

CCP-PO-011

Revision 4

CCP/CH2M HILL Plateau Remediation Company Interface Document

EFFECTIVE DATE: 03/02/2011

Larry Porter

PRINTED NAME

APPROVED FOR USE

RECORD OF REVISION

Revision Number	Date Approved	Description of Revision
0	07/22/2009	Initial issue.
1	12/22/2009	Revised to incorporate processing drums using Real-Time Radiography (RTR) and Nondestructive Assay (NDA). Also included phase two Transportation requirements.
2	07/27/2010	Revised to incorporate intersite shipment procedures and editorial changes.
3	10/05/2010	Revised to update references to the <i>Waste Isolation Pilot Plant Hazardous Waste Facility Permit</i> and site specific beryllium (Be) program.
4	03/02/2011	Revised to incorporate the High Energy Real-time Radiography (RTR) Operating Procedure, SuperHENC procedures, and other updates.

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1.0 PURPOSE

This document establishes the interfaces between the Washington TRU Solutions, LLC. (WTS) Central Characterization Project (CCP) and CH2M HILL Plateau Remediation Company, LLC. (CHPRC) for implementing services described in the Memorandum of Agreement, MOA-CHPRC-CCP-2011, *Performance of Transuranic Waste Characterization and Certification Activities at Hanford*. Specifically, this document identifies CCP and CHPRC responsibilities for implementing requirements and deliverables associated with contact-handled (CH) transuranic (TRU) waste.

This document is provided to clarify and support details contained in Memorandum of Agreement (MOA) Number MOA-CHPRC-CCP-2011, Rev. 0 between CHPRC and Washington TRU Solutions Central Characterization Project, *Performance of Transuranic Waste Characterization and Certification Activities at Hanford* and program documents.

This Interface Agreement is subordinate to the current respective prime contracts and the previously noted MOA. The terms and conditions contained in the prime contracts and other agreements applicable to the respective parties shall prevail over any conflicts and conflicting terms and conditions herein.

1.1 Background

CCP has been contracted by the U.S. Department of Energy (DOE) Carlsbad Field Office (CBFO) to characterize and certify TRU wastes being packaged at Hanford CHPRC facilities or other Hanford Site locations for disposal at the Waste Isolation Pilot Plant (WIPP) located in Carlsbad, New Mexico. CCP has also been contracted to perform intersite shipments of Hanford 85-gallon containers to Advanced Mixed Waste Treatment Plant (AMWTP). All services provided by CCP will comply with WIPP or AMWTP requirements, and procedures approved for use at Hanford.

1.2 Scope

This document addresses responsibilities associated with TRU waste characterization including interface requirements for the following areas:

- Positions and Responsibilities
- CCP Personnel Training and Qualification
- Container Management

- Deficiencies
- Visual Examination (VE)
- Nondestructive Examination (NDE)
- Headspace Gas (HSG) Sampling
- Flammable Gas Analysis (FGA)
- Nondestructive Assay (NDA)
- Acceptable Knowledge (AK)
- Project Office Certification Activities
- Transportation
- Waste Certification and Waste Isolation Pilot Plant (WIPP) Waste Data System (WDS)/Waste Information System (WWIS) Data Entry
- Measurement and Test Equipment (M&TE)
- Work Standards
- Procedures
- Authorization Basis (AB)
- Notification Protocol
- Procurement
- Occurrence Reporting
- Records

This document outlines the responsibilities of the personnel identified in the CCP/CHPRC organization chart shown in Figure 1, CCP/CHPRC Organizational Interface.

To support CHPRC in the packaging and disposal of their TRU wastes, CCP will provide characterization services in accordance with the *Waste Isolation Pilot Plant Hazardous Waste Facility Permit, Waste Analysis Plan (WIPP-WAP)*, and DOE/WIPP-02-3122, *Contact-Handled Transuranic Waste Acceptance Criteria for the Waste Isolation Pilot Plant*

(WIPP-WAC). 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). As the waste generator, CHPRC manages the waste and has responsibility for its disposal. CHPRC may operate CHPRC equipment for purposes other than WIPP characterization/certification.

CCP will certify waste for disposal in accordance with the certification authority that has been granted by the DOE/CBFO.

In providing these services, CCP may opt to use other DOE/CBFO certified TRU programs. Examples include the Idaho National Laboratory Environmental Chemistry Laboratory for headspace gas (HSG) analysis, the Idaho Cleanup Project (ICP) Analytical Chemistry Laboratory for solids and soils analysis, and Hanford for NDA, VE, and HSG sampling and analysis. CCP will accept batch data reports (BDRs) validated through the data generation level from these other DOE/CBFO certified programs while performing project office activities in accordance with the DOE/CBFO Quality Assurance Program Document.

Using data provided by Hanford, CCP will provide intersite certification and transportation for containers to be transported to AMWTP.

2.0 REQUIREMENTS

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

- Memorandum of Agreement, MOA-CHPRC-CCP-2011, Rev. 0 between CH2M Hill Plateau Remediation Company and Washington TRU Solutions Central Characterization Project, *Performance of Transuranic Waste Characterization and Certification Activities at Hanford*
- *Waste Isolation Pilot Plant Hazardous Waste Facility Permit, Waste Analysis Plan*, New Mexico Environment Department, Santa Fe, New Mexico
- DOE/CBFO-94-1012, *U.S. Department of Energy Carlsbad Field Office Quality Assurance Program Document*
- DOE/WIPP-02-3122, *Transuranic Waste Acceptance Criteria for the Waste Isolation Pilot Plant*
- 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*
- DOE/RL-92-36, *Hanford Site Hoisting and Rigging Manual*, current revision
- CHPRC-00072, *CH2M Hill Plateau Remediation Company Radiation Protection Program*
- CHPRC-00073, *CH2M Hill Plateau Remediation Company Radiological Control Manual*

