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RCT-PXP-007

Revision 0

Project Execution Plan for the CCP Procedure Changes to Support Section 311 Implementation

EFFECTIVE DATE: 07/31/2006

[redacted]

Approved for Use

RECORD OF REVISION

Revision Number	Date Approved	Description of Revision
0	07/27/2006	Initial issue.

TABLE OF CONTENTS

1.0 PROJECT OVERVIEW 4
2.0 CONTRACT OVERVIEW 5
3.0 PROJECT ORGANIZATION 7
4.0 PROJECT ADMINISTRATION 8
5.0 PROJECT BUDGET AND SCHEDULE 9
6.0 PROJECT RESOURCES 10
7.0 UNIQUE PROJECT CONSIDERATIONS 11
8.0 ENGINEERING AND DESIGN 11
9.0 PROCUREMENT AND MATERIALS MANAGEMENT 11
10.0 PROJECT CONTROLS 11
11.0 PROJECT QUALITY PLAN 13
12.0 CONSTRUCTION 13
13.0 COMMISSIONING AND START-UP 13
14.0 ENVIRONMENT, SAFETY, AND HEALTH 14
15.0 RISK MANAGEMENT PLAN 14
16.0 PROJECT CLOSEOUT 15
17.0 PROJECT PROCEDURES 15

1.0 PROJECT OVERVIEW

The changes to the Waste Isolation Pilot Plant's (WIPP) Hazardous Waste Facility Permit proposed in the Section 311/RH PMR are important aspects to the U.S. Department of Energy's (DOE) National Transuranic (TRU) Waste Program long term strategy. The major categories and task managers for Washington TRU Solutions (WTS) implementation of the permit changes are:

1. Draft/Final Permit GAP Analysis ([redacted] WRES)
2. Volatile Organic Compound (VOC) Room Based Monitoring ([redacted], WRES)
3. Confirmation Module ([redacted], WWIS)
4. Acceptable Knowledge (AK) Sufficiency Determination Process ([redacted], WRES)
5. Permittees' Confirmation ([redacted], WRES)
6. TRU Waste Acceptance Criteria (WAC) ([redacted], WRES)
7. Remote-Handled (RH) Payloads and Ancillary Systems ([redacted], Transportation)
8. RH Facility Construction Certification Package ([redacted], Engineering)
9. Storage Increase ([redacted], Operations)
10. Nuclear Safety Documentation ([redacted], Nuclear Safety)
11. Characterization Transition ([redacted], WRES)
12. Generator Training and Guidance ([redacted] WRES)
13. Permit Public Access dBase/E-Mail Notification System ([redacted] WRES)

Retrieval, Characterization, and Transportation (RCT) is a department within the WTS. The Central Characterization Project (CCP) within the RCT provides waste characterization, packaging and transportation services to DOE generator sites that require waste characterization and disposal of Contact-Handled (CH) TRU waste at the WIPP.

The purpose of this PXP is to identify tasks, assign responsibilities, and develop a schedule associated with revising the CCP procedures in support of Section 311 WIPP Hazardous Waste Facility Permit changes. The list of CCP procedures that require revision are specified in Section 17.0 of this PXP. These procedures are utilized by CCP to characterize and certify TRU waste for disposal at the WIPP. The tasks in this Project Execution Plan (PXP) are associated with Item 11 (above), Characterization Transition.

This PXP is in the early stages of development and will be updated as the project matures. Another related PXP is titled Section 311/RH Waste Analysis Plan Implementation and was prepared by [redacted]

2.0 CONTRACT OVERVIEW

The Carlsbad Field Office (CBFO) Work Breakdown Structure (WBS) is shown in Figure 1.

Permitting support and the associated CCP activities described in this PXP will be implemented as part of the RCT scope of work which is funded within the Waste Services WBS element 1.1.

The CCP will characterize and certify CH-TRU waste at the following three DOE sites in FY-2006: Savannah River Site (SRS), Los Alamos National Laboratory (LANL), and the Idaho National Laboratory (INL).

Other work supported by the CCP organization during FY-2006 will include characterization optimization activities necessary to provide efficient and productive operations at the DOE sites. Such activities include characterization and/or certification of special case wastes (i.e., classified wastes, preparations for large box characterization, orphan wastes, waste repackaging).

