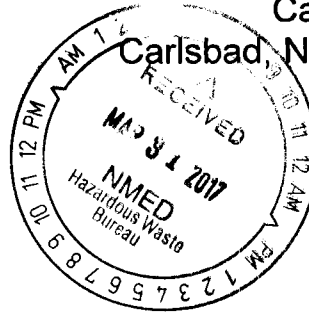


United States Government



# memorandum

 Carlsbad Field Office  
 New Mexico 88221


DATE: MAR 31 2017  
 REPLY TO  
 ATTN OF: CBFO:NCD:JRS:PG:17-0755:UFC 5900.00  
 SUBJECT: Recertification for INL-CCP

TO: James Van Vliet, DOE-ID  
 Mr. Philip Breidenbach, President and Project Manager, Nuclear Waste Partnership LLC

The Carlsbad Field Office (CBFO) has completed annual Recertification Audits A-14-18 of the Idaho National Laboratory (INL) Central Characterization Program (CCP) transuranic (TRU) waste certification activities conducted June 3-5, 2014, A-15-18 of the INL/CCP conducted on June 16-18, 2015, and A-16-18 of the INL-CCP conducted on June 14-16, 2016. In addition, CBFO completed surveillance S-17-30, INL-CCP Waste Stream ID-RF-S3114 Readiness to Ship Surveillance.

The assessment teams determined that the INL-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)*, including the *Enhanced AK Process*, the *WIPP Documented Safety Analysis (DSA)*, the *CH and RH Transuranic Authorized Methods for Payload Control (TRAMPAC)*, and *Certification of Compliance*. The surveillance team determined that the INL-CCP has successfully and effectively implemented the applicable sections of WIPP WAC, Revision 8, Appendices H and I.

Based on the results of the CBFO Audits/Surveillances (See Attachment I), and conditions and limitations provided by the New Mexico Environment Department (NMED) and the US Environmental Protection Agency (USEPA), the CBFO grants continued authority at the INL-CCP for TRU Waste characterization, certification, and transportation activities as identified in Table 1 of this memorandum, and Audits A-14-18, A-15-18, and A-16-18, subject to the following limitations and conditions:

- This letter applies only to the shipment of *ID-RF-S3114 waste stream*

TRU waste characterization, certification, or transportation 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 INL-CCP certification program status;
- Attachment 2 contains the list of processes/equipment from Table 1 and 2 of this memorandum certified at this site;
- Attachment 3 contains the list of the INL-CCP certified procedures/documents; and

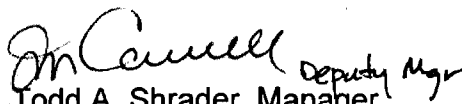
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MAR 31 2017

- Attachment 4 describes specific INL-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 INL-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 INL-CCP shall report Tier 2 changes to the CBFO on a quarterly basis.
- Attachment 5 further describes the Waste Acceptance Criteria, Revision 8, gap analysis performed for and is approved for the initial waste shipment.

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

*for*  Deputy Mgr  
Todd A. Shrader, Manager  
Carlsbad Field Office

Attachments (5)

