

CCP-TP-405

Revision 4

CCP Intersite Shipments of Contact-Handled Transuranic Waste

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APPROVED FOR USE

RECORD OF REVISION

Revision Number	Date Approved	Description of Revision
0	10/22/2008	Initial Issue.
1	02/17/2009	Changed to align the procedure with the Intersite Shipping Module (ISM) system modifications and implemented editorial changes.
2	04/17/2009	Inserted a note in Section 4.1, step 4.1.2, to add default values to obtain preliminary reports.
3	12/18/2009	Revised to incorporate Waste Data System (WDS) operations. Editorial changes were also made.
4	03/30/2010	Revised to align procedure with modifications made to the Waste Data System (WDS) system, and editorial corrections.

TABLE OF CONTENTS

1.0 PURPOSE..... 4
1.1 Scope..... 4

2.0 REQUIREMENTS..... 4
2.1 References 4
2.2 Training Requirements..... 6
2.3 Equipment List..... 7
2.4 Precautions and Limitations..... 7
2.5 Prerequisite Actions..... 8
2.6 Definitions 8

3.0 RESPONSIBILITIES..... 9
3.1 Transportation Certification Official (TCO)..... 9
3.2 Host Site Radiological Control Technician (RCT) or Equivalent Position... 9
3.3 CCP CH Packaging and Transportation Team 10
3.4 CCP Waste Certification Official (WCO) 10
3.5 Host Site Shipping Coordinator..... 10
3.6 Host Site Transportation 10
3.7 State Motor Vehicle Department..... 10

4.0 PROCEDURE..... 11
4.1 WDS Data Entry/CH Shipment Certification 11
4.2 Shipment Approval 14
4.3 Finalizing Shipments Using the WDS: 15
4.4 Shipping Preparations..... 16
4.5 Inspections and Loading Operations 17
4.6 Controlled Shipment Processing..... 20
4.7 Shipping Completion..... 20
4.8 Shipment Receipt 22

5.0 RECORDS..... 23

LIST OF ATTACHMENTS

Attachment 1 – CCP Dunnage Certification Statement..... 24
Attachment 2 – CCP Container Integrity Checklist..... 25
Attachment 3 – Payload Accessories 29
Attachment 4 – CCP Shipping Site Control Checklist for Controlled Shipments 30
Attachment 5 – CCP Receiving Site Control Checklist for Receipt of Controlled Shipments 31

1.0 PURPOSE

This procedure establishes requirements for assembling transuranic (TRU) waste payloads and performance of shipments in contact-handled (CH) packaging containers and ensures that the requirements of CCP-PO-401, *CCP Intersite Contact-Handled Transuranic Authorized Methods for Payload Control (CCP CH-TRAMPAC) for Intersite Shipments*, or a U.S. Department of Energy (DOE) Carlsbad Field Office (CBFO) audited/approved site-specific CH Transuranic Waste Authorized Methods Payload Control (CH-TRAMPAC) are met.

1.1 Scope

This procedure applies to the personnel who conduct the following transportation functions:

- CH packaging payload container and assembly verification.
- Assembling and loading the CH packaging containers.
- Reviewing the shipping paper, marking, labeling, and placarding associated with each shipment of CH TRU waste transported in CH packaging containers by the Central Characterization Project (CCP).
- Radiological Control Technician (RCT) or equivalent position functions associated with CH packaging and transportation operations.

2.0 REQUIREMENTS

2.1 References

Baseline Documents

- Appendix to 40 Code of Federal Regulations (CFR), *Protection of Environment, Part 262, Standards Applicable to Generators of Hazardous Waste, Uniform Hazardous Waste Manifest and Instructions* (U.S. Environmental Protection Agency [EPA] Forms 8700-22 and 8700-22A and their instructions)
- DOE/WIPP-01-3194, *CH TRU Waste Content Codes*
- DOE/WIPP-02-3183, *CH Packaging Program Guidance*
- DOE/WIPP-02-3185, *CH Packaging Maintenance Manual*

- 40 CFR Part 262, *Standards Applicable to Generators of Hazardous Waste*
- 40 CFR Part 262, Subpart B, *The Manifest § 262.20, General Requirements*
- 40 CFR Part 761, *Polychlorinated Biphenyls (PCBs) Manufacturing, Processing, Distribution in Commerce, and use prohibitions: Marking of PCB's and PCB Items § 761.40*
- 49 CFR, Transportation, Part 172, *Hazardous Materials Table, Special Provisions, Hazardous Materials Communications, Emergency Response Information, and Training Requirements § 172.200, Applicability*
- 49 CFR Part 172 § 172.704, *Training Requirements*
- 49 CFR Part 173, *Shippers—General Requirements for Shipments and Packagings, Subpart I, Class 7 Radioactive Materials § 173.401 through 173.476*
- *Safety Analysis Report for the TRUPACT-II Shipping Package (SARP) (Docket 9218, Washington, D.C., U.S. Nuclear Regulatory Commission [NRC])*
- *Safety Analysis Report for the HalfPACT Shipping Package (SARP) (Docket 9279, Washington, D.C., U.S. NRC)*

