

CCP-PO-004

Revision 28

CCP/SRS Interface Document

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PRINTED NAME

APPROVED FOR USE

RECORD OF REVISION

Revision Number	Date Approved	Description of Revision
8	02/08/2002	Made editorial changes and other clarification to 2.0, 3.2.1, 3.38, 4.3.1, 4.4.2 H-P, 4.15 through 4.15.7 also updated Figure 1 & 2. Complete rewrite of 4.10 Transportation.
9	05/09/2002	This document is being revised to correct errors and update the work chart in Figure 1 and 2; Three additional procedures were added to 4.13.3 for the STR to review; Incorporated changes requested by Programs Industrial Safety and Hygiene Document Review to 3.5.6; Incorporated additional comments and changes to section 4.11.1, 4.11.2, and 4.13; Added additional procedure to 4.13.6
10	06/27/2002	Made changes to 3.2.1, 3.5.3 and 4.6.2, Updated Figure 2
11	09/20/2002	Clarification to sections 1.1, 1.2, 3.2, 4.2, 4.3, 4.5, 4.6 and 4.13; Added additional procedures to 4.13.3 and 4.13.6 for the STR and the FSR review; Added steps 3.2.9, 3.3.10, 3.5.7, and 4.6.3.
12	04/08/2003	Revised Steps 3.2.1, step 4.7.2.[E] and step 4.1.3 rewrote Section 4.10, Transportation, added new procedures to the lists in Steps 4.13.3 and 4.13.6, and deleted CCP-TP-057 from Step 4.13.3 since that procedure has been cancelled.
13	08/04/2003	Revision to incorporate corrective actions for CAR-SRS-0004-03 for modification of drums; adding VE to be performed under CCP and to incorporate changes in response to SRS QA Audit Report 2003-AR-26-0006.
14	10/09/2003	Revision to incorporate changes to referenced documents and to add VE as an activity conducted under CCP program.
15	05/24/2004	Revised steps 3.2.1, 4.2.3, 4.3.1[C], 4.5.1[A], and [C], 4.10.1, 4.12.1, 4.13.3, and Figures 1 and 2.
16	09/20/2004	Clarified FGE reporting in Section 3.5.3 and 3.5.4; Clarification to Section 4.11.2 and 4.6.2; and editorial changes. Updates to Figures 1 and 2 in response to audit observation I04-10-O-03.
17	10/27/2004	Revised step 4.1.1 and 4.1.1[A] during SRS recertification audit.
18	02/09/2005	Revised based on the Implementation Plan for CCP Characterization Operations Improvements.

RECORD OF REVISION (Continued)

Revision Number	Date Approved	Description of Revision
19	03/14/2005	SRS request to reflect facility restrictions within the interface document.
20	11/02/2005	Revised steps 4.13.3 and 4.13.4 to be consistent with step 4.9.1 during CCP SRS Recertification Audit A-06-02.
21	03/31/2006	Revised to formalize process for safety basis interactions with new Section 4.16, Authorization Basis (AB) and Configuration Management. Added new Section 4.17, Procurement and clarified Subcontract Technical Representative (STR)/Facility Safety Representative (FSR) review on documents.
22	11/16/2006	The SRS notification threshold limit for PECi was revised to support a request by SRS. Revised to implement the Waste Isolation Pilot Plant Hazardous Waste Facility Permit requirements resulting from the Section 311/Remote-Handled (RH) Permit Modification Request (PMR).
23	01/31/2007	Revised to clarify Authorization Basis and Configuration Management requirements.
24	06/28/2007	Revised for the addition of Remote Handled Waste shipments. Also, added references to the host site notification procedure for characterization results that meet site safety basis notification limits.
25	05/20/2008	Revised to correspond to changes to the Statement of Work 1E8863, Revision 7, <i>Characterization of SRS TRU Waste</i> , incorporated editorial changes, updated the Subcontract Technical Representative (STR) review and concurrence procedure list, and incorporated Remote-Handled (RH) Dose-To-Curie (DTC) Characterization.
26	08/26/2008	Added Headspace Gas Summa [®] sampling and analysis procedures to facilitate sampling at Savannah River Site (SRS).
27	05/22/2009	Per CAR-SRS-0002-09, revised to redefine transportation roles and responsibilities, delineate a process for feedback from Savannah River Site (SRS) to Central Characterization Project (CCP) for procedural discrepancies, and add additional measuring and test equipment (M&TE) requirement.
28	12/29/2010	Minor revision to update references to the <i>Waste Isolation Pilot Plant Hazardous Waste Facility Permit</i> .

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1.0 PURPOSE

This document establishes the interfaces between the Central Characterization Project (CCP) and the Savannah River Site (SRS) for implementing services described in the Statement of Work (SOW) 1E8863, *Characterization of SRS TRU Waste*. Specifically, this document identifies CCP and SRS responsibilities for implementing requirements and deliverables.

This document is provided to clarify and support details contained in the upper tier SOW and program documents. It is not intended to be used in lieu of a task-specific subcontract.

1.1 Background

CCP has been contracted to characterize, certify, and ship transuranic (TRU) wastes located at the SRS to the Waste Isolation Pilot Plant (WIPP) located in Carlsbad, New Mexico. SRS personnel may augment CCP transportation and characterization capabilities, as long as work is performed in accordance with CCP-certified procedures. All services provided by CCP will comply with WIPP requirements.

1.2 Scope

This document applies to all personnel identified on the SRS/CCP organization chart shown in Figure 2, CCP at the Savannah River Site, with responsibilities for supporting services identified in the SOW. Figure 1, WTS Organization, represents the general WTS organization. This document addresses responsibilities associated with TRU waste characterization including interface requirements for the following areas:

- CCP Personnel Training and Qualification
- Container Handling
- Deficiencies
- Visual Examination (VE)
- Nondestructive Examination (NDE)
- Nondestructive Assay (NDA)
- Headspace Gas (HSG) Sampling and Analysis
- Flammable Gas Analysis (FGA)

- Acceptable Knowledge (AK)
- Waste Certification and WIPP Waste Information System (WWIS) Data Entry
- Payload Assembly and Loading
- Transportation
- Measuring and Test Equipment (M&TE)
- Work Standards
- Radiological Characterization (Dose-To-Curie)

As a contractor to SRS, CCP will provide services in accordance with the NM4890139088-TSDF, *Waste Isolation Pilot Plant Hazardous Waste Facility Permit, Attachments C-C6, Waste Analysis Plan (WAP), DOE/WIPP-02-3122, Transuranic Waste Acceptance Criteria for the Waste Isolation Pilot Plant (WIPP WAC) and DOE/WIPP-02-3214, Remote-Handled TRU Waste Characterization Program Implementation Plan (WCPIP)*. This work will be performed under a comprehensive Quality Assurance (QA) Program that meets the requirements defined in DOE/CBFO-94-1012, *U.S. Department of Energy Carlsbad Field Office Quality Assurance Program Document (QAPD)*. CCP will certify waste for disposal in accordance with the certification authority that has been granted by the U.S. Department of Energy (DOE)/Carlsbad Field Office (CBFO) upon successful completion of the certification audit.

