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Revision 0

Project Execution Plan for the Stand-Alone Contact-Handled TRU Waste Transportation Program for Intersite Shipments

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1.0 PROJECT OVERVIEW

This Project Execution Plan (PXP) has been prepared in accordance with WP 15-GM.01, *WTS Project Execution Plans*, to define scope, objectives, and overall approach to plan and implement activities needed to support the completion of intersite shipments of transuranic (TRU) waste under a "stand-alone" transportation program. To date, the Contact-Handled Transuranic Waste Authorized Methods for Payload Control (CH-TRAMPAC) (Reference 1) has been implemented for contact-handled transuranic (CH-TRU) waste shipments as part of a comprehensive Waste Isolation Pilot Plant (WIPP) characterization program largely dictated by the WIPP Hazardous Waste Facility Permit (Reference 2) requirements. With the anticipated issuance of a revised WIPP Hazardous Waste Facility Permit, as proposed in Section 311/RH Permit Modification Request, a need exists to define transportation requirements independent of other program requirements. In addition, the potential increase of intersite shipments (e.g., to consolidate waste characterization and repackaging activities at a hub site) highlights the need for a "stand-alone" transportation program. Such a transportation program would allow intersite shipments to be effectively and efficiently completed, with the complete "WIPP Characterization Program" implemented at the receiving hub site. A related activity (outside the scope of this PXP) is to determine areas of improvement in the CH-TRAMPAC document and prepare a future U.S. Nuclear Regulatory Commission (NRC) amendment to streamline the governing transportation program.

The Central Characterization Project (CCP) implementation of the CH-TRAMPAC will be revised to create a stand-alone transportation program. A stand-alone CCP transportation program may be implemented independent of the Permit, both for shipments to WIPP and for intersite shipments. Intersite shipments will be facilitated by the revision of CCP-PO-003, *CCP Transuranic Authorized Methods For Payload Control* (*CCP TRAMPAC)(*Reference 3) and implementing procedures to specifically address transportation requirements. The overarching purpose of this PXP is to identify and document the necessary tasks to create the stand-alone CCP transportation program and to implement the revised transportation program at individual sites to complete intersite shipments as directed by the U.S. Department of Energy-Carlsbad Field Office (DOE-CBFO).

Figure 1, Stand-alone CH-TRU Waste Transportation Program, presents an overview of this project and the related CH-TRAMPAC improvement task.