Carlsbad Field Office Work Breakdown Structure
August 10, 2005

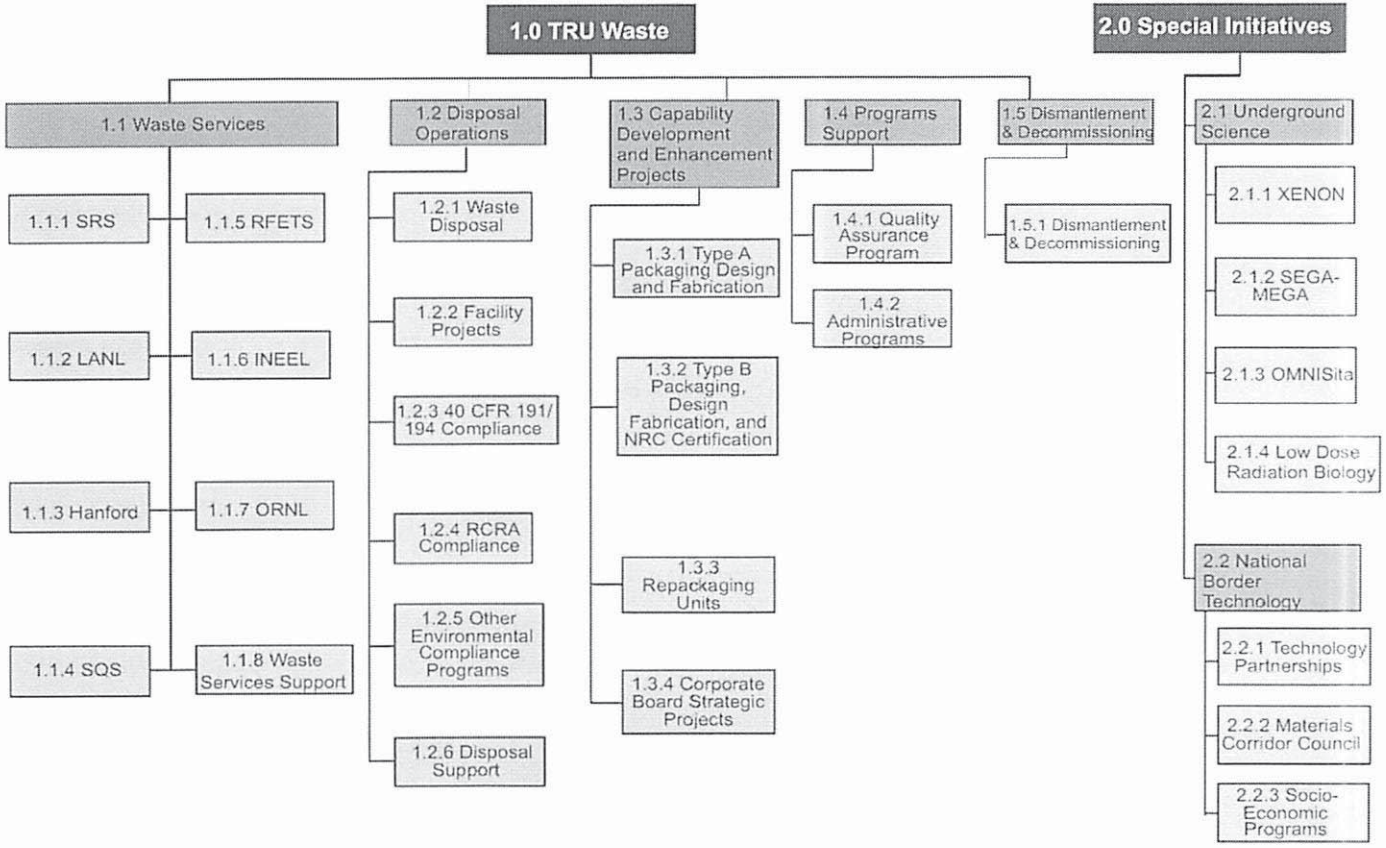


Figure 1. Carlsbad Field Office (CBFO) Work Breakdown Structure (WBS)

3.0 PROJECT ORGANIZATION

The Project Sponsor is the Deputy Manager, CCP Characterization. The CCP Manager has the overall responsibility for revising and implementing the CCP procedures in support of the Section 311 permit modification. The Site Project Manager (SPM) has the responsibility for developing and implementing this PXP.

