

Rocky Flats Environmental Technology Site

ADMINISTRATIVE PROCEDURE

1-PRO-079-WGI-001

REVISION 3

WASTE CHARACTERIZATION, GENERATION, AND PACKAGING

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K-H Waste Management Print Name Date

Responsible Organization: Customer Service Organization

Effective Date: 12/21/00

CONCURRENCE BY THE FOLLOWING DISCIPLINES IS DOCUMENTED IN THE PROCEDURE HISTORY FILE:

Traffic Management
TRU Waste Projects
LLW Waste Projects
Quality Assurance
EHS&Q

Building 371/374 Closure Project
Building 707 Closure Projects
Building 771 Closure Projects

Waste Certification & Oversight
Nuclear Safety
Criticality Safety
RISS
Independent Oversight
Building 776/777 Closure Projects
Material Stewardship

This procedure is available at a known location.

ISR#: SISR001-05

SES#: SES-RFP-01.0394-ARS

Reviewed for Classification/UCNI

By: W. Deane

Date: 19 DEC 00 (LAW)

This procedure superseded procedure 1-PRO-079-WGI-001, Revision 2

Periodic review frequency: 4 years from the effective date

PADC-1999-01213

CONTROLLED DOCUMENT

(# numbered in red ink black numbering
indicates information only copy)

234

Copy Number

ADMIN RECORD

1/40

SW-A-006006

LIST OF EFFECTIVE PAGES

<u>Pages</u>	<u>Effective Date</u>
1 – 25	12/21/00

The following Document Change Forms (DCFs) are active for this document:

None

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1.0 PURPOSE

The purpose of this procedure is to describe the waste generation process at the Rocky Flats Environmental Technology Site (the Site). This procedure relates to other site level procedures in that it presents an outline-level description of the process by which waste is to be characterized, generated, and packaged at the Site. This procedure specifically refers the Waste Generator to the Customer Service Organization (CSO) and appropriate Waste Generating Instructions (WGIs), which are compilations of site-level procedures, off-site disposal facility Waste Acceptance Criteria (WAC), state and federal regulations, Department of Energy (DOE) orders, and Site agreements. Refer to Appendix 1 for an example WGI.

Prior to issuance of this procedure, the Site required Waste Generators to glean waste packaging requirements from a myriad of site-level documents (e.g., 4-D99-WO-1100, *Solid Radioactive Waste Packaging Procedure*; 1-M12-WO-4034, *Solid Radioactive Waste Packaging Requirements Manual*). This procedure sanctions the CSO to determine appropriate packaging requirements for the Waste Generator and communicate information to floor level personnel via the WGI.

2.0 SCOPE

This procedure is applicable to "newly-generated" waste, which, for the purposes of this procedure, is defined as waste packaged or repackaged on or after November 3, 1997. This procedure applies to all types of packaged waste EXCEPT routine sanitary waste as defined in 1-PRO-573-SWODP, *Sanitary Waste Offsite Disposal Procedure* and Tank II database waste, and applies to all individuals who have a role in the characterization, generation, and packaging of waste at the Site. All other proposed sanitary waste generation activities will be evaluated by the Customer Service Representative(s) (CSRs) and Sanitary Waste Programs personnel to determine the need for a WGI. Waste destined for on-site or off-site treatment (i.e., waste that is not in its final form) may not require the development of a WGI. Such waste will be handled on a case-by-case basis. Pre-WGI waste (i.e., waste packages initiated on or before November 3, 1997), will not be included under the requirements of this procedure. Refer to MAN-955-099, *Customer Service Organization Operations Manual*.

3.0 RESPONSIBILITIES

3.1 Customer Service Organization (CSO)

The responsibilities of the CSO as listed below include providing guidance and assistance to the Waste Characterization Subject Matter Expert (SME) and the Waste Generators in the areas of characterization, segregation, generation, and packaging of waste. Specifically, this involves the following services:

- Coordinating the waste management activities of the assigned waste generating project(s) from the project design phase through the packaging phase.
- Integrating Waste Generator and Waste Management Organization activities by serving as a point of contact and source of subject matter expertise for waste management at the Site.
- Providing Site guidance, and assistance to line management to facilitate implementation of waste management, storage, and disposal policies, procedures, and instructions.
- Establishing and implementing strategic plans for long-term improvements in waste management and functional process operations.
- Obtaining the necessary information from Waste Characterization SMEs to prepare WGIs. This may include "walking down" the waste-generating project with appropriate personnel and assisting with waste characterization and waste destination determinations.
- Interfacing with the Waste Generator during the waste generation process.

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3.1 Customer Service Organization (CSO) General Responsibilities (continued)

- Verifying the acceptability of waste packages and associated documentation in accordance with the requirements specified in the applicable WGI.
- Verifying that Waste and Environmental Management System (WEMS) is current at the point when waste is accepted into the Site waste management system.
- Assisting, as necessary, with preparation of the package paperwork for the initial waste transfer and at the request of the Waste Generator for subsequent transfers (e.g., from the generating-facility dock to the first transfer destination).
- Verifying that packages specified on the Nuclear Material and Drum Transfer Report (NMDTR), Internal Transfer Report (ITR) or Appendix 6, PRO-1015-S&ATS-1.0, 750/904 PADS Surveillance and Administrative Tracking System, have been verified by a member of the CSO prior to transfer of package(s).
- Ensuring that all records, databases, and files associated with the CSO are maintained for quality assurance purposes.
- Approving requests for commodities (e.g., empty waste packagings).
- Maintaining the WGI templates and Addenda to ensure that change-control is in effect. (Refer to MAN-955-099, *Customer Service Organization Operations Manual*, for additional information).
- Ensuring that records associated with WGI revisions are maintained in accordance with document control requirements, as specified in MAN-955-099, *Customer Service Organization Operations Manual*.
- Coordinating WGI closeout and records management activities, in accordance with MAN-955-099, *Customer Service Organization Operations Manual*.
- Communicating technical changes to CSO-controlled procedures or documents (e.g., 4-D99-WO-1100, 1-M12-WO-4034) to waste program support organizations impacted by the Waste Management process.
- Maintaining training in accordance with 1-M12-WO-4034, Section 2.2, *Solid Radioactive Waste Packaging Requirements Manual*.

3.2 Customer Service Representative (CSR)

The CSR is responsible for preparing WGIs that specify the requirements for Waste Generators to generate disposal-compliant waste, transfer compliant packaging with on-Site compliant labeling and marking per MAN-T91-STSM-001, *Site Transportation Safety Manual*.

3.3 CSO Procedure Specialist

The CSO Procedure Specialist(s) is responsible for providing technical and administrative support to maintain waste management procedures. Specific responsibilities include:

- Serving as SME for waste packaging requirements documents and procedures.
- Revising waste management procedures, when appropriate, as a result of Site procedure changes and/or changes to disposal-facility requirements/criteria.
- Supporting the development of Operations Orders, Standing Orders, and Shift Orders for those operations impacted by Waste Management Operations.
- Ensuring that accurate records are maintained for all procedure modifications initiated by the CSO.
- Ensuring consistency between, and the technical accuracy of Site-level and waste management procedures and requirements documents.

3.4 Material Transportation Coordinator

Responsibilities include coordinating the scheduling of on-site material moves, and developing and distributing the integrated Site material daily and weekly schedules.

3.5 Nondestructive Assay (NDA)

Operate NDA system and receive radioactive waste, except Surface Contaminated Object (SCO) waste and waste characterized using another approved method.

3.6 Solid Waste Operations Receiving Facility

Responsibilities include receiving waste packages, ensuring that "newly-generated" waste has been CSO verified and ensuring that facility's Authorization Basis (AB) will be met prior to receiving the waste packages.

3.7 Transfer/Shipping Facility

In this document Transfer/Shipping Facility is a general name for the building in which the waste is being sent from.

3.8 Transportation Operations

Responsibilities include providing transportation services for on-site material transfers or off-site shipments.

For the purposes of this procedure Transportation Operations refers to personnel involved in on-site movements of waste packages only.

3.9 Waste Characterization SME or Designee

Responsibilities include characterizing waste and providing the waste characterization information to the CSO prior to preparation of WGIs, as well as complying with all requirements of the WGIs and this procedure during waste packaging. Specific responsibilities include:

- Ensuring that a properly characterized waste stream exists as an approved Non-routine Waste Origination Log (NRWOL) or in the Building Waste Stream and Residue Identification and Characterization (WSRIC) Book or Backlog Waste Reassessment Baseline Book (BWRBB).
- Distributing the WGI for review and concurrence to the Criticality Safety Organization (review and concurrence with the WGI by this organization is only required for Transuranic/Transuranic Mixed [TRU/TRUM] waste). Refer to MAN-955-099, *Customer Service Organization Operations Manual*.
- Distributing the WGI for review and concurrence to the Independent Safety Review (ISR) and /or Nuclear Safety, as required.
- Maintaining a Building Book containing all active WGIs for waste packaged for responsible projects/buildings.
- Distributing the applicable, approved WGI to Waste Generator Supervisors before waste generating activities are initiated.

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3.10 Waste Generator

Responsibilities include complying with all requirements of the WGIs and this procedure during waste packaging. Specific responsibilities include:

- Segregating generated waste in accordance with the requirements of 1-M12-WO-4034, *Solid Radioactive Waste Packaging Requirements Manual*.
- Generating properly categorized and characterized waste.
- Conducting waste generating and packaging operations in accordance with an approved WGI.
- Initiating the Waste/Residue Traveler (W/RT).
- Ceasing waste generation activities and notifying supervision and/or the CSR if the waste being generated is not consistent with the waste anticipated (i.e., as specified in the WGI).
- Maintaining training in accordance with 1-M12-WO-4034, *Solid Radioactive Waste Packaging Requirements Manual*.

