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Environmental Programs & Waste Environmental Services

for **CATEGORIZATION AND TRENDING OF NEW MEXICO ENVIRONMENT DEPARTMENT (NMED) COMMENTS ON CONSENT ORDER DOCUMENTS**

APPROVAL SIGNATURES:

Subject Matter Expert:	Organization	Signature	Date
Linda Nonno	WES-EDA	Signature on file	2/24/10
Responsible Line Manager:	Organization	Signature	Date
Craig Eberhart	WES-EDA	Signature on file	3/9/10

1.0 PURPOSE AND SCOPE

This standard operating procedure (SOP) states the responsibilities and describes the process for categorizing and trending comments received from the New Mexico Environment Department (NMED) for Environmental Programs Directorate (ADEP) documents submitted to the NMED under the requirements of the Compliance Order on Consent (Consent Order). Comments are received from the NMED in a variety of forms, including Notices of Approval, Notices of Disapproval (NODs), Approvals with Modifications, and reviews of plans or reports.

Categorization and trending of NMED comments are conducted in order to assess the types of comments received from NMED and ultimately to improve the quality of future ADEP documents

2.0 BACKGROUND AND PRECAUTIONS

The EP-Waste and Environmental Services (EP-WES) Division's Deliverables Tracking Database Manager is responsible for categorizing comments. The Contractor Assurance Office representative deployed to ADEP is responsible for trending comments.

2.1 Precautions

When categorizing comments, care must be exercised to not recategorize comments made on the document in earlier correspondence (i.e., to count the same comment twice). In addition, it is necessary to review LANL's responses to comments in order to categorize a comment appropriately.

3.0 EQUIPMENT AND TOOLS

None.

4.0 STEP-BY-STEP PROCESS DESCRIPTION

4.1 Categorizing Comments

Deliverables Tracking Database Manager

1. Obtain NMED comments for work plans and reports from LASO or other source (normally via email). NMED comments are received from the NMED (via IRM or DOE) in a variety of forms including Notices of Approval, NODs, Approvals with Modifications, or reviews of plans or reports. Obtain LANL responses to NODs from the Document Production Team Manager.

   Comments on CME plans and reports are not categorized.

2. Select the most appropriate fit for each comment from the following seven categories. Each category contains descriptions of the types of comments that fit into that category.

Comments that address multiple issues or that have multiple parts have the potential to be categorized into more than one category. However, if the multiple parts within a single comment are related to each other or require similar actions, the parts will be treated as a single comment.

For comments that are difficult to bin, include a brief explanation of the rational for comment category selection on the hard copy of the submittal.

1) **Typographical or compositing:** Comments related to sentence composition, edits, or typographical errors.

2) **Technical errors in tables or text:** Comments related to errors in tables, figures or text (i.e. errors with figure dates/captions, not properly citing references, not defining acronyms, errors in reporting data values or units); text inconsistencies occurring among different sections or among different appendixes of the document; discrepancies/inconsistencies between tables, figures and/or text; and any information noted to be lacking that should have been included, etc.

3) **Technical differences between LANL and NMED:** Comments related to non-agreement between LANL and NMED on technical approach such as investigation methods or sampling methods (i.e. difference in placement of sampling locations, number of samples, etc.), use of different databases or models. Also included are comments covering discrepancies in monitoring schedules or plan/report schedules. NOTE: These are not the same as those provided in the final paragraph of the NOD or other comment document.

4) **Clarification or data display:** Comments related to further justification, additional explanations; discussion or rationale of investigation methods, site conditions, data (i.e the way the data is displayed), sources of contaminants, conclusions, etc. Includes comments related to the incompleteness of the explanation/data or Data Quality Objective justification for the sampling.

5) **Additional data or work requested:** Comments related to NMED's requirement for additional sampling, analytical suites, monitoring, fieldwork, or additional work plans. Also included, comments that require additional data information/results not initially provided (but not necessarily additional sampling) or additional information pertaining to investigation or assessment methods. This category also includes comments that may have programmatic impact. Such comments pertain to extensive/lab-wide requirements imposed by NMED related to investigation/sampling methods (i.e 20% of all samples must be submitted for PCB analysis).

6) **No response required:** Comments that need no additional requirements/actions such as those that merely stress or reiterate statements found in the plan or report or comments that provide concurrence with statements in plans or reports. This category also includes comments emphasizing the content of specific Consent Order requirements but for which NMED does not expect a response. Also included are instructions provided for a future event.

7) **Other:** Any comment that does not fit into categories 1) through 6) above. Comments included in this category are not pertinent to the quality of the document and do not result in a revision of the document. Also, included are comments based on NMED's misinterpretation of information in the report or NMED's having missed information already included in the report. NOTE: To determine NMED misreads/interpretations, LANL Responses must be reviewed.

3. Record the number and the name of the category by each comment on a hardcopy printout of the LANL response to the NMED comment letter.

- Notated printouts are kept in a file in the care of the Deliverables Tracking Database Manager.

