

CCP-PO-012

Revision 8

CCP/Los Alamos National Laboratory (LANL) Interface Document

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RECORD OF REVISION

Revision Number	Date Approved	Description of Revision
0	10/21/2003	Initial Issue.
1	12/16/2003	Revised the Scope of the document. Updated Section 2.1 References. Updated Section 3.0, steps 3.7 VPM responsibilities and inserted step 3.10 LANL SPQAO responsibilities. Corrected referenced section in step 4.14.4. Updated Figure 1.
2	04/20/2004	Interface Document updated to reflect changes in work scope and joint organizational responsibilities.
3	04/26/2004	Incorporated CBFO Adequacy Review Comment resolutions to Section 1.0 and inserted step 4.17.
4	03/31/2006	Revised to make organizational changes, changes to be consistent with Statement of Work (SOW) clarifications, and changes to reflect coordination details learned during Fiscal Year (FY) 2004. Revised based on the Implementation Plan for CCP Characterization Operations Improvements.
5	11/16/2006	Revised to incorporate controls in the Central Characterization Project (CCP) Basis for Interim Operation (BIO) for the Waste Isolation Pilot Plant (WIPP) Mobile Characterization Units and to provide notifications between the Host site, CCP, and WIPP site. 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).
6	08/06/2007	Revised to clarify Authorization Basis and Configuration Management requirements and editorial changes.
7	05/08/2008	Revised to reflect corrective actions identified during accident investigation and follow-up safety assessments.
8	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

Through the Performance Management Plan (PMP) of July 2002, the U.S. Department of Energy (DOE) Carlsbad Field Office (CBFO) designated the Central Characterization Project (CCP) to provide assistance to the waste processing portion of the Transuranic (TRU) Program at the Los Alamos National Laboratory (LANL) site. A Statement of Work (SOW) ("Statement of Work for Characterization of LANL TRU Waste Contact Handled and Remote Handled") describes the assistance to be provided to CCP by LANL. This document establishes the CCP/LANL interfaces necessary to implement the requirements of the TRU Waste Program. This Interface Document, subordinate to the SOW, defines the interfaces between CCP and Los Alamos National Security (LANS) and details how the services described in the SOW are to be executed. All activities discussed in this document apply to the TRU Waste Project whether identified, conducted or implemented by CCP or LANS personnel.

1.1 Scope

As the waste generator, LANS maintains ownership of the waste and responsibility for its disposal. LANS is responsible to provide the infrastructure to support all activities described in this Interface Document. As set forth in the SOW, CCP will assist LANS by (a) providing a Waste Isolation Pilot Plant (WIPP)-certified program for the characterization, certification, and shipment of LANL TRU wastes, (b) training and qualifying personnel so that they can perform activities under the CCP WIPP-certified program in compliance with DOE Orders relevant to nuclear facilities, (c) providing services, personnel, and equipment to augment LANS required activities, and (d) providing support to establish the Remote Handled (RH) Program (16 canisters).

These services will be performed with CCP and/or Host site equipment operated with appropriate DOE/Carlsbad Field Office (CBFO) certified procedures. The Host site may augment CCP characterization efforts as required by CCP.

The Host site has primary responsibility for assuring that requirements for safety (including Radiological Control, Emergency Management, Industrial Hygiene and Safety), security, safety basis, environmental protection, compliance, and other areas are met for CCP activities.

CCP will work under LANS' approved ES&H Plan. LANS is responsible for supervising and overseeing the implementation of LANS' ES&H Plan, including compliance with Federal, State, and Local regulations protecting workers, the environment, waste management/disposal, and chemical usage. LANS has responsibility for taking such action as is deemed

necessary to ensure compliance with Resource, Conservation and Recovery Act (RCRA), and Toxic Substances Control Act (TSCA), DOE Orders and LANS' requirement related to environmental compliance and waste management.

CCP has responsibility for the safety of CCP employees, CCP subcontractors, and its lower-tier subcontractors as defined in this document, the Statement of Work, and the Memorandum of Agreement. LANS is responsible for reporting conditions or concerns that may have safety, health, quality assurance (QA), security, operational or environmental implications; and therefore, LANS will provide oversight to this scope as set forth in Section 4.2.5. Waste Disposition Project (WDP) activities, whether performed by CCP personnel or CCP activities performed by LANS personnel at LANL will be under the control of the LANL/CCP Project Manager/Designee and WDP Project Manager except for the CCP QA Manager (See Figure 1, CCP Organization), and CCP activities at LANL will be directly under the control of the LANS/CCP Project Manager/Designee. In turn, the LANL/CCP Project Manager/Designee will report through the WDP Waste Disposition Project Directorate.

This document applies to all personnel identified on the detailed LANS/CCP organization charts shown in Figure 1 and Figure 2, Waste Disposition Project with responsibilities for supporting the activities identified in the SOW.

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

- Initial Setup for Operations
- Routine Operations
- Training
- Container Management
- Deficiencies
- Visual Examination (VE) and Prohibited Item Disposition (PID)
- Filter Inspection/Filter Changeout
- NDE
- NDA (certified and non-TRU waste data)
- Source Control
- Headspace Gas (HSG) Sampling
- Flammable Gas Analysis (FGA)
- Acceptable Knowledge (AK)
- Off-Site Source Recovery Program (OSRP)

- Project Office Certification Activities
- Transportation
- Measurement and Test Equipment (M&TE)
- Procedures
- Documents/Records
- Procurement
- Oversight
- QA
- Price-Anderson Amendments Act (PAAA)
- 10 CFR 851
- Drum Venting

2.0 REQUIREMENTS

2.1 Acronyms and Key Definitions

Attachment 1, Acronyms and Key Definitions, lists acronyms and key definitions used in this Interface Document.

2.2 Criteria

The CCP Certified Program will be used to characterize, certify, and ship LANL's TRU waste to WIPP. The specific requirements documents to ensure compliance with the certified program are listed in Attachment 2, Reference Documents.

There are Host site documents used that are not part of the CCP Certified Program. These documents are listed in Attachment 3, LANS Host Site Required Documents.

3.0 RESPONSIBILITIES

3.1 LANL/CCP Project Manager/Designee

- 3.1.1 Confirms that waste characterization activities are conducted at LANL per the SOW requirements and the Interface Document.
- 3.1.2 Provides primary oversight for project safety, and compliance of CCP personnel at LANL to CCP's certified program requirements.
- 3.1.3 Requests personnel and equipment from the LANL/CCP Project Manager to support characterization, certification, and transportation, as required.
- 3.1.4 Provides support to the CCP Site Project Manager (SPM).
- 3.1.5 Receives documentation of required and completed LANL site-specific training.
- 3.1.6 Provides weekly production reports to the DOE/CBFO and LANS Production Control Manager.
- 3.1.7 Receives reports of LANS oversight activities from WDP Environmental Waste Management Operations (EWMO) Facility Operations Director (FOD) and formally responds, as required.
- 3.1.8 Interfaces with DOE/CBFO through the CCP Project Office.
- 3.1.9 Requests special nuclear material sources from LANS NDA Team Leader.
- 3.1.10 Ensures CCP personnel comply with LANS integrated work management, environmental, safety, and security requirements.

3.2 LANS WDP Waste Disposition Project (WDP) Director

- 3.2.1 Ensures WDP completes performance measures/metrics as established by DOE/ Los Alamos Office (LASO).
- 3.2.2 Functions as the point of contact with LANL/CCP Program Manager for coordination and review of CCP procedures, plans, waste stream profile forms, and configuration management documents.
- 3.2.3 Interfaces with DOE/CBFO through the DOE/ LASO.

