

United States Government


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Department of Energy

memorandum

 Carlsbad Field Office
Carlsbad, New Mexico 88221


DATE: JUL 27 2011
 REPLY TO: CBFO:NTP:NC:GS:11-1418:UFC 5900.00
 ATTN OF:
 SUBJECT: ORNL-CCP Recertification Audit A-11-08 CH and RH Activities
 TO: William (Bill) McMillan, DOE-Oak Ridge
 M. F. Sharif, General Manager, Washington TRU Solutions LLC

The Carlsbad Field Office (CBFO) has completed the recertification audit of the Central Characterization Project (CCP) Transuranic (TRU) waste program deployed at the Oak Ridge National Laboratory (ORNL) (hereinafter referred to as ORNL-CCP) Audit A-11-08 conducted February 8-11, 2011, at Oak Ridge, Tennessee. The characterization activities were determined to be adequate, satisfactorily implemented, and effective.

The CCP Quality Assurance Program (QAP) was audited during Audit A-10-11 on March 2-4, 2010, in Carlsbad, New Mexico. The CCP QAP was found to adequately address the upper-tier requirements of the CBFO Quality Assurance Program Document (QAPD) and is being effectively implemented.

CCP Contact-Handled (CH) and Remote-Handled (RH) transportation activities were evaluated in Carlsbad, New Mexico on September 21-23, 2010, during Audit A-10-25. Technical and quality assurance aspects of the transportation program were found to be effectively implemented.

The audit team determined that the ORNL-CCP TRU programs were in compliance with the Waste Analysis Plan (WAP) of the Waste Isolation Pilot Plant (WIPP) Hazardous Waste Facility Permit (HWFP), the QAPD, the Transuranic Waste Acceptance Criteria for the Waste Isolation Pilot Plant (WIPP WAC), and the CH and RH TRUPACT-II Authorized Methods of Payload Compliance (TRAMPAC), RH TRU 72B Safety Analysis Report (SAR), TRUPACT-II Certification of Compliance, Remote-Handled Transuranic Waste Characterization Program Implementation Plan (WCPPI). The audit team determined that the procedures/documents were effectively implemented.

Based on the results of Audits A-11-08, A-10-11, and A-10-25, and conditions and limitations provided by the New Mexico Environment Department (NMED) and the Environmental Protection Agency (EPA), the CBFO grants continued authority at the ORNL-CCP for characterization, certification, and transportation activities for CH retrievably stored soils/gravel (S4000), CH retrievably stored debris (S5000), and RH retrievably stored debris waste (S5000) as identified in Table 1, Page 3 of this memorandum.

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TRU waste characterization, certification, or transportation activities using significantly revised or new processes, procedures, or systems must be evaluated by the CBFO prior to their implementation. Included in this memo are the following attachments:

- Attachment 1 describes the CCP certification program status,
- Attachment 2 contains the list of equipment certified at the site,
- Attachment 3 contains the list of CCP procedures, and
- Attachment 4 describes specific CCP waste characterization process elements that must be reported to CBFO. These process elements are identified as Tier 1 changes and Tier 2 changes. The ORNL-CCP shall not ship for disposal at WIPP any wastes affected by a Tier 1 process element change without prior CBFO approval, and CCP shall report Tier 2 changes to CBFO on a quarterly basis.

If you have any questions, please contact J.R. Stroble, Office of National TRU Program Director, at (575) 234-7313.

Edward Ziemianski
Acting Manager

Attachments (4)

cc: w/attachments

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F. Sharif, WTS	ED	WIPP Operating Record	
M. Percy, WTS	ED	CBFO M&RC	
D. Ploetz, WTS	ED	*ED denotes electronic distribution	

