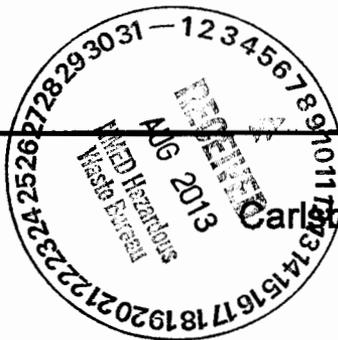


United States Government

Department of Energy

memorandumCarlsbad Field Office
Carlsbad, New Mexico 88221

DATE: AUG 8 2013

REPLY TO
ATTN OF: CBFO:NTP:JRS:PG:13-0656:UFC 5900.00

SUBJECT: AMWTP Expansion to Recertification Audit A-12-03 to Include the EPA Tier 1 for the Addition of the Pre-1980 INL-Exhumed SDA CH Waste from SCGs S3000 and S5000 to the BN-510 Waste Stream

TO: Benjamin Roberts, DOE-ID

The Carlsbad Field Office (CBFO) is expanding the certification of the Idaho National Laboratory (INL) Advanced Mixed Waste Treatment Project's (AMWTP) Contact-Handled (CH) certification memorandum, CBFO:NTP:JRS:PG:13-0458, dated April 12, 2013. This expansion reflects the following at the AMWTP:

- The U.S. Environmental Protection Agency (EPA) inspection report dated July 9, 2013, (Docket No. A-98-49, II-A4-174) for the Tier 1 change to include the two CH TRU waste types to the BN-510 waste stream. This approval allows AMWTP to characterize pre-1980 INL-exhumed waste from two exhumations within the Subsurface Disposal Area (SDA) at INL: the Initial Drum Retrieval (IDR) and Early Waste Retrieval (EWR). This approval is for (a) direct shipment (waste in uncompact containers) and supercompaction of containers with CH debris Summary Category (SCG) S5000; and (b) direct shipment of homogenous solid waste SCG S3000. AMWTP must submit the Batch Data Reports (BDRs) along with the Tier 2 changes that AMWTP routinely submits to EPA on a quarterly basis.

The CBFO completed the annual recertification audit A-12-03 of the AMWTP's transuranic (TRU) waste characterization activities at the INL conducted November 1-3, 2011. The characterization and certification activities were determined to be adequate, satisfactorily implemented, and effective.

The audit team determined that the AMWTP TRU program was in compliance with the *Waste Analysis Plan (WAP)* of the Waste Isolation Pilot Plant (WIPP) Hazardous Waste Facility Permit (HWFP), the *CBFO Quality Assurance Program Document (QAPD)*, and the *TRU Waste Acceptance Criteria for the Waste Isolation Pilot Plant (WIPP WAC)*. The audit team determined that the procedures/documents were effectively implemented.

Based on the results of the CBFO Audits/Surveillances (See Attachment 1), and conditions and limitations provided by the New Mexico Environment Department (NMED) and the EPA, the CBFO is authorizing the AMWTP to include the CH homogenous solids (S3000) and CH debris (S5000) from the SDA. The CBFO grants continued authority at the AMWTP for TRU waste characterization and certification activities as identified in Table 1, Page 4 of this memorandum.

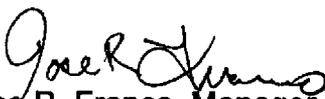
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TRU waste characterization and certification activities, using significantly revised or new processes, procedures, or systems must be evaluated by the CBFO prior to their implementation. Included in this memorandum are the following attachments:

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

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


Jose R. Franco, Manager
Carlsbad Field Office

Attachments (4)

