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

MAY 5 2011

MAY 2011

Mr. John Kieling, Acting Bureau Chief  
Hazardous Materials Bureau  
New Mexico Environment Department  
2905 Rodeo Park Drive East, Building 1  
Santa Fe, New Mexico 87505-6303

Subject: Transmittal of Audit Plan and Notification of Assigned Auditors for CBFO Audit A-11-14 of the INL/CCP

Dear Mr. Kieling:

This letter transmits the audit plan for Carlsbad Field Office (CBFO) Recertification Audit A-11-14 of the Idaho National Laboratory Central Characterization Project (INL/CCP). The audit will be conducted as required by the Waste Isolation Pilot Plant Hazardous Waste Facility Permit, and will be held at the INL/CCP facilities near Idaho Falls, Idaho on June 7-9, 2011. The audit plan identifies the audit team members as required by the Permit.

If you have any questions concerning this notification, please contact Martin P. Navarrete, Acting Director, Office of Quality Assurance, at (575) 234-7483.

Sincerely,

Edward Ziemianski  
Acting Manager

Enclosure

- cc: w/enclosure
- O. Vincent, CBFO \* ED
- M. Navarrete, CBFO ED
- D. Miehl, CBFO ED
- G. Basabilvazo, CBFO ED
- J. R. Stroble, CBFO ED
- H. Budweg, CBFO ED
- N. Castaneda, CBFO ED
- S. McCauslin, CBFO ED
- S. Holmes, NMED ED
- T. Bowden, CTAC ED
- K. D. Martin, CTAC ED
- WIPP Operating Record ED
- CBFO QA File
- CBFO M&RC

\*ED denotes electronic distribution



## CARLSBAD FIELD OFFICE AUDIT PLAN

**Audit Number:** A-11-14

**Organization to be Audited:** Idaho National Laboratory  
Central Characterization Project (INL/CCP)

**Organizations to be Notified:** U.S. Department of Energy – Idaho Falls (DOE-ID)  
U.S. Environmental Protection Agency (EPA)  
Washington TRU Solutions, LLC (WTS)  
New Mexico Environment Department (NMED)  
Defense Nuclear Facilities Safety Board (DNFSB)

**Date and Location:** June 7 – 9, 2011  
Idaho Falls, Idaho  
Carlsbad, New Mexico

**Audit Team:**

Tamara Bowden	Audit Team Leader, Carlsbad Field Office Technical Assistance Contractor (CTAC)
Dennis S. Miehls	Carlsbad Field Office (CBFO), Management Representative
Randall Allen	Auditor/Audits & Assessments Manager, CTAC
Katie Martin	Auditor, CTAC (VE)
Cindi Castillo	Auditor, CTAC (HSG, GGT, Flam Gas)
Greg Knox	Auditor, CTAC (RTR)
Rick Castillo	Auditor, CTAC (NDA & DTC)
Norm Frank**	Auditor, CTAC (AK)
Tommy Putnam	Auditor, CTAC (Transportation)
Jack Walsh**	Auditor, CTAC (C6 QA)
Porf Martinez	Technical Specialist/Auditor, CTAC (RTR)
Paul Gomez	Technical Specialist, CTAC (PL V&V)
Charleen Roberts**	Technical Specialist, CTAC (AK)
Rhett Bradford	Technical Specialist, CTAC (VE)
B.J. Verret	Technical Specialist, CTAC (HSG, GGT, Flam Gas)
Dick Blauvelt**	Technical Specialist, CTAC (AK)
Jim Oliver	Technical Specialist, CTAC (NDA & DTC)
Joe Willis	Technical Specialist, WTS (Transportation)
Steve McGonagill	Technical Specialist, WTS (Transportation)

\*\* Identifies personnel auditing in Carlsbad, NM

## **Audit Scope:**

The audit team will evaluate the continued adequacy, implementation, and effectiveness of INL/CCP transuranic (TRU) waste activities as they relate to the Waste Isolation Pilot Plant (WIPP) Hazardous Waste Facility Permit (HWFP) for characterization and certification of contact-handled (CH) Summary Category Group (SCG) S3000 homogeneous solids, S4000 soils/gravel, S5000 debris, and remote-handled (RH) S3000 homogeneous solids and S5000 debris waste.

The scope includes evaluation of validation and verification (V&V) of data resulting from headspace gas (HSG) samples and soils/gravel samples collected by INL/CCP and solid samples collected by the Advanced Mixed Waste Treatment Project (AMWTP) and analyzed by the INL/CCP laboratories. The specific items to be audited are listed under Activities to be Audited.