SRS maintains overall responsibility for the characterization and certification of the waste for disposal at the WIPP in accordance with the SOW. SRS will also be responsible for reporting conditions or concerns that have or may have safety, health, QA, security, operational, or environmental implications.

SRS has primary responsibility for assuring that requirements for safety (including Radiological Control, Emergency Management, Industrial Safety, and Industrial Hygiene), security, safety basis, and environmental permits are met for CCP activities conducted at SRS.

1.3 Site information

SRS is located in South Carolina. The Environmental Protection Agency (EPA) Facility Number is SC1890008989.

2.0 REQUIREMENTS

This document establishes the CCP/SRS interfaces necessary to implement the applicable requirements of:

- Statement of Work, 1E8863, *Characterization of SRS TRU Waste*
- CCP-PO-001, *CCP Transuranic Waste Characterization Quality Assurance Project Plan*
- CCP-PO-002, *CCP Transuranic Waste Certification Plan*
- CCP-PO-003, *CCP Transuranic Authorized Methods for Payload Control (CCP CH-TRAMPAC)*
- CCP-PO-005, *CCP Conduct of Operations*
- CCP-PO-008, *CCP Quality Assurance Interface with the WTS Quality Assurance Program*
- CCP-PO-026, *CCP Configuration Management Plan*
- CCP-PO-505, *CCP Remote-Handled Transuranic Waste Authorized Methods for Payload Control (CCP RH-TRAMPAC)*
- DOE/CBFO-94-1012, *U.S. Department of Energy Carlsbad Field Office Quality Assurance Program Document*
- DOE/WIPP-06-3336, *CNS 10-160B RH Cask Program Guidance*

3.0 RESPONSIBILITIES

3.1 CCP Site Project Manager (SPM)

- 3.1.1 Receives documentation of required SRS site and Solid Waste Management Facility (SWMF)-specific training.
- 3.1.2 Functions as CCP's primary interface and point of contact between CCP and SRS.
- 3.1.3 Confirms that waste characterization activities are conducted at SRS per SOW requirements and schedule.
- 3.1.4 Confirms sufficient characterization equipment is available to perform the required characterization activities at SRS.
- 3.1.5 Provides the AK Summary Report for SRS waste streams characterized by the CCP to the Subcontract Technical Representative (STR).
- 3.1.6 Provides a list of containers acceptable for characterization and posts on the CCP File Transfer Protocol (ftp) site. This list will be updated routinely.
- 3.1.7 Works in conjunction with SRS operations to confirm reasonable and appropriate through-put of waste containers.
- 3.1.8 Responsible for project level verification and validation of batch data reports (BDRs).
- 3.1.9 Responsible for providing evidence to the STR of Performance Demonstration Program (PDP) participation and successful completion for each operating system.
- 3.1.10 Provide historical operating information to the STR as requested for lessons learned and implementing possible mitigating actions.

3.2 CCP Quality Assurance (QA)

- 3.2.1 Reports to the Washington TRU Solutions, LLC (WTS) QA Manager to maintain functional authority and independence from cost and schedule considerations.
- 3.2.2 Functions as CCP's primary interface and point of contact for QA between CCP and SRS.

- 3.2.3 Validates the Nonconformance Reports (NCRs) generated by CCP personnel.
- 3.2.4 Provides CCP nonconformance documentation to the STR upon request.
- 3.2.5 Provides SRS with semi-annual trending summary reports.
- 3.2.6 Ensures that surveillances of CCP waste characterization and transportation activities at SRS are performed on a periodic basis and surveillance reports are provided to the STR.
- 3.2.7 Provides assistance in generation, disposition, and closure of NCRs and Corrective Action Reports (CARs).
- 3.3 SRS Subcontract Technical Representative (STR)
 - 3.3.1 Functions as the Host site point-of-contact; and is the primary interface between SRS Host site organizations and CCP.
 - 3.3.2 Confirms containers, as specified on the ftp site lists, are provided to CCP in a timely manner.
 - 3.3.3 Provides documented information on containers that have been modified since the original container closure and/or AK has been completed for the containers (e.g., remediation of containers, opening of containers for tag identification, vent, and purge campaigns).
 - 3.3.4 Assures radiological support is available.
 - 3.3.5 Assures documentation of completed SRS site-specific training is delivered to the SPM.
 - 3.3.6 Reviews, provides comments on, and approves procedures per Section 4.16.5.
 - 3.3.7 Provides temperature-controlled environment for waste containers prior to HSG Sampling and Analysis.
 - 3.3.8 Provides adequate record storage facilities and access to the records for the CCP AK source documents as needed.
 - 3.3.9 Provides local AK personnel to support characterization operations as needed.

- 3.3.10 Provides local transportation personnel to support loading and transportation activities as needed.
- 3.3.11 Ensures that periodic QA surveillances of CCP operations by SRS are conducted and reported to CCP.
- 3.3.12 Ensures CCP Vendor Project Manager (VPM) receives quarterly dosimetry and bioassay results on radiation worker-trained CCP personnel.
- 3.3.13 Ensures the provisions of WSRC 5Q, *Radiological Control Manual*, are implemented and compliance is maintained.
- 3.3.14 Ensures that the SRS Authorization Basis (AB) represents the CCP activities and equipment correctly.
- 3.4 SRS First Line Managers for Pad 3 or Pad 4
 - 3.4.1 Confirms "In Process" waste containers are appropriately staged and returned to the CCP characterization process as appropriate.
 - 3.4.2 Confirms "shippable" waste containers are appropriately staged for loading activities.
- 3.5 CCP Vendor Project Manager (VPM)

NOTE

VPM will assume overall CCP responsibility for characterization and loading activities if Mobile Loading Unit Team Lead is not present at the Host site. If present, the Mobile Loading Unit Team Lead will assist VPM with duties associated with loading and shipping.

