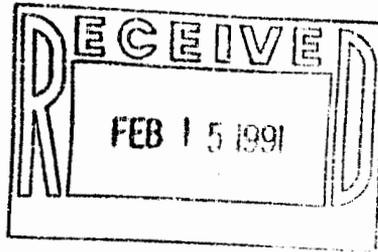


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Waste Acceptance Criteria Certification Committee Management Program

September 1990

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Waste Acceptance Criteria Certification Committee Charter

Approvals

Harold J. Davis

WACCC Chairperson, DOE / WPO

Arden Hunt

Project Manager, DOE/WPO

9-28-90

C H A R T E R

WASTE ACCEPTANCE CRITERIA CERTIFICATION COMMITTEE

The purpose of the Waste Acceptance Criteria Certification Committee (WACCC) Charter is to clearly delineate management responsibility, authority and accountability for the committee.

The WACCC is established by DOE Order 5820.2A, Paragraph 8.k, "...Within the Albuquerque Operations Office, a standing committee, the Waste Isolation Pilot Plant-Waste Acceptance Criteria Certification Committee, is responsible for review, audit, and approval of generator transuranic waste certification programs and activities....."

The responsibility of the WACCC is to:

- a. Develop and maintain the Waste Acceptance Criteria (WAC) which is the criteria used to certify compliance of waste being shipped to the Waste Isolation Pilot Plant (WIPP).
- b. Provide the mechanism to assure that all TRU waste shipped between TRU waste generator/storage sites and to the Waste Isolation Pilot Plant (WIPP) meets all applicable criteria. Criteria include requirements for shipment and transportation in Nuclear Regulatory Commission (NRC) certified packages and all other applicable criteria for the receipt of waste at WIPP.

This charter and associated management plan shall be approved by the Project Manager of the Department of Energy's (DOE's) WIPP Project Office.

The Waste Acceptance Criteria (WAC) shall be approved by the DOE/Headquarters (HQ) Environmental Restoration and Waste Management (EM).

The Assistant Manager for Energy and Special Programs, DOE Albuquerque Operations Office, is the top level for programmatic responsibility and accountability.

The WACCC shall have a Chairperson who shall be a DOE employee and who is accountable to the Assistant Manager for System Integration.

The WACCC shall have Lead Auditors, designated in writing by the WACCC Chairperson, who support the WACCC Chairperson for audit and surveillance coordination.

The WACCC shall have a Waste Technology Group Manager who is accountable to the Management and Operating Contractor (MOC) General Manager and who supports the WACCC Chairperson.

The implementation and management of this charter shall be defined and described in a WACCC Management Plan.