## **Activities to be Audited:**

### **General**

- Results of previous audits
- Changes in programs or operations
- New programs or activities being implemented
- Changes in key personnel

### **C6-1 and C6-3-related quality assurance (QA) activities in Carlsbad, NM**

- Personnel Qualification and Training
- Records
- Quality Improvement/Nonconformances
- WIPP Waste Information System (WWIS)/Waste Data System (WDS)

The following technical elements will be evaluated for compliance with the HWFP, utilizing the checklists in Attachment C6:

### **Carlsbad, NM**

- Project-Level Data Validation and Verification
- Acceptable Knowledge (AK)
- Waste certification (e.g., Waste Stream Profile Form)

### **INL (Idaho Falls)**

- Real-time radiography (RTR)
- Visual examination (VE)
- Headspace gas (HSG) sampling
- Solids sampling of soils/gravels

- Sample control
- Nondestructive assay (NDA)
- Dose-to-Curie (DTC)
- Flammable gas analysis
- Container Management
- Transportation

See the attachment, Process and Equipment to be Reviewed During Audit A-11-14 of INL/CCP, for additional details.

### **Governing Documents/Requirements:**

Adequacy of INL/CCP documents will be based on the current revisions of the following documents:

NM4890139088-TSDF, Waste Isolation Pilot Plant Hazardous Waste Facility Permit

DOE/CBFO-94-1012, *Quality Assurance Program Document (QAPD)*

DOEWIPP-02-3214, *Remote-Handled TRU Waste Characterization Program Implementation Plan (WCPIP)*

DOEWIPP-02-3122, *Transuranic Waste Acceptance Criteria for the Waste Isolation Pilot Plant (WAC)*

TRUPACT-II Safety Analysis Report: *TRUPACT-II Authorized Methods for Payload Control (TRAMPAC)*, and the TRUPACT-II Certification of Compliance NRC 71-9281

RH-TRU 72B Safety Analysis Report: *Remote-Handled Transuranic Waste Authorized Methods for Payload Control (RH-TRAMPAC)*, and the RH-TRU 72-B Certification of Compliance 71-9212

Programmatic and technical checklists will be developed from the active revisions of the following documents:

CCP-PO-001, *CCP Transuranic Waste Characterization Quality Assurance Project Plan (QAPjP)*

CCP-PO-002, *CCP Transuranic Waste Certification Plan*

CCP-PO-003, *CCP Transuranic Authorized Methods for Payload Control (CCP CH-TRAMPAC)*

CCP-PO-505, *CCP Remote-Handled Transuranic Waste Authorized Methods*

*for Payload Control (CCP RH-TRAMPAC)*

*CCP-PO-024, CCP/INL Interface Document*

*CCP-PO-501, CCP/INL RH TRU Waste Interface Document*

Related INL/CCP and WTS CCP QA and technical implementing procedures

**Schedule of Audit Activities:**

A pre-audit conference will be held Tuesday, June 7, 2011, at 8:00 a.m.

Audit team caucus meetings will be held Tuesday and Wednesday, June 7 – 8, 2011, at 4:00 p.m.

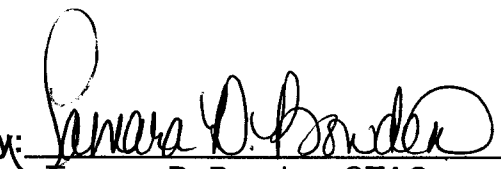
An audit team caucus meeting will be held Thursday, June 9, 2011, at 2:00 p.m.

Daily management briefing will be held Wednesday and Thursday, June 8 – 9, 2011, at 8:30 a.m.

A post-audit conference is scheduled for Thursday, June 9, 2011, at 4:00 p.m.

All meetings will take place at the designated INL and CBFO locations.