- 3.2.4 Coordinates all LANS activities in support of TRU Programs working with LANS/CCP Project Manager/Designee.
- 3.2.5 Requests resources to implement the integrated schedule for TRU waste.
- 3.3 Environmental Waste Management Operations (EWMO) Facilities Operations Director/Designee
 - 3.3.1 Provides documentation of surveillances and audits to the LANS/CCP Project Manager/Designee.
 - 3.3.2 Ensures that new and/or modifications to documents for equipment for work performed in support of TRU waste at nuclear facilities are submitted through EWMO Facility Oversight Safety Committee (FOSC) as soon as practicable and receives approval prior to implementation.
 - 3.3.3 Ensures configuration management of LANS-owned equipment is maintained.
 - [A] Ensures that adequate information is provided to CCP on LANS-owned equipment prior to acceptance and turnover of equipment to CCP.
 - 3.3.4 Ensures facility and/or equipment modification requests to LANS-owned equipment and facilities are submitted to EWMO-TRU Waste Operations for approval and are fully defined.
 - 3.3.5 Ensures change control notice is submitted for changes to previously agreed upon modification requests.
 - 3.3.6 Ensures CCP/LANS personnel comply with LANS integrated work management, environmental, safety, and security requirements through document reviews, emergency drills, monitoring, surveillances and audits. CCP will cooperate with and accommodate these oversight activities.

- 3.4 CCP Site Project Manager (SPM)
 - 3.4.1 Functions as CCP's primary interface and point-of-contact between CCP and LANS for certification activities (e.g., data management).
 - 3.4.2 Ensures the AK Summary Reports and drum lists for LANL waste streams are prepared, approved, and issued.
 - 3.4.3 Ensures the preparation and approval of waste stream profile forms (WSPFs), as required.
 - 3.4.4 Generates drum/container random selection lists and provides the lists to the WDP Production Coordination Manager.
 - 3.4.5 Provides evidence to the LANS/CCP Project Manager/Designee and WDP Director of the Performance Demonstration Program (PDP) participation and successful completion for each operating system.
 - 3.4.6 Responsible for project level verification and validation of batch data reports (BDRs).
 - 3.4.7 Provides support to the LANS/CCP Project Manager/Designee.
 - 3.4.8 Ensures that software used by CCP at LANL is controlled in accordance with CCP-QP-022, *CCP Software Quality Assurance Plan*. LANL retains ownership and licenses of LANL developed/procured software.
 - 3.4.9 Confirms that in-process documents are transmitted to the CCP Project Office as soon as practicable.
- 3.5 CCP Quality Assurance (QA) Manager
 - 3.5.1 Reports to the Washington TRU Solutions (WTS) QA Manager to maintain functional authority and independence from cost and schedule considerations.
 - 3.5.2 Functions as CCP's primary interface and point-of-contact for QA issues between the CCP and LANS.
 - 3.5.3 Validates Nonconformance Reports (NCRs).
 - 3.5.4 Provides semi-annual trending summary reports to the CCP SPM.

- 3.5.5 Ensures surveillances of waste characterization activities at LANL are performed on a periodic basis and surveillance reports are provided to the CCP SPM, the LANS/CCP Project Manager/Designee, and the WDP Project Director.
 - 3.5.6 Performs receipt inspection of procured items in accordance with CCP and Host site requirements.
 - 3.5.7 Provides assistance in generation, disposition, and closure of NCRs and Corrective Action Reports (CARs).
 - 3.5.8 Coordinates with the LANS/CCP Project Manager/Designee for any potential Noncompliance Tracking System-Reportable PAAA issues or any occurrence reports resulting from activities under the CCP Certified Program.
- 3.6 CCP Vendor Project Manager (VPM)/Designee
- 3.6.1 Responsible for safety and health of CCP personnel at LANL.
 - 3.6.2 Monitors the List of Qualified Individuals (LOQI) daily to confirm that only qualified personnel perform waste characterization and transportation activities.
 - 3.6.3 Controls access of CCP personnel including its subcontractors to the field. Requests site access for visitors and provides full time escorts.
 - 3.6.4 Functions as CCP's primary interface and point-of-contact between CCP and LANL for characterization activities (operations).
 - 3.6.5 Supports training and briefing of personnel in regards to procedural changes by scheduling training sessions, as required.
 - 3.6.6 Coordinates the daily operations of CCP operations personnel, and its subcontractors.
 - 3.6.7 Works in conjunction with WDP Production Control Manager to manage the control, movement, and tracking of waste containers through the CCP characterization process.

- 3.6.8 Coordinates with the EWMO TRU Waste Operations, CCP Manager and LANL/CCP Project Manager/Designee for any potential Noncompliance Tracking System-Reportable PAAA issues or any occurrence reports resulting from activities under the CCP Certified Program.
 - 3.6.9 Ensures operability and availability of CCP-provided characterization equipment.
 - 3.6.10 Ensures that CCP-provided equipment is maintained under a CCP approved Configuration Management Program.
 - 3.6.11 Ensures that new addition to and/or modifications made to CCP-provided facilities and/or equipment are submitted to EWMO FOSC as soon as practicable and approvals are received prior to implementation.
- 3.7 WDP Production Control Manager
- 3.7.1 Manages the control, movement, and tracking of containers through the CCP characterization process utilizing the CCP SPM-designated container selection list (AK Tracking Spreadsheet).
 - 3.7.2 Ensures that containers are processed in conjunction with the CCP SPM or CCP VPM.
 - 3.7.3 Ensures Material at Risk (MAR) inventory limits established by the Documented Safety Analysis (DSA) for each facility, are not exceeded.
 - 3.7.4 Ensures that applicable container tracking information is maintained and kept current as required to LANL site requirements.
 - 3.7.5 Generates and submits regular, periodic production reports.

- 3.8 LANL EWMO TRU Waste Operations Manager (TWOM)
 - 3.8.1 Reviews and provides comments on the CCP Health and Safety Plan (HSP) for the purpose of ensuring that facility safety and security requirements are met.
 - 3.8.2 Approves CCP health and safety-specific documents, including Integrated Work Documents (IWDs), as the Responsible Division Leader (RDL).
 - 3.8.3 Performs Unreviewed Safety Question Determination (USQD) on CCP procedures to ensure adequate review for the nuclear facility Authorization Basis (AB).
 - 3.8.4 Ensures modifications to CCP procedures, equipment, and facilities undergo FOSC review and USQD.
 - 3.8.5 Ensures new CCP activities follow the LANL readiness review requirements.
 - 3.8.6 Ensures facility modifications requested by CCP or WDP are performed in a timely manner in accordance with an adequately defined job request.
 - 3.8.7 Provides temperature-controlled environment for staging waste containers prior to HSG Sampling.
 - 3.8.8 Provides Lockout/Tagout (LO/TO) support for work performed on the CCP equipment.
 - 3.8.9 Provides work control resources for corrective or preventive maintenance on LANS-owned utilities or equipment or on CCP-owned equipment, as requested.
 - 3.8.10 Performs the USQDs to evaluate WDP operations and ensures WDP activities are performed in accordance with the DSA.
 - 3.8.11 Ensures facility-specific training requirements for CCP and WDP operations at Technical Area (TA)-50 and TA-54 are defined, training plans are established and implemented, and information on training status is provided to CCP Training.
 - 3.8.12 Ensures notification is made to CCP or WDP tenants of any new training requirements.

- 3.8.13 Provides Radiological Control Technician (RCT) support and dosimetry for characterization and transportation operations.
- 3.8.14 Provides Industrial Hygiene support for characterization and transportation operations.
- 3.8.15 Participates in Readiness Assessments or surveillances, as required.
- 3.8.16 Performs Technical Safety Requirements (TSR) surveillances as required.
- 3.8.17 Ensures Fire Protection and other facility surveillances, are performed when required.
- 3.8.18 Provides support for LANS-owned equipment under a LANL-approved Configuration Management Program.
- 3.8.19 Provides forklift support, primarily for mining of drums.
- 3.9 NDA Team Leader
 - 3.9.1 Maintains nuclear material source control in accordance with LANS requirements.
- 3.10 LANL Industrial Hygiene Support
 - 3.10.1 Responsible for workplace monitoring to include, as applicable, monitoring for volatile organic compounds, noise, cryogenics, beryllium, asbestos and other hazardous materials.
 - 3.10.2 Responsible for OSHA compliance reviews, for reviewing and approving IWDs, and for assuring compliance with the LANL safety and health requirements applicable to the CCP operations at LANL.

4.0 INTERFACE

4.1 Initial Setup for Operations

4.1.1 The initial setup and startup of CCP characterization operations have been completed. In addition, the initial certification audit is complete and operations have commenced.