Mr. Benjamin Roberts

-3-

AUG 8 2013

cc: w/attachments

| | | | |
|----------------------|-----|-------------------------------------|----|
| G. Basabilvazo, CBFO | *ED | J. Haschets, NWP | ED |
| N. Castaneda, CBFO | ED | C. Luoma, NWP | ED |
| S. McCauslin, CBFO | ED | R. McGinnis, NWP | ED |
| D. Miehl, CBFO | ED | J. Morrison, NWP | ED |
| T. Morgan, CBFO | ED | L. Oberbeck, NWP | ED |
| M. Navarrete, CBFO | ED | S. Offner, NWP | ED |
| M. Pinzel, CBFO | ED | A. Ray, NWP | ED |
| J.R. Stroble, CBFO | ED | F. Romo, NWP | ED |
| J. Malmo, DOE-ID | ED | R. Romo, NWP | ED |
| J. Wells, DOE-ID | ED | D. Stegman, NWP | ED |
| G. Byrum, ITG | ED | M. Strum, NWP | ED |
| D. Haar, ITG | ED | K. Urquidez, NWP | ED |
| E. Schweinsberg, ITG | ED | J. Vernon, NWP | ED |
| G. Tedford, ITG | ED | M. Valentine, NWP | ED |
| E. Feltcorn, EPA | ED | C. Castillo, CTAC | ED |
| R. Joglekar, EPA | ED | J. Harvill, CTAC | ED |
| T. Peake, EPA | ED | P. Martinez, CTAC | ED |
| S. Holmes, NMED | ED | D. Sellmer, CTAC | ED |
| J. Kieling, NMED | ED | M. Carter, LANL-CO | ED |
| T. Kliphuis, NMED | ED | P. Gilbert, LANL-CO | ED |
| C. Smith, NMED | ED | G. Lyshik, LANL-CO | ED |
| S. Castro, NWP | ED | W. Weyerman, LANL-CO | ED |
| R. Galbraith, NWP | ED | S. Percy, SM Stoller | ED |
| K. Guillermo, NWP | ED | WIPP Operating Record | ED |
| | | CBFO M&RC | |
| | | *ED denotes electronic distribution | |

| Table 1-Approved Waste Characterization Processes | | | | |
|--|-------------------------------|------------------------|--------------------|------------------------|
| Characterization Process ³ | CH S3000 Homogenous solids | | CH S5000 Debris | |
| | Newly generated | Retrievably- Stored | Newly generated | Retrievably- Stored |
| Acceptable Knowledge | N/A | Approved | Approved | Approved |
| Load Management | N/A | Approved | Approved | Approved |
| Data Validation & Verification (V&V) | Approved | Approved | Approved | Approved |
| Visual Examination (VE) | Approved | Approved | Approved | Approved |
| Solid Sampling ¹ | Approved | Approved | N/A | N/A |
| Headspace Gas Sampling & Analysis | Approved | Approved | Approved | Approved |
| Nondestructive Assay (NDA) | Approved ² | Approved | Approved | Approved |
| Real-time Radiography (RTR) | Approved | Approved | Approved | Approved |
| WIPP Waste Information System (WWIS) | Approved | Approved | Approved | Approved |

¹Solid Sampling Analysis is performed at the INL TWCP.
²Nondestructive Assay (NDA) of newly generated S3000 waste is authorized for assaying using **ONLY** I/WAS units Z-211-102 and Z-211-103.
³Characterization Processes in this table may not be completely listed in Attachment 2.

CERTIFICATION PROGRAM STATUS at the Advance Mixed Waste Treatment Project

The Carlsbad Field Office (CBFO) Director of the Office of the National Transuranic (TRU) Program and the CBFO Director of the Office of Quality Assurance has evaluated the documentation supporting the compliance of the Advanced Mixed Waste Treatment Project (AMWTP) TRU waste program.

PROGRAM STATUS

All program elements remain complete.

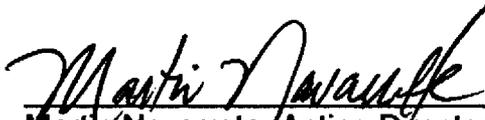
- The following site documents are current and complies with the CBFO requirements:
 - **MP-TRUW-8.1, Revision 24 – Certification Plan for INL Transuranic Waste**, Approved June 5, 2013 - CBFO:NTP:JRS:PG:13-0599:UFC 5900.00
 - **MP-TRUW-8.2, Revision 17 – Quality Assurance Project Plan**, Approved June 11, 2013 - CBFO:NTP:JRS:PG:13-0603:UFC 5900.00
- Certified Systems - see Attachment 2 List of Processes/Equipment from Table 1 of this Memorandum that is certified and used by the AMWTP.
- Standard operating procedures - see Attachment 3 for the complete list of certified procedures/documents used by the AMWTP.
- Tiering of the contact-handled (CH) TRU Waste Characterization Processes – see Attachment 4 for the implementation by AMWTP (based on Environmental Protection Agency [EPA] Baseline Inspections).
- AMWTP participated in the following performance demonstration programs (PDPs):
 - **HSG PDP – Cycle 26A approved** for analysis of Volatile Organic Compounds (VOCs) in headspace gas samples (HSG) using the GC/MS analytical method on the analytical system identified as Z-221-001-A.
Memo CBFO:NTP:MRB:GL:12-0505:UFC 5822.00 dated June 4, 2012.
 - **NDA PDP – Cycle 20A approved** analysis of TRU waste drums using the DAS-100 (AM03/AMN3), DAS-101 (AM04/AMN4), DAS-102 (AM01/AMN1), and DAS-103 (AM02/AMN2)
Memo CBFO:NTP:MB:CC:13-0641:UFC 5900.00 dated July 8, 2013.