Referenced Documents

- CCP-PO-401, *CCP Intersite Contact-Handled Transuranic Authorized Methods for Payload Control (CCP CH-TRAMPAC) for Intersite Shipments*
- CCP-QP-002, *CCP Training and Qualification Plan*
- CCP-QP-008, *CCP Records Management*
- *CH TRU Payload Appendices*
- DOE/WIPP-02-3184, *CH Packaging Operations Manual*
- DOE/WIPP-02-3220, *CH Packaging Operations for High-Wattage Waste*

- 10 CFR Part 21, *Reporting of Defects and Nonconformance*
- 10 CFR Part 71, *Packaging and Transportation of Radioactive Materials*
- 40 CFR Part 262, *Standards Applicable to Generators of Hazardous Waste, Subpart B, The Manifest*
- 40 CFR Part 262, Subpart C, *Pre-Transport Requirements*
- 40 CFR Part 262, Subpart C § 262.31, *Labeling*
- 40 CFR Part 262, Subpart C § 262.32, *Marking*
- 40 CFR Part 262, Subpart C § 262.33, *Placarding*
- 40 CFR Part 268, *Land Disposal Restrictions, Subpart A, General*
- 40 CFR Part 761, Subpart C § 761.40, *Marking of PCBs and PCB Items*
- 49 CFR Part 172, Subpart C, *Shipping Papers* § 172.201 through 172.205
- 49 CFR Part 172, Subpart D, *Marking* § 172.300 through 172.338
- 49 CFR Part 172, Subpart E, *Labeling* § 172.400 through 172.450
- 49 CFR Part 172, Subpart F, *Placarding* § 172.500 through 172.560
- Transportation Tracking and Communications (TRANSCOM) 2000 Designated User Handbook
- DOE/WIPP-09-3427, *Waste Data System User's Manual*

2.2 Training Requirements

- 2.2.1 Personnel performing this procedure will be trained and qualified in accordance with CCP-QP-002, *CCP Training and Qualification Plan*, prior to performing this procedure.
- 2.2.2 CCP Transportation Certification Officials (TCO) completing the Payload Container Transportation Certification Documents (PCTCDs), Overpack Payload Container Transportation Certification Documents (OPCTCDs), and Payload Assembly

Transportation Certification Documents (PATCDs) as required by this procedure, are qualified in accordance with CCP-QP-002, prior to performing this procedure.

2.3 Equipment List

2.3.1 None

2.4 Precautions and Limitations

2.4.1 Nonconformances related to defects or failure to comply with requirements applicable to NRC-licensed packaging (e.g., TRUPACT-II, HalfPACT) shall be reported to the CBFO Office of National TRU Program (NTP). The Waste Isolation Pilot Plant (WIPP) Management and Operating (M&O) Contractor will evaluate issues and nonconformances for reporting to the NRC under 10 CFR Part 21, *Reporting of Defects and Noncompliance*, or Part 71, *Packaging and Transportation of Radioactive Materials*, and provide the results of this evaluation to CBFO.

2.4.2 Filter vents, as specified in Section 2.5 of CCP-PO-401, must be installed in payload containers.

2.4.3 Dunnage Containers

[A] Dunnage containers used for payload assembly shall have open vent ports (not filtered or plugged).

[B] Dunnage containers used for payload assembly shall be labeled either Dunnage or Empty.

[C] Dunnage shall have a unique serial number. If dunnage constitutes any of the following: seven packs, four packs, three packs or standard waste boxes (SWBs), then the unique serial number is **NOT** required.

[D] Dunnage containers shall meet the requirements of Section 2.2 of CCP-PO-401.

2.4.4 Radiation Dose Rates and Removable Surface Contamination

[A] The external radiation dose rates of individual payload containers to be shipped, shall be less than or equal to 200 millirem/hour (mrem/hr) at the surface for beta/gamma and neutron.

- [B] The external radiation dose rates of individual CH packages to be shipped, shall be less than or equal to 200 mrem/hr at the surface, and less than or equal to 10 mrem/hr at two meters for beta/gamma and neutron.
- [C] Removable surface contamination of individual payload containers and a loaded CH package to be shipped shall **NOT** be greater than 20 disintegrations per minute (dpm)/100 centimeters square (cm²) for alpha emitting radionuclides and 200 dpm/100 cm² for beta/gamma emitting radionuclides.

2.5 Prerequisite Actions

- 2.5.1 Ensure that workers who will be working in a radiation area have read the applicable Radiation Work Permit (RWP) or equivalent site-specific document.