4.1.2 The Host site will provide infrastructure support as additional pieces of equipment or operations are added to the LANL scope.

4.2 Routine Operations

NOTE

Working shifts will be established by the CCP VPM and approved by the EWMO Facility Operations Director Division Leader prior to implementation.

4.2.1 General Conditions of Operation

- [A] The Host site has the overall responsibility for the management of the nuclear materials and operations of the nuclear facilities.
- [B] Work performed by CCP personnel (including subcontractors) will be in compliance with Host site and CCP requirements.
- [C] CCP personnel will STOP WORK and will notify Host site supervision and the CCP VPM in the event of a safety concern (e.g., TSR violation, PAAA violation, breached container, emergency).
- [D] CCP personnel will follow CCP-PO-005, *CCP Conduct of Operations*, for reporting employee concerns or abnormal conditions.
- [E] Authorization Basis (AB) and Configuration Management
 - [E.1] The Host site has primary responsibility to ensure that CCP equipment and processes have been appropriately considered within the DOE-approved Host site DSA.

- [E.2] The Host site shall provide to CCP, Host site generated AB documentation concerning CCP related activities and equipment, including USQDs, for CCP's review.
- [E.3] CCP has primary responsibility to control operations and CCP-provided equipment configurations to ensure compliance with CCP and Host site procedures that protect the personnel, the public, and the environment.
- [E.4] For CCP provided equipment, CCP will provide the documentation necessary for the Host site to perform the evaluation against its safety analysis. This documentation may include HSPs, hazard assessments, system descriptions, equipment drawings, or other information deemed necessary through mutual agreement between CCP and the Host site.
- [E.5] For Host site-provided equipment, CCP will review operational and AB documentation, including USQDs, prior to assuming operation of the equipment to ensure the protection of personnel, the public, and the environment.
- [E.6] All changes to equipment operated by CCP will be controlled by the Host site Work Control Program to ensure appropriate AB evaluations are conducted, and associated controls established.
- [E.7] The Host site will submit all changes to AB requirements that affect CCP operations to CCP for review and concurrence prior to implementation.

4.2.2 CCP VPM or Designee will perform the following activities to support daily operations:

- [A] Ensure that work is performed in accordance with LANL requirements (e.g., LO/TO, Work Control, IWD) by trained and qualified personnel in accordance with approved work documents.

- [B] Suspend work and notify the LANL/CCP Project Manager/Designee and EWMO Facility Operations Director (FOD)/designee when appropriate, and others as needed.
- [C] In the event of abnormal condition or occurrence, support an investigation, as required.
- [D] Accept custody of waste containers delivered by LANL personnel and control approved waste characterization activities.
- [E] Disposition NCRs and CARs as required, and communicate progress to the LANL/CCP Project Manager/Designee and WDP Project Director.
- [F] **IF** after EA review, the NDA results indicate greater than 200 Fissile Gram Equivalent (FGE) (measured value plus two times the counting statistics) for a 55-gallon container **THEN** notify the Operations Center and provide results (per LAUR-07-08126, *Summary and Recommendation for TA-54 Drums >200 FGE*).
- [G] Ensure that equipment calibration is performed on CCP operated equipment, in accordance with Section 4.21.
- [H] Maintain and monitor the LOQIs to ensure that only qualified personnel perform waste characterization activities.
- [I] Attend pre-operations briefings performed for all on-site waste characterization personnel and attend the LANS Plan of the Day/Week briefings, as appropriate.
- [J] Ensure the safe operation and maintenance of all CCP instruments and equipment.
- [K] STOP WORK and notify the Operations Center, CCP QA, and WDP Project Director and LANL/CCP Project Manager/Designee in the event of a safety concern (e.g., TSR violation, PAAA violation, breached container, emergency).
- [L] Ensure the safe operation of equipment by CCP personnel by performing periodic oversight.

- [M] Ensure that CCP-provided equipment is properly maintained.
 - [N] Provide a copy of material safety data sheets (MSDSs) to the Operations Center, the LANL/CCP Project Manager/Designee, WDP Production Controls Manager, and the EWMO-TWOM, and others as appropriate.
 - [N.1] When new chemicals are to be used, the MSDS will be provided to EWMO FOD prior to use to ensure that the Chemical Inventory requirements are updated.
- 4.2.3 EWMO-TWOM will ensure the following radiological control support is provided for CCP activities:
- [A] Maintain radiological postings.
 - [B] Perform an initial and periodic radiation protection surveys on NDA and NDE equipment and provide an approved survey report to the NDA Team Leader or NDE Team Leader, and the VPM.
 - [C] Perform radiation protection surveys and monitoring as necessary.
 - [D] Provide thermoluminescent dosimeters (TLDs) for CCP personnel.
 - [E] Provide calibrated and source checked survey instrumentation as required.
 - [F] Issue and/or modify Radiation Work Permits (RWPs) to support CCP activities as needed.
- 4.2.4 CCP personnel will work under the EWMO-TWOM requirements for LO/TO.
- 4.2.5 CCP personnel will perform work in accordance with CCP-approved procedures for waste characterization and certification activities and LANS-approved work packages for non-waste characterization activities (e.g., equipment repairs). Both CCP-approved and LANS-approved processes will comply with LANL requirements.
- 4.2.6 CCP personnel will operate in accordance with CCP-PO-005.

4.2.7 CCP personnel with assistance from LANS IH Safety will develop IWDs or other applicable documents for all CCP activities performed at LANL in accordance with LANS policies and submitted to the EWMO-TWOM Team Lead for approval.

4.3 Training

4.3.1 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 LANL shall complete required LANL site, facility, and job-specific training. Both the WIPP (technical) training and LANL-specific training must be completed prior to the individual being qualified to perform work at LANL.

4.3.2 An LOQI will be posted at locations established by the CCP VPM and monitored daily by the CCP VPM to confirm personnel are in compliance with the training and qualification requirements in CCP-QP-002 and LANL site-specific training requirements.

[A] This documentation shall be available on the file transfer protocol (ftp) site for all personnel to review their qualification status.

4.3.3 The EWMO Training Coordinator or designee will provide LANL institutional and site-specific training requirements to CCP as established in the TA-54 Health and Safety Plan. This listing does not apply to the OSRP. For non-OSRP workers, this training includes the following as required by job task:

[A] HAZWOPER

[B] RadWorker II

[C] LANL General Employee Training (GET) (one time only)

[D] Resource Conservation and Recovery Act (RCRA) and Waste Management Training

[E] Facility-specific training

[F] Security training

- 4.3.4 The EWMO Training Coordinator or designee will notify the CCP SPM whenever LANS training requirements have been modified.
 - 4.3.5 OSRP personnel require LANL GET, RadWorker (if field work is performed), and Facility-specific training, as applicable.
 - 4.3.6 LANL will provide to the CCP SPM the documentation of completion of LANL site-specific training for personnel performing work under the CCP Certified Program.
 - 4.3.7 LANS Training records for CCP personnel shall be submitted to and maintained by CCP and EWMO training staff.
 - 4.3.8 EWMO on-the-job training (OJT) instructor/evaluators shall comply with LANS training and qualification program.
 - 4.3.9 CCP OJT instructors/evaluators shall comply with CCP's training and qualification program.
 - 4.3.10 CCP and EWMO shall meet the LANL and CCP training records requirements regarding training records. A complete set of requirements documents and records shall be maintained by EWMO (the responsible LANL organization) training staff for audit/assessment purposes.
- 4.4 Employee Monitoring
- 4.4.1 CCP personnel will participate in the LANL Bioassay Program, as required. Required CCP personnel will provide samples as requested under the program established by LANS and will submit the bioassay samples required to establish a baseline for activities.
 - 4.4.2 LANL will analyze bioassay samples provided by CCP personnel within 60 days of their receipt.
 - 4.4.3 The LANL/CCP Project Manager or CCP VPM will be notified if any bioassay sample provided by CCP personnel indicates that an uptake of material/waste may have occurred as soon as is reasonably possible.

