

United States Government



Department of Energy

memorandum

 Carlsbad Field Office
 Carlsbad, New Mexico 88221
RECEIVED

DATE: MAR - 3 2014

REPLY TO
ATTN OF: CBFO:NTP:JRS:GL:14-1804:UFC 5900.00

SUBJECT: Los Alamos National Laboratory – CCP Recertification Audit A-13-23

TO: Mr. Pete Maggiore, Los Alamos Site Office
 Mr. M. F. Sharif, President and Project Manager, Nuclear Waste Partnership, LLC

MAR - 3 2014

NMED
Hazardous Waste Bureau

The Carlsbad Field Office (CBFO) has completed the annual Recertification Audit A-13-23 of the Central Characterization Program (CCP) Transuranic (TRU) waste characterization activities at the Los Alamos National Laboratory (LANL) (hereinafter referred to as LANL-CCP) conducted July 23-25, 2013. The characterization, certification, quality assurance, and transportation elements of the contact-handled (CH) Summary Category Groups (SCGs) S3000 homogeneous solids, S4000 soils/gravel, and S5000 debris wastes were determined to be adequate, satisfactorily implemented, and effective.

The audit teams determined that the LANL-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 CBFO *Quality Assurance Program Document (QAPD)*, the *TRU Waste Acceptance Criteria for the Waste Isolation Pilot Plant (WIPP WAC)*, the *Contact-Handled Transuranic Waste Authorized Methods for Payload Control (CH-TRAMPAC)*, *Safety Analysis Reports*, and *Certifications of Compliance*. The audit teams determined that 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 Environmental Protection Agency (EPA), the CBFO grants continued authority at the LANL-CCP for TRU waste characterization, certification and transportation activities as identified in Table 1, Page 4 of this memorandum.

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 memorandum are the following attachments:

- *Attachment 1* describes the CCP certification program status;
- *Attachment 2* contains the list of processes/equipment from Table 1 of this memorandum certified at the site;

140308



- *Attachment 3* contains the list of CCP certified procedures/documents; and
- *Attachment 4* describes specific CCP 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 LANL-CCP shall not ship for disposal at the WIPP any wastes affected by a Tier 1 process element change without prior CBFO approval, and the CCP shall report Tier 2 changes to the CBFO on a quarterly basis.

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


Jose R. Franco, Manager
Carlsbad Field Office

Attachments (4)

cc: w/attachments

G. Basabilvazo, CBFO	* ED	R. McGinnis, NWP	ED
M. Brown, CBFO	ED	J. Morrison, NWP	ED
N. Castaneda, CBFO	ED	W. Most, NWP	ED
S. McCauslin, CBFO	ED	L. Oberbeck, NWP	ED
D. Miehl, CBFO	ED	S. Offner, NWP	ED
T. Morgan, CBFO	ED	M. Percy, NWP	ED
M. Navarrete, CBFO	ED	M. Ramirez, NWP	ED
M. Pinzel, CBFO	ED	A. Ray, NWP	ED
J. R. Stroble, CBFO	ED	R. Reeves, NWP	ED
L. Bishop, LASO	ED	T. Reynolds, NWP	ED
E. Feltcorn, EPA	ED	F. Romo, NWP	ED
R. Joglekar, EPA	ED	R. Romo, NWP	ED
T. Peake, EPA	ED	P. Schilling, NWP	ED
S. Holmes, NMED	ED	M. Sensibaugh, NWP	ED
J. Kieling, NMED	ED	F. Sharif, NWP	ED
T. Kliphuis, NMED	ED	C. Simmons, NWP	ED
R. Maestas, NMED	ED	C. Soaterna, NWP	ED
C. Smith, NMED	ED	D. Stegman, NWP	ED
V. Cannon, NWP	ED	M. Strum, NWP	ED
B. Carlsen, NWP	ED	K. Urquidez, NWP	ED
J. Carter, NWP	ED	V. Waldram, NWP	ED
C. Chester, NWP	ED	M. Valentine, NWP	ED
D. Cook, NWP	ED	R. Allen, CTAC	ED
A. Fisher, NWP	ED	V. Daub, CTAC	ED
R. Galbraith, NWP	ED	D. Sellmer, CTAC	ED
T. Groover, NWP	ED	M. Carter, LANL-CO	ED
K. Guillermo, NWP	ED	P. Gilbert, LANL-CO	ED
E. Gulbransen, NWP	ED	G. Lyshik, LANL-CO	ED
J. Haschets, NWP	ED	W. Weyerman, LANL-CO	ED
I. Joo, NWP	ED	S. Percy, Stoller	ED
R. Kantrowitz, NWP	ED	WIPP Operating Record	ED
C. Kirkes, NWP	ED	CBFO M&RC	
S. Kouba, NWP	ED	*ED denotes electronic distribution	
C. Luoma, NWP	ED		