**Waste Acceptance Criteria
Certification Committee
Management Program**

Approvals

Harold Davis

WACCC Chairperson, DOE / WPO

Allen Hunt

Project Manager, DOE/WPO

9-28-90

INDEX

PAGE

LIST OF ACRONYMS ii

1.0 INTRODUCTION 1

2.0 FUNCTIONS OF THE WASTE ACCEPTANCE CRITERIA
CERTIFICATION COMMITTEE 1

3.0 FUNCTIONAL RESPONSIBILITIES 4

 3.1 WACCC CHAIRPERSON 4

 3.2 WASTE TECHNOLOGY GROUP 6

 3.3 WACCC AUDIT/SURVEILLANCE GROUP 10

4.0 WACCC STRUCTURE 11

5.0 PROGRAM ADMINISTRATION 13

 5.1 REVIEW PROCESS FOR TRU WASTE
 CERTIFICATION PLANS. 13

6.0 AUDITS/SURVEILLANCES. 15

 6.1 CERTIFICATION AUDITS 15

 6.2 COMPLIANCE VERIFICATION AUDITS 17

 6.3 UNANNOUNCED AUDITS 17

 6.4 SITE SURVEILLANCES 18

 6.5 AUDIT FREQUENCY. 19

 6.6 AUDIT ENTRANCE AND EXIT MEETINGS 20

 6.7 AUDIT REPORTS. 21

7.0 SITE REVIEWS 22

 7.1 SITE TRU WASTE PROGRAM REVIEWS 22

8.0 WACCC DOCUMENT CONTROL 23

 8.1 WACCC ACTIVITIES AND WAC DOCUMENT
 TRACKING SYSTEM. 23

 8.2 FORMAL APPROVAL LETTER 24

 8.3 DOCUMENT TRANSMITTAL TO NM EID AND EEG 24

9.0 WAC IWG 25

10.0 CRITERIA ASSESSMENT 25

11.0 DEFINITIONS 26

12.0 REGULATORY AND GUIDANCE DOCUMENTS 28

FIGURE 1. WACCC STRUCTURE. 12

LIST OF ACRONYMS

ASG	Audit/Surveillance Group
C of C	Certificate of Compliance
CH	Contact Handled
DOE	Department of Energy
DOE/HQ	Department of Energy/Headquarters
EEG	Environmental Evaluation Group
NMEID	New Mexico Environmental Improvement Division
EM	Environmental Restoration and Waste Management
EPA	Environmental Protection Agency
IWG	Interface Working Group
MOC	Management and Operating Contractor
NDA/NDE	Nondestructive Assay/Nondestructive Examination
OCC	Office of Chief Counsel
PA	Performance Assessment
QA	Quality Assurance
QRAB	Quality and Regulatory Assurance Branch
QRABC	Quality and Regulatory Assurance Branch Chief
RCRA	Resource Conservation and Recovery Act
RH	Remote Handled
RTBC	Repository Technology Branch Chief
RTR	Real-Time Radiography
SARP	Safety Analysis Report for Packaging
TBD	To Be Determined
TRT	Technical Review Team
TRU	Transuranic
TRUPACT-II	Transuranic Package Transporter
WAC	Waste Acceptance Criteria
WAC IWG	Waste Acceptance Criteria Interface Working Group
WACCC	Waste Acceptance Criteria Certification Committee
WIPP	Waste Isolation Pilot Plant
WTG	Waste Technology Group
WWIS	WIPP Waste Information System

WACCC MANAGEMENT PLAN

1.0 INTRODUCTION

This document describes the implementation of the Waste Acceptance Criteria Certification Committee (WACCC) Charter.

The WACCC is the name of the standing committee established by DOE Order 5820.2A. The Committee shall have two disciplines, technical and audit/surveillance. This management plan describes how the WACCC is to be managed, operated, and administered, and it establishes the functional responsibilities and organization for the WACCC.

2.0 FUNCTIONS OF THE WASTE ACCEPTANCE CRITERIA CERTIFICATION COMMITTEE

The functions of the WACCC are:

Waste Technology Group

2.1 Propose, maintain, develop, and document Waste Acceptance Criteria (WAC) that are limiting parameters on waste and waste packaging transported to and received at WIPP, and verify that limits are met. The WACCC will also propose the incorporation of provisions needed to ensure that the WIPP facility will meet applicable Resource Conservation and Recovery Act (RCRA) and Performance Assessment (PA) requirements.

Audit Surveillance Group

2.2 Verify compliance with transportation criteria for transportation of TRU waste between generator/storage sites and to WIPP.

2.3 Perform the following activities associated with the WIPP Experimental Waste Characterization Program Task Plan during the Test Phase:

Authority of the Audit Surveillance Group

- 1) Surveillance of the development of the Quality Assurance Program Plan (QAPP) and approval of the Quality Assurance Project Plans (QAPjPs) to assure the QAPjPs include all requirements of the QAPP.
- 2) Audit sites' compliance with the approved Project Quality Assurance Plans (QAPjP) and Standard Operating Procedures (SOPs).
- 3) Verify, through periodic surveillances conducted at the operating DOE Sites, that test bins are loaded in accordance with approved procedures.
- 4) Verify, through periodic surveillances conducted at the operating DOE Sites, that test bins are leak tested to the requirements of approved procedures.
- 5) Audit or surveil sites' compliance with approved Readiness Review Program Plan.

2.4 Review and approve site specific compliance documents that describe how the site will address all the waste acceptance criteria. Compliance with the approved site specific compliance document will be audited by the WACCC.

- 2.5 Conduct and coordinate field audits and surveillances, scheduled and unannounced, to ensure that the waste packaging, transportation, and QA plans are properly implemented.
- 2.6 Establish tracking systems for all action items (including WACCC related document reviews) for the WACCC to ensure timely resolution of findings, observations, and recommendations from audits and surveillances, and the resultant corrective actions.
- 2.7 Establish a method of trend analyses of program deficiencies noted in audits and surveillances to identify recurring problems, and provide corrective action recommendations to prevent recurrence.
- 2.8 Integrate WACCC activities among generator/storage sites, interface working groups, and major project participants to ensure that the sites' operations are in compliance with all requirements.
- 2.9 Review and evaluate, at least annually, the overall WACCC program for: (a) adequate criteria, (b) adequate staffing, and (c) proper number of audits. The findings shall be reported to the WACCC Chairperson and a report shall be prepared for the DOE/WPO Project Manager.
- 2.10 Establish administrative controls (procedures) to integrate all areas of responsibility of the WACCC.
- 2.11 Grant or suspend TRU sites' waste certification authority and/or TRU waste transportation (e.g., TRUPACT-II) authority.
- 2.12 Interface, through officially established channels, with federal, state, and other oversight groups regarding WACCC and WAC matters.

- 2.13 Advise TRU waste generating/storage sites of EM-approved changes in the WAC regarding RCRA, PA, and packaging requirements. The WACCC will be kept apprised of such proposed changes through the membership on the WACCC of personnel with expertise in these areas.
- 2.14 Communicate with interface working groups (e.g., NDA/NDE IWG, RH IWG) on concerns that are applicable to TRU waste certification and transportation.
- 2.15 Issue periodic reports documenting current activities and program status of the WACCC, including audit/surveillance and site review reports.
- 2.16 Coordinate changes to the WAC and other applicable criteria affecting the WAC with generator/storage sites and all other involved parties.

3.0 FUNCTIONAL RESPONSIBILITIES

The WACCC shall consist of the Chairperson and two separate support groups: (1) the Waste Technology Group (WTG) and, (2) the Audits/Surveillances Group (ASG).

