

CORRES. CONTROL OUTGOING LTR. NO.		
DOE ORDER #		
98-RF-03981		
DIST.	LTR	ENC
BENSUSSEN, STAN		
BORMOLINI, ANN		
BRAILSFORD, M.		
BURDGE, LARRY		
CARD, BOB		
FULTON, JOHN		
HARDING, WYNN		
HILL, JOHN		
MARTINEZ, LEN		
PARKER, ALAN	X	X
POLSTON, STEVE		
SHELTON, DAVE		
TUOR, NANCY		
CROWE, STEVE		
HEDAHL, TIM		
MATHIS, BRIAN		
RODGERS, ALAN	X	X
ANDERSON, S.		
BUTLER, LANE		
GREENGARD, TOM		
HAHN, STEVE		
HICKLE, GORDON		
JENNINGS, MIKE		
KENNEDY, C.		
LAHOUD, RUSS		
LAVORATO, K.		
SHAFER, DOUG		
FERGUSON, KEN	X	X
GILMARTIN, TOM	X	X
SHERRIL, DEE	X	X
FERRERA, KEN	X	
GERMAIN, AL	X	
CORR. CONTROL	X	X
ADMIN REC/B116	X	X
PATS/T130G		
CLASSIFICATION:		
UCNI		
UNCLASSIFIED		
CONFIDENTIAL		
SECRET		
AUTHORIZED CLASSIFIER SIGNATURE: EXEMPT PER: CEX-266-95		
Date:		
IN REPLY TO RFP CC NO.:		
ACTION ITEM STATUS: <input type="checkbox"/> PARTIAL/OPEN <input type="checkbox"/> CLOSED		
LTR APPROVALS:		
ORIG. & TYPIST INITIALS: SAA:pmm		



August 04, 1998

98-RF-03981

Distribution

**SAFEGUARDS TERMINATION VARIANCE, PHASE II - SAA-015-98**

The attached "Variance Request" is submitted for your review and comment. I have significantly revised the format since the last time this document was sent out for review, although the content has not changed. Please review the "Variance Request" and it's associated appendices.

Submittal of this "Variance Request" has recently been elevated in importance. As such, I have scheduled a table-top comment resolution meeting for Tuesday, August 11, 1998 beginning at 10:30am in the T130C Conference Room to finalize the request prior to submittal to the Department of Energy. Please plan to attend this meeting.

Scott A. Anderson  
Waste & Remediation Operations  
Kaiser-Hill Company, L.L.C.

SAA:pmm

Attachment:  
As Stated

Distribution

John Bower  
Jody Giacomini  
David Heath  
Graeme Rankin

cc:  
Rick Dunn - w/o attachment  
Martin Wheeler - w/o attachment



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**ADMIN RECORD**  
IA -A-00053

Variance Request  
Kaiser-Hill Company, L.L.C.

**DIRECTIVE:** DOE ORDER 5632.1C  
**TITLE:** Protection and Control of Safeguards and security interests  
**ISSUE DATE:** September 7, 1994  
**TOPIC:** Storage of Attractiveness Level D Waste in the RFETS Property Protection Area

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**1.0 DATE OF REQUEST**

July 31, 1998

**2.0 REQUEST NUMBER**

Kaiser-Hill Request No. RFPK-DOE-5632.1C-VR-067  
OSS-RF-98-008

**3.0 ORDER CITATION**

DOE Order 5632.1C Chapter 2, Section 1, Parts d., e. and h.:

1. GENERAL. This chapter outlines requirements for the protection of Categories I through IV quantities of special nuclear material and Vital Equipment. The following requirements shall apply:
  - d. Factors, such as ease of separability, accessibility, and concealment; quantity, chemical form, isotopic composition, purity, and containment; portability; protection strategies; radioactivity and self-protecting features, shall be considered in determining physical protection systems for each category of special nuclear material.
  - e. When special nuclear material is classified because of its configuration or content, or because it is part of a classified item, it shall receive the physical protection required by the highest level of classification of the configuration, content, or item, or category of special nuclear material involved, whichever is greater.
  - h. Delay mechanisms shall be employed to prevent removal or unauthorized use of Category I and II quantities of special nuclear material. Delay mechanisms may include passive barriers (e.g., walls, ceilings, floors, windows, doors, security bars), activated barriers (e.g., sticky foam, pop-up barriers), and visual obscurants (e.g., cold smoke).

