



Department of Energy

Carlsbad Field Office  
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Hazardous Waste Bureau

Mr. John E. Kieling, Chief  
Hazardous Waste Bureau  
New Mexico Environment Department  
2905 Rodeo Park Drive East, Building 1  
Santa Fe, New Mexico 87505-6303

Subject: Response to the New Mexico Environment Department Request Regarding the Overpacking of Multiple Waste Streams in a Single Payload Container

Reference: DOE Memorandum CBFO:NTP:JRS:GL:13-0476:UFC 5900.00 from Mr. J. R. Stroble to Mr. John E. Kieling, dated August 1, 2013, subject: Overpacking of Multiple Waste Streams in a Single Payload Container

Reference: NMED HWB Memorandum from John E. Kieling to Mr. Jose R. Franco and Mr. M. F. Sharif, dated August 12, 2013, subject: Response to August 1, 2013, Letter Regarding Overpacking of Multiple Waste Streams in a Single Payload Container WIPP Hazardous Waste Facility Permit EPA I.D. Number NM 4890139088

The Waste Isolation Pilot Plant (WIPP) Hazardous Waste Facility Permit (Permit) Part 2, Section 2.3.3., presents the treatment, storage, and disposal facility waste acceptance criteria (TSDF-WAC) for the WIPP facility. The Permit Part 2, Section 2.3.3.4., prohibits incompatible waste to be accepted at the WIPP facility for storage, management, or disposal. Specifically, the Permit Part 2, Section 2.3.3.4., states *Waste incompatible with backfill, seal and panel closures materials, container and packaging materials, shipping container materials, or other waste are not acceptable at WIPP*. This criterion specifically prohibits waste that is not compatible with other waste at the WIPP facility. The evaluation of compatibility is not affected by the overpacking of multiple waste streams into a single payload container, even if the inner containers are damaged. All waste accepted at the WIPP facility must be compatible with all other waste, regardless of whether waste from multiple waste streams is overpacked into a single container or not. This is one of the reasons why there is no impact on the Permit with regard to implementation of overpacking containers from different waste streams into a single payload container.

As documentation of chemical compatibility of waste streams with one another, an updated chemical compatibility evaluation (**Chemical Compatibility of Transuranic Waste Streams**, Revision 0, September 2012) for existing, projected, and approved TRU waste streams was performed in 2012. The updated compatibility evaluation was included as Appendix D to the Class 2 Permit modification request (PMR), **Modify the Excluded Waste Prohibition**, submitted to NMED on April 9, 2013. This evaluation demonstrated the chemical compatibility across all existing, projected, and approved TRU waste streams, waste packaging materials and containers, backfill material, and fire suppressant materials used in the WIPP underground. The compatibility evaluation considered the list of allowed Environmental Protection Agency (EPA) hazardous waste numbers (HWNs) in the Permit, along with other sources of information. When a waste stream profile form (WSPF) is reviewed for approval, the Permittees verify that a determination of compatibility has been performed (see enclosed WP 08-NT.03, **Waste Stream Profile Form Review and Approval Program**). This ensures that only waste that meets compatibility requirements of the Permit are allowed to be shipped to the WIPP facility for storage, management, and disposal.



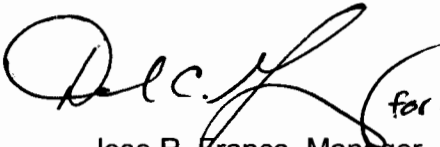
On a broader scale, chemical compatibility requirements extend beyond the requirements of the Permit. The transportation program also imposes chemical compatibility requirements, and the evaluation of chemical compatibility is conducted as described in DOE/WIPP-02-3122, **Transuranic Waste Acceptance Criteria for the Waste Isolation Pilot Plant (WIPP-WAC)**. All direct load payload containers or inner containers overpacked into a payload container must be assigned a TRU Waste Content (TRUCON) code in order to be shipped to the WIPP facility for disposal. The chemical constituents on the chemical list associated with each TRUCON code are evaluated for compliance with the list of allowable materials for the appropriate waste material type (e.g., solid inorganic materials, solid organic materials, solidified organics, etc.). Only TRUCON codes with chemical lists that have been evaluated by this process and determined to be compatible are approved for disposal at the WIPP facility. The restriction imposed on the chemical constituents of the TRUCON codes further ensures compliance with the compatibility requirements.