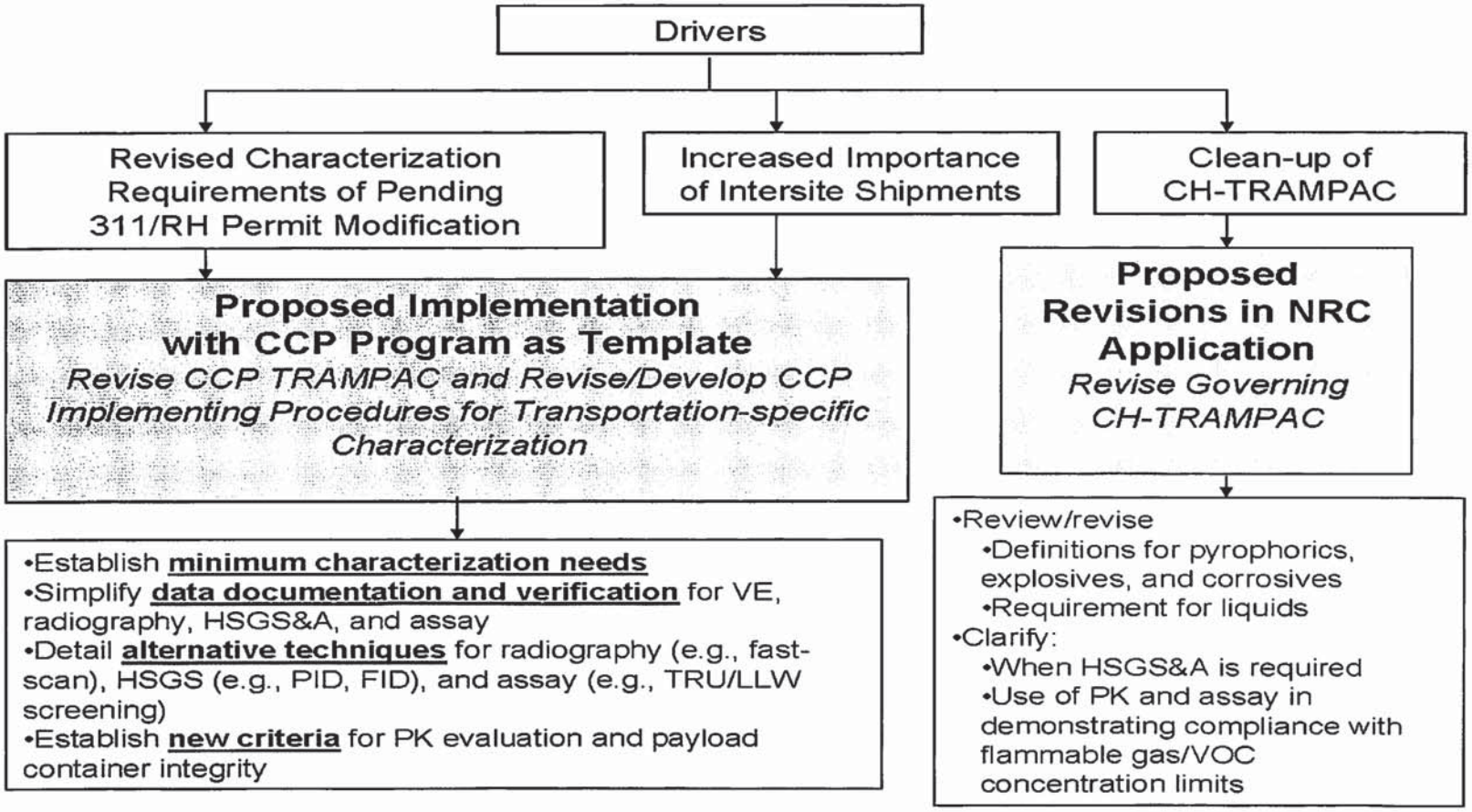

Figure 1. Stand-Alone CH-RU Waste Transportation Program

1.1 Project Key Tasks

Activities necessary to establish and implement a stand-alone CCP transportation program in accordance with all CH-TRAMPAC requirements will be identified and tracked to completion by means of weekly teleconferences and regular e-mail correspondence. Implementation of the resulting program for the completion of intersite shipments will be managed by similar methods.

1.1.1 Activities necessary to evaluate and revise the CCP transportation program:

- Establish minimum characterization needs for transportation compliance with the CH-TRAMPAC.
- Simplify data documentation and verification for the following compliance methods:
  - Visual examination (VE)
  - Radiography
  - Headspace gas (HSG) sampling and analysis
  - Assay.
- Evaluate the use of alternative techniques for the following compliance methods for possible inclusion in the CCP transportation program for intersite shipments:
  - Radiography (e.g., fast-scan)
  - HSG sampling and analysis (e.g., PID, FID)
  - Assay (e.g., fast-scan)
- Establish new criteria for the following:
  - Process knowledge evaluation
  - Payload container integrity
- Minimally revise the CCP-PO-003 as needed to refer to the implementation of the above items for intersite shipments.

1.1.2 Activities necessary to implement the revised CCP transportation program for the completion of intersite shipments as directed by DOE-CBFO:

- Evaluate the site-specific implementation of the CCP transportation program for intersite shipments and develop CCP/site interface plan.
- Coordinate required approvals (DOE-CBFO, state, receiving site).
- Complete necessary training and compliance documentation.

1.2 Project Schedule

1.2.1 The establishment of a stand-alone CCP transportation program must be completed by August 31, 2006, to support the September 2006 anticipated date for the issuance of the final §311/RH permit. Intersite shipments will be supported by this project as directed by DOE-CBFO.

1.3 Project Execution Plan Organization

1.3.1 The plan is organized to address each of the PXP elements identified by Attachment 2 of WP 15-GM.01. As directed by Section 3.0 of WP 15-GM.01, a graded approach has been used to determine which of those PXP elements are applicable to the project.

2.0 CONTRACT OVERVIEW

Because the project is to be wholly implemented within WTS, this PXP element is governed by the overall WTS prime contract.