Table 1 LANL-CCP Certified Waste Characterization Processes						
Characterization Process	CH S3000 Homogeneous Solids		CH S4000 Soils/gravel		CH S5000 Debris	
	Newly generated	Retrievably-stored	Newly generated	Retrievably-stored	Newly generated	Retrievably-stored
Acceptable Knowledge (AK)	N/A	APPROVED	N/A	APPROVED	APPROVED ¹	APPROVED
Load Management	N/A	APPROVED	N/A	APPROVED	APPROVED ¹	APPROVED
Data Validation & Verification (V&V)	APPROVED	APPROVED	N/A	APPROVED	APPROVED	APPROVED
Nondestructive Assay (NDA)	N/A	APPROVED	N/A	APPROVED	APPROVED	APPROVED
Real-time Radiography (RTR)	N/A	APPROVED	N/A	APPROVED	APPROVED	APPROVED
Visual Examination (VE)	N/A	APPROVED ²	N/A	N/A	APPROVED ¹	APPROVED
WIPP Waste Information System/Waste Data System (WWIS/WDS)	APPROVED	APPROVED	N/A	APPROVED	APPROVED	APPROVED

¹ Off-Site Source Recovery Program (OSRP) Activities-includes characterization of sealed sources for newly generated debris waste.

² In response to NMED comments on final Audit Report A-07-12 of LAN/CCP, CBFO agreed to perform a surveillance on the VE process for S3000 waste as a condition to be specified in the LANL/CCP certification letter. CBFO memorandum CBFO:QA:DSM:GS:08-0279:UFC 2300.00 dated April 9, 2008,

* Characterization Processes in this Table may not be completely listed in Attachment 2.

* RH S5000 Debris (LA-MHD03.002 16 RH 72B canisters) were certified on April 30, 2009 and shipped.

**CENTRAL CHARACTERIZATION PROJECT
CERTIFICATION PROGRAM STATUS
AT Los Alamos National Laboratory**

The CBFO Director of the Office of the National TRU Program and the CBFO Director of Quality Assurance have evaluated the documentation supporting the compliance of the Central Characterization Project (CCP) TRU waste program deployed at the Los Alamos National Laboratory (LANL) (hereinafter referred to as LANL-CCP).

PROGRAM STATUS

- All program elements remain complete.
 - The following site documents demonstrate how the CCP complied with the CBFO requirements*:
 - **CCP-PO-001, Revision 21, CCP Transuranic Waste Characterization Quality Assurance Project Plan**
Memorandum CBFO:NTP:JRS:PG:13-0487:UFC 5900.00 approved April 17, 2013;
 - **CCP-PO-002, Revision 27, CCP Transuranic Waste Certification Plan QAP – Section 4.0 of CCP-PO-002**
Memorandum CBFO:NTP:JRS:PG:13-0593:UFC: 5900.00 approved May 31, 2013;
and
 - **CCP-PO-003, Revision 13, CCP Transuranic Authorized Method for Payload Control**
Memorandum CBFO:NTP:JRS:GL:13-0671:UFC 5900.00 approved July 29, 2013.
- *Note that the program documents listed above are the current revision and may not be the revision that was audited.
- Certified Systems – see Attachment 2 List of Processes/Equipment from Table 1 of this memorandum that are certified and used by the CCP at the LANL.
 - Standard Operating Procedures – see Attachment 3 for the complete list of certified procedures/documents used by the CCP at the LANL.
 - Tiering of the CH TRU Waste Characterization Processes – see Attachment 4 for the implementation by CCP at LANL (based on EPA Baseline Inspections).

