



## Department of Energy

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

March 24, 2021

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

Subject: Plan of Action for 2021 Audits of WIPP's Generator Sites

- Reference: 1) CBFO letter CBFO:OEP:MRB:VV:20-0226:UFC 5487.00 from Gregory Sosson, Acting Manager, U.S. Department of Energy Carlsbad Field Office, and Sean Dunagan, President and Project Manager, Nuclear Waste Partnership, to Kevin Pierard, Chief, Hazardous Waste Bureau, dated March 31, 2020; Subject: Request for an Extension of Time for Certain Hazardous Waste Facility Permit Required Inspections, Reports, Personnel Training and Recertification Audits due to Coronavirus Disease 2019 (COVID-19) Preventive Measures at the Waste Isolation Pilot Plant Facility, Hazardous Waste Facility Permit Number NM4890139088-TSDF
- 2) NMED letter from Kevin Pierard, Chief, Hazardous Waste Bureau, to Reinhard Knerr, Manager, U.S. Department of Energy Carlsbad Field Office, and Sean Dunagan, Project Manager, Nuclear Waste Partnership LLC, dated September 11, 2020; Subject: Information Request Concerning the Hazardous Waste Facility Permit Audit and Surveillance Program, Waste Isolation Pilot Plant, EPA I.D. Number NM4890139088
- 3) CBFO letter CBFO:OQA:MRB:JM:20-0894:UFC 2300.00 from Reinhard Knerr, Manager, U.S. Department of Energy Carlsbad Field Office, to Kevin Pierard, Chief, Hazardous Waste Bureau, dated October 13, 2020; Subject: Information Request Concerning the Hazardous Waste Facility Permit Audit and Surveillance Program

Dear Mr. Pierard:

The purpose of this letter is to request an extension of time for completion of annual recertification audits of TRU waste generator sites as required by the WIPP Hazardous Waste Facility Permit (HWFP), Attachment C, Waste Analysis Plan (WAP) during the COVID-19 pandemic for calendar year 2021. This request for an extension of time is being made in anticipation of continued travel restrictions through calendar year 2021.

Due to travel and site access restrictions, the Carlsbad Field Office (CBFO) staff and contractors have conducted generator/storage site recertification audits remotely through livestreaming technologies at some generator/storage facilities. As discussed with the New Mexico Environment Department (NMED) Waste Isolation Pilot Plant (WIPP) Group Manager and staff, using livestreaming methods during annual re-certification audits of transuranic (TRU) waste stream characterization methods (Real-Time Radiography and Visual Examination) meet the intent of requirements as specified in the WIPP HWFP, WAP Section C6-1 "Department of Energy (DOE) will conduct these audits and surveillances at each site performing these activities in accordance with standard operating procedures (SOP)".

The CBFO understands that NMED personnel will not be traveling to the generator/storage sites during calendar year 2021 to observe recertification audits. The CBFO will continue to perform annual recertification audits for those activities that can be performed remotely. Where possible, CBFO will make every effort to conduct evaluations of TRU waste characterization activities using livestreaming methods to meet WIPP HWFP, WAP Section C6-1 requirements where NMED personnel may observe TRU waste stream characterization methods for Real-Time Radiography and Visual Examination. If CBFO cannot evaluate TRU waste characterization methods performed during the audit by livestreaming methods, CBFO will evaluate all field activities during the next recertification audit to ensure WIPP HWFP, WAP Section C6-1 requirements are met. The CBFO will continue to document audit results in interim and final audit reports. As previously stated in the referenced correspondence, performing recertification audits remotely are not the normal method for performing the recertification audits required by the HWFP.

Once restrictions on travel and site access are lifted and on-site audit and surveillance activities are allowed, CBFO will resume normal on-site audit activities at generator sites. Although the timing for lifting of the current restrictions is unknown, the audit schedule for 2021 is a top priority and CBFO staff and contractors will continue to look at options for conducting recertification audits compliant to the WIPP HWFP, WAP requirements.

The CBFO continues to successfully evaluate the adequacy, implementation, and effectiveness of the technical and Quality Assurance (QA) activities being performed by the certified programs including work performed at the generator/storage sites. Please contact Mr. Darren Jolley, Director, CBFO Office of Quality Assurance, at (435) 241-9689 should you have any questions concerning this notification.

Sincerely,

Signature on File

Reinhard Knerr  
 Manager  
 Carlsbad Field Office

cc:

- |                      |     |                                     |    |
|----------------------|-----|-------------------------------------|----|
| L. Perkins, EM-3.113 | *ED | P. Martinez, CTAC                   | ED |
| M. Bollinger, CBFO   | ED  | R. Castillo, CTAC                   | ED |
| M. Hall, CBFO        | ED  | S. Martinez, CTAC                   | ED |
| K. Princen, CBFO     | ED  | P. Yanez, CTAC                      | ED |
| T. Carver, CBFO      | ED  | D. Harvill, CTAC                    | ED |
| A. Walker, CBFO      | ED  | G. White, CTAC                      | ED |
| J. Lopez, CBFO       | ED  | J. Maupin, CTAC                     | ED |
| M. Stapleton, CBFO   | ED  | A. Urquidez, RES                    | ED |
| R. Maestas, NMED     | ED  | J. Haschets, RES                    | ED |
| D. Biswell, NMED     | ED  | R. Chavez, RES                      | ED |
| M. McLean, NMED      | ED  | CBFO M&RC                           | ED |
| N. Barka, NMED       | ED  | CBFO QA File                        |    |
| T. Runyon, CTAC      | ED  | *ED denotes electronic distribution |    |