2.6 Definitions

- 2.6.1 **Generator** – The organization/individual that generated the waste and/or is offering the waste for transport.
- 2.6.2 **Land Disposal Restrictions (LDR) Notification** – Notification to a receiving facility that the waste is subject to LDR (from 40 CFR, *Protection of Environment, Part 268, Land Disposal Restrictions, Subpart A, General*).
- 2.6.3 **Shipper** – Authorized personnel who declare, by signing the shipping paper, that the contents of the package are fully and accurately described, packaged, labeled/placarded and proper for conditions of transport per appropriate regulations.
- 2.6.4 **Shipping Paper** – Uniform Hazardous Waste Manifest (UHWM) or Straight Bill of Lading-Short Form. The shipping paper accompanies the waste during transportation.
- 2.6.5 **Straight Bill of Lading-Short Form** – Shipping paper used to transport non-mixed radioactive TRU waste.
- 2.6.6 **Uniform Hazardous Waste Manifest (UHWM)** – The U.S. Environmental Protection Agency (EPA) Form 8700-22 prepared by a generator who transports or offers for transportation hazardous waste for off-site treatment, storage, or disposal (from 40 CFR Part 262, *Standards Applicable to Generators of Hazardous Waste, Subpart B, The Manifest*).

3.0 RESPONSIBILITIES

3.1 Transportation Certification Official (TCO)

- 3.1.1 Interfaces and coordinates with the generator, shipper, Waste Certification Official (WCO), CCP Quality Assurance (QA), and CCP Operations leaders to plan payloads for shipment.
- 3.1.2 Documents and certifies that containers prepared for shipments in CH packaging meet specified shipping criteria using the PCTCD, PATCD, OPCTCD, and the Waste Data System (WDS), as appropriate.
- 3.1.3 Reviews payload certification documentation to ensure compliance with CCP-PO-401 requirements or a CBFO-audited/approved site-specific CH-TRAMPAC.
- 3.1.4 Provides the necessary TRU waste shipping data to the Host site Shipping Coordinator.
- 3.1.5 Ensures all manifests and shipping papers are correct, as required.
- 3.1.6 Ensures all labeling, marking, and placarding is correct, as required.
- 3.1.7 Requests and obtains approval/authority from Transportation Tracking and Communication System (TRANSCOM) for shipment release.
- 3.1.8 Completes site-specific LDR (if applicable).

3.2 Host Site Radiological Control Technician (RCT) or Equivalent Position

- 3.2.1 Provides contamination and radiation surveys to the TCO for shipment certification purposes.

- 3.3 CCP CH Packaging and Transportation Team
 - 3.3.1 Ensures the payload assembly and CH Packaging Containers are prepared in accordance with this procedure.
 - 3.3.2 Ensures visible container ID labels, within a payload assembly, are an exact match to the ID numbers listed on the applicable PATCD.
- 3.4 CCP Waste Certification Official (WCO)
 - 3.4.1 Interfaces with TCO to gather required information for receiving site documentation.
 - 3.4.2 Prepares forms required by receiving site.
 - 3.4.3 Interfaces with receiving site for approval of drums selected for shipment.
- 3.5 Host Site Shipping Coordinator
 - 3.5.1 Interfaces with TCO and acts as the site point-of-contact (POC) for operations, manifesting, and release of shipments.
 - 3.5.2 Assists TCO in scheduling and facilitating TRU waste shipments.
 - 3.5.3 Provides data received from TCO, to the Host site transportation and material control/accountability groups (as applicable).
- 3.6 Host Site Transportation
 - 3.6.1 Performs marking, labeling, and placarding of CH Packages and Trailer (if applicable).
 - 3.6.2 Interfaces with State Motor Vehicle Department (SMVD) and arranges Commercial Vehicle Safety Alliance (CVSA) inspections.
- 3.7 State Motor Vehicle Department
 - 3.7.1 Performs CVSA Inspections of the tractor, trailer, and CH Packages.

4.0 PROCEDURE

NOTE

The WDS utilizes edit and limit checks when data is entered and selected. The WDS steps in Section 4.1 may be repeated until payloads and shipping compliance is satisfied.

NOTE

Steps in this procedure may be performed in parallel as applicable..

NOTE

Steps in this procedure are performed by the TCO, unless another group/discipline is mentioned in the step or a note preceding the step.

NOTE

Trained and qualified TCO's perform the WDS operation per the guidance found in DOE/WIPP-09-3427, Waste Data System User's Manual. The WDS manual is NOT required to be opened when performing the task listed below, but shall be available for reference if questions arise.

NOTE

Contact Information of organizations called out in this procedure are listed as follows. Specific email addresses can be obtained by contacting the numbers below:

WIPP Shipment Scheduler 575-234-8993 or 575-234-8230
WIPP Transportation group 575-234-8993 or 575-234-8230
WIPP RCT group 575-234-8657
WIPP Central Monitoring Room (CMR) 575-234-8863 or 575-234-8640

FAX notifications can be made in lieu of emails if needed. FAX numbers can be obtained by contacting the specific group.

4.1 WDS Data Entry/CH Shipment Certification

NOTE

Step 4.1.1 is only performed if dunnage is required for the payload.

4.1.1 Creating Dunnage Container/s using WDS

[A] Enter the following information into the WDS for each dunnage container.

- Unique container number
- Current Location (Site ID)
- Shipping Program (Site ID)
- Container Type

4.1.2 Creating Payloads Using the WDS

[A] Select the new button to create/generate a Payload Plan ID.

[B] For each payload enter the following information into the WDS:

- Payload Number
- Payload Container Type
- Current Location (Site ID)
- Destination Site (Site ID)
- Shipping Program (Site ID)

[C] Select drums until a CCP-PO-401 compliant payload is obtained.