- CCP participated in the following performance demonstration program (PDP)*:
 - **NDA PDP - Cycle 20A approval** for radioassay of TRU waste drums by using the High Efficiency Neutron Counter 1 (HENC1) (LA06/LAN5) and HENC2 (LA07/LAN6). Memorandum CBFO:NTP:BM:CC:13-0643:UFC 5900.00 dated July 10, 2013.
 - **NDA PDP – Cycle B12A approval** for radioassay of TRU waste in standard waste boxes by using the SuperHENC (LA08/LAN7). Memorandum CBFO:NTP:MRP:GL:12-0710:UFC 5822.00 dated December 20, 2012.
 - **NDA PDP – Cycle 20A approval** for radioassay of TRU waste drums by using the MILCC (LA09/LAG2). Memorandum CBFO:NTP:MB:CC:13-0651:UFC 5822.00 dated July 15, 2013.
 - **NDA PDP – Cycle 12C approval** for radioassay of TRU waste in SWBs using the MILCC (LA09/LAG2) Memorandum CBFO:NTP:MB:CC:13-0652:UFC 5822.00 dated July 15, 2013.
- ***Note that the PDP cycles listed above are the current revision and may not be the revision that was audited.**
- CBFO conducted Recertification Audit A-13-23 of the LANL-CCP on July 23-25, 2013.
 - The Interim Audit Report was issued on August 15, 2013.
 - CAR 13-051 was issued on August 1, 2013.
 - CAR 13-051 was closed on October 22, 2013.
 - The Final Audit Report was issued to NMED on November 4, 2013.
 - The NMED approval was issued on December 20, 2013.
- CBFO conducted Audit A-13-19 on July 9-11, 2013 of the INL-CCP Analytical Laboratories for closeout of characterization and certification activities for *headspace gas analysis* of SCG S5000 and *solids analysis* of SCGs S3000 and S4000.
 - The Interim Audit Report was issued on August 8, 2013.
 - The Final Audit Report was issued to NMED on November 4, 2013.
 - The NMED approval on Audit A-13-19 was issued on December 10, 2013.
- CBFO conducted a Quality Assurance Program Audit A-13-11 on April 16-18, 2013.
 - CARs 13-024, 13-025, and 13-026 were issued on April 29, 2013.
 - CAR 13-024, CAR 13-025, CAR-026 were issued on April 29, 2013.
 - CAR 13-024 was closed on May 22, 2013.
 - CAR 12-025 was closed on May 29, 2013.
 - CAR 12-026 was closed on May 29, 2013.
 - The Audit Report was issued on May 31, 2013.
- CBFO conducted Audit A-13-03 of the CCP CH and RH transportation activities on December 4-6, 2012.
 - The Audit Report was issued on January 23, 2013.
- EPA issued concurrence on the draft recertification memorandum on February 18, 2014.

RECOMMENDATION

The recommendation to the CBFO Manager is for CCP at the LANL to continue the authority for TRU waste characterization, certification, and transportation activities of Contact-Handled Summary Categories S3000 homogeneous solids, S4000 soils/gravel; and S5000 debris waste. 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 CCP at LANL.

