

CCP-TP-401

Revision 1

CCP

Process Knowledge Compilation for Preliminary Characterization

EFFECTIVE DATE: 12/29/2010

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PRINTED NAME

APPROVED FOR USE

RECORD OF REVISION

| Revision Number | Date Approved | Description of Revision |
|-----------------|---------------|---|
| 0 | 10/27/2008 | Initial Issue. |
| 1 | 12/29/2010 | Revised to implement the revision of the <i>Waste Isolation Pilot Plant Hazardous Waste Facility Permit</i> . |

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1.0 PURPOSE

The Central Characterization Project (CCP) is tasked with characterization and transportation of transuranic (TRU) waste between sites. Implementation of this procedure will generate information required by CCP-PO-401, *CCP Contact-Handled Transuranic Authorized Methods for Payload Control (CCP CH-TRAMPAC) for Intersite Shipments*, to allow for the shipment of TRU waste between sites.

The methods employed in this procedure will mirror those required by the *Waste Isolation Pilot Plant Hazardous Waste Facility Permit, Waste Analysis Plan (WIPP WAP)*, NM4890139088, for the development of acceptable knowledge (AK) documentation. For this reason, the process knowledge (PK) resulting from the implementation of this procedure will include documentation to be used as AK by the receiving site's certified waste characterization program. This procedure applies to CCP personnel who perform PK activities for retrievably stored and newly generated TRU waste streams that may be eligible for disposal at WIPP.

1.1 Scope

This procedure describes the processes the CCP uses to compile, review, evaluate, update, and report PK documentation. The procedure also describes how the CCP resolves PK documentation discrepancies; and uses PK to delineate waste streams and determine whether the waste is hazardous. A waste stream is defined as waste materials that have common physical form, that contain similar hazardous constituents, and that are generated from a single process or activity.

Only CCP personnel trained in accordance with CCP-QP-002, *CCP Training and Qualification Plan*, will compile, evaluate, and document PK information in accordance with this procedure. Sites may assist CCP personnel in the collection of PK information; however, this procedure will be used by the CCP to generate the required PK in accordance with CCP-PO-401.

PK includes any documentation that describes or verifies site history, mission, and operations, in addition to waste stream-specific information used to define the generating process, waste matrix, waste quantities and contaminants (radiological and chemical). Additionally, PK includes available characterization data for containers to be shipped (e.g., radiography, visual examination [VE], assay, and headspace gas).

The attached forms are provided as examples for the required PK information to be prepared for CCP Records. The forms identify the

minimum information that will be prepared to document the PK collection and review process described in this procedure.

2.0 REQUIREMENTS

2.1 References

Baseline Documents

- DOE/WIPP 89-004, *TRUPACT-II Content Codes (TRUCON)*, Carlsbad, New Mexico, U.S. Department of Energy

Referenced Documents

- DOE/LLW-217, *DOE Waste Treatability Group Guidance*, Idaho Falls, Idaho, INEEL-Lockheed Idaho Technologies
- DOE/TRU-06-3344, *Transuranic Waste Baseline Inventory Report*, Carlsbad, New Mexico, U.S. Department of Energy
- DOE/WIPP-02-3214, *Remote-Handled TRU Waste Characterization Program Implementation Plan*, Carlsbad, New Mexico, U.S. Department of Energy
- 20 NMAC 4.1, New Mexico Administrative Code
- 40 CFR Part 261, *Identification and Listing of Hazardous Waste*
- CCP-PO-001, *CCP Transuranic Waste Characterization Quality Assurance Project Plan*
- CCP-PO-002, *CCP Transuranic Waste Certification Plan*
- CCP-PO-401, *CCP Contact-Handled Transuranic Authorized Methods for Payload Control (CCP CH-TRAMPAC) for Intersite Shipments*
- CCP-QP-002, *CCP Training and Qualification Plan*
- CCP-QP-005, *CCP TRU Nonconforming Item Reporting and Control*
- CCP-QP-008, *CCP Records Management*
- CCP-QP-010, *CCP Document Preparation, Approval and Control*

2.2 Training Requirements

- 2.2.1 All personnel performing this procedure will be trained and qualified as Acceptable Knowledge Experts (AKEs) in accordance with CCP-QP-002, prior to performing this procedure.

3.0 RESPONSIBILITIES

3.1 CCP Small Quantity Site (SQS) Manager

3.1.1 Ensures that trained AKE are available to implement this procedure in coordination with the Host site.

3.1.2 Reviews and approves the PK Summary Report.

3.1.3 Reviews the characterization data for each waste stream.

3.2 Acceptable Knowledge Experts (AKE)

3.2.1 Identifies, locates, compiles, documents, and evaluates required PK information.

3.2.2 Delineates waste streams and assigns waste stream numbers.

3.2.3 Recommends hazardous waste determinations to the CCP Small Quantity Site (SQS) Manager.

3.2.4 Prepares and revises PK reports and summaries.

3.2.5 Documents and resolves discrepancies with PK information.

3.2.6 Records meetings, telecommunications, interviews, and other communications.

3.2.7 Completes and maintains document summaries and reference lists.

3.2.8 Reviews and verifies PK information.

3.2.9 Develops waste stream descriptions.

3.2.10 Assigns summary category groups and waste matrix codes, and estimates waste material parameter (WMP) weights.

3.2.11 Prepares auditable file of PK information.

4.0 PROCEDURE

NOTE

The attached forms referenced in this section are provided as examples for the required PK information to be prepared for CCP Records. The forms identify the minimum information that will be prepared to document the PK collection and review process described in this procedure.

4.1 Process Knowledge (PK) Documentation Management

AKE

- 4.1.1 As they are collected, maintain the compiled PK source documents with reasonable care (protection from damage or loss).
-

NOTE

The PK Summary Report will identify a unique scheme to track source documents on a site-by-site basis.

- 4.1.2 Assign a unique tracking number to each PK source document using the PK Source Document Reference List (see Attachment 4, PK Source Document Reference List for an example) for each site. Examples of source document categories are as follows:

C – Correspondence

D – Documents

M – Miscellaneous

P – Procedures and Published Documents

DR – Discrepancy Resolution

U – Unpublished Documents

4.2 Compiling PK Documentation

AKE

- 4.2.1 Locate and obtain references with assistance of the Host site for documents with reference sections, as applicable.

- 4.2.2 Compile (i.e., gather) source documents that identify TRU waste management program information in the PK Documentation Checklist (see Attachment 1, PK Documentation Checklist [#s PR1-PR8] for an example) for facilities that generated the waste stream.

NOTE

Information compiled shall be sufficient to accurately characterize the waste stream.