- PRC-MP-MS-003, *CHPRC Integrated Safety Management System/Environmental Management System Description (ISMSD)*
- HNF-11724, *CHPRC Safety Management Programs*
- HNF-7098, *Criticality Safety Program*
- PRC-MP-SH-32219, *10 CFR 851 CHPRC Worker Safety and Health Program Description*
- PRC-PRO-SH-6155, *Chronic Beryllium Disease Prevention Program*
- PRC-PRO-WKM-12115, *PRC Work Management*
- PRC-GD-WKM-12116, *Work Planning Guide*
- PRC-PRO-WKM-079, *Job Hazard Analysis*
- PRC-GD-WKM-17132, *Automated Job Hazards Analysis Process Guide*
- Department of Energy Hanford Site Radioactive Air Emissions License Number FF-01
- Supplemental Contractor Requirements Document SCRD M 231.1-2
- HNF-9830, *Plutonium Finishing Plant Authorization Agreement Between U.S. Department of Energy, Richland Operations Office and CH2M Hill Plateau Remediation Company.*
- HNF-25842, *Solid Waste Operations Complex Authorization Agreement*
- Latest revision of the PFP Safety Basis as documented on <http://www7.rl.gov/rapidweb/PFP-DOCS/index2.cfm?FileName=%2Fdocs%2F12%2Fdocs%Fsafetybasis%2Ehtm>
- Latest revision of the SWOC Safety Basis as documented on <http://www7.rl.gov/WM/index.cfm?PageNum=143>
- DOE-0342, *Hanford Site Chronic Beryllium Disease Prevention Program*
- 10 CFR Part 851, *Worker Safety and Health Program; Final Rule*
- 29 CFR Part 1910, *Occupational Safety and Health Standards*

3.0 RESPONSIBILITIES

3.1 CCP Project Manager (PM)

- 3.1.1 Functions as the CCP primary and onsite interface and point of contact between CCP and CHPRC.
- 3.1.2 Confirms that WIPP waste characterization activities are conducted at the Hanford Site per MOA requirements and schedule.
- 3.1.3 Confirms sufficient characterization equipment is available to perform the required characterization activities at Hanford.
- 3.1.4 Provides the AK Summary Report for Hanford waste streams characterized by the CCP to the Site Technical Representative (STR).
- 3.1.5 Works in conjunction with Hanford operations to confirm reasonable and appropriate through-put of waste containers.
- 3.1.6 Provides evidence to the STR of Performance Demonstration Program (PDP) participation and successful completion for each applicable operating system.
- 3.1.7 Provides historical operating information to the STR as requested for lessons learned and implementing possible mitigating actions.
- 3.1.8 Coordinates with CHPRC to develop and maintain a project schedule to manage the activities described in this Interface Document.

3.2 CCP Site Project Manager

- 3.2.1 Provides project-level verification and validation of Batch Data Reports (BDRs).
- 3.2.2 Provide documents in a timely manner to ensure proper document clearance review based on agreed upon schedule.
- 3.2.3 Coordinates with PM to develop and maintain a project schedule to manage the activities described in this Interface Document.
- 3.2.4 Receives documentation of required Hanford Site and facility-specific training.

- 3.2.5 Confirms that WIPP Waste Characterization activities are conducted at the Hanford site per regulatory approvals.
- 3.2.6 Reviews required software QA per CCP-QP-022, *CCP Software Quality Assurance Plan*.
- 3.2.7 Prepares Waste Stream Profile Form (WSPF) for applicable containers to be certified.
- 3.2.8 Ensures the AKE posts the list of containers acceptable for characterization on the CCP File Transfer Protocol (ftp) site. This list will be updated routinely as necessary and appropriate.

3.3 CCP Quality Assurance (QA) Engineer

- 3.3.1 Reports to the CCP QA Manager to maintain functional authority and independence from cost and schedule considerations.
- 3.3.2 Functions as the onsite CCP QA authority to ensure compliance with the approved CCP QA programs and procedures.
- 3.3.3 Validates the Nonconformance Reports (NCRs) generated by CCP personnel.
- 3.3.4 Provides access to CCP nonconformance documentation to the STR.
- 3.3.5 Provides STR with semi-annual trending summary reports in accordance with CCP-QP-014, *CCP Quality Assurance Trend Analysis and Reporting*.
- 3.3.6 Ensures that surveillances of CCP waste characterization activities at CHPRC are performed on a periodic basis and surveillance reports are provided to the STR, as requested.
- 3.3.7 Provides assistance in generation, disposition, and closure of NCRs and Corrective Action Reports (CARs).
- 3.3.8 Performs Receipt Inspection, as required, of Items and Services procured by CCP in accordance with CCP-QP-026, *CCP Inspection Control*.

- 3.4 CHPRC Site Technical Representative (STR)
- 3.4.1 Functions as the CHPRC point-of-contact, and is the primary interface between CHPRC site organizations and CCP.
 - 3.4.2 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).
 - 3.4.3 Ensures radiological support as requested by CCP and required by the CHPRC Radiation Protection Program is available for waste characterization and container handling.
 - 3.4.4 Ensures documentation of completed Hanford and facility-specific training for CCP personnel is available to the Site Project Manager (SPM), Vender Project Manager (VPM), Transportation Certification Official (TCO), and PM.
 - 3.4.5 Reviews, provides comments on, and approves identified documents.
 - 3.4.6 Provides adequate record storage facilities and access to the records for the CCP AK source documents as needed.
 - 3.4.7 Provides local AK personnel to support characterization operations as needed.
 - 3.4.8 Ensures that facilities, equipment, processes, and procedures used by CCP to perform activities related to this Interface Document comply with the requirements of CHPRC, and with physical safety requirements as specified by the CHPRC operations. The CCP will maintain a conduct of operations program in accordance with DOE requirements. CHPRC will ensure activities comply with the requirements of the CHPRC safety basis documents and the CCP Conduct of Operations through appropriate surveillances and assessments. Findings from such surveillances and assessments will be provided to CCP to be managed per Section 4.3 of this interface document.
 - 3.4.9 Ensures CCP VPM receives dosimetry and bioassay results on radiological worker-trained CCP personnel consistent with Hanford dosimetry program.