MAR 31 2017

cc: w/attachments

G. Basabilvazo, CBFO	* ED	B. Pace, NWP	ED
G. Birge, CBFO	ED	M. Ramirez, NWP	ED
M. Brown, CBFO	ED	A. Ray, NWP	ED
T. Carver, CBFO	ED	R. Reeves, NWP	ED
N. Castaneda, CBFO	ED	F. Romo, NWP	ED
H. Cruickshank, CBFO	ED	R. Romo, NWP	ED
C. Fesmire, CBFO	ED	C. Simmons, NWP	ED
D. Miehl, CBFO	ED	F. Sharif, NWP	ED
M. Navarrete, CBFO	ED	D. Stegman, NWP	ED
J.R. Stroble, CBFO	ED	K. Urquidez, NWP	ED
J. Malmo, DOE-ID	ED	M. Valentine, NWP	ED
G. Byram, ITG	ED	R. Allen, CTAC	ED
J. McCoy, ITG	ED	P. Hinojos, CTAC	ED
G. Tedford, ITG	ED	P. Martinez, CTAC	ED
J. Ellis, EPA	ED	G. White, CTAC	ED
E. Feltcorn, EPA	ED	M. Carter, LANL	ED
R. Joglekar, EPA	ED	P. Gilbert, LANL	ED
T. Peake, EPA	ED	G. Lyshik, LANL	ED
J. Kieling, NMED	ED	W. Weyerman, LANL	ED
R. Maestas, NMED	ED	S. Percy, TFE, Inc.	ED
J. Blankenhorn, NWP	ED	WIPP Operating Record	ED
J. Britain, NWP	ED	CBFO M&RC	
B. Broomfield, NWP	ED	*ED denotes electronic distribution	
B. Carlsen, NWP	ED		
J. Carter, NWP	ED		
R. Chavez, NWP	ED		
D. Cook, NWP	ED		
A.J. Fisher, NWP	ED		
R. Galbraith, NWP	ED		
E. Gulbransen, NWP	ED		
J. Harvill, NWP	ED		
J. Haschets, NWP	ED		
R. Kantrowitz, NWP	ED		
C. Kirkes, NWP	ED		
R. Kuhn, NWP	ED		
R. Lee, NWP	ED		
C. Luoma, NWP	ED		
S. Martinez, NWP	ED		
R. McGinnis, NWP	ED		
J. Morrison, NWP	ED		
W. Most, NWP	ED		
L. Oberbeck, NWP	ED		
S. Offner, NWP	ED		

**Table 1**  
**INL-CCP CH Certified Waste Characterization Processes**

Characterization Process <sup>3</sup>	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)	APPROVED	APPROVED	APPROVED	N/A	APPROVED	APPROVED
Chemical Compatibility Evaluation	N/A	ID-RF-S3114	N/A	N/A	N/A	N/A
Basis of Knowledge Evaluation	N/A	ID-RF-S3114 <sup>4</sup>	N/A	N/A	N/A	N/A
Load Management	APPROVED <sup>1</sup>	APPROVED <sup>1</sup>	APPROVED	N/A	APPROVED <sup>1</sup>	APPROVED <sup>1</sup>
Data Validation & Verification (V&V)	APPROVED	APPROVED	APPROVED	N/A	APPROVED	APPROVED
Nondestructive Assay (NDA)	APPROVED	APPROVED	APPROVED	N/A	APPROVED	APPROVED
Real-time Radiography (RTR)	N/A	APPROVED	N/A	N/A	N/A	APPROVED
Visual Examination (VE) <sup>2</sup>	APPROVED	APPROVED	APPROVED	N/A	APPROVED	N/A
Dose-to-Curie	N/A	N/A	N/A	N/A	N/A	N/A
WIPP Waste Information System/Waste Data System (WWIS/WDS)	APPROVED	APPROVED	APPROVED	N/A	APPROVED	APPROVED

<sup>1</sup> Debris and solid waste from AMWTP characterized by INL-CCP may not be load managed with waste characterized by the AMWTP contractor. (Exception – new waste stream "S3000" will be made up of a mix of "ID-RF-S3114" and "BNINW216", which are approved for load management. "S3000" is approved for load management.)

<sup>2</sup> VE of Record is not approved by NMED based on August 4, 2009 letter based on A-09-08.

<sup>3</sup> Characterization Processes in this Table may not be completely listed in Attachment 2.

EPA CH Baseline approval on November 1, 2005. DOCKET NO: A-98-49; II-A4-59.

Tier 1 approval of the HENC on November 16, 2005, DOCKET NO: A-98-49; II-A4-60.

Tier 1 approval of VE as a QC Check for RTR on November 16, 2005, DOCKET NO: A-98-49; II-A4-61.

Tier 1 approval of Pit 4 and Pit 6 (ARP-I and ARP-II) waste on August 3, 2006 & December 5, 2006, DOCKET NO: A-98-49; II-A4-67 and DOCKET NO: A-98-49; II-A4-71.