NOTE

Source documents may include published or unpublished documents, correspondence, databases, quality assurance (QA) protocols, operating procedures, work instructions, waste storage/disposal records, waste certification summaries, process flow diagrams, analytical and testing data packages from previous waste characterization activities, and other sources of information descriptive of elements on the checklist.

- 4.2.3 Apply a unique waste stream number based information from the Host site.
- 4.2.4 Compile source documents that identify TRU waste stream-specific information specified in the Process Knowledge Documentation Checklist (PK #s WS1-WS12) for each waste stream.
- 4.2.5 Compile source documents that identify additional PK documentation specified in the Process Knowledge Documentation Checklist (PK #s S1-S16).

4.3 Recording PK Documentation

- 4.3.1 Copy the document or the pertinent information from the document that defines source document contents, including cover sheets, executive summaries, introductions, and table of contents, if available.

NOTE

Classified material **CAN NOT** be copied. If source documents are classified, an unclassified summary will need to be provided by the Host site or the document will be developed and summarized on a PK Source Document Summary form (see Attachment 3, PK Source Document Summary for an example), by the AKE **AND** reviewed by the Site's Authorized Derivative Classifier for release.

- 4.3.2 Record meetings, telecommunications, interviews, and other communication on a Record of Communication form (see Attachment 2, Record of Communication for an example), including a detailed summary of the content of the communication and data limitations or discrepancies.
- 4.3.3 As necessary, prepare a memorandum or letter to CCP Records documenting the method used by the AKE to review PK sources for the purpose of evaluating required PK parameters such as radionuclides, Waste Matrix Codes, assignment of EPA HWNs, estimating WMP weights, etc. The memorandum must identify the sources of PK used during the evaluation and clearly document the AKE assumptions and conclusions.
- 4.3.4 Complete a PK Source Document Summary for each source document, and each Record of Communication as appropriate that includes detail sufficient to justify the use of the information.
- 4.3.5 **IF** the summary consists of multiple pages, **THEN** provide the unique source document tracking number on each page, **AND** paginate the number of pages (e.g., 2 of 6 pages).
- 4.3.6 Print name, sign, date, and attach the PK Source Document Summary to each source document and each Record of Communication, before submitting to CCP Records.
- 4.3.7 For source documents that **CAN NOT** be reproduced or removed from the source (e.g., classified documents or databases), indicate that a copy of the source document is **NOT** available, and state the reason.
- 4.3.8 Include a note on the limitations of the information (e.g., if a document covers a specific period of time) on the PK Source Document Summary.

4.3.9 Create and maintain a PK Source Document Reference List that includes the following:

- Source document tracking number
- Source document title
- Name of author
- Original document number, or publisher's document number (if available)
- Revision number and document date (if applicable)
- Cross-reference to the applicable PK number(s) on the Process Knowledge Documentation Checklist for which the source document is used.

4.4 Review and Submittal of PK Documentation

4.4.1 **IF** there is no information linking the waste stream to defense related activities or commingled with defense materials, **THEN** notify the CCP SQS Manager.

NOTE

According to CCP-PO-002, *CCP Transuranic Waste Certification Plan*, a TRU waste is eligible for disposal at WIPP if it has been generated in whole or in part by one or more of the following functions:

- Naval reactors development
 - Weapons activities including defense inertial confinement fusion
 - Verification and control technology
 - Defense nuclear materials production
 - Defense nuclear waste and materials by-products management
 - Defense nuclear materials security and safeguards and security investigations
 - Defense research and development
-

4.4.2 Verify that 100 percent of the information specified in the PK Documentation Checklist from PK #s PR1 through PR8 and WS1 through WS12 has been compiled.

4.4.3 **IF** 100 percent of this information is **NOT** available for a particular waste stream ,
THEN notify the CCP SQS Manager that waste is **NOT** eligible for disposal at WIPP without the collection of additional information to augment the existing PK.

4.4.4 Review all PK information compiled in Section 4.2 of this procedure.

4.4.5 Document and resolve discrepancies regarding PK information among PK source documents as described in Section 4.5 of this procedure.

4.4.6 Print name, sign, and date the Process Knowledge Documentation Checklist once the collection and review of the required PK information has been completed.

NOTE

CCP-PO-001, *CCP Transuranic Waste Characterization Quality Assurance Project Plan*, defines a waste stream as “waste materials that have common physical form, that contain similar hazardous constituents, and that are generated from a single process or activity”. This definition will be used to obtain information for the waste stream specific description.

- 4.4.7 Using the definition of a waste stream from above, the waste stream-specific documentation from the Process Knowledge Documentation Checklist, and, if applicable, the description from DOE/TRU-06-3344, *Transuranic Waste Baseline Inventory Report* (TWBIR), define the waste stream represented by the compiled PK information, **AND** provide this description and the PK summary report (several examples exist and can be used as a format and content guide when preparing the PK summary report).
-

NOTE

Waste matrix code will be assigned based on the physical form of the waste. DOE/LLW-217, *DOE Waste Treatability Group Guidance*, describes the convention for assignment of waste matrix codes for low-level waste treatability groups, and can be used as the basis for the assignment of waste matrix codes that bound the waste stream.

- 4.4.8 Assign and describe the waste matrix code assigned to each waste stream identified.

NOTE

The Waste Matrix Code Groups identified in CCP-PO-001 are:

- Solidified inorganics
 - Solidified organics
 - Salt waste
 - Soils
 - Lead/cadmium metal
 - Inorganic nonmetal waste
 - Combustive waste
 - Graphite
 - Filters
 - Heterogeneous debris waste
 - Uncategorized metals
-

4.4.9 Assign the waste stream to the appropriate Waste Matrix Code Group.

4.4.10 Assign the waste stream to the appropriate summary category group as defined below:

- S3000 Homogeneous Solids – Homogeneous solids are defined as solid material, excluding soil, that does not meet the New Mexico Environment Department (NMED) criteria for classification as debris (20.4.1.800 NMAC [incorporating 40 CFR §268.2(g) and(h)]). Included in the series of homogeneous solids are inorganic process residues, inorganic sludges, salt waste, and pyrochemical salt waste. Other waste streams are included in this Summary Category Group based on the specific waste stream types and final waste form. This Summary Category Group is expected to contain toxic metal and spent solvents. This category includes wastes that are at least 50 percent by volume homogeneous solids.
- S4000 Soil/Gravel – This Summary Category Group includes S4000 waste streams that are at least 50 percent by volume soil/gravel. This Summary Category Group is expected to contain toxic metals.
- S5000 Debris Wastes – This Summary Category Group includes heterogeneous waste that is at least 50 percent by volume material that meets the criteria specified in 20.4.1.800 NMAC (incorporating 40 CFR §268.2[g]). Debris means solid material exceeding a 2.36 inch (60 millimeter)

particle size that is intended for disposal and that is a manufactured object, plant or animal matter, or natural geologic material. Particles smaller than 2.36 inches in size may be considered debris if the debris is a manufactured object and if it is **NOT** a particle of S3000 or S4000 material.