3.1 WACCC Chairperson

- 3.1.1 The WACCC Chairperson shall be a DOE employee with an engineering or physical science background who is selected by the DOE WIPP Project Manager and reports to the Assistant Manager for System Integration.
- 3.1.2 All WACCC activities shall be under the control and

approval of the WACCC Chairperson, including establishing administrative controls (procedures) to integrate all areas of responsibility of the WACCC.

- 3.1.3 The WACCC Chairperson shall identify, request, and manage the funding required to operate the WACCC organization.
- 3.1.4 The WACCC Chairperson shall establish and maintain a records management system as defined in Section 8.1 utilizing administrative support.
- 3.1.5 The WACCC Chairperson, for WACCC and WAC matters, communicates with the New Mexico Environmental Improvement Division (NM EID) and the Environmental Evaluation Group (EEG). Procedurally, the Environment, Safety and Health Branch of the DOE/WPO provides the official line of communication for the NM EID. The Repository Technology Branch of the DOE/WPO provides the official line of communication for the EEG. The Office of Chief Counsel reviews all written correspondence with these two organizations.
- 3.1.6 The WACCC Chairperson shall communicate through the DOE Field/Area Offices with personnel from host states, NM EID, and EEG concerning participation of their observers on audits and surveillances.
- 3.1.7 The WACCC Chairperson will approve participation in audits of all observers (state, regulatory personnel, and auditor trainees for future audits).

- 3.1.8 The WACCC Chairperson shall have the responsibility and authority to suspend sites' shipments or revoke the certification program based upon severity of program deficiencies.
- 3.1.9 The WACCC Chairperson shall be responsible for coordination of audit and surveillance functions, and unannounced audits.
- 3.1.10 The WACCC Chairperson shall prepare an annual report for the DOE/WPO Project Manager after a review and evaluation of the overall WACCC program. The report will include the adequacy of the criteria, staffing, and number of audits.

3.2 Waste Technology Group

The WTG shall be the technical side of the WACCC, and is responsible for the review, comment, and apprising the WACCC Chairperson of the acceptability of the generator/storage sites certification plans.

The WTG will be a combination of permanent and matrixed members with expertise in specified disciplines and shall be provided by the Management and Operating Contractor (MOC). The MOC will choose WTG members with the necessary expertise to satisfy established criteria.

The disciplines for the WTG members will include, but are not limited to, the following:

- Quality Assurance (QA)
- Waste Operations
- Health Physics
- Databases (e.g., WWIS)
- NDA/NDE (RTR and Assay)

Resource Conservation and Recovery Act (RCRA)
Performance Assessment (PA)
Transportation and Packaging
Waste Characterization (e.g., sampling and analysis; and
data documentation to satisfy QA requirements)

3.2.1 Waste Technology Group Manager

The WTG Manager shall be selected by the Management and Operating Contractor (MOC).

3.2.1.1 The WTG Manager shall coordinate all the activities of the WTG.

3.2.1.2 The WTG Manager will recommend to the WACCC Chairperson when to convene the WAC IWG.

3.2.1.3 The WTG Manager shall recommend to the WACCC Chairperson when to convene a contingent of experts, the Technical Expertise Group, to resolve conflicts in imminent TRU waste process changes or to resolve events that occur which are beyond the capability of the expertise of the WTG members.

3.2.2 WTG Responsibilities

3.2.2.1 The WTG will make a recommendation to the WACCC Chairperson on the acceptability of any proposed change from a generator/storage site in their waste certifying, packaging, and transportation methods, prior to the final approval by the WACCC Chairperson and implementation of such a change.

- 3.2.2.2 The WTG will receive for review and comment regarding acceptability of all generator/storage sites waste packaging, transportation, and applicable QA plans, and any changes or revisions to these plans.
- 3.2.2.3 The WTG will provide to the WACCC Chairperson recommended guidance to the Lead Auditor to support the scheduling and development of objectives for audits and surveillances (scheduled and unannounced) of waste packaging, transportation and applicable QA plans at the various generator/storage sites.
- 3.2.2.4 The WTG will review and evaluate, as needed, changes that could impact waste acceptance criteria in the TRU waste system (including transportation, RCRA, and Performance Assessment). The WTG will recommend to the Chairperson proposed criteria revision.
- 3.2.2.5 The WTG will recommend to the WACCC Chairperson whether to grant conditional or formal approval of waste packaging, transportation, and applicable QA plans and associated activities at each generator/storage site. The WTG also can recommend the suspension of the same if so warranted.

3.2.2.6 The WTG members will participate on audit teams when their particular expertise is required, but only in a minority number.

3.2.2.7 The WTG shall review RCRA, PA, and transportation requirements for possible changes to the Waste Acceptance Criteria.

3.2.2.8 The WTG shall communicate with the generator/storage sites regarding concerns that are applicable to TRU waste certification and transportation, including "lessons learned."

3.2.2.9 The WTG shall be provided all documentation associated with corrective action closures resulting from a Technical Review Team (TRT) review which may affect compliance of a NRC certified shipping container. (The TRT is an ad hoc committee established and administered by the MOC which convenes to provide technical review whenever resolution is required regarding the continued use of a TRUPACT-II container.)

3.2.3 Waste Acceptance Criteria Interface Working Group (WAC IWG)

The WAC IWG will be made up of cognizant personnel from each generator/storage site, WTG, and DOE.

