



**Department of Energy**  
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ENTERED

JUN 18 2004



Mr. Steve Zappe  
Hazardous Waste Bureau  
New Mexico Environment Department  
2905 Rodeo Park Drive East, Bldg. 1  
Santa Fe, New Mexico 87505-6303

Subject: Transmittal of a Revised Certification Audit Report (B6 Checklist), for the Hanford Site, Follow-Up Solids, Audit (A-04-06)

Dear Mr. Zappe:

This letter transmits the revised final audit report B6 checklists for the Hanford Site Audit A-04-06. The revised B6 checklists address the issues identified in a letter from the New Mexico Environment Department (NMED) dated June 9, 2004. Also enclosed with this letter are the responses to the comments contained in the enclosure to the letter.

If you have any questions concerning this revised final audit report, please contact Ms. Ava L. Holland at (505) 234-7423.

Sincerely,

R. Paul Detwiler  
Acting Manager

Enclosure

cc: w/enclosure  
C. Walker, Techlaw  
K. Dunbar, WTS (Operating Record)  
CBFO QA File  
CBFO M&RC



Mr. Steve Zappe

-2-

JUN 18 2004

cc: w/o enclosure

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**NMED COMMENTS AND THE CBFO RESPONSES TO THE COMMENTS ON THE HANFORD SITE, FOLLOW-UP SOLIDS, FINAL AUDIT REPORT A-04-06**

The following contains the CBFO responses to each of the NMED comments on the Hanford site, follow-up solids, Final Audit Report A-04-06.

1. Item 9 cites procedure WMP-400, Section 7.1.1, paragraphs 4.2 - 4.3. The question does not appear to be answered.

*Response: Procedure WMP-400, Section 7.1.1, paragraphs 4.2 – 4.3 does address the question in item 9, in that it depicts all the DQO information and WSPF information that is required. It also describes reconciliation and discrepancy resolution. This procedure, along with WMP-400, Section 7.1.9, paragraphs 4.6 – 4.7 (also cited), and WMP-400, Section 7.1.4 and 7.1.6 (all) describe required waste stream data and the appropriate steps necessary to resolve incompatibility issues. Procedures WMP-400, Sections 7.1.4 and 7.1.6 were added to the item 9 of the B6-1 checklist. Procedure WMP-400, Section 7.1.8 also addresses this question, however, was not added as it was previously cited in the original A-03-14 B6 report and checklist.*

2. Item 15 cites procedure WMP-400, Section 7.1.1, paragraph 4.3.1. The question does not appear to be answered.

*Response: The typographical error has been corrected. The correct procedure paragraph should read: 4.2 (all), in lieu of 4.3.1, and does address the question.*

3. Item 22 cites procedure WMP-400, Attachment 1. Should Attachments 2 and/or 3 be cited instead?

*Response: The typographical error has been corrected. The correct procedure and paragraph are: WMP-400, Section 7.1.1, paragraph 4.1.1 (4). Incomplete and incorrect references have been deleted.*

4. Item 29 cites procedure WMP-400, Section 7.1.1. Although the question is addressed, there is no mention of repackaged waste.

*Response: While the term “repackaged waste” is not quoted in the procedures cited (WMP-400, Sections 7.1.1 and 7.1.9) - The activities described therein, do apply to repackaged waste, as well as newly generated and retrievably stored. Procedure WMP-400, Section 7.1.4 also describes statistical solid sampling requirements and has been added as a reference to this B6 checklist item. Also, the original recertification audit (A-03-14), addressed repackaged waste.*

5. Items 32 and 38 cite procedure FSP-PFP-5-8, Volume 2, Section 4.3.3 as TS review. The cited section does not refer to TS review.

*Response: The typographical errors have been corrected. The incorrect procedure references were deleted and replaced with: FSP-PFP-5-8, Volume 2, Section 16.2, paragraph 4.3 (all).*

6. Items 33 and 39 cite procedure FSP-PFP-5-8, Volume 2, Section 4.3.4, as QAO review. The cited section does not refer to QAO review.