- 4.4.11 Review the PK information to determine if the waste is listed under 20 NMAC 4.1.200 (incorporating 40 CFR 261.30), Subpart D. If so, assign the appropriate HWNs.
- 4.4.12 Review the PK information to determine if a toxicity characteristic 20 NMAC 4.1.200 (incorporating 40 CFR 261.20), Subpart C contaminant is identified and has **NOT** been assigned a listed HWN from step 4.4.11. Assign the toxicity characteristic HWN unless data is available that demonstrate the concentration of the constituent in the waste is less than the toxicity characteristic regulatory level.
- 4.4.13 Compare the HWNs assigned from steps 4.4.12 and 4.4.13 to the HWNs listed in the WIPP Hazardous Waste Facility Permit (HWFP).
- 4.4.14 **IF** any HWNs are **NOT** included in the WIPP HWFP, **THEN** the waste stream is **NOT** acceptable for disposal at the WIPP; notify the CCP SQS Manager.
- 4.4.15 Include the justification and basis for steps 4.4.11, 4.4.12, 4.4.13, and 4.4.14 in the TRU waste stream-specific description of the PK Summary Report, **AND** complete the PK Hazardous Constituents form (see Attachment 5, PK Hazardous Constituents for an example).
- 4.4.16 Print name, sign, and date the PK Hazardous Constituents form.
- 4.4.17 Assess available PK radionuclide data.
- 4.4.18 **IF** PK is intended as the sole basis for meeting the radiological characterization requirements in CCP-PO-401, **THEN** state so in the PK Summary Report.
- 4.4.19 Prepare a Waste Material Parameter Evaluation Memorandum to CCP Records that estimates the WMP weights for the waste stream. The expected weight percent for each WMP will be calculated using historical waste generator or industry documentation for retrievably stored waste inventories. Generator

estimates and existing PK will be used to estimate the WMPs for newly-generated waste containers. This evaluation should include the technical assumptions and justification for the estimated weight percentages.

4.4.20 Complete the following attachments as appropriate: PK Waste Form, Waste Material Parameters, Prohibited Items, and Packaging (see Attachment 6, PK Waste Form, Waste Material Parameters, Prohibited Items, and Packaging for an example), PK Radionuclides (see Attachment 7, PK Radionuclides for an example), and PK Containers List (see Attachment 8, PK Containers List for an example; or an equivalent form, (e.g., spreadsheet). Include the Waste Material Parameter Evaluation Memorandum as an addendum to the PK Waste Form, Waste Material Parameters, Prohibited Items, and Packaging. Prepare the PK Container Tracking Spreadsheet for the containers identified in the PK Containers List.

4.4.21 Print name, sign, and date all attachments generated in the previous steps.

4.4.22 Review the waste management program PK documentation specified on the Process Knowledge Documentation Checklist, **AND** write a TRU Waste Management Program Description in an PK summary report that addresses PK #s PR1-PR8 in the PK Documentation Checklist. Include the following:

- Correlation to the waste stream identification and description found in the TWBIR or indication that the waste stream was not included in the TWBIR.
- Determination of whether the TRU waste materials were generated as a result of, or mixed with materials from, defense-related activities as specified in CCP-PO-002.
- Determination that the waste does not contain spent nuclear fuel or high-level waste.

4.4.23 **IF** it is determined that any container contains prohibited items or incompatible materials,
THEN perform the following:

- [A] Notify the CCP SQS Manager **AND** identify the specific containers that may contain Prohibited Items.

- 4.4.24 Correlate TRU waste management program information (PK #s PR1 - PR8), with TRU waste stream-specific information (PK #s WS1 - WS12), in regard to the time of generation, waste generation processes, rate and quantity of newly generated waste (when appropriate), and areas and building or facility where the waste stream was generated (see PK Documentation Checklist).
- 4.4.25 Identify PK source document tracking numbers, as applicable, in the TRU waste management program description and TRU waste stream-specific description.
- 4.4.26 Review the waste stream-specific PK documentation specified on the PK Documentation Checklist and information developed in steps 4.4.9 through 4.4.29, **AND** write a TRU waste stream-specific description in the PK summary report for each waste stream that includes the following:
- [A] Waste stream description and waste stream number. The waste stream number is limited to 20 alpha-numeric characters.
 - [B] Explain the selection of the waste matrix code in the TRU waste stream-specific description of the PK summary report.
 - [C] Ensure the description of the waste stream is sufficient to allow the radiography and VE Operators to determine whether the waste in individual containers is included in the waste stream and matches the assigned waste matrix code.
 - [D] Include the justification and basis for determination of WMPs weights expected in the waste stream.
 - [E] Include the justification and basis for the method by which the radionuclide PK has been compiled.
 - [F] Include the following assessment information:
 - Waste identification and categorization schemes relevant to the isotopic composition of the waste
 - Description of the isotopic composition of waste streams
 - Physical/chemical composition that could affect isotopic distributions

- Numerical adjustments (e.g., scaling factors, decay/in-growth corrections and secular equilibrium consideration) applied to derive isotopic compositions
 - Isotopic ratios for the ten (10) WAC-specified radionuclides
 - Radionuclides that comprise 95 percent of the radioactive hazard
- [G] Provide justification for the assumption that the waste stream is TRU waste, i.e., it contains more than 100 nanocuries (nCi) of alpha-emitting radionuclides with half-lives greater than 20 years per gram of waste, as specified in CCP-PO-002.
- [H] As necessary, provide justification for determining that the waste stream is **NOT** a high plutonium content material/waste as defined in CCP-PO-002. High plutonium content material/waste is defined as waste containing concentrations of plutonium in excess of 20 percent by weight for the aggregate of the material category. Incorporate any documentation, determination of compliance, as well as the compliance decision, into the CCP PK Record as described in Section 4.3.
- [I] Provide justification for determining the physical form, (i.e., solid or particulate) and estimated concentration of beryllium (metal and oxides) for each container within the waste stream as required in CCP-PO-002.
- [J] Provide justification for determining that each prohibited item is not present in the waste stream or describe the potential for prohibited items and how they will be identified and remediated. Identify process controls associated with the management of prohibited items, physical form, and hazardous waste content.
- [K] Provide justification for determining if any waste in the waste stream contains polychlorinated biphenyls (PCBs) in concentrations equal to or greater than 50 parts per million (ppm). Identify the type of waste containing PCB contamination (e.g., remediation, bulk product), **AND** provide justification for determining that the waste stream will **NOT** contain residual PCB liquids as defined in CCP-PO-002.

