Verify and Repackage Waste Stored in Drums

Tank Farm Plant Operating Procedure

Effluent Treatment Facility

USQ Not Required - ETF is a <Hazard Category 3 Radiological Facility

Changes “Other Than Inconsequential” Require These Additional Reviews:

ETF Waste Management

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1.0 PURPOSE AND SCOPE

1.1 Purpose

This procedure provides instructions for verification and repackaging of waste stored in drums at the ETF.

1.2 Scope

This procedure involves ensuring drums containing mixed waste, low-level waste, or hazardous waste will be opened and the contents visually examined and repackaged.

2.0 INFORMATION

2.1 General Information

2.1.1 If an item is removed from a container with contamination levels greater than RWP Safe Conditions, stop work and contact operation and radiological control management.

2.1.2 HPT survey is required when the following conditions are met:

- During initial breaching of any container containing radioactive material
- While working within any container containing radioactive material
- During sampling or monitoring activities with radioactive material
- When removing materials from any posted radiological area requiring a survey.
3.0 PRECAUTIONS AND LIMITATIONS

3.1 Personnel Safety

WARNING - Gas generation from radiolytic or biological decomposition may result in pressurization and the presence of combustible gas in waste containers that may cause injury to personnel.

3.1.1 Non-sparking tools should be used as drums may contain combustible gas.

3.2 Radiation and Contamination Control

3.2.1 Work in radiological areas will be performed using a radiological work permit following review by Radiological Control per ALARA Work Planning procedure, TFC-ESHQ-RP_RWP-C-03.

3.3 Environmental Compliance

3.3.1 In the event of a spill/leak/release, notify the SOM/FWS and respond per ETF-ERP-85B-003, Emergency Spill or Release at ETF.
4.0 PREREQUISITES

4.1 Special Tools, Equipment, and Supplies

The following supplies may be needed to perform this procedure:

- Tape
- Plastic bags
- Decontamination supplies
- Evidence tape
- Photographic equipment
- Plastic and paper sheeting
- Rubber mallet
- Drum dolly
- Non-sparking tools, for drum opening
- Permanent black marking pen
- Drum Lid Restraining Device
- Band strap cutter
- Steel-toed boots.
4.2 Field Preparations

4.2.1 CONFIRM HPT has approved the radiological area where verification/repackaging will be performed.

4.2.2 IF pallets are used for filling drum storage, INSPECT for the following:
- Cracks
- Tears
- Breaks
- Gouges
- Deformities.

4.2.3 CONFIRM filled drum storage pallets are inspected before use.

4.2.4 ENSURE the Drum Lid Restraining Device is within the periodic inspection dates as specified on the Periodic Inspection Tag.

4.2.5 IF pallet is damaged, REMOVE from service AND DISPOSE of appropriately.

4.2.6 REQUEST IH assistance when opening drums to review contents of waste containers.
5.0 PROCEDURE

Special Instructions

Sections of this procedure may be performed in any logical order, or in parallel.

5.1 Opening Drums

5.1.1 INSPECT drums for the following visible signs of pressurization:
   • Bulging
   • Corrosion.

5.1.2 IF a bulging drum is identified, NOTIFY SOM.

5.1.2.1 Proceed as directed by SOM.

5.1.3 IF palletized, OBSERVE visible portion of pallet to ensure it is intact prior to moving.

5.1.4 MOVE drums to proper staging location.

5.1.5 INSPECT lid restraining device prior to use for any evidence of the following:
   • Frayed edges
   • Exposed fibers
   • Excessively worn rubber
   • Defective ratchet assembly.

5.1.6 CHECK webbing for any evidence of the following deterioration:
   • Fading
   • Cracking
   • Discoloration
   • Stretched or fatigued fibers.
5.1 Opening Drums (Cont.)

5.1.7 ATTACH lid restraining device to drum as follows:

5.1.7.1 PLACE drum lid restraining device over drum ensuring the following:

- Ratchet backplate is facing drum
- Ratchet is not directly in front of lid bolt ring or below operator when drum is opened.

