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EG&G ROCKY FLATS, INC.
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February 2, 1993

93-RF-1362

Distribution

PLANTWIDE DEADLINE FOR THE USE OF THE WASTE/RESIDUE TRAVELER - TGH-108-93

The Waste/Residue Traveler (RF-47386) is designed for use on all containerized waste. This includes Department of Transportation (DOT) drums, overpacks and crates. The application of the traveler has been accomplished in phases starting with radioactive waste inside the Protected Area. The final phase covers non-radioactive waste and is scheduled for the first half of calendar year 1993. **The deadline for applying the Waste/Residue Traveler on all non-radioactive containerized waste is June 1, 1993.** After this date, any active non-radioactive waste container must have the contents documented on the traveler as it is filled. The impact of this deadline will depend on many variables which will be discussed in this letter.

Non-Radioactive Waste Generator Training

- Every person generating non-radioactive containerized waste must be trained and qualified in order to fulfill the packaging and documentation requirements. At the Rocky Flats Plant, non-radioactive containerized waste excludes trash in plastic bags, wastebaskets or dumpsters destined for the sanitary landfill.
- There are two populations of non-radioactive waste generators. The first population consists of personnel lacking the training and qualification to package and document any type of containerized waste. These personnel are required to complete the Waste Generator - Non-Radioactive Waste classroom instruction, course #067-575-01, and to complete the Qualification Standard Package for Waste Generator - Non-Radioactive Waste, #006-577-01. The second population consists of personnel fully trained and qualified to package and document *radioactive* waste and are also responsible for packaging non-radioactive waste. Because of the commonality between the radioactive and non-radioactive waste training requirements, only classroom instruction will be required for these personnel. This applies to individuals credited with fulfilling all requirements for the Waste Generator Qualification - Radioactive Waste, #067-291-01. The classroom instruction required for this population is Waste Generator - Non-Radioactive Waste, course #067-575-01.
- Approved forms for documenting the completion of the training requirements for personnel in the second population will be available by March 1, 1993.

ADMIN RECORD

REVIEWED FOR CLASSIFICATION/UCNI
By B. M. Hoffman u/NU
Date 8-25-93

- Only fully trained and qualified employees are allowed to initiate and complete the Waste/Residue Traveler.

Transition

Planning should begin now for changeover to the use of the Waste/Residue Traveler on or before June 1, 1993. The following guidelines will be helpful in managing the transition.

- The controlling procedure for non-radioactive waste packaging is WP-1027; Non-Radioactive Waste Packaging, which is incorporated into 1-10000-WRM.
- The procedure describing the proper completion of the Waste/Residue Traveler is WO-1102, Waste/Residue Traveler Instructions, which is incorporated into 5-23000-WRP.
- Non-radioactive waste affected by this letter is packaged in DOT drums color-coded as gray, green, black and white, or black and yellow, or is packaged in plywood boxes.
- Full drums/boxes not displaying the Waste/Residue Traveler must be removed from the point of generation into an approved storage, treatment or disposal area prior to June 1, 1993.
- Partially full containers with *known* contents and *controlled* to the satisfaction of the generator or appointed custodian may be managed as follows:
 - Identify the contents using the proper label on the outside.
 - Collect the contents, if possible, into a single plastic bag and identify using the WP-1027 Waste Packaging label. Attach a Waste/Residue Traveler to the top of the container. Enter the pertinent information for the bag on the traveler as described in WO-1102. Sign the traveler. All other deposits to the container will be sequenced in the order they are generated.
 - Attach any previous documentation describing the contents, such as the Drum Log, to the traveler.
 - Continue accumulating waste in the manner prescribed by the new procedures until the container is full.
- Partially full containers with *uncharacterized* contents and *not controlled* by the generator or appointed custodian must be managed as follows:

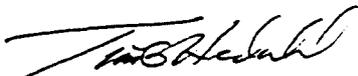
- To the best of your ability, assure that the segregation requirements stated in WP-1027 are satisfied.
- Characterize the contents. This may involve the application of process knowledge and experience, sampling and analysis and/or the use of the building Waste Stream and Residue Identification and Characterization (WSRIC) book. Contact Waste Technical Support at extensions 5877 or 4258 if you need assistance in this process.
- Place controls on the container in order to prevent tampering with the contents.
- Proceed as above with known contents and controlled access to the containerized waste.

Request for Information

It is important to gauge the impact of these new requirements to the resources of the plant. Craig Smith, Waste Regulatory Programs, has been appointed as the program administrator for non-radioactive waste and will coordinate the transition activities including training. Please submit the following information to Craig, Building T130C, fax number 6406, by the close of business on February 15, 1993.

- The number of non-radioactive waste generators for each Associate General Manager, detailed by building or by operation.
- The number of trainers required to accomplish the on-the-job training and qualification for each building or operation.
- The contingency plan for operating without having all waste generators fully qualified by June 1, 1993.

If you have questions, you may contact Craig Smith at extension 6530 or digital pager 3043.



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EG&G Rocky Flats, Inc.

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