

United States Government

Department of Energy

memorandumCarlsbad Field Office
Carlsbad, New Mexico 88221

DATE: SEP 25 2014

REPLY TO
ATTN OF: CBFO:TSTD:JRS:GL:14-1995:UFC 5900.00

SUBJECT: SRS-CCP CH and RH Recertification Audit A-14-04 and the Expansion to Include the Tier 1 Approval to Use the NABC Five-Foot Setback Configuration for CH waste in SLB2s and the Tier 1 Approval to include the RH Waste Stream SR-RH-SDD.01

TO: David Moody, Manager, U.S. Department of Energy, Savannah River Site
Robert L. McQuinn, President and Project Manager, Nuclear Waste Partnership LLC

The Carlsbad Field Office (CBFO) completed the annual Contact-Handled (CH) and Remote-Handled (RH) Recertification Audit A-14-04 of the Savannah River Site-Central Characterization Project (hereinafter referred to as SRS-CCP) TRU waste characterization activities on November 13-15, 2013. The characterization, certification, and transportation activities were determined to be adequate, satisfactorily implemented, and effective.

- On December 17, 2013, the U.S. Environmental Protection Agency (EPA) approved the Tier 1 change to use the Nondestructive Assay Box Counter (NABC) Five-Foot Setback Configuration for CH waste in SLB2s at SRS. The EPA provided approval on March 24, 2014, DOCKET NO: A-98-49; II-A4-182.
- On October 1, 2013, the U.S. Environmental Protection Agency (EPA) provided a limited approval of the Tier 1 change for the three sealed sources included in the RH Waste Stream SR-RH-SDD.01 at the SRS. The EPA provided approval on May 22, 2014, DOCKET NO: A-98-49; II-A4-184.
- On May 13-15, 2014, the CBFO Surveillance S-14-20 was conducted for the radiological characterization of the three sealed plutonium-beryllium neutron sources from the Physics Laboratory. The surveillance report was issued on July 23, 2014.

During the EPA Continued Compliance Inspection conducted August 19-21, 2014, the EPA was unable to observe SRS-CCP Real Time Radiography (RTR) operators due to the lack of a functioning RTR unit at the time of the inspection. The approval of all RTR characterization performed after August 19, 2014 is pending until the EPA is able to determine technical adequacy of RTR operations.

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The audit teams determined that the SRS-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 *CH and RH Transuranic Authorized Methods for Payload Control (TRAMPACs)*, *Safety Analysis Reports, Certifications of Compliance, and Remote-Handled TRU Waste Characterization Program Implementation Plan (WCPIP)*. The teams 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 SRS-CCP to include the Tier 1 EPA approval to use NABC Five-Foot Setback Configuration for CH waste in SLB2s and the Tier 1 EPA limited approval to add three sealed sources included in the RH Waste Stream SR-RH-SDD.01, the S-14-02 Surveillance for the radiological characterization of the Sealed Sources and grants continued authority at the SRS-CCP for TRU waste characterization, certification, and transportation activities.

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

- Attachment 1 describes the CCP certification program status;
- Attachment 2 contains the list of processes/equipment from Table 1 of this memorandum certified at this site;
- Attachment 3 contains the list of the 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 SRS-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, CBFO TRU Sites and Transportation Division, at (575) 234-7313.


Jose R. Franco, Manager
Carlsbad Field Office

Attachments (4)

David Moody/Robert L. McQuinn

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cc: w/attachments

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 WIPP Operating Record
 CBFO M&RC
 *ED denotes electronic distribution

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Table 1 – SRS-CCP CH and RH Certified Waste Characterization Processes

Characterization Process ¹	CH S3000 Solids		CH S4000 Soils/Gravel		CH S5000 Debris		RH S5000 Debris Waste Stream * 2, 3, 4, & 6	
	Newly generated	Retrievably-stored	Newly generated	Retrievably-stored	Newly generated	Retrievably-stored	Newly generated	Retrievably-stored
Acceptable Knowledge (AK)	N/A	Approved	Approved	Approved	Approved	Approved	N/A	Approved
Data Validation & Verification (V&V)	N/A	Approved	Approved	Approved	Approved	Approved	N/A	Approved
Load Management	N/A	Approved	Approved	Approved	Approved	Approved	N/A	N/A
Non-Destructive Assay (NDA) ⁵	Approved	Approved	Approved	Approved	Approved	Approved	N/A	N/A
Dose-to-Curie (DTC)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	Approved
Real-Time Radiography (RTR) ⁷	Not Approved	Not Approved	Not Approved	Not Approved	Not Approved	Not Approved	N/A	Not Approved
Visual Examination (VE)	Approved	Approved	Approved	Approved	Approved	Approved	N/A	Approved ⁶
WIPP Waste Information System (WWIS)	Approved	Approved	Approved	Approved	Approved	Approved	N/A	Approved

¹Characterization Processes in this table may not be completely listed in Attachment 2.