The final verification of waste compatibility is performed using the WIPP Waste Data System (WDS). The WDS uses edit limit checks to ensure that only containers with approved WSPFs, respective EPA HWNs, and TRUCON codes can be certified for shipment to the WIPP facility. This verification is performed on the containers being certified for shipment. For overpack containers, each inner container is certified, and therefore, chemical compatibility is verified as required by the WIPP-WAC and the Permit Attachment C, Section C-5a(2).

We certify under penalty of law that this document and all attachments were prepared under our direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on our inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of our knowledge and belief, true, accurate, and complete. We are aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

If you have any questions, please contact Mr. George T. Basabilvazo at (575) 234-7488.

Sincerely,

  
 Jose R. Franco, Manager  
 Carlsbad Field Office

*for Jose R. Franco*

  
 M. F. Sharif, Project Manager  
 Nuclear Waste Partnership LLC

Enclosure

cc: w/enclosure  
 T. Blaine, NMED \* ED  
 T. Kliphuis, NMED ED  
 CBFO M&RC  
 \*ED denotes electronic distribution

WP 08-NT.03  
Revision 14

# Waste Stream Profile Form Review and Approval Program

Cognizant Section: Waste Data System and CCP Engineering

Approved By: Curtis Chester



*A URS-led partnership with B&W and AREVA*

**Waste Stream Profile Review and Approval Program  
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**CHANGE HISTORY SUMMARY**

<b>REVISION NUMBER</b>	<b>DATE ISSUED</b>	<b>DESCRIPTION OF CHANGES</b>
12	12/29/10	<ul style="list-style-type: none"> <li>• Section 1.0: Updated the definition of a waste stream to align with the revised definition in the HWFP.</li> <li>• Section 3.0: Removed discussion regarding verification of waste compatibility using Appendix C1 of the RCRA Part B Permit Application (DOE, 1997).</li> <li>• Section 4.0: Updated criteria that describe two of the verification checks performed by the DA.</li> <li>• Section 11.0: Inserted a reference to the ATWIR Report. Global: Updated citations to attachments from the HWFP.</li> </ul>
13	01/02/13	<ul style="list-style-type: none"> <li>• Editorial changes in accordance with MD 1.1.</li> <li>• Updated review criteria in section 7.0.</li> </ul>
14	04/09/13	<ul style="list-style-type: none"> <li>• Updated review criteria in sections 1.0 through 8.0 to incorporate new Hazardous Waste Facility Permit requirements for waste characterization methods.</li> <li>• Deleted Section 5.0, Review Criteria for Statistical Evaluations.</li> </ul>

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**ABBREVIATIONS/ ACRONYMS**

AK	Acceptable Knowledge
CBFO	Carlsbad Field Office
CFR	<i>Code of Federal Regulations</i>
CH	Contact-Handled
CIS	Characterization Information Summary
DA	Data Administrator
DOE	U.S. Department of Energy
DRR	Document Review Record
EPA	U.S. Environmental Protection Agency
HWFP	Hazardous Waste Facility Permit
HWN	Hazardous Waste Number
ID	Identification
NMED	New Mexico Environment Department
NWP	Nuclear Waste Partnership LLC
QA	Quality Assurance
RCRA	Resource Conservation and Recovery Act
RES	Regulatory Environmental Services
RH	Remote-Handled
TRAMPAC	TRUPACT-II Authorized Methods for Payload Control
TRU	Transuranic
TRUCON	Transuranic Content (Codes)
TRUPACT-II	Transuranic Package Transporter-II
TSDf	Treatment, Storage, and Disposal Facility
VE	Visual Examination
WAC	Waste Acceptance Criteria
WAP	Waste Analysis Plan
WDS	Waste Data System
WIPP	Waste Isolation Pilot Plant
WITS	Waste Information Tracking Systems
WSPF	Waste Stream Profile Form
WWIS	WIPP Waste Information System

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## **1.0 INTRODUCTION <sup>1</sup>**

This document summarizes the applicable requirements and criteria for Waste Isolation Pilot Plant (WIPP) review and approval of Waste Stream Profile Forms (WSPFs) that are prepared by the U.S. Department of Energy (DOE) Transuranic (TRU) Waste Generator/Storage Sites (DOE Sites) and submitted to the Permittees for approval. Each WSPF package submitted for approval must meet the applicable requirements described in the Hazardous Waste Facility Permit (HWFP) Waste Analysis Plan (WAP) and the WIPP Waste Acceptance Criteria (WAC) (DOE/WIPP 02-3122, *Transuranic Waste Acceptance Criteria for the Waste Isolation Pilot Plant*).