3.11 Waste Generator Supervisor

Responsibilities include complying with all requirements of the WGIs and this procedure during waste packaging. Specific responsibilities include:

- Ensuring that Waste Generators have an approved WGI prior to initiating waste packaging activities.
- Ensuring that the WEMS Waste Package Worksheet is completed and submitted for WEMS update.
- Resolving any package discrepancies regarding Waste Inspection and/or Waste Verification.

3.12 Waste Inspector

Responsibilities include performing inspections of packaged waste materials throughout the waste generating process and at quality control hold points or as deemed necessary to monitor and verify compliance as defined in PRO-1045-WI-001, *Solid Radioactive Waste Inspection*.

3.13 WEMS Coordinator

Responsibilities include providing data-entry and retrieval services, as required, to support waste generation and disposition. Specific responsibilities include:

- Updating the WEMS database to reflect the current configuration and location of waste packagings and packages that have been labeled with WEMS Bar Code Numbers in accordance with 1-PRO-Q11-WO-1221, *Controls for Updating Waste Package Information in WEMS*.
- Obtaining required data for data entry from Waste Characterization SMEs and Waste Generators.
- Entering the data into WEMS.
- Providing accuracy checks of the data in accordance with applicable waste management procedures.
- Providing waste inventory and specialized reports as requested by Waste Generators and management personnel.
- Addressing WEMS data issues with respect to data accuracy.
- Maintaining quality records of WEMS activity.

3.14 551 Warehouse

Responsibilities include ordering and inspecting empty waste packagings and issuing the packagings to Waste Generators when authorized by the CSO.

4.0 WASTE CHARACTERIZATION, GENERATION, AND PACKAGING INSTRUCTIONS**4.1 Waste Characterization****Waste Characterization SME or Designee**

- [1] Contact the CSO to explain the intended waste generating activity, AND schedule an appointment to "walk-down", as necessary, the project with a member of the CSO.
- [2] Submit WSRIC, NRWOL, and/or BWRBB process numbers to the CSO for review and preparation of the WGI for the waste(s) to be generated. The Waste Characterization SME is ultimately responsible for the characterization of the waste.

CSO and Waste Characterization SME

- [3] "Walk down" the project with appropriate personnel (e.g., Engineering, Safety, Radiological Safety, Waste Supervision, etc.), at the discretion of the Waste Characterization SME and/or CSO. The objective of the "walk down" is to obtain as much information as possible about the waste to be generated prior to generation of waste. Refer to MAN-955-099, *Customer Service Organization Operations Manual*.
 - [A] Collect waste generation information from the Waste Characterization SME, such as intended dates of generation, estimated quantities of each waste type to be generated, and process number(s) (e.g., WSRIC, NRWOL, or BWRBB information). Waste characterization activities are governed by 95-QAPjP-0050, *RFETS TRU Waste Characterization Program Quality Assurance Project Plan (QAPjP)*, and 1-MAN-036-EWQA, Section 1.6.1, *Waste Characterization Program Manual*.
 - [B] Review the characterization information.

IF the characterization rationale is not adequate or there is no WSRIC, NRWOL or BWRBB information available for the waste stream, THEN contact Waste Systems and characterize the waste in accordance with 4-H19-WSRIC-001, *WSRIC Characterization and Reverification*, or 1-I34-WO-1103-NRWOL, *Non-Routine Waste Origination Log Instructions*.

Waste Characterization SME

- [4] Arrange, as necessary, for any analyses that may have been identified in Step 4.1[3][B] above AND forward a copy of the results to the CSO.

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4.2 Waste Generation Preparation

CSR or Designee

- [1] Following characterization, propose a potential final disposal site for the waste to be generated and prepare or coordinate preparation of the WGI(s) or revisions, in accordance with MAN-955-099, *Customer Service Organization Operations Manual*.

NOTE: *The WGI enables the Waste Generator to generate and package disposal-compliant waste. Procedure MAN-955-099 is a Site administrative guidance procedure. All WGIs are prepared using this guidance document and are based on existing Site-Level Technical Procedures and documents (e.g., WO-1100, WO-4034) or other technical information (e.g., Department of Transportation [DOT] regulations) that serve as source documents for the technical-content of the WGIs. See Appendix 1 for an example of a typical WGI.*

NOTE: *It may be necessary to generate more than one WSRIC Waste Stream for the same waste output (i.e., Low Level Waste [LLW], TRU, Hazardous, Non-Hazardous, etc.) so that all needed WGIs can be produced.*

- [2] Sign the WGI.
- [3] Forward the signed WGI to the Waste Characterization SME for acknowledgement and concurrence signature.

NOTE: *Waste Characterization SME Training requirements and responsibilities are specified in 94-RWP/EWQA-0014, Low-Level/Low-Level Mixed Waste Management Plan; and PLN-97-007, TRU Waste Characterization Program Training Implementation Plan.*

Waste Characterization SME

- [4] Upon receipt of a CSR-signed WGI:
- [A] Review the terms and conditions specified in the WGI AND sign in the block titled Generator Acknowledgement ONLY if qualified as a Waste Characterization SME.

Waste Characterization SME or Designee

- [B] IF a WGI deviates from a document that has been reviewed and approved by ISR and/or Nuclear Safety, THEN ensure that the WGI is reviewed and approved by ISR and/or Nuclear Safety. (For example, a deviation from 4-D99-WO-1100 and/or 1-M12-WO-4034 requires review by both ISR and Nuclear Safety).
- [C] IF the WGI is for TRU/TRU-Mixed waste, THEN distribute the WGI to Criticality Safety for review concurrence. Concurrence SHALL be documented by signature in the Concurrence Block of the WGI by authorized personnel in this organization.
- [D] Return the signed original WGI to the CSR or designee.

CSR or Designee

- [E] Retain a copy of the signed WGI
- [F] Stamp the retained copy of the WGI with "Master Copy" in red ink AND place it in the applicable Building/Project Book.
- [G] Insert a WEMS generated WGI Summary Report into the Building/Project Book. The report is a listing of all active WGIs with current dates.
- [H] Store and archive the original WGI in accordance with the requirements of Section 9.0, *Records Processing*.

4.2 Waste Generation Preparation (continued)

Waste Characterization SME or Designee

- [I] Maintain a Building/Project Book of all active WGIs.

Waste Generator

- [J] Obtain an approved WGI before generating activities are initiated.
- [K] Submit a Material & Supply (M&S) Requisition card to the CSO for the waste packagings specified on the WGI, and obtain the CSO approval/signature.

CSR or Designee

- [5] IF the request for empty packagings corresponds with the type and quantity of packages specified on the applicable WGI, THEN approve the M&S Requisition by signing the card.

551 Warehouse

- [6] Verify that a member of the CSO approved the package request.
- [7] Process the package request AND issue the requested quantity and type of packages and packaging materials to the designated Waste Generator.

Waste Generator

- [8] Receive the empty waste packaging into the facility AND then store as specified in 1-M12-WO-4034, *Solid Radioactive Waste Packaging Requirements Manual* or PRO-496-WO-LLWP, *Outdoor Storage/Staging of LL & LLM Waste Packages and Packaging*, and facility-specific requirements.
- [9] IF packaging emergency-response generated waste (i.e., waste generated from an unplanned, significant event or condition that requires time-urgent response from outside the immediate facility or area of the incident that could affect worker safety, public safety and/or the environment), THEN proceed to Section 4.4.
- [10] Ensure that WEMS is updated, as necessary, throughout the waste packaging process per 1-PRO-Q11-WO-1221, *Controls for Updating Waste Package Information in WEMS*.

NOTE: 100% In-Process or Dock Inspections are required for all radioactive waste, in accordance with PRO-1045-WI-001.

- [11] IF the WGI does not specify that 100% In-Process Waste Inspection is required, THEN proceed to Section 4.3 [2].
- [12] IF the WGI does specify that 100% In-Process Waste Inspection is required, THEN ensure that a Waste Inspector is present during packaging.

4.3 Waste Generation and Packaging

Waste Inspector

- [1] Perform 100% In-Process Waste Inspection throughout the packaging evolution, in accordance with PRO-1045-WI-001, *Solid Radioactive Waste Inspection*.

Waste Generator

- [2] At the Waste Inspectors request, open the waste items for content verification.
 - [A] IF opening the item could result in a violation of Site As Low As Reasonably Achievable (ALARA) requirements, THEN suspend the Inspection pending Inspection Management direction.

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4.3 Waste Generation and Packaging (continued)

- [3] Generate and package the waste, and close the waste package in accordance with the instructions in the WGI.
- [4] The following are to be performed concurrently and throughout the packaging evolution.
 - [A] IF unexpected wastes are generated OR IF unexpected conditions occur during waste generation/packaging that would warrant a change to the WGI, THEN contact the CSR or designee AND cease waste generation/packaging activities.
 - [B] Discrepancies identified during waste package filling SHALL be resolved prior to waste package closure, as described in the WGI.
 - [C] Ensure that the appropriate sections of the WRT are completed in accordance with 1-C80-WO1102-WRT, *Waste/Residue Traveler Instructions*.
- [5] IF NOT packaging emergency-response waste, THEN go to Section 5.0.

4.4 Emergency Response Waste Handling

Waste Characterization SME/Waste Generator

NOTE: *Waste generated from an emergency-response action may not require a new waste stream or WGI, at the discretion of the CSO.*

- [1] IF the waste is generated from an emergency-response, THEN a WGI SHALL be requested from the CSO within one working day following emergency packaging activities.

CSO

- [2] Collect waste generation and characterization information from the Waste Characterization SME.
 - [A] Determine if a WGI is required.
 - [B] IF a WGI is required, THEN return to Section 4.1 and complete steps as applicable and Section 4.2 complete steps as applicable, THEN go to Section 5.0.

