

S. Garcia is writing a response to explain the discrepancies. Procedures are not adequate to address the D-D issues. Use INCP instead of process numbers. Meeting w/ them before NOT DOT or RCRA concern.



Procedures do not apply to D-D. MTA. Rocky Mountain Remediation Services, L.L.C. ... protecting the environment

# INTEROFFICE MEMORANDUM

DATE: May 22, 1996  
TO: Distribution  
FROM: J. F. Anguiano, Waste Inspection Tech. Lead/QA. Bldg. T893A, X6306/D1720 JFA  
SUBJECT: SURVEILLANCE BUILDING 707, MOD. J, WASTE GENERATION REPORT NO. RMRS- 96-0007

### Purpose:

The purpose of this surveillance was to determine waste generating and packaging compliance to RFETS procedures; Waste Repository Waste Acceptance Criteria; and Regulatory requirements.

### Scope:

Waste generation and packaging characterization, documentation, and labeling were reviewed and inspected to current waste packaging requirements. This review was limited to the strip-out activities in Module J, Building 707, being performed by RMRS. Surveillance was performed by direct observation on May 15, 1996 @ 2:00 PM. Surveillance Team consisted of J. F. Anguiano, Quality Assurance Engineer/Waste Inspection Technical Lead and D. Mackay, Waste Inspection.

### Personnel Contacted:

- L. Lewis (RMRS), Waste Operations, X7643
- M. Brooks (RMRS), Waste Management Quality Assurance, X5423
- G. Sly (RMRS), Waste Inspection, X7832
- F. Valenzuela (K-H), Waste Certification X2718
- K. Lenarcic (DynCorp), Traffic X2377
- R. M. Richards (K-H), Radiation. Engineering X5148
- H. Finkelman (RMRS), Engineering Construction Decommissioning and Decontamination X5491

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**Results:**

Surveillance of the subject waste generating activity resulted in identification of 4 deficiencies and 2 concerns involving incomplete, inaccurate, and misleading documentation; inaccurate and unidentified labeling; inaccurate procedures; and the generation of uncharacterized waste as a result of glovebox removal operations in building 707 Module J. It should be noted, that identified deficiencies could be considered serious in nature and must be corrected to ensure that Decommissioning and Decontaminations operations are properly implemented from pilot programs to full scale operations.

Waste/Residue Travelers (W/RT): Deficiency

- 1) W/RTs are not being completed as required by 1-C80-WO1102-WRT.

Supporting surveillance results:

- Radioactive waste drums surveilled (5 of 6 closed drums) did not have a completed Subsection 1A. "Note 2" in 1-C80-WO1102-WRT requires that the employee number be recorded "in the RCRA Unit ID number at the point of generation blank." This verifies that packaging material has been inspected and is acceptable. See Drum numbers D86932 and D86929 for examples
- Drum numbers D86935, IDC 336, "in process," did not have "Line" or "Non-Line Generated" subsection 1C completed as required, by 1-C80-WO1102-WRT. In addition, the NRWOL inserted into the W/RT indicates two IDC 336 waste types, one "Line Generated" and one "Non-Line Generated." It is not clear which waste type is in this drum based on the container information.
- Drums numbers D86932 and D86929 did not have the horseshoe TID number recorded in the carbon filter TID space as required by 1-C80-WO1102-WRT, Section 8.6, Step 5.
- Section III, subsection 3B, "Storage or Shipping Category" was completed on several W/RTs without subsection 3A being completed. Subsection 3A requires a check or X in the N/A box, employee signature, employee number, and date. In addition, the employee number and date have not been recorded as required by 1-C80-WO1102-WRT, section 10.1. Reference Drum number D86932 and D86929.

As a result of a discussion with S. Garcia, a CMCAP (Identification no. 96-001192, Plan no. 01) was issued to Waste Generator Services for noncompliance to instructions contained in 1-C80-WO1102-WRT.

Procedure Deficiencies

- 1) Procedures 4-D99-WO-1100, Solid Radioactive Waste Packaging Inside Of The Protected Area, 4-C77-WO-1101, Solid Radioactive Waste Packaging Outside Of The Protected Area, 1-C80-WO1102-WRT, Waste/Residue Traveler Instructions have not been updated to include the 8/95 W/RT revision. In addition, 4-D99-WO-1100, Solid Radioactive Waste Packaging Inside Of The Protected Area, 4-C77-WO-1101, Solid Radioactive Waste Packaging Outside Of The Protected Area do not contain the current NRWOL in use required by 1-I34-WO1103-NRWOL, Non-Routine Waste Origination Log Instructions.

Supporting Surveillance Results:

- W/RTs being utilized to document waste generation and packaging were compared to the W/RT in 1-C80-WO1102-WRT, Waste/Residue Traveler Instructions. It was found that revision 8/95 had not been incorporated into the current procedure. Procedure 1-C80-WO1102-WRT, Waste/Residue Traveler Instructions contained a 5/94 revision of the W/RT. One revision 8/95 and five revision 5/94 W/RTs were being utilized.
- Procedures 4-D99-WO-1100, Solid Radioactive Waste Packaging Inside Of The Protected Area and 4-C77-WO-1101, Solid Radioactive Waste Packaging Outside Of The Protected Area have not been updated to identify the 8/95 revision of the W/RT. WO-1100, WO-1101, and WO-1102 contain the old revision of W/RT dated 5/94. Review of the 2 W/RT revisions revealed very little difference.
- Two drums have 2 different radiation survey labels applied. None of the radiation survey labels used are identified in 4-D99-WO-1100, Solid Radioactive Waste Packaging Inside Of The Protected Area and 4-C77-WO-1101, Solid Radioactive Waste Packaging Outside Of The Protected Area. This comment is also included as Supporting Surveillance Results under Procedure Deficiencies.

