



Department of Energy  
Carlsbad Field Office  
P. O. Box 3090  
Carlsbad, New Mexico 88221  
October 2, 2008



Mr. James Bearzi  
Hazardous Waste Bureau  
New Mexico Environment Department  
2905 Rodeo Park Drive East, Building 1  
Santa Fe, New Mexico 87505-6303



Dear Mr. Bearzi:

On February 25, 2008, the New Mexico Environment Department (NMED) submitted to the U.S. Department of Energy, Carlsbad Field Office (CBFO) approval of the Final Audit Report for the Savannah River Site/Central Characterization Project (SRS/CCP) Audit Number A-08-01. In the letter, NMED raised additional concerns regarding CBFO's responses to two of three observer inquiries. Regarding CBFO's response to Observer Inquiry 08-002, NMED expressed a concern that CCP-TP-113 appears to grant the Visual Examination Expert (VEE) more discretion than is currently allowed under the permit and that the VEE signature on Attachment 4 of the Batch Data Report (BDR) fails to denote responsibility for any "VEE decisions" documented elsewhere in the BDR. NMED then recommended that CCP revise CCP-TP-113 to ensure the VEE responsibilities are entirely consistent with the Permit and that the significance of a VEE certification related to the review of a BDR be apparent at the point of signature.

Since the date of those responses, both CCP-TP-113 and the Visual Examination (VE) process has changed based on additional input from NMED for other reasons. Changes to the CCP VE process have taken away the ability of the VE expert to determine that a limited VE is appropriate. The verbiage that allowed this limited visual examination has been deleted from the *Transuranic Waste Acceptance Criteria for the Waste Isolation Pilot Plan* (DOE/WIPP 02-3122), Appendix G.

CCP-TP-113, Paragraph 3.2.3 provides the following as a responsibility of the VE expert: "Determines the extent of VE and waste segregation based upon the available Acceptable Knowledge (AK) data to achieve program objectives." This allowance provides the person responsible for visual examination, the VE expert, the ability to direct the implementation of the visual examination process and make decisions to allow such actions as minimizing the handling of specific items to prevent worker injury and minimize radiation exposure while meeting all applicable requirements of the permit.

With respect to the delineation of the significance of a VEE certification related to the review of a BDR be apparent at the point of signature, CBFO does not feel that additional verbiage at the point of signature is warranted because the applicable



CCP-TP-113, Step 4.7.1 currently states that the signature on Attachment 5 (previously Attachment 4) of the BDR is "to annotate that the proper VE determination was made, and VEE decisions are documented." In Observer Inquiry 08-003, NMED requested copies of the Savannah River Site/Site Technical Representative's (SRS/STR) comments on the AK-SRS-8 Summary for waste stream SR-MD-SOIL, correspondence documenting the final disposition of the SRS comments, and the final concurrence with assignment of Hazardous Waste Numbers (HWNs) to the above waste stream. Enclosure 1 contains copies of information requested. However the enclosure does not specifically address HWNs as the SRS STR had no comments on HWNs.

We believe that these inquiries have been addressed, and if you have any questions, please contact Donald C. Gadbury at (575) 234-7372.

Sincerely,



David C. Moody  
Manager

Enclosure

cc: w/enclosure  
S. Holmes, NMED HWB  
Site Documents  
CBFO M&RC

cc: w/o enclosure  
C. Gadbury, CBFO           \*ED  
C. Fesmire, CBFO           ED  
N. Castaneda, CBFO       ED  
D. Miehl, CBFO            ED  
M. Navarrete, CBFO       ED  
F. Sharif, WTS             ED  
D.K. Ploetz, WTS          ED  
M. Percy, WTS             ED  
C. Simmons, WTS          ED  
C. Riggs, CTAC            ED  
\*ED denotes electronic distribution

SRS STR Comments for CCP-AK-SRS-8 Which Includes Waste Stream SR-MD-SOIL, Revision 0

Note From Approver

✓  
From: lee.fox@srs.gov [mailto:lee.fox@srs.gov]  
Sent: Wednesday, December 29, 2004 6:37 AM  
To: Ashford, Angela - L&M  
Subject: Re: FW: SRS-8 Comments

Please re-issue the cover page without the "classification stamp". This must be obtained again after all revisions have been incorporated.

