

ATTACHMENT B6		
Section	Change	Explanation of Change
Permit Attachment B6, List of Tables	Deleted Tables B6-5 and B6-6.	Deleted information related to radiography and VE since the generator/storage sites are no longer required to perform radiography and VE as waste analysis methods unless AK does not clearly substantiate the physical form of the waste and the absence of prohibited items. The Audit and Surveillance Program per Permit Attachment B6 is applicable to the mandated waste analysis methods. The justification to this change is provided in Sections 1.2.1.2 and 1.2.3 of the revised PMR and Appendix I of the Section 311 NOD Comment/Response Matrix.
B6-1	The Waste Isolation Pilot Plant (WIPP) Permittees' Audit and Surveillance Program shall ensure that: <del>1) the operators of each generator/storage site (site)</del> <u>and Permittee approved laboratory</u> that <del>plan to transport transuranic (TRU) mixed waste to the WIPP facility</del> conduct sampling and analysis of wastes in accordance with the current WIPP Waste Analysis Plan (WAP) (Permit Attachment B), and 2) the information supplied by each site to satisfy the waste screening and acceptability requirements of Section <del>B7-41</del> of the WAP is being managed properly. The Permittees will conduct these audits and surveillance at each site <u>and Permittee approved laboratory performing these activities</u> in accordance with a standard operating procedure (SOP).	Included requirement that Permittees conduct audits and surveillance at Permittee approved laboratories. The justification to this change is provided in Section 1.2.3 of the revised PMR.
B6-1	NMED personnel may observe these audits to validate the implementation of WAP requirements (Permit Attachment B) at each site <u>and Permittee approved laboratory</u> .	Included requirement that Permittees conduct audits and surveillance at Permittee approved laboratories. The justification to this change is provided in Section 1.2.3 of the revised PMR.
B6-1	The checklists for each site <u>and Permittee approved laboratory</u> shall include, at a minimum, the appropriate checklists found in Tables B6-1 through B6- <del>64</del> for the summary category groups undergoing audit.	Included requirement that Permittees conduct audits and surveillance at Permittee approved laboratories. The justification to this change is provided in Section 1.2.3 of the revised PMR.
B6-2	Audit procedures shall establish the responsibilities and methodology for planning, scheduling, performing, reporting, verifying, and closing announced and unannounced audits of sites <u>and Permittee approved laboratories</u> .	Included requirement that Permittees conduct audits and surveillance at Permittee approved laboratories. The justification to this change is provided in Section 1.2.3 of the revised PMR.

Section	Change	Explanation of Change
B6-2	Audit procedures shall establish the responsibilities and methodology for planning, scheduling, performing, reporting, verifying, and closing announced and unannounced audits of sites <u>and Permittee approved laboratories</u> .	Included requirement that Permittees conduct audits and surveillance at Permittee approved laboratories. The justification to this change is provided in Section 1.2.3 of the revised PMR.
B6-3	The Permittees will supply auditors/technical specialists with expertise in the Resource Conservation and Recovery Act (RCRA) requirements and knowledge of the analysis and documentation methods required to <del>verify the</del> <u>for</u> hazardous waste <del>characterization</del> <u>analysis</u> performed by the sites.	Editorial. Modified (changed “characterization” to “analysis”) for consistency with NMAC language in 20.4.1.500 NMAC (incorporating 40 CFR §264.13).
B6-3	1. Develop an audit plan and coordinate the preparation of an overall checklist to cover the scope of the audit, with consideration given to all nonconformances reported as specified in Permit Attachment B3 and to previous audit results from that site <u>or Permittee approved laboratory</u>	Included requirement that Permittees conduct audits and surveillance at Permittee approved laboratories. The justification to this change is provided in Section 1.2.3 of the revised PMR.
B6-3	2. Conduct the audit at the site <u>or Permittee approved laboratory</u>	Included requirement that Permittees conduct audits and surveillance at Permittee approved laboratories. The justification to this change is provided in Section 1.2.3 of the revised PMR.
B6-3	• Conduct inspection tours of waste generating stations, <u>sampling areas and equipment</u> , analytical laboratories, calibration facilities, administrative, and document control/record facility	Editorial to include sampling areas and equipment to be inspected during the inspection tour.
B6-3	• Complete checklist during the audit indicating the objective evidence observed verifies that the site <u>or Permittee approved laboratory</u> has met the QAOs for the program elements, methods, and the activities being audited. Add other items to the checklist as they are observed or as needed during the audit	Included requirement that Permittees conduct audits and surveillance at Permittee approved laboratories. The justification to this change is provided in Section 1.2.3 of the revised PMR.
B6-3	Audits will be conducted at least annually for each site involved in the waste <del>characterization</del> <u>analysis</u> program.	Modified (changed “characterization” to “analysis”) for consistency with NMAC language in 20.4.1.500 NMAC (incorporating 40 CFR §264.13).