Table 1-Approved CH & RH Waste Characterization Processes at ORNL-CCP						
Processes	CH S4000 Soils		CH S5000 Debris		RH S5000 Debris	
	Newly generated	Retrievably- Stored	Newly generated	Retrievably- Stored	Newly generated	Retrievably- Stored
Acceptable Knowledge	N/A	Approved	N/A	Approved	N/A	Approved
Load Management	N/A	N/A	N/A	N/A	N/A	N/A
Project-Level Data Validation and Verification (V&V)	N/A	Approved	N/A	Approved	N/A	Approved
Visual Examination	N/A	N/A	N/A	Approved	N/A	Approved
Solids Sampling and Analysis	N/A	N/A	N/A	N/A	N/A	N/A
Soils Sampling and Analysis ¹	N/A	Approved	N/A	N/A	N/A	N/A
Headspace Gas Sampling (SUMMA) ²	N/A	N/A	N/A	Approved	N/A	Approved
Nondestructive assay (NDA) (SGS, DWAS/IPAN, & IQ3)	N/A	Approved	N/A	Approved	N/A	N/A
Radiological Characterization	N/A	N/A	N/A	N/A	N/A	Approved
Real-time Radiography	N/A	Approved	N/A	Approved	N/A	N/A
WIPP Waste Information System	N/A	Approved	N/A	Approved	N/A	Approved
¹ Sampling is performed by Advanced Mixed Waste Treatment Project (AMWTP). Analysis is performed by the Idaho National Laboratory (INL), which is approved under a separate certification. ² Analysis performed by the INL, which is approved under a separate certification.						

CENTRAL CHARACTERIZATION PROJECT AT OAK RIDGE NATIONAL LABORATORY CERTIFICATION PROGRAM STATUS

The CBFO Director of the Office of the National TRU Program and the CBFO Quality Assurance Director evaluated the documentation supporting the compliance of the Central Characterization Project (CCP) TRU waste program deployed at the Oak Ridge National Laboratory (ORNL). Attachments 2, 3, and 4 provide complete lists of certified processes, procedures, documents, and systems deployed at the ORNL-CCP.

PROGRAM STATUS

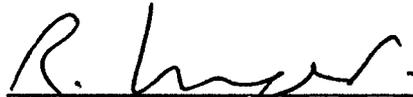
- All program elements remain complete.
- The following site documents are current and demonstrate how the CCP complies with the CBFO requirements from A-11-08.
 - **QAPjP – CCP-PO-001, Revision 20 - CCP Transuranic Waste Characterization Quality Assurance Project Plan** (Approved June 15, 2011 – CBFO:NTP:JRS:GS:11-0351:UFC 5900.00).
 - **WCP - CCP-PO-002, Revision 25 - CCP Transuranic Waste Certification Plan** (Approved December 20, 2010 – CBFO:NTP:JRS:GS:10-2076:UFC 5900.00).
QAP - Section 4.0 of CCP-PO-002.
 - **TRAMPAC – CCP-PO-003, Revision 12, CCP Transuranic Authorized Methods for Payload Control (CCP CH-TRAMPAC)** (Approved December 17, 2010 – CBFO:NTP:MRB:GS:10-2055:UFC:5900.00).
 - **RH-TRAMPAC – CCP-PO-505, Revision 0, CCP Remote-Handled Transuranic Waste Authorized Methods for Payload Control (CCP RH-TRAMPAC)** (CBFO:NTP:CF:GS:06-1355:UFC 5900.00 dated September 20, 2006)
- Certified Systems - see Attachment 2 for the complete list of certified systems used by the CCP at the ORNL
- Standard operating procedures - see Attachment 3 for the complete list of certified procedures used by the CCP at the ORNL
- Tiering of TRU Waste Characterization Processes implemented by CCP at ORNL (based on EPA Baseline Inspections) - see Attachment 4

- CCP participated in the following performance demonstration programs (PDPs) for Audit A-11-08:
 - **HSG PDP (CCP INL)** For CH waste, SUMMA sampling is performed by CCP; analysis is performed by the Idaho National Laboratory, which is approved under a separate certification.
 - **NDA PDP** – Cycle 18A approved for radioassay of WIPP wastes contained in TRU waste drums using the IQ3 (OR02/ORG1).
Memo CBFO:NTP:MRB:GS:11-0385:UFC 5800.00 dated July 6, 2011.
- CBFO conducted a Quality Assurance Program Audit A-10-11 on March 2-4, 2010.
 - Audit Report was issued on March 16, 2010.
- CBFO conducted CH and RH Transportation Audit A-10-25 for all sites on September 21-23, 2010.
 - Audit Report was issued on October 5, 2010.
- CBFO conducted Surveillance S-11-14 of the ORNL CCP RH Waste Sampling and Analysis.
 - Surveillance Report was issued on March 15, 2011.
- CBFO conducted Surveillance S-11-16 of the ORNL CCP transition from the GWAS software to NDA 2000 for the IQ3 measurement system.
 - Surveillance Report was issued on April 15, 2011.
- CBFO conducted the CH and RH Recertification Audit A-11-08 of the ORNL-CCP on February 8-10, 2011.
 - Interim Audit Report was issued March 9, 2011.
 - Final Audit Report was issued to NMED on May 4, 2011.
 - NMED issued approval on June 17, 2011.
- CBFO requested a revised Tier 1 change to include 2 containers of waste from the NFS burial trench soils (S4000) to Waste Stream OR-NFSW-CH-SOIL on February 15, 2011.
 - CBFO received EPA's approval of the Tier 1 change for additional containers to the S4000 (Soils/Gravel) Waste Summary Category Group at ORNL on March 23, 2011.
- EPA issued concurrence on the draft CBFO recertification memo on July 21, 2011.