DOE Order 5632.1C Chapter 2, Section 6, Part a.

**6. CATEGORY II QUANTITIES OF SPECIAL NUCLEAR MATERIAL.**

- a. In Process. Material shall be used or stored only within a Protected Area. All such matter shall be under material surveillance procedures.

#### **4.0 IMPACTED ENTITY**

Rocky Flats Environmental Technology Site (RFETS)  
Master Facility Code: 3772

#### **5.0 DEVIATION JUSTIFICATION**

##### Deviation

Kaiser-Hill Company, L.L.C. (KH) requests a variance to the requirements in DOE Order 5632.1C, Chapter 2 PROTECTION OF SPECIAL NUCLEAR MATERIAL AND VITAL EQUIPMENT for storage of Category (CAT) II quantities of Attractiveness Level D (Level D) waste outside the Protected Area (PA) and within the Property Protection Area (PPA) in PPA Secure Waste (PSW) Facilities. This request is referred to as Phase II of a two phase process for deviation from the requirements for storage of greater than Category IV quantities of Special Nuclear Materials. The request for Phase I was submitted under separate cover on [DATE]. Specifically, in this Phase II request, K-H is requesting a variance which would allow a PPA facility, known as a PSW Facility, to store Level D waste in quantities potentially exceeding CAT III limits. The justification for such a deviation is based on the following controls and conditions being implemented in each PSW facility that will contain the Level D waste prior to initiation of storage operations:

- Storage of Level D waste in a PSW will be allowed in quantities bounded by the physical and authorization basis of the PSW facilities only. Each drum of waste shall contain less than 200 fissile gram equivalents (FGE) and each container shall contain less than or equal to 10% Pu by weight.
- Segregation from other waste with terminated safeguards.
- Routine Site security measures currently in place will remain in place.
- Physically secure access to the PSW facilities, or the portion of the PSW facility containing Level D waste, by controlling access for personnel and containerized waste through the use of administrative and/or automated (including key control) access controls to the Level D waste.
- Random inspections of the security of the PSW facility, or the portion of the PSW facility containing Level D waste, on an hourly basis during off-shifts to allow the site protective force to detect and respond to potential theft or diversion in a timely manner. If the Level D waste is in Pipe Overpack Component (POC) drums which two (or more) closure bolts on opposing sides of the POC have been altered to prevent dismantlement (referred to as

the pipe disabling upgrade), the nominal random inspection interval would decrease to two hours.

### Rationale

The rationale for requesting this variance is based on a recent *Vulnerability Assessment Report for Selected Plutonium-Bearing Residues*, an unclassified summary of which is attached (Attachment 1). The assessment refers to the conditions in this variance as “Phase II Operations” for RFETS Transfer Truck and Buildings 440/551/664 and includes the following constraints:

- access control at buildings or secured areas containing the Attractiveness Level D material consisting of a badge check and an access authorization or equivalent measure;
- hourly random patrol through the interior of buildings/areas containing the Attractiveness Level D material by an armed security police officer (SPO) with backup unless the pipe disabling upgrade is implemented which would allow the patrol frequency to double;
- segregated and secure storage for all Attractiveness Level D material.

Without this variance, RFETS residue stabilization for risk reduction and pre-disposal actions will be limited due to storage constraints within the PA and due to physical shipping constraints (i.e., no TRUPACT loading/shipping facility inside the PA). In addition, throughput to WIPP from RFETS would be dependent on about 500 to 1000 “just in time” deliveries per year from in the PA to the TRUPACT-II loading facilities in the PPA (Phase I Operations). Although this is theoretically feasible and is the basis for shipments in FY98 and FY99 to initiate residue disposal at WIPP, it is operationally improbable that throughput of greater than 5,000 drums (against projections of 10,000 to 15,000 drums) in any FY using Phase I alone could occur.