CONCURRENCE

M. Brown, Director
Office of Quality Assurance

2/14/2014
Date



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

2-13-14
Date

CENTRAL CHARACTERIZATION PROJECT					
List of Processes/Equipment Certified from Table 1 of Mamp at Los Alamos National Laboratory					
WIPP WWIS #	Site Equipment # or Title	Description	Components	Software	Calibration
Non-destructive Assay					
11HC1	HENC1	<p>Canberra Industries High Efficiency Neutron Counter mounted in a transportation container.</p> <p>Approved for analysis of drums.</p> <p>As identified in CCP-TP-063, CCP-TP-064, and CCP-TP-103</p>	<ul style="list-style-type: none"> • Cadmium gamma ray filter and the Add-A-Source (AAS) • Canberra Neutron Multiplicity Counter • Canberra Digital Signal Processor • (1) Broad range HPGe detector • Pulser • Analysis equipment 	<ul style="list-style-type: none"> • Canberra NDA 2000 • Genie 2000 • Multi Group Analysis (MGA) Isotopics • Fixed-energy Response function Analysis with Multiple efficiencies (FRAM) 	<p><i>Lead-lined Calibration Report for the HENC#1 Including Passive Neutron and Gamma Spectrometer MCS-HENC#1-NDA-1005-Lead-Lined, Rev. 1 describes the operating ranges and methods. The acceptable ranges are: Passive neutron; LLD to 16.28 g ²⁴⁰Pu_{eff} for multiplying waste streams, LLD to 35.0 g ²⁴⁰Pu_{eff} for non-multiplying waste streams, and Gamma; LLD to 217g of Weapons Grade Pu limited by dead time. Acceptable density range for gamma is 0.03 – 2.15 g/cc for lead-lined containers. The Calibration Report for the HENC#1 Including Passive Neutron and Gamma Spectrometer Calibration and Confirmation MCS-HENC#1-NDA-1002, Rev. 6 specifies the same limits except drums without lead-liners have a density range from 0.018g/cc to 2.1 g/cc. The Total Measurement Uncertainty estimates are described in Total Measurement Uncertainty for the MCS HENC#1 With Integral Gamma Spectrometer, CI-HENC-TMU-101 Rev. 3.</i></p>
11HC2	HENC2	<p>Canberra Industries High Efficiency Neutron Counter mounted in a trailer.</p> <p>Approved for analysis of drums.</p> <p>As identified in CCP-TP-063, CCP-TP-064, and CCP-TP-103</p>	<ul style="list-style-type: none"> • Tin/Copper gamma ray filter and the Add-A-Source (AAS) • Canberra Neutron Multiplicity Counter • Canberra Digital Signal Processor • (1) Broad range HPGe detector • Pulser • Analysis equipment • JSR-14 	<ul style="list-style-type: none"> • Canberra NDA 2000 • Genie 2000 • Multi Group Analysis (MGA) Isotopics • Fixed-energy Response function Analysis with Multiple efficiencies (FRAM) 	<p><i>Lead-Lined Calibration Report for the HENC #2 Including Passive Neutron and Gamma Spectrometer Document # LANL-NDA-1003-Lead-lined Rev 3 describes the operating ranges and methods for assaying lead-lined 55-gal drums with the HENC #2 at Los Alamos National Laboratory. For lead-lined drums, the acceptable range for multiplying waste streams measured by passive neutron analysis is LLD to 16.28 g ²⁴⁰Pu_{eff}. For non multiplying waste streams measured by passive neutron analysis, the range is LLD to 35.0 g ²⁴⁰Pu_{eff}. For gamma measurements, the operating range is LLD to 325 g of total plutonium for weapons grade Pu and LLD to 27 g of total plutonium for heat source Pu limited by dead time. The acceptable density range for gamma measurements is 0.03 to 2.15 g/cc for lead-lined containers. The Calibration Report for the HENC#2 Including Passive Neutron and</i></p>

