TSR Compliance

Inspect Waste Pad Areas and Active Containers

Tank Farm Plant Operating Procedure

BURIAL AND WASTE

USQ # TF-17-0899-D, Rev. 1

CHANGE HISTORY (≤ LAST 5 REV-MODS)

<table>
<thead>
<tr>
<th>Rev-Mod</th>
<th>Release Date</th>
<th>Justification</th>
<th>Summary of Changes</th>
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<tr>
<td>M-4</td>
<td>01/25/2018</td>
<td>WRPS-PER-2017-2145.9</td>
<td>In Scope section show flowdown of requirements documents. Update terms and definitions to match training of personnel. Remove references to RMA-230 and RMA-187 that are in Checklist 1. Editorial edits.</td>
</tr>
<tr>
<td>M-3</td>
<td>10/17/2017</td>
<td>PCA generated from Periodic Review</td>
<td>Editorial changes to adhere to current standards and Checklist 1, item 19: changed RMA-230 to WRPS-RMA-060. New line item 20, also, to reflect the wording in step 5.2.5.</td>
</tr>
<tr>
<td>M-2</td>
<td>07/19/2017</td>
<td>Operations request to match record keeping requirements</td>
<td>Clarification on inspection of Universal Waste. Change in RMA numbers on inspection sheet. Updated start date for Universal Waste Containers in Section 5.2. Upgraded the RECORDS section. Modified Checklist 1 column headings.</td>
</tr>
<tr>
<td>M-1</td>
<td>08/17/2016</td>
<td>Operations request to provide better flow.</td>
<td>P. 7 - Moved Step 5.2.6.4 to 5.2.5. Reason: Operation request to correct error.</td>
</tr>
<tr>
<td>M-0</td>
<td>03/31/2016</td>
<td>Periodic review comment resolution</td>
<td>In general: Replaced Radcon Statement. Added HAZ waste references throughout. Added 616 Inspection Checklist and new Step 5.2.3. Added new Step 5.2.5.4 to notify FLM if 20 or more radioactive waste containers are in the RMA. Clarified Step 5.3.2. Expanded Step 5.4.4 by adding two sub-steps. Added new Step 5.4.8 to sign and date Inspection Sheet. Further clarified Step 5.5.2. In Checklist 1, Modified to clarify objective.</td>
</tr>
</tbody>
</table>

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Type | Document No. | Rev/Mod | Release Date | Page |
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<td>TO-100-045</td>
<td>M-4</td>
<td>01/25/2018</td>
<td>1 of 19</td>
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</tbody>
</table>
Inspect Waste Pad Areas and Active Containers

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1.0 PURPOSE AND SCOPE

1.1 Purpose

This procedure provides instructions for the following tasks:
- Inspections of waste accumulation areas
- Inspections of active waste containers.

1.2 Scope

This procedure applies to all Waste Accumulation Areas, Active Waste Containers, and Waste Accumulation Packages located in Tank Farm facilities.

This procedure implements WAC-173-303 and DOE O 435.1 waste accumulation and storage requirements as defined in TFC-PLN-33, Waste Management Basis.

2.0 INFORMATION

2.1 Terms and definitions

- Active container - any container that has been issued a package identification number (PIN) for accumulation of radioactive mixed waste or hazardous/dangerous waste. Active containers do not include those that have been shipped for disposal.
3.0 PRECAUTIONS AND LIMITATIONS

3.1 Personnel Safety

3.1.1 A communication device (portable two-way radio, telephone) capable of summoning emergency assistance is required to be readily available at all times while personnel are on the pad area.

3.2 Radiation and Contamination Control

When this procedure is worked in radiological areas, an approved radiological work permit (RWP) is required. If radiological conditions or work performed falls outside the scope of the RWP, all work activities must be discontinued until a new or revised RWP has been issued in accordance with TFC-ESHQ-RP_RWP-C-03.

3.3 Environmental

3.3.1 In the event of a spill or release to the environment, the Shift Manager must be notified. The Shift Manager will make appropriate notifications to Environmental personnel.

3.3.2 Spills or releases regardless of the quantity of the hazardous substance, hazardous materials, dangerous/hazardous waste, mixed waste, and radioactive waste must be reported to Environmental per on call list so that it may be reported in accordance with TFC-ESHQ-ENV_FS-C-01.

3.4 Limits

HNF-SD-WM-TSR-006, Tank Farms Technical Safety Requirements

SAC 5.8.4 Low-level Radioactive, Mixed, and TRU Waste Packing Flammable Gas Controls.