It is proposed that the controls and conditions described earlier in this section are equivalent to the conditions specified in the DOE Order requirements, and provide sufficient protection against any threat of diversion or theft of Attractiveness Level D waste.

Such controls will be implemented as described in Attachment 2 (*Plan to Allow Storage of Attractiveness Level D Waste in the Property Protection Area Secure Waste Facilities*).

## **6.0 PROTECTION MEASURES**

The following security measures are proposed pursuant to the credited measures in the referenced Vulnerability Assessment Report for Selected Plutonium-Bearing Residues for “Phase II Operations”

:

- Institute access control consisting of a badge check and an access authorization or equivalent measure at PSW facilities containing the

Attractiveness Level D waste. In the event only a portion of a facility is used for Attractiveness Level D waste and that it is practical, access control may be limited to only those portions of the facility containing Attractiveness Level D material.

- Hourly random patrols by an armed security police officer (SPO) through the interior of facilities containing the Attractiveness Level D waste unless the pipe disabling upgrade is implemented which would allow the random patrol frequency to be reduced to every 2 hours.
- All Attractiveness Level D material in PSW facilities will be segregated from other waste for which safeguards have already been terminated.
- All Attractiveness Level D material in PSW facilities will be secured to control access to the material and prevent unauthorized access.
- Material in transit from the PA to the PSW facilities will be managed to be less than 3 kg Pu. Material is considered to no longer be in transit when it has been physically removed from the transit vehicle and placed under control of the PSW facility.
- Routine Site security measures currently in place will remain in place
- The above controls will be in place and the implementation reviewed by the facility and appropriate security personnel prior to storage of Attractiveness Level D material in each PSW facility.

## **7.0 DURATION**

This variance is requested for the life of the RFETS closure project as long as the conditions of storage of Attractiveness Level D waste outside of the RFETS PA are in effect.

## **8.0 RISKS**

Risk computation and consequence of loss were calculated for Theft and Radiological Sabotage scenarios in the unclassified Vulnerability Assessment Report for Selected Plutonium-Bearing Residues (Attachment 1). The consequence values for Theft/Diversion and Radiological Sabotage along with the methodology used to calculate risk and rank as LOW, MODERATE, and HIGH are also in Attachment 1. Although much of the calculations are classified, the following conclusions are unclassified:

- The risk for the Theft/Diversion scenario at RFETS under Phase II is rated as LOW.
- The risk for the Radiological Sabotage scenario at RFETS under Phase II with the proposed controls discussed above is rated as LOW.

- Overall, the risk at RFETS for Phase I or Phase II operations was evaluated to be LOW.

## 9.0 APPROVALS

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date

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date

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PLAN TO ALLOW STORAGE OF  
ATTRACTIVENESS LEVEL D WASTE IN THE  
PROPERTY PROTECTION AREA SECURE  
WASTE FACILITIES

## **1. Introduction**

On April 2, 1998 the "PLAN FOR PREPARING PLUTONIUM BEARING RESIDUES FOR FINAL DISPOSITION AS TRU/TRU-MIXED WASTE" was submitted to DOE RFFO including Variance Request No. RFPK-DOE-5633.3B-VR-062 for Safeguards Termination of Attractiveness Level D (Level D) waste. It outlines a disposal pathway for Level D transuranic and transuranic mixed wastes (TRU) derived from Residues. In that plan, TRU Residues with Level D would be campaigned from the point of origin in the Protected Area (PA) at RFETS to segregation in B664 or B440 in the PPA at RFETS in quantities not to exceed Category (CAT) IV levels. The waste would be loaded into a TRUPACT-II vessel and sealed. Safeguards would be terminated on the waste when the TRUPACT-II vessel is sealed. Under that plan, at no time would the quantity of Level D waste outside of the PA (not in a TRUPACT-II) exceed 3 kg Pu. That variance request (VR-062) has been termed Phase I of a 2 phased approach for termination of safeguards on select residue wastes.