²EPA Baseline Approval of the waste characterization program implemented to characterize RH debris (S5000) waste from the Waste Stream SR-RH-FBL.01 dated April 2012, DOCKET NO: A-98-49; II-A4-161.

³EPA Approval of the Tier 1 change to include RH debris Waste Stream SR-RH-235F.01 dated February 11, 2013, DOCKET NO: A-98-49; II-A4-170.

⁴EPA Approval of the Tier 1 change to include RH debris Waste Stream SR-RH-221H.01 dated August 20, 2013, DOCKET NO: A-98-49; II-A4-177.

⁵EPA Approval of the Tier 1 change to use NABC Five-Foot Setback Configuration for CH waste in SLB2s dated March 24, 2014, DOCKET NO: A-98-49; II-A4-182.

⁶EPA Approval of the Tier 1 change to add the 3 sealed source containers of the RH Waste Stream SR-RH-SDD.01 at the SRS dated May 22, 2014, DOCKET NO: A-98-49; II-A4-184. For this waste stream, EPA is approving AK/VE for radiological characterization using simple mass-based isotopic relationships and then applying the OSRP database for non-plutonium radionuclides as an alternative characterization method from that used in CCP-TP-504. RH VE is only approved for this waste stream.

⁷All RTR characterization performed after August 19, 2014 is indeterminate until the EPA can observe and approve the RTR Operations.

*EPA approved the Baseline and Tier 1 change requests for Remote-Handled (RH) Battelle Columbus Laboratory (BCL) Waste Streams for SR-BCLDP.001.001, SR-BCLDP.002, SR-RL-BCLDP.001, SR-RL-BCLDP.002, SR-BCLDP.003, SR-BCLDP.001.002, SR-BCLDP.004.002, SR-BCLDP.004.003. The last BCL shipment from SRS was shipped on July 28, 2011 and arrived at the WIPP facility on July 29, 2011. An additional 20 BCL drums remain at the Hanford Site which will be processed as a Tier 1 to Waste Streams SR-RL-BCLDP.001, DOCKET NO: A-98-49; II-A4-149.

**CENTRAL CHARACTERIZATION PROJECT DEPLOYMENT AT
SAVANNAH RIVER SITE
CERTIFICATION PROGRAM STATUS**

The CBFO Director of the TRU Sites and Transportation Division and the CBFO Director of Quality Assurance Division have evaluated the documentation supporting the compliance of the Central Characterization Program (CCP) TRU waste program deployed at the Savannah River Site (SRS) (hereinafter referred as SRS-CCP).

STATUS

- All program elements remain complete.
- The following site program documents are current and comply with CBFO requirements*:
 - **CCP-PO-001, Revision 21**, *CCP Transuranic Waste Characterization Quality Assurance Project Plan*
CBFO:NTP:JRS:PG:13-0487:UFC 5900.00 dated April 17, 2013;
 - **CCP-PO-002, Revision 28**, *CCP Transuranic Waste Certification Plan*
Section 4.0 of CCP-PO-002
CBFO:NTP:JRS:GL:14-1865:UFC 5900.00 dated March 17, 2014;
 - **CCP-PO-003, Revision 13**, *CCP Transuranic Authorized Method for Payload Control*
CBFO:NTP:JRS:GL:13-0671:UFC 5900.00 dated July 29, 2013;
 - **CCP-PO-505, Revision 3**, *CCP Remote-Handled Transuranic Waste Authorized Methods for Payload Control*
CBFO:NTP:JRS:GL:14-1860:UFC 5900.00 dated March 5, 2014.

*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 is certified and used by the CCP at the SRS.
- Standard Operating Procedures - see Attachment 3 for the complete list of certified procedures/documents used by the CCP at the SRS.
- Tiering of the CH & RH TRU Waste Characterization Processes – see Attachment 4 for the implementation by CCP at SRS (based on EPA Baseline Inspections).