Otherwise I have no comments.

Lee Fox  
SRS / CCP Interface STR  
803-208-0778 / Pager 803-725-7243; ID #15457

Close

SRS STR Approval for CCP-AK-SRS-8 8 Which Includes Waste Stream SR-MD-SOIL, Revision 0

QRMTS 4.61 - For WIPP - As of 7/27/2002

QMIS Edit Document Review Request Traceability Utility Help

Document Entry

Document Number: CCP-AK-SRS-8  
Revision: 0

Document Status: OBSOLETE  
Document Type: CCP

1.General 2.Property 3.Note 4.Checklist 5.Approval 6.X\_Ref 7.Distribution 8.Review 9.History

Level	Employee No.	Job Code	Notify Only	Final Approval
1	BICKERS	000000000	<input checked="" type="checkbox"/>	<input type="checkbox"/>
1	CANTUA	01591	<input type="checkbox"/>	<input checked="" type="checkbox"/>
1	DAMELIJ	00671	<input checked="" type="checkbox"/>	<input type="checkbox"/>
1	HARRISJ	00671	<input checked="" type="checkbox"/>	<input type="checkbox"/>
1	MCTAGGJ	00671	<input checked="" type="checkbox"/>	<input type="checkbox"/>
1	WALKERR	01070	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2	FOXJ	00671	<input type="checkbox"/>	<input checked="" type="checkbox"/>
2	REEVESR	01180	<input type="checkbox"/>	<input checked="" type="checkbox"/>
3	FISHERA	00671	<input type="checkbox"/>	<input checked="" type="checkbox"/>
3	ROSES	00671	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Approval Process  
ISSUED  
 Stop On 1st Reject  Route Subdocument

Approval Status  
APPROVED  Conditional Approval  
By ANGELA ASHFORD  
On 12/29/04 12:21:10

Note  
To Approver: SRS STR  
From Approver: From: lee.fox@srs.gov (mailto:lee.fox@srs.gov) Sent: Wednesday, December 29, 2004 8:37 AM

LEE FOX  
Add Group Add Delete Cancel Alternate Rules Close

Warning - Modify operation canceled due to task Query mode ASNFORA Query WIDE IMS

SRS STR Comments for CCP-AK-SRS-8 8 Which Includes Waste Stream SR-MD-SOIL, Revision 1

From: joseph.damelio@srs.gov [mailto:joseph.damelio@srs.gov]  
Sent: Tuesday, July 12, 2005 9:10 AM  
To: Angela.Ashford@wipp.ws  
Cc: debra.lambert@srs.gov; lee.fox@srs.gov  
Subject: CCP-AK-SRS-8, Rev 1 Draft A

SRS has reviewed SRS-8 Rev 1 Draft A and has the following comment:

Please revise Section 2.2, to specify that the 55 gallon drums have 0 layers of confinement, the other steel boxes have 3 layers of confinement and identify how many layers of confinement are in the SWB.

[attachment "CCP-AK-SRS-8-Rev1-DraftB071205.pdf" deleted by Lee Fox/WSRC/Srs]

-----Original Message-----

From: Ashford, Angela - L&M [mailto:Angela.Ashford@wipp.ws]  
Sent: Tuesday, July 12, 2005 8:55 AM  
To: Harrison, Jeff  
Cc: Cantu, Adela  
Subject: FW: CCP-AK-SRS-8, Rev 1 Draft A  
Importance: High

Good morning.

Please see below comments from SRS. Let me know your resolutions.