Phase II of the approach, when approved, allows for storage of Level D waste in certain facilities within Property Protection Area (PPA) contingent upon the addition of compensatory measures to protect the waste in storage and to minimize the risk of theft, diversion, or radiological sabotage. This current plan (referred to as the Phase II Plan) and variance request (RFPK-DOE-5632.1C-VR-067, "Storage of Attractiveness Level D Waste in the RFETS Property Protection Area.") proposes that CAT II quantities of Level D waste (in excess of 16 kg Pu) be stored in facilities outside the PA. In addition to the new controls proposed (as described below), this plan also has as a basis the consideration that routine Site security measures will remain in place. Specifically, this plan proposes a variance which would allow a PPA facility with the following controls, known as a PPA Secure Waste (PSW) Facility, to store Level D waste in quantities potentially exceeding CAT III limits:

- Storage of Level D waste in a PSW will be allowed in quantities bounded by the physical and authorization basis of the PSW facilities only. Each drum of waste shall contain less than 200 fissile gram equivalents (FGE) and each container shall contain less than or equal to 10% Pu by weight.
- Segregation from other waste with terminated safeguards.
- Routine Site security measures currently in place will remain in place.
- Physically secure access to the PSW facilities, or the portion of the PSW facility containing Level D waste, by controlling access for personnel and containerized waste through the use of administrative and/or automated (including key control) access controls to the Level D waste.
- Random inspections of the security of the PSW facility, or the portion of the PSW facility containing Level D waste, on an hourly basis during off-shifts to

allow the site protective force to detect and respond to potential theft or diversion in a timely manner. If the Level D waste is in Pipe Overpack Component (POC) drums which two (or more) closure bolts on opposing sides of the POC have been altered to prevent dismantlement (referred to as the pipe disabling upgrade), the nominal random inspection interval would decrease to two hours.

A Vulnerability Assessment (VA) was done on the five components of transport as waste is moved from the Protected Area to entombment underground at the WIPP site (see unclassified summary as Attachment 1 to the variance request). The components are: 1) onsite transport from the PA to the PPA; 2) loading, staging or storage in the PPA; 3) transport to WIPP via TRUPACT-II; 4) above-ground storage at WIPP; and, 5) storage at depth at WIPP. The VA refers to the operating conditions using this requested variance as "Phase II Operations". Using waste with the highest risk rating, as determined by Item Description Code (IDC), a minimum of 3 kg Pu are needed to create an unacceptable situation. This plan is designed to preclude having more than 3 kg Pu of Level D waste in transit in the PPA (not in a PSW facility or a sealed TRUPACT-II) and to assure that an unauthorized removal of 3 kg Pu cannot be accomplished without detection and prevention. Additionally, the VA concludes that the risk of storage of residue waste in excess of CAT III limits is LOW. As a result, storage of Level D waste outside the PA in certain PSW facilities could be authorized.

Approval of this plan will allow RFETS to evacuate and reduce the area of the PA in agreement with the current site closure plan, expedite shipments of TRU waste to the Waste Isolation Pilot Plant (WIPP) for disposal, and hold Level D waste in safe and secure interim storage.

## **2. Background**

A large portion of the Residues in storage at RFETS will be repackaged, blended, or processed and transported for disposal at the WIPP site in New Mexico. Most of the residue waste generated will be Attractiveness Level D with the remainder generated at Level E. The exact volume to be disposed of at WIPP is under discussion and continues to change due to packaging variations, processing out-feed projections, and changes in the recovery thresholds for Residues. The current generation estimates reflect quantities of approximately 25,000 drums or 5,000 cubic meters of Level D waste.

Assuming a loading efficiency rate of about 75% due to WIPP Waste Acceptance Criteria (WAC) wattage and weight limits, each 14-drum TRUPACT-II vessel will average 10.5 drums of actual waste (and 3.5 dunnage or empty drums). Applied to the projected Level D waste under the current plan, this represents over 2,300 on demand or "just in time" deliveries from inside the PA. While RFETS could theoretically execute this type of "just in time" plan if needed, there are several points of potential failure for each delivery which will result in a significant decrease in the efficiency of disposal operations and could impact the timing of the site closure plan.