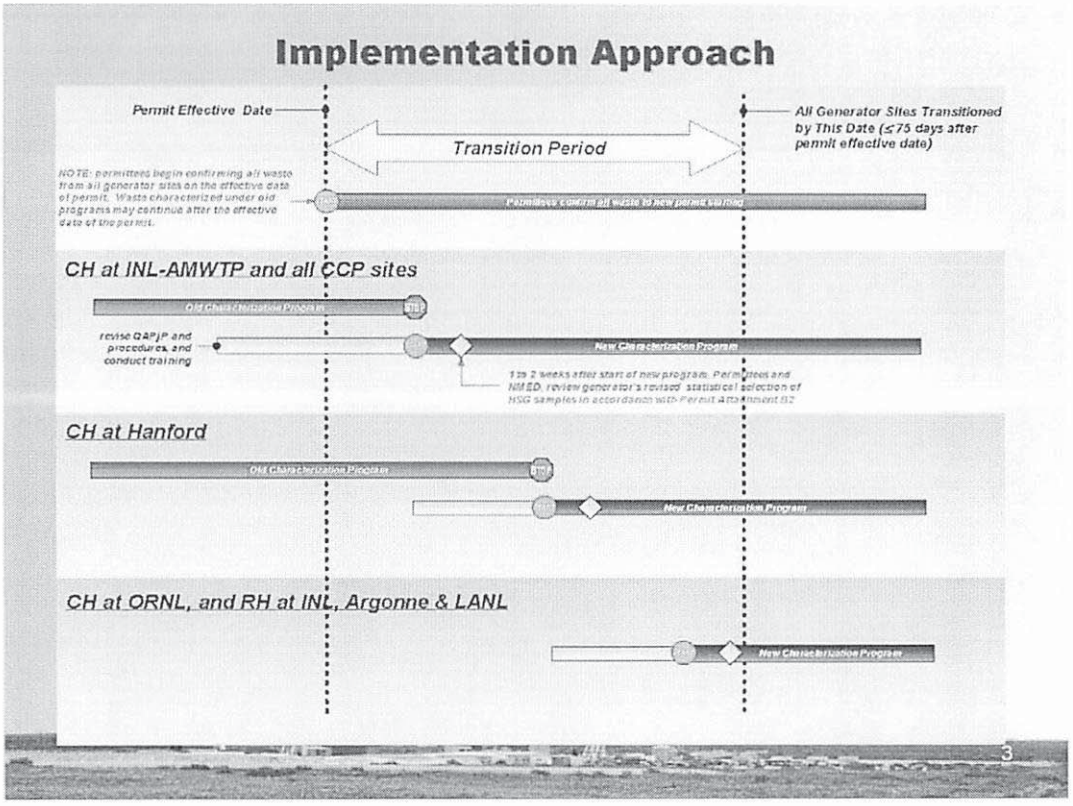
Figure 2. [redacted]

4.0 PROJECT ADMINISTRATION

5.0 PROJECT BUDGET AND SCHEDULE

No additional funding has been provided for the implementation of this PXP. The complete schedule for the work scope covered by this PXP is being determined and will be included in future revisions.

The CBFO has developed the following DOE Complex Implementation Approach for the Section 311 WIPP Hazardous Waste Facility Permit change:



The CCP proposed schedule is included below and is based on the CBFO provided Implementation Approach:

Anticipated permit issue date: September 28, 2006
Effective date: October 28, 2006

#	ACTIVITY	INL\ CCP	LANL	SRS
1	Begin 311 Orientation/Training	6/15/06	6/15/06	6/15/06
2	Complete 311 Orientation/Training	8/31/06	8/31/06	8/31/06
3	Start draft procedure/program changes	6/15/06	6/15/06	6/15/06
4	Complete draft procedure/program changes	10/06/06	10/06/06	10/06/06
5	Submit to CBFO for approval	10/06/06	10/06/06	
6	CBFO review and approval	10/28/06	10/28/06	10/28/06
7	Issue revised procedures	10/30/06	10/30/06	11/06/06*
8	Complete training/qualification	11/06/06	11/06/06	11/13/06*
9	Begin characterization	11/06/06	11/06/06	11/13/06*
	Complete statistical selection for HSG Samples	11/01/06	11/01/06	11/06/06*

*Due to the CCP SRS Recertification Audit scheduled for October 23 through November 3, 2006, the implementation of the revised procedures at SRS will be delayed one week.

NOTE: CBFO has advised CCP that within 1 to 2 weeks after implementation of the new procedures for each site, Permittees (CBFO and WTS) will review the statistical selection of waste containers identified for HSG Sampling.