- 3.5.1 Monitors the List of Qualified Individuals (LOQI) at the beginning of the shift to confirm that only qualified personnel perform waste characterization activities.
- 3.5.2 Provides daily pre-operations briefing.
- 3.5.3 Notifies the CCP SPM if the Host site safety basis notification levels are met.
- 3.5.4 Confirms applicable Material Safety Data Sheets (MSDSs) are maintained and available to support operations.

- 3.5.5 Notifies the STR of any occurrence reports or potential Noncompliance Tracking System-PAAA reportable issues resulting from activities under the CCP certified program.
- 3.5.6 Attends daily SRS Plan of the Day (POD) meeting where safety issues and activities for the day are discussed, facility status is reviewed, and radiological changes are identified.
- 3.5.7 Reviews SRS quarterly dosimetry and bioassay results on radiation worker-trained CCP personnel and ensures the applicable results are provided to the individual CCP employee.
- 3.5.8 Obtains STR and Facility Site Representative (FSR) review and concurrence prior to issuance/approval of an Operator Aid or Standing Order that could affect changes to equipment operation or configuration.
- 3.5.9 Confirms that waste characterization field operations are conducted at SRS per the Interface Document.
- 3.5.10 Provides oversight for project safety, and compliance of CCP personnel at SRS to CCP's certified program requirements.
- 3.5.11 Receives reports of oversight activities from STR and formally responds, as required.
- 3.5.12 Ensures CCP personnel comply with SRS integrated work management, environmental, safety, and security requirements.
- 3.5.13 Controls access of CCP personnel including its subcontractors to the field. Requests site access for visitors.
- 3.5.14 Functions as CCP's primary interface and point-of-contact between CCP and SRS for field operations.
- 3.5.15 Performs training and briefing of personnel in regards to procedural changes.
- 3.5.16 Works with CCP Configuration Management group to ensure that CCP-provided equipment is maintained under a CCP-approved Configuration Management Program.
- 3.5.17 Ensures that new additions to and/or modifications made to CCP-provided facilities and/or equipment are submitted to the STR as soon as practicable and approvals are received prior to implementation.

- 3.6 SRS Facility Safety Representative (FSR)
 - 3.6.1 Reviews, provides comments on, and approves technical operating procedures listed in Section 4.16.7.
 - 3.6.2 Reviews, provides comments on, and approves any new technical operating procedures written for use at SRS.
 - 3.6.3 Performs Unreviewed Safety Question (USQ) activities as required to document CCP activities and equipment into the SRS AB.
- 3.7 CCP Waste Certification Official (WCO)
 - 3.7.1 Obtains from the CCP SPM the approved Waste Stream Profile Form (WSPF) for applicable containers to be certified.
 - 3.7.2 Validates the CCP WWIS Data Spreadsheet.
 - 3.7.3 Certifies the data for the container(s) to be certified as identified on the CCP WWIS Data Spreadsheet.
 - 3.7.4 Submits the container data from the CCP WWIS Data Spreadsheet to the WWIS Characterization and Certification Modules as applicable.
- 3.8 CCP Transportation Certification Official (TCO) or Mobile Loading Unit Team Lead
 - 3.8.1 Provides oversight to CCP Transportation personnel for payload and Overpack assembly and TRUPACT/HalfPACT loading.
 - 3.8.2 Certifies payloads for transportation to and disposal at WIPP.
 - 3.8.3 Builds payloads from certified containers and Overpacks provided by WCOs in WWIS.
 - 3.8.4 Builds shipments from approved payloads in WWIS.
 - 3.8.5 Ensures CCP Transportation personnel are trained and qualified to perform WIPP-compliant contact-handled (CH) TRU waste packaging and loading operations at the Host site prior to commencement of work activities and are listed on the LOQI.
 - 3.8.6 Confirms that waste transportation activities are conducted at SRS per the Interface Document.

4.0 INTERFACE

4.1 Training

4.1.1 CCP personnel will be trained and qualified to WIPP requirements in accordance with CCP-QP-002, *CCP Training and Qualification Plan*. Additionally, CCP personnel assigned to the SRS site must complete required SRS and SWMF-specific training. Both the WIPP (technical) training and SRS/SWMF-specific training must be completed prior to the individual being assigned to perform independent work on the SRS site.

[A] An LOQI will be monitored by the CCP VPM to confirm CCP personnel are not assigned to perform work if they are not in compliance with training and qualification requirements.

4.1.2 The STR will provide the SRS site-specific training documentation to the SPM.

4.1.3 SRS personnel who perform work under CCP procedures will be trained to meet the requirements found in CCP-QP-002 by either the CCP VPM or the training organization. CCP Training and the SPM will then evaluate and approve the training in accordance with CCP-QP-002.

4.1.4 To ensure that notifications are made by offsite review personnel (e.g., Independent Technical Reviewer [ITR], NDA Expert Analyst [EA], SPM) for Host site safety basis notification levels, the Host site procedure SW15.3-SOP-CNP-01 will be included in the appropriate qualification cards. Any revisions to the Host site procedure will be issued as required reading by CCP Training.

4.1.5 The STR will notify the SPM of any revisions to SW15.3-SOP-CNP-01.

4.2 Container Management

4.2.1 SRS will provide waste managed as TRU waste in containers to the CCP characterization area.

4.2.2 SRS is responsible for providing documented information to the SPM on any modification to the container after original container closure and/or AK has been completed.

4.2.3 SRS is responsible for container movement and storage and implementing vehicle access controls.

- 4.2.4 The SPM will review the documented information of modified containers and will notify the STR when the containers are approved for entrance into the CCP characterization process.
 - 4.2.5 CCP is responsible for container management throughout the CCP characterization process including heated storage prior to HSG Sampling. CCP will perform container management in accordance with CCP-TP-035, *CCP Container Management*, and CCP-TP-509, *CCP Remote-Handled Transuranic Container Tracking*.
 - 4.2.6 SRS will provide the dose rate and surface contamination information to CCP records personnel necessary to certify the containers for disposal.
- 4.3 Deficiencies
- 4.3.1 CCP Identified Deficiencies
 - [A] If personnel identify a non-conformant condition associated with a waste container during the CCP characterization or certification process, CCP personnel will initiate an NCR in accordance with CCP-QP-005, *CCP TRU Nonconforming Item Reporting and Control*.