In addition, there is insufficient storage capacity in the PA to accommodate the Level D waste at the levels needed to support the site closure plan. Sufficient storage exists or can be acquired in the PPA, but this is of little use unless this variance is approved. The alternative to the variance is immediate new construction and/or retrofit of multiple facilities in the PA.

In short, the purpose of the original Phase I plan was to make disposal of RFETS Level D TRU waste at WIPP possible by termination of safeguards at the TRUPACT-II vessel in the PPA. The purpose of this plan is to achieve even greater efficiency to allow RFETS to succeed at closure of the site in accordance with the current site closure plan with no additional risk by allowing storage of Level D waste in PPA Secure Waste (PSW) Facilities.

### **3. Implementation of Proposed Variance**

In order to gain approval for the storage of Level D waste outside the PA in PSW facilities, the following security measures shall be implemented prior to the initiation of storage operations involving Level D waste:

1. Institute access control consisting of a badge check and an access authorization or equivalent measure at PSW facilities containing the Attractiveness Level D waste. In the event only a portion of a facility is used for Attractiveness Level D waste and that it is practical, access control may be limited to only those portions of the facility containing Attractiveness Level D material. Access authorization will be granted by a "Q" cleared facility manager (or designee) and access control will be administered by a PSAP qualified individual. These measures are applicable only during hours of occupation of the facility (i.e., normal shift hours). During hours in which the facility is not occupied, it will be locked in accordance with existing Site practices.
2. Hourly random patrols by an armed security police officer (SPO) through the interior of facilities containing the Attractiveness Level D waste unless the pipe disabling upgrade is implemented which would allow the random patrol frequency to be reduced to every 2 hours. These measures are applicable only during hours in which the facility is not occupied (i.e., during off-shift hours).
3. All Attractiveness Level D waste in PSW facilities will be segregated from other wastes for which safeguards have already been terminated.
4. All Attractiveness Level D waste in PSW facilities will be secured to control access to the material and prevent unauthorized access.
5. Material in transit from the PA to the PSW facilities will be managed to be less than 3 kg Pu. Material is considered to no longer be in transit when it has been

physically removed from the transit vehicle and placed under control of the PSW facility.

6. Routine Site security measures currently in place will remain in place
7. The above controls will be in place and the implementation reviewed by the facility and appropriate security personnel prior to storage of Attractiveness Level D material in each PSW facility.

Specific facilities targeted for conversion to PSW facilities include: Building 664, Building 440, and Building 551 (following completion of conversion from a distribution warehouse to a waste storage facility).

In each case, the proposed controls will be implemented by the facilities (access control, material management, and waste segregation/security) and WSI (SPO patrols) prior to storage of quantities exceeding CAT III quantities of Level D waste.

The physical security upgrades are planned and budgeted as an activity beginning in FY '99 and are planned for completion by the third quarter of FY '99 to support the projected need date for storage of Level D waste outside the PA.

Regarding the administrative controls, Kaiser-Hill will implement and administer a system to control movement of the Level D material out of the PA such that no more than 3 kg Pu is in transit at any given time. The site-wide movement of Level D material out of the PA will be managed as part of the additional controls for Building 440, Building 664, and/or Building 551.

Regarding the pipe disabling upgrade, this option will be implemented through the use of an epoxy adhesive applied to the both threads, on two bolts, on opposing sides of the pipe closure. Bolt disabling will likely not occur until just prior to shipment due to the possible, but unlikely, event that one or more POCs would have to be reworked.

The controls will be considered implemented upon completion of the physical upgrades and upon incorporation of the administrative controls into applicable operating procedures. This will be followed by an assessment of the PSW facility upgrades and the material movement control by the facility, KH Security, and WSI. Each facility must be reviewed prior to allowing Level D storage in that facility.

Appendix A provides a summary matrix for implementation of the proposed action.

