



Department of Energy

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

AUG 07 2008

Mr. James Bearzi, Chief
Hazardous Waste Bureau
New Mexico Environment Department
2905 E. Rodeo Park Dr. Bldg. 1
Santa Fe, New Mexico 87505-6303



Subject: Response to Observer Inquiry from Audit A-08-12

Dear Mr. Bearzi:

We believe that audit A-08-12 of the ORNL/CCP RH waste characterization program held June 30 to July 3, 2008 was in compliance with the Hazardous Waste Facility Permit for WIPP. The Permit requires that an AK traceability analysis be performed during audits on the Summary Category Groups being audited (Ref: Permit Attachment B4-3g). From the time the Permit was first approved, such an analysis has been performed for initial audits of generator/storage sites and during annual recertification audits. Because the Summary Category Group of Debris (S5000) was audited during audit A-08-04 of the ORNL/CCP CH waste characterization program, and the required AK traceability analysis for S5000 waste was performed, there was no Permit requirement to perform a full AK traceability analysis again to gain approval of visual examination of remote-handled waste during audit A-08-12. CBFO did take the opportunity during audit A-08-12 to review the AK process that had been applied to OR-REDC-RH-HET.

With regard to adding a requirement to perform separate AK traceability analyses for RH and CH Summary Category Groups during the Permit renewal process, we believe this is unwarranted. There is no difference in the characterization requirements for RH waste and CH waste with the exception that visual examination or radiography of 100% of RH containers is required. The only difference between RH and CH TRU waste is the amount of radioactivity and there is no difference with the hazardous waste component of the waste stream. The process for lot evaluation, EPA Hazardous Waste Number assignment, Waste Stream Profile Form approval, and Characterization Information Summary preparation is identical for RH and CH waste.

If you have any questions, please call J. R. Stroble from the Office of the National TRU Program at 575-234-7313.

Sincerely,

David C. Moody
Manager