- The CBFO conducted recertification audit A-12-03 of the AMWTP on November 1-3, 2011.
 - No Corrective Action Reports (CARs) were issued.
 - Interim Audit Report was issued on November 30, 2011.
 - Final Audit Report was issued to the New Mexico Environment Department (NMED) on March 16, 2012.
 - NMED issued approval of the Final Audit Report on May 1, 2012.
 - EPA provided concurrence on the draft certification memo on May 23, 2012.
- The CBFO submitted a request to the New Mexico Environment Department (NMED) to terminate the Settlement Agreement and Stipulated Final Order, No. HWB 04-07 (CO) on July 6, 2012.
 - NMED agreed to the termination of the Settlement Agreement and Stipulated Final Order No. HWB 04-07 (CO) on August 16, 2012.
 - EPA provided concurrence on the draft amended certification memo on August 30, 2012.
- The CBFO requested Tier 1 changes adding the Materials and Fuels complex (MFC) waste and the Argonne National Laboratory East (ANL-E) waste to the AMWTP certified program.
 - EPA issued an inspection report on January 29, 2013 (DOCKET No: A-98-49, II-A4-169) and provided approval via email on February 27, 2013.
 - EPA provided concurrence on the draft expansion memo on March 19, 2013.
- The CBFO conducted Surveillance S-13-21 using the Supercompactor to breach prohibited containers and remove prohibited items from 55-gallon drums of CH S5000 (debris) on March 20-21, 2013.
 - Surveillance report was issued on March 27, 2013.
 - EPA provided concurrence on the draft expansion memo on March 28, 2013.
- The CBFO requested a Tier 1 change for the addition of the pre-1980 INL-exhumed Subsurface Disposal Area (SDA) CH waste from SCGs S3000 and S5000 to the BN-510 Waste Stream. .
 - EPA issued approval and inspection report (DOCKET No. A-98-49, II-A4-174) on July 9, 2013.
- The EPA concurred with the draft CBFO expansion for the addition of the pre-1980 INL-exhumed SDA CH waste from SCGs S3000 and S5000 to the BN-510 Waste Stream on July 17, 2013.

RECOMMENDATION

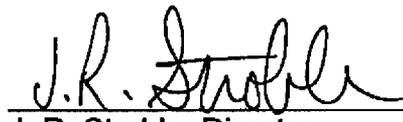
The recommendation to the CBFO Manager is for the Advanced Mixed Waste Treatment Project (AMWTP) to include the CH homogeneous solids (S3000) and the CH debris (S5000) from the Pre-1980 INL-Exhumed Subsurface Disposal Area into their certified program and to continue the authority for characterization and certification activities. Attachments 2 and 3 list the systems and procedures that constitute the bounds of this authority. Attachment 4 is the CH Tiering of TRU Waste Characterization Processes Implemented by the AMWTP.

