



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

JUN 07 2018

Mr. John E. Kieling, Chief
Hazardous Waste Bureau
New Mexico Environmental Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, NM 87505-6303

Subject: Request for Extension of Time to Perform the Annual Recertification Audit for the Sandia National Laboratory Central Characterization Program at an Undetermined Time

Dear Mr. Kieling:

The purpose of this letter is to request an extension of time to perform the TRU Waste Recertification audit for the Sandia National Laboratory (SNL) Central Characterization Program (CCP) from July 20, 2018 to a future undetermined date. An extension is permissible pursuant to the Waste Isolation Pilot Plant (WIPP) Hazardous Waste Facility Permit (HWFP) Part 1, section 1.10.3. Pursuant to permit Attachment C6, section C-63, "Audits will be conducted at least annually for each site involved in the waste characterization program." The extension, if granted, would direct that the audit be scheduled and completed on a future date.

The Sandia program is currently unfunded to perform waste characterization activities. Work at the Sandia site, which is the host site location for CCP waste characterization activities, was last performed in August of 2014. This work included Nondestructive assay (NDA) and Visual Examination (VE) of Remote Handled (RH) waste containers and generation of batch data reports for these analyses. The overall SNL/CCP program was suspended in fiscal year 2015 and shipments of waste to the WIPP site were discontinued. Desktop recertification audits have been performed annually to 2017. The SNL recertification Audit A-17-24 results indicate that the SNL/CCP operations continue to be in a state of suspension.

Due the cessation of activities at the Sandia host site location and in turn by the CCP program, the Carlsbad Field Office (CBFO) proposes to suspend the certification for the Sandia/CCP program. Once waste characterization activities resume at the Sandia host site location, the CBFO will conduct a full site specific audit as a basis for reinstating authority to perform waste characterization activities and reestablishment of waste shipments from the SNL site to the WIPP. The audit will evaluate SNL/CCP program updates put in place to account for reactivation of the waste characterization program and written to comply with the WIPP HWPF, NM 489013088-TSDF requirements that have changed since the suspension of the SNL/CCP program. This will focus CBFO assessment efforts on active programs and allow for evaluation of the Sandia/CCP program once updates are finalized and determined ready for implementation.

Mr. John E. Kieling

-2-

JUN 07 2018

Should you have any questions concerning this notification, please contact Mr. Kenneth Princen, Assistant Manager, Office of the National TRU Program at (575) 234-7053.

Sincerely,

Signatures on File

Todd Shrader, Manager
Carlsbad Field Office

Bruce C. Covert, Project Manager
Nuclear Waste Partnership LLC

cc:

J. Carswell, CBFO	*ED	M. Valentine, NWP	ED
M. Brown, CBFO	ED	R. Chavez, RES	ED
K. Princen, CBFO	ED	J. Ellis, EPA	ED
D. Miehl, CBFO	ED	T. Peake, EPA	ED
M. Navarrete, CBFO	ED	E. Feltcorn, EPA	ED
N. Castaneda, CBFO	ED	R. Maestas, NMED	ED
T. Carver, CBFO	ED	M. McLean, NMED	ED
H. Cruickshank, CBFO	ED	H. Tellez, NMED	ED
C. Fesmire, CBFO	ED	D. Biswell, NMED	ED
D. Standiford, CBFO	ED	T. Runyon, CTAC	ED
A. Stone, CBFO	ED	P. Martinez, CTAC	ED
A. Walker, CBFO	ED	C. Castillo, CTAC	ED
D. Misch, DOE-CH	ED	K. Lickliter, CTAC	ED
K. Joshi, DOE-CH	ED	J. Schuetz, CTAC	ED
D. Rast, DOE-SNL	ED	G. White, CTAC	ED
J. Todd, DOE-SNL	ED	Site Documents	ED
V. Ballew, NWP	ED	RCRA Chronology Record	ED
J. Britain, NWP	ED	WIPP Operating Record	ED
J. Carter, NWP	ED	WWIS Database Administrators	ED
J. Harvill, NWP	ED	CBFO M&RC	
A. Johnson, NWP	ED	*ED denotes electronic distribution	
R. Lee, NWP	ED		
M. McDaniel, NWP	ED		
B. Pace, NWP	ED		
M. Pearcy, NWP	ED		
M. Ramirez, NWP	ED		
R. Reeves, NWP	ED		
T. Sellmer, NWP	ED		
C. Simmons, NWP	ED		
D. Wade, NWP	ED		