- 3.4.10 Ensures the provisions of the CHPRC Radiological Control Manual are implemented and compliance is maintained.
- 3.4.11 Ensures that CCP activities and equipment comply with the Hanford Authorization Envelope (AE), as described in the project Authorization Agreement (AA).
- 3.4.12 Ensures CCP is notified of any occurrence reports resulting from activities under the CCP scope of work.
- 3.4.13 Ensures Hanford Site clearance reviews are completed on documents supplied to CCP and documents generated by CCP.

3.5 CHPRC Managers

- 3.5.1 For VE operations, confirms "In Process" waste containers are accessed only when VE operations are in place to document the waste feed, types, and quantities. Coordinates with CCP PM on packaging waste (e.g., bracing, weight limits, fissile limits, waste types) to maintain compliance. Coordinates with the visual examination operators (VEOs) to document the waste stream going into the waste packaging as it is being generated. Coordinates with PM and VPM to efficiently move waste containers in support of container management, real-time radiography, nondestructive assay, head gas/flammable gas sampling, and transportation activities.

3.6 CCP Vendor Project Manager (VPM)

- 3.6.1 Provides pre-operations briefing to CCP personnel.
- 3.6.2 Notifies the CCP SPM, PM, and STR if the Host site Safety Basis notification levels are met or exceeded.
- 3.6.3 Confirms that in-process documents are transmitted to the CCP Project Office as soon as practicable.
- 3.6.4 Confirms applicable Material Safety Data Sheets (MSDSs) are maintained and available to support operations.
- 3.6.5 Attends Facility Planning meetings where safety issues and activities for the day are discussed, facility status is reviewed, and radiological changes are identified.

- 3.6.6 Provides day to day supervision for other onsite CCP personnel assigned to the characterization project which is the subject of this interface agreement.
 - 3.6.7 Reviews CHPRC-provided dosimetry and bioassay results on radiological worker trained CCP personnel and ensures the applicable results are provided to the individual CCP employee.
 - 3.6.8 Reports the status of operations and personnel issues to CCP SPM and PM.
 - 3.6.9 CHPRC has determined that Operator Aids and Standing Orders cannot be used if they affect changes to equipment operation or configuration. The VPM will obtain STR approval for Standing Orders and Operator Aids issued by CCP.
 - 3.6.10 Notifies the Duty Operations Supervisor (DOS), Building Emergency Director (BED), or Shift Operations Manager (SOM) immediately of unplanned conditions or events, or of injuries to CCP personnel.
- 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 WDS/WWIS Data Spreadsheet.
 - 3.7.3 Certifies the data for the container(s) to be certified as identified on the CCP WDS/WWIS Data Spreadsheet.
 - 3.7.4 Submits the container data from the CCP WDS/WWIS Data Spreadsheet to the WDS/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 Waste Certification Official (WCOs) in WIPP Data System/WIPP Waste Information System (WDS/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 list of qualified individuals (LOQI).
- 3.8.6 Confirms that waste transportation activities are conducted at Hanford 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*. Documented Hanford site Employee Job Task Analysis (EJTAs) are required for (1) CCP workers who are employed at the Hanford site and work there for more than 30 days in a 12-month period; or (2) CCP workers who may be exposed to any of the chemical/physical hazardous exposures or anticipated work assignments identified in Appendix C, *Determining Contract Required Occupational Medical Examinations*, of PRC-PRO-SH-40078, *Contractor Safety Processes*. Physicals to support Employee Job Task Analysis and respirator use at the Hanford Site will be provided by AdvanceMed Hanford (AMH). Workers who may be exposed to any of the chemical/physical hazardous exposures or anticipated work assignments identified in PRC-PRO-SH-40078 hazards are required to have an approved EJTA (and medical monitoring and qualification exams if determined to be required by AMH) prior to being assigned to tasks that could expose them to those hazards. Additionally, CCP personnel assigned to Hanford facilities must complete required Hanford and facility-specific training prior to the individual being assigned to perform work duties on the Hanford site. The LOQI will be maintained and monitored by the CCP VPM and be provided to the Waste Receiving and Processing (facility) (WRAP) DOS, as required, to confirm CCP personnel are in compliance with training and qualification requirements specified for their job assignment.

4.1.2 The STR will identify the applicable Hanford training required, and will assist the PM and SPM with scheduling the CCP personnel for the Hanford and facility-specific training, and will provide successful completion records of training to the SPM in a timely fashion.

4.2 Container Management

4.2.1 CHPRC is responsible for container movement, segregation, and storage.

4.2.2 CCP will perform container management in accordance with CCP-TP-068, *CCP Standardized Container Management*. Container management by CCP is for controlling and tracking TRU waste containers during the characterization process.

- 4.2.3 CHPRC will provide the dose rate and surface contamination information necessary for CCP to certify containers for disposal.
- 4.2.4 CHPRC is responsible for providing documentation to the SPM for any modification to containers after original container closure and/or AK has been completed. The SPM/Designee will review such documentation of modified containers and will correct, change, or modify CCP characterization data, as needed.

4.3 Deficiencies

4.3.1 CCP Identified Deficiencies

NOTE

The CCP QA Engineer will confirm appropriate closure of the deficiencies that are resolved by CCP.

- [A] If CCP personnel identify a non-conforming 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*.
- [B] If the nonconformance is an issue that will be resolved by CCP, the CCP QA Engineer will provide notification (e.g., posting on the ftp web site, verbal, or e-mail as requested) to the STR. The STR may request any supporting documentation as needed.
- [C] If the nonconformance cannot be resolved by the CCP (e.g., certain prohibited items or non-certifiable container type), a copy of the NCR/CAR will be provided to the STR by the CCP QA Engineer. STR will ensure appropriate corrective actions by CHPRC personnel are performed.
- [D] Upon acknowledgment by the STR of rejected containers with disposition of return to CHPRC, CCP will not display the containers on the Acceptable Knowledge Tracking Spreadsheet (AKTSS). NCRs can be closed once HOLD Tag removal has been validated and reconciled, and QA Engineer has verified STR acknowledgement and removal of containers from AKTSS.