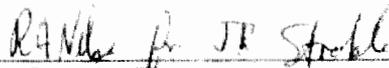
- CCP participated in the following performance demonstration programs (PDPs)*:
 - **NDA PDP – Cycle B13A approval** for radioassay of WIPP wastes contained in an SWB using the NABC (SR05/SRN2).
Memo CBFO:NTP:MB:CC:13-0765:UFC 5900.00 dated October 21, 2013.
 - **NDA PDP – Cycle 21A approval** for radioassay of WIPP wastes contained in 55-gallon waste drums using the NABC (SR05/SRN2).
Memo CBFO:NTP:NC:LEC:14-1939:UFC 5900.00 dated June 24, 2014.
- *Note that the PDP cycles listed above are the current revision and may not be the revision that was audited.
- CBFO conducted the CH and RH Recertification Audit A-14-04 of the SRS-CCP on November 13-15, 2013.
 - CAR 14-006 was issued on November 26, 2013.
 - CAR 14-006 was closed on January 6, 2014.
 - Interim Audit Report was issued on December 13, 2013.
 - The Final Audit Report was issued to NMED on March 3, 2014.
 - NMED approval was issued on April 18, 2014.
- The CBFO conducted Audit A-13-11 of the CCP Quality Assurance Program on April 16-18, 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.
- The CBFO conducted Audit A-14-05 of the CCP CH and RH transportation activities for all sites on December 3-5, 2013.
 - The Audit Report was issued on January 15, 2014.
- The CBFO requested a Tier 1 change on December 17, 2013 for the five-foot setback configuration for CH waste in SLB2s at the SRS.
 - The EPA issued approval on March 24, 2014 (Docket No: A-98-49; II-A4-182).
 - EPA provided concurrence on April 16, 2014.
- The CBFO requested a Tier 1 change on October 1, 2013 to add the RH Waste Stream SR-RH-SDD.01 at the SRS.
 - The EPA issued approval on May 22, 2014 (Docket No: A-98-49; II-A4-184).

- The CBFO conducted the Surveillance S-14-20 for the radiological characterization of the three sealed plutonium-beryllium neutron sources from the Physics Laboratory.
 - The surveillance report was issued on July 23, 2014.
- During the EPA Continued Compliance Inspection conducted August 19-21, 2014, the EPA were unable to observe SRS-CCP Real Time Radiography (RTR) operators due to the lack of a functioning RTR unit at the time of the EPA inspection. The approval of all RTR characterization performed after August 19, 2014 is pending until the EPA is able to determine technical adequacy of RTR operations.
- The EPA issued concurrence on the draft recertification A-14-04 and the addition of the Surveillance S-14-20 and Tier 1 of the RH Waste Stream SR-RH-SDD.01 at the SRS on September 23, 2014.

RECOMMENDATION

The recommendation to the CBFO Manager is to authorize CCP at SRS to include the Tier 1 approval to use of the NABC Five-Foot Setback Configuration for CH waste in SLB2s, the Surveillance S-14-20, Tier 1 for the three sealed sources included in the RH Waste Stream SR-RH-SDD.01 and to continue the authority for TRU waste characterization, certification, and transportation activities of CH solids (S3000), CH soils/gravel (S4000), CH debris (S5000), and RH debris (S5000). Attachments 2 and 3 list the systems and procedures that constitute the bounds of this authority. Attachment 4 is the CH and RH Tiering of TRU Waste Characterization Processes implemented by the CCP at SRS.

CONCURRENCE



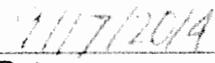
J.R. Stroble, Director
CBFO TRU Sites and Transportation Division



Date



Michael R. Brown, Director
CBFO Quality Assurance Division



Date

CENTRAL CHARACTERIZATION PROJECT
List of Processes/Equipment Certified from Table 1 of Memo at Savannah River Site