5.0 DOCK INSPECTION AND VERIFICATION INSTRUCTIONS

Waste Generator

- [1] IF any of the following conditions exist, THEN go to Step [4] of this Section.
 - [A] The waste is not radioactive.
 - [B] The waste package is radioactive AND has been In-Process Waste Inspected per PRO-1045-WI-001, *Solid Radioactive Waste Inspection*, AND the WGI does not require assay.
 - [C] The waste package is radioactive, AND the waste package has not been In-Process Inspected, AND the WGI specifies that the waste package DOES NOT require Assay (i.e., Pipe Overpack Component [POC], dimensional limitation) in a drum or box counter.

5.0 DOCK INSPECTION AND VERIFICATION INSTRUCTIONS (continued)

- [2] IF the WGI specifies that the waste package requires Assay in a drum or crate counter (e.g., Passive/Active Drum Counter [PADC], Passive/Active Crate Counter [PACC], the Segmented Gamma Scanner [SGS]), THEN
- [A] Ensure that the WGI to which the waste was packed is available for the Waste Inspector and the CSO prior to inspection and verification activities.
- [B] Ensure that the waste package is Pre-Counter Dock Inspected by Waste Inspection and verified by the CSO prior to transferring the waste package to Assay.

Waste Inspection

- [3] Perform a Pre-Counter Dock Inspection in accordance with PRO-1045-WI-001, *Solid Radioactive Waste Inspection*.

Waste Generator Supervisor

- [4] Ensure that the appropriate sections of the W/RT are completed in accordance with 1-C80-WO1102-WRT, *Waste/Residue Traveler Instructions*, AND that a WEMS Waste Package Worksheet is completed and submitted for WEMS update.
- [5] IF the Waste Inspection results are unsatisfactory, THEN resolve the discrepancy(ies) regarding the package(s) by either of the following approaches:
- [A] IF the discrepancy(ies) can be resolved upon identifying the issue, THEN resolve the discrepancy(ies) and document the resolution in the Comments Section of the W/RT in accordance with 1-C80-WO1102-WRT, *Waste/Residue Traveler Instructions*.
- [B] IF the discrepancy(ies) cannot be resolved THEN prepare a Waste Nonconformance Report (WNCR) in accordance with PRO-U76-WC-4030, *Control of Waste Nonconformances*; and 1-A65-ADM-15.01, *Control of Nonconforming Items*. AND discontinue this procedure.

Waste Generator Supervisor or Designee

- [6] IF the Waste Inspection results are satisfactory, OR IF no inspection is required (i.e., the waste being generated is not radioactive), THEN perform the following:
- [A] Forward a list of the package numbers to the appropriate CSR or designee so that the CSR can perform verification on the packages prior to waste transfer .
- [B] Prior to verification by the CSO, ensure that the following documentation is available for CSO review: one copy of each WGI associated with a load of waste packages, AND one Waste Residue Traveler AND one WEMS Package Accuracy Report for each waste package to be verified.

CSO

- [7] Complete the verification of the waste packages for acceptance by Waste Management in accordance with the requirements of MAN-955-099, *Customer Service Organization Operations Manual*.
- [8] IF the waste package is NOT acceptable, THEN notify the Waste Generator Supervisor that a correction or subsequent disposition (i.e., Comments Section of the W/RT explaining the correction or through a WNCR) is needed. Refer to 1-C80-WO1102-WRT and PRO-U76-WC-4030 AND ensure that a WNCR is initiated.

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5.0 DOCK INSPECTION AND VERIFICATION INSTRUCTIONS (continued)

- [9] IF the waste package is acceptable, THEN indicate the acceptance by applying the appropriate signed and dated verification label or other marking(s) to the package and to the Comment Section of the W/RT, in accordance with MAN-955-099, *Customer Service Organization Operations Manual*.

6.0 WASTE TRANSFER/MOVEMENT INSTRUCTIONS

CSO

- [1] Enter the verified package numbers into WEMS on the Verification Screen.
[2] Prepare a list of verified, inspected waste packages.

CSR or Designee

- [3] Compile the information and ensure that the Material Transfer Coordinator is notified of the number of verified waste packages by waste type and waste package type.

Material Transfer Coordinator

- [4] Schedule the waste package transfers and notify the CSR(s), Waste Generator Supervisor, and receiving facility point-of contact, as appropriate, 24 hours prior to the scheduled moves as appropriate.

Transfer/Shipping Facility

- [5] Prepare, or request preparation of, the appropriate source document (e.g., NMDTR, ITR, or Appendix 6, PRO-1015-S&ATS-1.0) and onsite waste acceptance paperwork prior to transfer.

CSR or Designee

- [6] The following step is always required for receipt of waste into Buildings 371 and 569.
- [A] IF requested by the receiving facility, THEN verify that the package numbers listed on the source documents correspond with the package numbers on the verified package list.
- [a] IF the numbers correspond, THEN initial/date a copy of the source documents and provide to or otherwise inform the receiving facility.
- [b] IF the source documents do not correspond, THEN return to step [1] of this section to attempt to locate the error.

Material Transfer Coordinator

- [7] Schedule the waste transfer with Transportation.

Transfer/Shipping Facility

- [8] Load the packages that correspond with the source document(s) onto the transport vehicle in accordance with facility- or Site-specific transfer procedures. Refer to PRO-015-NMT-003, *Site Procedure for Transferring Category III and IV Material*, and MAN-010-MCA, *Materials Control and Accountability Manual*.
- [9] Transfer the package(s) to the receiving facility.

Receiving Facility

- [10] Verify the packages transferred to the receiving facility correspond with the package numbers listed on the source document.
- [11] IF the receiving facility is NOT Building 371 or 569, THEN proceed to Section 8, WGI Close Out Instructions.

7.0 NON-DESTRUCTIVE ASSAY (NDA)**NDA Personnel**

- [1] Perform nondestructive assay on the waste package(s) in accordance with approved procedures.

8.0 WGI CLOSE OUT INSTRUCTIONS**CSO**

- [1] Perform WGI close out and/or revision activities as described in MAN-955-099, *Customer Service Organization Operations Manual*.

9.0 WGI REVISION INSTRUCTIONS

NOTE: *During the course of some waste generating activities, it may become necessary to change or correct WGI(s). Waste Generators are allowed to continue filling in-process waste packages in accordance with the current WGI revision under which the packages were initiated, provided that the new revision was the result of a change that would not affect the certifiability (i.e., meets on-and/or off-site requirements, as applicable) of the package.*

CSR or Designee

NOTE: *Refer to MAN-955-099, Customer Service Organization Operations Manual.*

- [1] Coordinate the WGI revision by returning to Section 4.0 through 4.2 and complete Steps, as applicable, and re-issuing the revised WGI(s) with a revised WGI number (i.e., the last character of the WGI number, designated revision, will be changed to reflect the new revision).

Waste Characterization SME or Designee

- [2] Return to Section 4.2 AND complete Steps, as applicable.

CSR or Designee

- [3] Transfer a copy of the WGI(s) to the Building/Project Book and Red stamp the WGI, "Master Copy".
- [4] Insert a WEMS generated WGI Summary Report into the front of the Building/Project Book. The report is a listing of all active WGIs for the project/building into the front of the WGI Building/Project book.
- [5] Remove and discard the old WGI Summary Report, and the previous revision of the WGI.
- [6] Notify the Waste Characterization SME that the revised WGI(s) are to be used.
 - [A] IF the previous WGI has NOT been used for any waste packaging activities, THEN discard it.
 - [B] IF the previous WGI has been used for waste packaging activities, THEN ensure that the WGI is available for the Waste Inspectors and the CSO for inspection and verification activities.

Waste Characterization SME or Designee

- [7] Maintain a Building/Project Book of active WGIs for their project or building, AND ensure that old revisions of the WGIs to which waste has been packaged are retained so that the waste can be inspected and verified against the applicable WGI.
- [8] Ensure that personnel packaging waste receive the appropriate WGI and are packaging waste in accordance with these instructions.

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10.0 RECORDS PROCESSING

Records generated by the performance of this procedure are controlled and processed in accordance with 1-V41-RM-001, *Records Management Guidance for Records Sources*, 1-PRO-077-WIPP-005, *Management of Waste Information Prior to Transmittal to the Waste Records Center*, or PRO-1106-LLW-005, *Low Level Quality Assurance Records Management*.

The following documents are initiated, processed, or maintained as a result of this procedure and **SHALL** be processed in accordance with the instructions specified in Table 10-1, Records Processing.

Table 10-1 Records Processing

RECORD IDENTIFICATION	RECORD TYPE DETERMINATION	PROTECTION / STORAGE METHODS	PROCESSING INSTRUCTIONS
Submitted copies of Characterization Data	Non-Record Note to Waste Generators: DO NOT send original data to the CSO	N/A	Destroy when no longer needed
Waste Generating Instruction (WGI) (i.e., field use) See Note 1 below.	Non-Record	N/A	Destroy when no longer needed
Waste Generating Instructions (WGI) Record Copy	See MAN-955-099, <i>Customer Service Organization Operations Manual</i>	See MAN-955-099, <i>Customer Service Organization Operations Manual</i>	See MAN-955-099, <i>Customer Service Organization Operations Manual</i>
M&S Card (Package request document)	In-Process Document	The Responsible Manager SHALL implement a reasonable level of protection to prevent loss and/or degradation.	Process as described in applicable procurement and warehouse procedures.
Package Number List	Non-Record	N/A	Destroy when no longer needed
Waste Package Transfer Documents (e.g., ITR, NMDTR, Receiving facility paperwork, etc.)	In-Process Document	The Responsible Manager SHALL implement a reasonable level of protection to prevent loss and/or degradation.	Forward documents to Receiving Facility prior sending to, or with waste package, as appropriate.
Waste/Residue Traveler and associated attachments (as specified in 1-C80-WO1102-WRT)	In-Process Waste Isolation Pilot Plant (WIPP)/LL/LLM Quality Assurance (QA) Document OR In-Process QA Document	The Responsible Manager SHALL implement a reasonable level of protection to prevent loss and/or degradation while the WRT is in the process of being prepared. If WRT preparation occurs in an office setting, the WRT SHALL be protected utilizing standard office filing equipment and methods, when not in use.	Continue processing as described in 1-C80-WO1102-WRT and other associated work documents
WEMS Waste Package Worksheets	Non-Record	N/A	Destroy when no longer needed.