When the group is formed, a mission and charter will be established to define the activities of the WAC IWG.

3.2.3.1 The WAC IWG will be convened for the purpose of reviewing and discussing proposed changes in the waste acceptance criteria and the impacts to respective sites.

3.2.3.2 The WTG Manager will recommend to the WACCC Chairperson when to convene the WAC IWG.

3.3 WACCC Audit/Surveillance Group

The WACCC Audit/Surveillance Group (ASG) shall perform the audits and surveillances of the generator/storage sites for compliance with certification plans.

3.3.1 ASG Responsibilities

3.3.1.1 The ASG Audit Teams will be led by a qualified Lead Auditor, designated in writing by the WACCC Chairperson.

3.3.1.2 The ASG will be responsible for assuring that all generator site certification plans agree with actual processes at the sites.

- 3.3.1.3 The ASG shall be responsible for the auditing and surveillance functions of the WACCC.
- 3.3.1.4 The ASG shall support the auditing activities, as described in Section 6.0.
- 3.3.1.5 During an audit, audit observers, although not part of the audit team, will be encouraged to submit comments to the Lead Auditor.
- 3.3.1.6 The ASG shall be composed of personnel that are knowledgeable of the national TRU waste system and have expertise in specified disciplines per the requirements of Appendix 18A-1 of ASME NQA-1, 1989 edition, Section 3, "Preparation for Auditing."
- 3.3.1.7 The role of the audit and surveillance personnel will include interviewing site personnel, reviewing records and documents, observing waste generating and certifying processes, and other activities deemed necessary by the Lead Auditor to meet the objectives of the audit or surveillance.

4.0 WACCC STRUCTURE

Figure 1 shows the WACCC structure. Interfaces are indicated with dashed lines.