WIPP WWIS #	Site Equipment #	Description	Components	Software	NDA Calibrated Range, Operating Range and TMU
Non-destructive Assay					
1NABC1	NABC – (SR05/SRN5)	Nondestructive Assay Box Counter – 55-gallon drums, standard waste boxes (SWBs), and standard large box 2s (SLB2s) Method identified in CCP-TP-189 and CCP-TP-191	Gamma <ul style="list-style-type: none"> • Two Co-60 Transmission Sources • Two NaI Gamma Detectors for transmission measurements • Four Broad Energy Germanium (BEGe) Detectors for gamma emission measurements • Six Digital Signal Processors Neutron <ul style="list-style-type: none"> • 320 He-3 Tubes in High Density Polyethylene Liner • Cf-252 Add-A-Source Correction 	<ul style="list-style-type: none"> • NDA-2000 • Genie-2000 	The NABC has two modalities of operation: gamma and neutron. Therefore, two sets of calibration documents exist. For the gamma modality three calibrations are approved: (1) Gamma near-field calibration utilizing multi-curve efficiency-based calibration, in accordance with ASTM Standard C1133/C1133-10 for the Box Segmented Gamma System at the Savannah River Site, CCP-SRS-NABC-2011-01, May 2, 2011. Both 1-hour extended count time and 20-minute reduced count time calibration arrangements are approved for NABC gamma near-field efficiency-based calibration. (2) Gamma near-field calibration utilizing matrix transmission correction-based calibration, in accordance with ASTM Standard C1133/C1133-10 for the Box Segmented Gamma System at the Savannah River Site, CCP-SRS-NABC-2011-01, May 2, 2011. Both 1-hour extended count time and 20-minute reduced count time calibration arrangements are approved for NABC gamma near-field matrix transmission correction-based calibration (3) Gamma [5-foot set-back] far-field calibration utilizing multi-curve efficiency-based calibration, in accordance with ASTM Standard C1133/C1133-10 for the Box Segmented Gamma System at the Savannah River Site, CCP-SRS-NABC-2011-01, May 2, 2011. Both 1-hour extended count time and 20-minute reduced count time calibrations approved for NABC gamma efficiency-based calibration for 55 gallon drums and SWB's. SLB2's[5 foot setback] are approved for one

CENTRAL CHARACTERIZATION PROJECT					
List of Processes/Equipment Certified from Table 1 of Memo at Savannah River Site					
WIPP WWIS #	Site Equipment #	Description	Components	Software	NDA Calibrated Range, Operating Range and TMU
					<p>hour counts only and are limited to a two container population. In addition the SLB2 far field configuration may not be used for sorting TRU waste. CCP-SRS-SRBC001 R7</p> <p>For the passive neutron modality, two calibrations are approved:</p> <p>(1) Passive neutron calibration utilizing high-efficiency coincidence and multiplicity counting technique together with Cf-252 Add-A-Source based-calibration for 1-hour extended count time, in accordance with ASTM Standard C-1207 (Neutron Coincidence Counting) and ASTM Standard C-1500 (Neutron Multiplicity Counting) for the Box Neutron Assay System at the Savannah River Site. CCP-SRS-NABC-2011-01, May 2, 2011. The 1-Hour extended count time calibration arrangement is approved for the NABC Box Neutron Assay System neutron coincidence and multiplicity counting Cf-252 Add-A-Source-based calibrations.</p> <p>(2) Passive neutron calibration utilizing high-efficiency coincidence and multiplicity counting technique together with Cf-252 Add-A-Source based-calibration for 20-minute reduced count time, in accordance with ASTM Standard C-1207 (Neutron Coincidence Counting) and ASTM Standard C-1500 (Neutron Multiplicity Counting) for the Box Neutron Assay System at the Savannah River Site. CCP-SRS-NABC-2011-01, May 2, 2011. The 20-minute reduced count time calibration arrangement is approved for the NABC Box Neutron Assay System neutron coincidence and multiplicity counting Cf-252 Add-A-Source-based</p>

CENTRAL CHARACTERIZATION PROJECT					
List of Processes/Equipment Certified from Table 1 of Memo at Savannah River Site					
WIPP WWIS #	Site Equipment #	Description	Components	Software	NDA Calibrated Range, Operating Range and TMU
					calibrations. The determination of the TMU for the NABC is similarly documented for the gamma modality in A40972, "Savannah River Box Gamma Box Counter Total Measurement Uncertainty Report for Alternatives for Non-Destructive Assay (NDA) of Large Containers to Allow Shipping in TRUPACT-III without Resizing and/or Repackaging," dated October 15, 2007, and for the neutron modality in A41309, "Savannah River Neutron Box Counter Total Measurement Uncertainty Report for Alternatives for Non-Destructive Assay (NDA) of Large Containers to Allow Shipping in TRUPACT-III without Resizing and/or Repackaging," dated October 15, 2007.