RPP-CALC-42233, Evaluation of Flammable Gas Accumulation and Pressure Buildup in Non-Vented Temporary Accumulation Waste Containers at WRPS.

DOE O 435.1, “Radioactive Waste Management.”


42 USC 13106, “Source Reduction and Recycling Data Collection.”
4.0 PREREQUISITES

NOTE - Selection of supplies is dependent on the work being performed. The following list includes supplies needed for a variety of work.

4.1 Special Tools, Equipment, and Supplies

The following supplies may be needed to perform this procedure:

- Active Container Inspection Data Sheets from SWITS
- 616, LLW, MW and Tank Farm Active Container in the field report
- Farm and shed keys, as needed
- Inspection checklist for waste accumulation areas
- A two-way radio, cellular telephone, or mounted emergency telephone
- Black ink permanent marker, fine point
- Other hand-held tools, as needed
- Radioactive Material Tags or Stickers
- Environmental Protection Agency (EPA) Hazardous Waste Labels
- Major Risk labels
- Two-inch green cloth tape
- Plastic bags.

4.2 Performance Documents

The following document may be needed to perform this procedure:

- TO-100-010, Waste Container Operations
- TO-100-052, Perform Waste Generation, Segregation Accumulation and Clean-up
- Package Deficiency Report A-6003-649
5.0 PROCEDURE

NOTE - Tasks in this procedure performed by Operations and Health Physics personnel may be performed concurrently as long as all the steps are completed.

5.1 Reporting Spills

5.1.1 IMMEDIATELY REPORT all spills and leaks of hazardous waste or hazardous materials to Shift Manager and Supervisor.

5.1.2 IMPLEMENT SWIM.

5.2 Inspect 616 Waste Pads

NOTE - Inspections are required weekly.

5.2.1 OBTAIN Checklist 1 - 616 Inspection Checklist, 616, LLW, HAZ, and MW pad report.

5.2.2 INSPECT the following low-level, hazardous, and mixed waste containers:

(SAC 5.8.4)

- DOT Specification IP1 (excluding roll-off type boxes with tarp covers),
- IP2 or Type A.

5.2.3 INSPECT waste pad and containers for deficiencies or for defects AND COMPLETE Checklist 1 - 616 Inspection Checklist.

5.2.3.1 CONFIRM accumulation date on container for Mixed Waste and Hazardous Waste containers AND

CONFIRM by using the 616, Hazardous Waste and MW pad reports.

5.2.3.2 CONFIRM accumulation date for LLW containers using the 616 LLW pad report AND

IMMEDIATELY NOTIFY FLM of any LLW container accumulation date older than 300 days or any HAZ and MW container accumulation date older than 85 days.

5.2.3.3 INSPECT the start date for Universal Waste Containers AND

NOTIFY FLM of any Universal Waste start date greater than 270 days.
5.2 Inspect 616 Waste Pads (Cont.)

NOTE - Recycle waste containers are exempt from the LLW >300 days accumulation.

5.2.4 IF no active packages exist, RECORD “no active packages” on Checklist 1 - 616 Inspection Checklist.

5.2.5 NOTIFY FLM if 20 or more radioactive waste containers are in the RMA inside the 616 facility building.

5.2.6 IF any abnormal conditions exist, PERFORM the following:

5.2.6.1 PERFORM corrective actions,

OR

NOTIFY FLM.

5.2.6.2 RECORD a written description of the condition found.

5.2.6.3 RECORD corrective actions taken in the Comments and Corrective Actions section of Checklist 1 - 616 Inspection Checklist.

5.2.7 COMPLETE Checklist 1 - 616 Inspection Checklist AND DELIVER to FLM/Lead for final review.

5.2.8 REPEAT Steps 5.2.2 through 5.2.6 for each one of the pads.
5.3 Perform Weekly Inspection of Active SAA Containers

5.3.1 IF not already obtained, **OBTAIN** current SWITS Active Container Inspection Sheet. (See Table 1 - Active Container Inspection Sheet for example.) **AND**

**USE** Attachment 2 - SWITS Active Container Inspection Terms for definitions.

NOTE - Only containers that accumulate radioactive waste are required to have vents.

5.3.2 IF container is a radioactive waste Satellite Accumulation Area drum, **ENSURE** NUCFIL vent on SAA MW container is intact and present. *(SAC 5.8.4)*

5.3.2.1 IF NUCFIL is not present, **NOTIFY** WTS Manager.

5.3.2.2 **RECORD** inspection on Table 1 - Active Container Inspection Sheet.