CONCURRENCE



Martin Navarrete, Acting Director
Office of Quality Assurance

8-6-13
Date



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

7-22-13
Date

| AMWTP LIST OF CERTIFIED EQUIPMENT AND PROCESSES | | | | | |
|--|------------------|--|---|---|---|
| WIPP # | Site Equipment # | Equipment Description | Components | Software | NDA Calibrated Range, Operating Range and TMU |
| HEADSPACE GAS | | | | | |
| 9HG4 | Z-221-001-A | Consonant Technology Inc. (CTI) –Gas Chromatography/Mass Spectrometry (GC/MS) System PDP ID # CTI-HGAS-A-001 Method described in procedure INST-OI-43 | Agilent 5973N Network Mass Selective Detector – Unit 001 | HGAS Software, Version 1.23 | N/A |
| NONDESTRUCTIVE ASSAY | | | | | |
| 9DA1 | Z-211-102 | Canberra Integrated Waste Assay System (IWAS) for assay and isotopics on 55-gallon and 83/85-gallon drums DAS –102 - PDP Registration # AM01/AMN1 Method described in procedure INST-OI-14 | <ul style="list-style-type: none"> • Broad Energy Germanium (BEGe) gamma detectors • 122 helium-3 tubes used in passive neutron coincidence counting modality and the active neutron differential die-away modality • Cf-252/Cs-137 Add-A-Source (AAS) correction source • 14 MeV neutron generator • Fast Neutron Detector Packs (FNDP) | <ul style="list-style-type: none"> • NDA 2000 • Canberra's Genie 2000 • Multi-Group Analysis (MGA) • Multi-Group Analysis-Uranium (MGA-U) | <p>The calibration of IWAS system was verified and documented in the site acceptance reports CI-IDA-NDA-0051 through CI-IDA-NDA-0054</p> <p>The determination of TMU for the IWAS unit is documented in CI-IDA-NDA-0055, Total Measurement Uncertainty for the AMWTP Integrated Waste Assay Systems, Revision 1, July 30, 2003.</p> |
| 9DA2 | Z-211-103 | Canberra Integrated Waste Assay System (IWAS) for assay and isotopics on 55-gallon and 83/85-gallon drums DAS-103 - PDP Registration # AM02/AMN2 Method described in procedure INST-OI-14 | <ul style="list-style-type: none"> • Broad Energy Germanium (BEGe) gamma detectors • 122 helium-3 tubes used in passive neutron coincidence counting modality and the active neutron differential die-away modality • Cf-252/Cs-137 Add-A-Source (AAS) correction source • 14 MeV neutron generator • Fast Neutron Detector Packs (FNDP) | <ul style="list-style-type: none"> • NDA 2000 • Canberra's Genie 2000 • Multi-Group Analysis (MGA) • Multi-Group Analysis-Uranium (MGA-U) | <p>The calibration of IWAS system was verified and documented in the site acceptance reports CI-IDA-NDA-0051 through CI-IDA-NDA-0054</p> <p>The determination of TMU for the IWAS unit is documented in CI-IDA-NDA-0055, "Total Measurement Uncertainty for the AMWTP Integrated Waste Assay Systems", Revision 1, July 30, 2003.</p> |

| AMWTP LIST OF CERTIFIED EQUIPMENT AND PROCESSES | | | | | |
|--|------------------|--|---|---|---|
| WIPP # | Site Equipment # | Equipment Description | Components | Software | NDA Calibrated Range, Operating Range and TMU |
| 9DA3 | Z-390-100 | Canberra Integrated Waste Assay System (IWAS) - DAS3 – 55 gallon drums DAS-100 – PDP Registration # AM03/AMN3 Method described in INST-FOI-01 | <ul style="list-style-type: none"> • Broad Energy Germanium (BEGe) gamma detectors • 122 helium-3 tubes used in passive neutron coincidence counting modality and the active neutron differential die-away modality • Cf-252/Cs-137 Add-A-Source (AAS) correction source • 14 MeV neutron generator • Fast Neutron Detector Packs (FNDP) | <ul style="list-style-type: none"> • NDA 2000 • Canberra's Genie 2000 • Multi-Group Analysis (MGA) • Multi-Group Analysis-Uranium (MGA-U) | <p>The calibration of IWAS system was verified and documented in the site acceptance reports CI-IDA-NDA-0051 through CI-IDA-NDA-0054</p> <p>The determination of TMU for the IWAS unit is documented in CI-IDA-NDA-0055, Total Measurement Uncertainty for the AMWTP Integrated Waste Assay Systems, Revision 1, July 30, 2003.</p> |
| 9DA4 | Z-390-101 | Canberra Integrated Waste Assay System (IWAS) - DAS4 – 55 gallon drums DAS-101 – PDP Registration # AM04/AMN4 (Approved) Method described in INST-FOI-01 | <ul style="list-style-type: none"> • Broad Energy Germanium (BEGe) gamma detectors • 122 helium-3 tubes used in passive neutron coincidence counting modality and the active neutron differential die-away modality • Cf-252/Cs-137 Add-A-Source (AAS) correction source • 14 MeV neutron generator • Fast Neutron Detector Packs (FNDP) | <ul style="list-style-type: none"> • NDA 2000 • Canberra's Genie 2000 • Multi-Group Analysis (MGA) • Multi-Group Analysis-Uranium (MGA-U) | <p>The calibration of IWAS system was verified and documented in the site acceptance reports CI-IDA-NDA-0051 through CI-IDA-NDA-0054</p> <p>The determination of TMU for the IWAS unit is documented in CI-IDA-NDA-0055, Total Measurement Uncertainty for the AMWTP Integrated Waste Assay Systems, Revision 1, July 30, 2003.</p> |
| NON-DESTRUCTIVE EXAMINATION | | | | | |
| 9RR1 | Z-213-101 | Real Time Radiography System Method described in INST-OI-12 and INST-OI-81 | RTR System | Waste Tracking System (WTS) | N/A |