CENTRAL CHARACTERIZATION PROJECT					
List of Processes/Equipment Certified from Table 1 of Memo at Savannah River Site					
WIPP WWIS #	Site Equipment #	Description	Components	Software	NDA Calibrated Range, Operating Range and TMU
Non-destructive Examination					
1RR4	RTR-4	Real-time Radiography Method identified in CCP-TP-053 CCP-TP-145	<ul style="list-style-type: none"> • Shielded x-ray enclosure with a rear container loading door and manually opened personnel door • Conveyer cart • Drum manipulation equipment • X-ray imaging system including x-ray tube, image intensifier, and video camera • Video/audio recording equipment • Mobile platform 	N/A	N/A
1LCNDE	LCNDE	Real-time Radiography Method identified in CCP-TP-053 CCP-TP-074	<ul style="list-style-type: none"> • X-ray source - Linatron 3 MeV linear accelerator • Linear Diode Array (LDA) - X-ray imaging system which is used to produce a single still image of the container. • Area Detector Array (ADA) - X-ray imaging system which provides real time radioscopic images of the container. • Imaging and control software. • Container manipulation equipment • Video/audio recording equipment 	N/A	N/A

¹ During the EPA Continued Compliance Inspection conducted August 19-21, 2014, the EPA was unable to observe SRS-CCP Real Time Radiography (RTR) operators due to the lack of a functioning RTR unit at the time of the EPA inspection. The approval of all RTR characterization performed after August 19, 2014 is pending until the EPA is able to determine technical adequacy of RTR operations.

CENTRAL CHARACTERIZATION PROJECT					
List of Processes/Equipment Certified from Table 1 of Memo at Savannah River Site					
WIPP WWIS #	Site Equipment #	Description	Components	Software	NDA Calibrated Range, Operating Range and TMU
Visual Examination					
VISUAL	Visual Examination	Visual Examination Method identified in CCP-TP-113, CCP-TP-163	N/A	N/A	N/A
1RHVE1	Visual Examination Activities for Waste Stream SR-RH-SDD.01 only	CCP-TP-500 CCP-TP-163	N/A	N/A	N/A
Dose-to-Curie					
1DTC1	Dose-to-Curie	Radiological characterization Method identified in CCP-TP-504	As identified in CCP-TP-504	As identified in CCP-TP-504	N/A

List of Deactivated Equipment			
WIPP #	Site Equipment #	Site Description	Date Deactivated
1IP1	MCS IPAN/GEA – MC-01, Group MC-N1	Mobile Characterization Systems (MCS) Imaging Passive-Active Neutron/Gamma Energy Analysis (IPAN/GEA) [Built by BNFL] – 55 gallon drums	May 2006
1HG1	NUCFIL HSG DVS2	NucFil headspace gas system DVS2 – VOCs and hydrogen and methane analysis	March 2008
1IQ1	IQ3 - SR03/SR-G2	Canberra Mobile Qualitative and Quantitative Drum Counter with Isotopics (IQ3) Method identified in CCP-TP-047	July 2009
1SG1	MCS SGS – (SR04/SRG3)	Mobile Characterization Systems (MCS) Segmented Gamma Scanner (SGS) – 55 gallon drums	July 2010
1RR3	RTR-15 (owned by SRS)	Real-time Radiography Built by Marietta X-Ray	August 2014

CENTRAL CHARACTERIZATION PROJECT LIST OF CERTIFIED PROCEDURES AT Savannah River Site		
#	Procedure #	Procedure Title
1.	CCP-PO-001	CCP Transuranic Waste Characterization Quality Assurance Project Plan
2.	CCP-PO-002	CCP Transuranic Waste Certification Plan
3.	CCP-PO-003	CCP Transuranic Authorized Methods for Payload Control (CCP CH-TRAMPAC)
4.	CCP-PO-004	CCP/SRS Interface Document
5.	CCP-PO-005	CCP Conduct of Operations
6.	CCP-PO-006	CCP Conduct of Operations Matrix
7.	CCP-PO-008	CCP Quality Assurance Interface with the WTS Quality Assurance Program
8.	CCP-PO-050	<i>CCP TRUPACT-III TRU Waste Authorized Methods for Payload Control (CCP TRUPACT-III TRAMPAC</i>
9.	CCP-PO-505	CCP Remote-Handled Transuranic Waste Authorized Methods for Payload Control (CCP RH-TRAMPAC)
10.	CCP-QP-001	CCP Graded Approach
11.	CCP-QP-002	CCP Training and Qualification Plan
12.	CCP-QP-005	CCP TRU Nonconforming Item Reporting and Control
13.	CCP-QP-008	CCP Records Management
14.	CCP-QP-010	CCP Document Preparation, Approval, and Control
15.	CCP-QP-014	CCP Quality Assurance Trend Analysis and Reporting
16.	CCP-QP-015	CCP Procurement
17.	CCP-QP-016	CCP Control of Measuring and Testing Equipment
18.	CCP-QP-017	CCP Identification and Control of Items
19.	CCP-QP-018	CCP Management Assessment
20.	CCP-QP-019	CCP Quality Assurance Reporting to Management
21.	CCP-QP-021	CCP Surveillance Program
22.	CCP-QP-022	CCP Software Quality Assurance Plan
23.	CCP-QP-023	CCP Handling, Storage and Shipping
24.	CCP-QP-026	CCP Inspection Control
25.	CCP-QP-027	CCP Test Control
26.	CCP-QP-028	CCP Records Filing, Inventorying, Scheduling, and Dispositioning
27.	CCP-QP-030	CCP Written Practice for the Qualification of CCP Helium Leak Detection Personnel
28.	CCP-QP-032	CCP Written Practice for the Qualification of CCP Pressure Change Leak Testing Personnel
29.	CCP-TP-001	CCP Project Level Data Validation and Verification
30.	CCP-TP-002	CCP Reconciliation of DQOs and Reporting Characterization Data
31.	CCP-TP-003	CCP Data Analysis for S3000, S4000, and S5000 Characterization
32.	CCP-TP-005	CCP Acceptable Knowledge Documentation
33.	CCP-TP-028	CCP Radiographic Test and Training Drum Construction
34.	CCP-TP-030	CCP CH TRU Waste Certification and WWIS/WDS Data Entry
35.	CCP-TP-033	CCP Shipping of CH TRU Waste
36.	CCP-TP-035	CCP Container Management