Characterization requirements for individual containers of TRU mixed waste are specified on a waste stream basis. A waste stream is defined as waste materials that have common physical form, contain similar hazardous constituents, and are generated from a single process or activity.

This document describes the processes for internal distribution of each WSPF package to the reviewers, the criteria used by each reviewer to assess each WSPF package, and the processes that are used for transmittal of comments and comment resolution.

Each WSPF package is reviewed in accordance with this document to verify that the information provided is complete and accurate, and that the waste stream complies with the WAC and the WAP prior to approval. In the event more detailed information is required by a WSPF reviewer during conduct of the review, the DOE Site will be requested to provide a Waste Stream Characterization Package that supports waste characterization determinations. Additionally, chemical sampling and analysis data consisting of a sampling and analysis plan, EPA SW-846 (or equivalent) test methods, and identification of the laboratory to be used for the analysis may be requested. The option for the Permittees to request additional information ensures that the waste being offered for disposal is adequately characterized and accurately described on the WSPF.

## **2.0 REQUIREMENTS**

After a complete Acceptable Knowledge (AK) record has been compiled and either a Determination Request has been approved by DOE or the generator/storage site has completed the applicable testing requirements, the DOE site will complete a WSPF and Characterization Information Summary (CIS) and submit them to the Permittees for review.

All data necessary to check the accuracy of the WSPF will be transmitted to the Permittees for verification. . Prior to the first shipment of containers from the approved waste stream, the approved WSPF and accompanying CIS will be provided to the New Mexico Environment Department (NMED).

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If discrepancies regarding hazardous waste number (HWN) assignment or waste matrix code designation arise as a result of the WIPP WSPF review, the DOE Site will be contacted and required to provide the necessary additional information to resolve the discrepancy before that waste stream is approved for disposal at the WIPP facility. The Permittees will notify NMED of any discrepancies identified during WSPF Review and the resulting discrepancy resolution prior to waste shipment. Containers from the waste stream will not be managed, stored, or disposed of until this discrepancy is resolved in accordance with the WAP (WAP Section C-5a).

**2.1 Transmittal From DOE Site to the Permittees**

The WSPF and the CIS for the waste stream shall be transmitted to the Permittees from the DOE Site.

To implement this requirement, sites will transmit each WSPF electronically to [site.documents@wipp.ws](mailto:site.documents@wipp.ws).

**2.2 Distribution From the Carlsbad Field Office to Regulatory Environmental Services**

Carlsbad Field Office (CBFO) and designated WIPP contractor personnel who are responsible for distributing documents that are electronically submitted to the CBFO by the DOE Sites will forward the WSPF submittal to Regulatory Environmental Services (RES). RES management will designate an individual to coordinate the review. Hereafter, this individual is referred to as the WSPF Review Coordinator.

**2.3 Distribution From RES to Reviewers**

The WSPF Review Coordinator electronically distributes the WSPF package via email to Nuclear Waste Partnership LLC (NWP) Central Characterization Program Waste Information Tracking Systems (WITS), and designated Technical Specialists for review. The coordinator should verify that each team member received the WSPF package to be reviewed.

The reviews of WSPF packages will be conducted using a document review record (DRR) form (e.g., CBFO Form 4.2-2). WSPF packages are reviewed by RES, NWP, and others on behalf of the Permittees.



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**3.0 REVIEW OF THE WASTE STREAM PROFILE FORM**

Reviewers will compare the radiographic and visual examination (VE) data obtained subsequent to submittal and approval of the WSPF with characterization information presented in the WSPF package. If the reviewers determine (through the data comparison) that the characterization information is adequate, the WSPF will be approved. If the data comparison indicates that analyzed containers have hazardous wastes not present on the WSPF, or a different waste matrix code applies, the WSPF is in error and shall be resubmitted.