NOTE 1: The Waste Generating Instruction (WGI) is prepared and processed by the CSO as described in MAN-955-099, *Customer Service Organization Operations Manual*. The CSO will forward the record copy of the WGI to the appropriate record center as specified in MAN-955-099 in accordance with specified requirements. The entry in this table for the WGI is intended to apply ONLY to copies of the WGI used in the field.

12/21/00

11.0 DEFINITIONS AND ACRONYMS

11.1 Definitions

Customer Service Organization (CSO): The Waste Management organization comprised of Customer Service Representatives (CSRs) and Technical Support Staff personnel that provides waste characterization, generation, and packaging services to Waste Generators.

Customer Service Representative (CSR): The individuals within the Waste Management CSO who function as the single point of contact for Waste Generators during the waste generation process, from the planning phase of waste generation to the point at which the waste is turned over to Solid Waste Operations for subsequent storage, processing, or disposal.

Designee: An individual within the Waste Management CSO who has part or all of the responsibilities of a CSR AND reports to the CSR. This individual **SHALL** have the training required to perform their responsibilities as a CSR designee.

Dock Inspection: An inspection of radioactive waste packages after the packages have been loaded and closed, performed by qualified Waste Inspectors. Dock Inspections are performed for all radioactive waste packages that are not In-Process inspected. Dock inspections are completed before waste packages are transferred from one facility to another for repackaging, storage, treatment, or off-site shipment. Nondestructively-assayed wastes that have been assayed in a drum or box counter, such as Passive/Active Drum Counter (PADC), Segmented Gamma Scanner (SGS), or Passive/Active Crate Counter (PACC) require both Pre- and Post-Counter Dock Inspections. Wastes that are not assayed in a drum or box counter, such as TRU waste with individual waste items assay results, require only a Pre-Counter Dock Inspection.

In-Process Inspection: An inspection of radioactive waste packages during the waste packaging process, performed by qualified Waste Inspectors. In-Process Waste Inspections may be performed for a variety of reasons, but are always performed for waste packages that will not be inspected by either Real-Time Radiography (RTR) or a Visual Verification program that is approved by Transuranic (TRU) Projects. Examples of waste packages that require in-process waste inspection include, Surface Contaminated Object (SCO) waste packages or packages that exceed the dimensional requirements of Site assay and RTR units (e.g., Cargo Containers). In-Process Waste Inspections are used to visually verify that waste is compliantly packaged and does not contain prohibited items, as specified in the WGI.

Internal Transfer Receipt (ITR) [RF-20690]: A source document used for non-accountable waste transfers.

Non-Routine Waste Origination Log (NRWOL) [RF47637]: A document used to record the characterization of waste forms that are not identified by the Waste Stream and Residue Identification and Characterization (WSRIC) books.

Nuclear Material And Drum Transfer Report (NMDTR) [RFC-38570]: A source document used for transferring serialized waste packages: (1) from non-Protected Area (PA) to PA facilities; (2) from PA facilities to other PA facilities; (3) from PA facilities to non-PA facilities; (4) from any facility to Buildings 881 and 886; and (5) from Buildings 881 and 886 to any other facility.

Package: A packaging with its contents as presented for transport. (MAN-T91-STSM-001, *Site Transportation Safety Manual*)

11.1 Definitions (continued)

Packaging: A receptacle that may require outer packagings and any other components or materials necessary for the receptacle to perform its containment function and to ensure compliance with the minimum packaging requirements of 49 CFR 100 through 180.

For radioactive material, it may consist of one or more receptacles, absorbent materials, spacing structures, thermal insulation, radiation shielding, and devices for cooling or absorbing mechanical shocks. The conveyance, tie-down systems, and auxiliary equipment may sometimes be designated as a part of the packaging. (MAN-T91-STSM-001, *Site Transportation Safety Manual*)

Post-Counter Dock Inspection: See definition for Dock Inspection.

Pre-Counter Dock Inspection: See definition for Dock Inspection.

Sanitary Waste: Solid waste which is NOT controlled as regulated/hazardous, toxic, or radioactive waste, or a combination thereof, according to 6 CCR 261.1007-3, which meets the Site criteria for disposal in an approved Subtitle D sanitary landfill (per 1-MAN-001-SWODP).

Walk(ing) Down: A thorough physical inspection of the proposed activity, a telephone conversation if the waste generating activity is routine (e.g., step-off pad waste), or review of existing documentation, such as WSRIC or NRWOL characterization data or analytical data.

Waste: Any material that meets the definition of solid waste as defined in 40 CFR 261.2, or any material (regulated or non-regulated) that is destined for recycle or reclamation by Solid Waste Operations, a landfill, or off-site disposal or treatment.

Waste Acceptance Criteria: A compendium of on-site or off-site requirements that must be met for storage and/or disposal of waste.

Waste Characterization SME: Waste Generator that meets the requirements and responsibilities as specified in 94-RWP/EWQA-0014, *Low-Level/Low-Level Mixed Waste Management Plan*; and PLN-97-007, *TRU Waste Characterization Program Training Implementation Plan*.

Waste Generating Instruction (WGI): A document prepared by the CSO that provides the necessary instructions for characterizing (e.g., WSRIC, NRWOL documents), documenting, and packaging waste compliantly for interim storage and ultimate disposal. The WGI is compiled from Site procedures and off-site waste disposal facility WAC, and provides the procedural requirements and formal CSO authorization to generate waste. The WGI will be specific to the waste generating project and will delineate: (1) the number and type of waste packages to be generated, (2) required package labeling, (3) required packaging materials and configurations, and (4) required supporting documentation for subsequent disposal (e.g., Land Disposal Restriction [LDR] form). The WGI also contains a section called the Addendum that details the specific packaging instructions for a waste-generating project or activity.

Waste Generator: Any person or organization whose act or process produces a waste or whose act causes a waste to become subject to regulation or DOE order. This includes any individual who works at the Site (i.e., employees, subcontractors, and DOE contractors) who, as a result of any work activity, generates a waste material that requires packaging and disposal, and who is properly and sufficiently trained and qualified to be responsible and accountable for correct and compliant waste packaging in accordance with the requirements of 1-M12-WO-4034, *Solid Radioactive Waste Packaging Requirements Manual*.

Waste Stream and Residue Identification and Characterization (WSRIC) BUILDING Book: A building-specific controlled document delineating the waste stream characteristics and disposition requirements for wastes generated during routine operations.

12/21/00

11.2 Acronyms

AB	Authorization Basis
ALARA	As Low As Reasonably Achievable
BWRBB	Backlog Waste Reassessment Baseline Book
CCR	Code of Colorado Regulations
CERCLA	Comprehensive Environmental Response Compensation and Liability Act
CSO	Customer Service Organization
CSR	Customer Service Representative
CSR	Customer Service Representative
DOE	Department of Energy
DOT	Department of Transportation
EPA	Environmental Protection Agency
IDC	Item Description Code
ISR	Independent Safety Review
ITR	Internal Transfer Receipt
IWCP	Integrated Work Control Package
LCO	Limiting Condition of Operation
LDR	Land Disposal Restrictions
LLW	Low Level Waste
M&S	Material and Supply
NCR	Nonconformance Report
NDA	Nondestructive Assay
NMDTR	Nuclear Material and Drum Transfer Report
NRWOL	Non-Routine Waste Origination Log
NTS	Nevada Test Site
PA	Protected Area
PACC	Passive/Active Crate Counter
PADC	Passive/Active Drum Counter
PCB	Polychlorinated Biphenyl
POC	Pipe Overpack Component
QA	Quality Assurance
RCRA	Resource Conservation Recovery Act
RFETS	Rocky Flats Environmental Technology Site
RTR	Real Time Radiography
S&A	Safeguards and Accountability

11.2 Acronyms (continued)

SCO	Surface Contaminated Object
SGS	Segmented Gamma Scanner
SME	Subject Matter Expert
TRM	Transuranic Mixed
TRU	Transuranic
W/RT	Waste/Residue Traveler
WAC	Waste Acceptance Criteria
WEMS	Waste and Environmental Management System
WFC	Waste Form Code
WGI	Waste Generating Instruction
WI	Waste Inspection
WIPP	Waste Isolation Pilot Project
WNCR	Waste Nonconformance Report
WSRIC	Waste Stream and Residue Identification and Characterization

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12.0 REFERENCES (Alphabetically listed)