5.3.3 **CHECK** the Inventory Sheet for additions and/or prohibited items per TO-100-052.

5.3.4 IF any deficiencies are found during the inspection, **RECORD** them along with any corrective actions taken by the generator, on the Active Container Inspection Sheet. (See Table 1 - Active Container Inspection Sheet.)

5.3.5 **RECORD** the discovery and contacting the generator on the Active Container Inspection Sheet. (See Table 1 - Active Container Inspection Sheet.)

5.3.6 **COMPLETE** the inspection.

5.3.7 IF the Satellite Accumulation Area (SAA) is in need of housekeeping, **RECORD** on inspection sheet.

5.3.8 **SUBMIT** completed inspection sheets to FLM/Lead or delegate for review and signature.
5.4 Perform Weekly Inspections of Active 90-Day Containers

5.4.1 OBTAIN current SWITS Active Container Inspection Sheet AND USE Attachment 2 - SWITS Active Container Inspection Terms for definitions.

5.4.2 CONFIRM MW containers are < 85 days.

5.4.3 IF MW container is ≥ 85 days, PERFORM the following:

5.4.3.1 IMMEDIATELY NOTIFY the FLM.

5.4.3.2 RECORD comment on SWITS Active Container Inspection Sheet.

NOTE - All active less than 90-day containers will be inspected weekly, no exceptions are allowed.

5.4.4 IF active less than 90-day containers are not accessible, REQUEST generator to verify container status.

5.4.4.1 LIST name and phone number of generator contacted to verify container status on inspection sheet.

5.4.4.2 RECORD date and time generator contacted and verified container status on inspection sheet.

NOTE - Steps 5.4.5 through 5.4.9 may be performed at any time during this section.

5.4.5 IF any container in the field is not listed, ADD it to Inspection Sheet.

5.4.6 IF any deficiencies are found during inspection, RECORD the deficiencies along with any corrective actions taken on Active Container Inspection Sheet. (See Table 1 - Active Container Inspection Sheet for example.)

5.4.7 COMPLETE inspection.

5.4.8 SIGN AND DATE the Active Container Inspection Sheet once all containers on that individual sheet is inspected.

5.4.9 SUBMIT complete inspection sheet to FLM or their delegate for review and signature.
5.5 Perform Monthly Verification of LLW Containers

5.5.1 **OBTAIN** current Tank Farm Waste Containers in the field report.

5.5.2 **CONFIRM** LLW containers are “less than” (<) 300 days by “Age” column.

5.5.3 **IF** LLW container is “greater than or equal to” (≥) 300 days, **PERFORM** the following:

5.5.3.1 **IMMEDIATELY NOTIFY** the FLM.

5.5.3.2 **RECORD** comment on Tank Farm Waste Container in the field report.

5.5.4 **SUBMIT** completed Tank Farm Waste Containers in the field report to FLM or delegate for review and signature.

5.6 Reporting and Resolving Deficiencies

5.6.1 **INFORM** FLM and waste generator of the deficiency AND **REQUEST** correction.

5.7 Resolving Unvented SAA Containers and Containers Close to Gas Generation Time Limits

5.7.1 **UPON** discovering a waste container is 350 days for LLW and 85 Days for MW, **IMMEDIATELY NOTIFY** the Waste Technical Services manager or designees to take actions per Attachment 1 – Considerations for Resolving Unvented SAA containers and Containers Close to Gas Generation Time Limits. (SAC 5.8.4)
5.8 Document Retention

NOTE - WTS organization is responsible for record retention and retirement in accordance with TFC-BSM-IRM_DC-C-02.

- Active Container Inspection Sheet (see Table 1 - Active Container Inspection Sheet for example)
- Checklist - Inspection Checklist.

- General record keeping practices must include entries, which are clearly and neatly written in English using black ink, mistakes or deletions are one lined, initialed, and dated.

5.8.1 STORE waste management documents per TFC-BSM-IRM_DC-C-02 for records retention.
5.9 Records

NOTE - The following records are generated during the performance of this procedure.

5.9.1 FLM Reviews and Authenticates Checklist 1 - 616 Inspection Checklist then submits to Records custodian.

5.9.2 FLM Delivers Reviewed Table 1 - Active Container Inspection Sheet to Waste Engineer for review and authentication then Waste Engineer submits to Records custodian.