- [L] For waste streams assigned the EPA HWN U134 for hydrofluoric acid, provide information demonstrating neutralization of this acid, if available, as required by CCP-PO-001.
- [M] Describe measures taken to ensure the waste includes adequate blocking or bracing for heavy or sharp waste items that could pose a breaching hazard to the waste container.
- [N] Describe the packaging configuration and include the number of layers of confinement, closure methods of layers of confinement, bag filter information (manufacturer, serial number, model number, diffusivity), and payload container filter information.
- [O] Provide justification for determining that the waste stream does not contain spent nuclear fuel or high-level waste based. Include as necessary, determinations prepared by the generating site.

4.4.27 Summarize the waste stream-specific description in the PK summary report.

4.4.28 Prepare a PK summary report by combining the TRU waste management program description and each of the completed TRU waste stream-specific descriptions, as well as the information from the PK Documentation Checklist; Record of Communication; PK Source Document Summary; PK Source Document Reference List; PK Hazardous Constituents; PK Waste Form, Waste Material Parameters, Prohibited Items, and Packaging; PK Radionuclides; PK Containers List; and PK Source Document Discrepancy Resolution (see Attachment 9, Waste Characterization Data Cross-Reference for an example), if applicable.

4.4.29 Submit the attachments to CCP Records in accordance to CCP-QP-008, *CCP Records Management*. The PK summary report is submitted to Document Services to initiate the review and approval process in accordance to CCP-QP-010, *CCP Document Preparation, Approval and Control*.

NOTE

As the PK summary report is revised, it shall be submitted to CCP Document Services, and applicable attachments shall be submitted to CCP Records.

4.5 Resolving PK Discrepancies

NOTE

PK discrepancies may be identified during PK source document compilation, and review.

AKE

- 4.5.1 Document the nature of the discrepancy **AND** identify the documents involved for the particular waste stream or waste container on the PK Source Document Discrepancy Resolution form or in the appropriate section of the PK Summary Report.
- 4.5.2 Use information from interviews, telephone contacts, or other correspondence or other supporting information (such as characterization sampling and analysis) to resolve the discrepancy.
- 4.5.3 Record interviews, telephone conversations, and correspondence needed to resolve discrepancy issues on a Record of Communication form.
- 4.5.4 Print name, sign, and date Record of Communication form.
- 4.5.5 Complete a PK Source Document Summary form for each Record of Communication form, attach the two forms, **AND** submit to CCP Records.
- 4.5.6 Print name, sign, and date PK Source Document Summary form.
- 4.5.7 As applicable, verify that process inputs (hazardous constituents and WMPs) are consistent with WMPs compared to the shipping site's characterization data for each container (e.g., radiography, VE, inspection data).
- 4.5.8 Assign **OR** revise the PK identified WMPs, as necessary, and document the change and the assumptions made on the PK Source Document Discrepancy Resolution form.

- 4.5.9 Assign **OR** reassign waste matrix codes, as necessary, using guidance specified in the DOE Waste Treatability Group Guidance, **AND** document the assignment and assumptions made on the PK Source Document Discrepancy Resolution form.
- 4.5.10 Evaluate the sources of discrepancies among sources of isotopic distribution data to determine whether the sources are credible.
- 4.5.11 Identify limitations of data **AND**, if the data is **NOT** used, provide a justification on the PK Source Document Discrepancy Resolution form; otherwise, describe data limitations in the PK Summary Report.
- 4.5.12 Assign or revise the identified radionuclides present, as necessary, **AND** document the change and the assumptions made on the PK Source Document Discrepancy Resolution form.
- 4.5.13 Assign or revise state and EPA HWN, as necessary, unless an alternative assignment is chosen, and document the assignment and the assumptions and justifications made on the PK Source Document Discrepancy Resolution form.
- 4.5.14 Obtain the affected PK source documentation from CCP Records **OR** the generator site, as necessary.
- 4.5.15 Make necessary changes to PK Source Document Summary forms, as appropriate.
- 4.5.16 Complete, print name, sign, and date the PK Source Document Discrepancy Resolution form documenting final disposition of the discrepancy.
- 4.5.17 Complete, print name, sign, and date a PK Source Document Summary form for each PK Source Document Discrepancy Resolution form.
- 4.5.18 Attach the PK Source Document Summary form to the PK Source Document Discrepancy Resolution form.
- 4.5.19 **IF** the form consists of multiple pages, **THEN** add a footer identifying the page number and total number of pages.
- 4.5.20 Forward the form and supporting documentation (if requested) to the CCP SQS Manager for review and concurrence.

CCP SQS Manager

4.5.21 Review the PK Source Document Discrepancy Resolution form and additional PK documentation, as applicable, print name, sign, and date the form if the discrepancy has been resolved, **AND** forward the completed form to the AKE.

AKE

4.5.22 Confirm that the PK Source Document Discrepancy Resolution form is signed and dated by the CCP SQS Manager.

4.5.23 Submit the original discrepancy form and supporting documentation, as applicable, to CCP Records.

4.5.24 Revise the PK summary report as needed.

NOTE

Discrepancies which **CAN NOT** be resolved by CCP will result in the container being unshippable. If the discrepancy is **NOT** container-specific, containers from the subject waste stream will **NOT** be shipped to WIPP until such time as the discrepancy has been resolved.

CCP SQS Manager

4.5.25 **IF** the discrepancy **CAN NOT** be resolved,
THEN issue an NCR with the direction to have containers removed from the waste stream.

4.5.26 Record the NCR number on the Source Document Discrepancy form.

4.5.27 Once the discrepancy is resolved, applicable NCR(s) closed, and corrective action is completed, sign and date the PK Source Document Discrepancy Resolution form, **AND** forward the form to the AKE.

AKE

4.5.28 **WHEN** discrepancies are resolved, applicable NCRs are closed, **AND** corrective actions completed,
THEN review the discrepancy form, assign the appropriate WMPs, waste matrix code, radionuclides or HWNs as applicable, **OR** justify the use of alternates and confirm that it has been signed.

4.5.29 Submit the original Source Document Discrepancy form to CCP Records.

4.6 Updating PK for Additional Waste Stream Containers

NOTE

The following process is followed when the CCP SQS Manager identifies additional containers to be included in a waste stream defined in an existing PK Summary Report.

