

WP 04-AD3028

Revision 1

**Storage of Compressed Gas
Cylinders Weekly LCO
Surveillances**

Management Control Procedure

EFFECTIVE DATE: 09/24/10

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APPROVED FOR USE

CONTINUOUS USE

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CHANGE HISTORY SUMMARY

REVISION NUMBER	ISSUED DATE	DESCRIPTION OF CHANGES
1	09/24/10	Added to bullet in Precautions and Limitations to add fall restraints (chain or bar or strap) for compressed gas cylinders in storage.

INTRODUCTION ¹

This procedure provides instructions for performing weekly surveillances associated with **Limiting Conditions of Operation (LCO) 3.6.1**, Storage of Compressed Gas Cylinders, as defined in the Technical Safety Requirements (TSRs).

Performance of this procedure generates the following record(s), as applicable. Any records generated are handled in accordance with departmental Records Inventory and Disposition Schedules.

- EA04AD3001-SR33, Surveillance Data Sheet

REFERENCES

BASELINE DOCUMENTS

- Title 29, *Code of Federal Regulations* (CFR) 1910, "Occupational Safety and Health Standards"
- DOE/WIPP-07-3372, *Waste Isolation Pilot Plant Documented Safety Analysis*
- DOE/WIPP-07-3373, *Waste Isolation Pilot Plant Technical Safety Requirements*
- WIPP-007, Hazards Identification Summary Report for WIPP and Carlsbad, NM
- WP 12-FP.01, WIPP Fire Protection Program
- WP 12-FP3003, Combustible Loading Controls for the Waste Handling Building and Underground
- WP 12-IS.01-2, Industrial Safety Program – Lockout/Tagout and Nonelectrical Energy Hazards

REFERENCED DOCUMENTS

- WP 04-AD3001, Facility Mode Compliance
- EA04AD3001-SR33, Surveillance Data Sheet

PRECAUTIONS AND LIMITATIONS

- The TSRs contain the LCOs and Specific Administrative Controls (SACs) which provide specific preventative or mitigative limits and required actions for identified accident scenarios. Failure to comply with LCOs or SACs may constitute a violation and must be immediately reported to the

Facility Shift Manager (FSM). The step affected by the LCO/SAC is followed by the LCO/SAC number in bold brackets e.g., **[LCO x.x.x]**. Applicable LCO/SAC Surveillance Data Sheets SHALL be completed as required by WP 04-AD3001.

- Failure to complete a surveillance requirement (SR) within its specified frequency SHALL constitute a violation of the associated LCO and must be immediately reported to the FSM.
- The storage of compressed gas cylinders applies at all times and in all PROCESS AREAS as defined by the TSR.
- The PROCESS AREA as defined by the TSR is: the OUTSIDE AREA when < 100 feet from WASTE (Waste in Type B Shipping Containers is exempt from the < 100 foot spacing requirement in the OUTSIDE AREA), the CONTACT-HANDLED (CH) BAY, the REMOTE-HANDLED (RH) BAY, the HOT CELL COMPLEX, the SHAFT ACCESS AREA.
- The WASTE Hoist conveyance, WASTE SHAFT STATION (includes the E-140/S-400 intersection and the portion of the S-400 drift from the E-140/S-400 intersection to the WASTE Shaft), TRANSPORT PATH, and DISPOSAL ROOM(S) as defined by the TSR. The TSR controls for the transport of compressed gas cylinders apply at all times in the UNDERGROUND.
- Compressed gas cylinders which are not designed with caps or guards are not allowed in the PROCESS AREA except where explicitly exempted by the TSR.
- Compressed gas cylinders SHALL be stored in designated storage area when not in use. **[LCO 3.6.1]**
- Compressed gas cylinders in storage SHALL be secured with fall restraints (chain, or bar, or strap). **[LCO 3.6.1]**
- Compressed gas cylinder valve SHALL be closed and valve cap installed or valve protected by a guard. **[LCO 3.6.1]**
- Designated storage areas for non-flammable compressed gas cylinders SHALL be \geq 25 feet from WASTE. **[LCO 3.6.1]**
- Designated storage areas for flammable compressed gas cylinders SHALL be \geq 100 feet from WASTE. **[LCO 3.6.1]**
- Compressed gas cylinders stored \geq 100 feet from WASTE, cylinders used for life safety (e.g., oxygen bottles, self-contained/self-rescuers, and fire extinguishers), and handheld cylinders used for monitoring of volatile

organics are excluded from the requirements of LCO 3.6.1. P-10 gas may be stored < 25 feet from WASTE.

PREREQUISITE ACTIONS

- 1.0 Obtain LCO Surveillance Data Sheet(s), EA04AD3001-SR33, as found in WP 04-AD3001.

PERFORMANCE

NOTE

Compressed gas cylinders used \geq 100 feet from WASTE, cylinders used for life safety (e.g., oxygen bottles, self-contained/self-rescuers, and fire extinguishers), and handheld cylinders used for monitoring of volatile organics are excluded from the requirements of **LCO 3.6.1**, unless specifically identified in this procedure. P-10 gas may be stored < 25 feet from WASTE.

LCO 3.6.1 surveillances apply in all PROCESS AREAS (excluding the above exemptions) and at all times.

- 1.0 STORAGE OF COMPRESSED GAS CYLINDERS LCO 3.6.1 WEEKLY SURVEILLANCES
 - 1.1 FSM/EST/Designee, verify the following weekly:
 - Designated storage areas (for non-flammable compressed gas cylinders) \geq 25 feet from WASTE. **[SR 4.6.1.2]**
 - Compressed gas cylinders in storage areas are secured with fall restraints (chain, or bar, or strap). **[SR 4.6.1.3]**
 - Flammable compressed gas cylinders are stored \geq 100 feet from WASTE. **[SR 4.6.1.5]**
 - 1.2 Complete Surveillance Data Sheet EA04AD3001-SR33 for **LCO 3.6.1**, **SR 4.6.1.2**, **SR 4.6.1.3**, and **SR 4.6.1.5**.
 - 1.3 Forward the completed Surveillance Data Sheet(s) and all associated documentation to the FSM for review and approval.
 - 1.4 FSM, review the Surveillance Data Sheet(s) EA04AD3001-SR33 for compliance with **LCO 3.6.1**, **SR 4.6.1.2**, **SR 4.6.1.3**, and **SR 4.6.1.5**. Complete the Surveillance Data Sheet(s) signature block.