

Investigation into the possibility of payload-managing liquids  
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Idaho National Laboratory has inquired about the possibility of payload managing the liquid in drums. Drums that contain several gallons of liquid have been retrieved at INL, and rather than treat and repackage the waste to remove the liquid, INL would like to ship them in their current state with the understanding that the average liquid over the entire TRUPACT-II payload of drums would not exceed 1%.

However, the Hazardous Waste Facility Permit (section 2.3.3.1, page 2-4) is clear that the liquid contained in each drum, not the payload, cannot exceed 1% (emphasis added):

- *Observable liquid shall be no more than 1 percent by volume of the outermost container at the time of radiography or visual examination.*
- Internal containers with more than 60 milliliters or 3 percent by volume observable liquid, whichever is greater, are prohibited.
- Containers with Hazardous Waste Number U134 (hydrofluoric acid) assigned shall have no observable liquid.
- *Overpacking the outermost container that was examined during radiography or visual examination or redistributing untreated liquid within the container shall not be used to meet the liquid volume limits.*

Furthermore, the CH-TRAMPAC (section 2.6.1, page 2.6-1) states that "liquid waste is prohibited in payload containers, except for residual amounts in well-drained containers. The total volume of residual liquid in a payload container shall be less than 1 percent (volume) of the payload container". A payload container is defined as drums, pipe overpacks, standard waste boxes, ten drum overpacks, and shielded containers.

References:

New Mexico Environment Department. Waste Isolation Pilot Plant Hazardous Waste Facility Permit. NM4890139088-TSDF, Santa Fe, New Mexico.  
(<http://www.wipp.energy.gov/library/rcrappermit/rcrappermit.htm>)

U.S. Nuclear Regulatory Commission. Contact-Handled Transuranic Waste Authorized Methods for Payload Control (CH-TRAMPAC). Washington, D.C., Office of Regulatory Procedures, U.S. Nuclear Regulatory Commission.  
([http://www.wipp.energy.gov/Documents\\_Transportation.htm](http://www.wipp.energy.gov/Documents_Transportation.htm))