4. Record the total number of comments provided in the NMED letter and the number of comments that fall under each category in the Deliverables Tracking Database.

    - Access the Deliverables Tracking Database on the P: network drive (projects on 'win.lanl.gov\wes'(P:). Open the "PRS" folder; open the "Deliverable Tracking" folder; and open the "Deliv Tracker" Microsoft Access file.

    - Under Objects at the left sidebar, click on "Tables". Open the table entitled "dbo_Deliverables". Scroll to find the NMED letter and record the total number of comments provided in the letter under the column headed "TOTAL_COMMENTS_LETTER". Record the number of comments for each category in the appropriate comment column. Close the "dbo_deliverables" file. A popup box appears asking if you want to save the layout of the table; select "no".

    - Scan the notated response letter and file it electronically under P:/Deliverables/NMED Comment Assessment/Binned NMED Letters/FY_.

5. Monthly, provide an "NMED Comment Assessment Report" to the ADEP Deployed Contractor Assurance Office representative. This report provides the title of each NMED comment response letter submitted for the fiscal year, the total number of comments, and the number of comments under each category. Each month provides a cumulative record that includes the previous months' tabulations.

    The NMED Comment Assessment Report is automatically generated from the Deliverables Tracking Database. To access the report

    - go the Deliverables Tracking Database on the P: network drive (projects on 'win.lanl.gov\wes'(P:). Open the "PRS" folder; open the "Deliverable Tracking" folder; and open the "Deliv Tracker" Microsoft Access file.

    - under Objects at the left sidebar, click on "Reports". Open the report entitled "NMED CommentAssessmentAll_FY(appropriate fiscal year)". Select "Export" from Access' File menu. A window pops up; under the "Save" pulldown menu, select "projects on 'win.lanl.gov\wes'"; select the "Deliverables" folder; then select the "NMED Comment Assessment" folder. Under the "Save As Type" pulldown menu, select "Snapshot Format". Under "File name" type the appropriate file name. Click on the Export button at the bottom of the window.

    Once the NMED Comment Assessment Report is saved to the designated folder, provide the report via email to the ADEP Deployed Contractor Assurance Office Representative.

    Annually, at the beginning of each October, a report is generated that provides a cumulative tabulation of the comments received in the previous fiscal year. This report provides 1) the title of each LANL response to the NMED comment letter received during the previous fiscal year, 2) a tabulation of the total number of comments received in those letters, and 3) a tabulation of the total number of comments received under each category. A copy of the cumulative report is submitted to the Records Processing Facility.

4.2   Trending Comments

ADEP Deployed Contractor Assurance Office Rep

1. Obtain the monthly "NMED Comment Assessment Report" from the Deliverables Tracking Database Manager via email.

2.   Using the methodology documented in PBView software, calculate the error and clarification metrics for the following comment categories (as agreed upon with DOE LASO):

- Typographical or compositing,

- Technical errors in tables or text, and

- Clarification or data display.

Report the results in the Directors Performance Metric Summary(DASHBORD) for the Laboratory.

3.   Using the PBView software, produce trends; archive variance reports; and distribute to ADEP project directors, LASO management, and Laboratory management via the Stop Light Status Chart.

4.3   Records Management

Deliverables Tracking Database Manager

1.   At the beginning of each fiscal year, the Deliverables Tracking Database Manager submits a copy of the cumulative NMED Comment Assessment Report to the Records Processing Facility according to EP-DIR-SOP-4004, Records Transmittal and Retrieval Process. The cumulative NMED Comment Assessment Report tabulates all NMED comments received in the previous fiscal year. (See Section 4.1, Step 5 for additional details about the cumulative report).
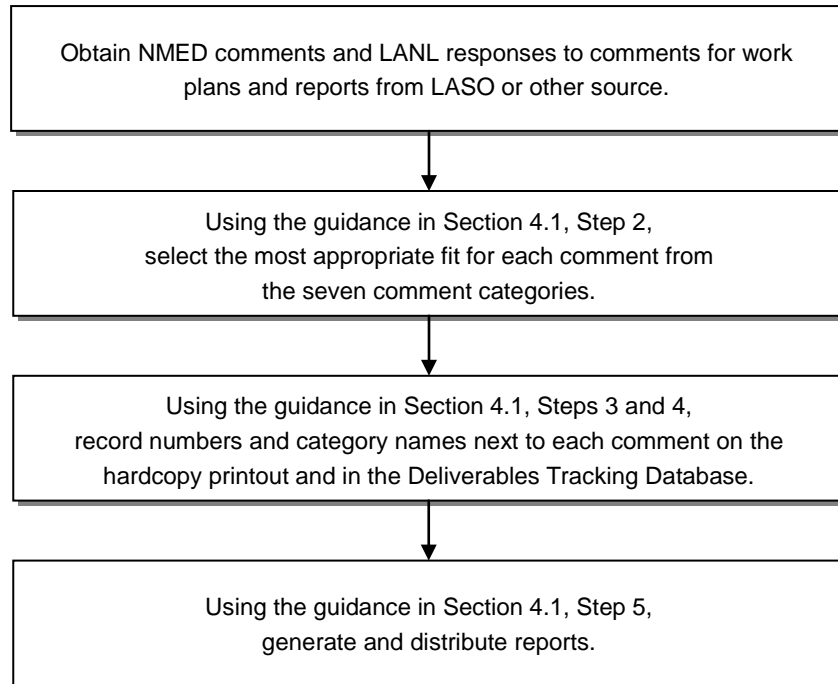
5.0   DEFINITIONS