CENTRAL CHARACTERIZATION PROJECT LIST OF CERTIFIED PROCEDURES AT Savannah River Site		
#	Procedure #	Procedure Title
37.	CCP-TP-053	CCP Standard Real-Time Radiography (RTR) Inspection Procedure
38.	CCP-TP-054	CCP Adjustable Center of Gravity Lift Fixture Preoperational Checks and Shutdown
39.	CCP-TP-055	CCP Varian Porta-Test Leak Detector Operations
40.	CCP-TP-058	CCP NDA Performance Demonstration Plan
41.	CCP-TP-066	CCP Radiography Screening Procedure for Prohibited Items
42.	CCP-TP-074	CCP Large Container Non-Destructive Examination (LCNDE) Operating Procedure
43.	CCP-TP-075	CCP RTR #15 Operating Procedure
44.	CCP-TP-082	CCP Preparing and Handling Waste Containers for Headspace Gas Sampling
45.	CCP-TP-086	CCP TRUPACT-II Shipping Payload Assembly
46.	CCP-TP-087	CCP Scale Operations
47.	CCP-TP-098	CCP Installation of the NucFil HSG Sample Port
48.	CCP-TP-113	CCP Standard Contact-Handled Waste Visual Examination
49.	CCP-TP-120	CCP Container Management
50.	CCP-TP-136	CCP Standardized Prohibited Item Remediation
51.	CCP-TP-139	CCP In Situ Object Counting System Nondestructive Assay Operating Procedure
52.	CCP-TP-145	CCP RTR #4 Operating Procedure
53.	CCP-TP-163	CCP Evaluation of Waste Packaging Records for Visual Examination of Records
54.	CCP-TP-189	CCP Box Segmented Gamma System (BSGS) Operating Procedure
55.	CCP-TP-190	CCP Box Segmented Gamma System (BSGS) Calibration Procedure
56.	CCP-TP-191	CCP Box Neutron Assay System (BNAS) Operating Procedure
57.	CCP-TP-192	CCP Box Neutron Assay System (BNAS) Calibration Procedure
58.	CCP-TP-193	CCP Data Reviewing, Validating, and Reporting Procedure for the Nondestructive Assay Box Counters
59.	CCP-TP-500	CCP Remote-Handled Waste Visual Examination
60.	CCP-TP-504	Dose-to-Curie Survey Procedure for Remote-Handled Transuranic Waste
61.	CCP-TP-505	CCP Removable Lid Canister/Neutron Shielded Canister Loading
62.	CCP-TP-506	CCP Preparation of the RH TRU Waste AK Characterization Reconciliation Report
63.	CCP-TP-507	CCP Shipping of Remote-Handled Transuranic Waste
64.	CCP-TP-509	CCP Remote-Handled Transuranic Container Tracking
65.	CCP-TP-530	CCP RH TRU Waste Certification and WWIS/WDS Data Entry