NOTE

In some cases, SRS will perform the work required to resolve deficiencies identified in CCP NCRs and will initiate internal documentation as required by the SRS program. However, the CCP NCRs will remain open and CCP NCR Hold Tags will remain on the affected containers until resolution of the NCR condition has been confirmed by CCP, if applicable, under its program. At that point, CCP will close the NCRs and remove the NCR tags.

- [B] CCP will provide NCR data to SRS.
- [C] As shown in Section 3.5, CCP will notify the STR immediately of occurrence reports or potential Price-Anderson Amendment Act (PAAA) issues resulting from the CCP scope of work.

4.3.2 SRS Identified Deficiencies

- [A] If SRS personnel identify a non-conformant condition during container movement or handling (e.g., missing container identification tag, duplicate container number), SRS personnel will initiate nonconformance documentation in accordance with the SRS QA Program.
- [B] The STR will ensure a copy of any NCR affecting the CCP program is provided to the SPM for incorporation into the CCP Nonconformance Tracking System (as required).
- [C] The STR will notify the CCP SPM of any procedure deficiencies, identified by SRS personnel, which relate to characterization activities.
- [D] The STR will notify the TCO or Mobile Loading Unit Team Lead of any procedure deficiencies, identified by SRS personnel, which relate to payload assembly or loading activities.

4.4 Visual Examination (VE)

- 4.4.1 VE requirements for certification of TRU waste containers will be performed in accordance with CCP procedures using facilities provided by SRS.

4.5 Nondestructive Examination (NDE)

- 4.5.1 Containers found with prohibited items or needing actions (e.g., vent and purge) will be identified with an NCR.
 - [A] The disposition may be to continue the container through the characterization process; such that the container is remediated using a CCP-approved procedure.
 - [B] The container may be returned to SRS for disposition as discussed in Section 4.3.
- 4.5.2 If Real-Time Radiography (RTR) results meet the Host site safety basis notification levels identified in the Host site procedure (SW15.3-SOP-CNP-01), CCP RTR personnel will immediately make notifications as required.

- 4.5.3 If later reviews (e.g., ITR, SPM) identify that any of the Host site safety basis notification levels identified in the Host site procedure (SW15.3-SOP-CNP-01) have been met, notifications will immediately be made.
- 4.6 Nondestructive Assay (NDA)
 - 4.6.1 SRS will provide support for CCP participation in the NDA PDP. This support includes maintaining trained PDP coordinators, preparation of the test containers, delivery of the containers to the CCP NDA equipment, and responsibility for PDP source control. The SRS support will be coordinated by the STR.
 - 4.6.2 If NDA results meet the Host site safety basis notification levels identified in the Host site procedure (SW15.3-SOP-CNP-01), CCP NDA personnel will immediately make notifications as required. If notification levels are reached, NDA EA assay results will be performed and the resulting conclusions will be communicated both verbally and in writing to the STR, SPM, and the CCP VPM within 24 hours of the first normal work day following the assay.
 - 4.6.3 If later reviews (e.g., ITR, NDA EA, SPM) identify that any of the Host site safety basis notification levels identified in the Host site procedure (SW15.3-SOP-CNP-01) have been met, notifications will immediately be made.
- 4.7 Radiological Characterization
 - 4.7.1 The Host site will provide technical support for radiological characterization efforts based on the use of AK for stored remote-handed (RH) TRU waste.
 - 4.7.2 CCP will provide qualified personnel, including Host site personnel, to perform radiological characterization activities.
 - 4.7.3 The Host site will provide support for the CCP for performing calibration of Radiological Characterization instrumentation. This support includes delivery of surrogate drums and source control as needed.
- 4.8 Headspace Gas (HSG) Sampling and Analysis
 - 4.8.1 SRS will provide a temperature-controlled environment (minimum 65°F) for waste containers for a minimum of 72 hours prior to sampling.

- 4.8.2 SRS will be responsible for providing the calibrated instrumentation needed to monitor the temperature requirements.
 - 4.8.3 CCP will perform HSG Sampling and Analysis using SUMMA[®] HSG sampling with analysis of the SUMMA[®] samples performed by the INL Environmental Chemistry Laboratory (ECL) under a separate DOE/CBFO-certified program.
 - 4.8.4 If HSG results meet the Host site safety basis notification levels identified in the Host site procedure (SW15.3-SOP-CNP-01), CCP HSG personnel will immediately make notifications.
 - 4.8.5 If later reviews (e.g., ITR, SPM) identify that any of the Host site safety basis notification levels identified in the Host site procedure have been met, notifications will immediately be made (SW-15.3-SOP-CNP-01).
 - 4.8.6 CCP will review containers that exceed 500 parts per million by volume (ppmv) against the current revision of CCP-PO-003, *CCP Transuranic Authorized Methods for Payload Control (CCP CH-TRAMPAC)*, and CCP-PO-505, *CCP Remote-Handled Transuranic Waste Authorized Methods for Payload Control (CCP RH-TRAMPAC)*, for determination of suitability for shipment.
- 4.9 Flammable Gas Analysis (FGA)
- 4.9.1 FGA is for transportation only and will be performed using approved DOE/WIPP procedures by personnel trained under the CCP Qualification Program.
- 4.10 Gas Generation Testing (GGT)
- 4.10.1 CCP will perform GGT sampling and analysis using GGT canisters in accordance with CCP-TP-083, *CCP Heated Gas Test Canister Operations*, and CCP-PO-016, *CCP Gas Generation Testing Program Quality Assurance Project Plan*.
 - 4.10.2 CCP will be responsible for maintenance and repairs of the GGT canisters and instrumentation per CCP-TP-089, *CCP Mobile Gas Generation Testing Sampling System (MGSS) Sampling Operations*.

4.11 Acceptable Knowledge (AK)

4.11.1 CCP records personnel in Carlsbad will maintain the original of the AK source documents necessary to support the AK Summary Report in accordance with the WAP and the QAPD.