- [E] CCP will notify CHPRC of all NCRs and CARs and will make them available to CHPRC for tracking and internal reporting.
- [F] CCP will notify the STR immediately of events requiring reporting in accordance with Supplemental Contractor Document SCRD M 231.1-2 resulting from the CCP scope of work.
- [G] CHPRC and CCP shall periodically (at least semi-annual) validate their respective lists of nonconformances and deficiencies to ensure that open NCR/CAR dispositions remain valid.

4.3.2 If CHPRC personnel identify a non-conforming condition associated with a waste container during the CCP characterization or certification process, CHPRC personnel will notify the PM and initiate an NCR or other appropriate documentation in accordance with Hanford Site procedures.

4.3.3 Deficiencies within CCP processes identified by CCP or through CHPRC Unreviewed Safety Question Determination (USQD) screening, surveillances, or assessments will be resolved in a manner that is mutually agreeable to both CHPRC and CCP.

4.4 Visual Examination (VE)

4.4.1 CHPRC will provide the facilities to perform VE requirements for certification of TRU waste.

4.4.2 CHPRC will provide personnel to manipulate the waste so the objectives of VE can be verified.

4.4.3 CHPRC will package waste in accordance with facility-specific CHPRC procedures. All data generated from these facility-specific CHPRC procedures will not be used for WIPP certification, transportation, or disposal at WIPP.

4.4.4 CCP will perform VE in accordance with CCP-TP-113, *CCP Standard Contact-Handled Waste Visual Examination*.

4.4.5 Containers with prohibited items will be remediated by CHPRC, if possible, or containers will be returned to CHPRC.

4.5 Nondestructive Examination (NDE)

- 4.5.1 CHPRC will deliver the container to the NDE vault. CCP will perform NDE with approved CCP procedures using Hanford or CCP-provided units. Containers rejected by NDE will be dispositioned by the Host site consistent with the requirements of Section 4.3.
- 4.5.2 CHPRC will ensure that waste containers provided to CCP for the radiography process are staged such that the waste will not be frozen (i.e., no chance of liquids in the waste container being frozen).
- 4.5.3 CCP will provide the radiographer's results in electronic format to CHPRC.
- 4.5.4 CCP will provide CHPRC the Real-Time Radiography (RTR) images and data sheets for rejected containers prior to removal from vault.
- 4.5.5 Prior to removing the waste container from the NDE vault, CCP will inform the DOS at WRAP and the VPM/Designee of any waste container that includes pyrophoric/explosive items, flammable items, any pressurized containers, or any discernable liquid, as well as any drums with questionable structural integrity.

4.6 Headspace Gas (HSG) Sampling

- 4.6.1 CCP will collect the sample(s), complete and control any associated chain of custody forms and paperwork.
- 4.6.2 CCP will deliver the samples packaged for shipment to a CBFO certified laboratory to the appropriate CHPRC personnel in the 200-West Area for shipping.
- 4.6.3 CHPRC will provide a temperature-controlled environment (i.e., thermal conditioning unit) 18°C (65°F) or greater to equilibrate waste containers for a minimum of 72 hours prior to HSG sampling. The temperature must be maintained until the container is sampled.
- 4.6.4 CCP will provide the calibrated instrumentation needed to monitor the temperature requirements with documentation provided.
- 4.6.5 CHPRC will set up radiological zones and will assist CCP personnel for contamination control and support as needed.

4.6.6 The DOS will be notified by the SPM if after completion of the analysis, the container exceeds >500 parts per million (ppm) flammable Volatile Organic compounds (VOCs).

4.7 Flammable Gas Analysis (FGA)

4.7.1 CCP personnel will collect the samples, complete and control paperwork, and perform the analysis in accordance with DOE/WIPP-06-3345, *Waste Isolation Pilot Plant Flammable Gas Analysis*.

4.7.2 CHPRC will set up radiological zones and will assist CCP personnel for contamination control and support as needed.

4.7.3 The DOS and the VPM will be notified by CCP FGA personnel if after completion of the analysis, the container exceeds the following:

- >500 ppm flammable VOCs
- >5% Hydrogen
- >1,250 ppm Methane

4.8 Nondestructive Assay (NDA)

4.8.1 CHPRC personnel will deliver containers to and from the counters, enter required information in the data bases and start the instruments.

4.8.2 CCP NDA will witness the Hanford operations as necessary to confirm compliance with the certification program and document this information using approved CCP procedures.

4.8.3 CHPRC will provide support for the CCP participation in the NDA PDP. This support includes preparation of the test containers, delivery of the containers to the NDA equipment, and responsibility for PDP source control. The CHPRC support will be coordinated by the STR.

4.8.4 CHPRC personnel will review data and perform analysis for site use.

- 4.9 Acceptable Knowledge (AK)
 - 4.9.1 CCP AK personnel will perform and document the AK collection, reporting, and verification in accordance with CCP-TP-005, *CCP Acceptable Knowledge Documentation*.
 - 4.9.2 CHPRC AK personnel will assist CCP AK personnel, as needed.
 - 4.9.3 CHPRC will provide the necessary public release clearances for CCP-generated documents.
 - 4.9.4 CCP will maintain copies of the AK source documents necessary to support the AK Summary Report in accordance with the WIPP-WAP and the QAPD.
- 4.10 CCP Project Office Certification Activities
 - 4.10.1 CCP Project Office certification activities consist of project-level review of BDRs, lot evaluations, and data validation.
 - 4.10.2 CCP Project Office certification activities will be conducted using personnel trained under the CCP Certified Program.
 - 4.10.3 Data validators are responsible for completing the required checklists, resolving comments, and ensuring records are complete.
- 4.11 Waste Certification and WDS/WWIS Data Entry
 - 4.11.1 The CCP WCO will transmit characterization and certification data using the WDS/WWIS and procedure CCP-TP-030, *CCP CH TRU Waste Certification and WWIS/WDS Data Entry*.
 - 4.11.2 For intersite shipments the CCP WCO will transmit certification data using the intersite module of the WDS/WWIS and procedure CCP-TP-404, *CCP Contact-Handled Transuranic Waste Certification and Data Entry for Intersite Shipments*.
 - 4.11.3 CCP will prepare WSPFs for the subject CHPRC managed waste in accordance with CCP-TP-002, *CCP Reconciliation of DQOs and Reporting Characterization Data*.
 - 4.11.4 The CCP SPM will submit the Waste Stream Profile Package for CHPRC concurrence before CCP final approval and submittal to

CBFO. The STR will provide written concurrence on the Waste Stream Profile Package.