Tier 1 approval of SuperHENC on February 28, 2007, DOCKET NO: A-98-49; II-A4-86.

Tier 1 approval of Multi-Curve Efficiency Calibration for the WAGS on October 7, 2008; DOCKET NO: A-98-49; II-A4-107.

Tier 1 approval of VE by Review of Waste Packaging Audio/Visual Recordings on March 4, 2009, DOCKET NO: A-98-49; II-A4-110.

Tier 1 approval of recalibration of the HENC on September 22, 2009, DOCKET NO: A-98-49; II-A4-119.

Tier 1 approval of supplemental calibration for the WAGS to allow filters on June 23, 2011, DOCKET NO: A-98-49; II-A4-150.

Tier 1 approval of recalibration of the SGRS on February 26, 2013, DOCKET NO: A-98-49; II-A4-172.

<sup>4</sup> The ID-RF-S3114 was determined to have no oxidizing chemicals.

**CENTRAL CHARACTERIZATION PROGRAM DEPLOYED AT  
IDAHO NATIONAL LABORATORY  
CERTIFICATION PROGRAM STATUS**

The CBFO Directors of the National TRU Program Compliance Division and the Office of Quality Assurance have evaluated the documentation supporting the compliance of the Central Characterization Program (CCP) TRU waste program deployed at the Idaho National Laboratory (INL) (hereinafter referred to as INL-CCP).

**PROGRAM STATUS**

- All program elements remain complete.
- The following site program documents are current and comply with the CBFO requirements\*:
  - **CCP-PO-001, Revision 21, CCP Transuranic Waste Characterization Quality Assurance Project Plan,**  
CBFO Approval - CBFO:NTP:JRS:PG:13-0487:UFC 5900.00 dated April 17, 2013;
  - **CCP-PO-001, Revision 22, CCP Transuranic Waste Characterization Quality Assurance Project Plan,**  
CBFO Approval - CBFO:NTP:JRS:GL:16-1809:UFC 5900.00 approved January 13, 2016;
  - **CCP-PO-002, Revision 27, CCP Transuranic Waste Certification Plan,**  
CBFO Approval - CBFO:NTP:JRS:PG:13-0593:UFC 5900.00 dated May 31, 2013;
  - **CCP-PO-003, Revision 13, CCP Transuranic Authorized Method for Payload Control,**  
CBFO Approval - CBFO:NTP:JRS:GL:13-0671:UFC 5900.00 dated July 29, 2013;  
and
  - **CCP-PO-505, Revision 3, CCP Remote-Handled Transuranic Waste Authorized Methods for Payload Control,**  
CBFO Approval - CBFO:NTP:JRS:GL:14-1860:UFC 5900.00 approved March 5, 2014.

\*Note that the program documents listed above are the revisions that were audited and may not be the current revisions.

- Attachment 2 contains the list of processes/equipment from Table 1 and 2 of this memorandum certified at this site;
- Attachment 3 contains the list of the INL/CCP certified procedures/documents;
- Attachment 4 describes specific INL/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 INL/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 INL/CCP/ shall report Tier 2 changes to the CBFO on a quarterly basis; and

- Attachment 5 further describes the Waste Acceptance Criteria, Revision 8, gap analysis performed for initial waste shipment.
- The CCP participated in the following performance demonstration programs (PDPs)\*:
  - **NDA PDP – Cycle 22A approval** for radioassay of WIPP wastes contained in TRU waste drums using the WAGS (NDA PDP Registration # IN03/ING2) and SRGS (IN04/ING3) in accordance with the procedures identified as CCP-TP-019, revision 8 and CCP-TP-115, revision 6, respectively.  
Memorandum CBFO:TSTD:NC:MT:15-1005:UFC 5900.00dated July 7, 2015.
  - **NDA PDP – Cycle 22A approval** for radioassay of WIPP wastes contained in TRU waste drums using the WAGS (NDA PDP Registration # IN03/ING2) and SRGS (IN04/ING3) in accordance with the procedures identified as CCP-TP-019, revision 8 and CCP-TP-115, revision 6, respectively.  
Memorandum CBFO:TSTD:NC:MT:15-1005:UFC 5900.00dated July 7, 2015.