RECOMMENDATION

The recommendation to the CBFO Manager is to continue the CCP authority for characterization, certification, and transportation of contact-handled (CH) transuranic (TRU) soils/gravel (S4000) and debris (S5000) waste and remote-handled (RH) TRU debris (S5000) waste at the ORNL. Attachments 2, 3, and 4 list the systems and procedures that constitute the bounds of this authority.

CONCURRENCE



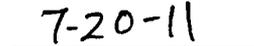
Randy Unger, Director
Office of Quality Assurance



Date



J.R. Stroble, Director
Office of the National TRU Program



Date

CENTRAL CHARACTERIZATION PROJECT					
LIST OF CH AND RH CERTIFIED EQUIPMENT AND PROCESSES AT OAK RIDGE NATIONAL LABORATORY					
WIPP WWIS #	Site Equipment # or Title	Description	Components	Software	NDA Calibrated Range, Operating Range and TMU
Headspace Gas (HSG)					
N/A	HSG	SUMMA Sampling process on selected waste containers from waste stream lots. Analysis is performed by the Idaho National Laboratory (INL), which is approved under a separate certification. (12HE4, 12HE5, 12HE6, 12HE9)	As identified in CCP-TP-093	As identified in CCP-TP-093	N/A
Solids Sampling					
N/A	Solids	Solids Sampling process on selected waste containers from waste stream lots. Sampling is performed by the Advanced Mixed Waste Treatment Project. Analysis is performed by the INL, which is approved under a separate certification. (12HA12, 12HA13, 12HA10, 12HA3, 12HA14, 12HA8, 12HM10, 12HM3, 12HM11, 12HM8, 12HM12, and 12HM9)	As identified in CCP-TP-181, CCP-TP-182, CCP-TP-183, CCP-TP-184, CCP-TP-185, CCP-TP-186, CCP-TP-187	As identified in CCP-TP-181, CCP-TP-182, CCP-TP-183, CCP-TP-184, CCP-TP-185, CCP-TP-186, CCP-TP-187	N/A
Nondestructive Assay (NDA)					
16IQ1	IQ3	Canberra Mobile Qualitative and Quantitative Drum Counter with Isotopics (IQ3) Procedure CCP-TP-046,	<ul style="list-style-type: none"> • High Sensitivity Gamma Waste Assay System • 3 HPGe Coaxial Detectors • 3 LEGe Detectors 	<ul style="list-style-type: none"> • NDA-2000 	The calibration of the IQ3 is documented in MCS-IQ3-CALIB-2009, "Calibration Report for the MCS IQ3", MCS-IQ3-TMU-2009. Total Measurement Uncertainty for the MCS IQ3 documents the

CENTRAL CHARACTERIZATION PROJECT					
LIST OF CH AND RH CERTIFIED EQUIPMENT AND PROCESSES AT OAK RIDGE NATIONAL LABORATORY					
WIPP WWIS #	Site Equipment # or Title	Description	Components	Software	NDA Calibrated Range, Operating Range and TMU
		CCP-TP-047, CCP-TP-048			estimate of total measurement uncertainty.
Dose-to-Curie (DTC)					
16DTC1	Dose-to-Curie	Radiological characterization process Procedure CCP-TP-504	As identified in CCP-TP-504	As identified in CCP-TP-504	N/A
Nondestructive Examination (NDE)					
16RR1	MCS RTR #6	Real-Time Radiography Mobile Characterization System RTR #6 Procedure CCP-TP-053, CCP-TP-165	<ul style="list-style-type: none"> • Shielded x-ray enclosure with a hydraulic drum loading door and manually opened personnel door • Conveyer cart including drum manipulation equipment • X-ray imaging system including x-ray tube, image intensifier, and video camera • Video/audio recording equipment • Mobile platform 	N/A	N/A
Visual Examination (VE)					
16RHVE1	Visual Examination	Visual Examination Procedure CCP-TP-500	N/A	N/A	N/A
16VE1	Visual Examination	Visual Examination Procedure CCP-TP-113	N/A	N/A	N/A