6.0 PROJECT RESOURCES

The personnel will be identified in Revision 1 of this PXP. Roles and responsibilities during the procedure revision and implementation period will be delineated.

7.0 UNIQUE PROJECT CONSIDERATIONS

CCP will accomplish its mission following accepted project management principles, including the development and execution of this PXP. Integration activities include coordination with the project team and CBFO. The order and schedule for implementation of the revised procedures at the INL, LANL, and SRS will be determined in cooperation with CBFO. Ultimately, CBFO will determine adequacy of the procedures and implementation. Approval to certify and ship waste containers using these revised CCP procedures will be determined by CBFO.

This PXP will be issued and controlled. This plan describes the plans and objectives for the project and establishes a structure for conducting work processes for the project. This formal structure will include the following:

- Establishment of baseline project schedules for the project;
- Maintaining project action tracking and completion;
- Develop informational briefings for WTS and CBFO management;
- Develop an agenda and establish monthly Project Reviews.

8.0 ENGINEERING AND DESIGN

No engineering or design activities will be used by this project.

9.0 PROCUREMENT AND MATERIALS MANAGEMENT

No procurement and materials management services will be used by this project.

10.0 PROJECT CONTROLS

The project control system seeks to be responsive to internal management requirements and provide WIPP participants with increased cost and schedule performance visibility of the accomplishment of project objectives. In addition to providing a formal integrated schedule and resource plan, the management control system provides analysis of planned versus actual performance and early detection or prediction of problems that require management attention.

In summary, the WIPP Project Control System provides for:

- Organization: Contractual efforts are established and responsibilities assigned for the work.
- Planning and Budgeting: Work is formally planned, scheduled, budgeted and authorized.

- Accounting: Costs of work and material are accumulated.

- Analysis: Planned and actual performance is compared and variances analyzed.

- Revisions and Access to Data: Estimates of final costs are developed along with methods to incorporate baseline changes in these estimates.

- Risk Management: Describes the WIPP risk identification, assessment, mitigation, and monitoring process.

The CBFO Office of Business is responsible for interpreting the requirements of this document as they apply to a particular program situation and for maintaining and updating this document, including coordinating changes with other project participants when appropriate.

The CBFO Baseline is actually comprised of three baselines that integrate the schedule, cost, and performance measures for the site. These baselines are as follows:

- Schedule Baseline: The Integrated Project Schedule is the primary controlled schedule from which schedule performance is measured. It is used to status and update summary level schedules. Only changes authorized through the Baseline Change Control process are incorporated into the schedule baseline.

- Cost Baseline: Contract funding levels, contained in the fiscal year program guidance letter from CBFO plus approved changes, are allocated to Cost Account Plans (CAPs), developed at Level 5 of the WBS, to form the cost baseline.

- Performance Measurement Baseline: The Performance Measurement Baseline (PMB) is the time phased budget plan against which cost and schedule performance are measured. The resource loaded schedule activities contained in the Complex Wide Integration Tool (CWIT) form the basis of the PMB.

On a project of this scale, with its technical complexities and uncertain conditions, changes are inevitable. The magnitude and range of unknowns, as well as potentially changing regulatory requirements, necessitate identifying, implementing, and managing changes effectively. Cost and schedule baselines are generally controlled by Revision 1 of CAO-95-1122, *CBFO Change Control Process* CAO-95-1122.

This PXP addresses the CCP scope, schedule, and budget associated with this PXP implementation. Formal processes are established and documented in this PXP for communications, configuration control, and issues management. The PXP will be controlled by CCP to ensure that revisions are processed and approved by appropriate parties; that distribution is maintained, and that associated changes are maintained for record purposes.

11.0 PROJECT QUALITY PLAN

The requirements driving Quality Assurance (QA) programs are specified in federal and state regulations, orders, agreements, licenses, and waste shipping and acceptance criteria. QA program requirements affect every aspect of the project and emphasize planning, implementing, reporting, assessing, and improving, to ensure processes, items, or services meet the expectations of CCP customers.

The QA Program is a performance based program designed to ensure that the 10 criteria of the Nuclear Safety Management 10 CFR 830.120, *Quality Assurance Requirements* (Rule); and the DOE Order 414.1, *Quality Assurance*, are met. The Rule applies to activities with the potential to cause radiological harm, while the Order applies to all other site activities. To meet these requirements, there is a QA Program for the site.