\*Note that the PDP cycles listed above are the revisions that were audited and may not be the current revisions.

- The CBFO conducted Recertification Audit A-14-18 of the INL-CCP on June 3-5, 2014.
  - CARs 14-044, 14-046, and 14-047 were issued on June 26, 2014.
  - CAR 14-044 was closed on July 21, 2014.
  - CAR 14-046 was closed on August 20, 2014.
  - CAR 14-047 was closed on October 7, 2014.
  - The Interim Audit Report was issued on June 27, 2014.
  - The Final Audit Report was issued to NMED on August 15, 2014.
  - The NMED approval was issued on March 17, 2017.
- The CBFO conducted Recertification Audit A-15-18 of the INL-CCP on June 16-18, 2015.
  - CAR 15-050 was issued on July 9, 2015 and closed on November 13, 2015.
  - The Interim Audit Report was issued on July 14, 2015.
  - The Final Audit Report was issued to NMED on December 3, 2015.
  - The NMED approval was issued on March 17, 2017.
- The CBFO conducted Recertification Audit A-16-18 of the INL-CCP on June 14-16, 2016.
  - CAR 16-045 was issued on June 29, 2016 and closed on August 25, 2016.
  - The Interim Audit Report was issued on July 8, 2016.
  - The Final Audit Report was issued to NMED on December 7, 2016.
  - The NMED approval was issued on March 17, 2017.

- The CBFO conducted A-15-12 on April 7-9, 2015 of the Nuclear Waste Partnership LLC (NWP)/Central Characterization Program (CCP) Quality Assurance Program.
  - CAR 15-034, 15-035, 15-036, and 15-038 were issued on April 24, 2015.
  - CAR 15-034 was closed on July 9, 2015.
  - CAR 15-035 was closed on August 18, 2015.
  - CAR 15-036 was closed on June 24, 2015.
  - CAR 15-038 was closed on August 19, 2015.
  - The Audit Report was issued on May 1, 2015.
- The CBFO conducted Audit A-16-12 on March 29-31, 2016 of the Nuclear Waste Partnership LLC (NWP)/Central Characterization Program (CCP) Quality Assurance Program.
  - CAR 16-030 was issued on April 5, 2016 and closed on September 6, 2016.
  - CAR 16-031 was issued on April 5, 2016 and closed on May 24, 2016.
  - The Audit Report was issued on April 20, 2016.
- The CBFO conducted Audit A-14-19 at Los Alamos National Laboratory on August 19-21, 2014. During the Recertification audit the activities for transportation Container Management, Flammable Gas Sampling and Analysis and Shipping Documentation was performed and found to be adequately established for compliance with the upper-tier requirements, effectively implemented, and satisfactory.
  - The Audit Report was issued on September 14, 2014.
- The CBFO Surveillance S-16-24 on February 23, 2016 of the All Sites CCP Transportation Training Activities for CH and RH.
  - The Surveillance Report was issued on February 29, 2016.
- The CBFO conducted Surveillance S-17-26 on March 7, 2017 of the Mobile Loading Unit Training at Waste Control Specialists performed for the Nuclear Waste Partnership LLC/Central Characterization Program.
  - The Surveillance Report was issued on March 20, 2017.
- The CBFO conducted Surveillance S-17-30 Readiness to Ship ID-RF-S3114 dated March 31, 2017.
- The EPA issued concurrence on the draft recertification memo on March 31, 2017 via email.

**RECOMMENDATION**

The recommendation to the CBFO Manager is to grant continued authority at the CCP at INL for TRU Waste characterization, certification, and transportation activities as identified in Table 1 of this memorandum and Surveillance S-17-30, Audits A-14-18, A-15-18, and A-16-18, subject to the following limitations and conditions:

- This recommendation applies only to the shipment of ID-RF-S3114 waste stream.