CENTRAL CHARACTERIZATION PROJECT					
List of Processes/Equipment Certified from Table 1 of Memo at Los Alamos National Laboratory					
WIPP WWIS #	Site Equipment # or Title	Description	Components	Software	Calibration
					<i>Gamma Spectrometer Calibration and Confirmation HENC#2-NDA-1002, Rev. 3 specifies the same limits except drums without lead-liners have a density range from 0.018g/cc to 2.1 g/cc. Any lead-lined drum below 2 grams of total Pu will require extended EA review. The Total Measurement Uncertainty estimates are described in Total Measurement Uncertainty for the HENC#2 With Integral Gamma Spectrometer, CI-HENC2-TMU-101 Rev. 2.</i>
11SHC1	SHENC	Super High Efficiency Neutron Counter mounted in a trailer. Approved for analysis of SWBs. As identified in CCP-TP-059, CCP-TP-064, and CCP-TP-103	<ul style="list-style-type: none"> • Tin/Copper gamma ray filter and the Add-A-Source (AAS) • Neutron Multiplicity Counter • JSR-15 • Digital Signal Processor • (1) Broad range HPGe detector • Pulser • Analysis equipment 	<ul style="list-style-type: none"> • NDA 2000 • Genie 2000 • MultiGroup Analysis (MGA) Isotopics • Fixed-Energy Response function Analysis with Multiple efficiencies (FRAM) 	<i>Calibration Report for the SuperHENC at Los Alamos National Laboratory including Passive Neutron and Gamma Spectrometer Calibration and Confirmation, LANL-SHENC3-NDA-1004 Rev. 4 describes the operating ranges and methods. The acceptable ranges are: Passive neutron: LLD to 34.0 grams ²⁴⁰Pu_{eff} for all waste streams. Gamma: LLD to 325g of Total Pu limited by dead time. Acceptable density range for gamma is approximately 0.00-2.50 g/cc. The Total Measurement Uncertainty estimates are described in Total Measurement Uncertainty for the Los Alamos SuperHENC with Gamma Spectroscopy, CI-SHENC-TMU-102 Rev. 3.</i>
11MILCC1	MILCC	Mobile ISOCs Large Container Counter (MILCC) Approved for 55-gallon drums, SWBs, CMBs As identified in CCP-TP-076, CCP-TP-077, and CCP-TP-103	<ul style="list-style-type: none"> • ISOCs rails and collimator sets (2) • ISOCs carts (2) • Signal cables • Canberra InSpector 2000 (2) 	<ul style="list-style-type: none"> • NDA 2000 • Genie 2000 • Multi Group Analysis (MGA) Isotopics • ISOCs-In Situ Object Counting Software 	<i>Calibration Report for the Mobile ISOCs Large Container Counter (MILCC) at Los Alamos National Laboratory Including Gamma Spectrometer Calibration and Confirmation, describes the operating ranges and methods. The acceptable range is LLD to 325 grams of Total Pu limited by dead time. Acceptable density range for gamma is approximately 0.0 – 2.50 g/cc.</i>

CENTRAL CHARACTERIZATION PROJECT					
List of Processes/Equipment Certified from Table 1 of Memo at Los Alamos National Laboratory					
WIPP WWIS #	Site Equipment # or Title	Description	Components	Software	Calibration
Non-destructive Examination					
11RR2	RTR2	Real-Time Radiography Mobile Characterization System RTR [built by VJ Technologies] As identified in CCP-TP-053 and CCP-TP-028	<ul style="list-style-type: none"> • Control and Data Acquisition console/station • X-ray producing component with controls • Shielded X-ray enclosure. • waste container handling system with turntable dolly assembly • Conveyor cart, drum handling equipment (forklift with container grapple) X-ray imaging system • Video/Audio recording equipment 	N/A	N/A
11HERTR3	HERTR	High Energy Real Time Radiography [built by VJ Technologies] As identified in CCP-TP-053 and CCP-TP-198	<ul style="list-style-type: none"> • Control and Data Acquisition console/station • X-ray producing component with controls • Shielded X-ray enclosure. • Waste container handling system with turntable dolly assembly • Conveyor cart, drum handling equipment (forklift with container grapple) X-ray imaging system • Video/Audio recording equipment 	NA	NA
Visual Examination					
11VE1	N/A	CH Visual Examination As identified in CCP-TP-113	N/A	N/A	N/A
11VE2	N/A	CH Visual Examination (OSRP) Procedure CCP-TP-069 Procedure CCP-TP-101 Description: Characterization performed utilizing VE	N/A	N/A	N/A