- PRO-1015-S&ATS-1.0 750/904 Surveillance and Administrative Tracking System
- 40 CFR, 261.2 Code of Federal Regulations, Protection of the Environment
- 6 CCR, 261.1007-3 Colorado Code of Regulations
- 1-A65-ADM-15.01 Control of Nonconforming Items
- PRO-U76-WC-4030 Control of Waste Nonconformances
- 1-PRO-Q11-WO-1221 Controls for Updating Waste Package Information In WEMS.
- MAN-955-099 Customer Service Organization Operations Manual
- PRO-M08-WC-4017 Low Level Waste Certification
- PRO-496-WO-LLWP Outdoor Storage/Staging of Low Level and Low Level Mixed Waste Packages and Packagings
- PRO-1106-LLW-005 Low Level Waste Quality Assurance Records Management
- PRO-007-WIPP-005 Management of Waste Information Prior to Transmittal to the Waste Records Center
- MAN-010-MCA Materials Control and Accountability Manual
- PRO-301-WP-1027/NONRAD Non-Radioactive Waste Packaging Procedure
- 1-I34-WO-1103-NRWOL, Non-Routine Waste Origination Log Instructions
- 1-V41-RM-001 Records Management Guidance for Records Sources
- 95-QAPJP-0050 RFETS TRU Waste Characterization Program Quality Assurance Project Plan (QAPjP)
- 1-PRO-573-SWODP Sanitary Waste Offsite Disposal Procedure
- MAN-001-SDRM Site Document Requirements Manual
- PRO-015-NMT-003 Site Procedure for Transferring Category III and IV Material
- MAN-T91-STSM-001 Site Transportation Safety Manual
- PRO-1045-WI-001 Solid Radioactive Waste Inspection
- 4-D99-WO-1100, Solid Radioactive Waste Packaging Procedure
- 1-M12-WO-4034 Solid Radioactive Waste Packaging Requirements Manual
- 1-PRO-X05-WC-4018 Transuranic (TRU) Waste Certification
- 1-MAN-036-EWQA, Section 1.6.1 Waste Characterization Program Manual
- PRO-1103-LLW-001 Waste Records Center Processing Low Level Waste Records
- 1-C80-WO1102-WRT Waste/Residue Traveler Instructions
- 4-H19-WSRIC-001 WSRIC Characterization and Reverification

EXAMPLE

APPENDIX 1

WASTE GENERATING INSTRUCTION

NO. GI99XXXXYYYYA

IDC #: OXXX:	WASTE TYPE: XXX	NTS PROFILE # OR TRUCON CODE:
--------------	--------------------	----------------------------------

WASTE DESCRIPTION

[Waste stream description from IDC Description file]

[Additional descriptive information about the contaminants in the waste stream, such as, "This waste contains RCRA hazardous constituents and is RCRA regulated hazardous waste. "]

CHARACTERIZATION BASIS:

Characterization of this waste stream is based on process knowledge for the following WSRIC waste streams.

PROCESS NAME	PROCESS NUMBER	IDC OR WFC	CHEMICAL CONSTITUENT CODE RCRA REGULATED	CHEMICAL CONSTITUENT CODE NONRCRA REGULATED	COMP CODE	RCRA HAZARDOUS WASTE	LAND DISPOSAL RESTRICTED	EPA CODES

The above table should be used to complete the informational requirements in Subsection 1C of the Traveler

[Other characterization information, such as requirements for WSRIC process codes with variable waste streams, SCO waste, depleted uranium, etc.]

PACKAGE TYPE/QUANTITY:

Based on waste generation forecasts for this project, [specific number of packages in alpha format, (number of packages in numeric format) package type description] are approved for this WGI.

Order empty packages through the Site warehouse. The signature of the Customer Service Representative is required on the Material and Supply (M&S) card.

[Additional information, such as requirements for SCO waste characterized as Radioactive Material n.o.s., etc.]

PACKAGE LINER REQUIREMENTS:

[Specific liner requirements, such as "one (1) 55-gal polyethylene drum liner bag (10 mil)"]

[Additional liner requirements, such as requirements for light IDCs, sharp objects, etc.]

PACKAGE LABEL REQUIREMENTS:

Refer to Addendum for waste item labeling requirements.

[Specific required labels, such as the Radioactive Material Tag/Label, Asbestos Label, Beryllium Label, On-Site Hazardous Waste Label, classified waste, etc.]

PACKAGING REQUIREMENTS:

Refer to Addendum for specific packaging requirements.

[Unique or specific packaging requirements, such as specific TRUCON Code packaging instructions, requirements for asbestos, Be, PCBs, classified shapes/IDCs, light IDCs, RTR, etc.]

PACKAGE DOCUMENTATION REQUIREMENTS:

Waste/Residue Traveler

[Specific documentation requirements, such as the Nuclear Material and Drum Transfer Report, blocking and bracing plan, SCO characterization, signed WSRIC Residue/Waste Stream Characterization Worksheet (for variable waste), documentation of vented and/or filtered status, etc.)

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EXAMPLE

APPENDIX 1

WASTE GENERATING INSTRUCTION (continued)

ACCUMULATION/STORAGE/DISPOSAL:

Contact the Customer Service Organization with a list of packages to be WGI verified and to arrange transfer.

[Description of specific waste generation process flow for the package, as known at the time of generation, such as, "Filled packages will be assayed in Building 371 or Building 569;" "Filled packages will be examined by RTR in Building 664 or Building 569"].

[Additional requirements for storage and accumulation, such as package-specific outdoor storage requirements, RCRA/CERCLA storage requirements, PCB ballast storage requirements etc.]

WGI ATTACHMENTS:

Waste package Type XXX Waste Generating Instruction Addendum, Revision X.

[Other attachments that may be useful to the generator, such as packaging diagrams from 4-D99-WO-1100].

AUTHORIZATION:

The signature below authorizes the generation and packaging of the above described waste.

CUSTOMER SERVICE REPRESENTATIVE : [CSR NAME]

SIGNATURE _____ DATE _____

[Other signatures as required, such as concurrence from TRU/TRM Projects for exceeding a wattage limit].

CONCURRENCE:

CRITICALITY SAFETY:

SIGNATURE _____ EMPLOYEE# _____ DATE _____

Signature signifies that the facility is aware of packaging and the activities are consistent with Building Criticality Safety Requirements

GENERATOR ACKNOWLEDGEMENT:

This instruction has been issued to: _____ (Generator Name), (Generator Building or Location) _____

The Signature below acknowledges the contents of this instruction and documents the agreement to adhere to these requirements.

SIGNATURE _____ EMPLOYEE# _____ DATE _____

COMMENTS:

EXAMPLE

APPENDIX 1
(WASTE PACKAGE TYPE)
WASTE GENERATING INSTRUCTION ADDENDUM

WARNING: CEASE OPERATIONS IF WASTE OR PACKAGING OPERATION DO NOT MEET THESE REQUIREMENTS

GENERAL INSTRUCTIONS AND NOTES

1. This Addendum is a compilation of instructions and requirements from a variety of documents and procedures, but primarily from 4-D99-WO-1100, *Solid Radioactive Waste Packaging Procedure*. These instructions have been abbreviated because the information is thoroughly covered in the Waste Generator Qualification. IF additional clarification of, or detail about, any of the abbreviated instructions is needed, THEN contact the CSR or refer to 4-D99-WO-1100, as appropriate.
2. Person(s) performing the following actions SHALL be Waste Generator qualified and SHALL maintain physical control of generated waste items until deposited into controlled waste package.
3. Waste packages SHALL be secured (locked or kept in locked area) when unattended.
4. Waste items SHALL only be transferred from one Waste Generator to another if BOTH are qualified Waste Generators AND knowledgeable of generation source and process in order to document all associated characterization information for waste items on W/RT.
5. Ensure that all three (3) pages of this Addendum are present prior to beginning waste generation activities.

[A] PREREQUISITES FOR WASTE PACKAGING

1. Review all sections and attachments of WGI.
2. Perform all Building-specific or Unit-specific pre-requisite actions (e.g., obtain Rad. Work Permit, ALARA review, pre-evolution briefings, PODs, Nuclear Material Safety Manual 03.12 briefings, etc.).
3. Observe all Building-specific or Unit-specific postings and information (e.g., rad control instructions, etc.).
4. Obtain/determine Building-specific or Unit-specific information (e.g., operations manager, facility manager, generation room number, RCRA Unit number, as applicable).

PACKAGE SET-UP FOR (SPECIFIC PACKAGE TYPE)

1. Verify that package is empty AND empty tag/label is attached to package.

Note: Radioactive material packages that are empty (whether they have previously contained radioactive material or not) SHALL be marked in accordance with the requirements of WO-4034, Appendix 2, *Referenced Forms, Tags, and Markings*.

2. Verify that package has been stored properly...
3. (Additional requirements from Source Documents, such as WO-1100)

[C] WASTE ITEM PACKAGING INTO (SPECIFIC PACKAGE TYPE)**General Instructions**

- Reduce large items to make most of package capacity and package waste to eliminate void spaces. Cutting or sawing operations may require an IWCP prior to size reduction activities. IF size reduction fails THEN contact Customer Service Organization.
- Do not package the following PROHIBITED ITEMS unless clearly specified as allowable in appropriate section(s) of WGI: (as specified in appropriate source document, such as WO-1100).
- (Additional requirements from Source Documents, such as WO-1100)

Specific Instructions

1. Verify that package type/liner(s) correspond with those specified in WGI.
2. Ensure that waste items to be placed into package conform with characterization/IDC/labeling information associated with waste package and WGI.
3. Complete and attach all labels specified in WGI.
4. (Additional requirements from Source Documents, such as WO-1100)

[D] PACKAGE CLOSURE FOR (SPECIFIC PACKAGE TYPE)

1. Obtain WEMS barcode extended number AND record extended number in W/RT or attach to W/RT.
2. IF a fiberboard liner was used, THEN install fiberboard liner top.
Close plastic liner(s) using approved method (e.g., twist-and-tape, fold-and-tape).
4. (Additional requirements from Source Documents, such as WO-1100)

Solid Radioactive Waste Packaging Requirements Manual
Document Title

1-M12-WO-4034, Revision 2
Existing Document Number and Revision

New Document Number and Revision (if Applicable)