- 4.4.4 LANS Radiological Controls personnel will perform routine surveys and monitoring for contamination and radiation as specified in LANS policies or procedures. The LANL/CCP Project Manager/Designee or CCP VPM and appropriate LANL management personnel will be notified immediately upon the discovery of any loose surface contamination on any CCP-operated characterization equipment. Access to copies of routine survey results will be made available to CCP upon request.
- 4.4.5 LANS will provide the LANL/CCP Project Manager/Designee or CCP VPM with the results of continuous or fixed air sample filter analysis within 21 days of the removal of the filter from the sampler head, in any monitored area routinely occupied by CCP personnel.
- 4.5 Container Management
- 4.5.1 LANS will provide waste managed as TRU waste in 55-gallon drums, 85-gallon drums, and standard waste boxes (SWBs) to the characterization facilities, depending upon certification and characterization capabilities. All Contact Handled (CH) containers delivered for characterization will be approved by the CCP VPM as prescribed in CCP-TP-120, *CCP Container Management*.
- 4.5.2 LANS is responsible for providing documented information to the CCP SPM/designee on any modification to the drum or container after the AK has been completed by CCP.
- 4.5.3 The CCP SPM/designee will review the documented information for modified containers and will notify the WDP Production Controls Manager when the containers are approved for entrance into the characterization process.
- 4.5.4 LANS is responsible for movement of containers and implementing vehicle access controls, from characterization through shipment, including control of containers requiring remediation (prohibited items).
- [A] Subcontractor support for container movement and management may be provided through CCP, provided personnel meet LANS training requirements.
- [B] LANS and CCP will perform site container management in accordance with the applicable LANL and CCP procedures. This includes verification that the containers are included in the AK Tracking Spreadsheet for characterization by CCP.

- 4.5.5 CCP is responsible for administratively tracking the containers throughout the CCP characterization processes. Personnel will perform container management in accordance with CCP-TP-120.
- 4.5.6 LANS will provide the necessary dose rate and surface contamination information to CCP to certify the containers for disposal, (e.g., survey results). All containers will have a Health Physics Materials Survey tag attached to the container prior to movement to CCP for characterization.
- 4.5.7 If a nonconformance is identified with a drum, during the characterization or certification process, the drum will be controlled in accordance with CCP-QP-005, *CCP TRU Nonconforming Item Reporting and Control*.
- 4.6 Deficiencies
- 4.6.1 If either LANS or CCP personnel, identify a nonconformance condition associated with a waste container during the characterization or certification process, personnel will initiate an NCR in accordance with CCP-QP-005.
- 4.6.2 The CCP Project Manager/Designee will notify the WDP Production Controls Manager of nonconformances by the distribution of NCRs. The WDP Production Controls Manager may request any supporting documentation needed by LANS.

NOTE

In some cases, LANS will perform the work required to resolve deficiencies identified in CCP NCRs and will initiate internal documentation as required by the LANL 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 under its program. At that point, CCP will close the NCRs and remove the NCR Tags.

- 4.6.3 If the nonconformance can **NOT** be resolved by CCP (e.g., certain prohibited items or non-certifiable container types), CCP will coordinate with LANS to determine the actions to be taken.
- 4.6.4 CCP will notify the EWMO-TWOM, EWMO FOD, WDP Director, and the LANL/CCP Project Manager/Designee immediately of occurrence reports or potential PAAA issues resulting from the CCP scope of work.

- 4.6.5 The CCP QA will confirm appropriate closure of deficiencies.
- 4.7 Visual Examination (VE), Repackaging, and Prohibited Item Disposition (PID)
 - 4.7.1 Glovebox operations will have oversight by CCP qualified VE Personnel, as required.
 - 4.7.2 The CCP training programs for VE and VE technique will include OJT training. Personnel performing VE are instructed in the waste generating processes, typical packaging configurations, and waste material parameters expected to be in each Waste Matrix Code at LANL.
 - 4.7.3 PID will be conducted on containers in accordance with approved Host site procedures with oversight by CCP VE trained personnel, as required.
- 4.8 Filter Inspection/Filter Changeout
 - 4.8.1 LANL/CCP personnel will inspect the filters on containers as part of the container acceptance and will document whether the filter is a WIPP-approved filter. This information will be transmitted to the CCP VPM.
 - 4.8.2 Filter changeouts will be performed on containers that do not require repackaging. This operation will be documented and the information transmitted to the CCP VPM.
 - 4.8.3 LANL/CCP personnel also inspect and verify filter models on containers as part of the HSG/FGA sampling and any filter changeouts that occur immediately following HSG/FGA sampling.
- 4.9 Prescreen Nondestructive Examination (NDE)
 - 4.9.1 CCP personnel will perform prescreening for NDE to identify potentially certifiable containers that can be sent to NDE, as directed by LANL. This information will be documented and provided to the WDP Production Controls Manager.

4.10 Prescreen Nondestructive Assay (NDA)

4.10.1 CCP personnel will perform prescreening for NDA as directed by LANS. This information will be documented and provided to the WDP Production Controls Manager.

[A] Drums that are less than 100 nanocuries per gram (nCi/g) will be returned to the Host site for disposition. BDR information on these drums will be provided as part of the process of returning the drums to LANL.

4.11 Nondestructive Examination (NDE)

4.11.1 NDE will be performed by personnel trained under the CCP Certified Program.

4.11.2 Containers found with prohibited items or conditions requiring remediation (e.g., unvented container liner, liquids other than residual liquids in internal containers and the shipping container) will be flagged, an NCR initiated, and staged for remediation at a later date.

[A] NDE Operators will notify the Operations Center if containers are found to contain compressed gas cylinders.

4.11.3 If a container is found during NDE that is suspected to contain a classified shape, it will be segregated and handled in accordance with LANL procedures.

[A] The information generated during the NDE of the drum will be subject to control of potentially classified information. This media will be redacted by LANS, as possible, to remove the potentially classified portion and the revised media will be returned to CCP to complete the associated BDR.

4.11.4 CCP NDE Operators may provide additional interpretation of scans to support other LANS repackaging activities as determined by LANS and agreed to by the LANL/CCP Project Manager/designee.

4.12 Nondestructive Assay (NDA)

4.12.1 NDA will be conducted using certified equipment with personnel trained under the CCP Certified Program.

- 4.12.2 **IF** assay results are greater than facility AB limits for Plutonium Equivalent Curies (PE-Ci),
THEN NDA personnel will immediately notify the Operations Center, the LANL/CCP Project Manager/Designee, and the CCP VPM.
- [A] The limit for individual 55-gallon drums of debris waste is 80 PE-Ci.
- [B] The limit for 55-gallon drums of solidified waste is 1200 PE-Ci.
- [C] The limit for overpack containers, SWBs, or metal waste boxes is 1100 PE-Ci.
- 4.12.3 **IF** assay results are greater than the following criticality spacing limitations,
THEN the Expert Analyst (EA) will notify the Operations Center, the LANL/CCP Project Manager/Designee and the CCP VPM.
- [A] Individual 55-gallon drums of waste exceeding 200 FGE (measured value).
- [B] Containers found to exceed the calibration range of the NDA machine.
- 4.12.4 If assay results indicate that a drum exceeds the Waste Acceptance Criteria (WAC) limits for plutonium equivalent activity, and/or FGE criteria, CCP personnel will issue an NCR in accordance with CCP-QP-005.
- 4.12.5 For any drums that exceed the shipping limit for FGE, an NCR will be generated in accordance with CCP-QP-005 to return the drums to LANL for repackaging.
- 4.12.6 For any drums that are less than 100 nCi/g, an NCR will be generated in accordance with CCP-QP-005 to return the drums to LANS.
- 4.12.7 LANS will provide/refill the dewar required for the liquid nitrogen for NDA.

4.13 Source Control

4.13.1 LANS will be responsible for NDA sources used for both calibration (reference sources) and for the DOE/CBFO PDP. Responsibilities include inventory control, storage, inspection and handling. Responsibilities include ensuring radiological control support associated with sources is provided, maintaining the Radioactive Materials Area (RMA) postings and periodic surveys, and performing a semi-annual leak check on the reference sources.

4.13.2 LANS will provide support for the participation in the NDA PDP. This support includes training PDP coordinators, preparation of the test matrix drums, delivery of the drums to the NDA equipment, and responsibility for PDP source control. LANS support will be coordinated by the WDP Production Control Manager.