List of Deactivated Processes/ Equipment			
WIPP #	Site Equipment #	Site Description	Date Deactivated
11PT1	PTGS/FRAM System 1 PTGS/FRAM System 3 LA05/LAG5	Portable Tomographic Gamma Scanner (PTGS) - The data from this system is used along with the relative isotopic data from the FRAM systems to generate quantitative isotopic information for each waste container.	2007
11HG1	Agilent GC/MS	N/A	2006
11RR1	RTR1	Real-Time Radiography Mobile Characterization System RTR-[built by VJ Technologies]	2008
N/A	HSG	SUMMA Sampling process on selected waste containers from waste stream lots.	7/13

CENTRAL CHARACTERIZATION PROJECT LIST OF CERTIFIED PROCEDURES At Los Alamos National Laboratory		
No.	Procedure Number	DOCUMENT TITLE
1.	CCP-PO-001	CCP Transuranic Waste 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-012	CCP/LANL Interface Document
6.	CCP-QP-001	CCP Graded Approach
7.	CCP-QP-002	CCP Training and Qualification Plan
8.	CCP-QP-005	CCP TRU Nonconforming Item Reporting and Control System
9.	CCP-QP-010	CCP Document Preparation, Approval and Control
10.	CCP-QP-014	CCP Quality Assurance Trend Analysis and Reporting
11.	CCP-QP-015	CCP Procurement
12.	CCP-QP-016	CCP Control of Measuring, Testing, and Data Collection Equipment
13.	CCP-QP-017	CCP Identification and Control of Items
14.	CCP-QP-018	CCP Management Assessment
15.	CCP-QP-019	CCP Quality Assurance Reporting to Management
16.	CCP-QP-021	CCP Surveillance Program
17.	CCP-QP-022	CCP TRU Software Quality Assurance Plan
18.	CCP-QP-023	CCP Handling, Storage, and Shipping
19.	CCP-QP-026	CCP Inspection Control
20.	CCP-QP-027	CCP Test Control
21.	CCP-QP-028	CCP Records Filing, Inventorying, Scheduling, and Dispositioning
22.	CCP-QP-030	CCP Written Practice for the Qualification of CCP Helium Leak Detection Personnel
23.	CCP-QP-032	CCP Written Practice for the Qualification of CCP Pressure Change Leak Testing Personnel
24.	CCP-TP-001	CCP Project Level Data Validation and Verification
25.	CCP-TP-002	CCP Reconciliation of DQOs and Reporting Characterization Data
26.	CCP-TP-005	CCP Acceptable Knowledge Documentation
27.	CCP-TP-028	CCP Radiographic Test Drum and Training Container Construction
28.	CCP-TP-030	CCP CH TRU Waste Certification and WWIS/WDS Data Entry
29.	CCP-TP-033	CCP Shipping of CH TRU Waste
30.	CCP-TP-053	CCP Standard Real-Time Radiography (RTR) Inspection Procedure
31.	CCP-TP-054	CCP Adjustable Center of Gravity Lift Fixture Preoperational Checks and Shutdown
32.	CCP-TP-055	CCP Varian Porta-Test Leak Detector Operations
33.	CCP-TP-058	CCP NDA Performance Demonstration Plan
34.	CCP-TP-059	CCP Operating the SuperHENC Using NDA 2000
35.	CCP-TP-063	CCP Operating the High Efficiency Neutron Counter Using NDA 2000
36.	CCP-TP-064	CCP Calibrating the High Efficiency Neutron Counter Using NDA 2000
37.	CCP-TP-069	CCP Sealed Source Visual Examination and Packaging