| AMWTP LIST OF CERTIFIED EQUIPMENT AND PROCESSES | | | | | |
|--|-------------------------|--|---|-----------------------------|--|
| WIPP # | Site Equipment # | Equipment Description | Components | Software | NDA Calibrated Range, Operating Range and TMU |
| 9RR2 | Z-213-106 | Real Time Radiography System Method described in procedure INST-OI-12 and INST-OI-81 | RTR System | Waste Tracking System (WTS) | N/A |
| SOLIDS | | | | | |
| 9DC1 | Z-250-802 | Drum Coring and Sample Collection Glove Box Method – BN-MDC Method described in procedure INST-OI-16, INST-OI-73, and INST-OI-75 | Drum Coring and Sample Collection Glove Box | Waste Tracking System (WTS) | N/A |
| VISUAL EXAMINATION | | | | | |
| 9VE2 | N/A | Visual Examination (in lieu of RTR) (VEC) Method described in INST-OI-34 | N/A | Waste Tracking System (WTS) | N/A |
| 9VE3 | N/A | Newly Generated Waste Visual Examination Closure (VNC) Method described in INST-OI-34 | N/A | Waste Tracking System (WTS) | N/A |
| 9VE5 | N/A | Visual Examination (in lieu of RTR) (VEC) Method described in INST-FOI-17 | N/A | Waste Tracking System (WTS) | N/A |
| 9VE6 | N/A | Newly Generated Waste Visual Examination Closure (VNC) Method described in INST-FOI-17 | N/A | Waste Tracking System (WTS) | N/A |
| 9VE7 | N/A | Box Line Visual Examination (VEB) – Box to drum repackaging Method described in INST-FOI-17 | N/A | Waste Tracking System (WTS) | N/A |
| 9VE8 | N/A | Box Line Visual Examination (VEB) – Drum to new drum repackaging Method described in INST-FOI-17 | N/A | Waste Tracking System (WTS) | N/A |

| AMWTP LIST OF CERTIFIED EQUIPMENT AND PROCESSES | | | | | |
|--|-------------------------|--|-------------------|-----------------------------|--|
| WIPP # | Site Equipment # | Equipment Description | Components | Software | NDA Calibrated Range, Operating Range and TMU |
| 9VE10 | N/A | Box Line Visual Examination (VEB) – Drum to new drum repackaging Method described in INST-OI-34 | N/A | Waste Tracking System (WTS) | N/A |

| AMWTP DEACTIVATED EQUIPMENT LIST | | | |
|---|------------------|---|-------------------------------------|
| WIPP # | Site Equipment # | Equipment Description | Date Deactivated |
| HEADSPACE GAS | | | |
| 9HG1 | Z-220-001A | Nuclear Filter Technology Drum Vent System – Mass Spectrometer, Unit A | 8/6/06 |
| 9HG2 | Z-220-001B | Nuclear Filter Technology Drum Vent System – Mass Spectrometer, Unit B | 8/6/06 |
| 9HG3 | Z-220-001C | Nuclear Filter Technology Drum Vent System – Mass Spectrometer, Unit C | 8/6/06 |
| 9HG7 | Z-221-001D | Consonant Technology Inc. (CTI) –Gas Chromatography/Mass Spectrometry (GC/MS) System | Used for spare parts |
| 9HG6 | Z-221-001C | Consonant Technology Inc. (CTI) –Gas Chromatography/Mass Spectrometry (GC/MS) System | 4/14/08 |
| 9HG5 | Z-221-001B | Consonant Technology Inc. (CTI) –Gas Chromatography/Mass Spectrometry (GC/MS) System | 4/14/08 |
| VISUAL EXAMINATION | | | |
| 9VE9 | N/A | Box Line Visual Examination (VEB) – Box to Drum Repackaging | Expired in WDS February 23, 2011 |
| 9VE11 | N/A | Sludge Visual Examination Closure (VSC) – S3000 to a new container Method described in INST-FOI-22 | 2/6/12 |