CCP SQS Manager

4.6.1 Provide the AKE with a list of containers to be assessed for inclusion in an existing waste stream.

AKE

4.6.2 Collect container-specific documentation and evaluate the following information for each container:

- Waste generation location and process
- Time period of generation
- Physical form compared to the assigned WMPs and waste matrix code
- Chemical content
- Prohibited items
- Radionuclides

4.6.3 **IF** the containers are bounded by the existing PK summary report for the waste stream, **THEN** update the PK Containers List, **AND** notify the CCP SQS Manager, **AND** submit the revised PK Container List and Waste Stream Container Evaluation Memorandum documenting the evaluation to CCP Records.

4.6.4 **IF** the containers are **NOT** bounded by the existing PK summary report, but should be included in the waste stream, **THEN** revise the PK summary report; update the PK Containers List; notify the CCP SQS Manager, **AND** submit the revised PK

Container List and Waste Stream Container Evaluation
Memorandum documenting the evaluation to CCP Records.

4.6.5 **IF** the containers are **NOT** bounded by the existing PK summary report **AND** should **NOT** be included in the waste stream, **THEN** notify the CCP SQS Manager **AND** submit the Waste Stream Container Evaluation Memorandum documenting the evaluation to CCP Records.

4.7 PK Container Tracking Spreadsheet Development

AKE or Designee

4.7.1 Develop a spreadsheet which identifies the following minimum criterion for each container listed on PK Containers List:

- Container I.D.
- Waste Stream I.D.
- Generation Date
- Vent Date
- Change Reason
- New Closure Date
- New Vent Date
- Container Type

4.7.2 Post the copy of the PK Container Tracking Spreadsheet to the file transfer protocol (ftp) site.

4.8 PK Container Tracking Spreadsheet Maintenance

AKE or Designee

4.8.1 **WHEN** notified of a change to the status of a container(s) identified by the CCP SQS Manager, CCP personnel, Host site personnel, or during the addition of containers to the waste stream inventory, **THEN** evaluate the change based on the data provided.

[A] **IF** the change is routine and **DOES NOT** adversely affect data
THEN GO TO step 4.8.2.

[B] **IF** the change is non-routine or adversely affects data,
THEN notify the CCP SQS Manager to take the appropriate actions prior to proceeding to step 4.8.2.

4.8.2 Update the PK Container Tracking Spreadsheet and post the change to the ftp site.

4.8.3 Notify the CCP SQS Manager of the change.

4.9 Waste Stream Profiling

4.9.1 Using the PK documentation developed by the implementation of this procedure, complete the waste stream profile documentation in accordance with the receiving site's waste acceptance criteria requirements.

4.9.2 Submit the waste stream profile and supporting PK documentation (i.e., PK Summary Report, PK sources, and Attachments 1 – 9), to the receiving site.

5.0 RECORDS

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

5.1.1 QA/Non-Permanent Records

- [A] Process Knowledge Documentation Checklist
- [B] Records of Communication, which include PK Source Document Summary forms as attachments
- [C] PK Source Document Summary forms, with attachments (PK source documents)
- [D] PK Source Document Reference List
- [E] PK Hazardous Constituents forms
- [F] PK Waste Form, Waste Material Parameters, Prohibited Items, and Packaging forms
 - Waste Material Parameter Evaluation Memorandum
- [G] PK Radionuclides forms
- [H] PK Containers List
 - Waste Stream Container Evaluation Memorandum
- [I] PK Source Document Discrepancy Resolution, which include PK Source Document Summary forms as attachments
- [J] PK Summary Reports
- [K] CCP SQS Manager Notifications (emails, letters, memorandums, etc.), as applicable
- [L] PK Container Tracking Spreadsheet (submitted to CCP Records after the completion of waste stream shipment)

Attachment 1 – PK Documentation Checklist - Example

Page 1 of 4

Site(s): _____

Waste Stream Description: _____

| Waste Stream Number(s): _____ | | | |
|--|--------|--------------------|------------------------------------|
| Process Knowledge Information | (1)PK# | Compiled? (Y/N) | Source Document Tracking Number |
| Mandatory generator site TRU waste management program (PR) information ^(a) : | | | |
| Map of the generator site that identifies TRU waste generation, treatment, and storage areas. | PR1 | | |
| Generator site mission descriptions related to TRU waste generation and management identifying defense and non-defense operations. | PR2 | | |
| Overview of the generator site and generator site TRU waste management operations in the context of the facility's mission. | PR3 | | |
| Descriptions of historical and current TRU waste generating operations, including how waste is tracked and managed and/or how operations relative to isotopic composition were tracked. | PR4 | | |
| Waste identification and/or categorization schemes and terminology used at the generator site, including codes correlating to specific isotopic distributions. | PR5 | | |
| Types and quantities of TRU waste generated, including historical generation through future projections. | PR6 | | |
| Correlation of waste streams and description of time of generation, waste generating processes, and area and building/facility where each waste stream was generated. | PR7 | | |
| Certification procedures for waste to be sent to the WIPP facility (i.e., procedures to ensure that prohibited items are documented and managed in accordance with site-specific certification plans). | PR8 | | |
| Mandatory generator site TRU waste stream (WS)-specific information ^(a) : | | | |
| Waste stream designation | WS1 | | |
| Area(s) and building(s) from which the waste stream was or is generated. | WS2 | | |
| Waste stream volume and time period of generation | WS3 | | |
| Waste generating process (describe for each building) including processes associated with U134 waste generation, if applicable. | WS4 | | |

Attachment 1 – PK Documentation Checklist - Example (Continued)

| Waste Stream Number(s): _____ | | | |
|--|--------|--------------------|------------------------------------|
| Process Knowledge Information | (1)PK# | Compiled? (Y/N) | Source Document Tracking Number |
| Process flow diagrams. For research/development, analytical laboratory waste, or other similar processes where process flow diagrams cannot be created, a description of the waste generating processes, rather than a formal process flow diagram, may be included, if justified. | WS5 | | |
| Summary of basis and rationale for delineating each waste stream that is traceable to referenced documents. | WS6 | | |
| Generator site mission descriptions related to TRU waste generation and management identifying defense and non-defense operations. | WS7 | | |
| Material inputs or other information that identified the chemical contents of the waste and the stream. Includes events or processes that may have modified the chemical properties of the waste stream after generation. | WS8 | | |
| Physical waste form (e.g., glovebox materials and chemicals handled during glovebox operations, if applicable), assigned summary category group, waste matrix code and materials inputs, including waste material parameters present in the waste stream. Includes events or processes that may have modified the physical properties of the waste stream after generation. | WS9 | | |
| Waste identifiers assigned by the generator site (e.g., item description code, packaging identification numbers). | WS10 | | |
| Radionuclides present in the waste stream, if available particularly the isotopic distribution of the 10 WIPP-tracked radionuclides and/or the radionuclides that comprise 95% of the radiological hazard of the waste stream, if applicable. Chemical and physical information that could affect the waste isotopic distribution, as well as calculations used to derive the isotopic distribution. | WS11 | | |
| State and EPA hazardous waste constituents in the waste stream and state and EPA Hazardous Waste Numbers assigned, including documentation regarding how the site has historically managed the waste, including the historical regulatory status of the waste (i.e., TRU mixed versus TRU non-mixed waste). | WS12 | | |