Thanks,

Angie

SRS STR Comments for CCP-AK-SRS-8 8 Which Includes Waste Stream SR-MD-SOIL, Revision 1

-----Original Message-----

From: Jeff Harrison [mailto:Trash\_Talk@msn.com]  
Sent: Tuesday, July 12, 2005 9:46 AM  
To: 'Ashford, Angela - L&M'  
Cc: 'Cantu, Adela'  
Subject: RE: CCP-AK-SRS-8, Rev 1 Draft A

Angie,

In resolving his comment, I also discovered something else that needs to be changed. Please make the following changes based on Joe's comment:

Section 2.2, Layers of Confinement: Change "None" to "None (55-gallon drums)" Underneath add "None (standard waste box)" Underneath that add "Three (large metal boxes)" [Angie, this should look similar to Section 2.1]

Section 6.5.2, 1st paragraph: Change "According to the TWCC forms, containers in this waste stream." to read "According to the TWCC forms, the large metal boxes in this waste stream."

Jeff Harrison  
720-977-7042 (work)

"Ashford, Angela - L&M" <Angela.Ashford@wipp.ws>

07/12/2005 12:22 PM

To "Joseph D'Amelio (joseph.damello@srs.gov)" <joseph.damello@srs.gov>

cc "Debra.Lambert@srs.gov" <Debra.Lambert@srs.gov>, "Lee Fox (Lee.Fox@srs.gov)" <lee.fox@srs.gov>, "Cantu, Adela"

<Adela.Cantu@wipp.ws>, "Harrison, Jeff" <Trash\_Talk@msn.com>

Subject FW: CCP-AK-SRS-8, Rev 1 Draft A

Attached is Draft B of CCP-AK-SRS-8, Revision 1. Your comments have been addressed by Jeff Harrison (see below) and incorporated into Draft B. Please provide additional comments/final approval via email ASAP. I need the final approval from Debbie Lambert since she is assigned to review/approve in Lee Fox's absence.

Thanks,  
Angie

SRS STR Comments for CCP-AK-SRS-8 8 Which Includes Waste Stream SR-MD-SOIL, Revision 1

**From:** lee.fox@srs.gov  
**Sent:** Monday, July 18, 2005 8:30 AM  
**To:** Ashford, Angela - L&M  
**Subject:** Re: FW: CCP-AK-SRS-8, Rev 1 Draft A

I did not see an approval from Debbie. Just to cover the bases, I have no comments on the referenced AK report.

Lee Fox  
SRS / CCP Interface STR  
803-208-0778 / Pager 803-725-7243; ID #15457

SRS STR Approval for CCP-AK-SRS-8 8 Which Includes Waste Stream SR-MD-SOIL, Revision 1

Q&MIS 4.61 - For WIPP - As Of 7/27/2002

Q&MIS Edit Document Review Request Traceability Utility Help

**Document Entry**

Document Number: CCP-AK-SRS-8      Document Status: CURRENT  
Revision: 1      Document Type: CCP

1.General   2.Property   3.Note   4.Checklist   5.Approval   6.X\_Ref   7.Distribution   8.Review   9.History

Level	Employee No.	Job Code	Notify Only	Fixed Approval
1	BICKERS	000000000	<input checked="" type="checkbox"/>	<input type="checkbox"/>
1	CANTUA	01581	<input type="checkbox"/>	<input checked="" type="checkbox"/>
1	DAMELW	00671	<input checked="" type="checkbox"/>	<input type="checkbox"/>
1	HARRISJ	00671	<input checked="" type="checkbox"/>	<input type="checkbox"/>
1	MCTAGGJ	00671	<input checked="" type="checkbox"/>	<input type="checkbox"/>
1	WALKERR	01070	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2	FOXJ	00671	<input type="checkbox"/>	<input checked="" type="checkbox"/>
2	REEVESR	01100	<input checked="" type="checkbox"/>	<input type="checkbox"/>
3	FISHERA	00671	<input type="checkbox"/>	<input checked="" type="checkbox"/>
3	PORTERL	00671	<input type="checkbox"/>	<input checked="" type="checkbox"/>