| AMWTP LIST OF CERTIFIED PROCEDURES | | |
|---|-------------------|---|
| # | Procedure Number | Procedure Title |
| 1. | AMWTP-RPT-TRUW-03 | Drum Assay Technical Review Report |
| 2. | CI-IDA-NDA-0035 | Calibration Verification & Confirmation Procedure for the Integrated Waste Assay (IWAS) at AMWTP, Canberra Industries |
| 3. | CI-IDA-NDA-0055 | Total Measurement Uncertainty for the AMWTP Integrated Waste Assay Systems, Canberra Industries |
| 4. | INST-CD&M-11.1.2 | Facility Modification Proposal Preparation |
| 5. | INST-CD&M-11.2.1 | Software Version Control |
| 6. | INST-CD&M-11.2.2 | Software Inventory Classification |
| 7. | INST-CD&M-11.2.3 | System Data Change Request |
| 8. | INST-CD&M-11.2.6 | Temporary Software Override |
| 9. | INST-CMNT-10.5.1 | Calibration and Control of Measuring and Test Equipment |
| 10. | INST-CMNT-10.14.1 | Testing In-Plant and Process Instrumentation |
| 11. | INST-FOI-01 | In-Plant Drum Assay Operations |
| 12. | INST-FOI-17 | Facility Visual Examination Operations |
| 13. | INST-FOI-20 | Supercompactor and Post-Compaction Operations |
| 14. | INST-OI-09 | Retrieval Inspection Station Operations |
| 15. | INST-OI-11 | Waste Container Handling |
| 16. | INST-OI-12 | Real-Time Radiography Examinations (Certification Scans) |
| 17. | INST-OI-14 | Drum Assay Operations |
| 18. | INST-OI-34 | Non-Facility Visual Examination Operations |
| 19. | INST-OI-45 | Drum Filter Installation |
| 20. | INST-OI-50 | WMF-615 Filter Insertion Operation |
| 21. | INST-TRUW-8.1.1 | Drum Assay Post Maintenance Calibration & Verification |
| 22. | MP-CD&M-11.1 | Change Control |
| 23. | MP-CD&M-11.2 | Software Quality Assurance |
| 24. | MP-CMNT-10.5 | Measuring and Test Equipment Program |
| 25. | MP-CMNT-10.14 | In-Plant and Process Instrumentation Testing Program |
| 26. | MP-DOCS-18.1 | Developing Written Work Instructions |
| 27. | MP-DOCS-18.2 | Records Management |
| 28. | MP-DOCS-18.3 | Developing Management Procedures |
| 29. | MP-DOCS-18.4 | Document Control |
| 30. | MP-M&IA-17.1 | Management Assessment |
| 31. | MP-M&IA-17.2 | Independent Assessment |
| 32. | MP-M&IA-17.3 | Quality Assurance Surveillance |
| 33. | MP-PCMT-15.1 | Acquisition of Material and Services |
| 34. | MP-PCMT-15.21 | Material Management |
| 35. | MP-Q&SI-5.1 | Investigation and Root Cause Analysis |
| 36. | MP-Q&SI-5.3 | Corrective Action |
| 37. | MP-Q&SI-5.4 | Identification of Nonconforming Conditions |
| 38. | MP-Q&SI-5.6 | Graded Approach |
| 39. | MP-Q&SI-5.8 | Qualifying Supply Chain Inspectors, Auditors, Lead Auditors and Technical Specialists |