Attachment 1 – PK Documentation Checklist - Example (Continued)

| Waste Stream Number(s): _____ | | | |
|---|--------|--------------------|------------------------------------|
| Process Knowledge Information | (1)PK# | Compiled? (Y/N) | Source Document Tracking Number |
| Additional process knowledge documentation (briefly describe) ^b : | | | |
| Process design documents (e.g., Title II Design) | S1 | | |
| Standard operating procedures that may include a list of raw materials or reagents, a description of the process or experiment generating the waste, and a description of the waste generated and how the wastes are managed at the point of generation | S2 | | |
| Preliminary and Final Safety Analysis Reports and technical safety requirements | S3 | | |
| Waste Packaging records | S4 | | |
| Test plans or research project reports that describe the reagents, radionuclides, and other raw materials used in experiments | S5 | | |
| Site databases (e.g., chemical inventory database for SARA Title III requirements, SNM or nuclear material databases) | S6 | | |
| Information from site personnel (e.g., documented interviews) | S7 | | |
| Standard industry documents (e.g., industry specification sheets, handbooks, reference materials, or other vendor information) | S8 | | |
| Analytical data relevant to the waste stream, including results from fingerprint analyses, spot checks, or routine verification sampling. This may include new information (or previously collected data) which augments required information (e.g., visual examination not performed in compliance with CCP-PO-001). | S9 | | |
| Material Safety Data Sheets, product labels, or other product information | S10 | | |
| Laboratory notebooks that detail the research processes and raw materials used in an experiment | S11 | | |
| Comparable or surrogate sampling and analysis data | S12 | | |
| Other (describe) | S13 | | |
| Safeguards and security, Materials Control and Accountability, and other nuclear material control system data Reports of nuclear safety or criticality accidents involving special nuclear materials (SNM) | S14 | | |

Attachment 1 – PK Documentation Checklist - Example (Continued)

| | | | | |
|---|--------|--------------------|------------------------------------|--|
| Waste Stream Number(s): _____ | | | | |
| Process Knowledge Information | (1)PK# | Compiled? (Y/N) | Source Document Tracking Number | |
| NMMA logs or inventory records or waste disposal logs providing SNM or nuclear material information | S15 | | | |
| Packaging | S16 | | | |

| | | | | |
|---|--|--|--|--|
| Process knowledge information regarding waste generated off-site or from similar process: | | | | |
| | | | | |
| | | | | |
| <p>(1) PK#s are used as identifiers for program, waste stream-specific and supporting elements. The identifiers are to be used in the PK Source Document Summary and PK Source Document Reference List to aid in the page location of program and waste stream-specific elements within a given document. N/A means that item is not applicable.</p> <p>a. Specified in CCP-PO-001.</p> <p>b. NOT required by CCP-PO-001 unless waste stream specific information is NOT available.</p> | | | | |

Additional comments:

All required PK information has been compiled and source document tracking numbers assigned.

Acceptable Knowledge Expert: _____ / _____ Date: _____
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Attachment 2 – Record of Communication – Example

Page 1 of 1

| | | | |
|-------------------------------|-----------------------------------|--|---------|
| Waste Stream Number(s): _____ | | Corresponding Source Document Tracking No: | |
| Interviewer: | Date: | Time: | |
| Interviewee: | Group/Organization: Job Title: | Phone: | E-mail: |
| Subject: | | | |
| Summary: | | | |
| Data Limitations: | | | |

Acceptable Knowledge Expert: _____ / _____ Date: _____
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Attachment 3 – PK Source Document Summary – Example

Page 1 of 1

| | | |
|---|---------------------------------------|--|
| Shipper Site ID: _____ | | |
| Site(s): | Source Document Tracking Number: | |
| Documentation Type: <input type="checkbox"/> TRU Waste Management Program Information <input type="checkbox"/> Waste Stream-Specific Information <input type="checkbox"/> Supporting Information | | Category: <input type="checkbox"/> C - Correspondence <input type="checkbox"/> D - Documents <input type="checkbox"/> M - Miscellaneous <input type="checkbox"/> P - Procedure <input type="checkbox"/> DR - Discrepancy Resolution <input type="checkbox"/> U - Unpublished Documents |
| Title of Source Document: | | |
| Source Document Reference Information (author(s), document and revision number, date, publisher): | | |
| PK # ^a | Source Doc. Page # ^b | PK Information Summary |
| | | |
| Source Document Data Limitations (if any): | | |
| Acceptable Knowledge Expert: | | |
| _____ / _____ | | Date: _____ |
| Print | Sign | |
| ^a Obtain from Process Knowledge Documentation Checklist ^b For microfilm or microfiche, identify box, tape, reel number and location. | | |

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Attachment 4 – PK Source Document Reference List – Example

Page 1 of 1

Site(s): _____

Waste Stream Number(s): _____

Waste Stream Description: _____

| Source Document Tracking Number ^{a/c} | Title | Author | Document # ^b | Document Revision # and Date | PK # (from Att 1) |
|--|-------|--------|-------------------------|------------------------------|-------------------|
| | | | | | |
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^a From Source Document Summaries (Attachments 3)

^b Or publisher's document number if available

^c In the case where an PK Summary Report has been revised based on information in Attachment 11 - Source Document Discrepancy Resolution form, identify the tracking number.