For waste streams that do not have an AK Sufficiency Determination approved by the Permittees, the verification of waste stream will be performed by reviewing the Waste Data System (WDS) data for consistency with the WSPF package. Information contained in the AK Summary must indicate if the waste has been checked for the characteristics of ignitability, corrosivity, and reactivity. The final verification of waste compatibility will be performed using WDS.

Each reviewer performs an evaluation of the AK Summary to identify the following:

- Inconsistent presentation of information.
- Information that is deemed irrelevant to characterization of the waste stream.
- If the information presented will require additional reviews due to potential impacts to WIPP, such as safety basis or Compliance Certification Application.

If the information presented in the AK Summary is unclear or leaves any doubt about the waste stream meeting the applicable WIPP requirements, the reviewer will request the DOE Site to clarify the discussion and provide additional objective evidence to justify why the entire waste stream (generated and projected) meets all the WIPP requirements.

Development of a checklist to ensure compliance with the review criteria identified in the sections below will be at the discretion of the department managers and/or the individuals assigned to perform the WSPF review. Reviewers should use the criteria in sections 4.0, 5.0, and 6.0 of this document to perform their reviews and provide results of their evaluations and comments to the WSPF Review Coordinator.

**4.0 REVIEW CRITERIA FOR THE DATA ADMINISTRATOR**

The WDS includes all of the elements that were implemented in the WIPP Waste Information System (WWIS) to meet regulatory requirements for the operation of WIPP. The WWIS is a subset of the WDS. For waste streams that do not have an AK Sufficiency Determination approved by the Permittees, as part of the waste characterization data submittal, the DOE Site will transmit the data on a container basis

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to the WDS. This data submittal can occur at any time as the data are being collected, but will be complete for each container prior to shipment of that container. The initial WSPF check performed by the Permittees will include data submitted by the DOE Site for each container and the CIS. The database provides the waste container data necessary to support the review of the WSPF.

Upon receipt of the WSPF package, or upon notification from the DOE Site, the Data Administrator (DA) will enter the required information into the WSPF Administrative Table that will allow submittal of waste container data by the shipper generator user to the Characterization Module. The DA will update other Administrative Tables that may be applicable to the waste stream, as required, to facilitate successful data submittal to the database. If the container data have not been submitted to the database, the DA will notify the WSPF Review Coordinator. The DA performs a data query and supplies the output data to the WSPF Review Coordinator and any other reviewer who requests it. The DA uses the WSPF and the CIS reports to perform the review of the WSPF package. The waste container data reports for each waste stream are provided to the WSPF Review Coordinator for inclusion in the operating record file.

At a minimum, the DA performs the following verification checks for each container submitted to the database:

- Verify that the Generator Site U.S. Environmental Protection Agency (EPA) identification (ID) on the WSPF matches the data in the Sites Reference Table.
- Verify that the Container ID numbers reported on the Correlation to Batch Data Report Form in the CIS have been reported to the database.
- Verify that the EPA HWNs reported on the WSPF match the HWNs reported to the database.
- Verify that the waste material parameters shown on the WSPF aligns with the waste material parameters reported to the database.
- Verify that the waste stream ID numbers (from the *Annual Transuranic Waste Inventory Report* [DOE/TRU-09-3425]) match the BIR ID numbers reported to the database.
- Verify that the assay methods and characterization methods identified in the most recent CBFO certification letter correlate with container data submitted to the database.

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**5.0 CRITERIA FOR RCRA REVIEW OF WSPF PACKAGES**

The RCRA reviewer performs a review of the WSPF, the CIS, and the AK Summary applicable to the waste stream in accordance with this document. RCRA reviewers may use the waste container data from the database, when needed, to perform the review of the WSPF package. In accordance with RES instructions and procedures, the RCRA reviewer will verify that information submitted in the WSPF package meets the applicable requirements of the WAP and applicable portions of Title 40 *Code of Federal Regulations* (CFR) Part 261, "Identification and Listing of Hazardous Waste."