CCP SRS Deactivated Procedures			
#	Procedure #	Procedure Title	Deactivation Date
1.	CCP-QP-007	CCP Document Control	December 2001
2.	CCP-QP-009	CCP Work Control Process	October 2006
3.	CCP-QP-012	CCP Indoctrination Plan	March 2002
4.	CCP-QP-013	CCP QAPD Matrix	May 2003
5.	CCP-QP-020	CCP Independent Assessments	September 2003
6.	CCP-QP-024	CCP Certification of CCP Audit Personnel	September 2003
7.	CCP-TP-007	CCP Single Sample Manifold Headspace Gas Sampling and Analysis Procedure	January 2008
8.	CCP-TP-009	CCP Single Sample Manifold Data Handling Procedure	January 2008
9.	CCP-TP-011	CCP Radiography Inspection Operating Procedure	May 2007
10.	CCP-TP-022	CCP Mobile IPAN/GEA Maintenance Procedure	November 2007
11.	CCP-TP-023	CCP Mobile IPAN/GEA System Mobilization, Power Up, and Demobilization Procedure	November 2007
12.	CCP-TP-024	CCP Mobile IPAN/GEA Operating and Data Generation Level Validation Procedure	November 2007
13.	CCP-TP-025	CCP Mobile IPAN/GEA Expert Analysis Procedure	November 2007
14.	CCP-TP-026	CCP Mobile IPAN/GEA Calibration Procedure	May 2007
15.	CCP-TP-029	CCP Single Sample Manifold Headspace Gas Sampling and Analysis Methods and Equipment Calibration	January 2008
16.	CCP-TP-032	CCP Single Sample Manifold Data Validation Procedure	January 2008
17.	CCP-TP-046	CCP Mobile IQ3 System Calibration Procedure	July 2009
18.	CCP-TP-047	CCP Mobile IQ3 Gamma Scanner Operation	July 2009
19.	CCP-TP-048	CCP-TP-048, CCP Mobile IQ3 System Data Reviewing, Validating, and Reporting Procedure	July 2009
20.	CCP-TP-050	CCP Mobile Segmented Gamma Scanner Calibration Procedure	December 2010
21.	CCP-TP-051	CCP Mobile Segmented Gamma Scanner Operation	December 2010
22.	CCP-TP-052	CCP Mobile Segmented Gamma Scanner Data Reviewing, Validating and Reporting	December 2010
23.	CCP-TP-057	CCP Project Level Data Validation and Verification for Headspace Gas Sampling and Analysis	September 2002
24.	CCP-TP-084	CCP Removal of Prohibited Items Within Transuranic Visual Examination Facility	May 2004
25.	CCP-TP-085	CCP TRU Visual Examination Facility Operations	November 2005
26.	CCP-TP-088	CCP Disposal Program Data Generation Level Review for Visual Examination	November 2005
27.	CCP-TP-089	CCP Mobile Gas Generation Testing Sampling System (MGSS) Sampling Operation	October 2009
28.	CCP-TP-092	CCP Mobile Gas Generation Testing Sampling System (MGSS) Data Calculation	October 2009
29.	CCP-TP-094	GGTP Drum Screening and Batching	October 2009
30.	CCP-TP-160	CCP Random Selection of Containers for Headspace Gas Sampling and Analysis	June 2009
31.	CCP-TP-161	CCP Random Selection of Containers for Solids Sampling and Analysis	June 2009
32.	CCP-QP-004	CCP Corrective Action Management	February 6, 2013
33.	CCP-QP-006	CCP Corrective Action Reporting and Control	February 6, 2013
34.	CCP-QP-011	CCP Laboratory Logbooks	May 14, 2013

CCP SRS Deactivated Procedures			
#	Procedure #	Procedure Title	Deactivation Date
35.	CCP-TP-162	CCP Random Selection of Containers for Solids and Headspace Gas Sampling and Analysis	May 14, 2013
36.	CCP-TP-180	CCP Analytical Sample Management	May 14, 2013
37.	CCP-TP-106	CCP Headspace Gas Sampling Batch Data Report Preparation	May 14, 2013
38.	CCP-TP-056	CCP HSG Performance Demonstration Plan	May 14, 2013
39.	CCP-TP-093	CCP Sampling of TRU Waste Containers	May 14, 2013
40.	CCP-TP-050	CCP Mobile Segmented Gamma Scanner Calibration Procedure	July, 2010
41.	CCP-TP-051	CCP Mobile Segmented Gamma Scanner Operation	July, 2010
42.	CCP-TP-052	CCP Mobile Segmented Gamma Scanner Data Reviewing, Validating, and Reporting	July, 2010
43.	CCP-TP-510	CCP Remote-Handled Radiography Test and Training Drum Requirements	April 2012
44.	CCP-QP-029	CCP Corrective Action Management	September 2013