[D] Once the virtual CCP-PO-401 compliant payload is built, then select the accept button.

[E] Select the submit button.

[F] Generate PCTCDs, preliminary PATCDs, and OPCTCDs (if applicable).

[G] Review PCTCD, preliminary PATCD, and OPCTCD reports (if applicable), **AND** confirm that all container/payload certification parameters have been met.

NOTE

Containers designated for Controlled Shipment must be marked accordingly on PCTCD and applicable PATCD (Controlled Shipment designated container(s) assigned to payload); Attachment 4, CCP Shipping Site Control Checklist for Controlled Shipments, will be initiated for the applicable CH package/shipment.

NOTE

The PATCD is signed after the TRUPACT-IIs or HalfPACTs are loaded so that the final information is entered into the WDS.

- [H] Once container/payload parameter requirements have been met, sign and initial the PCTCD and OPCTCD (if applicable) reports, as required, certifying that CCP-PO-401 requirements have been satisfied.
-

NOTE

Once a CCP-PO-401 compliant payload assembly is approved, the payload is physically assembled (SWBs, drums, and shielded containers) in accordance with DOE/WIPP 02 3184, CH Packaging Operations Manual, or DOE/WIPP 02-3220, as applicable, and this procedure.

4.1.3 Creating Shipments Using the WDS

- [A] Enter the following information into the WDS:
- Shipment Number (From WIPP 8-week Rolling Schedule).
 - Shipping Program (Site ID)
 - Current Location (Site ID)
 - Destination Site (Site ID)
- [B] Select payloads until a CCP-PO-401 compliant payload set is obtained.
- [C] Once the virtual CCP-PO-401 compliant shipment is built, then select the submit button.
-

NOTE

Transporter, Tractor, Trailer, and CH Package numbers are obtained from the WIPP Equipment Assignment email, generated by the WIPP Transportation Group. Default values contained in the WDS system are used for Handling Material Weights and Uncertainty. Handling Material weights uncertainty is left blank in the WDS system.

[D] When the following becomes available, enter the information into the WDS:

- Transporter Name
- Tractor Number
- Trailer Number
- CH Package Number/s
- Handling Material Weights (if applicable)

[E] For controlled or High Wattage shipment, email the WIPP Shipment Scheduler and the Generator Site POC of impending shipment.

4.2 Shipment Approval

4.2.1 Notify CCP WCO of impending shipment by e-mailing the draft PATCD's.

4.2.2 WCO perform the following:

- [A] Obtain current forms from site receiving Intersite Shipment.
- [B] Complete all applicable forms required by receiving site.
- [C] Forward forms and container radiological surveys to responsible parties at receiving site for review and/or approval.
- [D] Obtain a copy of all signed and approved forms from receiving site.
- [E] Notify the TCO by e-mail the approval from receiving site of drums selected for Intersite Shipment.

4.3 Finalizing Shipments Using the WDS:

4.3.1 Enter the following information into the WDS:

- Manifest Number
- Outer Containment Assembly (OCA) Lid Number (for each TRUPACT-II or HalfPACT) from DOE/WIPP-02-3184, Attachment 2, CH Packaging Loading Data Sheet, or DOE/WIPP-02-3220, Attachment 2, High-Wattage CH Packaging Loading Data Sheet, as applicable.
- Inner Containment Vessel (ICV) closure date and time for each TRUPACT-II or HalfPACT, from Attachment 2, CH Packaging Loading Data Sheet, or DOE/WIPP-02-3220, Attachment 2, High-Wattage CH Packaging Loading Data Sheet, as applicable.
- Dose Rate Surface (mrem/hr) (for each TRUPACT-II or HalfPACT) from Radiological Survey Report.
- Dose Rate 1-meter (mrem/hr) (for each TRUPACT-II or HalfPACT) from Radiological Survey Report.
- Dose Rate 2-meters (mrem/hr) (for each TRUPACT-II or HalfPACT) from Radiological Survey Report.
- Alpha contamination survey results in dpm (for each TRUPACT-II or HalfPACT) from Radiological Survey Report.
- Beta/gamma contamination survey results in dpm (for each TRUPACT-II or HalfPACT) from Radiological Survey Report.
- U.S. Department of Transportation (DOT) Description (for each TRUPACT-II or HalfPACT) from Bill of Lading or UHWM.
- Reportable Quantity (RQ) or Highway Route Controlled Quantity (HRCQ) flag(s) (as applicable) from Bill of Lading or UHWM.

4.3.2 Select Save.

4.3.3 Print final PATCDs.

4.3.4 Review PATCDs, **AND** sign reports if all parameters are correct and in compliance with CCP-PO-401.

4.3.5 Enter the send date and time in WDS.

4.3.6 Select the Finalize button to complete the WDS process.

4.4 Shipping Preparations

NOTE

Email notifications may be performed by Host site Shipping Coordinator.

4.4.1 Transmit the draft PATCDs (if applicable), WDS Shipment Summary Report, and WDS Shipment Data report to the Host site Shipping Coordinator for preparation of shipping papers.

