum clamp used by SRS would not adequately affix to the drum. Although the appropriate procedures were in place to compensate for and correct the problem, DOE re-observation of an actual waste sampling event would lend more credence to the HSG sampling process. Also note that the Audit Report should have mentioned this problem and the manner in which it was resolved.

4. NMED suggests that procedure WP-AP-0002 (WIPP Disposal Program Acceptable Knowledge) be revised to include more requirements of the SRS QAPjP, because the SRS QAPjP better reflected WAP requirements and it didn't appear that site personnel referenced the QAPjP for procedural information, relying instead on just WP-AP-0002.

5. The acceptable knowledge (AK) processes, documents, and records could be improved:
 - Container Discrepancy Forms are used to identify discrepant AK data, but criteria for management of discrepant information (i.e., resolution of discrepant AK information) is not thoroughly discussed. Specifically, criteria for data management when a waste matrix code assignment error, hazardous waste code reassignment, AK data discrepancies, etc., are identified must be included in WP-AP-0002 procedures (or other applicable procedures appropriately referenced by WP-AP-0002)
 - With respect to Waste Stream SR-T001-221F-HET, detailed AK is available on a drum-by-drum basis as was determined during the traceability analysis element of the audit. However, the AK Summary Report does not reflect this information directly or through specific reference, but instead only references a single container's TRU Waste Package Data as an example (Reference 76). This is problematic in that ineffective supplemental data acquisition and use could result. The AK Summary should have included all drum-specific AK information in a single reference, and this information should have been adequately rolled up to the AK Summary level.
 - The AK Technical Expert stated that the definition of waste stream was obtained from the TRU Waste Baseline Inventory Report, rather than using the waste stream definition within the WAP. This could be problematic if the site uses definitions or designations that are not WAP compliant, and SRS should modify appropriate documentation to address this issue.
 - WP-AP-002 and the SRS QAPjP must recognize that supplemental data collection is not optional.

6. The WWIS manual data entry process observed at SRS was both tedious and very time consuming, and appears to be a bottleneck in the waste characterization and certification process. Items that could be improved include the training and use of several personnel to perform the data entry duties, the use of spreadsheets for simplified data entry, and the implementation of an automated data entry system.