Type of Document

- Policy Directive Manual Technical Standard
 Procedure Instruction Job Aid Other

Type of Modification

- New One Time Use Only Change Editorial
 Revision Intent
 Cancellation Non-Intent

9 Effective Date: 4/27/00 Expiration Date: 4/27/03

① DCF Originator: Karen Kuhns *[Signature]* 4/20/00
Print Sign Date
Organization: Customer Service Organization
Phone/Pager/Location: 4665/230-7952/T1301

② Responsible Manager: Pat Arnold *[Signature]* 4/26/00
Print Sign Date
Organization: Production Control
Phone/Pager/Location: 2056/1067/T1301

③ Assigned SME: Karen Kuhns *[Signature]* 4/26/00
Print Sign Date
Phone/Pager/Location: 4665/230-7952/T1301

④ Prescreen/SES/USQD Number: SES-REP-001203-WGM
Independent Safety Review: SOBC-00-07

Item	Page/Section	Step	Intent or Non-Intent	Proposed Modification and Justification
1	1	N/A	n	Corrected organization names to correspond with current re-organization; added new SES and ISR numbers; added new classification sign-off.
2	2	N/A	n	Updated List of Effective Pages (LOEP).
	4-5	N/A	n	Updated Table of Contents (TOC) to correspond with document section/table titles.
	Global: 6,35	N/A	n	When possible (due to space constraints in document) removed the acronym "CSO" and replaced with "Customer Service Organization" to avoid confusion with "Criticality Safety Officer (CSO)".
5	Global: 6,7,16	N/A	n	Updated scope to reflect new title of site transportation documents (i.e., Site Transportation Safety Manual [STSM]). Also deleted reference to Onsite Transportation Safety Committee.
6	Global: 6,16	N/A	n	Added references for commodity procurement procedures (e.g., 1-W36-APR-111, PRO-492-CCP-001, and/or 1-V51-COEM-DES-210).
7	6/1.2	N/A	n	Deleted statement "The manual is a total rewrite....." because this change is a DCF rather than a revision.
8	Global: 7,27	N/A	n	Corrected location of TRUPACT-II Content Codes abbreviation; Corrected PCB Management Plan reference to reflect current document.
9	7/1.3	N/A	n	Added reference to "Outdoor Storage/Staging of Low Level and Low Level Mixed Waste Packages and Packagings (PRO-496-WO-LLWP)"
10	8/1.4	N/A	n	Deleted much of the background information text because the clarification was needed during Revision 2, but is understood now. Also added clarification that the WGI is used as a derivative document (i.e., all requirements and instructions are compiled from approved site documents; disposal facility documents; regulations). WGIs are not source documents for requirements and instructions.
11	10/2.1 Tbl 2.1	N/A	n	Added responsibilities section for Safety and Hygiene Personnel.
12	11/2.1 Tbl 2.1	N/A	n	Deleted the word "Organization" from "Waste Generator Organization Supervisors" to eliminate the implication that all Waste Generators reside in the same organization.
13	12/2.2.2	Note 2	n	Added reference to NCR procedure (PRO-U76-WC-4030)
14	17/3 Tbl 3-2	N/A	n	Added specific HSP reference (i.e., 1-P21-HSP-18.04) for sources.
15	18/3 Tbl 3-3	N/A	n	Changed "terminate" to "suspend" to avoid confusion over terminology. "Terminate" generally applies to AB actions taken for TSP/AC violations.
16	19/4.1 Tbl 4-1	N/A	n	Corrected definitions for LLW and TRU waste to correspond with the definitions in the DOE Radioactive Waste Management Manual, DOE M435.1-1, 7/09/99.
	20/4.2 Tbl 4-2	N/A	n	Specified that the Customer Service Organization and Traffic Management determine appropriate characterization methodologies for limited quantity LLW.
18	21/5 Tbl 5-1	N/A	n	Spelled out CSO and corrected organization name to "Traffic Management."

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Item	Page/Section	Step	Intent or Non-Intent	Proposed Modification and Justification
19	22/6.1	N/A	n	Added note to ensure that all readers understand that chemicals in the same package must be compatible with each other.
	23/6.2	D new	n	Changed Note 2 into subsection d.
	24/7 T7-1	1b LLW	n	Added NTS reference (NTS WAC, Section 3.1.6) for LL criteria.
22	25/7 Tbl 7-1	2a LLW	n	Changed "Site-imposed" to "49 CFR-imposed" to accurately reflect source of requirement.
23	27/7 Tbl 7-1	9g TRU	i	Added exception to the requirement for wetting TRU/TRM friable asbestos waste. 29 CFR 1926.1101(g)(6)(I) allows alternative methods for controlling friable asbestos provided that the control maintains an exposure level below the PEL. Site gloveboxes have been demonstrated as effective controls for friable asbestos, as documented in two letters. The first letter is from Russell Bittinger, K_H OS&IH, to Alan Church, Customer Service Organization, with the subject: <i>Wetting of Friable Asbestos Contaminated TRU Waste</i> - RJB-016-99, October 13, 1999. The second letter is from E.L. D'Amico, TRU/TRM Waste Projects, to A.A. Church, Customer Service Organization, with the subject: <i>Friable Asbestos-Contaminated Transuranic Waste</i> - ELD-002-00, January 13, 2000.
24	28/7 Tbl 7-1	12 c	n	Deleted criteria c, which referred to treating reactives before packaging, and added the information as a note indicating that "reactives may be packaged if rendered non-reactive through an approved process."
25	29/Tbl 7-1	17a LLW	n	Changed "Type A" to "fissile material" packaging because Type A packagings are not the only allowable DOT packaging for this type of waste.
26	30/Tbl 7-1	notes	n	Added "436F" to Table Note 8 because it had been inadvertently omitted from the previous DCF.
27	31/8.3	N/A	n	Specified that "shipments" of materials rather than the materials themselves are inspected upon receipt through the Site inspection process. The original language was incorrect. Also added a reference for the Procurement QA Requirements document.
28	32/8.4	N/A	n	Updated reference. The original reference, ANSI N45.2.2-1972, was superseded by ASME NQA-1-1997.
29	33/8.4 Tbl 8-2	N/A	i	Added storage requirements for Strong Tight Supersacks and Cargo Containers. Reworded note associated with Cargo Containers.
	34/9 Tbl 9-1	1 a	n	Added the word "payload" before "package" and then gave examples of "payload packages" to correspond with the language in DOE/WIPP-069. Split "d" into two criteria and rephrased the information.
31	36/9 Tbl 9-1	3a, 4b, 4f	i	Added clarification that wattage and Criticality Safety Limits must be checked and compliance with the lower of the two is required; Deleted Table 10-1 later in document, so deleted references to it in 3a and 4b. Added 4f to correspond with new language in TRUCON Codes.
32	37/9 T9-1	9a	i	Added Strong Tight Cargo Containers and Supersacks to exceptions list for venting.
33	38/9 T9-1	12a LLW	i	Added Strong Tight Cargo Containers and Supersacks to storage requirements
34	39/9 Tbl 9-1	Notes	n	Moved Notes 4 - 8 from Table 10-1 (notes 1-5) when Table 10-1 was deleted because the notes are also useful in clarifying items in this table.
35	40/10	Tbl	n	Deleted Table 10-1, TRU/TRM Waste - Allowable Inner Confinement Layers and Decay Heat Limitations. This information is derived from TRUCON Codes and is better referenced there than repeated here.
36	43/12.1	N/A	n	Updated reference to QAPIP. Moved note from 12.2 and converted it into an SCO Waste Section.
37	46/13	N/A	n	Added the words "if any" to clarify that the document may show no records in Table 13-1
38	47-48/14	N/A	n	Deleted references to the TSCA Management Plan because it was never issued; Deleted WSRIC Program Description because it was not used as a reference for 4034; Added S&A Manual; Corrected TRUCON Code title; Added STSM and PCB Guidance 32; Corrected Site Security Manual, Site RADCON Manual, and Site SAR; and Deleted RFTSM.
39	50/Appx 1	N/A	n	Deleted reference to 6-inch POCs because they are not to be used on Site; streamlined language in Closure Requirements Section for POCs.
40	51/Appx 1	N/A	n	Deleted option for vented liner in IP-1 drum because not used.
41	52/Appx 1	N/A	n	Added option for vented liner in SWB because TRUCON Code allows use of vented liners in some configurations. Added 3-time closure limit requirement for IP-2 metal box lid tabs as specified in IP-2 design package.
	53/Appx 1	N/A	n	Added 3-time closure limit requirement for IP-2 metal box lid tabs as specified in IP-2 design package; added Strong Tight Cargo Container Requirements
43	54/Appx 1	Note 2	n	Added Strong Tight Supersack Requirements; Added STSM requirements to End Note 2.
44	54A/Appx 1	Notes 7, 16	n	Simplified torque wrench calibration requirements. Added Note 16 to control the use of Supersacks in facilities and ensure that they are used in compliance with facility ABs.