4.11.5 The CCP 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.

4.11.6 For intersite shipments the CCP WCO will document and certify that all TRU waste payload containers meet the requirements of the CH-TRAMPAC.

4.12 Transportation

4.12.1 Transportation certification, preparation of the shipment of certified packages (i.e., Transuranic Package Transporter-II [TRUPACT-II], HalfPact), and shipment of the waste will be conducted using personnel trained under the CCP Certified Program. CCP will perform the unlocking, disassembly, cleaning of parts, reassembly, locking, and leak tests of the TRUPACT-II packages.

4.12.2 Payload assembly will be performed by CHPRC with CCP- TCO oversight.

4.12.3 CHPRC will perform all crane operations/spotter activities including removal and placement of lids, operation of the Adjustable center-of-gravity lift fixture (ACGLF), and placement of payloads into the TRUPACT-II at the direction of the CCP-TCO.

4.12.4 Hoisting and rigging operations will be performed in accordance with DOE/RL-92-36, *Hanford Site Hoisting and Rigging Manual*, current revision.

4.12.5 CHPRC will provide manifesting, marking, labeling and placarding of the shipments in accordance with Title 40 Code of Federal Regulations (CFR), Title 49 CFR requirements, and site-specific procedures.

4.12.6 The CCP-TCO will inspect the containers and verify that the filter installed on the containers to be shipped meet WIPP requirements and match information submitted during waste characterization.

4.12.7 Waste will be loaded and prepared for transport to WIPP or AMWTP in accordance with DOE-approved operating procedures.

- 4.12.8 The CCP-TCO will provide documentation to CHPRC certifying the waste for shipment in accordance with CCP procedures.
- 4.12.9 CHPRC is not responsible for scheduling and coordination with State Police for departure inspections.
- 4.13 Measurement and Test Equipment (M&TE)
- 4.13.1 CCP VPM will provide a list of equipment that requires calibration to the STR. 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.
- 4.13.2 CHPRC will provide National Institute of Science and Technology (NIST) traceable calibration services for the CCP and/or vendor-provided M&TE. CHPRC will maintain records on M&TE calibration in accordance with the CHPRC program. Copies of the Certificates of Calibration and Notices of Discrepancy will be provided to the CCP VPM and approved by the CCP program prior to the equipment being used. CCP shall provide appropriate WIPP flowdown language for CHPRC's inclusion in calibration subcontract(s).
- 4.13.3 The STR will make calibration and Notice of Discrepancy documentation available, as needed, for internal and external audits.
- 4.14 Work Standards
- 4.14.1 CCP personnel will work under applicable CHPRC procedures and programs for all work other than waste characterization and certification (e.g., Radiological Protection Program, Worker Health and Safety Program, Work Management, Hoisting and Rigging).
- 4.14.2 CCP personnel will work under CCP-approved procedures for waste characterization and certification activities, and CHPRC procedures and/or work control documents for all other work activities (e.g., equipment repairs).
- 4.14.3 CHPRC will perform maintenance on Hanford Site equipment. CHPRC maintenance personnel may assist CCP with maintenance of CCP equipment using the PRC Work Management process (PRC-PRO-WKM-12115, *PRC Work Management*, and associated procedures). Should CCP elect to perform maintenance on CCP equipment located in CHPRC facilities, CCP will also use the PRC

Work Management process (PRC-PRO-WKM-12115, PRC *Work Management*, and associated procedures). All activities on CCP equipment will meet CCP configuration and maintenance requirements and will be authorized by the CCP VPM.

4.14.4 CCP personnel performing work under CCP Procedures will operate in accordance with CCP-PO-005, *CCP Conduct of Operations*, for waste characterization and certification activities. All other work within the Hanford host facility will be performed under the CHPRC Conduct of Operations program.

4.14.5 CCP personnel will follow the CHPRC radiological protection requirements and participate in the CHPRC programs. CCP will work under CHPRC's 10 CFR Part 851, *Worker Safety and Health Program; Final Rule*, and DOE-0342, *Hanford Site Chronic Beryllium Disease Prevention Program*, programs and procedures to ensure compliance within the safety and environmental envelope of the site.

4.14.6 CCP shall provide day to day supervision of CCP personnel and thereby be treated as a separate responsible entity for reporting of any injuries occurring to WTS personnel requiring reporting under 29 CFR Part 1910.4, *Occupational Safety and Health Standards*, as invoked by 10 CFR 851.

4.14.7 CHPRC will provide radiological PPE and personnel monitoring devices (e.g., lapel samplers, special dosimetry) in accordance with CHPRC ESH&Q requirements.

4.15 Procedures

4.15.1 Editorial or minor changes may be made to all CCP documents except CCP-PO-001, CCP-PO-002, CCP-PO-003, and CCP-QP-001 without the same level of review and approval as the original document. All changes to procedures used in CHPRC facilities, including editorial or minor changes, will undergo the CHPRC unreviewed safety question (USQ) process (listed in 4.15.5). CHPRC has committed to a three day turnaround for the USQ process for any CCP procedure that can be addressed by a Categorical Exclusion per PRC-PRO-NS-062, *Unreviewed Safety Question Process*. The USQ process must be completed prior to implementation of the procedure at the CHPRC facility.