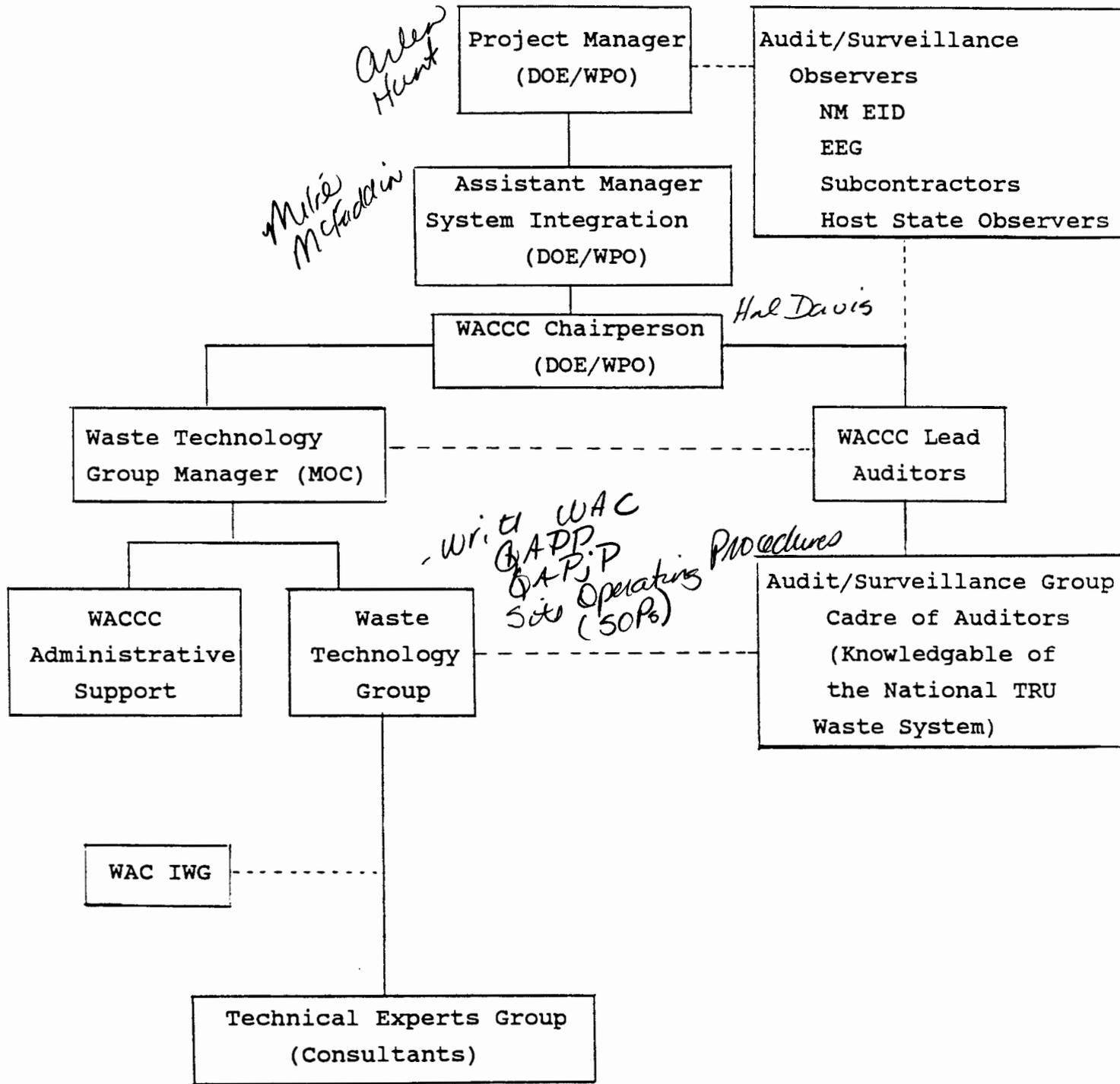


Figure 1. WACCC Structure

5.0 PROGRAM ADMINISTRATION

Generator/storage sites prepare plans documenting how they will comply with the Waste Acceptance Criteria. The criteria includes criteria for waste acceptance at WIPP, transportation of the waste, compliance with the RCRA, and fulfillment of PA requirements. Current WAC (e.g., WIPP/DOE-069) will be modified to include the current WAC, RCRA requirements, PA requirements, and transportation requirements into one new Waste Acceptance Criteria document for WIPP.

5.1 Review Process For TRU Waste Certification Plans

5.1.1 TRU waste generators or stored TRU waste certifiers submit certification plans, documenting how they comply with the WAC, to the WACCC Chairperson through the DOE Field/Area Offices. The WACCC Administrative Assistant receives and logs the plans into the WACCC tracking and filing system. The Administrative Assistant distributes copies of the plan(s) to the WTG members for review and comment. A WACCC Review Sheet accompanies each copy of the plan(s) which defines (a) the requested action; (b) the due date for comments; (c) the responsible individual who will provide comments on the submitted plans; and (d) and reference to applicable criteria.

5.1.2 The WTG with the WACCC Chairperson's approval schedules a WACCC meeting, including the ASG, to discuss the review comments. This meeting shall occur within 15 working days of receipt of the plan. The WTG members develop an integrated set of written comments.

- 5.1.3 A review response letter is prepared that contains the integrated WTG comments, including reference to the applicable criteria. This letter is approved by the WACCC Chairperson and transmitted to the sites, within 30 working days of receipt of the plan. The letter requests that the generator/storage site respond to the comments, and, where necessary, revise the draft plans to reflect the WTG comments.
- 5.1.4 The generator/storage site shall evaluate, resolve, and, as required, revise the plans within 30 working days. The revised plans shall be transmitted to the WACCC Chairperson via the cognizant DOE Field/Area Office.
- 5.1.5 When satisfied with comment resolutions, a Conditional Approval Letter is prepared (prior to a certification audit), within 15 working days of receipt of revised plans, for approval by the WACCC Chairperson in order that waste generator/storage site implementing operations may proceed.
- 5.1.6 After a Conditional Approval Letter has been sent to the generator/storage site, the revised plan (if revision of the plan is required) is then sent by the WACCC Chairperson, in accordance with Section 8.3.1, to the NM EID and the EEG for review and comment. When all comments are resolved, a Formal Approval Letter is prepared for approval by the WACCC Chairperson and sent to the generator/storage site via the cognizant DOE Field/Area Office.
- 5.1.7 Any revisions or changes to a formally approved waste packaging, transportation, or QA plan must be

resubmitted to the WACCC Chairperson via the DOE Field/Area Offices for review by the WTG. When the WACCC Chairperson has approved the revisions or changes, the revised plan will be transmitted to the NM EID and EEG in accordance with Section 8.3.1.

6.0 AUDITS/SURVEILLANCES

Audits and surveillances shall be conducted to assure generator/storage site compliance with WAC specified in WIPP/DOE-069, with approved certification plans, with specific requirements of the TRUPACT-II Certificate of Compliance (C of C), with applicable State and Federal regulations related to RCRA, and with PA requirements. Where specific technical capability is required (e.g., chemical compatibility, isotopic inventory and assay), technical experts will be included on the audit team for an in-depth audit of operations, as well as programs.

DOE Field/Area Offices will be requested to provide one observer during an audit. Also, an invitation will be extended to the host state to provide an observer on each audit.

6.1 Certification Audits

6.1.1 Once the waste packaging, transportation, and QA plans have obtained formal approval from the WACCC Chairperson, the generator/storage site must pass a WACCC Certification and Transportation Audit, by the ASG, to verify full implementation of the waste packaging, transportation compliance and associated QA plans, in addition to compliance to WAC related

RCRA and PA requirements. This is the initial generator site audit to verify satisfactory compliance with their approved plans.

- 6.1.2 The WACCC Chairperson shall provide guidance to the Lead Auditor for developing audit objectives, and the Lead Auditor, in turn, schedules and directs the ASG to prepare checklists, for Lead Auditor approval, and conduct a certification audit to verify full implementation of the waste packaging, transportation, and QA plans.
- 6.1.3 An Audit Report shall be issued to the requirements stated in Section 6.7.
- 6.1.4 The WACCC Chairperson grants formal certification and transportation authority to the generator/storage site upon satisfactory closure of a certification audit.
- 6.1.5 The TRU waste packaging, transportation, associated QA, WAC related RCRA compliance and PA compliance plans in addition to referenced procedures are to be reviewed annually by the generator/storage site for revision and changes as required. A record of this review is to be available to the WACCC Lead Auditors upon request.
- 6.1.6 The TRU waste packaging, transportation, and QA plans are to be revised by the waste generator within one year after the designation of a new organization (corporation) as the Management and Operating Contractor of the facility for DOE.