AMWTP Recertification Audit A-12-03 Expansion
To Include the Tier 1 Approval for the Addition of SDA
CH Waste from SCGs S3000 and S5000 to the BN-510 Waste Stream
August 2013

| AMWTP LIST OF CERTIFIED PROCEDURES | | |
|---|------------------|--|
| # | Procedure Number | Procedure Title |
| 40. | MP-RTQP-14.4 | Personnel Qualification and Certification |
| 41. | MP-RTQP-14.6 | Job Analysis |
| 42. | MP-RTQP-14.16 | Training Program Evaluation |
| 43. | MP-RTQP-14.19 | Training Records Administration |
| 44. | LST-RTQP-03-IM | WIPP Training Requirements Implementation Matrix |
| 45. | MP-TRUW-8.1 | Certification Plan for INL Transuranic Waste |
| 46. | MP-TRUW-8.2 | Quality Assurance Project Plan |
| 47. | MP-TRUW-8.5 | TRU Waste Certification |
| 48. | MP-TRUW-8.8 | Level I Data Validation |
| 49. | MP-TRUW-8.9 | Level II Data Validation |
| 50. | MP-TRUW-8.11 | Data Reconciliation |
| 51. | MP-TRUW-8.12 | Waste Receipt and Shipping Inspection |
| 52. | MP-TRUW-8.13 | Collection, Review, and Management of Acceptable Knowledge Documentation |
| 53. | MP-TRUW-8.14 | Preparation of Waste Stream Profile Forms |
| 54. | MP-TRUW-8.26 | Reports to Management |

AMWTP Recertification Audit A-12-03 Expansion
To Include the Tier 1 Approval for the Addition of SDA
CH Waste from SCGs S3000 and S5000 to the BN-510 Waste Stream
August 2013

| AMWTP LIST OF CANCELLED/DEACTIVATED PROCEDURES | | | |
|---|------------------|--|------------------------|
| # | Procedure Number | Procedure Title | Deactivation Date |
| 1. | MP-TRUW-8.6 | Contact-Handled Transuranic Waste Authorized Methods for Payload Control (CH TRAMPAC) for HalfPACT (Incorporated into MP-TRUW-8.3) | 12/04 |
| 2. | INST-OI-44 | Sampling Port Installation | 1/26/06 |
| 3. | INST-OI-48 | Electronic TRUPACT-II Operations | 2/2/06 |
| 4. | INST-CD&M-11.1.1 | Facility Modification Screening | 6/5/06 |
| 5. | MP-PCMT-15.4 | Evaluation of Proposals (Superceded by MP-PCMT-15.21) | 6/30/06 |
| 6. | MP-CMNT-10.3 | Supply Chain Management (Superceded by MP-PCMT-15.21) | 7/12/06 |
| 7. | MP-PCMT-15.6 | Acceptance of Items and Services (Superceded by MP-PCMT-15.21) | 7/12/06 |
| 8. | MP-Q&SI-5.7 | Quality Inspections | 7/12/06 |
| 9. | INST-OI-18 | Gas Generation Testing Operations | 8/15/06 |
| 10. | MP-TRUW-04-IM | TRU Waste Program Procedures Matrix for DOE-CBFO QAP | 11/2/06 |
| 11. | INST-OI-49 | Electronic Payload Assembly | 12/11/06 |
| 12. | INST-TRUW-8.2.1 | HSG Calibration | 12/11/06 |
| 13. | MP-TRUW-8.19 | RTR/VE Drum Selection | 1/23/07 |
| 14. | MP-TRUW-8.16 | WWIS Data Transfer (Incorporated into MP-TRUW-8.5) | 7/3/07 |
| 15. | INST-OI-13 | Drum Vent/Headspace Gas Sample Operations | 8/07 |
| 16. | INST-OI-20 | TRUPACT-II Operations | 4/08 |
| 17. | INST-OI-21 | Payload Assembly | 4/08 |
| 18. | INST-OI-52 | Re-Lidding and Over-pack Reconfiguration Operations | 3/08 |
| 19. | MP-TRUW-8.3 | Contact-Handled Transuranic Waste Authorized Methods for Payload Control (CH-TRAMPAC) | 3/08 |
| 20. | MP-TRUW-8.4 | Quality Assurance Project Plan for Gas Generation Testing Program | 3/08 |
| 21. | MP-CMNT-10.10 | TRUPACT-II Maintenance Program | 4/08 |
| 22. | MP-TRUW-8.27 | CH-TRUCON Management | 3/08 |
| 23. | MP-TRUW-8.37 | Long-Term Objective for Unified Flammable Gas Determination | 3/08 |
| 24. | MP-PCMT-15.7 | Vendor Qualification and Performance Evaluation | 12/18/08 |
| 25. | INST-FOI-22 | Visual Examination of S3000 Waste in the Facility | 2/6/12 |
| 26. | INST-OI-16 | Drum Coring Operations | (Suspended 5/2/13) |
| 27. | INST-OI-43 | HGAS Sampling and Analysis Operations | (Suspended 5/6/13) |
| 28. | INST-OI-73 | Manual Drum Coring Operations | (Suspended 5/2/13) |
| 29. | INST-OI-75 | Container-in-Container Sampling | (Suspended 5/2/13) |
| 30. | INST-OI-81 | Real-Time Radiography Operations (For WIPP Certification Boxes) | (Cancelled 3/4/13) |
| 31. | MP-TRUW-8.17 | Co-located Core Sampling Control Charts | (Cancelled 6/10/13) |
| 32. | MP-TRUW-8.25 | Random Selection of Containers for Headspace Gas and Solids Sampling Analysis | (Suspended 6/10/13) |
| 33. | MP-TRUW-8.34 | WIPP Sample Transfer | (Cancelled 6/10/13) |