CENTRAL CHARACTERIZATION PROJECT LIST OF CERTIFIED PROCEDURES At Los Alamos National Laboratory		
No.	Procedure Number	DOCUMENT TITLE
38.	CCP-TP-076	CCP Operating the Mobile ISOCS Large Container Counter Using NDA 2000
39.	CCP-TP-077	CCP Calibrating the Mobile ISOCS Large Container Counter Using NDA 2000
40.	CCP-TP-082	CCP Waste Container Filter Vent Maintenance and Operation
41.	CCP-TP-083	CCP Gas Generation Testing
42.	CCP-TP-086	CCP CH Packaging Payload Assembly
43.	CCP-TP-101	CCP Off-Site Source Recovery Project Sealed Source Radiological Characterization
44.	CCP-TP-103	CCP Data Reviewing, Validating and Reporting Procedure for the NDA Counters at LANL Using NDA 2000
45.	CCP-TP-113	CCP Standard Waste Visual Examination
46.	CCP-TP-120	CCP Container Management
47.	CCP-TP-138	CCP Execution of Long-Term Objective for the Unified Flammable Gas Test Procedure
48.	CCP-TP-198	CCP HE-RTR Operating Procedure

CENTRAL CHARACTERIZATION PROJECT LIST OF DEACTIVATED PROCEDURES AT LANL			
#	Deactivated Procedure #	Deactivated Procedure Title	Date Deactivated
1.	CCP-QP-009	CCP Work Control Process	10/06
2.	CCP-QP-025	CCP Lessons Learned	6/10
3.	CCP-TP-089	MGSS Sampling Operations	10/09
4.	CCP-TP-092	CCP Mobile Gas Generation Testing Sampling System (MGSS) Data Calculation	10/09
5.	CCP-TP-094	GGTP Drum Screening and Batching	10/09
6.	CCP-TP-123	CCP Calibrating the Tomographic Gamma Scanning System	1/07
7.	CCP-TP-124	CCP Determining Isotopic Ratios in Waste Containers Using the RANT PC/FRAM Assay System	1/07
8.	CCP-TP-125	CCP Verification and Validation of NDA Data Using a Manual Review Method	1/07
9.	CCP-TP-128	CCP Waste Assay using the Portable Tomographic Gamma Scanner	1/07
10.	CCP-TP-127	CCP Canister Cleaning Using the ENTECH 3100 Canister Cleaning System	1/06
11.	CCP-TP-128	CCP TRU Waste Container HSG Analysis (Entech-Agilent)	1/06
12.	CCP-TP-129	CCP HSG Sampling and Analysis Batch Data Report Preparation (Entech-Agilent)	1/06
13.	CCP-TP-130	CCP Entech Canister Gauge Leak Test	1/06
14.	CCP-TP-131	CCP Manual Headspace Gas Sampling of TRU Waste Containers for the Entech/Agilent Analytical System	1/06
15.	CCP-TP-136	CCP Standardized Prohibited Item Remediation	9/06
16.	CCP-TP-043	CCP Chain of Custody for SUMMA® Canister Sampling Using the INL Lab	9/07
17.	CCP-QP-004	CCP Corrective Action Management	2/13
18.	CCP-QP-008	CCP Corrective Action Reporting and Control	2/13
19.	CCP-TP-098	CCP Installation of the NucFil HSG Sample Port	1/13
20.	CCP-TP-163	CCP Evaluation of Waste Packaging Records for Visual Examination of Records	Used only at Idaho
21.	CCP-TP-056	CCP HSG Performance Demonstration Plan	7/13
22.	CCP-TP-093	CCP Sampling of TRU Waste Containers	7/13
23.	CCP-TP-106	CCP Headspace Gas Sampling Batch Data Report Preparation	7/13
24.	CCP-TP-162	CCP Random Selection of Containers for Solids and Headspace Gas Sampling and Analysis	7/13
25.	CCP-QP-011	CCP Laboratory Logbooks	7/13
26.	CCP-TP-062	TRU Waste Visual Examination, Segregation, and Repacking	11/7
27.	CCP-PO-008	CCP Quality Assurance Interface with WTS QA Program	6/13
28.	CCP-QP-029	CCP Corrective Action Management	9/13
29.	CCP-TP-003	CCP Data Analysis for S3000, S4000, S5000 Characterization	6/13
30.	CCP-TP-008	CCP Solids Sampling Procedure	5/13
31.	CCP-TP-180	CCP Analytical Sample Management	5/13