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Attachment 5 – PK Hazardous Constituents – Example

Site(s): _____

Waste Stream Description: _____

| Waste Stream Number: | | | | | | | | | | |
|--|--------------------------|-------------------------------|--|-------------------------------------|--|--|--|---|---|---|
| Compound | Suspected Present? (Y/N) | Suspected Concentration (ppm) | Used as a solvent? ^a (Y/N/NA) | Associated with packaging? (Y/N/NA) | TC constituent concentration less than regulatory level? ^a (Y/N/NA) | TC Hazardous Waste Number ^a | F-Listed Hazardous Waste Number ^a | U- or P- Listed Hazardous Waste Number ^a | EPA Hazardous Waste Number Assigned (N/Specify HWN) | State Hazardous Waste Number ^b |
| Metal Compounds (CCP-PO-001 - Table C3-8 & 40 CFR Part 261) ¹ | | | | | | | | | | |
| Arsenic | | | N/A | N/A | | D004 | N/A | N/A | | |
| Barium | | | N/A | N/A | | D005 | N/A | N/A | | |
| Beryllium | | | N/A | N/A | N/A | N/A | N/A | P015 | | |
| Cadmium | | | N/A | N/A | | D006 | N/A | N/A | | |
| Chromium | | | N/A | N/A | | D007 | N/A | N/A | | |
| Lead | | | N/A | N/A | | D008 | N/A | N/A | | |
| Mercury | | | N/A | N/A | | D009 | N/A | U151 | | |
| Selenium | | | N/A | N/A | | D010 | N/A | N/A | | |
| Silver | | | N/A | N/A | | D011 | N/A | N/A | | |
| Volatile Organic Compounds (CCP-PO-001 - Tables C3-2 and C3-4 & 40 CFR Part 261) | | | | | | | | | | |
| 1,1,1-Trichloroethane | | | | | N/A | N/A | F001/F002 | U226 | | |
| 1,1,2,2-Tetrachloroethane | | | | | N/A | N/A | N/A | U209 | | |
| 1,1,2-Trichloro-1,2,2-trifluoroethane | | | | | N/A | N/A | F001/F002 | N/A | | |
| 1,1,2-Trichloroethane | | | | | N/A | N/A | F002 | U227 ^k | | |
| 1,1-Dichloroethane | | | | | N/A | N/A | N/A | U076 ^k | | |
| 1,1-Dichloroethylene | | | | | | D029 | N/A | U078 | | |
| 1,2-Dichlorobenzene ^d | | | | | N/A | N/A | F002 | U070 | | |
| 1,2-Dichloroethane | | | | | | D028 | N/A | U077 ^k | | |
| 1,4-Dichlorobenzene ^d | | | | | | D027 | N/A | U072 | | |
| 2-Ethoxyethanol | | | | | N/A | N/A | F005 | U359 ^k | | |
| 2-Nitropropane | | | | | N/A | N/A | F005 | U171 ^k | | |
| Acetone | | | | | N/A | N/A | F003 | U002 | | |
| Benzene | | | | | | D018 | F005 | U019 | | |

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Attachment 5 – PK Hazardous Constituents – Example (Continued)

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| Waste Stream Number: | | | | | | | | | | |
|--|--------------------------|-------------------------------|--|-------------------------------------|--|--|--|---|---|---|
| Compound | Suspected Present? (Y/N) | Suspected Concentration (ppm) | Used as a solvent? ^a (Y/N/NA) | Associated with packaging? (Y/N/NA) | TC constituent concentration less than regulatory level? ^a (Y/N/NA) | TC Hazardous Waste Number ^a | F-Listed Hazardous Waste Number ^a | U- or P- Listed Hazardous Waste Number ^a | EPA Hazardous Waste Number Assigned (N/Specify HWN) | State Hazardous Waste Number ^b |
| Volatile Organic Compounds (continued) | | | | | | | | | | |
| Bromoform | | | | | N/A | N/A | N/A | U225 ^k | | |
| Butanol (n-Butyl alcohol) | | | | | N/A | N/A | F003 | U031 ^k | | |
| Carbon disulfide | | | | | N/A | N/A | F005 | P022 ^k | | |
| Carbon tetrachloride | | | | | | D019 | F001 | U211 ^k | | |
| Chlorobenzene | | | | | | D021 | F002 | U037 | | |
| Chloroform | | | | | | D022 | N/A | U044 | | |
| Cyclohexanone | | | | | N/A | N/A | F003 | U057 ^k | | |
| Ethyl acetate | | | | | N/A | N/A | F003 | U112 ^k | | |
| Ethyl benzene | | | | | N/A | N/A | F003 | N/A | | |
| Ethyl ether | | | | | N/A | N/A | F003 | U117 ^k | | |
| Formaldehyde ^g | | | | | N/A | N/A | N/A | U122 | | |
| Hydrazine ^h | | | | | N/A | N/A | N/A | U133 | | |
| Isobutanol | | | | | N/A | N/A | F005 | U140 ^k | | |
| Methanol | | | | | N/A | N/A | F003 | U154 | | |
| Methyl ethyl ketone | | | | | | D035 | F005 | U159 | | |
| Methyl isobutyl ketone | | | | | N/A | N/A | F003 | U161 ^k | | |
| Methylene chloride | | | | | N/A | N/A | F001/F002 | U080 ^k | | |
| Pyridine ^d | | | | | | D038 | F005 | U196 | | |
| Tetrachloroethylene | | | | | | D039 | F001/F002 | U210 | | |
| Toluene | | | | | N/A | N/A | F005 | U220 | | |
| trans-1,2-Dichloroethylene | | | | | N/A | N/A | N/A | U079 | | |
| Trichloroethylene | | | | | | D040 | F001/F002 | U228 | | |
| Trichlorofluoromethane | | | | | N/A | N/A | F001/F002 | U121 ^k | | |
| Vinyl Chloride | | | | | | D043 | N/A | U043 | | |
| Xylenes | | | | | N/A | N/A | F003 | U239 | | |

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Attachment 5 – PK Hazardous Constituents – Example (Continued)