**APPENDIX A – PHASE II SAFEGUARDS TERMINATION IMPLEMENTATION  
MATRIX**

CONTROL / REQUIREMENT	ACHIEVABILITY/ WORKABILITY	CLARIFICATION OF EXACT CONTROL TO BE IMPLEMENTED	RESPONSIBILITY PARTY FOR IMPLEMENTATION	RESPONSIBILITY PARTY FOR MAINTENANCE ONCE IMPLEMENTED	RESPONSIBILITY PARTY FOR FUNDING OF IMPLEMENTATION
<p>1. Institute access control consisting of a badge check and an access authorization or equivalent measure at PSW facilities containing the Attractiveness Level D waste. In the event only a portion of a facility is used for Attractiveness Level D waste and that it is practical, access control may be limited to only those portions of the facility containing Attractiveness Level D material. Access authorization will be granted by a "Q" cleared facility manager (or designee) and access control will be administered by a PSAP qualified individual. These measures are applicable only during hours of occupation of the facility (i.e., normal shift hours). During hours in which the facility is not occupied, it will be locked in accordance with existing Site practices.</p>	<p>While this is achievable it is an administrative control subject to failures. Such failures will not be considered security infractions by the facility operations but will be corrected upon discovery.</p> <p>Also SOE rounds are performed shiftily in these areas.</p>	<p>Controlling egress paths for personnel will be accomplished by automated personnel access controls consisting of a locked doors into each of the TRUPACT II loading portions of each facility.</p> <p>Controlling egress paths for containerized waste will consist of procedurized administrative controls directing waste container movements around Level D wastes.</p> <p>Both the Building 664 Hi-Bay and Building 440 Rail Car bay will have locks installed on all doors and administrative control used to lock these doors whenever the buildings are unattended. Control of keys for these locks will be administrative.</p> <p>A full time employee will administer this program with two existing facility personnel PSAP qualified as a backup.</p>	<p>RMRS Solid Waste Operations</p>	<p>RMRS Solid Waste Operations</p> <p>Note that based upon projected personnel turnover one new person will have to be PSAP qualified per year.</p>	<p>RMRS Solid Waste Operations</p>

CONTROL / REQUIREMENT	ACHIEVABILITY/ WORKABILITY	CLARIFICATION OF EXACT CONTROL TO BE IMPLEMENTED	RESPONSIBILITY PARTY FOR IMPLEMENTATION	RESPONSIBILITY PARTY FOR MAINTENANCE ONCE IMPLEMENTED	RESPONSIBILITY PARTY FOR FUNDING OF IMPLEMENTATION
<p>2. Hourly random patrols by an armed security police officer (SPO) through the interior of facilities containing the Attractiveness Level D waste unless the pipe disabling upgrade is implemented which would allow the random patrol frequency to be reduced to every 2 hours. These measures are applicable only during hours in which the facility is not occupied (i.e., during off-shift hours).</p>	<p>Yes.</p>	<p>Building management will develop a procedure for notifying WSI when the building is being vacated and reoccupied.  (NEED WSI PROC. REFERENCE)</p>	<p>RMRS Solid Waste Operations. It will be possible to establish an administrative control to notify WSI.  WSI will be responsible for conducting the inspections and re-locking the facility.</p>	<p>RMRS Solid Waste Operations  WSI</p>	<p>RMRS Solid Waste Operations  WSI</p>
<p>3. All Attractiveness Level D waste in PSW facilities will be segregated from other wastes for which safeguards have already been terminated.</p>	<p>While this is achievable it is an administrative control subject to failures. Such failures will not be considered security infractions by the facility operations but will be corrected upon discovery.  It must be noted that based upon WJPP shipping schedule other types of wastes will be present in the areas of TRUPACT II loading. These areas can not be exclusively set aside for level D material.</p>	<p>The Building 664 segregation and storage of Level D waste will be accomplished by administrative controls (procedure) that will require that 1) these wastes be kept in the Hi-Bay and 2) that other wastes in the Hi-Bay be separated administratively.  The Building 440 Segregation and storage of Level D waste will be accomplished by administrative controls (procedure) that will require that 1) these wastes be kept in the Rail Car Bay and 2) that other wastes in the Rail Car Bay be separated administratively.</p>	<p>RMRS Solid Waste Operations</p>	<p>RMRS Solid Waste Operations</p>	<p>RMRS Solid Waste Operations</p>