At a minimum, the RCRA reviewer should perform the following evaluations:

- Verify that the applicable requirements of the TDSF WAC have been met, the ten WIPP-tracked radionuclides are discussed or listed, and the two most prevalent TRU radionuclides (Contact-Handled waste only) are identified.
- If the waste stream includes polychlorinated biphenyls (PCBs), verify that the generator site is authorized to ship PCB-containing wastes to the WIPP.
- Verify that the WSPF, CIS, and other requested information are complete and accurate, (Information required by the HWFP is specified in Attachment C3, Sections C3-6b(1) and C3-6b(2), and Section C3-6b(3).) and other required/requested information has been provided by the DOE Site.
- Examine the assignment of the waste stream description, Waste Matrix Code Group, and Summary Category Group, the results of waste analyses (as applicable), the acceptable knowledge summary documentation, the methods used for characterization, the CBFO certification, and appropriate designation of EPA HWNs.
- Review the CIS to verify that the waste has been classified correctly with respect to assignment of HWNs.
- Verify that the AK Summary is complete and that the summary category group and the waste matrix code group on the WSPF are supported by the waste stream name and the AK Summary description.
- Verify that the EPA HWNs listed on the WSPF are consistent with the HWNs discussed in the AK Summary.
- Verify that the AK Summary adequately indicates that the waste has been checked for the characteristics of ignitability, corrosivity, and reactivity, and that justifications for not adding D001, D002, and D003 EPA HWNs are included. Verify that the justifications are defensible and technically correct.

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- Verify that the AK Summary provides adequate justification for assignment of EPA HWNs and that the justifications are supported with technically correct AK information.
- Verify that the EPA HWNs listed on the WSPF are as identified/permitted in the HWFP Attachment C, Table C-5.
- If any waste stream is assigned the EPA HWN U134 (hydrofluoric acid), verify that an indication has been provided in the CIS that no liquid is present in the waste.
- Verify, when applicable, that the VE/Real-Time Radiography Summary (Exclusion of Prohibited Items) documents the absence of prohibited items.
- Verify, when applicable, that the initial site certification letter for the summary category group has been issued by the CBFO and that recertification dates are valid.
- Review the most current CBFO certification letter to verify that processes listed under Certification Program Status cover the waste stream and the procedures that are either described or listed in the WSPF package.
- Verify that the cover sheet of the Waste Container Data report printout is signed and dated.

## **6.0 CRITERIA FOR TRANSPORTATION REVIEW OF WSPF PACKAGES**

The NWP Packaging Implementation and Technical Support group will review the transportation aspects of WSPF including chemical compatibility, gas generation, isotopic inventory, and nuclear safety. The NWP Packaging Implementation and Technical Support group will also review the WSPFs to ensure that the waste described meets the identified Transuranic Content (TRUCON) Code(s) (DOE/WIPP-01-3194, *CH-TRU Waste Content Codes [CH-TRUCON]*; DOE/WIPP-90-045, *Remote-Handled Transuranic Content Codes [RH-TRUCON]*; or DOE/WIPP-11-3458, *TRUPACT-III Content Codes [TRUCON-III]*). When applicable, NWP Transportation Payload Engineers will assist the sites with revisions to current TRUCON Codes.

At a minimum, transportation will perform the following:

- Verify that the waste described in the WSPF Package meets the identified CH-TRUCON, RH-TRUCON, and TRUPACT-III (TRUCON-III) TRUCON Code(s).

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- Review the WSPF for isotopic information and packaging materials/waste components including the presence of reflectors or moderators that have nuclear safety implications.
- Review the WSPF for applicable shipping category(ies), if necessary.
- Review the WSPF for chemical consistency with the TRUCON Code(s).
- Review the WSPFs that include tritium isotopic waste to ensure a thermal wattage evaluation is completed and in compliance with the TRAMPAC (TRUPACT-II Authorized Methods for Payload Control).
- Review the WSPF for other transportation related requirements, as necessary.
- Verify that the WSPF documents the absence of prohibited items related to payload compliance.
- If the waste stream contains residual amounts of beryllium, verify that the AK Summary provides a conclusion that the waste stream contains <1% beryllium by weight. If the waste stream contains >1% beryllium by weight, verify that the AK Summary provides a conclusion that the waste stream contains >1% beryllium by weight and verify that a TRUCON Code has been developed and approved that limits the waste containers to the appropriate Fissile Gram Equivalent limit per applicable TRAMPAC document.
- If the WSPF or the supporting acceptable knowledge documentation describes the presence of carbon, deuterium, magnesium oxide, and/or depleted uranium in quantities >1% by weight, ensure that the TRUCON code assignment and waste stream combination has been evaluated to determine that the material is incapable of acting as a special reflector. If it is determined that these materials are capable of acting as such in the waste form, the WSPF describing the waste cannot be approved.

