

# memorandum

Carlsbad Area Office  
Carlsbad, New Mexico 88221

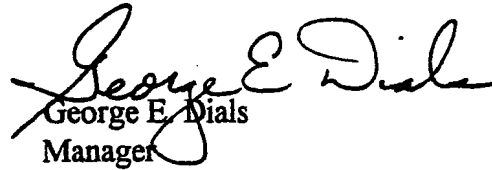
DATE: SEP 12 1997

REPLY TO  
ATTN OF: CAO:NTP:RAS 97-1875 UFC 5822

SUBJECT: Site Certification of Los Alamos National Laboratory

TO: G. Thomas Todd, Area Manager, LAAO

The Carlsbad Area Office (CAO) has evaluated the Los Alamos National Laboratory's (LANL) readiness to characterize, certify, and transport defense transuranic (TRU) waste to the WIPP. (See attachment 1) Based on this evaluation, the CAO Manager is granting authority to LANL to characterize and certify retrievably stored (legacy) debris waste and transportation authority for the use of the TRUPACT-II. These authorities are limited to those systems and processes audited during the site certification audits of May 12-16, 1997, August 18-22, 1997, and September 10-11, 1997. (See attachment 2) TRU waste characterization, certification, or transportation using revised or new processes and systems must be evaluated by CAO prior to their implementation.

  
George E. Dials  
Manager

## Attachments

cc w/attachments:  
K. Hunter, CAO  
A. Miner, CAO  
M. McFadden, CAO  
D. Brown, CAO  
C. Wayman, CAO  
B. LeBrun, LAAO

## LANL CERTIFICATION PROGRAM STATUS

The site certification panel was convened to consider the readiness of LANL to characterize, certify, and transport waste to the WIPP. The panel consisted of the CAO Characterization, Certification, Transportation, and QA Managers, and the ORC Compliance Engineer. The panel unanimously recommended that LANL be granted authority to characterize and certify legacy debris waste and to transport TRU waste using the TRUPACT-II

### STATUS

- All program elements are complete
    - All LANL required site documents are approved and in place identifying how the site complies with CAO QA and technical requirements
      - Waste Certification Plan, TRAMPAC, and associated QA Plans
      - QAPjP
      - QA Graded Approach Procedure
      - QAPD Matrix
      - Sampling Plan
      - Standard Operating Procedures
    - All required letters and designations are in place
      - Site Project Manager, Waste Certification Official, and Transportation Certification Official
      - Written agreement to accept returned shipments
    - LANL participation in the Performance Demonstration Program for headspace gas and nondestructive assay is satisfactory
  - CAO has determined that LANL's QA and technical program is adequate and effectively implemented
    - CAO has completed three certification audits of LANL (A-97-01, A-97-07, A-97-16)
    - All CARs resulting from these audits have been closed
  - All program processes and procedures have been developed and implemented by LANL and evaluated by CAO except:
    - Newly generated waste
    - Solid sampling and analysis
- Note: Transportation and legacy debris waste are not affected by these exclusions
- LANL's existing program was designed to certify debris waste in FY 98 and all waste types in FY 99
  - No outstanding issues were brought up by EPA or EEG at the final LANL certification audit close-out meeting


**RECOMMENDATION**

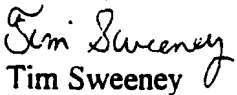
Recommend that the CAO Manager grant characterization and certification authority to LANL for retrievably-stored (legacy) debris waste and transportation authority for the use of the TRUPACT-II. It is also recommended that these authorities be limited to those systems and processes audited during the May 12-16, 1997, August 18-22, 1997, and September 10-11, 1997 site certification audits.

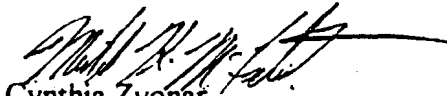
**CONCURRENCE**

 9/12/97  
Robert Stroud  
Waste Certification Manager

 9/12/97  
Denny Brown  
Quality Assurance Manager

 9/12/97  
Don Galbraith  
Acting Waste Characterization Manager

 9/12/97  
Tim Sweeney  
Transportation Manager

  
Cynthia Zvonar  
Compliance Engineer

**ELEMENTS AUDITED DURING CAO CERTIFICATION AUDITS  
OF LANL (A-97-01, A-97-07, and A-97-16)**

<b>PROGRAM ELEMENT</b>	<b>PROCEDURE</b>
Developing Procedures	QP-1.1-001
Document Control	QP-1.1-002
Qualification/Training	QP-1.1-003
Records Management	QP-1.1-004
Procurement	QP-1.1-005
Software Control	QP-1.1-006
Nonconformances	QP-1.1-007
Corrective Action	QP-1.1-008
Surveillances	QP-1.1-009
Data V&V	QP-1.1-010
Data Level Review	QP-1.1-011
Log and Notebooks	QP-1.1-012
Assessments	QP-1.1-013
Inspection and Testing	QP-1.1-016
Peer Review	QP-1.1-017
M&TE	QP-1.1-018
Root Cause Analysis	QP-1.1-020
Acceptable Knowledge	QP-1.1-021
PDP Blind Sample	QP-1.1-022
Data Reconciliation	QP-1.1-023
Reporting Data to CAO	QP-1.1-024
Trend Analysis	QP-1.1-026
Audits	QP-1.1-027
Reconciliation of Info	QP-1.1-028
Grading	QP-1.1-029
Work Suspension	QP-1.1-030
Document Review	QP-1.1-031
Drum Tracking	QP-1.1-032
Mgmt Assessments	QP-1.1-033
WWIS Data Entry	QP-1.1-034

**ELEMENTS AUDITED DURING CAO CERTIFICATION AUDITS  
OF LANL (A-97-01, A-97-07, and A-97-16)**

PROGRAM ELEMENT	PROCEDURE
WWRRF VE	DTP-1.2-001
WWRRF Video	DTP-1.2-002
UCL 90 Calc	DTP-1.2-006
RTR	DTP-1.2-008
PAN Operations	DTP-1.2-009
PAN Calibration	DTP-1.2-010
Calc for Samples	DTP-1.2-013
Random Selection	DTP-1.2-014
Calc for VE	DTP-1.2-015
HGAS VOCs	DTP-1.2-018
HGAS Hydrogen Meth	DTP-1.2-019
Container Tracking	DTP-1.2-020
HGAS Batch Data	DTP-1.2-025
FRAM	DTP-1.2-029
TRUPACT Procedures	DTP-1.2-030
Leak Test Detector	DTP-1.2-031
Gravity Lift Fixture	DTP-1.2-032
Waste Cert Imp	DTP-1.2-033
Waste Trans Cert	DTP-1.2-034
Offsite Trans	DTP-1.2-035