**CONCURRENCE**

  
\_\_\_\_\_  
J. R. Stroble, Director  
National TRU Program Compliance Division

3-31-17  
Date

  
\_\_\_\_\_  
Mike Brown, Director  
Office of Quality Assurance

3-31-17  
Date



<b>CENTRAL CHARACTERIZATION PROGRAM at Idaho National Laboratories List of Processes/Equipment Certified from Table's 1 and 2 of this Memorandum During Audits A-14-18, A-15-18, A-16-18</b>					
<b>WDS Method ID #</b>	<b>Site Equipment # or Title</b>	<b>Description</b>	<b>Components</b>	<b>Software</b>	<b>NDA Calibrated and TMU</b>
<b>Non-Destructive Assay</b>					
14WAGS1*	WAGS	Waste Assay Gamma Spectrometer (WAGS) Quantitative gamma acquisition system with transmission matrix corrections, multi curve density and gamma isotopic capabilities.  Operating Procedure CCP-TP-019 55 gallon drums	<ul style="list-style-type: none"> <li>• 6 BeGe detectors</li> <li>• Shielded Assay Chamber</li> <li>• 3 Ba-133 transmission sources</li> <li>• 6 Digital Spectrum Analyzers 1000</li> <li>• Pulser</li> </ul>	<ul style="list-style-type: none"> <li>• NDA 2000, Version 4.0 (MGA.exe and MGA-U.exe are tracked as part of NDA 2000)</li> <li>• Genie 2000, Version 3.0</li> </ul>	Calibration for the WAGS is discussed in CCP-INL-WAGS-001, Revision 1 and CCP-INL-WAGS-003, Revision 0. For the WAGS the calibrated range and operational ranges are synonymous. CCP-INL-WAGS-08-002, "Waste Assay Gamma Spectrometer Multi-Curve Efficiency Calibration Extension Addendum" extends the density range.  The TMU for the WAGS is documented in CCP-INL-WAGS-002, "Total Measurement Uncertainty for the WAGS System."
14SGRS1*	SWEPP SGRS	Stored Waste Examination Pilot Plant (SWEPP) Gamma Ray Spectrometer (SGRS)  Quantitative gamma acquisition system with multi-curve density and gamma isotopic capabilities.  Operating Procedure CCP-TP-115 55 gallon drums	<ul style="list-style-type: none"> <li>• 4 BeGe detectors</li> <li>• Shielded Assay Chamber</li> <li>• 1 Pulser</li> <li>• 4 Digital Spectrum Analyzers</li> </ul>	<ul style="list-style-type: none"> <li>• NDA 2000, Version 4.0 (MGA.exe and MGA-U.exe are tracked as part of NDA 2000)</li> <li>• Genie 2000, Version 3.0</li> </ul>	The calibration for the SGRS is discussed in CCP-INL-SGRS-001, Revision 1. For the SGRS the calibrated range and operational ranges are synonymous.  The TMU for the SGRS is documented in CCP-INL-SGRS-0002, "Total Measurement Uncertainty for the SGRS System."
<b>Dose-to-Curie</b>					
14DTC1	Dose-to-Curie	Radiological characterization process using dose-to-curie (DTC) and modeling-derived scaling factors for assigning radionuclide values to RH waste streams for which the scaling factors are applicable, as described in the waste stream specific radiological reports.  Dose-rate fractional contribution of Cs-137 and Co-60 using OSPREY™ La <sub>3</sub> Br(Ce) gamma detector  Procedure CCP-TP-504	As identified in CCP-TP-504	As identified in CCP-TP-504	N/A
14601C2	CCP-RC-INL-601	Radiological characterization	As identified in CCP-RC-INL-601	N/A	N/A