QA is a shared interdisciplinary function and responsibility. It involves management and individual contributions from all organizations responsible to produce items, perform activities, and independently verify that items and activities comply with specific requirements. Managers are responsible for knowing what requirements and standards to follow, and for determining what criteria apply to the specific activities. Others demonstrate their responsibility by following procedures and notifying the appropriate supervision with actual or potential problems and helping to resolve these problems with approved corrective actions. All employees are responsible for complying with quality requirements. In a projectized organization, it is imperative that QA personnel support the goals of the project and still maintain an independence that will help ensure appropriately implemented QA program requirements. Within the CCP projects, QA personnel are specifically trained to assess work quality on a particular project.

12.0 CONSTRUCTION

CCP performs no construction functions or activities as a part of this PXP.

13.0 COMMISSIONING AND START-UP

There is no traditional commissioning and start-up associated with this project. The procedures will be revised and then implemented after receiving approval from CBFO.

14.0 ENVIRONMENT, SAFETY, AND HEALTH

The safety targets for this project are zero lost time and zero recordable injuries. In the event of an injury, it will be investigated and corrective actions taken to prevent other injuries. The CCP procedure changes associated with this PXP do not change equipment operation and therefore would not result in causing an injury. Instead, these changes primarily provide for more efficient use of technical resources in reviewing characterization data packages. To ensure compliance with environment, safety, and health objectives, all procedure changes will be thoroughly reviewed by CCP and the Host site prior to issuance.

15.0 RISK MANAGEMENT PLAN

WTS managers involved in project execution participate in the identification and assessment of program risks. They review program documents, evaluate lessons learned, and use brainstorming and their own experience to identify risks. Project risks are identified in the following areas:

- Cost and Schedule
- Technical
- Programmatic (Obtaining and utilizing resources outside the control of the program manager)
- Support
- Safety
- Regulatory/Permitting
- Site specific (Including alternative site locations)

Once risks are identified, WTS categorizes the identified risks by probability and severity (consequences) of each event.

After risks have been identified and categorized, a risk management approach and mitigation actions are developed for each High and Medium risk. For Low risk elements not judged to require documented mitigation actions, WTS Managers assure that they are controlled through the normal management functions and work processes. All risks and mitigation actions are identified in the CBFO Risk Management Plan, which is updated annually.

In order to determine the effectiveness of the Risk Management Plan, the areas of Medium and High risks are monitored and statused during monthly program meetings with CBFO. In addition, periodic reassessments of programs are performed to determine if new areas of risk need to be identified and assessed.

Specific risks associated with the implementation of this PXP include the following:

- The Section 311 modification to the WIPP Hazardous Waste Facility Permit may be delayed or altered significantly. WTS mitigation includes close and frequent contact with the regulators.

- Insufficient resources to complete tasks on schedule. CCP management will receive frequent progress updates.

16.0 PROJECT CLOSEOUT

The project will be closed out when the appropriate CCP procedures have been revised and implemented, and CBFO has issued approval letters to CCP for the projects at INL, LANL, and SRS that they are certified under the revised (Section 311 modification) WIPP Hazardous Waste Facility Permit.

17.0 PROJECT PROCEDURES

The procedures that will be modified as a function of this PXP are as follows:

SRS	LANL	INL	All SITES	
			PO	TP
NDE-RTR	NDE-RTR	NDE-RTR		
CCP-TP-011	CCP-TP-053			
CCP-TP-053		CCP-TP-102	CCP-PO-001	CCP-TP-001
			CCP-PO-005	CCP-TP-003
				CCP-TP-005
NDA	NDA	NDA		CCP-TP-030
CCP-TP-048	CCP-TP-101	CCP-TP-109	QP	CCP-TP-033
	CCP-TP-103	CCP-TP-112	CCP-QP-002	
	CCP-TP-125			
HSG	HSG	HSG	INTERFACE	
CCP-TP-032	CCP-TP-106	CCP-TP-106	CCP-PO-004	
			CCP-PO-012	
			CCP-PO-024	
VE	VE	VE		
CCP-TP-113	CCP-TP-069	CCP-TP-006		
	CCP-TP-113			
		SAMPLING		
		CCP-PO-025		
		CCP-TP-008		

NOTE: Although the NDA procedures listed above are not part of the Section 311 Permit modification, the NDA procedures will be modified during the same period.