4.4.2 Host site Transportation Personnel, develop shipping papers.

4.4.3 Host site Shipping Coordinator, provide TCO with draft copy of shipping paper and RadCalc work sheets (or equivalent).

4.4.4 Review the shipping documentation (Bill of Lading or UHWM) in accordance with 49 CFR Part 172, Subpart C, *Shipping Papers*.

NOTE

Completion of a site-specific LDR is necessary only for each initial shipment of a mixed waste stream. The site-specific LDR is completed in accordance with 40 CFR Part 268. The generator site will supply the site-specific LDR required by their site.

4.4.5 Complete site-specific LDR (if applicable).

4.4.6 Provide copy of site-specific LDR to Host site Shipping Coordinator (if applicable).

4.4.7 Host site Shipping Coordinator, attach copy of site-specific LDR to the shipping papers, (if applicable).

4.4.8 As soon as available, prior to releasing the shipment, email a copy of the Draft Manifest and site-specific LDR (if applicable) to the WIPP Transportation group and the Receiving Site Transportation group.

NOTE

If the TRANSCOM system is out of service, secondary shipment protocol is followed, as directed by the WIPP Transportation group. Step 4.4.9 can be omitted.

4.4.9 Prior to releasing the shipment to the carrier prepare the TRANSCOM system by entering a Draft Bill of Lading or UHWM in TRANSCOM per the guidance found in the TRANSCOM 2000 Designated User Handbook.

4.4.10 Email Draft Bill of Lading or UHWM to TRANSCOM. TRANSCOM email is transcom@transcom.energy.gov.

4.4.11 Host site Shipping Coordinator, notify the applicable SMVD at least 24-hours prior to releasing a shipment.

[A] Request the performance of a CVSA inspection at the Host site of the trailer, tractor, and loaded CH Packaging Containers.

4.5 Inspections and Loading Operations

4.5.1 Verify that the payload containers are DOT Type 7A or equivalent (e.g., 17C, 17H, UN1A2).

NOTE

The specific filter information is listed on the applicable PCTCD or OPCTCD.

4.5.2 Verify filter vents, as specified in Section 2.5 of CCP-PO-401 and Section 6.12 of *CH TRU Payload Appendices* (as applicable), are installed in payload containers.

4.5.3 Perform Container Integrity Inspection on each payload container identified for shipment per Attachment 2, CCP Container Integrity Checklist.

4.5.4 Print name, sign, and date Attachment 2.

4.5.5 Ensure the following labels are clearly marked on each payload container:

- [A] Unique Identification Number (Bar Code).
 - Minimum (3) per 55-gal., 85-gal., and 100-gal. drum and shielded overpack
 - Minimum (2) per SWB
 - Minimum (1) per TDOP
- [B] Caution Radioactive Material Label.
- [C] When applicable, Hazardous Waste Label.
- [D] When applicable, Polychlorinated Biphenyl (PCB) Label.
- [E] When applicable, Beryllium Label (Required at Advanced Mixed Waste Treatment Project [AMWTP] only).

NOTE

The dunnage container(s) SHALL be labeled with a unique identification number. Exception: seven packs, four packs, three packs, or SWBs, are **NOT** required to be numbered uniquely. All dunnage containers SHALL also be labeled Dunnage or Empty. Dunnage containers are labeled in accordance with site-specific procedures.

4.5.6 For each CH Package that has a dunnage container, complete Attachment 1, CCP Dunnage Certification Statement.

4.5.7 Print name, sign, date, and initial Attachment 1.

4.5.8 Ensure that each waste container is checked to see that there are **NO** Hold Tags attached.

- [A] **IF** a Hold Tag is found, notify WCO, **THEN** determine the disposition to ensure that the container is acceptable for shipping.

4.5.9 Host site RCT **OR** equivalent position, provide Container Contamination Survey Reports to the TCO.

4.5.10 Provide PATCDs to CCP CH Packaging and Transportation Team.

4.5.11 Record applicable Payload Pallet Identification Number or SWB Ratchet Strap Serial Numbers and inspection date on Attachment 3, Payload Accessories.

NOTE

Host site personnel may assemble payload containers under the direction of a qualified CH Packaging Operator or TCO.

4.5.12 CH Packaging and Transportation Team assemble the payload containers into a payload assembly in accordance with DOE/WIPP 02-3184, or DOE/WIPP-02-3220 (as applicable) or approved site-specific procedures.

NOTE

Dose Rate readings: on contact, and 1-meter, including neutron contribution.

4.5.13 Host site RCT OR equivalent position, provide dose rate survey of the payload assembly.

4.5.14 Perform the following:

- [A] Verify, from the applicable PATCD, that the selected containers within a payload are correct for the designated CH Packaging Container to be loaded.
- [B] Verify that all of the visible container ID labels are an exact match to the ID numbers listed of the PATCD.
- [C] Record on the payload, the designated CH Packaging number, payload ID number, initials, and date.
- [D] If not already performed, provide PATCDs to the CCP CH Packaging and Transportation Team.