<b>CENTRAL CHARACTERIZATION PROGRAM at Idaho National Laboratories</b> <b>List of Processes/Equipment Certified from Table's 1 and 2 of this Memorandum</b> <b>During Audits A-14-18, A-15-18, A-16-18</b>					
<b>WDS Method ID #</b>	<b>Site Equipment # or Title</b>	<b>Description</b>	<b>Components</b>	<b>Software</b>	<b>NDA Calibrated and TMU</b>
14631C3	CCP-RC-INL-631	analysis using ORIGEN2.2 Radiological characterization neutron dose-to-curie (DTC) method by confirmation	As identified in CCP-RC-INL-631	N/A	N/A
<b>Visual Examination</b>					
14RHVE1	Audio/video review/VE Technique	Visual Examination Technique (VET) to characterize RH TRU SCGs S3000, S4000, and S5000 waste.  Procedure CCP-TP-500	N/A	N/A	N/A
14VE1	ARP Packaging Stations	Visual Examination Technique for newly generated waste and repackaging of waste produced from the retrieval of buried waste at the Idaho National Laboratory  Procedure CCP-TP-006	N/A	N/A	N/A
<b>Non-Destructive Examination</b>					
14RRH1	RTR-RTR-0659	Real-time Radiography Characterization System [built by VJ Technologies]  Procedure CCP-TP-508	<ul style="list-style-type: none"> <li>• X-ray imaging system including x-ray tube, image intensifier, and video camera</li> <li>• Video/audio recording equipment</li> <li>• Fixed platform</li> </ul>	N/A	N/A
<b>Gas Generation</b>					
14GG1	Gas Generation Testing	Gas Generation Testing, 55 gallon drums  CCP-TP-083	<ul style="list-style-type: none"> <li>• MGSS Unit/Cart 1 (GC-14B)</li> </ul>	N/A	N/A
14GG2	Gas Generation Testing	Gas Generation Testing, 55 gallon drums  CCP-TP-083	<ul style="list-style-type: none"> <li>• MGSS Unit/Cart 2 (GC-17A)</li> </ul>	N/A	N/A
*NOTE: Equipment must remain in compliance with the PDP program to certify waste.					