**7.0 COLLECTION, EVALUATION, CONSOLIDATION, AND TRANSMITTAL OF WSPF REVIEW COMMENTS**

**7.1 Collection, Evaluation, and Consolidation of WSPF Review Comments**

On or after the established due date for transmittal of comments to the DOE Site, the WSPF Review Coordinator collects comments from all reviewers.

The WSPF Review Coordinator evaluates all comments for validity and clarity.

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The WSPF Review Coordinator may recommend removal of any comment found to be not applicable (e.g., the comment is addressed elsewhere, is in error, or the information is not required).

The WSPF Review Coordinator may reword or reformat comments that will not provide an appropriate level of clarity to be properly addressed by the DOE Site.

The WSPF Review Coordinator may combine similar comments into one.

When a comment is reworded, reformatted, or removed, the WSPF Review Coordinator will notify the reviewer. Alternatively, if comments are identified that require removal or rework, the WSPF Review Coordinator may schedule and conduct a meeting with the review team members to discuss the comments.

If there are no comments from any of the reviewers, a DRR stating that there were no comments will be developed and transmitted to the authorized approving manager along with the WSPF package.

## **7.2 Transmittal of Comments**

The WSPF Review Coordinator will transmit the comments to the DOE Site electronically via [site.documents@wipp.ws](mailto:site.documents@wipp.ws).

## **7.3 Comment Resolution**

A teleconference may be scheduled to discuss the comments with the DOE Site. The review team, NWP management, RES management, and CBFO personnel may be invited to participate in review meetings or teleconferences. If the review team is made aware of any programmatic schedule issues that may arise from the need to develop extensive changes to the WSPF package, NWP, and RES management will be notified.

Upon receipt of comment resolutions and a revised WSPF package that incorporates resolutions to the comments, the WSPF Review Coordinator will obtain concurrence from each reviewer that each comment has been adequately resolved.

In cases where a comment that is also defined as a discrepancy is not resolved to the satisfaction of the review team, a recommendation(s) may be provided to RES management to impose restrictions that are applicable to the unresolved discrepancy in the approval letter for the waste stream. Such restrictions may allow only a portion of the containers from a waste stream to be certified and shipped until such time that the discrepancy is resolved.

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**7.4 Acceptance of Approved WSPF**

Prior to the first shipment of containers from the approved waste stream, the Permittees will provide copies of the approved WSPF and accompanying CIS to the NMED. Upon written notification of approval of the WSPF by the Permittees, the DOE Site is authorized to ship waste to WIPP. Upon receipt of the Permittees' approval letter for the waste stream, the DA enters the approval date into the WSPF Administrative Table, which causes the database to recognize the approved waste stream profile number. This allows the shipper generator WDS user to submit certification data to the WDS for waste containers from the approved waste stream and subsequently allows DA approval of certified container data prior to shipment of containers from the approved waste stream.

**8.0 REVIEW OF CHANGE NOTICES AND REVISIONS TO WSPF PACKAGES**

When a DOE Site needs to make administrative changes to an approved WSPF package, they shall submit a "Change Notice" or a revised WSPF package to [site.documents@wipp.ws](mailto:site.documents@wipp.ws). Changes that could affect data quality must be submitted as a new revision to the approved WSPF and shall undergo the same review as the original package.