*Response: The typographical errors have been corrected. The incorrect procedure references have been deleted and replaced with: FSP-PFP-5-8, Volume 2, Section 16.2, paragraph 4.3 (all).*

7. Items 34 through 36 cite procedure ZO-162-082. The cited procedure was not included with the report.

*Response: Typographical errors have been corrected. The cited referenced procedure should read: ZO-160-082 in lieu of ZO-162-082.*

8. Item 46 cites procedure ZO-160-082 Section 3.5.13. Shouldn't the cited section include all of 3.5?

*Response: Yes, the referenced paragraph should read: 3.5 (all). Correction made on item 46 of the B6-1 checklist.*

9. Items 53 and 74 cite procedure WMP-400, Section 1.1, while question 53 also cites 4.0 Note 1.2. The cited procedure is included with the report but not Section 1.1.

*Response: The typographical errors have been corrected and the incorrect references, deleted. There is no procedure WMP-400, section 1.1. The correct procedures are: WMP 400, Section 7.1.5 for Item 53, and WMP-400, Sections 7.1.1 and 7.1.9, for item 74.*

10. Item 56 cites procedure WMP-400, Section 4.2. The cited procedure is included with the report but not Section 4.2.

*Response: The typographical error has been corrected and the incorrect reference deleted. There is no procedure WMP-400, Section 4.2. The correct procedure and paragraph is: WMP-400, Section 7.1.1, para. 4.2 (all).*

11. Items 56a, 56b, 58, 60 and 61 cite procedure WMP-400, Section 4.3.2. The cited procedure is included with the report but not Section 4.3.2.

*Response: The typographical errors have been corrected and the correct procedure and paragraphs noted. There is no procedure WMP-400, Section 4.3.2. The correct procedure and paragraphs are cited.*

12. Item 62 cites procedure WMP-400, Section 3.1. The cited procedure is included with the report but not Section 3.1.

*Response: The typographical errors have been corrected. There is no procedure WMP-400, Section 3.1. The correct procedure and paragraph are: WMP-400, Section 7.1.1, paragraph 4.3.2.*

13. Item 79 cites procedure WMP-400, Section 7.1.6 but does not refer to a specific paragraph.

*Response: The typographical error has been corrected. The appropriate procedures have been added to this B6-2, checklist item no. 79, i.e., ZO-160-082 (all) and WMP-400, Section 7.1.4 (all).*

14. Item 81 cites procedure O-160-082. The cited procedure is not included with the report. Was procedure ZO-160-082 meant to be cited?

*Response: The typographical error has been corrected and the appropriate procedure (ZO-160-082) is now cited.*

15. Items 84, 89-92, 95, 96, 99-102, 105, 106, 108-114, 118-122, 130 and 132 cite procedure ZO-062-082. The cited procedure is not included with the report.

*Response: The typographical errors have been corrected and the appropriate procedure (ZO-160-082) and paragraphs are now cited.*

16. Items 128 and 129 cite procedure FSP-PFP-5-8, Volume 2, Section 4.3.4. The cited procedure does not seem to answer question 128 and only partially answers 129

*Response: The typographical errors in the references cited were corrected. The appropriate procedures include: WMP-400, Section 7.1.6 (all) and ZO-160-082 (all) for item 128, and ZO-160-082 for item 129.*

17. Item 164 cites procedure WMP-400, Section 7.11. The cited procedure is included with the report but not Section 7.11.

*Response: The typographical errors have been corrected. There is no procedure WMP-400, Section 7.11. The correct procedure and paragraphs are: WMP-400, Section 7.1.9, paragraphs 4.3, 4.6, and 4.7. WMP-400, Section 7.1.1, Paragraphs 4.2.2 through 4.2.8 contains information regarding solvent VOC testing data.*