



Team Product Document

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Distribution			Abstract		
*	Name	Mail Addr.	This document details the radioactive waste management plan for the DOE-site restoration activities, including radioactive low level waste (LLW) and mixed low level waste (MLLW). It also describes the Waste Certification Program Plan (WCPP) for radioactive waste		
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Supporting Document Summary of Change

No. PMP-00003

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Rev.	Summary of Change	Approvals and Date
A	Minor Changes to clarify that this document addresses LLW and MLLW, and refers to PMP-00004 document for TRU and MTRU. Also, corrects wording in Sec. 5.0 to refer to “thirteen documents” instead of “twelve,” corrected Documents 5 and 17 in Appendix A, and added Document 23 to the list.	R. Marshall R. Amar
B	Changed document number EID-06032 in Appendix A list to EID-06037.	R. Marshall R. Amar
C	Changed document title to include “for LLW & MLLW,” added DOE Order O 435.1 and SOP C-100 to Applicable Documents, Sec.2.0, added EID-04758 and QA-00004 to the documents listed in Appendix A, revised Appendix B (Table), and corrected typos.	R. Marshall R. Amar RELEASED 03-05-01 CV
D	Added explicit requirement for formal reviews of applicable revisions to disposal site waste acceptance criteria (Sec. 4.0); added characterization to waste management program description (Sec. 1.0, 4.0, 5.0).	R. Marshall R. Amar
E	Updated Appendix B to incorporate the Crosswalk (NIC) specified in the NTSWAC, Rev. 5.	R. Marshall R. Amar
F	Updated Appendix B (NTS Implementation Crosswalk (NIC)) to incorporate comments from the EID-04482 Para 28.2 specified annual review of the NIC.	R. Marshall R. Amar
G	Deleted Appendix B NTS Implementation Crosswalk (NIC). The NIC will become a stand-alone document (NIC-00001) in the SSFL procedure system. Revised the last paragraph in section 5.0 to identify the new location of the NIC.	S. Gevorgiz
H	Added 1-year storage limit requirement to 4.0; Changed Safety, Health & Environmental Affairs (SHEA) to Environment, Health & Safety (EHS) throughout; Deleted Fig 1; and made other minor editorial type changes.	John Vargo Ravnesch Amar

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1.0 PURPOSE

The purpose of this document is to outline the requirements for waste management activities related to the generation, characterization, storage, and disposal of radioactive low level waste (LLW) and mixed LLW (MLLW) associated with ETEC closure and DOE site restoration. In addition, the Waste Certification Program Plan (WCPP) for radioactive waste is presented. Non-radioactive waste generated at the site will be handled and managed by Environment, Health & Safety (EHS) in accordance with Boeing Santa Susana Field Lab (SSFL) Procedures and is not addressed in this document.

2.0 APPLICABLE DOCUMENTS

1. PMP-00001 "Program Management Plan for ETEC Closure"
2. QA-00001 "Quality Assurance Program Plan for ETEC Closure"
3. Boeing Corporate and SSFL EHS Procedures
4. NTSWAC "Nevada Test Site Waste Acceptance Criteria"
5. HNF-EP-0063 "Hanford Site Solid Waste Acceptance Criteria"
6. Code of Federal Regulations (CFR) Title 49 - "Transportation"
7. Code of Federal Regulations (CFR) Title 10 - "Energy"
8. Code of Federal Regulations (CFR) Title 40 - "Environmental Protection Agency"
9. California Code of Regulations (CCR), Title 22, Sections 66260-66272
10. DOE Order O-435.1

3.0 WASTE MANAGEMENT ACTIVITIES

The ETEC site restoration activities include decontaminating and decommissioning (D&D) of former nuclear facilities, and result in the generation of radioactive waste are described in Applicable Document 1. The waste management activities at the site will consist of storage, treatment, size reduction, characterization, certification, preparation for off-site disposal, and shipment.

The principal radioactive waste materials expected to be generated are contaminated concrete, contaminated metals, principally steel with small amounts of brass, copper, and aluminum, wood, filters (HEPA, pre & bag filters), and soft trash. The radioactive trash will be predominantly PCV plastic sheeting use for contamination control, plastic shoe covers, latex rubber gloves, duct tape, and paper wipes. Other waste materials will include small hardware from the facilities, blasting grit, concrete rubble and blocks, soil, asphalt, gravel, and rocks removed from yard surface, driveways, and building foundations. In addition waste may include large pieces of equipment and/or machinery, such as compressors, motor generators, transformers and etc.

4.0 WASTE MANAGEMENT REQUIREMENTS

Waste shall be generated, characterized, and packaged per specific waste handling procedures that provide the requirements for loading the waste into containers, recording its description and completing the waste inventory documentation. Low level waste (LLW) and mixed low level waste (MLLW) could be generated and managed on-site.

All operations shall be performed by trained personnel, and must be verified or approved by Environment, Health & Safety (EHS) and/or Quality Assurance. Containers could be stored at the job site, or be placed in storage at a limited access storage area, pending shipment. Waste could be transferred to the RMHF for size reduction, additional characterization, and storage prior to shipment. (The RMHF is a RCRA permitted treatment and storage facility).

