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**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

July 6, 2004

R. Paul Detwiler, Acting Manager  
Carlsbad Field Office  
Department of Energy  
P.O. Box 3090  
Carlsbad, New Mexico 88221-3090

Dr. Steven Warren, President  
Washington TRU Solutions LLC  
P.O. Box 2078  
Carlsbad, New Mexico 88221-5608

**RE: NMED COMMENTS ON THE SAVANNAH RIVER SITE/ CENTRAL CHARACTERIZATION PROJECT FINAL AUDIT REPORT, AUDIT A-04-01 WASTE ISOLATION PILOT PLANT EPA I.D. NUMBER NM4890139088**

Dear Mr. Detwiler and Dr. Warren:

On December 1, 2003, the New Mexico Environment Department (NMED) received the Final Audit Report of the Savannah River Site (SRS)/ Central Characterization Project (CCP) Audit Number A-04-01 (Audit Report), from the Department of Energy's Carlsbad Field Office (CBFO). CBFO and Washington TRU Solutions LLC (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 annual recertification audit was to ensure the continued adequacy, implementation, and effectiveness of the SRS/CCP waste characterization processes for retrievably stored debris contact-handled waste relative to the requirements of the WIPP Permit. The final Audit Report consisted of the following items:

- A narrative report
- Completed copies of relevant Permit Attachment B6 checklists
- Final SRS/CCP standard operating procedures (hardcopy only)
- Corrective action reports and items corrected during the audit
- Objective evidence examined during the audit
  - General information
  - Acceptable knowledge

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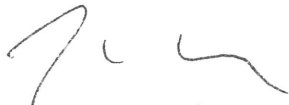
- Headspace gas
- Real time radiography
- Visual examination

NMED representatives observed the SRS/CCP audit on October 21 – 24, 2003. 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 [WAP]). The Audit Report indicates there were five deficiencies requiring only remedial actions that were corrected during the audit, and one recommendation identifying an opportunity for improvement. Attached are NMED's general comments based upon observation of the SRS/CCP audit and review of the Audit Report. These are provided to guide future audit report preparation and to assist the Permittees in understanding NMED's concerns.

NMED concludes that the Audit Report is incomplete in that it does not adequately address all elements examined during the audit. Because of this incompleteness, NMED is withholding approval of the Permittees' Final Audit Report for SRS/CCP Audit A-04-01 until the Permittees submit the additional information identified in the paragraph above and in the attached comments that demonstrate full implementation of all relevant permit requirements. Indicate revisions to any text in the Audit Report and checklists with redline/strikeout annotation.

If you have any questions regarding this matter, please contact me at (505) 428-2512.

Sincerely,



James P. Bearzi  
Chief  
Hazardous Waste Bureau

JPB:soz

Attachment

cc: Charles Lundstrom, NMED WWMD  
Steve Zappe, NMED HWB  
Tracy Hughes, NMED OGC  
R. Lewis Shaw, SC DHEC  
Laurie King, EPA Region 6  
Betsy Forinash, EPA ORIA  
Connie Walker, Trinity Engineering  
Don Hancock, SRIC  
Joni Arends, CCNS  
File: Red WIPP '04

**NMED COMMENTS ON THE**  
**SAVANNAH RIVER SITE/ CENTRAL CHARACTERIZATION PROJECT (SRS/CCP)**  
**FINAL AUDIT REPORT A-04-01**

NMED's review indicated that the Audit Report showed less attention to detail than presented in previous Audit Reports and, unless remedied, this less rigorous approach to preparation could result in significant deficiencies in future Audit Reports. The body of the Audit Report appears to generally address the applicable elements. However, there are some omissions, errors, and inconsistencies including but not limited to the following items:

1. Permit Attachment B5, Section B5-1, clearly requires sites to develop and implement site-specific quality assurance project plans (QAPjPs). NMED notes that the QAPjP for this SRS/CCP audit (CCP-PO-001) is apparently used by all sites where CCP has established a characterization program (e.g., NTS, ANL-E, Hanford, etc.). Please clarify how a generic QAPjP satisfies the requirements specified in Permit Attachment B5, recognizing that NMED does not view CCP as a "site" as the term is used in the permit.
2. From the B6 Checklist, pertaining to question 11, procedure CCP-PO-001, Section B-4 may not be the correct objective evidence. NMED believes that Section B-3 actually answers the question.
3. From the B6 Checklist, pertaining to question 12, procedure CCP-TP-001 Sec. B-1c does not exist. The reference to B-1c is perhaps to Section B-1c of the permit or in the QAPjP. Therefore, it is assumed that the intended reference in procedure CCP-TP-001 was a typographical error. Also, procedure CCP-TP-005 Section 4.4 is cited. While the referenced section is good, Attachment 6 should be listed as well to clarify.
4. From the B6 Checklist, pertaining to question 14, in procedure CCP-TP-002, there is not a Section A2 as referenced in the audit report.
5. From the B6 Checklist, pertaining to questions 15 and 16, in procedure CCP-TP-002, Section 4.5 does not refer to NMED.
6. From the B6 Checklist, pertaining to question 17, CCP-TP-056 is not included in the audit report.
7. From the B6 Checklist, pertaining to question 20, in procedure CCP-PO-001, B3a(1) doesn't exist in the procedure. This is a possible typographical error and should read B-3a(1).
8. From the B6 Checklist, pertaining to questions 32, 33, 34, 35, 37, 38, and 264, there is a reference to a procedure CCP-PO-011. There was no such procedure involved with the audit or included in the audit report. This may be a typographical error in that the procedure may be CCP-PO-001.

9. From the B6 Checklist, pertaining to question 68, the reference is listed as CCP-QP-008, Section 4.10.5.A where it should actually be CCP-QP-008, Section 4.10.5 [A].
10. From the B6 Checklist, pertaining to question 69, the reference is listed as CCP-QP-008, Section 4.10.5.B where it should actually be CCP-QP-008, Section 4.10.5 [B].
11. From the B6 Checklist, pertaining to question 148, the reference is CCP-TP-002, Section 4.2.1. This Section 4.2.1 does not seem to answer the question.
12. From the B6 Checklist, pertaining to question 164, the reference is CCP-TP-005, Section 4.2. This Section 4.2 does not seem to answer the question.
13. From the B6 Checklist, pertaining to questions 170, 171, 172, 173, 174, 175, 176 and 177, the references are CCP-QP-018, CCP-QP-019, CCP-QP-020 and CCP-QP-021. None of the procedures are included with the report.
14. From the B6 Checklist, pertaining to question 192, lists A - H. F has been left out. Is this a typo?
15. From the B6 Checklist, pertaining to question 199, the reference is CCP-TP-029 Attachments 1, 2, 4, 6 and 10. The Attachments referenced do not exist.
16. From the B6 Checklist, pertaining to questions 201 and 202, the reference is given as CCP-007. There is no such procedure as CCP-007.
17. From the B6 Checklist, pertaining to question 208, the justification for not answering the question was "The requirement is not in the final permit." However, the requirement in Section B1-4 that "All samples will be uniquely identified to ensure the integrity of the sample and can be used to identify the generator/storage site and date of collection" was not answered and it is still in the final permit. Even though the checklist contains a typographical error, the Permit requirement takes precedence over the checklist and must still be answered.
18. From the B6 Checklist, pertaining to questions 236, 237, 241, 244, 245, 246, 265, 266 and 275, the reference is CCP-TP-045. The referenced procedure is not included with the report.
19. From the B6 Checklist, pertaining to question 238, the reference is CCP-PO-001 Section B1-3a. NMED believes that Section B1-3b answers the question instead.
20. From the B6 Checklist, pertaining to question 243, the reference is CCP-TP-011, Section 1.0. Shouldn't Section 1.1 be added for clarification? Also, CCP-PO-001, Section B-3c is referenced. NMED believes that CCP-PO-001, Section B1-3a should be referenced instead.

21. In procedure CCP-TP-007, Section 4.1.3, the statement reads “The drum age criteria as specified in step?”. What is “step”?