CENTRAL CHARACTERIZATION PROJECT CH AND RH LIST OF PROCEDURES AT OAK RIDGE NATIONAL LABORATORY		
#	Procedure No.	Procedure Title
1.	CCP-PO-001	CCP Transuranic Waste Characterization Quality Assurance Project Plan
2.	CCP-PO-002	CCP Transuranic Waste Certification Plan
3.	CCP-PO-003	CCP Transuranic Authorized Methods for Payload Control (CCP CH-TRAMPAC)
4.	CCP-PO-005	CCP Conduct of Operations
5.	CCP-PO-008	CCP Quality Assurance Interface with the WTS Quality Assurance Program
6.	CCP-PO-016	CCP Gas Generation Testing Program Quality Assurance Project Plan
7.	CCP-PO-026	CCP Configuration Management Plan
8.	CCP-PO-027	CCP/TRU Waste Processing Center/Oakridge National Laboratory Interface Document
9.	CCP-PO-505	CCP Remote-Handled Transuranic Waste Authorized Methods for Payload Control (CCP RH-TRAMPAC)
10.	CCP-QP-001	CCP Graded Approach
11.	CCP-QP-002	CCP Training and Qualification Plan
12.	CCP-QP-004	CCP Corrective Action Management
13.	CCP-QP-005	CCP TRU Nonconforming Item Reporting and Control
14.	CCP-QP-006	CCP Corrective Action Reporting and Control
15.	CCP-QP-008	CCP Records Management
16.	CCP-QP-010	CCP Document Preparation, Approval, and Control
17.	CCP-QP-011	CCP Laboratory Logbooks
18.	CCP-QP-014	CCP Quality Assurance Trend Analysis and Reporting
19.	CCP-QP-015	CCP Procurement
20.	CCP-QP-016	CCP Control of Measuring and Testing Equipment
21.	CCP-QP-017	CCP Identification and Control of Items
22.	CCP-QP-018	CCP Management Assessment
23.	CCP-QP-019	CCP Quality Assurance Reporting to Management
24.	CCP-QP-021	CCP Surveillance Program
25.	CCP-QP-022	CCP Software Quality Assurance Plan
26.	CCP-QP-023	CCP Handling, Storage and Shipping
27.	CCP-QP-025	CCP Lessons Learned Program Management Control Procedure
28.	CCP-QP-026	CCP Inspection Control
29.	CCP-QP-027	CCP Test Control
30.	CCP-QP-028	CCP Records Filing, Inventorying, Scheduling, and Dispositioning
31.	CCP-QP-030	CCP Written Practice for the Qualification of CCP Helium Leak Detection Personnel
32.	CCP-QP-036	CCP Qualification of Acceptable Knowledge for Remote-Handled Transuranic Waste Through a Quality Assurance Equivalency Demonstration
33.	CCP-TP-001	CCP Project Level Data Validation and Verification
34.	CCP-TP-002	CCP Reconciliation of DQOs and Reporting Characterization Data
35.	CCP-TP-003	CCP Data Analysis for S3000, S4000, and S5000 Characterization
36.	CCP-TP-005	CCP Acceptable Knowledge Documentation
37.	CCP-TP-028	CCP Radiographic Test and Training Drum Construction
38.	CCP-TP-030	CCP CH TRU Waste Certification and WWIS/WDS Data Entry
39.	CCP-TP-033	CCP Shipping of CH TRU Waste
40.	CCP-TP-046	CCP Mobile IQ3 System Calibration Procedure
41.	CCP-TP-047	CCP Mobile IQ3 Gamma Scanner Operation