4.13.3 LANS, as custodian of the sources, will provide to CCP the necessary reference sources for calibration in accordance with CCP NDA calibration procedures.

4.14 Headspace Gas (HSG) Sampling

4.14.1 HSG Random Sampling for SUMMA[®] will be conducted using certified equipment with personnel trained under the CCP Certified Program.

4.14.2 If CCP personnel perform HSG sampling operations, in addition to the standard approved procedure requirements, the following guidelines will apply:

[A] CCP will review drums that exceed program limits against the current revision of CCP-PO-003, *CCP Transuranic Authorized Methods for Payload Control (CCP CH-TRAMPAC)* for determination of suitability for shipment.

[A.1] The Operations Center, the LANL/CCP Project Manager/Designee, and the CCP VPM will be notified if the 55-gallon drums exceed the following:

- (a) >500 ppm flammable volatile organic compounds (VOCs)
- (b) >5% Hydrogen
- (c) >1,250 ppm Methane

- [B] CCP personnel will provide HSG samples to LANS (SUP-5) and LANS will ship samples to the Idaho National Laboratory (INL) certified laboratory for analysis.
- [C] Host site shall provide the radiation survey results for all HSG sample canisters showing canisters meet free release requirements with each canister to be shipped to the INL laboratory for analysis.

4.15 Flammable Gas Analysis (FGA)

4.15.1 FGA is for transportation only and will be performed using approved DOE/WIPP procedures by personnel trained under the CCP Qualification Program. This includes Off-Site Source Recovery Program (OSRP) containers, as required.

4.15.2 The Operations Center, the LANL/CCP Project Manager/Designee, and the CCP VPM will be notified if after completion of the analysis, the 55-gallon drums exceed the following:

- [A] >500 ppm flammable VOCs
- [B] >5% Hydrogen
- [C] >1,250 ppm Methane

4.16 Acceptable Knowledge (AK)

4.16.1 CCP records personnel in Carlsbad will maintain the auditable AK record necessary to support the AK Summary Report in accordance with CCP-PO-001, *CCP Transuranic Waste Characterization Quality Assurance Project Plan*, and CCP-QP-008, *CCP Records Management*.

4.16.2 AK personnel will perform and document the AK collection, reporting, and confirmation of AK in accordance with CCP-TP-005, *CCP Acceptable Knowledge Documentation* and DOE/WIPP-02-3214, *Remote-Handled TRU Waste Characterization Program Implementation Plan*. CCP shall submit the AK Summary Report for WDP Production Controls Manager review.

- 4.16.3 As determined by the LANL Waste Disposition Project Director, the assigned LANS staff will provide written comments to be dispositioned by CCP before CCP document approval. Disposition of comments on the AK Summary Report is tracked in accordance with CCP-QP-010, *CCP Document Preparation, Approval and Control*.
- 4.16.4 NCRs that identify possible changes to the AK of a waste stream (Trend Code L) require evaluation by the CCP SPM to determine if an AK Expert investigation is warranted.
- 4.16.5 Containers less than 100 nCi/g will be moved from the AK Tracking Spreadsheet to a separate tab prior to closure of the NCR.
- 4.17 Off-Site Source Recovery Program
- 4.17.1 OSRP VE and Radiological Characterization will be conducted using certified equipment with personnel trained under the CCP Certified Program.
- 4.17.2 The OSRP uses a separate procedure for VE and packaging. In addition, it uses AK documentation in combination with calculations, in lieu of NDA.
- 4.17.3 Prior data for Off-Site Source Recovery (OSR) containers generated under the LANL Certified Program will be evaluated for acceptability into the CCP Certified Program.
- [A] The previous BDRs will be reviewed and validated at the CCP Project Office prior to acceptance into the program.
- [B] If the data validators at the CCP Project Office are unable to verify the data, the BDRs will not be accepted and will require re-generation under the CCP program.
- [C] OSRP containers are weighed and inspected prior to being added to the AK Tracking Spreadsheet.
- 4.18 CCP Project Office Certification Activities
- 4.18.1 CCP Project Office certification activities consist of project-level review of BDRs, lot evaluations, data validation, and WIPP Waste Information System (WWIS) data entry. CCP Project Office certification activities will be conducted using personnel trained under the CCP Certified Program.

- 4.18.2 Data validators are responsible for completing the required checklists, resolving comments, and ensuring records are complete.
 - 4.18.3 WWIS personnel will ensure information is entered into WWIS in accordance with CCP-TP-030, *CCP CH TRU Waste Certification and WWIS Data Entry*, and CCP-TP-530, *CCP RH TRU Waste Certification and WWIS Data Entry*.
 - 4.18.4 The Waste Certification Official (WCO) will certify and transmit characterization and certification data using the WWIS and approved procedures.
 - 4.18.5 The WCO will document and certify that all TRU waste payload containers prepared from the certified process for WIPP meet all of the requirements of DOE/WIPP-02-3214, CCP-PO-001, CCP-PO-002, *CCP Transuranic Waste Certification Plan*, and CCP-PO-003, *CCP Transuranic Authorized Methods for Payload Control (CCP CH-TRAMPAC)* or CCP-PO-505, *CCP Remote-Handled Transuranic Waste Authorized Methods for Payload Control (CCP RH-TRAMPAC)*.
 - 4.18.6 The WCO will transmit information to the CCP Records in accordance with CCP-TP-030 and CCP-TP-530.
 - 4.18.7 The WCO will provide the Transportation Certification Official (TCO) with all certification information necessary to certify the payload for transportation.
- 4.19 Transportation to WIPP
- 4.19.1 Transportation certification, preparation of the shipment of certified packages (i.e., Transuranic Package Transporter-II [TRUPACT-II], HalfPact, or RH 72-B Cask), and shipment of the waste will be conducted using personnel trained under the CCP Certified Program.
 - 4.19.2 CCP will provide TRUPACT-II, HalfPACT and RH loading training to LANL employees, as required, to maintain certifications required for transportation activities.
 - 4.19.3 LANL 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.

- 4.19.4 LANL will verify and ensure that drums being shipped to Radioassay and Nondestructive Testing (RANT) or the loading area do not exceed authorization basis MAR inventory.
- 4.19.5 LANL will track MAR inventory at RANT onsite, RANT facility, or other loadout facility.
- 4.19.6 The 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.
- 4.19.7 Waste will be loaded and prepared for transport to WIPP in accordance with DOE-approved operating procedures.
- 4.19.8 The TCO will provide documentation to the WDP Production Coordination Manager certifying the waste for shipment in accordance with CCP procedures.
- 4.20 Remote-Handled (RH) Waste Program
 - 4.20.1 CCP personnel and LANS personnel will establish the RH Program at LANL (16 canisters).
 - 4.20.2 Specific roles and responsibilities will be established for personnel under the CCP RH Program.
 - 4.20.3 LANL will supply information and support as established in the Baseline Change Proposal for this scope of work.
- 4.21 Measurement and Test Equipment (M&TE)
 - 4.21.1 CCP characterization personnel will provide a list of equipment that requires calibration to the LANL/CCP Project Manager/Designee and the CCP M&TE Custodian. M&TE requiring calibration will include such things as weight scales, infrared thermometers, temperature data-loggers, electronic calibrators, digital readouts, and pressure transducers.
 - 4.21.2 LANS will provide National Institute of Science and Technology (NIST)-traceable calibration services for specified M&TE. LANS will maintain records on M&TE calibration in accordance with its Qualified Suppliers List (QSL)-accepted program. LANS will provide copies of the Certificates of Calibration for these items of M&TE to the CCP VPM and the CCP M&TE Custodian via the LANL/CCP Project Manager/Designee.

4.21.3 LANS will provide a certified scale for VE operations and provide calibration documentation to CCP in accordance with CCP procedures as required.

4.22 Procedures

4.22.1 Editorial or minor changes may be made without the same level of review and approval as the original document as defined in CCP-QP-010.

4.22.2 New Technical Operating Procedures (procedures that operate equipment) developed by CCP scheduled to be used at the host site, shall be evaluated by the Host facility WDP Production Control Manager to determine if the procedure shall be added to the Host facility review lists defined in step 4.22.4.