<b>CENTRAL CHARACTERIZATION PROJECT at IDAHO NATIONAL LABORATORY</b>			
<b>LIST OF CERTIFIED PROCEDURES/DOCUMENTS</b>			
<b>During Audits A-14-18, A-15-18, and A-16-18</b>			
<b>(Items in red represents new procedure/documents)</b>			
<b>#</b>	<b>Procedure No.</b>	<b>Rev No.*</b>	<b>Procedure Title</b>
1.	CCP-PO-001	22	CCP Transuranic Waste Characterization Quality Assurance Project Plan
2.	CCP-PO-002	27	CCP Transuranic Waste Certification Plan
3.	CCP-PO-003	14	CCP Transuranic Authorized Methods for Payload Control (CCP CH-TRAMPAC)
4.	CCP-PO-005	27	CCP Conduct of Operations
5.	CCP-PO-016	6	CCP Gas Generation Testing Quality Assurance Project Plan
6.	CCP-PO-024	15	CCP/INL Interface Document
7.	CCP-PO-501	9	CCP/INL RH TRU Waste Interface Document
8.	CCP-PO-505	3	CCP Remote-Handled Transuranic Waste Authorized Methods for Payload Control (CCP-RH-TRAMPAC)
9.	CCP-QP-001	8	CCP Graded Approach
10.	CCP-QP-002	40	CCP Training and Qualification Plan
11.	CCP-QP-005	25	CCP TRU Nonconforming Item Reporting and Control
12.	CCP-QP-008	25	CCP Records Management
13.	CCP-QP-010	25	CCP Document Preparation, Approval, and Control
14.	CCP-QP-014	7	CCP Quality Assurance Trend Analysis and Reporting
15.	CCP-QP-015	12	CCP Procurement
16.	CCP-QP-016	21	CCP Control of Measuring and Testing Equipment
17.	CCP-QP-017	4	CCP Identification and Control of Items
18.	CCP-QP-018	11	CCP Management Assessment
19.	CCP-QP-019	8	CCP Quality Assurance Reporting to Management
20.	CCP-QP-021	10	CCP Surveillance Program
21.	CCP-QP-022	16	CCP Software Quality Assurance Plan
22.	CCP-QP-023	4	CCP Handling, Storage and Shipping
23.	CCP-QP-026	14	CCP Inspection Control
24.	CCP-QP-027	6	CCP Test Control
25.	CCP-QP-028	16	CCP Records Filing, Inventorying, Scheduling, and Dispositioning
26.	CCP-QP-030	9	CCP Written Practice for the Qualification of CCP Helium Leak Detection Personnel
27.	CCP-QP-032	2	CCP Written Practice for the Qualification of CCP Pressure Change Leak Testing Personnel
28.	CCP-TP-001	21	CCP Project Level Data Validation and Verification
29.	CCP-TP-002	26	CCP Reconciliation of DQOs and Reporting Characterization Data
30.	CCP-TP-005	28	CCP Acceptable Knowledge Documentation
31.	CCP-TP-006	20	CCP Visual Examination Technique for INL Newly Generated TRU Waste
32.	CCP-TP-010	5	CCP Waste Assay Gamma Spectrometer (WAGS) & SWEPP Gamma Ray Spectrometer (SRGS) Calibration Procedure
33.	CCP-TP-019	8	CCP Waste Assay Gamma Spectrometer (WAGS) Operating Procedure
34.	CCP-TP-028	9	CCP Radiographic Test Drum and Training Container Construction
35.	CCP-TP-030	34	CCP CH TRU Waste Certification and WWIS/WDS Data Entry
36.	CCP-TP-033	22	CCP Shipping of CH TRU Waste
37.	CCP-TP-058	6	CCP NDA Performance Demonstration Program
38.	CCP-TP-068	12	CCP Standardized Container Management
39.	CCP-TP-082	10	CCP Waste Container Filter Vent Operation
40.	CCP-TP-083	8	CCP Gas Generation Testing
41.	CCP-TP-109	9	CCP Data Reviewing, Validating, and Reporting Procedure
42.	CCP-TP-113	19	CCP Standard Contact-Handled Waste Visual Examination
43.	CCP-TP-115	6	CCP SWEPP Gamma-Ray Spectrometer (SGRS) Operating Procedure
44.	CCP-TP-138	2	CCP Execution of Long-Term Objective for the Unified Flammable Gas Test Procedure
45.	CCP-TP-163	4	CCP Evaluation of Waste Packaging Records for Visual Examination of Records
46.	CCP-TP-500	15	CCP Remote-Handled Waste Visual Examination
47.	CCP-TP-504	18	CCP Dose-to-Curie Survey Procedure for Remote-Handled Transuranic Waste
48.	CCP-TP-506	5	CCP Preparation of the Remote-Handled Transuranic Waste Acceptable Knowledge Characterization Reconciliation Report
49.	CCP-TP-507	8	CCP Shipping of Remote-Handled Transuranic Waste
50.	CCP-TP-508	11	CCP RH Standard Real-Time Radiography Inspection Procedure
51.	CCP-TP-509	6	CCP Remote-Handled Transuranic Container Tracking

<b>CENTRAL CHARACTERIZATION PROJECT at IDAHO NATIONAL LABORATORY</b>			
<b>LIST OF CERTIFIED PROCEDURES/DOCUMENTS</b>			
<b>During Audits A-14-18, A-15-18, and A-16-18</b>			
<b>(Items in red represents new procedure/documents)</b>			
<b>#</b>	<b>Procedure No.</b>	<b>Rev No.*</b>	<b>Procedure Title</b>
52.	CCP-TP-512	6	CCP Remote-Handled Waste Sampling
53.	CCP-TP-530	12	CCP RH TRU Waste Certification and WWIS/WDS Data Entry

\*Revision in effect at the time of the audit.  
NOTE: Any changes to procedures that affect performance criteria or data quality, testing procedures, quality assurance objectives, calibration requirements, or QC sample acceptance criteria comply with the WIPP HWFP WAP (Attachment C) and shall not be made without prior approval of the CBFO.