The record custodian identified in the Company Level Records Inventory and Disposition Schedule (RIDS) is responsible for record retention in accordance with TFC-BSM-IRM_DC-C-02.
### TSR Compliance

**Inspect Waste Pad Areas and Active Containers**

#### Checklist 1 - 616 Inspection Checklist

Any “No” answers must be explained on the comments section below and a corrective action documented on this form with inspector signature and date.

<table>
<thead>
<tr>
<th></th>
<th>Non-Reg Pad</th>
<th>Recycle Pad</th>
<th>Universal Waste Accum Area / Pad</th>
<th>Radioactive LLW Pad</th>
<th>&lt; 90-Day Accum Pad Hazardous</th>
<th>&lt; 90-Day Accum Pad Mixed (inside) WRPS-RMA-060</th>
<th>&lt; 90-Day Accum Pad Mixed (outside) WRPS-RMA-059</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Area free of combustible materials? (e.g., trash, paper, tumble weeds)</td>
<td>[ ] Yes [ ] No</td>
<td>[ ] Yes [ ] No</td>
<td>[ ] Yes [ ] No</td>
<td>[ ] Yes [ ] No</td>
<td>[ ] Yes [ ] No</td>
<td>[ ] Yes [ ] No</td>
</tr>
<tr>
<td>2</td>
<td>Fences, gates, locks and other closure mechanism in good working condition?</td>
<td>[ ] Yes [ ] No</td>
<td>[ ] Yes [ ] No</td>
<td>[ ] Yes [ ] No</td>
<td>[ ] Yes [ ] No</td>
<td>[ ] Yes [ ] No</td>
<td>[ ] Yes [ ] No</td>
</tr>
<tr>
<td>3</td>
<td>Entrance to 90 – day Accumulation Pad has legible “90 Day Accumulation Area” signage that is legible from ≥ 25 feet?</td>
<td>[ ] Yes [ ] No</td>
<td>[ ] Yes [ ] No</td>
<td>[ ] Yes [ ] No</td>
<td>[ ] Yes [ ] No</td>
<td>[ ] Yes [ ] No</td>
<td>[ ] Yes [ ] No</td>
</tr>
<tr>
<td>4</td>
<td>Facility Emergency Communication device operable? (Telephone or access to a PAX System.)</td>
<td>[ ] Yes [ ] No</td>
<td>[ ] Yes [ ] No</td>
<td>[ ] Yes [ ] No</td>
<td>[ ] Yes [ ] No</td>
<td>[ ] Yes [ ] No</td>
<td>[ ] Yes [ ] No</td>
</tr>
<tr>
<td>5</td>
<td>Containers staged in a manner to ensure they will not tip, fall over, puncture or leak?</td>
<td>[ ] Yes [ ] No</td>
<td>[ ] Yes [ ] No</td>
<td>[ ] Yes [ ] No</td>
<td>[ ] Yes [ ] No</td>
<td>[ ] Yes [ ] No</td>
<td>[ ] Yes [ ] No</td>
</tr>
<tr>
<td>6</td>
<td>Clear and unobstructed aisle between containers? (30 inch minimum space between rows and rows no greater than two drums wide.)</td>
<td>[ ] Yes [ ] No</td>
<td>[ ] Yes [ ] No</td>
<td>[ ] Yes [ ] No</td>
<td>[ ] Yes [ ] No</td>
<td>[ ] Yes [ ] No</td>
<td>[ ] Yes [ ] No</td>
</tr>
<tr>
<td>7</td>
<td>Containers closed? (Closed means contents will not spill out if tipped over.)</td>
<td>[ ] Yes [ ] No</td>
<td>[ ] Yes [ ] No</td>
<td>[ ] Yes [ ] No</td>
<td>[ ] Yes [ ] No</td>
<td>[ ] Yes [ ] No</td>
<td>[ ] Yes [ ] No</td>
</tr>
<tr>
<td>8</td>
<td>Containers in good condition? (Free of punctures, dents, loose lids, corrosion, deterioration, leaks, and bulging.)</td>
<td>[ ] Yes [ ] No</td>
<td>[ ] Yes [ ] No</td>
<td>[ ] Yes [ ] No</td>
<td>[ ] Yes [ ] No</td>
<td>[ ] Yes [ ] No</td>
<td>[ ] Yes [ ] No</td>
</tr>
<tr>
<td>9</td>
<td>Each container marked with all required markings and labels including PIN, gross weight, recyclable or non-reg sticker/label or Universal Waste sticker.</td>
<td>[ ] Yes [ ] No</td>
<td>[ ] Yes [ ] No</td>
<td>[ ] Yes [ ] No</td>
<td>[ ] Yes [ ] No</td>
<td>[ ] Yes [ ] No</td>
<td>[ ] Yes [ ] No</td>
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## Checklist 1 - 616 Inspection Checklist

Any “No” answers must be explained on the comments section below and a corrective action documented on this form.