4.22.3 All characterization procedures, which physically manipulates the waste (e.g., VE) or the waste container (e.g., NDE or NDA) and all revisions to these procedures, will be provided to the EWMO FOD, EWMO/TWOM, WDP Project Director, by the LANL/CCP Project Manager/Designee for FOSC review (e.g., USQD, AK evaluation, Health & Safety Review and Implementation), before approval by DOE/CBFO and implementation by CCP.

4.22.4 The WDP Project Director, EWMO FOD/designee, LANL/CCP Project Manager/Designee will review or designate the appropriate reviews of the procedures listed below (which do not meet the criteria of step 4.22.1 and do not affect the AB) and forward written comments to CCP Document Control in accordance with CCP-QP-010 or LANL Document Control in accordance with EP-DIR-SOP-4001, *Document Control*, for resolution.

CCP Procedures:

- AK Summary Reports
- CCP-CM-003, *CCP High-Efficiency Neutron Counter (HENC1) (Equipment #NDA-HENC-01)*
- CCP-CM-018, *CCP Real Time Radiography MCS Unit #3 LANL Unit #2 (RTR #2) (Equipment #NDE-RTR-03/LANL-RTR-02)*
- CCP-CM-028, *CCP Real-Time Radiography LANL Unit #1 (Equipment #LANL-RTR-01)*

- CCP-CM-024, *CCP High-Efficiency Neutron Counter (HENC2) (Equipment #NDA-HENC-02)*
- CCP-HSP-007, *CCP Health and Safety Program Plan for Operation at LANL*
- 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-063, *CCP Operating the High Efficiency Neutron Counter Using NDA 2000*
- CCP-TP-064, *CCP Calibrating the High Efficiency Neutron Counter Using NDA 2000*
- CCP-TP-069, *CCP Sealed Source Visual Examination and Packaging*
- CCP-TP-082, *CCP Preparing and Handling Waste Drums for Headspace Gas*
- CCP-TP-086, *CCP CH Packaging Payload Assembly*
- CCP-TP-093, *CCP Sampling of TRU Waste Containers*
- CCP-TP-098, *CCP Installation of the NucFil HSG Sample Port*
- CCP-TP-101, *CCP OSR Sealed Source Radiological Characterization*
- CCP-TP-113, *CCP Standard Waste Visual Examination*
- CCP-TP-120, *CCP Container Management*
- CCP-TP-121, *CCP RTR #1 Operating Procedure*
- CCP-TP-122, *CCP RTR #2 Operating Procedure*

- CCP-TP-554, *CCP Remote-Handled Grapple Pre-Operational Checks and Operation*

LANL Procedures:

- LAUR-07-08126, *Summary and Recommendation for TA-54 Drums >200 FGE*
- TA-54, *Area G Security Plan*, May 2008
- TRU-DOP-0329, *TSR Specific Administrative Control Implementation of HENC and RTR Operations*
- TRU-DOP-0330, *Real Time Radiography (RTR) Quick Scan Operations*
- TRU-DOP-0331, *Operating the Quick Scan RTR (Cabinet) System*
- TRU-DOP-0333, *Operation of Gamma Spectroscopy Systems for Screening Nuclear Waste Using a Non-Destructive Assay Methodology*

4.22.5 The WDP Project Director and the EWMO FOD will confirm that written comments from LANS are resolved, and will obtain EWMO-TWOM concurrence prior to proceeding with operations.

4.23 Documents/Records

4.23.1 All AK documents generated at LANL must be reviewed prior to release by an Authorized Derivative Classifier (ADC) as detailed in ADC guidance documents. LANS' governing document is LIR 406-00-01, *General Security*.

4.23.2 In addition, any document created by CCP or LANS that is intended for public release must be reviewed and processed for Unclassified Controlled Nuclear Information (UCNI) review and Public Release review prior to release. LANS' governing document is Attachment 10 of LIR 406-00-01, *UCNI and DOE M 475.1-1 for Public Release*.

4.23.3 Documents listed in steps 4.23.4 and 4.23.5, which are provided from one organization to the other as information copies, may be transmitted via memo, fax, e-mail, or formal correspondence.

4.23.4 Documents to be provided by LANS after completion of ADC review to CCP personnel include copies of the following:

- [A] Existing AK documentation including, but not limited to: source documents, spreadsheets, NCR/CAR, VE, PID information, and characterization raw data.
- [B] Changes to drum data information after AK has been collected and/or reconciled.
- [C] Previous BDRs prepared under the LANL Certified Program and associated information needed to qualify previous LANL data.

4.23.5 Documents to be provided by CCP (No ADC review required) to LANL personnel, as applicable, include copies of the following:

- [A] Completed BDRs for all processes.
- [B] Copy of WSPF for concurrence.
- [C] Copy of AK Summary Reports for concurrence.
- [D] Lot Evaluation documentation.
- [E] Completion of CCP Training/LOQI updates.
- [F] AK Tracking Spreadsheet.
- [G] NCRs and CARs generated.
- [H] Other reports generated to support a certified program.
- [I] Daily Production Reports.

4.23.6 Documents that are generated during the implementation of the WDP at LANL will be processed through the CCP Records process in accordance with CCP-QP-008. After completion of all activities, these records will be turned over to LANL and the end of the project.

4.24 Procurement

4.24.1 Qualified LANS personnel may procure, inspect, and perform receipt inspection of U.S. Department of Transportation (DOT)

Type 7A drums, filters, gases and various non-quality affecting items for certified CCP operations in accordance with LANL procurement requirements.

4.24.2 LANS personnel will perform procurement activities in accordance with its QSL-accepted program.

4.24.3 CCP may procure, inspect, and perform receipt inspection of quality-affecting items [e.g., U.S. Department of Energy (DOE) Type 7A drums, filters, and gases] and various nonquality affecting items for certified operation in accordance with CCP procurement requirements. Quality-related procurements ordered by CCP require a CCP receipt inspection only; they DO **NOT** require a LANL QA receipt inspection. Documentation of these inspections will be made available to the EWMO-QA Manager upon request.

4.24.4 All procurements through CBFO's Central Procurement will require LANL's receipt inspection. These items include, but are not limited to SWBs and pipe overpacks.

4.24.5 All HAZMAT packaging procured or leased by CCP or CBFO shall be in accordance with written specification and receipt inspection plans that have been reviewed and approved by LANL Operations Support Packaging and Transportation (OS-PT). These specifications and plans will be provided by OS-PT with the procurement request documents that are provided to CCP or CBFO.

4.25 Oversight

NOTE

LANS retains the responsibility for proper disposal as the waste owner and generator. Accordingly, this section defines the level of oversight of CCP characterization activities performed by LANS.

4.25.1 LANS will conduct periodic surveillances and/or audits to ensure work is conducted safely in accordance with CCP and LANS procedures. These surveillances and/or audits will be scheduled and conducted in accordance with LANL QA procedures.

4.25.2 The EWMO QA Manager will provide copies of the LANS surveillances and/or audit reports to the LANL/CCP Project Manager/Designee.

- 4.25.3 The LANL/CCP Project Manager/Designee and CCP QA will review the LANL audit and surveillance reports for any findings or other deficiencies against the CCP scope of work.
- 4.25.4 If required, CCP will prepare and process CARS in accordance with CCP-QP-006, *CCP Corrective Action Reporting and Control*, for deficiencies identified during the review.
- 4.25.5 The LANL/CCP Project Manager/Designee will provide the Deputy WDP Director with CCP actions to correct identified deficiencies.
- 4.25.6 The WDP Project Director and EWMO FOD will concur upon or approve of corrective actions taken by CCP in response to LANL surveillances and/or audits.
- 4.26 Notification
- 4.26.1 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.
- 4.26.2 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.
- 4.26.3 The Host site has primary responsibility to notify CCP when repairs or modifications are made to transportation trailers or packaging equipment (TRUPACT-II, HalfPACTs, etc.). CCP will then notify the appropriate cognizant engineer at the WIPP site. The cognizant engineer will verify the modification.
- 4.26.4 The Host site has primary responsibility to notify CCP of required notifications of various container conditions or changes to the notification requirements.
- 4.26.5 CCP has primary responsibility to ensure changes to equipment are in accordance with CCP-CM-001, *CCP Equipment Change Authorization and Documentation*.
- 4.26.6 CCP has primary responsibility to notify the Host site when there are configuration changes to CCP-provided equipment.
- 4.26.7 CCP has responsibility to notify the Operations Center of various container conditions (e.g., FGE) as identified in the previous sections.