**8.1 Examples of Administrative Changes**

Examples of administrative changes include, but are not limited to, the following:

- Changes to add or change material parameter weight estimates per unit of waste and the method for determining waste material parameter weights per unit of waste.
- Changes to a waste matrix code that encompasses the code in the approved WSPF (e.g., change S5410 to S5400).
- Revisions to estimated numbers of waste containers.
- Applicable TRUCON Codes (i.e., addition of new packaging configurations to existing TRUCON Codes that have been approved and have no impact to chemical compatibility as applicable to characterization, shipment or disposal of the waste).
- Changes to the AK Summary that have no impact related to RCRA characterization of the waste, generation processes, and radionuclide information as presented in the approved WSPF package.

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**8.2 Distribution and Review of Change Notices or Revisions to WSPF Packages**

Upon receipt of a Change Notice or WSPF package revision, the WSPF Review Coordinator or designee will provide both the approved WSPF package and the change notice or revision to the designated reviewers. Change notices will be reviewed using the following steps:

- The reviewers will perform a comparison of the described changes with the approved WSPF package.
- The reviewers will verify that each administrative change, as described in the change notice, does not qualify as a data quality-affecting change that requires a revision to the WSPF package.
- The reviewers will verify that the DOE Site has provided a reason for each administrative change with justification as to why a new WSPF package or a revision to the approved package should not be required.
- The reviewers will assess the impacts, if any, that the change(s) will have to the approved characterization information and conclude that the requested change(s) do not create a discrepancy that is directly related to information contained in the approved WSPF package.
- The reviewers will verify that the DOE Site has provided the certification statement.

WSPF package revisions will be reviewed in accordance with the requirements for WSPF package review in this document.

**8.3 Approval of Change Notices**

If the information contained in the Change Notice is complete and meets all of the applicable criteria for an administrative change, the Permittees will provide written notification to the DOE site, and the documentation will be provided to Site Environmental Compliance for inclusion in the operating record file.

If the Change Notice is determined to be data quality affecting, refer to Section 8.4.

**8.4 Data Quality Affecting Changes and Revisions to WSPF Packages**

If it is determined that the requested change(s) to a WSPF is data quality affecting in nature, the WSPF Review Coordinator will notify the DOE Site to prepare a revision to the WSPF package and resubmit the entire package to the Permittees for distribution to the WSPF reviewers.



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Examples of data quality-affecting changes include, but are not limited to, the following:

- Waste Matrix Code Group designation
- Significant Changes to the CIS
- Changes to the AK Summary that have impact related to RCRA characterization of the waste, changes in generation processes, and radionuclide information as presented in the approved WSPF package
- Addition of EPA HWNs

#### **9.0 RECORDS MANAGEMENT**

Implementation of this process will generate the following records that are compiled in a file by the WSPF Review Coordinator:

- WSPF
- CIS (including a complete AK Summary)
- WDS Waste Container Data Reports, if applicable
- A consolidated list of review comments and comment resolutions
- Waste Stream Characterization Package (when requested) and any additional documentation requested for completion of the WSPF package review
- Letter to the DOE Site indicating approval of the WSPF package
- Transmittal letter to the NMED

When the file is complete, it will be forwarded to Site Environmental Compliance maintained in the WIPP facility operating record, and be available for inspection by the NMED. These records from submittals of WSPF packages and from performance of WSPF reviews will be retained in accordance with the Site Environmental Compliance Records Inventory and Disposition Schedule.

**Waste Stream Profile Review and Approval Program  
WP 08-NT.03, Rev. 14**

<b>REFERENCES</b>	
DOCUMENT NUMBER AND TITLE	KEY STEP
Hazardous Waste Facility Permit, EPA Identification No. NM4890139088, Attachment C, Waste Analysis Plan, applicable sections	
Title 40 <i>Code of Federal Regulations</i> Part 261, <i>Identification and Listing of Hazardous Waste</i> , applicable sections	
DOE/WIPP-90-045, <i>Remote-Handled Transuranic Waste Content Codes</i>	
DOE/WIPP-01-3194, <i>CH-TRU Waste Content Codes</i>	
DOE/WIPP-02-3122, <i>Transuranic Waste Acceptance Criteria for the Waste Isolation Pilot Plant</i>	1
DOE/WIPP-09-3452, <i>Annual Transuranic Waste Inventory Report – 2009</i>	
WP 15-PS3002, <i>Controlled Document Processing</i>	