Compliance Order on Consent—For the Environmental Programs Directorate, an enforcement document signed by NMED, DOE, and the Regents of the University of California on March 1, 2005, that prescribes the requirements for corrective action at the Laboratory. The purposes of the Consent Order are (1) to define the nature and extent of releases of contaminants at, or from, the facility; (2) to identify and evaluate, where needed, alternatives for corrective measures to clean up contaminants in the environment and to prevent or mitigate the migration of contaminants at, or from, the facility; and (3) to implement such corrective measures. The Consent Order supersedes the corrective action requirements previously specified in Module VIII of the Laboratory's Hazardous Waste Facility Permit.

Notices of Approval, of Approval with Modification, or of Disapproval—Notices issued by the New Mexico Environment Department (NMED). Upon receipt of a work plan, schedule, report, or other deliverable document, NMED reviews the document and approves the document as submitted, modifies the document and approves it as modified, or disapproves the document. A notice of approval means that the document is approved as submitted. A notice of approval with modifications means that the document is approved but with modifications specified by NMED. A notice of disapproval means that the document is disapproved and it states the deficiencies and other reasons for disapproval.
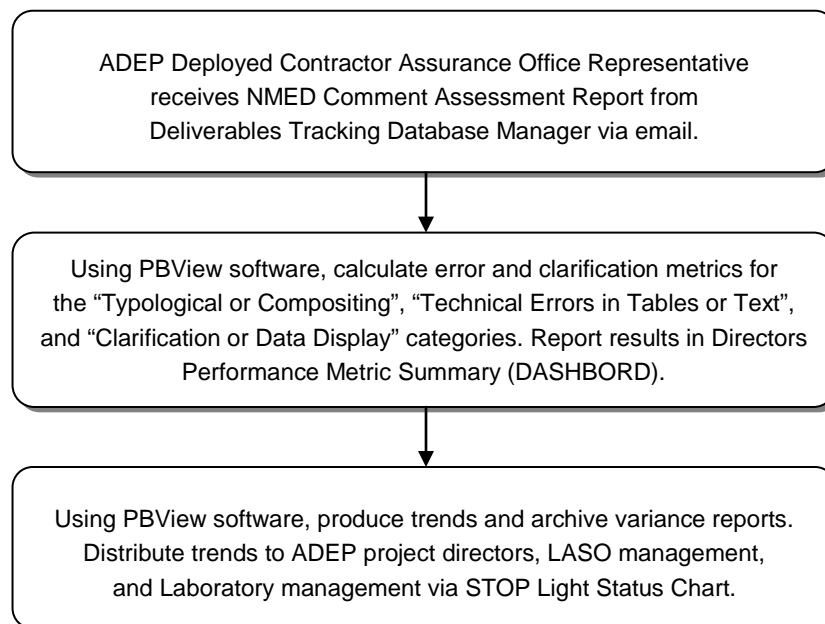
6.0   PROCESS FLOW CHARTS

NMED COMMENT CATEGORIZATION
(Responsibility of Deliverables Tracking Database Manager)

Obtain NMED comments and LANL responses to comments for work plans and reports from LASO or other source.

Using the guidance in Section 4.1, Step 2, select the most appropriate fit for each comment from the seven comment categories.

Using the guidance in Section 4.1, Steps 3 and 4, record numbers and category names next to each comment on the hardcopy printout and in the Deliverables Tracking Database.

Using the guidance in Section 4.1, Step 5, generate and distribute reports.

NMED COMMENT TRENDING
(Responsibility of ADEP Deployed Contractor Representative)

ADEP Deployed Contractor Assurance Office Representative receives NMED Comment Assessment Report from Deliverables Tracking Database Manager via email.

Using PBView software, calculate error and clarification metrics for the "Typological or Compositing", "Technical Errors in Tables or Text", and "Clarification or Data Display" categories. Report results in Directors Performance Metric Summary (DASHBORD).

Using PBView software, produce trends and archive variance reports. Distribute trends to ADEP project directors, LASO management, and Laboratory management via STOP Light Status Chart.

7.0   ATTACHMENTS

Not applicable.

8.0   REVISION HISTORY

Revision No. *[Enter current revision number, beginning with Rev.0]*	Effective Date *[DCC inserts effective date for revision]*	Description of Changes *[List specific changes made since the previous revision]*	Type of Change *[Technical (T) or Editorial (E)]*
0	10/30/2009	New Document	T
1	3/23/10	Updated SOP to reflect that comments are no longer binned solely on the comment, but also reflect LANL's responses to the comments.	T