4.5.15 CCP CH Packaging and Transportation Team perform the following:

- [A] Verify from the applicable PATCD, that the selected containers within a payload are correct for the designated CH Packaging Container to be loaded.
- [B] Verify that all of the visible container ID labels are an exact match to the ID numbers listed on the PATCD.

4.5.16 CCP CH Packaging and Transportation Team, load the payload assembly into the CH Packaging Containers in accordance with DOE/WIPP-02-3184 or DOE/WIPP 02-3220 (as applicable).

NOTE

If High-Wattage shipments are loaded per DOE/WIPP 02-3220, then the attachments found in DOE/WIPP-02-3220 will be used.

4.6 Controlled Shipment Processing

4.6.1 **IF** Controlled Shipment Payload, other than High-Wattage, **THEN** record applicable dates and times of ICV lid installation on Attachment 4, **AND** ensure 24-hour Loading Time will not be exceeded.

4.6.2 **IF** total loading time is calculated to be \geq 24-hours, **THEN** vent the package, **AND** repeat the lid installation process.

NOTE

Dose Rates readings: on Contact, 1-meter, and 2-meter including neutron contribution.

4.6.3 Host site RCT **OR** equivalent position, provide the dose rate and contamination surveys of CH packaging container exteriors to the TCO.

4.6.4 Review the survey report of the loaded CH Packaging Containers, **AND** verify that the survey data meets applicable radiation/contamination requirements.

4.7 Shipping Completion

4.7.1 Host site Transportation personnel, perform marking, labeling, and placarding (if applicable) of the CH Packages and Transport Trailer.

4.7.2 Ensure correct marking, labeling, and placarding (if applicable) per the following:

[A] Marking of CH Packaging Container shipments of CH TRU waste is conducted in accordance with 49 CFR Part 172, Subpart D, *Marking*, § 172.300 through 172.338; 40 CFR Part 262, Subpart C, § 262.32, *Marking*; and 40 CFR 761.40 Subpart C, *Marking of PCBs and PCB Items*.

- [B] Labeling of CH Packaging Container shipments of CH TRU waste is conducted in accordance with 49 CFR Part 172, Subpart E, *Labeling*, § 172.400 through 172.450, and 40 CFR Part 262, Subpart C, § 262.31, *Labeling*.
- [C] Placarding of CH Packaging Container transport vehicles of CH TRU waste is conducted in accordance with 49 CFR Part 172, Subpart F, *Placarding*, § 172.500 through 172.560, and 40 CFR Part 262, Subpart C, § 262.33, *Placarding*.

4.7.3 Trucking company, attach tractor to the trailer.

4.7.4 **IF** the shipment contains Controlled Shipment Packages, **THEN** provide the following to the Host site Transportation personnel (as applicable):

- [A] For High-Wattage Shipments, a copy of Attachment 9 from procedure DOE/WIPP 02-3220.

- [B] For Controlled Shipments, a copy of Attachment 4 from this procedure.

4.7.5 If the shipment contains High Wattage Packages, TCO contact the WIPP CMR and receipt POC, for notification of impending High Wattage Shipment.

4.7.6 Host site transportation personnel, sign the shipping documentation (Bill of Lading or UHWM) in accordance with 49 CFR Subpart C.

4.7.7 Host site transportation personnel, provide carrier with appropriate shipping documentation package, including LDR (if applicable), and controlled shipment package attachments (if applicable).

4.7.8 SMVD, perform CVSA inspection of the tractor, trailer, and CH packages.

4.7.9 Host site Transportation personnel, provide TCO with a signed copy of the shipping documentation (Bill of Lading or UHWM).

4.7.10 Ensure Shipment Radiological Information is emailed to WIPP RCT group.

4.7.11 **IF** the shipment contains Controlled Shipment Packages, **THEN** ensure Attachment 9 from DOE/WIPP 02-3220 or Attachment 4, from this procedure (as applicable) is emailed to WIPP Transportation and the receipt site POC.

- 4.7.12 Ensure Attachment 3 is emailed to WIPP Transportation.
- 4.7.13 For shipment finalization, complete Section 4.3.
- 4.7.14 TCO **OR** Host Site Shipping Coordinator, contact receipt site POC **AND** notify site of pending release of shipment, (if applicable).
- 4.7.15 TCO **OR** Host Site Shipping Coordinator, contact WIPP Central Monitoring Room, **AND** request to release shipment.
- 4.7.16 Once approval is granted, TCO or Host Site Shipping Coordinator, release shipment.
- 4.7.17 Change WDS status to "In Transit".

4.8 Shipment Receipt

NOTE

Receipt sites may use CBFO-approved site-specific Controlled Shipment or High-Wattage Receipt Forms in place of CCP-TP-405, Attachment 5 or DOE/WIPP-02-3220, Attachment 10, provided that the same information is recorded **AND** a completed copy is returned to the applicable TCO.