4.11.2 CCP AK personnel will perform and document the AK collection, reporting, and confirmation in accordance with CCP-TP-005, *CCP Acceptable Knowledge Documentation*. CCP shall submit the AK Summary Report for SRS review and concurrence. As warranted, the STR will provide written comments to be dispositioned before document approval. Upon satisfactory disposition of comments, the STR will provide written concurrence of the AK Summary Report on the basis of accuracy of technical data presented and reasonableness of interpretations and conclusions drawn from the technical data.

4.11.3 SRS AK personnel will assist, as needed, CCP AK personnel with AK compilation, confirmation, discrepancy resolution, or AK reassessment of source documents.

4.12 Waste Certification and WWIS Data Entry

4.12.1 The WCO will transmit characterization and certification data using the WWIS and procedure CCP-TP-030, *CCP TRU Waste Certification and WWIS Data Entry*, for CH waste and CCP-TP-530, *CCP RH TRU Waste Certification and WWIS Data Entry*, for RH waste.

4.12.2 The SPM shall submit the Waste Stream Profile Package for SRS concurrence before final approval and submittal to CBFO. The STR will provide written concurrence on the basis of continued compliance with procedures and programs and CBFO certification of the CCP program.

4.12.3 The WCO will document and certify that all TRU waste payload containers prepared from the CCP processes for WIPP meet all of the requirements of the WAC.

4.12.4 The WCO will provide the Transportation Certification Official (TCO) with all WAC information necessary to certify the payload for transportation.

4.13 Transportation – Contact-Handled (CH) Waste/Remote-Handled (RH) Waste

4.13.1 CH Waste

- [A] SRS will provide and maintain Transuranic Package Transporter Model II (TRUPACT-II) Loading facilities.
- [B] CCP Transportation will provide technical resources, TCOs, and qualified personnel to perform the transportation certification, preparation of the shipment, and loading of the waste for shipment.
- [C] SRS will provide the equipment and trained personnel required to handle waste containers for payload assembly and TRUPACT-II loading operations.
- [D] CCP Transportation will provide trained personnel required to handle waste containers for payload assembly and TRUPACT-II loading operations.
- [E] SRS will provide manifesting, marking, labeling, and placarding of the shipments in accordance with 40 Code of Federal Regulations (CFR) and 49 CFR requirements and in accordance with site-specific procedures.
- [F] CCP Transportation will provide documentation to the STR certifying the waste for shipment according to CCP procedures.
- [G] SRS will coordinate the shipment, including providing prerequisite surveys.

4.13.2 RH Waste

- [A] SRS will provide and maintain RH TRU 72-B or RH Chem-Nuclear Systems (CNS) 10-160B transportation cask loading facilities.
- [B] CCP Transportation will provide technical resources and personnel to perform the transportation certification, preparation of the shipment, and loading of the waste for shipment.

- [C] SRS will provide the equipment and trained personnel required to handle waste containers for payload assembly and RH TRU 72-B or RH CNS 10-160B loading operations.
- [D] CCP Transportation will provide trained personnel required to handle waste containers for payload assembly and cask loading operations.
- [E] SRS will provide manifesting, marking, labeling, and placarding of the shipments in accordance with 40 CFR and 49 CFR requirements and in accordance with site-specific procedures.
- [F] CCP Transportation will provide documentation to the STR certifying the waste for shipment according to CCP procedures.
- [G] SRS will coordinate the shipment, including providing prerequisite surveys.

4.14 Measuring and Test Equipment (M&TE)

- 4.14.1 CCP operations personnel will provide a list of equipment that requires calibration to the STR and the SRS M&TE Custodian. The list of equipment requiring calibration will include such things as weight scales, infrared thermometers, temperature data loggers, electronic calibrators, digital readouts, and pressure transducers.
- 4.14.2 For Host site M&TE furnished for use in the CCP program, the Host site STR/Designee will provide an equipment list to the CCP VPM and CCP M&TE Custodian, and a notification when M&TE are being added, deleted, or fail recalibration.
- 4.14.3 SRS will provide National Institute of Science and Technology (NIST) traceable calibration services for specified M&TE to the CCP. SRS will maintain records on M&TE calibration in accordance with the *Waste Isolation Pilot Plant Hazardous Waste Facility Permit*, Section C-4a (7) and Table C-7, and the SRS Records Inventory and Disposition Schedule (RIDS). Copies of the Certificates of Calibration will be provided to the CCP VPM and CCP M&TE Custodian.
- 4.14.4 The STR will make calibration documentation and process available as needed for internal and external audits.

4.15 Work Standards

4.15.1 CCP operations personnel will work under applicable SRS Manual 8Q procedures.

4.15.2 CCP operations personnel will work under CCP-approved procedures for waste characterization and transportation activities and SRS-approved work packages for non-waste characterization activities (e.g., equipment repairs).

4.15.3 SRS maintenance may assist CCP with equipment maintenance. All activities will meet CCP configuration and maintenance requirements and be authorized by the CCP VPM.

4.15.4 CCP operations personnel will operate in accordance with CCP-PO-005, *CCP Conduct of Operations*.

4.15.5 CCP operations personnel will comply with the SRS Waste Management Area Project Safety and Health Plan for Hazardous Waste Operations as it pertains to CCP activities.

4.16 Procedures

4.16.1 Editorial or minor changes may be made to all CCP documents except CCP-PO-001, *CCP Transuranic Waste Characterization Quality Assurance Project Plan*, CCP-PO-002, *CCP Transuranic Waste Certification Plan*, CCP-PO-003, CCP-PO-505, and CCP-QP-001, *CCP Graded Approach*, without the same level of review and approval as the original document.

4.16.2 New procedures developed by CCP for use at the Host site, shall be evaluated by the Host site STR/Designee to determine if the procedure shall be added to the Host site review lists defined below.

NOTE

If operations no longer warrant use of any document listed in Sections 4.16.3, 4.16.6, or 4.16.7, the SPM may determine that the STR/FSR review is not applicable or a "Notify Only" is appropriate. If the document is reinstated, STR/FSR review will be required prior to site use.