Prepared by:

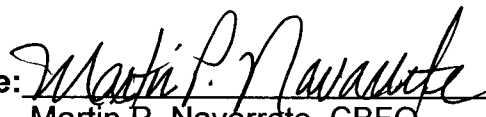


Tamara D. Bowden, CTAC  
Audit Team Leader

Date:

5/3/11

Concurrence:



Martin P. Navarrete, CBFO  
Acting Quality Assurance Director

Date:

5-4-11

## Processes and Equipment to be Reviewed During Audit A-11-14 of the INL/CCP

WIPP #	Process/Equipment Description	Applicable to the Following Waste Streams/Groups of Waste Streams	Currently Approved by NMED	Currently Approved by EPA
<b>NEW PROCESSES OR EQUIPMENT</b>				
	NONE			
<b>PREVIOUSLY APPROVED PROCESSES OR EQUIPMENT</b>				
TBD	Visual Examination Procedure – CCP-TP-113 and CCP-TP-163 Description – Visual Examination	Debris (S5000)	YES	YES
14VE1	Visual Examination (VE) Procedure – CCP-TP-006 Description – Visual Examination Technique (VET)	Solids (S3000) Soils (S4000) Debris (S5000)	YES	YES
14RHVE1	Visual Examination Procedure – CCP-TP-500 Description - The VE of audio/video media process used for a total of 70 retrievably stored remote-handled (RH) debris waste drums	Solids (S3000) Soils (S4000) Debris (S5000)	YES	YES
14RR2	Nondestructive Examination Procedure – CCP-TP-053 Equipment – MCS RTR-5 Description – MCS Real-time Radiography (RTR) Mobile Characterization (RTR-5) System	Solids (S3000) Debris (S5000)	YES	YES
14RRH1	Nondestructive Examination Procedure – CCP-TP-508 Equipment – RTR-RTR-0659 Description – VJ Technologies, Real-time Radiography Characterization (RTR-RTR-0659) System	Debris (S5000)	YES	YES
14GG1	Gas Generation Testing Procedure – CCP-TP-083 Equipment – MGSS Unit/Cart 1 (GC-14B) Description – Gas Generation Testing 55-gallon drums	Waste Type IV	N/A	N/A
14GG2	Gas Generation Testing Procedure – CCP-TP-083 Equipment – MGSS Unit/Cart 2 (GC-17A) Description – Gas Generation Testing 55-gallon drums	Waste Type IV	N/A	N/A

## Processes and Equipment to be Reviewed During Audit A-11-14 of the INL/CCP

WIPP #	Process/Equipment Description	Applicable to the Following Waste Streams/Groups of Waste Streams	Currently Approved by NMED	Currently Approved by EPA
N/A	Acceptable Knowledge	Solids (S3000) Soils (S4000) Debris (S5000)	YES	YES
N/A	Solids/Soils and Gravel Sampling and Custody	Solids (S3000) Soils (S4000)	YES	N/A
N/A	Solids/Soils and Gravel Sampling and Custody for RH	Solids (S3000)	YES	N/A
N/A	SUMMA <sup>®</sup> Headspace Gas (HSG) Sampling and Custody	Debris (S5000)	YES	N/A
N/A	Data Validation and Verification	Solids (S3000) Soils (S4000) Debris (S5000)	YES	YES
N/A	WIPP Waste Information System (WWIS)	Solids (S3000) Soils (S4000) Debris (S5000)	YES	YES
14SHC1	Nondestructive Assay Procedure – CCP-TP-146 Description – CCP Super High Efficiency Neutron Counter	Solids (S3000) Debris (S5000)	N/A	YES
14HENC1	Nondestructive Assay Procedure – CCP-TP-107 Description – CCP High Efficiency Neutron Counter	Solids (S3000) Soils (S4000) Debris (S5000)	N/A	YES

## Processes and Equipment to be Reviewed During Audit A-11-14 of the INL/CCP

WIPP #	Process/Equipment Description	Applicable to the Following Waste Streams/Groups of Waste Streams	Currently Approved by NMED	Currently Approved by EPA
14SGRS1	Nondestructive Assay Procedure – CCP-TP-115 Description – Stored Waste Examination Pilot Plant (SWEPP) Gamma Ray Spectrometer (SGRS)	Solids (S3000) Soils (S4000) Debris (S5000)	N/A	YES
14WAGS1	Nondestructive Assay Procedure – CCP-TP-019 Description – Waste Assay Gamma Spectrometer	Solids (S3000) Soils (S4000) Debris (S5000)	N/A	YES
14DTC1	Radiological characterization process using dose-to-curie (DTC) and modeling-derived scaling factors for assigning radionuclide values to RH waste stream  Dose-rate fractional contribution of Cs-137 and Co-60 using OSPREY La <sub>3</sub> Br(Ce) gamma detector  Procedure CCP-TP-504	Solids (S3000) Debris (S5000)	N/A	YES
N/A	Load Management	Solids (S3000) Soils (S4000) Debris (S5000)	N/A	YES
N/A	Quality Assurance Program	Solids (S3000) Soils (S4000) Debris (S5000)	N/A	YES