6.2 Compliance Verification Audits

- 6.2.1 After the formal approval of waste packaging, transportation, associated QA, WAC related RCRA compliance, and PA compliance plans for a waste generator/storage site, and after a WACCC certification audit has been passed, a compliance verification audit is performed by an audit team from the ASG. This is a periodic reassessment of the generator sites' performance of waste certification activities.
- 6.2.2 The WACCC Chairperson shall provide guidance to the Lead Auditor responsible for developing audit objectives. The Lead Auditor schedules and directs the audit team members to prepare checklists, for Lead Auditor approval, and conduct an audit that will, as a minimum, include evaluation of compliance with the implementing procedures of the approved certification, transportation, RCRA, PA, and QA plans. ASG audits will comply with current DOE QA requirements. Subsequent periodic audits, scheduled and unannounced, shall be conducted to verify that the site retains certification and transportation authority.
- 6.2.3 An audit report shall be issued to the requirements stated in Section 6.7.

6.3 Unannounced Audits

- 6.3.1 The DOE/HQ, Field, and Area Offices will be petitioned to grant yearly access clearance badges for all WACCC members.

- 6.3.2 The WACCC Chairperson shall provide guidance to the Lead Auditor responsible for developing audit objectives. The Lead Auditor schedules and assigns areas of responsibility to the audit team members and directs auditors to prepare formal checklists, for Lead Auditor approval, for their assigned areas that are consistent with the audit objectives. Checklists shall include verification of satisfactory disposition of previously identified open items.
- 6.3.3 The ASG will arrive at the generator/storage site at the beginning of a day's shift and will expect entry within a reasonable time. If entry is refused or delayed, DOE/HQ Environmental Restoration and Waste Management (EM) cognizant personnel will be contacted for further assistance in gaining immediate access.
- 6.3.4 An Audit Report shall be issued to the requirements stated in Section 6.7.

6.4 Site Surveillances

- 6.4.1 The WACCC Chairperson will request surveillances of generator and shipping sites to ensure the approved TRU waste packaging plans, transportation compliance plans, and QA plans are properly implemented and complied with.
- 6.4.2 After the formal approval of waste packaging, transportation, and QA plans, and after the generator/storage site has passed a WACCC

certification audit, site surveillances will be conducted to compliment the compliance verification audits.

6.4.3 The WACCC Chairperson shall provide guidance to the Lead Auditor concerning which site and which activity is to be surveilled. The Lead Auditor and/or one or more ASG surveillance personnel will be dispatched to the selected site either scheduled or unannounced to the site management. A site entrance meeting will be held to detail how the surveillance will be conducted and what will be surveilled.

6.4.4 All details of the surveillance personnel assignment will be developed by the Lead Auditor prior to arrival at the selected site. These surveillances can last from one day to several months and cover one or all of the WAC, transportation and QA requirements for certification and shipping of TRU waste to WIPP.

6.4.5 The surveillance personnel will report directly to the Lead Auditor on a predetermined basis. All findings and observations will be informally reported at the surveillance exit meeting and formally reported through the WACCC Audit Reporting System, Section 6.7.

6.5 Audit Frequency

6.5.1 Scheduled and/or unannounced audits shall be conducted a minimum of once annually at each generator/storage site.

6.5.2 The minimum audit frequency will be supplemented by additional audits, including unannounced audits, to be determined by the WACCC Chairperson in consideration of systematic requirements, site certification status, and information such as: (1) previous audit results and corrective actions, (2) nonconformance reports, (3) other independent information, including maturity of the program, and, (4) volume of waste certified and number of process lines.

6.6 Audit Entrance and Exit Meetings

- 6.6.1 A scheduled audit shall be preceded by an entrance meeting with site or facility management, at which time the Lead Auditor will identify the specific areas to be audited, the processes or functions to be observed, and the site participation required. Site or facility management may be requested to present a status briefing.
- 6.6.2 For an unannounced audit, after entry into the plant, an entrance meeting will be held with site or facility management, at which time the Lead Auditor will identify the specific areas to be audited, the processes or functions to be observed, and the site participation required.
- 6.6.3 At the conclusion of the audit (scheduled or unannounced), an exit meeting shall be conducted with site or facility management at which time the audit team will discuss preliminary findings, observations, and possible corrective actions. A formal audit report shall be prepared according to Section 6.7.

6.7 Audit Reports

- 6.7.1 A formal audit report shall be drafted by the Lead Auditor and will include input from all audit team members. This report shall be approved and transmitted by the WACCC Chairperson to the generator/storage sites within 30 working days of the completed audit.
- 6.7.2 The audit report shall receive formal approval within five (5) working days after completion of the report, prior to distribution; minimum distribution shall include the WACCC Chairperson, the NM EID, the EEG, the Host State Observer and the cognizant DOE Field/Area Office.
- 6.7.3 The audit report, at a minimum, shall include sections entitled Scope, Purpose, Summary, Findings, Observations, and Recommendations. Copies of the auditors checklists may be appended to the report and these appendices will provide documentation and detail on how each checklist item is verified as satisfactory or else is found to result in a finding, observation, or recommendation.
- 6.7.4 Audited Site Management shall respond to the WACCC Chairperson through the respective DOE Field/Area Office to all site findings and recommendations noted in the audit report, within 30 working days after receipt, indicating the corrective action taken (or to be taken) to preclude recurrence. If the corrective action has not been completed, the response must indicate the expected date the

action will be completed. Subsequent site audits (scheduled or unannounced) will determine if the corrective action has been satisfactorily implemented. These events will be tracked on the WACCC Tracking System and issued to DOE and site contractor management monthly.