LEE FOX

Add Group   Add   Delete   Cancel   Alternate   Rules   Close

**Approval Process**  
ISSUED  
 Stop On 1st Reject    Route Subdocument

**Approval Status**  
APPROVED    Conditional Approval  
By: ANGELA ASHFORD  
On: 07/12/05 12:07:38

**Note**  
To Approver:      From Approver:  
Approved by Debra Lambert (see notes for delegation email).  
From:

Runtime: Document Control      ASHFORD      Query      WIDE      OVR

**Note From Approver**

Approved by Debra Lambert (see notes for delegation email).

From: debra.lambert@srs.gov [mailto:debra.lambert@srs.gov]  
Sent: Tuesday, July 12, 2005 11:18 AM  
To: Ashford, Angela - L&M  
Subject: Re: FW: CCP-AK-SRS-8, Rev 1 Draft A

This is notification of approval of CCP-AK-SRS-8, Revision 1. Please let me know if further actions are needed

Debbie Lambert  
803-208-3256

Close



SRS STR Comments for CCP-AK-SRS-8 8 Which Includes Waste Stream SR-MD-SOIL, Revision 2

Runtime: Document Control

ILYSHIKG Query WIDE INS

start [Icons] 2:17 PM

Note From Approver

From: lee.fox@srs.gov [mailto:lee.fox@srs.gov]  
Sent: Wednesday, September 14, 2005 12:36 PM  
To: Parks, Terese - L&M  
Subject: Re: CCP-AK-SRS-8

SRS has no comments on the referenced AK.

Lee Fox  
SRS / CCP interface STR  
803-208-0778 / Pager 803-726-7243; ID #15457

Close

start [Icons] 2:17 PM

SRS STR Approval for CCP-AK-SRS-8 8 Which Includes Waste Stream SR-MD-SOIL, Revision 2

Q&MIS-1.61 For WIPP As Of 7/27/2002

Q&MIS Edit Document Review Request Traceability Query Help

Document Entry

Document Number: CCP-AK-SRS-8  
Revision: 2

Document Status: CURRENT  
Document Type: CCP

1.General 2.Property 3.Note 4.Checklist 5.Approval 6.X\_Ref 7.Distribution 8.Review 9.History

Level	Employee No.	Job Code	Notify Only	Fixed Approval
1	CANTUA	01581	<input type="checkbox"/>	<input checked="" type="checkbox"/>
1	DAMELU	00671	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
1	HARRISJ	00671	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
1	MCTAGGJ	00671	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
1	WALKERR	01070	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
2	FDXL	00671	<input type="checkbox"/>	<input checked="" type="checkbox"/>
2	REEVESR	01100	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
3	FISHERA	00671	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
3	ROSES	00671	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
4	HAARD	00671	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

Approval Process  
ISSUED

Stop On 1st Reject  Route Subdocument

Approval Status  
APPROVED  Conditional Approval

By THERESA PARKS  
On 09/14/05 12:49:49

Note  
To Approver From Approver  
TR From: lee.fox@srs.gov  
(mailto:lee.fox@srs.gov)  
Sent: Wednesday, September 14, 2005  
12:36 PM

LEE FOX

Add Items Add Delete Cancel Alternate Rules Close

SRS STR Comments for CCP-AK-SRS-8 8 Which Includes Waste Stream SR-MD-SOIL, Revision 3

Table From Approver

✓  
From: lee.fox@srs.gov [mailto:lee.fox@srs.gov]  
Sent Monday, November 28, 2005 8:46 AM  
To: Ashford, Angela - Triumph Tech  
Cc: Lyshik, Gwen - Triumph Tech  
Subject: Re: CCP-AK-SRS-8, Revision 3, Draft B

I have no comments on the referenced AK report.