Table 1. Tiering of Contact-Handled Transuranic Waste Characterization Processes Implemented by LANL-CCP (Based on May 23–25, 2006, Baseline Inspection and Subsequent Evaluations, Updated February 2014)

Process Elements	LANL-CCP Waste Characterization Process – T1 Changes	LANL-CCP Waste Characterization Process – T2 Changes*
Acceptable Knowledge, including Load Management	Any new waste category, as well as any new OSRP waste streams addressed in AKSRs separate from CCP-AK-LANL-008 or new OSRP waste streams beyond LA-OS-00-01.001, LA-OS-00-03, and LA-OS-00-04 added to CCP-AK-LANL-008 Load management for waste streams other than as documented in CCP-AK-LANL-009	Submission of a list of active LANL-CCP CH AKEs and SPMs Notification to EPA upon completion of or substantive modification** to: <ul style="list-style-type: none"> • AK-NDA memoranda • AK accuracy reports (annually, at a minimum) • AK reassessment memoranda and combination of waste streams that were distinct at the time of the baseline inspection • Any new or updated WSPFs, including all associated attachments (e.g., CIS and summation of aspects) and any change notices used to modify and update WSPFs, including additions to waste streams within an approved waste category • AKSRs (new and updated versions), including CCP-AK-008 • CCP-TP-005, Attachment 6, and associated memoranda • Site procedures requiring CBFO approval • Discrepancy Resolution Reports (new or updated)
Nondestructive Assay	New equipment or substantive physical modifications** to approved equipment Extension of or changes to approved calibration ranges for approved equipment	Submission of a list of LANL-CCP NDA operators, EAs and ITRs that performed work during the previous quarter Notification to EPA upon: <ul style="list-style-type: none"> • Substantive modification** to software for approved equipment • Substantive modification** to operating ranges upon CBFO approval • Substantive modification** to site procedures requiring CBFO approval • Any change to the MILCC that does not directly impact the EPA-approved calibration, including relocation of the system at LANL†
Real-Time Radiography	None	Submission of a list of LANL-CCP RTR operators and ITRs that performed work during the previous quarter Notification to EPA upon: <ul style="list-style-type: none"> • New equipment or substantive physical modifications** to approved equipment • Substantive modification** to site procedures requiring CBFO approval

Visual Examination and Visual Examination Technique	Implementation of any visual examination process for SCG S4000 waste.	Submission of a list of LANL-CCP VE operators, VE Experts and ITRs that performed work during the previous quarter Notification to EPA upon substantive modification** to site procedures requiring CBFO approval, including OSRP visual examination technique procedure
WIPP Waste Data System	None	Notification to EPA upon substantive modification** to: <ul style="list-style-type: none"> • Site procedures requiring CBFO approval • Excel spreadsheet, Waste Data System data entry summary, characterization and certification requiring CBFO approval

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.

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

** "Substantive modification" refers to a change with the potential to affect LANL-CCP'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.

† LANL-CCP will report relocation of any NDA system to EPA immediately.