CENTRAL CHARACTERIZATION PROJECT CH AND RH LIST OF PROCEDURES AT OAK RIDGE NATIONAL LABORATORY		
#	Procedure No.	Procedure Title
42.	CCP-TP-048	CCP Mobile IQ3 System Data Reviewing, Validating, and Reporting Procedure
43.	CCP-TP-053	CCP Standard Real-Time Radiography (RTR) Inspection Procedure
44.	CCP-TP-055	CCP Varian Porta-Test Leak Detector Operations
45.	CCP-TP-058	CCP NDA Performance Demonstration Program
46.	CCP-TP-068	CCP Standardized Container Management
47.	CCP-TP-082	CCP Preparing and Handling Waste Containers for Headspace Gas Sampling
48.	CCP-TP-083	CCP Gas Generation Testing
49.	CCP-TP-086	CCP CH Packaging Payload Assembly
50.	CCP-TP-092	CCP Mobile Gas Generation Testing Sampling System (MGSS) Data Calculation
51.	CCP-TP-093	CCP Sampling of TRU Waste Containers
52.	CCP-TP-106	CCP Headspace Gas Sampling Batch Data Report Preparation
53.	CCP-TP-113	CCP Standard Contact-Handled Waste Visual Examination
54.	CCP-TP-138	CCP Execution of Long-Term Objective for the Unified Flammable Gas Test Procedure
55.	CCP-TP-162	CCP Random Selection of Containers for Solids and Headspace Gas Sampling and Analysis
56.	CCP-TP-163	CCP-Standard Visual Examination of Records
57.	CCP-TP-165	CCP Real-Time Radiography #6 Operating Procedure
58.	CCP-TP-166	CCP Drum Waste Assay System Imaging Passive/Active Neutron Operations
59.	CCP-TP-167	CCP Drum Waste Assay System Imaging Passive/Active Neutron Calibration
60.	CCP-TP-168	CCP Drum Waste Assay System Imaging Passive/Active Neutron/Segmented Gamma Scanner Data Generation Level Validation
61.	CCP-TP-169	CCP Operating the Mobile Segmented Gamma Scanner
62.	CCP-TP-172	CCP Calibrating the Mobile Segmented Gamma Scanner
63.	CCP-TP-180	CCP Analytical Sample Management
64.	CCP-TP-500	CCP Remote-Handled Waste Visual Examination
65.	CCP-TP-504	CCP Dose-to-Curie Survey Procedure for Remote-Handled Transuranic Waste
66.	CCP-TP-506	CCP Preparation of Remote-Handled Transuranic Waste Acceptable Knowledge Characterization Reconciliation Report
67.	CCP-TP-507	CCP Shipping of Remote-Handled Transuranic Waste
68.	CCP-TP-509	CCP Remote-Handled Transuranic Container Tracking
69.	CCP-TP-512	CCP Remote-Handled Waste Sampling
70.	CCP-TP-530	CCP RH TRU Waste Certification And WWIS/WDS Data Entry

EPA Tiering of Contact-Handled Transuranic Waste Characterization Processes Implemented by ORNL-CCP

Waste Characterization Process Elements	ORNL-CCP Waste Characterization T1 Changes	ORNL-CCP Waste Characterization T2 Changes ^a
Acceptable Knowledge and Load Management	Implementation of load management Implementation of AK for wastes other than retrievably stored debris and soils/gravel (i.e., solids or any type of newly generated waste)	The elements listed as T2 changes below apply to all approved ORNL-CCP CH TRU waste streams and waste summary category groups Notification to EPA upon completion of AK accuracy reports and upon completion of new versions or updates/substantive changes ^b of the following: <ul style="list-style-type: none"> - AK-NDA memoranda - Site AK procedure CCP-TP-005 - AK accuracy reports - AK-AK and AK-NDA/NDE Discrepancy Resolution Reports - Attachments 4 and 6 and associated memoranda - WSPFs and AK summaries and related attachments for all new waste streams, including change notices - "Add Container" memoranda
Non-Destructive Assay	New equipment or physical modifications to approved equipment ^c Extension or changes to approved calibration range for approved equipment	Notification to EPA upon completion of changes to software for approved equipment, operating range(s), and site procedures that require CBFO approval
Real-Time Radiography	None	Notification to EPA upon the following: <ul style="list-style-type: none"> - Implementation of new RTR equipment or substantive changes^c to approved RTR equipment - Completion of changes to site RTR procedures requiring CBFO approvals
Visual Examination	None	None
WIPP Waste Data System	Implementation of load management	Notification to EPA upon completion of changes to WDS procedure(s) requiring CBFO approvals