Lee Fox  
SRS / CCP Interface STR  
803-208-0778 / Pager 803-725-7243; ID #15457

\*Ashford, Angela - Triumph Tech\* <Angela.Ashford@wipp.ws>  
11/23/2005 10:06 AM To "Lee.Fox@srs.gov" <lee.fox@srs.gov>  
cc "Lyshik, Gwen - Triumph Tech" <Gwen.Lyshik@wipp.ws>  
Subject CCP-AK-SRS-8, Revision 3, Draft B

Hi Lee,

The attached AK report is in response to a corrective action. Please review ASAP and return comments/approval via email

Thanks,  
Angie Ashford  
CCP Document Services  
(505) 234-7282

[attachment "CCP-AK-SRS-8-Rev3-DraftB.pdf" deleted by Lee.Fox@WSRC/Srs]

Clear

SRS STR Approval for CCP-AK-SRS-8 8 Which Includes Waste Stream SR-MD-SOIL, Revision 3

Q&MIS Edt Document Review Request Traceability Utility Help

Document Number: CCP-AK-SRS-8 Document Status: CURRENT  
Revision: 3 Document Type: SCP

1.General 2.Property 3.Note 4.Checklist 5.Approval 6.X\_Ref 7.Distribution 8.Review 9.History

Level	Employee No.	Job Code	Notify Only	Fixed Approval
1	BECKERC	00671	<input checked="" type="checkbox"/>	<input type="checkbox"/>
1	BICKERS	00671	<input checked="" type="checkbox"/>	<input type="checkbox"/>
1	DAMELW	00671	<input checked="" type="checkbox"/>	<input type="checkbox"/>
1	MCTAGGJ	00671	<input checked="" type="checkbox"/>	<input type="checkbox"/>
1	SIMMONC	00671	<input checked="" type="checkbox"/>	<input type="checkbox"/>
1	WALKERR	01070	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2	FOX L	00671	<input type="checkbox"/>	<input checked="" type="checkbox"/>
2	REEVESR	01100	<input checked="" type="checkbox"/>	<input type="checkbox"/>
3	FISHERA	00671	<input checked="" type="checkbox"/>	<input type="checkbox"/>
3	ROSES	00671	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Approval Process: ISSUED  
 Stop On 1st Reject  Route Subdocument

Approval Status: APPROVED  
 By GWENLYSHIK  
 On 11/28/05 08:47:53

Note  
 To Approver: From Approver:  
 TR From: lee.fox@srs.gov  
 (mailto:lee.fox@srs.gov)  
 Sent: Monday, November 28, 2005 8:45 AM

LEE FOX

Auto Save | Print | Delete | Cancel | Alternate | Rules | Close

Runtime: Document Control NELSONKR Query INS

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SRS STR Comments for CCP-AK-SRS-8 8 Which Includes Waste Stream SR-MD-SOIL, Revision 4

Note from Approver

✓

From: lee.fox@srs.gov [mailto:lee.fox@srs.gov]  
Sent: Wednesday, August 29, 2007 2:00 PM  
To: Lyshik, Gwen - Triumph  
Subject: Re: CCP-AK-SRS-8, REVISION 4, DRAFT D

I have no comment on the referenced AK report.

Lee Fox  
SRS / CCP Interface STR  
803-208-0776 / Pager 803-725-7243, ID #15457

"Lyshik, Gwen - Triumph" <Gwen.Lyshik@wppa.wa.gov>  
9/5/2007 03:46 PM To: "Lee Fox@srs.gov" <lee.fox@srs.gov>  
cc:  
Subject: CCP-AK-SRS-8, REVISION 4, DRAFT D

Attached is CCP-AK-SRS-8, Revision 4, Draft D for your review. Please provide comments/approval via email.