4.15.2 CHPRC will submit a listing of CCP procedures to DOE-RL for their consideration for inclusion in PRC-PRO-NS-062, *Unreviewed Safety Question Process*, Appendix B, as procedures that are outside the scope

of the USQ process. Upon inclusion in Appendix B, all future revisions to those procedures will be exempt from the CHPRC USQ process.

- 4.15.3 Any new operating procedures developed by CCP for use at Hanford will be evaluated by the STR to determine if the procedure shall be added to the CHPRC review lists noted below. Any new procedures developed by CCP for use at Hanford will undergo the USQ process by CHPRC.

NOTE

If operations no longer warrant use of any document listed in 4.15.4, the SPM may determine that the STR review is not applicable or a "Notify Only" is appropriate. If the document is reinstated, STR review will be required prior to site use. Documents listed in 4.15.5 which are to be cancelled are required to undergo the USQ process prior to cancellation.

- 4.15.4 The following documents, and all revisions to these documents, will be provided to the CHPRC STR for review and concurrence:

- All applicable AK Summary Reports
- CCP-PO-011, *CCP/CH2M HILL Plateau Remediation Company Interface Document*
- CCP-TP-093, *CCP Sampling of TRU Waste Containers*
- CCP-TP-071, *CCP Gamma Energy Assay (GEA) Operating Procedure*
- CCP-TP-147, *CCP Operation of the Drum Nondestructive Examination Systems at Waste Receiving and Processing (WRAP) Facility*
- CCP-TP-137, *CCP Operation of the Hanford SuperHENC Assay System*
- CCP-TP-140, *CCP Equipment Maintenance*
- CCP-TP-198, *CCP HE-RTR Operating Procedure*
- CCP Waste stream Profile Forms
- CCP Health and Safety Plans

4.15.5 The following documents, and revisions to these documents, are subject to the CHPRC USQ process requirements described in Section 4.15.1 and will be provided to the CHPRC STR/Designee for USQ Screening per PRC-PRO-NS-062, *Unreviewed Safety Question Process*. The STR shall provide documentation that USQ process is complete and the document can be used at Hanford. For any changes to CCP-PO-005, CCP will allow five working days prior to implementation for CHPRC to complete an evaluation of these changes and update any compliance matrices, as needed.

- CCP-CM-001, *CCP Equipment Change Authorization and Documentation*
- CCP-HSP-014, *Health and Safety Program Implementation for CCP*
- CCP-PO-001, *CCP TRU Waste Characterization Quality Assurance Project Plan*
- CCP-PO-002, *CCP Transuranic Waste Certification Plan*
- CCP-PO-003, *CCP TRU Authorized Methods for Payload Control (CCP CH-TRAMPAC)*
- CCP-PO-005, *CCP Conduct of Operations*
- CCP-PO-026, *CCP Configuration Management*
- CCP-QP-001, *CCP Graded Approach*
- CCP-QP-002, *CCP Training and Qualification Plan*
- CCP-QP-004, *CCP Corrective Action Management*
- CCP-QP-005, *CCP TRU Nonconforming Item Reporting and Control*
- 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-QP-014, *CCP Quality Assurance Trend Analysis and Reporting*

- CCP-QP-015, *CCP Procurement*
- CCP-QP-016, *CCP Control of Measuring and Testing Equipment*
- CCP-QP-017, *CCP Identification and Control of Items*
- CCP-QP-018, *CCP Management Assessment*
- CCP-QP-019, *CCP Quality Assurance Reporting to Management*
- CCP-QP-021, *CCP Surveillance Program*
- CCP-QP-022, *CCP Software Quality Assurance Plan*
- CCP-QP-023, *CCP Handling, Storage and Shipping*
- CCP-QP-025, *CCP Lessons Learned Program Management Control Procedure*
- CCP-QP-026, *CCP Inspection Control*
- CCP-QP-027, *CCP Test Control*
- CCP-QP-028, *CCP Records Filing, Inventorying, Scheduling and Dispositioning*
- CCP-QP-030, *CCP Written Practice for Qualification of CCP Helium Leak Detection Personnel*
- CCP-QP-032, *CCP Written Practice for the Qualification of CCP Pressure Change Leak Testing Personnel*
- CCP-TP-001, *CCP Project Level Data Validation and Verification*
- CCP-TP-002, *CCP Reconciliation of DQOs and Reporting Characterization Data*
- CCP-TP-003, *CCP Data Analysis for S3000, S4000, and S5000 Characterization*
- CCP-TP-005, *CCP Acceptable Knowledge Documentation*
- CCP-TP-020, *CCP Transportation Vehicle Inspection*

- CCP-TP-028, *CCP Radiographic Test Drum and Training Container Construction*
- CCP-TP-030, *CCP CH TRU Waste Certification and WWIS/WDS Data Entry*
- CCP-TP-033, *CCP Shipping of CH TRU Waste*
- CCP-TP-053, *CCP Standard Real-Time Radiography (RTR) Inspection Procedure*
- CCP-TP-055, *CCP Varian Porta-Test Leak Detector Operations*
- CCP-TP-058, *CCP NDA Performance Demonstration Program*
- CCP-TP-068, *CCP Standardized Container Management*
- CCP-TP-070, *CCP Gamma Energy Assay (GEA) Calibration, Confirmation and Verification Procedure*
- CCP-TP-071, *CCP Gamma Energy Assay (GEA) Operating Procedure*
- CCP-TP-072, *CCP Gamma Energy Assay (GEA) Data Review, Validation, and Reporting Procedure*
- CCP-TP-086, *CCP CH Packaging Payload Assembly*
- 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-137, *CCP Operation of the Hanford SuperHENC Assay System*
- CCP-TP-140, *CCP Equipment Maintenance*
- CCP-TP-144, *CCP Hanford SuperHENC Calibration Procedure*

- CCP-TP-147, *CCP Operation of the Drum Nondestructive Examination Systems at Waste Receiving and Processing (WRAP) Facility*
- CCP-TP-162, *CCP Random Selection of Containers for Solids and Headspace Gas Sampling and Analysis*
- CCP-TP-198, *CCP HE-RTR Operating Procedure*

NOTE

The following procedures apply to intersite shipments only.