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| Waste Stream Number: | | | | | | | | | | |
|--|--------------------------|-------------------------------|--|-------------------------------------|--|--|--|---|---|---|
| Compound | Suspected Present? (Y/N) | Suspected Concentration (ppm) | Used as a solvent? ^a (Y/N/NA) | Associated with packaging? (Y/N/NA) | TC constituent concentration less than regulatory level? ^a (Y/N/NA) | TC Hazardous Waste Number ^a | F-Listed Hazardous Waste Number ^a | U- or P- Listed Hazardous Waste Number ^a | EPA Hazardous Waste Number Assigned (N/Specify HWN) | State Hazardous Waste Number ^b |
| Semivolatile Organic Compounds (CCP-PO-001 - Table C3-6 & 40 CFR Part 261) | | | | | | | | | | |
| 2,4,5-Trichlorophenol | | | | | | D041 ^k | F027 ^k | N/A | | |
| 2,4,6-Trichlorophenol | | | | | | D042 ^k | F027 ^k | N/A | | |
| 2,4-Dinitrophenol | | | | | N/A | N/A | N/A | P048 ^k | | |
| 2,4-Dinitrotoluene | | | | | | D030 | N/A | U105 | | |
| Cresols | | | | | | D026 | F004 | U052 | | |
| Cresols (m) | | | | | | D024 ^k | N/A | N/A | | |
| Cresols (o) | | | | | | D023 ^k | N/A | N/A | | |
| Cresols (p) | | | | | | D025 ^k | N/A | N/A | | |
| Hexachlorobenzene | | | | | | D032 | N/A | U127 ^k | | |
| Hexachlorobutadiene | | | | | | D033 | N/A | U128 ^k | | |
| Hexachloroethane | | | | | | D034 | N/A | U131 ^k | | |
| Nitrobenzene | | | | | | D036 | F004 | U169 ^k | | |
| Pentachlorophenol | | | | | | D037 | F027 ^k | N/A | | |
| Pesticides and Herbicides (40 CFR Part 261) | | | | | | | | | | |
| 2,4,5-TP (Silvex) | | | | | | D017 ^k | F027 ^k | N/A | | |
| 2,4-D | | | | | | D016 ^k | N/A | U240 ^k | | |
| Chlordane | | | | | | D020 ^k | N/A | U036 ^k | | |
| Endrin | | | | | | D012 ^k | N/A | P051 ^k | | |
| Heptachlor (and its epoxide) | | | | | | D031 ^k | N/A | P059 ^k | | |
| Lindane | | | | | | D013 ^k | N/A | U129 ^k | | |
| Methoxychlor | | | | | | D014 ^k | N/A | U247 ^k | | |
| Toxaphene | | | | | | D015 ^k | N/A | P123 ^k | | |

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Attachment 5 – PK Hazardous Constituents – Example (Continued)

Page 5 of 5

- a. Source: Title 40 Code of Federal Regulations Part 261, Identification and Listing of Hazardous Waste
- b. Source: Cite applicable state regulation
- c. Superscript not used.
- d. Can also be analyzed as a semivolatile organic compound
- e. Add rows or attach additional sheets as necessary
- f. Flammable VOCs included in the CH-TRAMPAC
- g. Required only for homogeneous solids and soil/gravel from LANL and SRS
- h. Required only for homogeneous solids and soil/gravel from ORNL and SRS
- i. Antimony, nickel, thallium, vanadium, and zinc are included in Table C3-8 of CCP-PO-001 but are not regulated under 40 CFR Part 261, and therefore, are not subject to AK evaluation per CCP-PO-001.
- j. Source: Title 40 Code of Federal Regulations Part 761, Polychlorinated Biphenyls (PCBs) Manufacturing, Processing, Distribution in Commerce, and Use Prohibitions.
- k. This EPA Hazardous Waste Number is not permitted for WIPP disposal.

NOTE: If any of the information requested on this form is not available or not applicable, enter N/A in the appropriate box.

Acceptable Knowledge Expert: _____ / _____ Date: _____
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Attachment 6 – PK Waste Form, Waste Material Parameters, Prohibited Items, and Packaging – Example

Page 1 of 2

Site(s): _____

Waste Stream Description: _____

Container ID Numbers: _____

| Waste Stream Number: | |
|--|--|
| Requirement | Result |
| Physical Waste Form (e.g., debris, solidified waste) | |
| Summary Category Group ^a | |
| Waste Matrix Code Group ^a | |
| Waste Matrix Code ^b | |
| Waste Material Parameter Weights ^c | Estimated Waste Stream Weight Percent Average (attach evaluation justifying percentages) |
| Iron-based metals/alloys | |
| Aluminum-based metals/alloys | |
| Other metals | |
| Other inorganic materials | |
| Cellulosics | |
| Rubber | |
| Plastics (waste materials) | |
| Organic matrix | |
| Inorganic matrix | |
| Soils/Gravels | |
| Packaging materials | Present (Y/N)? |
| Steel | |
| Plastics | |
| Prohibited Wastes ^{d, e, f, g} | Present (Y/N)? |
| Liquid waste > 1 inch or 2.5 cm in the bottom of internal container or >1 percent of volume of the waste container | |
| Non-radionuclide pyrophoric materials | |
| Sealed containers > 4 liters | |
| Hazardous waste not occurring as co-contaminants with TRU mixed waste (non-mixed hazardous waste) | |

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Attachment 7 – PK Radionuclides – Example

Page 1 of 1

(This attachment may be provided in a different format)

Site(s): _____

Waste Stream Number(s): _____

Waste Stream Description: _____

| Radionuclide | Wt % ^b | Cl ^b | Suspected Present (Yes/No) |
|--|-------------------|-----------------|-------------------------------|
| From CCP-PO-002 | | | |
| Sr-90 | | | |
| Cs-137 | | | |
| U-233 | | | |
| U-234 | | | |
| U-238 | | | |
| Pu-238 | | | |
| Pu-239 | | | |
| Pu-240 | | | |
| Pu-242 | | | |
| Am-241 | | | |
| Other Radionuclides (List) | | | |
| ^a Source: <i>Transuranic Waste Acceptance Criteria for the Waste Isolation Pilot Plant (WAC)</i> (DOE/WIPP-02-3122), Section 3 ^b If available | | | |

Acceptable Knowledge Expert: _____ / _____ Date: _____
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Attachment 9 – PK Source Document Discrepancy Resolution – Example

Page 1 of 1

Waste Stream Number(s): _____

Waste Stream Description: _____

| PK Documentation Type: <input type="checkbox"/> TRU Waste Management Program Information <input type="checkbox"/> Waste Stream Specific Information <input type="checkbox"/> Additional Information | | | | | | | |
|---|-----------------------|-------|---------------|--------|-------------|-----------|--------|
| PK Source Document Discrepancy Form Tracking Number: | | | | | | | |
| Tracking # | Category ^a | Title | Document/Rev# | Author | Date | Publisher | Page # |
| | | | | | | | |
| | | | | | | | |
| | | | | | | | |
| Nature of Discrepancy: | | | | | | | |
| Resolution: | | | | | | | |
| Discrepancy Resolved: <input type="checkbox"/> Yes <input type="checkbox"/> No | | | | | | | |
| Acceptable Knowledge Expert: | | / | | | Date: _____ | | |
| Print | | Sign | | | | | |
| CCP SQS Manager: | | / | | | Date: _____ | | |
| Print | | Sign | | | | | |

^a Published Document or Controlled Database (Pub.); Unpublished Data (Unpub.); Internal Procedure or Note (Proc.); Correspondence (Corr.) or Discrepancy (Disc.)