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

Table 1. Tiering of CH TRU Waste Characterization Processes Implemented by AMWTP
(Based on March 28–30 and April 11–13, 2006, Baseline Inspection and Subsequent T1 Evaluations, Updated July 2013)

| Process Elements | AMWTP CH Waste Characterization Processes – T1 Changes | AMWTP CH Waste Characterization Processes – T2 Changes* |
|---|--|--|
| Acceptable Knowledge, including Load Management | <p>Any new waste category</p> <p>Any waste from sources other than the Mound Site, Rocky Flats Environmental Technology Site, Battelle Columbus Laboratories, Bettis Atomic Power Laboratory, Argonne National Laboratory-East, the Materials and Fuels Complex, and pre-1980 INEL-exhumed Subsurface Disposal Area waste</p> <p>Load management of any new or unapproved waste stream</p> | <p>Notification to EPA upon completion of or substantive modification** to:</p> <ul style="list-style-type: none"> • Implementation of procedures and related documentation that formalize NDA-AK communication requirements • AK accuracy reports (annually, at a minimum) • All final WSPFs with related attachments (e.g., CIS), including updates or additions to waste streams within approved SCGs and summaries of radiological data for those containers included on the CIS drum list • New and revised AKSRs and generator-site-specific AK documents (e.g., RPT-TRUW-79, RPT-TRUW-89, RPT-TRUW-06, RPT-TRUW-83) • Item description code inclusion memoranda • The load management status of approved waste streams • Site procedures requiring CBFO approval • Any waste identified outside of the waste profiles included in the 2002 Transuranic Waste Baseline Inventory Report, when applicable • RPT-TRUW-05, RPT-TRUW-07 and RPT-TRUW-12 |
| Nondestructive Assay | <p>New equipment or substantive physical modifications to approved equipment**</p> <p>Extension of or changes to the approved calibration range for approved equipment</p> | <p>Notification to EPA upon substantive modification** to:</p> <ul style="list-style-type: none"> • Site procedures requiring CBFO approval • Software for approved equipment • Operating ranges upon CBFO approval |
| Real-Time Radiography | None | <p>Notification to EPA upon:</p> <ul style="list-style-type: none"> • Substantive modification** to site procedures requiring CBFO approval • New equipment or substantive physical modifications** to approved equipment |
| Visual Examination and Visual Examination Technique | Changes in the vendor performing visual examination or visual examination technique | <p>Notification to EPA upon:</p> <ul style="list-style-type: none"> • Substantive modification** to site procedures requiring CBFO approval • Addition of a new waste category • Addition of a new procedure or site equipment identifier |
| WTP Waste Data System | Changes to Waste Data System algorithms specific to load management | <p>Notification to EPA upon substantive modification** to:</p> <ul style="list-style-type: none"> • Site procedures requiring CBFO approval • The load management status of approved waste streams |

New T1s, T2s and significant modifications to existing T1s or T2s are in bold text; T1s or T2s that were only revised for style are not shown in bold.

* AMWTP will report all T2 changes to EPA every three months.

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

** "Substantive modification" refers to a change with the potential to affect AMWTP's CH waste characterization processes or documentation of them, excluding changes that are solely related to the environment, safety and health, nuclear safety, or the Resource Conservation and Recovery Act, or that are editorial in nature or are required to address administrative concerns. EPA may request copies of new references that DOE adds during a document revision.