CONTROL / REQUIREMENT	ACHIEVABILITY/ WORKABILITY	CLARIFICATION OF EXACT CONTROL TO BE IMPLEMENTED	RESPONSIBILITY PARTY FOR IMPLEMENTATION	RESPONSIBILITY PARTY FOR MAINTENANCE ONCE IMPLEMENTED	RESPONSIBILITY PARTY FOR FUNDING OF IMPLEMENTATION
4. All Attractiveness Level D waste in PSW facilities will be secured to control access to the material and prevent unauthorized access.	see items 1 & 3 above				
5. Material in transit from the PA to the PSW facilities will be managed to be less than 3 kg Pu. Material is considered to no longer be in transit when it has been physically removed from the transit vehicle and placed under control of the PSW facility.	The VA states under the theft scenario that "During Phase I operations, the maximum quantity of Pu contained in Attractiveness level D material located outside of the PA and outside of TRUPACT IIs would be less than 3 kg. This control only controls material in transit and doesn't address material being held in 440 or 664 awaiting placement into the TRUPACT II.	NMC Maybe if implemented via procedure 1-PRO-015-NMT-003, Transferring Category III and IV Material. However if there are ever two or more trucks being used to transport at the same time it will be difficult procedures.  <i>(NEED REF. AND WHO IS RESPONSIBLE FOR CONTROL)</i>	SSOC	SSOC	SSOC
6. Routine Site security measures currently in place will remain in place	No new activity required.	<i>(NEED REF.)</i>			
7. Kaiser-Hill will implement and administer a system to control movement of the Level D material out of the PA such that no more than 3 kg Pu is in transit at any given time. The site-wide movement of Level D material out of the PA will be managed as part of the additional controls for Building 440, Building 664, and/or Building 551.	see item 5. above.				

CONTROL / REQUIREMENT	ACHIEVABILITY/ WORKABILITY	CLARIFICATION OF EXACT CONTROL TO BE IMPLEMENTED	RESPONSIBILITY PARTY FOR IMPLEMENTATION	RESPONSIBILITY PARTY FOR MAINTENANCE ONCE IMPLEMENTED	RESPONSIBILITY PARTY FOR FUNDING OF IMPLEMENTATION
<p>8. Regarding the pipe disabling upgrade, this option will be implemented through the use of an epoxy adhesive applied to the both threads, on two bolts, on opposing sides of the pipe closure. Bolt disabling will likely not occur until just prior to shipment due to the possible, but unlikely, event that one or more POCs would have to be reworked.</p>	<p>Yes.</p>	<p>procedures to be developed</p>			
<p>9. The controls will be considered implemented upon completion of the physical upgrades and upon incorporation of the administrative controls into applicable operating procedures. This will be followed by an assessment of the PSW facility upgrades and the material movement control by the facility, KH Security, and WSI. Each facility must be reviewed prior to allowing Level D storage in that facility.</p>	<p>Yes.</p>	<p>It will likely be a combination of modification to procedure 1-PRO-015-NMT-003, Transferring Category III and IV Material and work instructions in each facility. Physical/administrative controls will be verified through receipt of beneficial occupancy (in the case of physical mods.) and through Management Assessment(s) prior to operation.</p>	<p>RMRS Solid Waste Operations</p>	<p>RMRS Solid Waste Operations</p>	<p>RMRS Solid Waste Operations</p>
<p>10. Safeguards will be terminated on the waste when the TRUPACT II vessel is sealed.</p>	<p>Yes</p>	<p>(NEED REF.) Need clarification on process/procedure if TRUPACT needs to be reopened. Also need clarification on MAA reqs.</p>	<p>SSOC Residue Program.</p>	<p>SSOC Residue Program.</p>	<p>SSOC Residue Program.</p>