**Table 1. Tiering of Contact-Handled Transuranic Waste Characterization Processes Implemented by INL-CCP (Based on May 3–5, 2005, Baseline Inspection and Subsequent Evaluations, Updated June 2014)**

Process Elements	INL-CCP CH Waste Characterization Processes – T1 Changes	INL-CCP CH Waste Characterization Processes – T2 Changes*
Acceptable Knowledge, including Load Management	Any new waste category Changes to the accelerated retrieval project targeted wastes from what was presented in CCP-AK-INL-001, Revision 7	Submission of a list of active INL-CCP CH AKEs and SPMs Notification to EPA upon completion of or substantive modification** to: <ul style="list-style-type: none"> <li>• AK-NDA memoranda</li> <li>• AK accuracy reports (annually, at a minimum)</li> <li>• AK-AK and AK-NDA/NDE discrepancy resolution reports</li> <li>• WSPFs, including updates or additions to waste streams within an approved waste category</li> <li>• New and revised AK summary reports</li> <li>• The load management status of approved waste streams</li> <li>• Site procedures requiring CBFO approval</li> <li>• Any analysis evaluating effectiveness of the Waste Identification Process</li> </ul>
Nondestructive Assay	New equipment or substantive physical modifications** to approved equipment Extension of or changes to approved calibration range for approved equipment	<b>Submission of a list of INL-CCP NDA operators, EAs and ITRs that performed work during the previous quarter</b> Notification to EPA upon substantive modification** to: <ul style="list-style-type: none"> <li>• Software for approved equipment</li> <li>• Operating ranges upon CBFO approval</li> <li>• Site procedures requiring CBFO approval</li> </ul>
Real-Time Radiography	None	<b>Submission of a list of INL-CCP RTR operators and ITRs that performed work during the previous quarter</b> Notification to EPA upon: <ul style="list-style-type: none"> <li>• Substantive modification** to site procedures requiring CBFO approval</li> <li>• New equipment or substantive physical modifications** to approved equipment</li> </ul>
Visual Examination and Visual Examination Technique	Changes in the vendor performing visual examination or visual examination technique	<b>Submission of a list of INL-CCP VE operators, VE Experts and ITRs that performed work during the previous quarter</b> Notification to EPA upon substantive modification** to site procedures requiring CBFO approval
WIPP Waste Data System	Changes to WDS algorithms specific to load management requiring revisions to the load management provisions of DOE’s CH WAC	Notification to EPA upon substantive modification** to: <ul style="list-style-type: none"> <li>• Site procedures requiring CBFO approval</li> <li>• WDS algorithms corresponding to changes to the load management provisions of the CH WAC</li> </ul>

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.

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

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

**Waste Acceptance Criteria, Revision 8, Gap Analysis for Initial Waste Shipment**

Based on the recent *Waste Acceptance Criteria (WAC) Revision 8* (July 2016) and the new Waste Isolation Pilot Plant (WIPP) *Documented Safety Analysis (DSA)* (May 2016), the CBFO is required to verify additional requirements that were not reviewed in the previous audit. The CBFO performed an additional surveillance (S-17-30) to ensure these new requirements have been audited (gap analysis). This gap analysis was specifically limited to only the requirements for shipping and certification of waste stream ID-RF-S3114.

The following requirements were not audited/ surveilled because they are not required for this waste stream:

- Certified Program approval of *Interface Waste Management Document List (IWMDL)* – this is not required as the subject waste stream is not a new waste stream that mandates an IWMDL verification.
- Generator Site process to ensure changes to IWMDL procedures require Certified Program approval prior to implementation – this is not required as the subject waste stream is not a new waste stream that mandates an IWMDL verification.
- Basis of Knowledge process – this is not required as the subject waste stream does not contain oxidizers.

Based on the prior Recertification audits and this gap analysis surveillance, the characterization, quality assurance, and transportation activities of the contact-handled Summary Category Groups (SCG) S3000 homogeneous solids, S4000 soils/gravel, and S5000 debris wastes were determined to be adequate, satisfactorily implemented, and effective.