^a ORNL-CCP will report all T2 changes to EPA at the end of each fiscal quarter

^b "Substantive changes" are changes with the potential to impact the site's waste characterization activities or documentation thereof, excluding changes that are solely related to Environment, Safety, and Health; nuclear safety; or *Resource Conservation and Recovery Act* (RCRA), or that are editorial in nature

^c Modifications to approved equipment include all changes with the potential to affect NDA data relative to waste isolation and exclude minor changes, such as the addition of safety-related equipment

EPA Tiering of Remote-Handled Transuranic Waste Characterization Processes Implemented by ORNL-CCP

RH WC Process Elements	ORNL-CCP RH WC Process - T1 Changes	ORNL-CCP RH WC Process - T2 Changes*
Acceptable Knowledge (AK)	<p>Addition of any new waste streams not approved under this baseline (AK-1)</p> <p>Modification of the approved population of the OR-REDC-RH-HET wastes to include any containers not included in the CCP-AK-ORNL-501, Revision 1 analysis (AK-1)</p> <p>Modification(s) resulting from incorporation of new information specific to the approved RH debris waste (OR-REDC-RH-HET) population to the following documents: CSSF (AK-1 and AK-2); CCP-AK-ORNL-501 (AK-1); CCP-AK-ORNL-500 (AK-2 and AK-9); AKSR (AK-6); CTP (AK-9); AK Accuracy Reports (AK-1 and AK-15); and the WSPF (AK-14)**</p> <p>Implementation of load management (AK-16)</p>	<p>Notification to EPA when updates are made to the documents included in AK-1, AK-2, AK-3, AK-4, AK-6, AK-9, AK-13, AK-14, and AK-15, outside of the specific T1 changes listed in the previous column**</p> <p>Notification to EPA of availability of and/or revisions to Add Container Memoranda (AK-3)</p> <p>Notification to EPA of availability of documentation of RH sample reclassified as CH and subject to confirmatory analyses via NDA (AK-9)</p> <p>Notification to EPA of availability of DRFs or data limitation information pertaining to CCP's assessment of ORNL's original radiological characterization of wastes generated post-1999 (AK-13)</p>
Radiological Characterization, Dose-to-Curie (DTC), and the application of radionuclide-specific scaling factors	<p>Application of new scaling factors for isotopic determination other than those documented in CCP-AK-ORNL-501 (RC-3)</p> <p>Use of any alternate radiological characterization procedure other than DTC, with established scaling factors as documented in CCP-TP-504, Revision 6, or substantive modification of the DTC procedure*** (RC-4)</p> <p>Any new waste stream not approved under this baseline or addition of containers to Waste Stream OR-REDC-RH-HET that requires changing the documented radionuclide scaling factors in CCP-AK-ORNL-501 (RC-4)</p>	<p>Revisions of CCP-AK-ORNL-501 or CCP-TP-504 that require CBFO approval (RC-3), (RC-4), (RC-8)**</p> <p>Results from any RH TRU container(s) that qualify as CH and are subject to NDA (RC-8)</p>
Visual Examination (VE)	Implementation of VE by any system other than two operators performing VE**** (VE-2)	<p>Changes to VE procedure(s) that require CBFO approval (VE-1)**</p> <p>Addition of new Summary Category Groups to the VE process that is subject to this approval (VE-2)</p>
WIPP Waste Information System (WWIS)	None at this time.	<p>Changes to WWIS procedure(s) that require CBFO approval (WWIS-1)**</p> <p>Changes to the Excel spreadsheet titled WWIS Data Entry Summary Characterization and Certification (WWIS-2)</p>

* ORNL-CCP will report all T2 changes to EPA every three months

** Excluding changes that are editorial in nature or are required to address administrative concerns

*** *Substantive modification* refers to a change with the potential to affect ORNL-CCP's RH WC process, e.g., the use of an inherently different type of measurement instrument system or a gamma probe not described in CCP-TP-504

**** This approval is limited to actual execution of VE using two operators at the TWPC as opposed to viewing a previously recorded VE event