

Los Alamos

NATIONAL LABORATORY

memorandumChemical Science and Technology
Responsible Chemistry for AmericaCST-7 Waste Management, MS 1592
Los Alamos, New Mexico 87545

To/MS: Jorg Jansen, ER Program Manager, MS M992
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 Phone/FAX: 665-8467/665-8347
 Symbol: CST-7G-94-308
 Date: May 23, 1994

**SUBJECT: CONDITIONS TO BE MET FOR CST-7 WASTE MANAGEMENT
 FACILITIES TO RESUME RECEIVING ER PROGRAM GENERATED WASTE**

Effective retroactively to May 18, 1994, the Waste Management Group (CST-7) treatment, storage, and disposal (TSD) facilities will not accept waste generated by or from the ER Program. This action is in response to mis-characterized waste being sent to TA-54, Area G during April and May, 1994.

The following actions must be completed and approved by CST-7 for this ban to be lifted:

1. The ER Waste Characterization/Certification SOP(s) must be completed, and the scope expanded to include item 2 below.
2. The ER Program must provide a thorough analysis and discussion of how the knowledge of process (KOP) will be used (or excluded, more appropriately) for *waste characterization*, as opposed to *site characterization*. A policy on the use or exclusion of KOP for waste characterization, based on an analysis of its validity, should be included in the ER Waste Characterization/Certification SOP mentioned above.
3. Results of the fifteen samples sent for isotopic analysis from the Church site must be submitted to CST-7, along with recommendations from the ER Program statisticians on applying the sampling results to characterization of the 2,800 cubic meters of waste disposed at Area G from the church site during July and August, 1993. The low-level data base (which is queried at least once a week concerning radionuclide inventories and activities) has been using the information from one "hot spot" analysis to characterize the entire volume of Church waste for almost a year now.
4. The Memorandum of Understanding between the ER Program and CST-7 must be finalized.
5. A schedule must be provided describing how and when future waste characterization will include analysis from State of Utah approved analytical laboratories to enable the option of shipping waste to Envirocare, Utah.
6. CST-7 must concur with all reports prepared pursuant to DOE 5000.3b prior to submittal.



Jorg Jansen, ER Program Manager
CST-7G-94-308

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Our staff will be available to assist the ER staff on these documents and provide timely review and comment as needed. ESH-8 concurrence may also be required. Please contact John Krueger of my staff with any questions at 665-8467.

AFD:ls

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