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<th>Non-Reg Pad</th>
<th>Recycle Pad</th>
<th>Universal Waste Accum Area / Pad</th>
<th>Radioactive LLW Pad</th>
<th>&lt; 90-Day Accum Pad Hazardous</th>
<th>&lt; 90-Day Accum Pad Mixed (inside) WRPS-RMA-060</th>
<th>&lt; 90-Day Accum Pad Mixed (outside) WRPS-RMA-059</th>
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<td>10</td>
<td>[ ] Yes</td>
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<td>[ ] No</td>
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<td>[ ] Yes</td>
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<td>12</td>
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<td>[ ] Yes</td>
<td>[ ] No</td>
<td>[ ] Yes</td>
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<td>13</td>
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<td>[ ] Yes</td>
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<td>[ ] No</td>
<td>[ ] Yes</td>
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<td>[ ] No</td>
<td>[ ] Yes</td>
<td>[ ] No</td>
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<td>16</td>
<td>[ ] Yes</td>
<td>[ ] Yes</td>
<td>[ ] No</td>
<td>[ ] Yes</td>
<td>[ ] No</td>
<td>[ ] Yes</td>
<td>[ ] No</td>
</tr>
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### Inspect Waste Pad Areas and Active Containers

#### Checklist 1 - 616 Inspection Checklist

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<th>Radioactive LLW Pad</th>
<th>&lt; 90-Day Accum Pad Hazardous</th>
<th>&lt; 90-Day Accum Pad Mixed (inside)</th>
<th>&lt; 90-Day Accum Pad Mixed (outside)</th>
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</thead>
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<td>17</td>
<td>Verify HAZ and MW container accumulation date less than 85 days.</td>
<td></td>
<td></td>
<td></td>
<td>[ ] Yes</td>
<td>[ ] No</td>
<td>[ ] Yes</td>
</tr>
<tr>
<td>18</td>
<td>Verify Universal Waste First In or start date less than 270 days.</td>
<td></td>
<td></td>
<td></td>
<td>[ ] Yes</td>
<td>[ ] No</td>
<td>[ ] Yes</td>
</tr>
<tr>
<td>19</td>
<td>Verify Safety Shower/eyewash Inspections is current. (Safety Shower for all areas located inside bay that contains WRPS-RMA-060)</td>
<td>[ ] Yes</td>
<td>[ ] Yes</td>
<td>[ ] Yes</td>
<td>[ ] No</td>
<td>[ ] Yes</td>
<td></td>
</tr>
<tr>
<td>20</td>
<td>Verify Less than 20 radioactive containers in the RMA inside the 616 facility building</td>
<td></td>
<td></td>
<td></td>
<td>[ ] Yes</td>
<td>[ ] No</td>
<td>[ ] Yes</td>
</tr>
</tbody>
</table>

**Comments:**

**Corrective Action(s):** (Includes repairs or remedial actions)

Note: Each Corrective Action must be signed and dated by Inspector.

<table>
<thead>
<tr>
<th>Inspector (Sign)</th>
<th>Inspector (Print first and last)</th>
<th>Date:</th>
<th>Time:</th>
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<tr>
<td>Inspector (Sign)</td>
<td>Inspector (Print first and last)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Supervisor (Sign)</td>
<td>Supervisor (Print first and last)</td>
<td></td>
<td>Date:</td>
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</tbody>
</table>
## TSR Compliance

### Inspect Waste Pad Areas and Active Containers

### Table 1 - Active Container Inspection Sheet

<table>
<thead>
<tr>
<th>Container ID</th>
<th>Location Detail</th>
<th>Danger</th>
<th>Waste Type</th>
<th>Accum. Date</th>
<th>Container Size</th>
<th>(1) Waste Label Y/N</th>
<th>SAA Label Y/N/NA</th>
<th>Major Risk Label Y/N/NA</th>
<th>Rad. Mat. Label Y/N/NA</th>
<th>Container in good condition Y/N</th>
<th>Inventory Sheets Y/N</th>
<th>Container is elevated Y/N/NA</th>
<th>Container on spill pallet or secondary containment Y/N/NA</th>
<th>Container Closed Y/N/NA</th>
<th>90 day Accum. container label Y/N/NA</th>
<th>90 day Accum. container label established Y/N/NA</th>
<th>Any Prohib Items Y/N/NA</th>
<th>SAA signage and area established Y/N/NA</th>
<th>(2) Nuc. Fil. Y/N/NA</th>
</tr>
</thead>
</table>