- 4.16.3 The STR will review or designate the appropriate reviews of the CCP procedures listed in Section 4.16.5, and forward written comments to CCP Document Control in accordance with CCP-QP-010 for resolution.
- 4.16.4 The SPM will confirm that the STR's written comments are resolved with STR concurrence prior to proceeding with CCP operations.
- 4.16.5 The following procedures and all revisions to these procedures will be provided to the STR for review and concurrence:
- All associated Acceptable Knowledge Summary Reports
 - CCP-CM-001, *CCP Equipment Change Authorization and Documentation*
 - CCP-CM-007, *CCP Isotopic System Gamma Qualitative and Quantitative Drum Counter with Isotopics (IQ3) Scanner (Equipment #NDA-IQ3-01) Equipment Description*
 - CCP-CM-008, *CCP In Situ Object Counting System (ISOCS) (Equipment #NDA-ISOCS-01) Equipment Description*
 - CCP-CM-013, *CCP Transportation HSG Only – Flammable Gas Analysis (FGA) (Equipment # HSG-FGA-01) (Equipment # HSG-FGA-02) (Equipment # HSG-FGA-03) (Equipment # HSG-FGA-04) Equipment Description*
 - CCP-CM-019, *CCP Real-Time Radiography Unit #4 (RTR-4) (Equipment #NDE-RTR-04) Equipment Description*
 - CCP-HSP-014, *Health and Safety Program Implementation for CCP*
 - CCP-PO-004, *CCP/SRS Interface Document*
 - CCP-PO-026, *CCP Configuration Management Plan*

- CCP-QP-005, *CCP TRU Nonconforming Item Reporting and Control*
- CCP-TP-011, *CCP Radiography Inspection Operating Procedure*
- CCP-TP-033, *CCP Shipping of CH TRU Waste*
- CCP-TP-035, *CCP Container Management*
- CCP-TP-046, *CCP Mobile IQ3 System Calibration Procedure*
- CCP-TP-047, *CCP Mobile IQ3 Gamma Scanner Operation*
- CCP-TP-050, *CCP Mobile Segmented Gamma Scanner Calibration Procedure*
- CCP-TP-051, *CCP Mobile Segmented Gamma Scanner Operation*
- CCP-TP-053, *CCP Standard Real-Time Radiography (RTR) Inspection Procedure*
- CCP-TP-054, *CCP Adjustable Center of Gravity Lift Fixture Preoperational Checks and Shutdown*
- CCP-TP-055, *CCP Varian Porta-Test Leak Detector Operations*
- CCP-TP-066, *CCP Radiography Screening Procedure for Prohibited Items*
- CCP-TP-086, *CCP CH Packaging Payload Assembly*
- CCP-TP-087, *CCP Scale Operations*
- CCP-TP-093, *CCP Sampling of TRU Waste Containers*
- CCP-TP-106, *CCP Headspace Gas Sampling Batch Data Report Preparation*
- CCP-TP-113, *CCP Standard Contact-Handled Waste Visual Examination*
- CCP-TP-136, *CCP Standardized Prohibited Item Remediation*

- CCP-TP-139, *CCP In Situ Object Counting System Nondestructive Assay Operating Procedure*
- CCP-TP-145, *CCP RTR #4 Operating Procedure*
- CCP-TP-189, *CCP Box Segmented Gamma System (BSGS) Operating Procedure*
- CCP-TP-190, *CCP Box Segmented Gamma System (BSGS) Calibration Procedure*
- CCP-TP-191, *CCP Box Neutron Assay System (BNAS) Operating Procedure*
- CCP-TP-192, *CCP Box Neutron Assay System (BNAS) Calibration Procedure*
- CCP-TP-504, *CCP Dose-to-Curie Survey Procedure*
- CCP-TP-505, *CCP Removable Lid Canister Loading*
- CCP-TP-507, *CCP Shipping of Remote-Handled Transuranic Waste*
- CCP-TP-508, *CCP RH Standard Real-Time Radiography Inspection Procedure*
- CCP-TP-509, *CCP Remote-Handled Transuranic Container Tracking*
- CCP-TP-554, *CCP Remote-Handled Grapple Pre-Operational Checks and Operation*

4.16.6 The following documents will be sent to the STR as “Notify Only” during the review process:

- CCP-PO-001, *CCP Transuranic Waste Characterization Quality Assurance Project Plan*
- CCP-PO-002, *CCP Transuranic Waste Certification Plan*
- CCP-PO-003, *CCP Transuranic Authorized Methods for Payload Control (CCP CH-TRAMPAC) (if CCP transportation program used by SRS)*

- CCP-PO-005, *CCP Conduct of Operations*
- CCP-PO-006, *CCP Conduct of Operations Matrix*
- CCP-PO-008, *CCP Quality Assurance Interface with the WTS Quality Assurance Program*
- CCP-PO-505, *CCP Remote-Handled Transuranic Waste Authorized Methods for Payload Control (CCP RH-TRAMPAC)*
- CCP-QP-002, *CCP Training and Qualification Plan*
- CCP-QP-006, *CCP Corrective Action Reporting and Control*
- CCP-QP-008, *CCP Records Management*
- CCP-QP-010, *CCP Document Preparation, Approval and Control*
- CCP-TP-005, *CCP Acceptable Knowledge Documentation*
- CCP-TP-048, *CCP Mobile IQ3 System Data Reviewing, Validating and Reporting Procedure*
- CCP-TP-050, *CCP Mobile Segmented Gamma Scanner Calibration Procedure*
- CCP-TP-052, *CCP Mobile Segmented Gamma Scanner Data Reviewing, Validating and Reporting*
- CCP-TP-055, *CCP Varian Porta-Test Leak Detector Operations*

4.16.7 The following procedures, and all revisions to these procedures, will be provided to the FSR for review and approval in accordance with CCP-QP-010:

- CCP-CM-001, *CCP Equipment Change Authorization and Documentation*
- CCP-CM-007, *CCP Isotopic System Gamma Qualitative and Quantitative Drum Counter with Isotopics (IQ3) Scanner (Equipment #NDA-IQ3-01) Equipment Description*
- CCP-CM-008, *CCP In Situ Object Counting System (ISOCS) (Equipment #NDA-ISOCS-01) Equipment Description*