5.1.7.2 CONFIRM there are no twists in webbing.

5.1.7.3 POSITION ratchet band approximately one inch below rolling ring.

NOTE - Webbing will stretch a small amount as it is tightened.

5.1.7.4 FEED loose end of ratchet band through ratchet spool AND TIGHTEN about two wraps around web spool.

5.1.7.5 ENSURE ratchet band cannot be easily moved vertically or horizontally.

5.1.7.6 OPERATE ratchet handle to fully CLOSED to engage ratchet safety lock.

5.1.8 ENSURE work area is clear of unnecessary personnel.

5.1.9 STAY clear of container top.

5.1.10 WHEN first loosening fasteners on container look for any movement indicating the container may be pressurized.

5.1.11 IF any signs of pressurization, CONTACT SOM to determine if work should continue.

WARNING

Gas generation from radiolytic or biological decomposition may result in pressurization and the presence of combustible gas in waste containers that may cause injury to personnel.
5.1 Opening Drums (Cont.)

5.1.12 REMOVE bolt and locking ring.

5.1.13 REQUEST HPT perform removable contamination survey around sealing surface.

5.1.14 SLIGHTLY OPEN drum lid.

5.1.15 REQUEST HPT perform removable contamination survey of drum lid and dose rate survey of container contents.

5.1.16 REMOVE lid restraining device and lid.

5.1.17 PLACE lid where it does not create a tripping hazard.

5.1.18 IF waste needs to be repackaged, GO TO Section 5.2.
5.2 Repackaging Waste

5.2.1 PLACE paper or plastic sheeting over floor where repackaging will take place.

5.2.2 REMOVE packing material around inner containers to enable removal of inner packages.

5.2.3 REQUEST HPT perform contamination and dose-rate survey.

5.2.4 INSPECT for any bulging of inner packages.

5.2.5 IF any bulging packages are encountered, CONTACT SOM and IH.

5.2.5.1 PROCEED as directed by SOM.

5.2.6 INSPECT for contents that could puncture, rip, cut or otherwise injure or harm personnel.

5.2.7 OPEN plastic bag to examine contents.

5.2.8 REQUEST HPT perform contamination survey.

5.2.9 PLACE inner packages on paper or plastic sheeting as removed from container.

5.2.10 REPACKAGE waste into new or original container using original packaging material (e.g., void filler) in accordance with ETF-65D-003, Package Waste.

5.2.11 FILL any additional void space with approved void filler.

5.2.12 RECORD weight of additional void fill on inventory sheet.

5.2.13 CLOSE container in accordance with facility waste packaging procedure.

5.2.14 REQUEST HPT perform contamination and dose-rate survey AND ATTACH appropriate radioactive label.

5.2.15 TRANSFER drum to appropriate waste storage area AND UPDATE Waste Container Logbook and Solid Waste Information Tracking System, as applicable.
5.3 Records

5.3.1 **PERFORM** the following for records identified within this procedure.

5.3.1.1 **RECORD** the number of times the record was generated in applicable column

**OR**

**PLACE** a check mark (✓) in the N/A column.

5.3.1.2 **SUBMIT** the package for verification of completed records.

<table>
<thead>
<tr>
<th>Records Submittal Checklist</th>
<th>Number of times completed</th>
<th>N/A (✓)</th>
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<tr>
<td><strong>Forms</strong></td>
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<tr>
<td>A-6002-936, Tank Farm Waste Inventory Sheet</td>
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<td>FWS/OE/Shift Manager <strong>SEND</strong> the completed records to the Central Shift Office for records retention.</td>
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<td>___________________________/ _________________________ / __________________</td>
<td>Print (First &amp; Last)</td>
<td>Date</td>
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<td>FWS/OE/Shift Manager</td>
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The record custodian identified in the Company Level Record Inventory and Disposition Schedule (RIDS) is responsible for record retention in accordance with TFC-BSM-IRM_DC-C-02.