

Table 1. Tiering of Contact-Handled Transuranic Waste Characterization Processes Implemented by LANL-CCP (Based on February 7-9, 2017, Baseline Inspection and Subsequent Evaluations, Updated April 2019)

Process Elements	LANL-CCP Waste Characterization Process – T1 Changes	LANL-CCP Waste Characterization Process – T2 Changes*
Acceptable Knowledge, including Load Management	<p>Any implementation of payload management</p> <p>Characterization of SCG S4000 waste (removed based on review during this inspection)</p>	<p>Submission of a list of active LANL-CCP CH AKEs and SPMs that performed work during the previous quarter</p> <p>Notification to the EPA upon completion of or substantive modification** to:</p> <ul style="list-style-type: none"> • CCP-TP-005, Attachments 6, 7, 8 and 9, and associated memoranda (i.e., WMP, AK-NDA, add-container memoranda) • AK accuracy reports (annually, at a minimum) • AK reassessment memoranda and Discrepancy Resolution Reports • WSPFs and any associated change notices • AKSRs • Site procedures requiring CBFO approval • Enhanced AK documents such as AKAs (including addition of new figures), CCEMs and BOK memoranda
Nondestructive Assay	<p>New equipment or substantive physical modifications** to approved equipment</p> <p>Extension of or changes to approved calibration ranges for approved equipment</p>	<p>Submission of a list of LANL-CCP NDA operators, EAs and ITRs that performed work during the previous quarter</p> <p>Notification to the EPA upon substantive modification** to:</p> <ul style="list-style-type: none"> • Software for approved equipment • Operating ranges upon CBFO approval • Site procedures requiring CBFO approval
Real-Time Radiography	<p>New equipment or substantive physical modifications** to approved equipment</p> <p>Implementation of any real-time radiography process for SCG S4000 waste</p>	<p>Submission of a list of LANL-CCP RTR operators and ITRs that performed work during the previous quarter</p> <p>Notification to the EPA upon substantive modification** to site procedures requiring CBFO approval</p>
Visual Examination	<p>Implementation of any visual examination process for SCG S4000 waste</p>	<p>Submission of a list of LANL-CCP VE operators, VE Experts and ITRs that performed work during the previous quarter</p> <p>Notification to the EPA upon substantive modification** to site procedures requiring CBFO approval, including OSRP visual examination technique procedure</p>

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 the 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. The EPA may request copies of new references that DOE adds during a document revision.