- CCP-CM-013, *CCP Transportation HSG Only – Flammable Gas Analysis (FGA) (Equipment # HSG-FGA-01) (Equipment # HSG-FGA-02) (Equipment # HSG-FGA-03) (Equipment # HSG-FGA-04) Equipment Description*
- CCP-CM-019, *CCP Real-Time Radiography Unit #4 (RTR-4) (Equipment #NDE-RTR-04) Equipment Description*
- CCP-PO-004, *CCP/SRS Interface Document*
- CCP-PO-026, *CCP Configuration Management Plan*
- CCP-TP-011, *CCP Radiography Inspection Operating Procedure*
- CCP-TP-033, *CCP Shipping of CH TRU Waste*
- CCP-TP-035, *CCP Container Management*
- CCP-TP-046, *CCP Mobile IQ3 System Calibration Procedure*
- CCP-TP-047, *CCP Mobile IQ3 Gamma Scanner Operation*
- CCP-TP-048, *CCP Mobile IQ3 System Data Reviewing, Validating and Reporting Procedure*
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- CCP-TP-051, *CCP Mobile Segmented Gamma Scanner Operation*
- CCP-TP-052, *CCP Mobile Segmented Gamma Scanner Data Reviewing, Validating and Reporting*
- CCP-TP-053, *CCP Standard Real-Time Radiography (RTR) Inspection Procedure*
- CCP-TP-054, *CCP Adjustable Center of Gravity Lift Fixture Preoperational Checks and Shutdown*
- CCP-TP-055, *CCP Varian Porta-Test Leak Detector Operations*
- CCP-TP-066, *CCP Radiography Screening Procedure for Prohibited Items*

- CCP-TP-086, *CCP CH Packaging Payload Assembly*
- CCP-TP-087, *CCP Scale Operations*
- CCP-TP-093, *CCP Sampling of TRU Waste Containers*
- CCP-TP-106, *CCP Headspace Gas Sampling Batch Data Report Preparation*
- CCP-TP-113, *CCP Standard Contact-Handled Waste Visual Examination*
- CCP-TP-136, *CCP Standardized Prohibited Item Remediation*
- CCP-TP-139, *CCP In Situ Object Counting System Nondestructive Assay Operating Procedure*
- CCP-TP-145, *CCP RTR #4 Operating Procedure*
- CCP-TP-189, *CCP Box Segmented Gamma System (BSGS) Operating Procedure*
- CCP-TP-190, *CCP Box Segmented Gamma System (BSGS) Calibration Procedure*
- CCP-TP-191, *CCP Box Neutron Assay System (BNAS) Operating Procedure*
- CCP-TP-192, *CCP Box Neutron Assay System (BNAS) Calibration Procedure*
- CCP-TP-193, *CCP Data Reviewing, Validating, and Reporting Procedure for the Nondestructive Assay Box Counters*
- CCP-TP-504, *CCP Dose-to-Curie Survey Procedure for Remote-Handled Transuranic Waste*
- CCP-TP-505, *CCP Removable Lid Canister Loading*
- CCP-TP-507, *CCP Shipping of Remote-Handled Transuranic Waste*
- CCP-TP-508, *CCP RH Standard Real-Time Radiography Inspection Procedure*

- CCP-TP-509, *CCP Remote-Handled Transuranic Container Tracking*
- CCP-TP-554, *CCP Remote-Handled Grapple Pre-Operational Checks and Operation*

4.17 Documents

4.17.1 Documents listed in this section, which are provided from one organization to the other as information copies, may be transmitted via memo, fax, e-mail, formal correspondence, or as requested by SPM or STR. Documents identified as QA records will be transmitted via CCP-QP-008, *CCP Records Management*.

4.17.2 Documents/Electronic Data to be provided to SRS by CCP include:

- [A] List of equipment requiring calibration.
- [B] Electronic NCR data and copies of CARs, as applicable.
- [C] Copies of the NDA Results for containers requiring notification per Section 4.6.2.
- [D] Copies of AK Summary Reports.
- [E] Data Quality Objective (DQO) Reconciliation Documentation, as requested by SRS.
- [F] Cross-reference of containers to BDRs, as requested by SRS.
- [G] HSG Summary Data Reports, as requested by SRS.
- [H] Tentatively Identified Compound (TIC) Listings and evaluations, as requested by SRS.

4.17.3 Documents to be provided to CCP by SRS include:

- [A] Copies of calibration certifications.
- [B] Documentation of training completion for CCP personnel for training received from SRS.
- [C] Documentation of information for container modifications.
- [D] AK source documentation requested by CCP.

[E] Radiological dose rate and surface contamination results on waste containers as needed to support WWIS data entry.

4.18 Radioactive Sealed Sources

4.18.1 Radioactive sealed sources, whether owned by CCP or SRS, will be controlled under applicable requirements of the SRS Radiological Control Program for sealed sources.

4.18.2 SRS will provide support for leak testing, labeling, and inventory control for sealed sources owned and used by CCP NDA processes.

4.18.3 SRS may provide radioactive sealed sources to the CCP NDA processes when required for use in meeting NDA QAOs.

4.18.4 CCP will submit written request to SRS to bring any sealed radioactive source to SRS. The request will be accompanied by a copy of the applicable Radioactive Materials License. SRS will provide written permission to CCP to bring sealed radioactive sources to SRS upon receipt and approval of CCP's written request.

4.18.5 CCP will provide day-to-day control of the sources it owns and uses in accordance with requirements in the SRS Radiological Control Program.

4.19 Authorization Basis (AB) and Configuration Management

4.19.1 The Host site has primary responsibility to ensure that CCP equipment and processes have been appropriately considered within the DOE-approved Host site documented safety analysis.

4.19.2 CCP has primary responsibility to control operations and equipment configurations to ensure compliance with CCP and Host site procedures that protect the personnel, public, and environment.

4.19.3 For CCP-provided equipment, CCP will provide the documentation necessary for SRS to perform the evaluation against its safety analysis. This documentation may include health and safety plans, hazard assessments, system descriptions, equipment drawings, or other information deemed necessary through mutual agreement between CCP and SRS.

4.19.4 For Host site-provided equipment, CCP will review operational and AB documentation to ensure the safety of CCP personnel while operating the equipment.

4.19.5 All changes to equipment operated by CCP will be controlled by the Host site Work Control Program to ensure appropriate Host site AB evaluations are conducted, and associated controls established.

4.19.6 CCP has primary responsibility to ensure changes to equipment are in accordance with CCP-CM-001, *CCP Equipment Change Authorization and Documentation*.