Item	Page/Section	Step	Intent or Non-Intent	Proposed Modification and Justification
	54/Appx 1	Note 1	n	A second end note section was added to accommodate non-final package configuration requirements that are not generally within the scope of this document. Note 1, for the venting of 85-gallon over packs, was added to close out a required action in RFETS Corrective Action Plan for Flammable Gas Generation Issues, December 13, 1999.
46	55/Appx 2	N/A	n	Changed Appendix title and table header to reflect labels as well as forms, tags, and markings. Corrected references to STSM. Added information to empty tag/label section specifying which of the two may be modified for Site use. Corrected various source documents.
46	56/Appx 2	N/A	i	Added RAM NOS and RAM Fissile NOS labels as required by STSM and DOT. Corrected PCB label Source document.
47	66/Appx 3	431	n	Corrected spelling error: "leached" to "leached."
48	68/Appx 3	523	n	Corrected description of IDC as required by TRU Projects.
49	69/Appx 3	532	n	Corrected description of IDC as required by TRU Projects.
50	73/Appx 3	864	n	Deleted "RMRS" from before "Waste Management" to correspond with Site reorganization.
51	74/Appx 4	N/A	n	Added definition for confinement layer.
52	75/Appx 4	N/A	n	Added definition for Drum Filter Vent to close out a required action in RFETS Corrective Action Plan for Flammable Gas Generation Issues, December 13, 1999
53	76/Appx 4	N/A	n	Added Layer of Confinement. Deleted the word "alpha" before "activity" in the definition for LLW to correspond with the definition in the DOE Radioactive Waste Management Manual, DOE M435.1-1, 7/09/99.
54	78/Appx 4	N/A	n	Deleted definition for On-Site Transportation Safety Committee because it no longer exists. Corrected references for the definitions for Package and Packaging.
55	79/Appx 4	N/A	n	Added definition for Strong Tight package
56	82/Appx 5	N/A	n	Deleted acronym for Rocky Flats Transportation Safety Manuals and added acronym for STSM.

Item 14 **OVERALL Justification (for proposed changes above)**

overall justification for this change is to incorporate Site Transportation Safety Manual information, remove a requirement to wet asbestos generated in gloveboxes, and add requirements for strong tight Cargo Containers and Supersacks. An additional change was also made to address a finding in RFETS CAP for Causal Analysis of Flammable Gas Generation Issues, December 13, 1999, regarding the need to vent all 85-gallon overpack containers to prevent flammable gas generation. A variety of other non-intent/editorial changes and corrections are also being included under this DCF.

15	16	17	15	16	17
Reviewing Organization	Name of Reviewer	Date	Reviewing Organization	Name of Reviewer	Date
Traffic Management	Vic Arment /s/ for Ken Lenarcic	4/13/00	RISS	P. Granquist /s/ for S. Nesta & J. Long	4/5/00
Waste Inspection	P. Arnold /s/ For J. Anguiano	4/18/00	Criticality Safety	R.D. Harris /s/ for H. Gilpin	4/18/00
Production Control, RM	P. Arnold /s/ <i>P. Arnold</i>	4/26/00	559 Lab	I. Ligon /s/ for D. Hunter	4/18/00
TRU Project	E. Ater /s/	4/17/00	F&A	D. Kelly /s/	4/3/00
ESH&Q	T. Benton /s/ For K. Foster	4/3/00	Customer Service Organization	<i>K. Johns (S&E)</i>	4/26/00
HR&C	M. Collins /s/	4/18/00	LL Projects	T. Lewenberg /s/	4/18/00
HR&C/Training	A. Carroll /s/ for D. Dole	4/6/00	707 Closure Project	C McGaughy /s/	4/18/00
TRU Projects	E. D'Amico /s/ for J. O'Leary	4/12/00	RISS	G. Solner /s/ for S. Nesta & J. Long	4/13/00
QA	G. DiGregorio /s/	4/4/00	Rad Eng	M. Richards /s/	4/12/00
Material Stewardship, Nuclear Safety	A. Dye /s/ for H. Gilpin	4/17/00	SNM Removal	M. Stanley /s/ for B. Leonard	4/17/00
Safety & IH	K. Farley /s/ for Bittinger	4/18/00	Traffic & Transportation	B Swenson /s/	4/18/00
WC&O (TRU/TRM)	C. Ferrara /s/	4/13/00	SNM Removal	D. Thorp /s/	4/4/00
WC&O (TRU/TRM)	G. Geisinger /s/	4/18/00	TRU Projects QA	J. Tressell /s/	4/26/00
Site Quality Programs, ESS	D. Gillespie /s/ For L. Smith, S. Knapp, G. Kelly	4/12/00	371 Project ESH&Q	M. Wiebe /s/ for T. Brody	4/12/00

Approval Authority
 Print: J.D. Bradford Sign: /s/ Date: 4/26/00
 Waste Projects

① Originator: Karen Kuhn *[Signature]* 12/6/99
Print Sign Date

Organization: Customer Service Organization

Phone/Pager/Location: 4665/230-7952/T130J

② Responsible Manager: Pat Arnold *[Signature]* 12/6/99
Print Sign Date

Organization: Waste Generator Support Group

Phone/Pager/Location: 2056/1087/T130J

③ Assigned SME: Karen Kuhn *[Signature]* 12/6/99
Print Sign Date

Phone/Pager/Location: 4665/230-7952/T130J

④ Prescreen/SES/USOD Number: SEP-REQ-00-0397-D M
Independent Safety Review (ISRC): 019

① Solid Radioactive Waste Packaging Requirements Manual
Document Title
1-M12-WO-4034, Revision 1
Existing Document Number and Revision
1-M12-WO-4034, Revision 2

New Document Number and Revision (if Applicable)

Type of Document

- Policy
- Directive
- Manual
- Technical Standard
- Procedure
- Instruction
- Job Aid
- Other

Type of Modification

- New
- One Time Use Only
- Revision
- Cancellation
- Change Editorial
- Intent
- Non-Intent

9 Effective Date: 12/09/99 Expiration Date: 12/09/02

Item	Page/Section	Step	Intent or Non-Intent	Proposed Modification and Justification
1	1/NA	N/A	N	Deleted "Use Category 4" from cover because use categories are not applicable to requirements documents. Use Category was inadvertently carried over from Revision 1 to Revision 2 document.
2	2/NA	N/A	N	Updated List of Effective Pages (LOEP).
3	6/1.2	N/A	N	Added Note 1 to scope indicating that rate and quantity of newly-generated waste are not specified in WO-4034, but are specified in RMRS-WIPP-98-100. Note was added in response to Observation 3 of CAO Audit No. 99-17 (Sept.99).
4	6/1.2	N/A	N	Added Note 2 to scope indicating that WO-4034 applies to all solid radioactive waste, but in certain cases a solid waste may be subject to additional or different requirements covered by specific documents. Note was added to allow use of project-specific manuals/requirements documents, such as the Chemical Waste Management Manual or Profiles (e.g., NTS Profiles) that may specify differing or more stringent requirements to manage waste with variable chemical properties.
5	14/3 Table 3-1	N/A	N	Re-worded "Non-NDA Waste Survey Requirements" to "Waste Survey Requirements for Waste That Will Not be Non-Destructively Assayed" to clarify meaning. Wording changed because original wording was abbreviated to the point of being confusing.
6	22/6.1 & 6.2	N/A	N	Added note in Table 6-1 directing reader to Section 12.2.2 for additional requirements for commingling IDCs. Note was added because readers were not aware of associated requirements in Section 12.2.2 Added second note to Section 6.2 indicating that the predominant IDC is used to define the contents of a waste package with multiple IDCs.
7	24/7.	N/A	N	Added note to clarify that waste form acceptance criteria in this section apply to all waste covered by WO-4034 unless criteria are specifically covered by an approved site or disposal-facility requirements document. Step was added to assure that existing programs, such as the Waste Chemical Program, that rely on approved profiles (e.g., NTS, Envirocare) and other approved documents (e.g., Chemical Management Manual) to manage waste with unique properties would not be erroneously terminated by confusion over the meaning of this section.
	24/7. Table 7-1	N/A	N	Added note to Table 7-1 indicating that not all waste form criteria in the table are specified in an implementing procedure because other criteria are used to implement controls.

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Item	Page/Section	Step	Intent or Non-intent	Proposed Modification and Justification
9	27/7. Table 7-1	10a 10d	N	Deleted reference to August 99 issue date for PRO-673-EWQA-1.5 because document has not been issued and may not be issued until after January 1, 2000.
10	29/7 Table 7-1	20	I	Added TRU/TRM waste prohibition for waste exhibiting characteristic of ignitability in response to Observation 3 of CAO Audit 99-17 (Sept 99) and new WIPP Waste Analysis Plan (WAP). Added corresponding LL/LLM waste prohibition for ignitable waste based on NTS WAC requirements (Section 3.1.4)
11	29/7 Table 7-1	21	I	Added TRU/TRM waste prohibition for wastes that are incompatible with backfill, seal and panel closure materials, container and packaging materials, or shipping container material or other wastes in response to Observation 3 of CAO Audit 99-17 (Sept 99) and new WIPP Waste Analysis Plan (WAP).
12	33/8.4 Table 8-2	N/A	N	Corrected error. "4-D99-WO-4034" changed to reflect proper reference "4-D99-WO-1100."
13	34/9. Table 9-1	1a	N	Corrected spelling error: "Miiirem" to "Millirem."
14	38/9 Table 9-1	12	N	Added note reminding readers that Specific Building Authorization Basis documents may be more restrictive. The implication of the reminder is to ensure that readers comply with the most restrictive requirements.
15	38/9 Table 9-1	12b	N	Added note of clarification for LLW/LLM waste readers explaining that Level C requirements are defined in the TRU/TRM waste column for the same criteria (i.e., criteria b).
16	42/11.1	N/A	N	Deleted majority of note regarding exemption from NDA requirements because it did not provide clarification and appeared to conflict with the requirement above it.
17	43/12.1 & 12.2.1	N/A	I	Divided RTR requirements for off-site shipment into categories for TRU/TRM and LL/LLM waste. Added 100% inspection as a LLW/LLM waste option for by-passing RTR (v.s. the variance process). Added Visual Examination (VE) as a TRU/TRM waste option for by-passing RTR. Added note to Section 12.2.1 indicating that the predominant IDC is used to define the contents of a waste package with multiple IDCs.
18	48/Ref.	N/A	N	Added RMRS-WIPP-98-100, Acceptable Knowledge TRU/TRM Waste Stream Summary, to References (the reference was used above in Item 3, Scope)
19	49/Appx 1	N/A	N	Added note to table clarifying that some packaging configurations presented in the table could vary slightly if allowed by an approved TRUCON Code or site-approved profile for an offsite treatment, storage, and/or disposal facility (e.g., NTS). The note was added because although the configurations in the table apply for the DOT configurations presented, in some cases (i.e., for certain waste forms) an exception to the configuration is required to comply with requirements specified in off-site disposal facility criteria. In other words, this note was added to ensure that strict adherence to the table requirements (which are based on DOT criteria) did not contradict off-site disposal facility criteria/requirements (e.g., TRUCON Codes), which would result in the generation of waste packages that could not be shipped offsite.
20	56/Appx 2	N/A	N	Deleted reference to August completion date for the PCB Management Plan.