- 4.8.1 **IF** the shipment contains Controlled Shipment Packages, **THEN** request the Receipt Site to email the following (as applicable) once the payloads are unloaded.
 - [A] For High-Wattage Shipments, completed Attachment 10 from procedure DOE/WIPP 02-3220, or site equivalent form.
 - [B] For Controlled Shipments, completed Attachment 5 from this procedure, or site equivalent form.
- 4.8.2 Enter the receipt date and time in WDS.
- 4.8.3 **ONCE** the shipment status in WDS is "Shipment Received," **THEN** send an email to the Host site Shipping Coordinator, stating shipment received with the date of receipt.
- 4.8.4 **ONCE** the shipping data entry is complete, **THEN** compile and submit items listed in Section 5.1.1 to CCP Records.

5.0 RECORDS

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

NOTE

Records generated by DOE/WIPP-02-3184 and DOE/WIPP-02-3220 (see Section 3.1.4), as applicable, are included in the Shipping Documentation Package.

5.1.1 QA/Nonpermanent

[A] Shipping Documentation Package:

- [A.1] PATCD, PCTCD, and OPCTCD Spreadsheet(s), as applicable
- [A.2] Shipment Data Report
- [A.3] WCO Shipment Approval Report/Email
- [A.4] Attachment 1, CCP Dunnage Certification Statement (complete one statement for each group of dunnage containers) (if applicable)
- [A.5] Attachment 2, CCP Container Integrity Checklist
- [A.6] Attachment 3, Payload Accessories
- [A.7] Attachment 4 – CCP Shipping Site Control Checklist for Controlled Shipments
- [A.8] Attachment 5 – CCP Receiving Site Control Checklist for Receipt of Controlled Shipments
- [A.9] Fax or e-mail correspondence, (if applicable)
- [A.10] Draft Bill of Lading or UHWM, (if applicable)

Attachment 1 – CCP Dunnage Certification Statement

Payload ID _____

Record dunnage container numbers.

_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____

	Acceptance Criteria	Initials
Container Type	55-gal. drum, 85-gal. drum, 100-gal. drum, or SWB (circle one)	
Container Weight	Record Weight	
Surface Contamination	<20 dpm / 100 cm ² alpha <200 dpm / 100 cm ² beta-gamma	
Container Marking	"Dunnage"	
Liquids	Dry	
Pu-239 FGE	Zero	
Thermal Power	Zero	
Dunnage properly vented?	Minimum one open vent port.	
Comments:		

I certify that I have reviewed the data for this assembly dunnage and have determined that it meets the requirements stated in the current revision of CCP-PO-401.

TCO:

Printed Name/Signature

Date

Initials

Attachment 2 – CCP Container Integrity Checklist

Payload ID _____

Record container numbers for the selected payload assembly.

_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____

NOTE

Any YES answer on the inspection checklist will result in the operator immediately contacting the TCO. The TCO will have the drum segregated **AND** the appropriate site-specific corrective actions invoked. The TCO will provide another waste container **OR** dunnage for the selected payload assembly. The new waste container will require the same inspection per the checklist.

Visually examine 100% of each container for selected payload assembly per the checklist below.

CONTAINER EXAMINATION		DISCUSSION OF CRITERIA	CHECK ONE	
1.	Is the payload container obviously degraded?	Obviously degraded means clearly visible and potentially significant defects in the payload container or payload container surface.	YES <input type="checkbox"/>	NO <input type="checkbox"/>
2.	Is there evidence that the payload container is, or has been, pressurized?	Pressurization can be indicated by a fairly uniform expansion of the sidewalls, bottom or top. Past pressurization can be indicated by a notable outward deflection of the bottom or top. Verify that the drum payload container is not warped.	YES <input type="checkbox"/>	NO <input type="checkbox"/>

Attachment 2 – CCP Container Integrity Checklist (Continued)

CONTAINER EXAMINATION		DISCUSSION OF CRITERIA	CHECK ONE	
3.	Is there any potentially significant rust or corrosion such that wall thinning, pin holes, or breaches are likely or the load bearing capacity is suspect?	<p>Rust shall be assessed in terms of its type, extent, and location. Pitting, pocking, flaking, or dark coloration characterizes potentially significant rust or corrosion. This includes the extent of the payload container surface area covered, thickness, and, if it occurs in large flakes or built-up (caked) areas. Rusted payload containers may not be accepted if:</p> <ul style="list-style-type: none"> • Rust is present in caked layers or deposits • Rust is present in the form of deep metal flaking, or built-up areas of corrosion products <p>In addition, the location of rust should be noted; for example on a drum: top lid; filter region; locking chine; top one-third, above the second rolling hoop; middle one-third, between the first and second rolling hoops; bottom one-third, below the second rolling hoop; and on the bottom.</p> <p>Payload containers may still be considered acceptable if the signs of rust show up as:</p> <ul style="list-style-type: none"> • Some discoloration on the payload container • If rubbed would produce fine grit or dust or minor flaking (such that wall thinning does not occur) 	YES <input type="checkbox"/>	NO <input type="checkbox"/>
4.	Are any of the following apparent? <ul style="list-style-type: none"> • wall thinning • pin holes • breaches 	Wall thinning, pin holes, and breaches can be a result of rust/corrosion (see discussion for #3).	YES <input type="checkbox"/>	NO <input type="checkbox"/>
5.	Are there any split seams, tears, obvious holes, punctures (of any size), creases, broken welds, or cracks?	<p>Payload containers with obvious leaks, holes or openings, cracks, deep crevices, creases, tears, broken welds, sharp edges or pits, are either breached or on the verge of being breached. Verify that there is no warpage that could cause the container to be unstable or prevent it from fitting properly in the applicable package.</p>	YES <input type="checkbox"/>	NO <input type="checkbox"/>