4.20 Notification

4.20.1 The Host site has primary responsibility to notify CCP when there are changes in the Host site facilities used by CCP for characterization activities or changes that may impact operations.

4.20.2 The Host site has primary responsibility to notify CCP when there are changes to policies, processes, or procedures that may affect CCP characterization activities or operations.

4.20.3 CCP has primary responsibility to notify the Host site when there are configuration changes to CCP or CCP vendor-owned equipment.

4.20.4 The Host site has primary responsibility to notify CCP when repairs or modifications are needed on the CH or RH transportation trailers or packaging equipment (TRUPACT-II, HalfPACTs, etc.) or casks (RH TRU 72-B or RH CNS 10-160B).

4.20.5 CCP is responsible for performing or coordinating repairs and modifications to the RH TRU 72-B or RH CNS 10-160B, TRUPACT-IIs, HalfPACTs, CH or RH transportation trailers.

4.21 Procurement

4.21.1 SRS is shown as a supplier of procurement services on the WTS Qualified Suppliers List (QSL). SRS may procure, inspect, and perform receipt inspection of whatever items are listed in the most current WTS QSL for the CCP scope of work (this is presently limited to 55-gallon drums and container filter vents). SRS will perform these activities in accordance with its QSL-accepted program.

- 4.22 Occurrence Reporting and Processing System (ORPS) and Price-Anderson Amendment Act (PAAA)
 - 4.22.1 Both SRS and CCP maintain the responsibility for reporting potential PAAA issues resulting from waste certification or safe operation of characterization activities (e.g., Technical Safety Requirements, Radiation Safety, Industrial Safety, Industrial Hygiene, Maintenance, Lockout/Tagout, Conduct of Operations) of TRU waste by CCP at SRS. This includes filing any ORPS reports resulting from the characterization activities of TRU waste by CCP.
 - 4.22.2 Both SRS and CCP shall invite the other to participate in the investigation of any waste characterization event that results in an ORPS or PAAA report.
 - 4.22.3 Both SRS and CCP shall support and participate in investigations when CCP characterization activities result in an ORPS or PAAA report.

5.0 RECORDS

5.1 Records generated during the performance of this procedure are maintained as QA records in accordance with CCP-QP-008. The records are the following:

5.1.1 QA/Nonpermanent Records

[A] Written comments from SRS (e.g., memo, e-mail)

Figure 1. WTS Organization

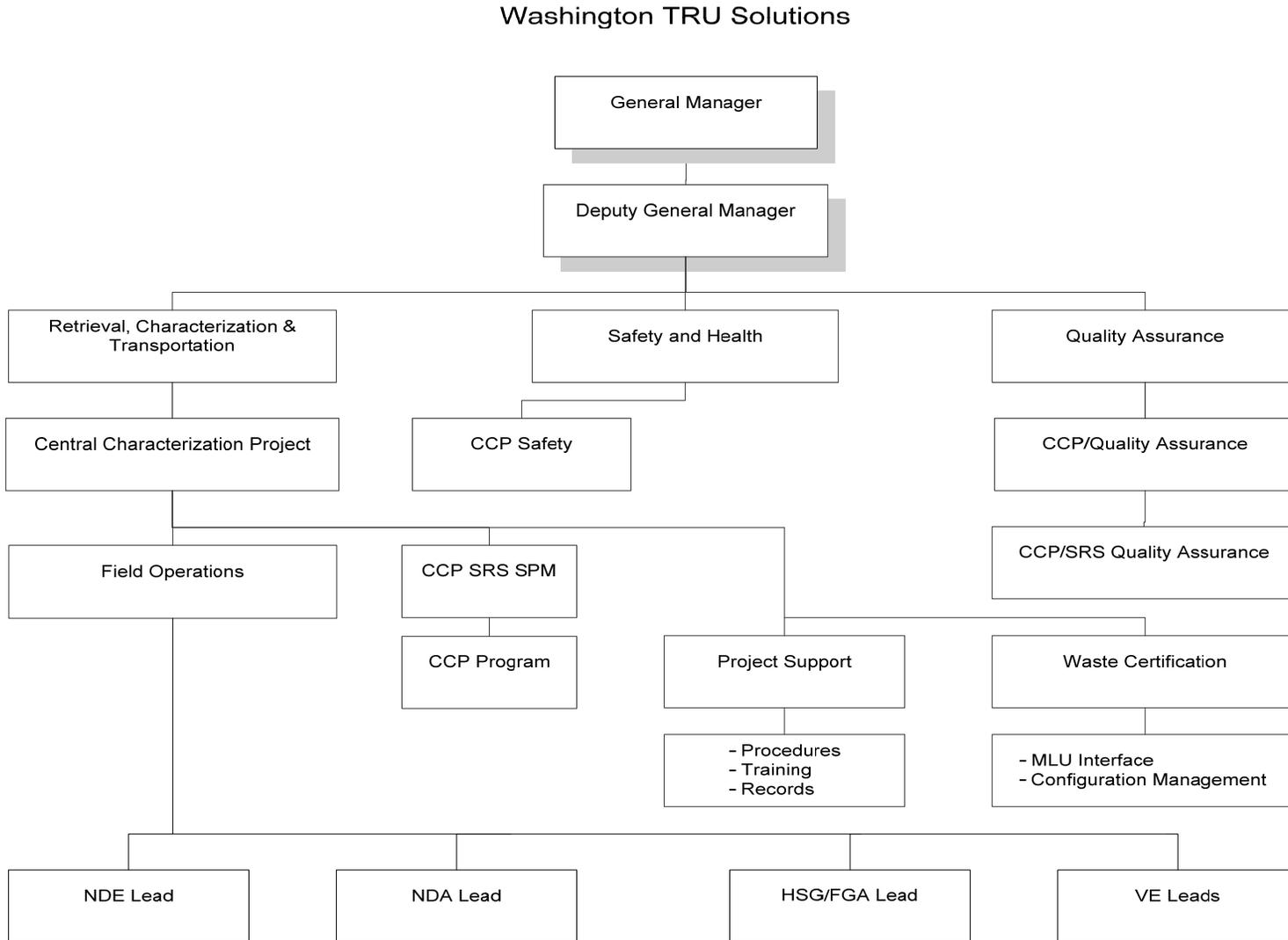


Figure 2. CCP at the Savannah River Site