A CMCAP (Identification no. 96-001192, Plan no. 01) was issued to P. Edrich, Waste Systems for procedures 4-D99-WO-1100, Solid Radioactive Waste Packaging Inside Of The Protected Area, 4-C77-WO-1101, Solid Radioactive Waste Packaging Outside Of The Protected Area, 1-C80-WO1102-WRT, Waste/Residue Traveler Instructions containing outdated Appendices (Page 1 of the W/RT and the NRWOL). Reference requirements contained in 1-A03-PPG-004, Procedure Edit, Review, and Comment, Appendix 7 & 9.

Procedure Concern:

- 1) Instructions contained in 1-C80-WO1102-WRT, Waste/ Residue Traveler Instructions, make the assumption that waste has been fully characterized prior to generation. A Document Modification Request (DMR) should be considered to offer instructions for the generation of waste which has not been fully characterized and is pending analysis. The generation of waste which has not been fully characterized may lead to unacceptable packaging by DOT and Waste Repository standards and requirements. Procedures, systems, and operations must be put in place which will produce a certifiable product without the additional expense and hazards associated with repackaging.

Supporting Surveillance Results

- Subsection 1C, Block 14, is not being filled out consistently. A review of 1-C80-WO1102-WRT, Waste/ Residue Traveler Instructions, indicates that this block is to be filled out for the generation of RCRA regulated waste. Some W/RTs have N/A put into this block and some are left blank. A review of NRWOLs indicated that paint samples have been taken (results unknown) for a lead determination. It is inappropriate to enter N/A in block 14 if analytical results have not been completed. If hazardous waste determinations have been completed then W/RTs, in which subsection 1C, Block 14, was left blank, should be completed. Discussion with S. Garcia, Waste Generator Services indicated that generated waste was analyzed and determined nonhazardous.

Marking and Labeling: Deficiency

- 1) Low Level (LL) Waste crate P02128 incorrectly labeled as "EMPTY."

Supporting Surveillance Results:

- Low Level Waste Crate, P02128 12-19785, "in process," has a "Empty" tag attached but yet the W/RT on the crate indicates that waste has been being accumulated since 4/22/96.

As a result of a discussion with S. Gracia, a CMCAP (Identification no. 96-001194, Plan no. 03) was issued to Waste Generator Services for inaccurately labeling LL waste create, number P02128, as being empty. Reference Rocky Flats Transportation Safety Manual.

Non-Routine Waste Origination Log (NRWOL): Deficiency

- 1) NRWOLs not being completed per procedure 1-I34-WO1103-NRWOL, Non-Routine Waste Origination Log Instructions

Supporting Surveillance Results:

- NRWOL Header Information required by section 6.1, 6.2, and 6.3 is not being completed consistently. NRWOLs reviewed were missing information for Work Performed By, Work Control no., Building, Room, and Work Package Title. There are also other sections which have not been completed (i.e. Waste Contact Date and Process numbers). Ref waste containers D86929, D86862, D86935, P02128
- NRWOL process numbers have not been developed as required by 1-I34-WO1103-NRWOL, Non-Routine Waste Origination Log Instructions. Some NRWOLs have no process numbers on them (Reference D86935, P02128, and D86941). Comment: W/RTs, generated from NRWOLs with no process numbers, have process numbers recorded on them.
- Process number 952020PT is being used for all waste types being generated. This format is not as required by procedure and makes it difficult to determine which item, on the NRWOL, is in the waste container.
- Comment: The manner in which the NRWOLs are being utilized may lead to confusion as to the contents of the waste container. NRWOL forms included with W/RT on most drums have 3 lines completed which describe 3 types of waste. Only one of these waste types is in most of these waste containers. In most cases, through review of waste container documentation, container contents may be determined, but it is not readily apparent. A best management practice may be to line out, initial, and date those wastes not in subject container. A review of 1-I34-WO1103-NRWOL, Non-Routine Waste Origination Log Instructions Indicates that this subject is not adequately addressed. If the format identified in the NRWOL procedure were followed there would be no need for the suggested best management practice identified. This problem was apparent for all waste containers except those missing NRWOLs and NRWOLs missing process numbers
- Waste containers D-86924 and D86941 have no NRWOL to reference for process numbers as required by WO-1102 but yet process numbers are recorded on W/RT.

As a result of a discussion with S. Gracia, a CMCAP (Identification no. 96-001194, Plan no. 02) was issued to Waste Generator Services for NRWOLs not being completed per procedure 1-I34-WO1103-NRWOL, Non-Routine Waste Origination Log Instructions.

Characterization and Packaging: Concern

Concerns have been raised about the generation of uncharacterized waste, both mixed hazardous and radioactive. Through interviews with L. Lewis (RMRS), M. Brooks (RMRS), F. Valenzuela (K-H), K. Lenarcic (DynCorp), and R. M. Richards (K-H) it was determined that RMRS does not have a developed, approved and documented radioactive characterization process for D&D, removal, and strip-out operations. This could result in the generation of wastes packages which may not meet new DOT requirements and may not meet waste acceptance criteria for Waste Repositories. New DOT packaging requirements went into effect April 1, 1996. Waste not properly characterized and packaged will be "Uncertifiable." Waste Repositories require documented and approved "Sampling and Analysis Plans" for the characterization of wastes. It was determined that radioactive characterization is under development. The generation of inadequately characterized waste may result in repackaging at an additional unnecessary expense. Reference Interoffice Memorandum, From B. P. Colby, Radiological Engineering - BPC-036-96, dated May 14, 1994

No deficiency was issued due to this concern.

JFA

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