**NOTE** - (2) Mixed Waste SAA Only.

---

**Deficiency:**

**Correction Action**

Action Corrected By: Sign: ___________________________ Print (first and last): ___________________________ Date: ________________

**Housekeeping Comments:**

Inspector: Sign: ___________________________ Print (first and last): ___________________________ Date: ________________

First Line Manager: Sign: ___________________________ Print (first and last): ___________________________ Date: ________________

Waste Technical Services Oversight: Sign: ___________________________ Print (first and last): ___________________________ Date: ________________

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### Table 2 - Waste Segregation

For additional guidance, CONTACT WTS.

<table>
<thead>
<tr>
<th>Class or Division</th>
<th>Notes</th>
<th>2.1</th>
<th>2.2</th>
<th>2.3 Gas Zone A</th>
<th>2.3 Gas Zone B</th>
<th>3</th>
<th>4.1</th>
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<th>4.3</th>
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Blank Space = No Restrictions
X = Materials may not be loaded or transported together in the same vehicle. Materials may not be stored together in the same room.
O = Materials may be loaded, transported, and stored together but must be separated so that comingling of materials will not occur.
Inspect Waste Pad Areas and Active Containers

Attachment 1 – Considerations for Resolving Unvented SAA containers and Containers Close to Gas Generation Time Limits

1. Determine if the container will ship to a TSD within the remaining time days (15 days for LLW and 5 for MW).
2. If the container ships within that amount of time, no further action is necessary.
3. If the container will not ship within 15 days for LLW and five days for MW one of the following options will be taken:

**OPTION A**

- The WTS Manager will notify the Waste Operations Group of the ID of the container and the need for venting by the deadline. *(SAC 5.8.4)*
- The container will be vented by installation of a NUCFIL Filter per TO-100-010
- Once vented, the gas generation clock reverts to zero and the time limit will continue to be monitored to the new time limit
- A record of the actions taken will be placed in the PIN file of the container.

**OPTION B**

- The WTS Manager will notify the Waste Operations Group of the ID of the container and the need for venting by the deadline. *(SAC 5.8.4)*
- An evaluation by Waste Technical Services for gas generation to determine if the atmosphere in the waste container will remain below one half the time calculated for the hydrogen concentration in the waste package to reach 5% by volume *(RPP-CALC-42233)*
- If the atmosphere in the container will reach one half the time calculated for the hydrogen concentration in the waste package to reach 5% by volume, then the container will be vented *(RPP-CALC-42233)*
- Results of the evaluation will determine the new date limit for gas accumulation
- A record of the actions taken will be placed in the PIN file of the container.
Inspect Waste Pad Areas and Active Containers

Attachment 2 - SWITS Active Container Inspection Terms

[1] Container in good condition: free of punctures, dents, corrosion (small amount of surface rust is acceptable), deterioration, leaks, and bulging.

[2] Container is elevated: to protect from degradation due to the accumulation of rain or snow around the bottom of the container while being stored outside.

[3] Container on spill pallet or in secondary containment: for waste with free liquids; over packing the container in a large container is considered secondary containment.

[4] Container closed: closed means contents will not spill out if container is tipped over. Plastic covering on boxes is acceptable as long as the corners are protected from punctures.

[5] 90 Day Accumulation Area signage and area established: for 90 day containers outside of the farms; the area must be delineated using fences or other structures i.e. cabinets or rooms, or portable ropes chains or cattle guards, sign(s) identifying 90 day accumulation area, aisle space is maintained (30 inches between rows) and containers are compatible with the waste.

[6] 90 Day Accumulation Container label: 90 day container marked as “90 Day Accumulation Container.”

[7] Satellite Accumulation Area signage and area established: for SAA containers outside of the farms; the area must be delineated using fences or other structures i.e. cabinets or rooms, or portable ropes chains or cattle guards, sign(s) identifying Satellite Accumulation Area, aisle space is maintained (30 inches between rows) and containers are compatible with the waste.