- CCP-TP-404, *CCP Contact-Handled Transuranic Waste Certification and Data Entry for Intersite Shipments.*
- CCP-TP-405, *CCP Intersite Shipments of Contact-Handled Transuranic Waste.*

4.15.6 The STR will review or designate the appropriate reviews of the CCP procedures listed in 4.15.4, and forward written comments to CCP Document Control in accordance with CCP-QP-010, *CCP Document Preparation, Approval, and Control*, for resolution.

4.15.7 The STR will obtain the USQ documentation for those documents listed in 4.15.5 and forward the approval for use in accordance with CCP-QP-010, *CCP Document Preparation, Approval and Control*, for resolution.

4.15.8 The SPM will confirm that the STR's written comments are resolved with STR concurrence prior to proceeding with CCP operations.

4.16 Documents

4.16.1 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, or formal correspondence. Documents identified as quality records will be transmitted via CCP-QP-008, *CCP Records Management*, and/or CHPRC-approved records management procedure, as appropriate.

4.16.2 Any changes made to this Interface Document (CCP-PO-011) will be reviewed and approved by the PM, SPM, and STR.

4.16.3 Documents to be provided to CHPRC by CCP include:

- [A] List of M&TE requiring CHPRC calibration documentation.

- [B] Copies of calibration records for the radiation monitor used in the High Energy RTR unit.
- [C] NCR data and copies of CARs.
- [D] Cross-reference of containers to BDRs, as requested by CHPRC.
- [E] Copies of AK Summary Reports.
- [F] Copies of AK source documents and source document summaries, as requested.
- [G] Copies of semi-annual trending summary reports.
- [H] Copies of QA surveillance reports.
- [I] Copies of WSPFs.
- [J] Copies of VE, NDE Radiological Characterization, NDA, HSG, and FGA information and data, as requested.
- [K] Copies of Souce/Receipt Inspection Verification Sheet (S/RIVS) and associated objective evidence for each shipment.
- [L] Information on chemical usage, sources required, and copies of applicable MSDSs as requested for inventory or reporting reasons.
- [M] Copies of CCP training requirements and associated training records for CCP personnel as requested.
- [N] CCP-PO-001, *CCP Transuranic Waste Characterization Quality Assurance Project Plan*.
- [O] CCP-PO-002, *CCP Transuranic Waste Certification Plan*.
- [P] Results of all DOE/CBFO/New Mexico Environment Department (NMED)/Department of Environmental Quality (DEQ)/United States Environmental Protection Agency (EPA) or other regulatory audit or compliance/enforcement actions that may impact ability to characterize and transport TRU waste.
- [Q] Copy of final data package to WIPP via Waste Information System, as requested.

- [R] Documented evidence of participating in and passing the CBFO Performance Demonstration Program (PDP), if necessary.
- [S] NMED and EPA approval of the CBFO Certification Audit Report.

4.16.4 Documents to be provided to CCP by CHPRC include:

- [A] Copies of calibration certifications (certificate of calibration or equivalent).
- [B] Documentation of required training.
- [C] Documentation of training completion for CCP personnel for training received from CHPRC.
- [D] Copies of AK source documentation requested by CCP.
- [E] Radiological dose rate and surface contamination results (including radiation survey records) on waste containers as needed to support WDS/WWIS data entry.
- [F] CCP personnel dosimetry and bioassay results on the appropriate frequency as determined by the Hanford Site radiological program.
- [G] Copies of NCR's, deficiency reports, or other nonconformance documentation per Section 4.3.
- [H] Copies of the results of CHPRC assessments pertaining to CCP.
- [I] Copies of QA surveillance reports.
- [J] Radiological workplace and exposure data including As low as reasonably achievable (ALARA) Planning documents for evaluation of activities.

4.17 Radioactive Sealed Sources

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

- 4.17.2 CHPRC will provide support for leak testing, labeling, and inventory control for sealed sources owned and used by CCP NDA processes.
- 4.17.3 CHPRC may provide radioactive sealed sources to the CCP NDA processes when required for use in meeting NDA QAOs.
- 4.17.4 CCP PM will submit a written request to the CHPRC STR to bring any radioactive source to Hanford. The request will be accompanied by a copy of the applicable Radioactive Materials License. The CHPRC STR will provide written permission to the CCP PM to bring sealed radioactive sources to Hanford upon receipt and approval of CCP's written request.
- 4.17.5 CCP will provide day-to-day control of the sources it owns and uses in accordance with requirements in the site Radiological Control Program.

4.18 Authorization Basis (AB) and Configuration Management

- 4.18.1 CHPRC has primary responsibility to ensure that CCP equipment and processes have been appropriately considered within the DOE-approved CHPRC safety basis (SB) and other AA documents. Equipment and processes will undergo CHPRC review prior to installation/implementation.
- 4.18.2 CHPRC shall provide to CCP CHPRC generated AA documentation concerning CCP related activities and equipment, including USQs for CCP's information.
- 4.18.3 CCP has primary responsibility to control CCP operations and CCP equipment configurations to ensure compliance with CCP and Host site procedures, safety basis, criticality control documentation, and environmental permits that protect the personnel, public, and environment.
- 4.18.4 For CCP provided equipment, CCP will provide the documentation necessary for CHPRC 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 CHPRC.
- 4.18.5 For CHPRC provided equipment, CCP will review operational documentation to ensure the safety of CCP personnel while equipment is operating.

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

4.18.7 CHPRC will submit all changes to SB requirements that affect CCP operations for review and concurrence by CCP prior to submittal to DOE-RL, with CCP concurrence provided on a mutually agreeable schedule.

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

4.18.9 CHPRC is responsible for software changes made on CHPRC equipment. All software changes on CHPRC equipment will be documented through the CHPRC Software Quality Assurance program and coordinated with CCP.

4.18.10 All software generating data used to certify waste for disposal at WIPP₇ will be controlled using CCP-QP-022, *CCP Software Quality Assurance Plan*. Changes to the core software (NDA2000) will be concurred upon by CHPRC and CCP prior to implementation.