Section	Change	Explanation of Change
B6-3	<p><u>For waste analysis processes performed for multiple sites by a single entity (e.g., mobile waste analysis vendors, Permittee approved laboratories) the procedures and processes used by these single entities will be audited at least annually for at least one site. Upon approval, the procedures and processes may be used at any site without requiring an additional audit. In any case, the acceptable knowledge process will be audited at least annually for each site involved in the waste analysis program.</u></p>	<p>Added language to provide clarify audit and surveillance frequency for waste analysis performed for multiple generator/storage sites by a single entity. The justification to this change is provided in Section 1.2.3 of the revised PMR.</p>
B6-4	<p>The conduct of the audit shall commence with an entrance meeting, conducted by the audit team leader, with site or facility <u>Permittee approved laboratory</u> management. At this meeting, the audit objectives and scope, the specific areas to be audited, the processes or functions to be observed, and the site <u>or Permittee approved laboratory</u> - participation required, including <u>site</u> interfaces, will be identified.</p>	<p>Included requirement that Permittees conduct audits and surveillance at Permittee approved laboratories. The justification to this change is provided in Section 1.2.3 of the revised PMR.</p>
B6-4	<p>Audits shall be performed using approved audit checklists that include the checklists in Tables B6-1 to B6-<del>64</del> for the summary category groups undergoing audit. Consistency of evaluation shall be ensured before the audit through site <u>or Permittee approved laboratory</u> QAPjP approval (see Permit Attachment B5). QAPjPs for each site <u>or Permittee approved laboratory</u> shall incorporate the same requirements from the WAP. Objective evidence shall be examined (to the depth necessary) to determine if the identified activities, procedures, or QAOs are adequate and are being effectively implemented.</p>	<p>Corrected formatting.  Included requirement that Permittees conduct audits and surveillance at Permittee approved laboratories. The justification to this change is provided in Section 1.2.3 of the revised PMR.</p>

Section	Change	Explanation of Change
B6-4	<p>Site Audits may not include all waste summary category groups, and thus some audit checklists or portions of checklists (Tables B6-1 through B6-62) may not be applicable to some sites <u>or Permittee approved laboratories</u> (e.g., <u>radiography is not used because the site chooses to visually examine all wastes headspace gas sampling and analysis is not used because debris waste is not being analyzed by the site</u>).</p>	<p>Corrected formatting.</p> <p>Included requirement that Permittees conduct audits and surveillance at Permittee approved laboratories. The justification to this change is provided in Section 1.2.3 of the revised PMR.</p> <p>Deleted information related to radiography and VE since the generator/storage sites are no longer required to perform radiography and VE as waste analysis methods unless AK does not clearly substantiate the physical form of the waste and the absence of prohibited items. The Audit and Surveillance Program per Permit Attachment B6 is applicable to the mandated waste analysis methods. The justification to this change is provided in Sections 1.2.1 and 1.2.3 of the revised PMR and Appendix I of the Section 311 NOD Comment/Response Matrix.</p> <p>Editorial to provide another example.</p>
B6-4	<p>In addition, in cases where discrepancies exist between the audit checklists in Tables B6-1 through B6-64 and the Permit, Permit requirements take precedence.</p>	<p>Corrected formatting.</p>
B6-4	<p>Audits shall include <u>site</u> personnel interviews, document and record reviews, observations of operations, and any other activities deemed necessary by the auditors to meet the objectives of the audit. Observations or deficiencies identified during the audit will be investigated or evaluated, as necessary, to determine if they are isolated conditions or represent a general breakdown of the waste <u>characterization analysis</u> quality assurance program.</p>	<p>Editorial</p> <p>Modified for consistency with NMAC language in 20.4.1.500 NMAC (incorporating 40 CFR §264.13).</p>
B6-4	<p>During audit interviews or audit meetings, site <u>or Permittee approved laboratory</u> personnel may be advised of deficiencies identified within their areas of responsibility to establish a clear understanding of the identified condition.</p>	<p>Included requirement that Permittees conduct audits and surveillance at Permittee approved laboratories. The justification to this change is provided in Section 1.2.3 of the revised PMR.</p>
B6-4	<p>The site <u>or Permittee approved laboratory</u> personnel will be given the opportunity to correct any deficiency that can be corrected during the audit period. Deficiencies and observations will be documented and included as part of the final audit report.</p>	<p>Included requirement that Permittees conduct audits and surveillance at Permittee approved laboratories. The justification to this change is provided in Section 1.2.3 of the revised PMR.</p>