Thanks,  
Gwen Lyshik  
(509)234-7203  
CCP Document Services  
[attachment "CCP-AK-SRS-8-REV4-DRAFTD.pdf" deleted by Lee Fox/WSRCSrs]

Close

SRS STR Approval for CCP-AK-SRS-8 8 Which Includes Waste Stream SR-MD-SOIL, Revision 4

QRMIS 4.01 for SRS - Rev 01/11/2007  
 QRMIS Edit Document Review Request Traceability Utility Help

Document Entry

Document Number: CCP-AK-SRS-8      Document Status: CURRENT  
 Revision: 4      Document Type: CCP

1 General	2 Property	3 Note	4 Checklist	5 Approval	6 X Ref	7 Distribution	8 Review	9 History																																																							
<table border="1"> <thead> <tr> <th>Level</th> <th>Employee No.</th> <th>Job Code</th> <th>Notify Date</th> <th>Final Approval</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>CANNONV</td> <td>00671</td> <td><input checked="" type="checkbox"/></td> <td><input checked="" type="checkbox"/></td> </tr> <tr> <td>1</td> <td>CANTUA</td> <td>01581</td> <td><input checked="" type="checkbox"/></td> <td><input checked="" type="checkbox"/></td> </tr> <tr> <td>1</td> <td>LUKSFQJE</td> <td>00671</td> <td><input checked="" type="checkbox"/></td> <td><input checked="" type="checkbox"/></td> </tr> <tr> <td>1</td> <td>MCTAGG</td> <td>00671</td> <td><input checked="" type="checkbox"/></td> <td><input checked="" type="checkbox"/></td> </tr> <tr> <td>2</td> <td>FDCL</td> <td>00671</td> <td><input checked="" type="checkbox"/></td> <td><input checked="" type="checkbox"/></td> </tr> <tr> <td>3</td> <td>CANNONV</td> <td>00671</td> <td><input checked="" type="checkbox"/></td> <td><input checked="" type="checkbox"/></td> </tr> <tr> <td>3</td> <td>ROSES</td> <td>00671</td> <td><input checked="" type="checkbox"/></td> <td><input checked="" type="checkbox"/></td> </tr> <tr> <td>4</td> <td>ATWOODA</td> <td>00671</td> <td><input checked="" type="checkbox"/></td> <td><input checked="" type="checkbox"/></td> </tr> <tr> <td>4</td> <td>PEARCYM</td> <td>00671</td> <td><input checked="" type="checkbox"/></td> <td><input checked="" type="checkbox"/></td> </tr> <tr> <td>4</td> <td>WALKERP</td> <td>01070</td> <td><input checked="" type="checkbox"/></td> <td><input checked="" type="checkbox"/></td> </tr> </tbody> </table>					Level	Employee No.	Job Code	Notify Date	Final Approval	1	CANNONV	00671	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	1	CANTUA	01581	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	1	LUKSFQJE	00671	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	1	MCTAGG	00671	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	2	FDCL	00671	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	3	CANNONV	00671	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	3	ROSES	00671	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	4	ATWOODA	00671	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	4	PEARCYM	00671	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	4	WALKERP	01070	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<p>Approval Process:</p> <p>ISSUED</p> <p><input checked="" type="checkbox"/> Stop On 1st Reject      <input type="checkbox"/> Route Subdocument</p> <p>Approval Status:</p> <p>APPROVED      <input type="checkbox"/> Conditional Approval</p> <p>By: GWENLYSHIK        On: 08/29/07 14:04:41</p> <p>Note:</p> <p>To: Approver      From Approver</p> <p>From: lee.fox@srs.gov        (mailto:lee.fox@srs.gov)        Sarc: Wkstn0016        August 28, 2007 2:00 PM</p>			
Level	Employee No.	Job Code	Notify Date	Final Approval																																																											
1	CANNONV	00671	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>																																																											
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LEE FOX

Cancel      Alternate      Help      Close

Runtime: Document Control      LYSHIK      Gump      WIDE      RES