4.19 Notification

4.19.1 CHPRC has primary responsibility to provide prior notification to CCP when there are changes in the CHPRC facilities used by CCP for characterization activities, or changes that may impact operations.

4.19.2 CHPRC has primary responsibility to provide prior notification to CCP when there are changes to policies, processes, or procedures that may affect CCP characterization activities or operations.

4.19.3 CCP has primary responsibility to notify CHPRC when there are configuration changes to CCP or CCP vendor-owned equipment. Changes to equipment used at a CHPRC facility must be subjected to the USQ process.

4.20 Procurement

4.20.1 CHPRC is qualified as a supplier of procurement services on the WTS Qualified Suppliers List (QSL). CHPRC may procure, inspect, and perform receipt inspection of whatever items are listed in the most current WTS QSL for the CCP scope of work. CHPRC will

perform these activities in accordance with its QSL-accepted program. CCP shall specify any WIPP-specific flowdown requirements or characteristics when requesting items or services be provided by CHPRC.

4.21 Occurrence Reporting and Processing System (ORPS) and Price-Anderson Amendment Act (PAAA)

4.21.1 CHPRC will enter reports for all Price Anderson Amendments Act (PAAA) and Occurrence Reporting and Processing System (ORPS) reportable events.

4.21.2 CCP shall provide CHPRC with all information and notifications required by Richland Office Supplemental Contractor Requirements Document M 231.1-2. CCP is responsible for providing information to CHPRC to meet notification and submittal deadlines as required by SCR D M 231.1-2.

4.21.3 If CCP is responsible for the deficient condition, CCP will perform the required level of analysis and provide updated information to CHPRC for revision of the report to the Noncompliance Tracking System and ORPS.

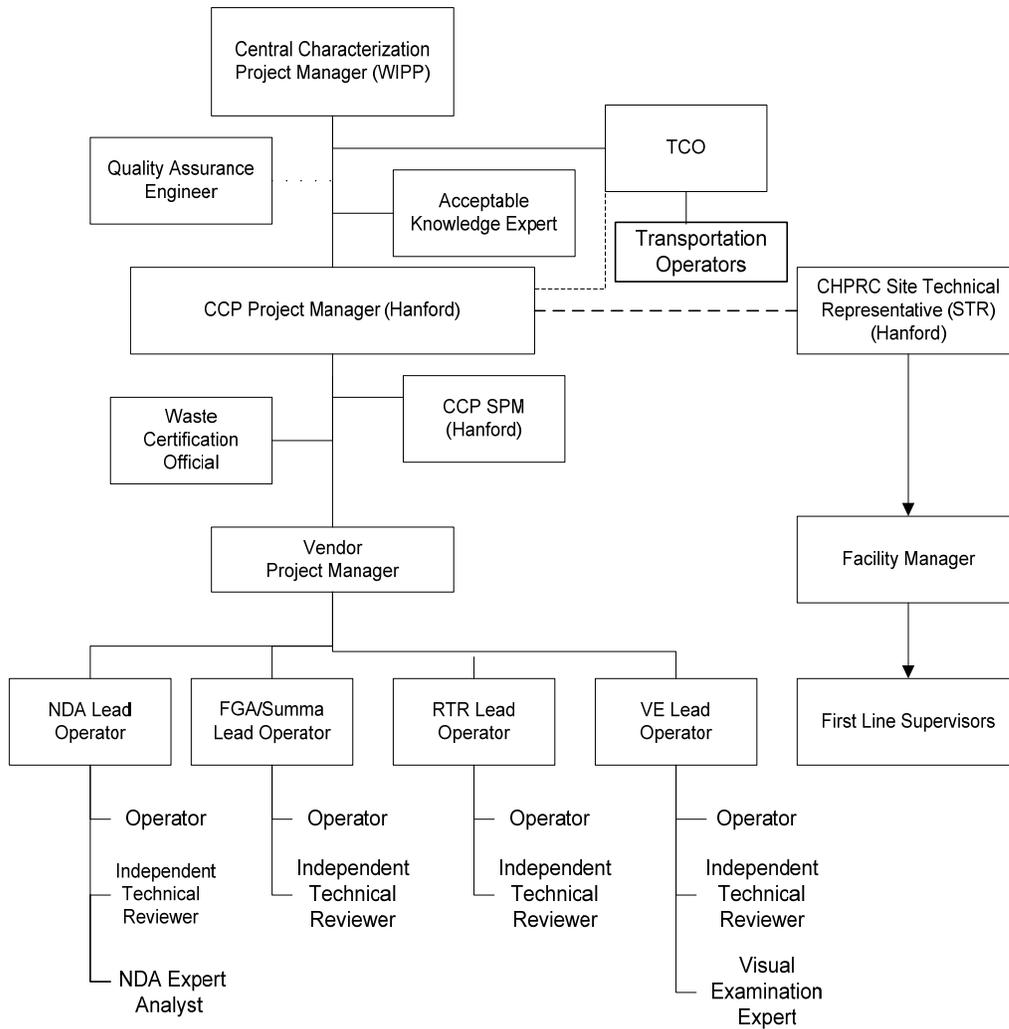
4.22 Project Schedule

In coordination with CCP, CHPRC will develop and maintain a project schedule to manage the activities described in this Interface Document. The CCP will identify and schedule activities to support implementation and certification of its program with WIPP and the subsequent completion of characterization and certification of TRU waste from Hanford to WIPP. The CCP will provide the necessary resources to support planning and scheduling, activity status reporting, project schedule delivery and oversight of the deliverables described in the Interface Document.

5.0 RECORDS

- 5.1 CCP records generated during the performance of this work are maintained as QA records in accordance with CCP-QP-008.

Figure 1. CCP/CHPRC Organizational Interface



This figure identifies the responsible parties of CH2M Hill Plateau Remediation Company (CHPRC) and Central Characterization Project (CCP) associated with the scope of work for the characterization of the TRU-Waste from CHPRC Facilities.