- 4.27 Occurrence Reporting and Processing System (ORPS) and Price-Anderson Amendments Act (PAAA)
- 4.27.1 Both LANS 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 LANL. This includes filing any Occurrence Reporting and Processing System (ORPS) reports resulting from the characterization activities of TRU waste by CCP.
- 4.27.2 Both LANS and CCP shall invite the other to participate in the investigation of any waste characterization event that results in an ORPS or PAAA report.
- 4.27.3 Both LANS and CCP shall support and participate in investigations when CCP characterization activities result in an ORPS or PAAA report.
- 4.27.4 Within CCP, the WTS Compliance Coordinator serves as the PAAA point-of-contact. Within LANS, the PAAA Coordinator for EWMO Division acts as the PAAA point-of-contact, with roles and responsibilities in accordance with the Host site program.
- 4.27.5 In coordination with the CCP Project Manager/Designee and the CCP VPM, the WTS Compliance Coordinator is responsible for notifying the LANS PAAA point-of-contact for any occurrences or conditions related to CCP characterization operations that are an actual or potential noncompliance to the Area G, RANT or Waste Characterization, Reduction, and Repackaging Facility (WCRRF) AB, and for any occurrences or conditions that are an actual or potential noncompliance to the CCP Certified Program procedures, implementation of the QA Program (10 CFR 830) or the Radiation Protection Program (10 CFR 835) impacting or potentially impacting nuclear safety, or implementation of the Worker Safety and Health Plan (10 CFR 851) impacting or potentially impacting personnel safety.
- [A] Both parties are responsible for ensuring compliance with their respective programs.
- 4.27.6 The LANS PAAA point-of-contact will notify the WTS Compliance Coordinator of any PAAA noncompliance with the CCP Certified Program. The LANL/CCP Project Manager/Designee is

responsible for ensuring that deficiencies identified within the CCP Program are appropriately documented and forwarded to the WTS Compliance Coordinator.

5.0 RECORDS

- 5.1 Records are generated during the implementation of procedures referenced in this Interface Document. These records are maintained as QA records in accordance with CCP-QP-008. No additional records are generated as a result of this Interface Document.

Attachment 1 – Acronyms and Key Definitions

AB	Authorization Basis
ADC	Authorized Derivative Classifier
AK	Acceptable Knowledge
BDR	Batch Data Report
CAR	Corrective Action Report
CBFO	Carlsbad Field Office
CCP	Central Characterization Project
CFR	Code of Federal Regulations
CH	Contact-Handled
DOE	U.S. Department of Energy
DOT	U.S. Department of Transportation
DSA	Documented Safety Analysis
EWMO	Environmental Waste Management Operations
FGA	Flammable Gas Analysis
FGE	Fissile Gram Equivalent
FOD	Facility Operations Director
FOSC	EWMO Facility Oversight Safety Committee
FTP	File Transfer Protocol
GET	General Employee Training
HENC	High Efficiency Neutron Counter
HSG	Headspace Gas
INL	Idaho National Laboratory
Interface Agreement	An agreement between the CCP and LANL for defining the responsibilities associated with WIPP requirements defined in the reference documents identified in Section 2.2 of the Interface Document.
IWD	Integrated Work Documents
LANL	Los Alamos National Laboratory
LANS	Los Alamos National Security
LASO	Los Alamos Office
LIR	Laboratory Implementation Requirements
LO/TO	Lockout/Tagout
LOQI	List of Qualified Individuals
MAR	Material at Risk
MCS	Mobile Characterization Services
MSDS	Material Safety Data Sheet
M&TE	Measurement and Test Equipment
nCi/g	nanocuries per gram
NA	Nuclear Assurance
NCR	Nonconformance Report
NDA	Nondestructive Assay
NDE	Nondestructive Examination
NIST	National Institute of Science and Technology

Attachment 1 – Acronyms and Key Definitions (Continued)

OJT	On-The-Job-Training
OSR	Off-Site Source Recovery
OSRP	Off-Site Source Recovery Program
PAAA	Price-Anderson Amendments Act
PE-Ci	Plutonium Equivalent Curies
PDP	Performance Demonstration Program
PID	Prohibited Item Disposition
PMP	Performance Management Plan
QA	Quality Assurance
QAPD	Quality Assurance Program Document
QSL	Qualified Suppliers List
RANT	Radioassay and Nondestructive Testing
RCRA	Resource Conservation and Recovery Act
RCT	Radiological Control Technician
RDL	Responsible Division Leader
RH	Remote-Handled
RMA	Radioactive Materials Area
RWP	Radiation Work Permit
SOW	Statement of Work
SPM	Site Project Manager
STR	Subcontract Technical Representative
SWB	Standard Waste Box
TA	Technical Area
TCO	Transportation Certification Official
TLD	Thermoluminescent Dosimeters
TRAMPAC	Transuranic Authorized Methods for Payload Control
TRU	Transuranic
TRUPACT	Transuranic Package Transporter
TRUPACT-II	Transuranic Package Transporter Model II
TRU Waste	Waste containing more than 100 nanocuries (nCi) of alpha emitting Transuranic isotopes per gram of waste with half-lives >20 years [for payload containers]
TWOM	TRU Waste Operations Manager
TSR	Technical Safety Requirements
UCNI	Unclassified Controlled Nuclear Information
USQD	Unreviewed Safety Question Determination
VE	Visual Examination
VPM	Vendor Project Manager
WAC	Waste Acceptance Criteria
WAP	Waste Analysis Plan
WCO	Waste Certification Official
WCRRF	Waste Characterization, Reduction, and Repackaging Facility

Attachment 1 – Acronyms and Key Definitions (Continued)

WDP	LANL Transuranic Waste Disposition Project
WIPP	Waste Isolation Pilot Plant
WIPP Requirements	Requirements contained in references identified in documents contained in Section 2.2 of the Interface Document
WSPF	Waste Stream Profile Form
WWIS	WIPP Waste Information System
WTS	Washington TRU Solutions

Attachment 2 – Reference Documents

DOE Carlsbad Documents:

- *Waste Isolation Pilot Plant Hazardous Waste Facility Permit, EPA No. NM4890139088-TSDF, Attachment C, Waste Analysis Plan*
- *DOE/CBFO-94-1012, U.S. Department of Energy Carlsbad Field Office Quality Assurance Program Document*
- *DOE/WIPP-02-3214, Remote-Handled TRU Waste Characterization Program Implementation Plan*
- *DOE/WIPP-02-3122, Transuranic Waste Acceptance Criteria for the Waste Isolation Pilot Plant*
- *DOE/CBFO-01-1005, Performance Demonstration Program Plan for Nondestructive Assay of Drummed Wastes for the TRU Waste Characterization Program*
- *DOE/CBFO-95-1076, Performance Demonstration Program Plan for Analysis of Simulated Headspace Gases*

First-Tier Coordination Documents:

- *Statement of Work for Characterization of LANL TRU Waste (Contact Handled and Remote Handled)*
- *FTA-WFM-023, Agreement between FWO-Waste Facility Management and RRES*
- *First-Tier Coordination Documents for the RH TRU Waste Characterization Program Implementation Plan*

First-Tier Certification Documents:

- *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-505, CCP Remote-Handled Transuranic Waste Authorized Methods for Payload Control (CCP RH-TRAMPAC)*

Lower-Tier Documents:

- *CCP-AK-LANL-004, Central Characterization Project Acceptable Knowledge Summary Report For Los Alamos National Laboratory TA-50 Radioactive Liquid Waste Treatment Facility Homogeneous Inorganic Solids Waste Streams: LA-MIN03-NC.001, LA-CIN02.001, LA-MIN02-V.001*

Attachment 2 – Reference Documents (Continued)

Lower-Tier Documents (Continued):