**Tiering of CH TRU Waste Characterization Processes Implemented by SRS-CCP
 (Based on October 31 – November 3, 2011, Baseline Inspection and Subsequent Tier 1 Evaluations, Updated February 2013)**

Process Elements	SRS-CCP Waste Characterization Processes – T1 Changes	SRS-CCP Waste Characterization Processes – T2 Changes*
Acceptable Knowledge, including Load Management	Load management for the S3000 summary category group	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-AK and AK-NDANDE Discrepancy Resolution Reports • WSPFs and AKSRs and related attachments (e.g., CIS) for all new or modified waste streams, including change notices • CCP-TP-005, Attachments 4 and 6 and associated memoranda • Add Container 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 • Creation of newly generated soil or debris waste streams through remediation or decontamination and decommissioning activities
Nondestructive Assay	New equipment or substantive physical modifications** to approved equipment Extension of or changes to the approved calibration range for approved equipment	Notification to EPA upon substantive modification** to: <ul style="list-style-type: none"> • Site procedures requiring CBFO approval • Software for approved equipment • Operating ranges upon CBFO approval
Real-Time Radiography	None	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	Changes in the vendor performing visual examination or visual examination technique	Notification to EPA upon substantive modification** to site procedures requiring CBFO approval
WIPP Waste Data System	Changes to Waste Data System algorithms specific to load management.	Notification to EPA upon substantive modification** to: <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.

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

** “Substantive modification” refers to a change with the potential to affect SRS-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.

**Tiering of RH Transuranic Waste Characterization Processes Implemented by SRS-CCP
(Based on August 20 – September 1, 2011, and December 6-7, 2011, Baseline Inspection, Updated March 2014)**

Process Elements	SRS-CCP RH Waste Characterization Process – T1 Changes	SRS-CCP RH Waste Characterization Process – T2 Changes*
Acceptable Knowledge	<p>Any new SCG S3000 or S4000 RH waste stream</p> <p>Any new SCG S5000 RH waste stream that <u>does not</u> have a companion CH waste stream</p> <p>Substantive modification** to EPA-approved AKSRs and certification confirmation test plans (e.g., CCP-AK-SRS-580, CCP-AK-SRS-582, CCP-CP-SRS-562)</p>	<p>Notification to EPA upon characterization of any new SCG S5000 RH waste stream that <u>does</u> have a companion CH waste stream</p> <p>Notification to EPA upon availability or nonsubstantive modification** of AKSRs and certification confirmation test plans (e.g., CCP-AK-SRS-580, CCP-AK-SRS-582, CCP-CP-SRS-562)</p> <p>Notification to EPA upon availability or modification of:</p> <ul style="list-style-type: none"> • CCP-TP-005 or nonconformance and corrective action procedures requiring CBFO approval • CCP-TP-005 attachments, including when Attachment 4 is generated to reflect the updated AKSR Source Document Reference List • WSPF, CIS, CRR and related attachments, and any subsequent revisions to these documents • AK accuracy reports (annually, at a minimum) • Add Container Memoranda • Additional discrepancy resolution reports and nonconformance reports
Radiological Characterization, including Dose-to-Curie	<p>Use of the MCS/ISOCS to provide any information other than the relative determinations of gamma-emitting radionuclides for use as scaling factors</p> <p>Future use of the ORTEC/ISOCS for any RH TRU waste</p> <p>Application of new (i.e., not EPA-approved) scaling factor processes for isotopic determination (applies to new RH waste streams and to the addition of containers to an approved waste stream)</p> <p>Substantive modification** to EPA-approved procedures or radiological characterization technical reports (e.g., CCP-TP-504, CCP-AK-SRS-581, CCP-RC-SRS-561)</p>	<p>Notification to EPA upon:</p> <ul style="list-style-type: none"> • Characterization of any new RH waste stream using an approved scaling factor process for isotopic determination • Modification of the procedures or radiological characterization technical reports (e.g., CCP-TP-504, CCP-AK-SRS-581, CCP-RC-SRS-561) requiring CBFO approval • Availability of calculation package CCP-SRS-44 or equivalent records
Visual Examination	Any use of visual examination	N/A
Real-Time Radiography	Real-time radiography by any new process	<p>Notification to EPA upon:</p> <ul style="list-style-type: none"> • Substantive modification** to site procedures requiring CBFO approval • Characterization of SCG S3000 or S4000 RH waste by an approved process

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.

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

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