7.0 SITE REVIEWS

7.1 Site TRU Waste Certification Program Reviews

- 7.1.1 Generator/storage site TRU waste certification program reviews shall be initiated by the WACCC Chairperson and conducted in conjunction with Systems Integration activities.
- 7.1.2 The reviews shall be conducted by the WTG from the integration of the Defense Transuranic Waste Program (DTWP) System perspective. These reviews will be conducted to keep the WTG up to date on the generator/storage sites' activities.
- 7.1.3 Areas to be reviewed, established by the WTG, shall be consistent with the DTWP program goals, and transmitted to the cognizant site personnel prior to the WTG arrival.
- 7.1.4 A review report will be generated to detail such items as:
- A. Development work in progress
 - B. Problem areas and recovery
 - C. Cognizant personnel
 - D. Lessons learned
 - E. Other items that would benefit the DTWP System

- 7.1.5 The report will be approved by the WACCC Chairperson and transmitted to the cognizant site, Lead Auditors, and other sites that are active in similar activities.

8.0 WACCC DOCUMENT CONTROL

8.1 WACCC Activities and WAC Document Tracking System

- 8.1.1 All WACCC activities and WAC documents shall be tracked on a formal computerized list by the WACCC Administrative Assistant.
- 8.1.2 The WACCC Chairperson, or his designee, is responsible for updating the tracking lists weekly. The list will be distributed on a monthly basis.
- 8.1.3 The tracking lists distribution shall include, but is not limited to, the following:
- A. WACCC Chairperson
 - B. Project Manager DOE/WPO
 - C. Assistant Manager of System Integration
 - D. Quality and Regulatory Assurance Branch Chief
 - E. WIPP MOC General Manager
 - F. WIPP Scientific Advisor
 - G. WTG Manager
 - H. WTG Members
 - I. WACCC Lead Auditors
 - J. All Cognizant DOE Headquarters, Field and Area Offices
 - K. All Cognizant DOE Contractors
 - L. NM EID
 - M. EEG
 - N. All Cognizant Host States

8.2 Formal Approval Letter

- 8.2.1 A Formal Approval Letter is prepared for generator/storage site waste packaging, transportation, QA, RCRA, and PA certification plans. The WACCC Chairperson approves and formally transmits the letter to the waste generator/storage site via the cognizant DOE Field/Area Office.

8.3 Document Transmittal to NM EID and EEG

- 8.3.1 The WACCC Chairperson transmits, after review by DOE/AL OCC, through the Repository Technology Branch (RTB), a copy of the conditionally approved plans to the EEG, and to the NM EID through the Environment, Safety and Health Branch (ESHB). The accompanying cover letter specifies a maximum review time of 30 days.
- 8.3.2 The WTG reviews the NM EID and EEG comments on generator/storage sites compliance plans. A letter for approval by the WACCC Chairperson is prepared that transmits applicable comments to the waste generator/storage site via the cognizant DOE Field/Area Office. The WACCC Chairperson, through the Repository Technology Branch, will act as liaison between the EEG and generator/storage sites, and through the Environment, Safety and Health Branch will act as liaison between the NM EID and generator/storage sites. The WTG, with the approval of the WACCC Chairperson, will assist the generator/storage site in resolving comments from the NM EID and EEG.

8.3.3 A response addressing all the NM EID or EEG comments is transmitted from the WACCC Chairperson, through the RTB, to the EEG, and through the ESHB to the NM EID, after review by the DOE/AL OCC.

8.3.4 The generator/storage site incorporates comments required and resubmits the plans to the WACCC Chairperson via the cognizant DOE Field/Area Office.

9.0 WAC IWG

9.1 The WAC IWG shall be convened when there are revisions to be made to the WAC, Transportation Criteria, RCRA Criteria and Performance Assessment Criteria.

9.2 The WAC IWG shall discuss what impacts the revisions will have at the respective sites and discuss solutions to problems that could possibly result from the revisions.

9.3 The WTG Manager shall recommend to the WACCC Chairperson when and under what circumstances to convene the WAC IWG.

9.4 The WAC IWG shall be composed of personnel from the WTG, DOE, and generator/storage sites. A chairperson shall be selected, a charter and a mission shall be developed for the group.

10.0 CRITERIA ASSESSMENT

10.1 The WTG shall review all WAC and propose to the WACCC Chairperson applicable revisions. The WACCC Chairperson will transmit proposed revisions to DOE/HQ-EM for consideration and approval.