- CCP-AK-LANL-006, *Los Alamos National Laboratory TA-55 Mixed Transuranic Wastes Waste Streams: LA-MHD01.001 LA-CIN01.001*
- CCP-AK-LANL-008, *Central Characterization Project Acceptable Knowledge Summary Report For Los Alamos National Laboratory Off-Site Source Recovery Project Sealed Sources Waste Streams LA-OS-00-01.001 and LA-OS-00-03*
- CCP-AK-LANL-009, *Central Characterization Project Acceptable Knowledge Summary Report For Los Alamos National Laboratory Chemistry and Metallurgy Research (CMR) Facility Waste Stream LA-MHD03.001*
- CCP-AK-LANL-010, *Central Characterization Project Acceptable Knowledge Summary Report for Los Alamos National Laboratory TA-21 DP West Facility Waste Stream LA-MHD04.001*
- CCP-AK-LANL-500, *Central Characterization Project Acceptable Knowledge Summary Report For 16 Canisters of Remote-Handled Transuranic Debris Waste From Los Alamos National Laboratory Chemistry and Metallurgy Research Facility Waste Streams: LA-MHD03.002*
- CCP-AK-LANL-501, *Central Characterization Project Remote-Handled Transuranic Radiological Characterization Technical Report For Remote-Handled Transuranic Debris Waste From Los Alamos National Laboratory*
- CCP-AK-LANL-502, *Central Characterization Project RH TRU Waste Certification Plan for 40 CFR Part 194 Compliance and Confirmation Test Plan for LANL RH Waste Stream: LA-MHD03.002*
- CCP-AK-LANL-503, *Central Characterization Project Los Alamos National Laboratory Quality Assurance Equivalency Report and Procedure Matrix For Remote-Handled Transuranic Debris Waste*
- CCP-AK-LANL-504, *Central Characterization Project Los Alamos National Laboratory Qualification of Passive-Active Neutron Assay System Software*
- CCP-CM-001, *CCP Equipment Change Authorization and Documentation*
- CCP-CM-003, *CCP High-Efficiency Neutron Counter (HENC1) (Equipment #NDA-HENC-01)*
- CCP-CM-018, *CCP Real Time Radiography MCS Unit #3 LANL Unit #2 (RTR #2) (Equipment #NDE-RTR-03/LANL-RTR-02)*
- CCP-CM-024, *CCP High-Efficiency Neutron Counter (HENC2) (Equipment #NDA-HENC-02)*
- CCP-CM-028, *CCP Real Time Radiography LANL Unit #1 (Equipment #LANL-RTR-01)*
- CCP-HSP-007, *CCP Health and Safety Program Plan for Operations at LANL*
- CCP-PO-005, *CCP Conduct of Operations*
- CCP-PO-006, *CCP Conduct of Operations Matrix*

Attachment 2 – Reference Documents (Continued)

Lower-Tier Documents (Continued):

- CCP-PO-008, *CCP Quality Assurance Interface with the WTS Quality Assurance Program*
- CCP-PO-012, *CCP/Los Alamos National Laboratory (LANL) Interface Document*
- CCP-PO-026 *CCP Configuration Management Plan*
- CCP-QP-001, *CCP Graded Approach*
- CCP-QP-002, *CCP Training and Qualification Plan*
- 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-011, *CCP Notebooks and Logbooks*
- CCP-QP-016, *CCP Control of Measuring, Testing, and Data Collection Equipment*
- 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-030, *CCP CH TRU Waste Certification and WWIS Data Entry*
- CCP-TP-033, *CCP Shipping of CH TRU Waste*
- CCP-TP-043, *CCP Chain of Custody for SUMMA[®] Canister Sampling Using the INL Analytical Lab*
- 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-063, *CCP Operating the High Efficiency Neutron Counter Using NDA 2000*
- CCP-TP-064, *CCP Calibrating the High Efficiency Neutron Counter Using NDA 2000*
- CCP-TP-069, *CCP Sealed Source Visual Examination and Packaging*
- CCP-TP-082, *CCP Preparing and Handling Waste Containers for Headspace Gas Sampling*
- CCP-TP-086, *CCP CH Packaging Payload Assembly*
- CCP-TP-093, *CCP Sampling of TRU Waste Containers*
- CCP-TP-098, *CCP Installation of the NucFil HSG Sample Port*
- CCP-TP-101, *CCP Off-Site Source Recovery Project Sealed Source Radiological Characterization*
- CCP-TP-103, *CCP Data Reviewing, Validating, and Reporting Procedure for the High Efficiency Neutron Counter Using NDA 2000*
- CCP-TP-106, *CCP Headspace Gas Sampling Batch Data Report Preparation*
- CCP-TP-113, *CCP Standard Waste Visual Examination*
- CCP-TP-120, *CCP Container Management*

Attachment 2 – Reference Documents (Continued)

Lower-Tier Documents (Continued):

- CCP-TP-121, *CCP RTR #1 Operating Procedure*
- CCP-TP-122, *CCP RTR #2 Operating Procedure*
- CCP-TP-506, *CCP Preparation of the Remote-Handled Transuranic Waste Acceptable Knowledge Characterization Reconciliation Report*
- CCP-TP-507, *CCP Shipping of Remote-Handled Transuranic Waste*
- CCP-TP-530, *CCP RH TRU Waste Certification and WWIS Data Entry*
- CCP-TP-554, *CCP Remote-Handled Grapple Pre-Operational Checks and Operation*
- DOE/WIPP 02-3183, *CH Packaging Program Guidance*
- DOE/WIPP 02-3184, *CH Packaging Operations Manual*
- DOE/WIPP 02-3220, *CH Packaging Operations for High Wattage Waste at LANL*
- DOE/WIPP 02-3283, *RH Packaging Program Guidance*
- DOE/WIPP 02-3284, *RH Packaging Operations Manual*
- DOE/WIPP 02-3285, *RH Packaging Maintenance Manual*
- DOE/WIPP 06-3345, *Waste Isolation Pilot Plant Flammable Gas Analysis*
- WP 08PT.13 RH-TRU 72-B Cask Uprighting Trailer Operation and Maintenance Manual

Attachment 3 – LANS Host Site Required Documents

Upper-Tier LANL Documents:

- Safe Work Practices, IMP 300
- Nuclear Facility Safety Authorization Basis, IMP 112
- Startup/Restart of Laboratory Facilities/Activities, P 115
- Stop Work and Restart, IMP 141
- Cryogenic Fluids or Cryogenics, LIR 402-580-01.2
- Lockout/Tagout for Personal Safety, ISD 101-3
- Locking and Tagging equipment, Machinery and Systems, ISD 101-3
- Personal Protective Equipment, ISD 101-6
- Cranes, Hoists, Lifting Devices, and Rigging Equipment, ISD 101-25
- Pressure, Vacuum and Cryogenic Systems
- LANL Emergency Management, LIR 402-1200-01.1
- General Waste Management Requirements, LIR 404-00-02.4 Hazardous and Mixed waste Requirements, LIR 404-00-03.1
- Managing Radioactive Waste, LIR 404-00-05.4
- Packaging and Transportation, IPP 525.2
- General Security, LIR 406-00-01.1
- Nuclear Safeguards, ISD 201-5
- Abnormal Events, ISD 322-3
- Hazardous Waste Operations and Emergency Response Training Requirements, LIR 402-100-02.2
- LANL Fire Protection Program, PD 1220
- Occupational Radiation Protection Requirements, ISD 121-1
- Facility Management Program, ISD 312-2
- Occupational Radiation Protection Guidance, ISD 121-1
- Hazard Analysis and Control for Facility Work, IMP 300

Lower-Tier LANL Documents:

- EP-DIR-SOP-4001, *Document Control*
- TA-54-PLANL-0201, *TA-54 Health and Safety Plan*
- TRU-DOP-0329, *TSR Specific Administrative Control Implementation of HENC and RTR Operations*
- TRU-DOP-0330, *Real Time Radiography (RTR) Quick Scan Operations*
- TRU-DOP-0331, *Operating the Quick Scan RTR (Cabinet) System*
- TRU-DOP-0333, *Operation of Gamma Spectroscopy Systems for Screening Nuclear Waste Using a Non-Destructive Assay Methodology*

Figure 2. Waste Disposition Project