Attachment 2 – CCP Container Integrity Checklist (Continued)

	CONTAINER EXAMINATION	DISCUSSION OF CRITERIA	CHECK ONE	
6.	Is the load-bearing capacity suspect?	The load-bearing capacity could be reduced for excessive rust (see discussion for #3), wall thinning (see discussion for #4), breaches, cracks, creases, broken welds, etc. (see discussion for #5).	YES <input type="checkbox"/>	NO <input type="checkbox"/>
7.	Is the payload container improperly closed?	Inspect the fastener and fastener ring (chine) if applicable for damage or excessive corrosion. Check the alignment of the fastener to ensure that it is in firm contact around the entire lid and the payload container will not open during transportation.	YES <input type="checkbox"/>	NO <input type="checkbox"/>
8.	Are there any dents, scrapes, or scratches that make the payload container's structural integrity questionable or prevent the top and bottom surfaces from being parallel?	Deep gouges, scratches, or abrasions over wide areas are not acceptable. If top and bottom surfaces are not parallel, this would indicate that the container is warped. Dents should be less than ¼ inch deep by 3 inches long and between ½ inch to 6 inches wide. All other dents must be examined to determine impact of structural integrity.	YES <input type="checkbox"/>	NO <input type="checkbox"/>
9.	Is there discoloration which would indicate leakage or other evidence of leakage of material from the payload container?	Examine the payload container regions near vents, top lid fittings, bottom fittings, welds, seams and intersections of one or more metal sheets or plates. Payload containers must be rejected if evidence of leakage is present.	YES <input type="checkbox"/>	NO <input type="checkbox"/>
10.	Is the payload container bulged?	For the purposes of this examination, bulging is indicated by: <ul style="list-style-type: none"> • A fairly uniform expansion of the sidewalls, bottom, or top (e.g., in the case of a drum, either the top or bottom surface protrudes beyond the planar surface of the top or bottom ring, • A protrusion of the side wall (e.g., in the case of a drum, beyond a line connecting the peaks of the surrounding rolling hoops or a line between a surrounding rolling hoop and the bottom or top ring), or • Expansion of the sidewall (e.g., in the case of a drum, such that it deforms any portion of a rolling hoop). 	YES <input type="checkbox"/>	NO <input type="checkbox"/>

| Attachment 2 – CCP Container Integrity Checklist (Continued)

Page 4 of 4

Comments: _____

Inspected By:

Printed Name

Signature

Date

Attachment 3 – Payload Accessories

CH Package S/N	Payload Pallet ID# and Inspection Date	SWB Ratchet Strap S/N and Inspection Date	SWB Ratchet Strap S/N and Inspection Date	SWB Ratchet Strap S/N and Inspection Date
Position #1: _____				
Position #2: _____				
Position #3: _____				

Shipment Number: _____

Trailer Number: _____

Attachment 4 – CCP Shipping Site Control Checklist for Controlled Shipments

Shipment No. _____ Packaging No. _____.

To be completed by CCP Transportation Certification Official, or designee, for each package designated as a controlled shipment.

Activity	Date	Time	Completion of Activity (Indicate by initials)
Record date and time of ICV lid installation from Attachment 2, DOE/WIPP-02-3184 <i>CH Packaging Operations Manual</i> .			
Record date and time the shipment containing the loaded package is ready to depart from the site.			
Calculate and record total Loading Time. (Limit = 24-hours)			
<p><i>Total Loading time ≤ 1 day, sign and date below.</i></p> <p><i>Total Loading Time > 1 day, STOP, vent package, and repeat closure process.</i></p>			
<p>I certify the above data is accurate and compliant with the Loading Time limit of 24-hours, as specified in Section 6.2.3 of the CCP CH-TRAMPAC.</p>			
<p>_____</p>			
CCP Transportation Certification Official (or designee)	Date		

*Control shipments (10 days) shall be made in accordance with the conditions specified in Appendix 3.6 of the *CH-TRU Payload Appendices* and CCP CH-TRAMPAC Section 6.2.3.

Attachment 5 – CCP Receiving Site Control Checklist for Receipt of Controlled Shipments

Page 1 of 1

Shipment No. _____ Packaging No. _____.

To be completed by designated Receiving Site Operations personnel for each package designated as a controlled shipment:

Activity	Date	Time	Completion of Activity (Indicate by initials)
Vent package within 9-days of date and time recorded above and record vent date and time.			
I certify the above data is accurate and compliant with the Unloading Time of 9-days, as specified in Section 6.2.3 of the CCP CH-TRAMPAC.			
Receiving Site Personnel	Site	Date	

*Control shipments (10 days) shall be made in accordance with the conditions specified in Appendix 3.6 of the *CH-TRU Payload Appendices* and Section 6.2.3 of the CCP CH-TRAMPAC.