There will be no on-site disposal of radioactive waste. All of the generated radioactive waste shall be shipped to off-site disposal sites approved by DOE within one year of packaging. Exceptions to the one-year storage limit must be approved by the DOE. The Radioactive Materials Handling Facility (RMHF) Tracking System (RTS) is used to track waste packages and flags those approaching the one-year storage limit. Radioactive waste generated in the past has been shipped to the DOE Nevada Test Site (NTS), the DOE Hanford Site (Hanford), and the Envirocare of Utah Inc. site (Envirocare). MLLW has been shipped primarily to Envirocare, and small amounts have been shipped to other sites.

The waste management program shall include detailed procedures for waste generation, characterization, packaging and shipping, and quality assurance verification. These procedures shall comply with DOE, DOT, EPA, California State, and the disposal sites' waste acceptance criteria (NTSWAC and HNF-EP-0063).

To the extent possible, the disposal sites requirements specified in the sites waste acceptance criteria (WAC) must be addressed in these procedures. In case of conflicting interpretation, missed requirement, or new requirements, the latest revision of site WAC shall govern.

A waste certification program plan (WCPP) designed to certify radioactive waste destined for disposal at any approved site shall be developed and shall address all the above requirements.

Formal reviews shall be performed and documented for any applicable revisions to disposal site waste acceptance criteria.

5.0 WASTE CERTIFICATION PROGRAM PLAN (WCPP)

This section describes the WCPP developed to comply with the requirements outlined in Section 4.0. The WCPP combines existing Boeing procedures and documents with SSFL implementing operating procedures. Essentially, the WCPP is comprised of the documents listed in Appendix A.

The “Program Management Plan”, (PMP-00001), Document 1, is the top level document, defining plans, organization, and controls for compliance with the DOE contract for ETEC closure. Document 2, (PMP-00003 - this document), describes the radioactive waste management plan and the WCPP.

Document 3 (QA-00001), the Quality Assurance Program Plan, defines the QA Program Plan (QAPP) for the ETEC closure. The criterion of the Code of Federal Regulations 10 CFR 830 Subpart A, *Quality Assurance Requirements*, and DOE Order 414.1C, *Quality Assurance*, are achieved through the application of ASME NQA-1-2004 w/addenda through 2007, Quality Assurance Requirements for Nuclear Facility Applications, as the basis for the Quality Assurance Program.

The other documents listed in Appendix A, cover the various aspects of waste generation, characterization, inspection, radioactive surveillance, characterization, sampling and analysis, waste minimization, shipment, transportation, and training.

As required by the NTSWAC a NTS Implementation Crosswalk (NIC) was developed to provide cross check between the NTSWAC basic requirements and the Boeing implementing documents. The NIC can be accessed in the SSFL procedure system. Reference document number NIC-00001.

6.0 WASTE CERTIFICATION OFFICIAL

A position of Waste Certification Official (WCO) has been established in order to comply with NTSWAC Requirement 5.1. The WCO has the responsibility of verifying the implementation of the WCPP described in this document to all activities associated with radioactive waste disposal at NTS or other approved sites. The WCO responsibilities are outlined in Document 8 (see App. A).

APPENDIX A

Waste Certification Program Plan (WCPP) & Waste Management Documents List

Waste Certification Program Plan (WCPP) Documents:

1. PMP-00001 Program Management Plan for ETEC Closure
2. PMP-00003 Radioactive Waste Management Plan for LLW & MLLW
3. QA-00001 Quality Assurance Program Plan for ETEC Closure
4. QA-00002 Quality Assurance Inspection Requirements for Radioactive Shipments
5. RPA-00091 Closure of ETEC Release Plan of Action
6. EID-04450 DOE-Site Restoration Training Plan
7. EID-04360 Sampling Procedure for Containerized Materials
8. EID-04482 Packaging and Shipment of Radioactive Waste
9. EID-04486 Procedure for Using the RMHF Tracking System (RTS)
10. EID-04487 Sampling and Analysis Plan for Radioactive Waste
11. EID-04489 Waste Containers Specification
12. RS- 00011 Procedures for Surveys of Radioactive Shipments
13. RS- 00012 Methods and Procedures for Radiological Monitoring

Waste Management Documents:

1. EID-04446 Process Hazard Analysis Document for the Radioactive Materials Handling Facility (RMHF)
2. EID-04451 On-Site Radioactive Materials Transfer Plan
3. EID-04488 Waste Minimization and Pollution Prevention Awareness Plan
4. EID-04493 Procedure for Packaging and Shipping of Radioactive Materials
5. EID-04494 RMHF Radioactive Materials Management and Waste Acceptance Criteria
6. EID-04495 Qualification and Shipment of LLW to Envirocare
7. EID-04758 Waste Certification Plan (WCP) for ETEC Facilities
8. EID-06146 Guidelines for Performing Process Hazards Analyses for Closure of ETEC
9. QA-00004 ETEC Closure Program Surveillance

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