Item 14 OVERALL Justification (for proposed changes, above)

The overall justification for this change is to incorporate a procedure reference and two prohibited items specified in the new WIPP Waste Analysis Plan in response to Observation 3 of CAO Audit 99-17 (Sept. 99) [Items 3, 10, and 11 of this DCF]. A variety of other non-intent/editorial changes and corrections are also being included under this DCF.

(15) Reviewing Organization	(15) Name of Reviewer	(17) Date	(15) Reviewing Organization	(15) Name of Reviewer	(17) Date
RMRS LL/LLM Waste Projects	P. Aguilar For Terry Loewenberg	/s/ 12/03/99	RMRS QA	Mark Castegnari	/s/ 12/06/99
K-H Wst. & Rem. Ops.	S. Anderson	/s/ 12/06/99	RMRS TRU/TRM Waste Projects	E. D'Amico For J. O'Leary	/s/ 12/06/99
Waste Inspection	J. Anguiano	/s/ 12/06/99	K-H WC&O (TRU/TRM)	C. Ferrera	/s/ 12/03/99
RMRS Waste Generator Support Group, RM	P. Arnold	/s/ 12/06/99	RMRS CSO, SME	K. Kuhns	/s/ 12/06/99

Approval Authority: A.D. Rodgers, K-H Waste and Remediation Operations. Sign: [Signature], Date: 12/9/99

1
DCF Originator: Karen Kuhns /s/ 9/25/00
 Print: Sign Date:
Organization: Customer Service Organization
Phone/Pager/Location: 4665/230-7952/T1301
 Phone Pager Location

2
Responsible Manager: Pat Arnold /s/ 9/25/00
 Print Sign Date:
Organization: Production Control
Phone/Pager/Location: 2056/1067/T1301
 Phone Pager Location

3
Assigned SME: Karen Kuhns /s/ 9/25/00
 Print Sign Date:
Phone/Pager/Location: 4665/230-7952/T1301
 Phone Pager Location

8

4
Solid Radioactive Waste Packaging Requirements Manual
 Document Title
1-M12-WO-4034, Revision 2
 Existing Document Number and Revision

 New Document Number and Revision (if Applicable)

5
Type of Document
 Policy Mgt. Directive Manual Procedure
 Tech. Standard Instruction Job Aid Other

6
Type of Modification
 New Change
 One Time Use Only Minor
 Revision Major
 Cancellation

8 Effective Date: 9/28/00 Expiration Date: 9/28/03

9 Page	Section	Proposed Modification	10 Justification
2	N/A	Updated LOEP	N/A
6	1.2	Deleted WGI-001 and CCP-001 as references for procurement of non-standard packages.	Correction corresponds with Site Procurement reorganization.
11	2.1	Added new Waste Inspection Procedure number, PRO-1045-WI-001.	New WI procedure was issued 8/30/00.
12	2.2.1	Added reference # to TRU Waste Characterization Program (TWCP) TIP, PLN-97-007.	N/A
14	3, Table 3-1	Added note to "Waste Survey Requirements..." block to reference MAN-010-MCA for material control and accountability measurement requirements.	Note raises waste generator level of awareness of other requirements that may apply to waste packages.
14	3, Table 3-1	Added "in accordance with procedures specified for waste characterization" to end of "Waste Survey Requirements" Explanation block.	Language ensures that survey requirements are completed in accordance with a procedure.
14	3, Table 3-1	Added new block to table: "Requirements for Waste Package Examination."	Information was requested to be in the table, so the language in Section 12.1 was repeated here.

(Continued next page) →

11	12	13	11	12	13
Reviewing Organization	Signature or Name of Reviewer	Date	Reviewing Organization	Name of Reviewer	Date
Traffic Management	V. Ament /s/ for K. Lenarcic	9/14/00	LL/LLW WC&O	G. Geisinger /s/	9/5/00
Waste Inspection (MS&OSP)	J. Anguiano /s/	8/29/00	Site Quality Programs, ESS	D. Gillespie /s/ for M. Brown	9/7/00
Production Control, RM	P. Arnold /s/	9/25/00	RISS	P. Granquist /s/ For P. Thomas	9/8/00
TRU Project	A. Alar /s/	9/12/00	Criticality Safety	R.D. Harris /s/ for H. Gilpin	9/12/00
771 Closure Project	G. Bracken /s/ for M. Kriz	9/8/00	Nuclear Safety	W. Hartlieb /s/	9/6/00
TRU Project	E. D'Amico /s/ for J. O'Leary	9/12/00	Customer Service Organization	K. Kuhns (SME) /s/	9/25/00
LL Project QA	G. DiGregorio /s/	9/6/00	707 Closure Project	K. Lavorato /s/ for R. Smart	9/8/00
MC&A	S. Doty /s/	9/14/00	LL Project	T. Loewenberg /s/	9/19/00
TRU Project QA	C. Ferrara /s/	9/12/00	TRU/TRM WC&O	T. Putnam /s/	9/14/00
776/777 Closure Project	M. Ferrari /s/ for V. Scott	9/6/00	Rad. Engineering	M. Richards /s/	9/11/00
			371/374 Closure Project	M. Wiebe /s/ for D. Gonzales	9/11/00

14 (Completed to approve changes and cancellations only. New Documents and revisions are approved by signature on the document cover page.

Approval Authority: J.D. Bradford /s/ 9/25/00
 Print Name Sign Date

Additional Useful Information That is Not Required for this Form:
 Prescreen/SES/USQD Number: SES-RFP-002081-WGH; Independent Safety Review: SORC 00-11

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<p>4 Solid Radioactive Waste Packaging Requirements Manual current Title</p>	<p>5 1-M12-WO-4034, Revision 2 Existing Document Number and Revision</p>
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Page	Section	Proposed Modification	Justification
17	3, Table 3-2	Added "(e.g., tagged)."	Added language to avoid confusion. NCR tags are required for WNCRs.
21	5, Table 5-1	Deleted "(for TRM Waste Only – always required)."	Information is implied by being in the RCRA section.
23	6.2.c	Added criteria to the SCO waste segregation exception to indicate that waste may require segregation if, for any reason, it must be assayed.	Change requested by MC&A to assure that requirements of MAN-010-MCA are met, if applicable.
31	8.3.1	Corrected procurement procedure reference.	Existing reference was incorrect.
32	8.4	Corrected reference to AMSE NQA-1.	The Site uses the 1994 version and not the currently available 1997 version.
33	8.4, Table 8-2	Corrected table title to reference AMSE NQA-1-1994 instead of ANSI.	This error should have been corrected during the last DCF when the ANSI standard was adopted into the ASME NQA document.
33	8.4, Table 8-2	Removed all storage level descriptions (i.e., Level B, C, etc.) and moved information to a new Table 8-3.	Clarification.
33	8.4, Table 8-2	Removed requirement for elevating empty IP-2s and SWBs 4-inches (not including skids) above the ground.	Other criteria in the level B storage description (e.g., area not subject to flooding, floor is well drained) already assure integrity of the skids and packagings.
33A	8.4, Table 8-3	Added new table. No new information in table. Information extracted from Table 8-2. Also added full title of ASME NQA-1-1994.	Clarification.
34	9., Table 9-1, 1.a.	Added note to clarify that source of requirements is 49 CFR	Clarification.
	9., Table 9-1, 8.a.	Corrected contamination limit for TRU/TRM waste from 1,000 dpm per 100 cm ² to 200 dpm per 100 cm ² for beta-gamma-emitting radionuclides to correspond with WIPP WAC.	WIPP WAC is more restrictive than the limit specified Site RadCon Manual, which was previously referenced.
38-39	9., Table 9-1, 12	Removed ASME NQA-1 storage level information and referenced Table 8-3.	Clarification
47	14	Deleted 1-MAN-010-S&A from references.	Document is being revised and will become MAN-010-MCA.
48	14	Added MAN-010-MCA and PRO-1045-WI-001	N/A
49-50	Appx 1	Added note specifying that additional filters may be installed during head-space gas sampling, in accordance with an approved procedure.	The note raises Waste Inspector awareness of the head-space program, which may involve installation of additional filters.
52-53	Appx 1,	Closure Requirements for IP-2 Metal Boxes: all closure tabs must be engaged <u>at closure</u> .	Added last two words to ensure that generators did not keep tabs closed at all times because tabs have a limited life.
52-53	Appx 1,	Clarified what was meant by "engaged more than three times."	Clarification
54A	Appx 1, footnotes	Added note specifying that additional filters may be installed during head-space gas sampling, in accordance with an approved procedure.	The note raises Waste Inspector awareness of the head-space program.
56	Appx 2	Added "Potentially Unstable Lift" marking.	Corresponds with change to the STSM. The label is now required as a result of a CAP to address safety issues.
56	Appx 2	Corrected form number for Radioactive Material Tag/Label to current #.	N/A