3.0 PROJECT ORGANIZATION

Because the project is to be wholly implemented within WTS under the CCP program, this PXP element is covered by current WTS/CCP personnel and organization charts.

4.0 PROJECT ADMINISTRATION

Because the project is to be wholly implemented within WTS under the CCP program, this PXP element is governed by the overall WTS contract (e.g., for client interface) and the CCP program protocols (e.g., for document control and correspondence).

5.0 PROJECT BUDGET AND SCHEDULE

Because the project is to be wholly implemented within WTS, this PXP element is governed by the budgets and schedules established by the overall WTS contract.

6.0 PROJECT RESOURCES

Because the project is to be wholly implemented within WTS under the CCP program, this PXP element is governed by the overall WTS contract and current staffing and resources.

7.0 UNIQUE PROJECT CONSIDERATION

This PXP element is not applicable to the scope of this project. This project is not associated with any unique geographic, personnel, security, or other logistical considerations.

8.0 ENGINEERING AND DESIGN

This PXP element is not applicable to the scope of this project. This project does not include any new engineering or design activities.

9.0 PROCUREMENT AND MATERIAL MANAGEMENT

The completion of this project may require the assistance of subcontractors for the performance of mathematical analyses. If needed, approved subcontractors with the appropriate scope are currently available to assist in this work. No specific budget needs have been identified.

10.0 PROJECT CONTROLS

Project progress will be documented by e-mail correspondence to be transmitted to management on a biweekly basis. Completion of tasks assigned to subcontractors, if used, will be formally tracked per requirements identified in the current applicable contract. Informal regular communication with subcontractors will request that input is delivered and progress is documented via e-mail correspondence.

11.0 PROJECT QUALITY PLAN

Because the project is to be wholly implemented within WTS under the CCP program, this PXP element is governed by the overall WTS contract quality assurance (QA) program requirements and the CCP program QA protocols.

12.0 CONSTRUCTION

This PXP element is not applicable to the scope of this project. This project does not include any new construction activities.

13.0 COMMISSIONING AND START-UP

This PXP element is not applicable to the scope of this project. As this project does not include any new engineering, design, or construction activities, commissioning and start-up procedures are not relevant.

14.0 ENVIRONMENT, SAFETY, AND HEALTH

Because the project is to be wholly implemented within WTS under the CCP program, this PXP element is governed by the overall WTS contract protocols (e.g., for client interface and reporting requirements) and current staffing and resources. No unique risks/considerations or safety targets have been identified for this project.

15.0 RISK MANAGEMENT PLAN

The completion date for establishing a stand-alone CCP transportation program is August 31, 2006. This date is established in an effort to complete the project prior to the date of issuance of the final §311/RH permit, which is anticipated in September 2006. While not expected, the permit could potentially be issued sooner. Should the permit be issued prior to the completion of this project, intersite shipments could still be completed under the current protocols for shipment. Intersite shipments within this very short window of time (between potential accelerated approval of the 311/RH permit and completion of this project) are not expected. As such, mitigation of this particular risk is not necessary.

The completion of intersite shipments is highly dependent on the development of acceptable interface between the shipping and receiving sites, the establishment of any required agreements for shipping across state lines, and the completion of any required regulatory activities (e.g., National Environmental Policy Act [NEPA] analysis). While this project establishes the blueprint for intersite shipments, actual implementation will be dictated by DOE-CBFO after resolution of these issues. This risk will be mitigated by working in close alignment with DOE-CBFO regarding these issues and working to DOE-CBFO direction.

16.0 PROJECT CLOSEOUT

Because the project is to be wholly implemented within WTS under the CCP program, this PXP element is governed by the overall WTS contract financial closeout and project completion reporting requirements.

17.0 PROJECT PROCEDURES

As this project involves the evaluation of the CCP transportation program, the current CCP-PO-003 and its implementing procedures are identified as project specific procedures.

17.1 References

1. U.S. Department of Energy. Contact-Handled *Transuranic Waste Authorized Methods for Payload Control (CH-TRAMPAC)*, U.S. Department of Energy, Carlsbad Field Office, Carlsbad, New Mexico.

2. New Mexico Environment Department, Hazardous Waste Facility Permit No. NM 4890139088-TSDF.

3. CCP-PO-003, *CCP Transuranic Authorized Methods For Payload Control (CCP TRAMPAC)*