

WP 05-WH1724

Revision 3

RH Hot Cell Complex Key Control

Technical Procedure

EFFECTIVE DATE: 06/24/09

Randy Britain
APPROVED FOR USE

CONTINUOUS USE PROCEDURE

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INTRODUCTION ^{1,2,3,4,5,6}

This procedure provides instructions and guidance to obtain access to the RH Hot Cell Complex. The control of keys to access doors into the RH Hot Cell Complex, where waste may be processed or stored in an unshielded configuration, will be under the direct control of the Facility Shift Manager (FSM).

The following quality records are generated as a result of performing this procedure:

- Attachment 1 - Key Control Log
- Attachment 2 - Quarterly Audit Log

REFERENCES

BASELINE DOCUMENTS

- Title 10 *Code of Federal Regulations* (CFR) Part 835, "Occupational Radiation Protection"
- DOE/WIPP-07-3372, *Waste Isolation Pilot Plant Documented Safety Analysis*
- DOE/WIPP-07-3373, *Waste Isolation Pilot Plant Technical Safety Requirements*
- Hazardous Waste Facility Permit, Waste Isolation Pilot Plant, Permit No. NM4890139088 - TSDf, issued by the New Mexico Environment Department
- DOE-STD-1098-99, Radiological Control
- WP 12-HP1500, Radiological Posting and Access Control
- WP 12-HP3600, Radiological Work Permits

REFERENCED DOCUMENTS

- WP 04-IM1000, Issues Management Program Processing of WIPP Forms
- EA04IM1000-1-0, WIPP Form
- WP 05-WH4401, Waste Handling Operator Event Response
- WP 12-HP4000, Emergency Radiological Control Responses

PRECAUTIONS AND LIMITATIONS

- If this procedure cannot be performed as written or in sequence, Waste Handling Engineer (WHE) shall be contacted.

- Performers of procedure may print name, sign, initial, and place date on Attachment 1 at any time during the performance of this procedure.
- FSM (or designee) and Waste Handling Manager (WHM) shall be notified if any abnormal conditions are found during the performance of this procedure.
- Abnormal events that require the cessation of this procedure, such as a radiological event, must be performed in accordance with WP 05-WH4401 and WP 12-HP4000.
- Attachment 2 must be generated prior to first waste receipt and quarterly thereafter.
- The following RH Hot Cell Complex doors are required to be closed and locked during normal operations, and the rooms/areas must be unoccupied.
 - Hot Cell Cage Door #216
 - Lower Hot Cell Cage Door #154
 - Transfer Cell Door #70
 - Crane Maintenance Room Airlock Door #402
- A Radiological Work Permit (RWP) shall be generated, reviewed, and approved prior to initiating the key checkout process.
- After first receipt of RH waste, entries of any type into one of the controlled areas requires an entry by radiological control personnel prior to the commencement of the activity.
- If entry into the Transfer Cell is required, the RH waste canister must be stored in a RH-TRU 72-B Cask, in the Shielded Insert, or in the Transfer Cell empty (no waste present).
- No entry into the Hot Cell is allowed if there is waste in the Hot Cell.
- If entry into the Lower Hot Cell is required, the Hot Cell must be empty (no waste present).
- If entry into the Crane Maintenance Room is required, the Shield Door must be closed if there is waste in the Upper Hot Cell.
- Keys to the RH Hot Cell Complex Doors requiring control shall be maintained in a lock box under the control of the FSM (or designee) when not in use.
- Checkout of keys to the RH Hot Cell Complex Doors require the approval of the FSM (or designee), RH WHM (or designee), and Radiological Control Manager (RCM) (or designee).

- This procedure may be performed for demonstration or training purposes prior to first RH waste receipt, but is not required to be utilized for entry into the RH Hot Cell Complex until first RH waste receipt.

PREREQUISITE ACTIONS

- 1.0 WHE, verify area to be accessed does not have any RH waste being handled or stored in an unshielded configuration.
- 2.0 [Radiological Control Technician \(RCT\)](#), review approved RWP with RH WHM, RCM, and FSM and initial Attachment 1.⁷

SIGN-OFF RCT

- 3.0 [RCT](#), complete review of RWP with affected personnel and verify all personnel have signed RWP.⁷
- 4.0 WHE, verify adequate Waste Handling (WH) Operations staff is available to support entry activities.
- 5.0 WHE, verify appropriate area of RH WH Building (WHB) is configured for applicable RH WH Mode by contacting Central Monitoring Room Operator (CMRO).

SIGN-OFF WHE

PERFORMANCE

- 1.0 KEY CHECKOUT

NOTE

Transfer of a Controlled Key(s) in the field from one individual to another individual is not permitted.

- 1.1 RCT, complete Attachment 1 at the time of key issuance.

SIGN-OFF RCT

- 1.2 RCM, sign and date Attachment 1, indicating approval for key checkout.

SIGN-OFF RCM

- 1.3 RH WHM, sign and date Attachment 1, indicating approval for key checkout.

SIGN-OFF WHM

1.4 FSM, sign and date Attachment 1, indicating approval for key checkout.

SIGN-OFF FSM

1.5 FSM, issue key to RCT.

1.6 RCT, maintain control of key until completion of job task, or end-of-shift.

1.7 RCT, at completion of job task, or end-of-shift, verify all personnel have exited area.

1.8 RCT, verify affected area is locked.

SIGN-OFF RCT

NOTE

Controlled keys shall be checked in each day.

2.0 KEY RETURN

2.1 RCT, upon completion of job task, or at end-of-shift, return key to FSM.

2.2 RCT, complete key return portion of Attachment 1.

SIGN-OFF RCT

2.3 RCT, submit Attachment 1 to FSM.

2.4 FSM, verify appropriate key has been returned and key return portion of Attachment 1 has been completed properly.

SIGN-OFF FSM

2.5 FSM, place controlled key into key lock box.

2.6 Performers of procedure, enter printed name, signature, initials, and date on Attachment 1.

2.7 FSM, submit completed Attachment 1 to RH WHM.

2.8 WHM, perform the following:

2.8.1 Review Attachment 1 for completeness and sign Review/Validation block.

2.8.2 Submit completed Attachment 1 to Records Coordinator (RC).

3.0 QUARTERLY AUDITS

NOTE

Quarterly key audits should be performed during the last week of the current quarter.

- 3.1 FSM, verify all keys are in the lock box, or properly checked out.
- 3.2 FSM, once all keys are accounted for, enter Quarterly Audit SAT in remarks section of Attachment 2.
- 3.3 FSM, if any deficiencies are discovered, annotate deficiencies in the remarks section on Attachment 2.
- 3.4 FSM, if a key cannot be accounted for, perform the following:
 - 3.4.1 FSM, notify the Operations Manager of key missing.
 - 3.4.2 FSM, if a key cannot be accounted for, **GO TO** WP 04-IM1000, and ensure a WIPP Form (EA04IM1000-1-0) is initiated.
- 3.5 FSM, verify Attachment 2 is completed properly.
- 3.6 FSM, submit completed Attachment 2 Log to RH WHM.
- 3.7 WHM, submit Attachment 2 to RC.