- 10.2 The WTG shall review transportation requirements, assess impacts to current site compliance plans, through the WAC IWG, and propose revisions to the criteria.
- 10.3 The WTG shall propose incorporation into the WAC, RCRA requirements that affect the waste acceptance criteria. Changes to the criteria shall be proposed for DOE/HQ-EM approval as necessary.
- 10.4 The WTG shall propose incorporation into the WAC, PA requirements that affect the waste acceptance criteria. Changes to the criteria shall be proposed for DOE/HQ-EM approval as necessary.
- 10.5 Prior to any changes to the WAC, affected site Operations or Area Office Managers, and DOE/WPO will be consulted before approval by DOE/HQ-EM.

11.0 DEFINITIONS

Certification Plan - A generator/storage site controlling plan which includes waste packaging, transportation (use, including authorized contents, and minor maintenance), WAC related RCRA compliance, PA compliance, and QA plans.

Controlling Plan - A plan which describes the implementation of requirements from documents that contain criteria, e.g., certification plans.

Environmental Evaluation Group (EEG) - An organization established to provide oversight of the safety aspects of the WIPP Project.

New Mexico Environmental Improvement Division (NM EID) - A regulatory group within the State of New Mexico with authority over environmental aspects of WIPP, including RCRA (when authorized for such), and the DOE/New Mexico Consultation and Cooperation Agreements.

Performance Assessment - An evaluation of WIPP performance using mathematical models and codes to determine whether the facility meets EPA standards and requirements in Title 40, Code of Federal Regulations, Part 191.

Storage Site - A DOE facility that stores, or has stored, defense related TRU waste that may be disposed of at WIPP.

TRU Waste Certification Plan - The baseline controlling document, prepared by the waste generating or storage site, that describes the site certification program and how that program meets the requirements of the WAC and the WAC companion documents. Certification Plans must be approved by the WACCC.

TRU Waste Quality Assurance Plan - A baseline controlling document, prepared by the waste generating or storage site, that describes a QA program for generation, treatment and certification of TRU waste and how that program meets the requirements of WIPP/DOE-120 and DOE/WIPP 89-012. TRU Waste Quality Assurance Plans must be approved by the WACCC.

TRUPACT-II - An NRC certified Type B packaging used for the transportation of transuranic contact handled wastes.

TRUPACT-II Authorized Methods for Payload Control (TRAMPAC) - The document which provides payload compliance details as allowed by the NRC issued Certificate of Compliance (C of C) for TRUPACT-II.

TRUPACT-II Safety Analysis Report for Packaging - The safety analysis report for the TRUPACT-II.

Waste Acceptance Criteria (WAC) - The criteria used to certify compliance of waste being shipped to the Waste Isolation Pilot Plant (WIPP), as described in WIPP/DOE-069.

Waste Acceptance Criteria Certification Committee (WACCC) - The program established to certify compliance by waste generator/storage sites that waste to be shipped to WIPP complies with the WAC, transportation (use, including authorized contents, and minor maintenance) requirements, RCRA requirements, and PA requirements.

WACCC Chairperson - The designated Department of Energy (DOE) official responsible for overseeing and managing the functions of the WACCC.

Waste Acceptance Criteria Interface Working Group (WAC IWG) - A working group established with members from the generator/storage sites, DOE, and WIPP to be convened when changes or revisions are required to the Waste Acceptance Criteria (e.g., regulatory changes, transportation, waste acceptance). This group will discuss impacts of revised criteria to their respective sites.

Waste Generator - A DOE facility that generates defense-related TRU waste that may be disposed of at WIPP.

12.0 REGULATORY AND GUIDANCE DOCUMENTS

DOE 5820.2A, "Radioactive Waste Management," September 1988

WIPP/DOE-069, Rev. 3, "TRU Waste Acceptance Criteria for the Waste Isolation Pilot Plant," January 1989

DOE Management Directive 4.6.1, Rev 0, "Quality Assurance Audit Program," May 1989

WIPP/DOE-114, Rev 2, "TRU Waste Certification Compliance Requirements for Acceptance of Newly Generated Contact-Handled Wastes to be Shipped to the Waste Isolation Pilot Plant," January 1989

WIPP/DOE-120, Rev 2, "Quality Assurance Requirements for Certification of the TRU Waste for Shipment to the Waste Isolation Pilot Plant," August 1988

WIPP/DOE-137, Rev 2, "TRU Waste Certification Compliance for Acceptance of Contact-Handled Wastes Retrieved from Storage to be Shipped to the Waste Isolation Pilot Plant," January 1989

WIPP/DOE-157, Rev 2, "Data Package Format for Certified Transuranic Waste for the Waste Isolation Pilot Plant," January 1989

WIPP/DOE-158, Rev 1, "TRU Waste Certification Compliance Requirements for Remote-Handled Wastes for Shipment to the Waste Isolation Pilot Plant," January 1989

Letter to Secretary of Energy, James Watkins, from the Advisory Committee on Nuclear Facility Safety (Ahearne Committee), dated December 11, 1989

EEG Recommendations for the Revised Management Plan For the Waste Acceptance Criteria Certification Committee (WACCC), January 18, 1990

Blue Ribbon Panel Report, October 1989

DOE/WIPP 89-012, "Quality Assurance (QA) Plan For The Transportation and Receipt of Transuranic (TRU) Waste," February 1990.

ASME NQA-1 "Quality Assurance Program Requirements for Nuclear Facilities," 1989 Edition.