Section	Change	Explanation of Change
B6-4	RCRA-related cars identified by the site <u>or Permittee approved laboratory</u> during self-audits will be evaluated during the Permittees' audit and surveillance program and tracked in the Permittees' tracking systems.	Included requirement that Permittees conduct audits and surveillance at Permittee approved laboratories. The justification to this change is provided in Section 1.2.3 of the revised PMR.
B6-4	The Permittees review the CAR, determine validity (assures that a requirement has in fact been violated), classify the significance of the deficiency, assign a response due date, and issue the CAR to the site <u>or Permittee approved laboratory</u> . The site <u>or Permittee approved laboratory</u> reviews the CAR, evaluates the extent and cause of the deficiency, and provides a response to the Permittees indicating the remedial actions and actions taken to preclude recurrence. The Permittees review the response from the site <u>or Permittee approved laboratory</u> and, if acceptable, communicate the acceptance to the site <u>or Permittee approved laboratory</u> . The site <u>or Permittee approved laboratory</u> completes remedial actions and actions to preclude recurrence.	Included requirement that Permittees conduct audits and surveillance at Permittee approved laboratories. The justification to this change is provided in Section 1.2.3 of the revised PMR.
B6-4	The sites <u>or Permittee approved laboratories</u> shall submit corrective action plans to eliminate the deficiency stated on the CAR, including a resolution of the acceptability of any data generated prior to the resolution of the corrective action.	Included requirement that Permittees conduct audits and surveillance at Permittee approved laboratories. The justification to this change is provided in Section 1.2.3 of the revised PMR.
B6-4	An exit meeting will be conducted by the lead auditor prior to departure of the audit team from the site <u>or Permittee approved laboratory</u> . This meeting will include site <u>or Permittee approved laboratory</u> management personnel, and may include DOE field office personnel. All draft audit results will be presented to the site <u>or Permittee approved laboratory</u> management.	Included requirement that Permittees conduct audits and surveillance at Permittee approved laboratories. The justification to this change is provided in Section 1.2.3 of the revised PMR.
B6-4	The audit report will be prepared, approved, and issued to the site <u>or Permittee approved laboratory</u> within thirty (30) days of the completion of the audit by the Permittees. NMED shall receive a copy of the audit report upon issuance for information purposes.	Included requirement that Permittees conduct audits and surveillance at Permittee approved laboratories. The justification to this change is provided in Section 1.2.3 of the revised PMR.
B6-4	The audited site <u>or Permittee approved laboratory</u> will respond to any deficiencies and observations within thirty (30) days after receipt of any CARS and indicate the corrective action taken or to be taken.	Included requirement that Permittees conduct audits and surveillance at Permittee approved laboratories. The justification to this change is provided in Section 1.2.3 of the revised PMR.

Waste Isolation Pilot Plant  
 Class 3 Permit Modification Request  
 June 2005

Section	Change	Explanation of Change
B6-4	Trend reports will be issued as necessary to provide a "lessons learned" announcement to other sites <u>or Permittee approved laboratories</u> who might benefit from program improvements implemented as a result of resolutions to the specific situations discovered at the performance of these audits.	Included requirement that Permittees conduct audits and surveillance at Permittee approved laboratories. The justification to this change is provided in Section 1.2.3 of the revised PMR.
Table B6	Changes as reflected in Table B6 included in PMR.	Changes made to reflect changes in PMR.