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**RENEWAL APPLICATION
APPENDIX B7**

PERMITTEE LEVEL TRU WASTE CONFIRMATION PROCESSES

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5	B7 1 _____ Overview of Waste Confirmation

1 Waste confirmation shall be completed by:

- 2 • Performing confirmation radiography or confirmation VE on the waste container(s);
3 and/or
- 4 • Performing confirmation radiography or confirmation VE by a review of certified
5 characterization program radiography or VE records; and
- 6 • Reviewing Waste Stream Profile Forms for each waste stream in each shipment to verify
7 that the waste contains no ignitable (D001), corrosive (D002), or reactive (D003) waste
8 and that assigned EPA HWNs are allowed for storage and disposal at the WIPP.

9 B7-1a Permittees' Confirmation of a Representative Subpopulation of the Waste

10 The Permittees shall randomly select at least seven percent of each waste stream per shipment
11 for waste confirmation. This equates to a minimum of one container from each 14 containers in
12 each waste stream in each designated shipment. If there are less than 14 containers from a waste
13 stream in a particular shipment, a minimum of one container from the waste stream shipped will
14 be selected. If the random selection of containers in a shipment occurs prior to loading the waste
15 containers into the Shipping Package, the randomly selected containers may be consolidated into
16 a single Type B package consistent with transportation requirements. Documentation of the
17 random selection of containers for waste confirmation will be placed in the WIPP facility
18 operating record.

19 ~~The Permittees shall confirm that the waste contains no ignitable, corrosive, or reactive waste~~
20 ~~through radiography (Section B7-1b) or the use of visual examination (Section B7-1c) of a~~
21 ~~statistically representative subpopulation of the waste. Prior to shipment to WIPP, waste~~
22 ~~confirmation will be performed on randomly selected containers from each CH and RH TRU~~
23 ~~mixed waste stream shipment. Figure B7-1 presents the overall waste verification and~~
24 ~~confirmation process.~~

25 ~~The Permittees' waste confirmation encompasses ensuring that the physical characteristics of the~~
26 ~~TRU mixed waste correspond with its waste stream description and that the waste does not~~
27 ~~contain liquids in excess of TSDLF-WAC limits or compressed gases. These techniques can~~
28 ~~detect liquids that exceed 1 percent volume of the container and containerized gases, which are~~
29 ~~prohibited from storage or disposal at the WIPP facility. The prohibition of liquids and~~
30 ~~containerized gases prevents the storage or disposal of ignitable, corrosive, or reactive wastes.~~
31 ~~Radiography, and/or visual examination will ensure that the physical form of the waste matches~~
32 ~~its waste stream description (i.e., Homogeneous Solids, Soil/Gravel, or Debris Waste). The~~
33 ~~results of the Permittees' waste confirmation activities, including radiography, and visual~~
34 ~~examination records (data sheets, packaging logs, and/or video and audio recordings) will be~~
35 ~~maintained in the WIPP facility operating record. Noncompliant waste identified during waste~~
36 ~~confirmation will be managed as described in Section B7-2.~~

37 ~~The Permittees shall randomly select at least 7 percent of each waste stream shipment for waste~~
38 ~~confirmation. This equates to a minimum of one container from each fourteen containers in each~~

1 ~~waste stream in each designated shipment. If there are less than fourteen containers from a waste~~
2 ~~stream in a particular shipment, a minimum of one container from the waste stream shipped will~~
3 ~~be selected. If the random selection of containers in a shipment occurs prior to loading the waste~~
4 ~~containers into the Shipping Package, the randomly selected containers may be consolidated into~~
5 ~~a single Type B package consistent with transportation requirements. Documentation of the~~
6 ~~random selection of containers for waste confirmation will be placed in the WIPP facility~~
7 ~~operating record.~~

8 B7-1a(1) Confirmation Training Requirements

9 ~~Waste confirmation may be completed by performing actual radiography/visual examination on~~
10 ~~the waste container(s) or by a review of radiography/visual examination media and records.~~

11 Waste confirmation personnel may be trained to perform confirmation radiography or
12 confirmation VE by either a review of radiography or VE ~~visual examination~~ media and records
13 (Level 1 training) or ~~to~~ by performing actual confirmation radiography or confirmation VE
14 ~~visual examination~~ on the waste container(s) (Level 2 training). Additionally, Level 2 trained
15 personnel may also perform waste confirmation by review of media and records.

16 ~~The Permittees management representative must be trained to the requirements of Level 2.~~

17 The personnel performing waste confirmation shall be trained in accordance with the
18 requirements of Renewal Application Appendix H1 (RCRA Hazardous Waste Management Job
19 Titles and Descriptions).

20 B7-1b Confirmation Radiography Methods Requirements

21 Confirmation ~~R~~adiography has been developed by the Permittees specifically to aid in the
22 examination and identification of containerized waste. Confirmation radiography may be used to
23 confirm that the waste contains no ignitable, corrosive, or reactive waste. This is achieved by
24 confirming that the waste contains no liquids in excess of Treatment Storage and Disposal
25 Facility – Waste Acceptance Criteria (TSDF-WAC) limits or compressed gases. The Permittees
26 shall describe all activities required to achieve the confirmation radiography objectives in
27 standard operating procedures (SOPs). These SOPs shall include instructions specific to the
28 radiography system(s) used by the Permittees at an off-site facility (e.g., the generator/storage
29 site transuranic (TRU) waste site). For example, to detect liquids, some systems require the
30 container to be rotated back and forth while other systems require the container to be tilted.

31 A radiography system (e.g., real time radiography, digital radiography/computed tomography)
32 normally consists of an X-ray producing device, an imaging system, an enclosure for radiation
33 protection, a waste container handling system, a video and audio recording system, and an
34 operator control and data acquisition station. Although these six components are required, it is
35 expected there will be some variation within a given component between radiography systems.
36 The radiography system shall have controls or an equivalent process which allow the operator to
37 control image quality. On some radiography systems, it should be possible to vary the voltage,
38 typically between 150 to 400 kilovolts (kV), to provide an optimum degree of penetration

1 through the waste. For example, high density material should be examined with the X-ray
2 device set on the maximum voltage. This ensures maximum penetration through the waste
3 container. Low density material should be examined at lower voltage settings to improve
4 contrast and image definition. The imaging system typically utilizes either a fluorescent screen
5 and a low light television camera or x-ray detectors to generate the image.

6 To perform confirmation radiography, the waste container is scanned while the operator views
7 the monitor television screen. An video and audio and video recording is made of the waste
8 container scan and is maintained in the WIPP facility operating record as a non-permanent
9 record. For containers that have been characterized using radiography by the certified
10 characterization programs in accordance with the method in Renewal Application Appendix B1
11 (Waste Characterization Sampling Methods), Section B1-3, the Permittees may perform
12 confirmation by review of the certified characterization program's radiography audio and video
13 recordings. A radiography data confirmation form is also used to document the Waste Matrix
14 Code, ensure that the results of the confirmation radiography the waste container contains no
15 ignitable, corrosive, or reactive waste by documenting the absence of liquids in excess of TSDF-
16 WAC limits or compressed gases, and verify that the physical form of the waste is consistent
17 with the waste stream description documented on the WSPP. Containers whose contents prevent
18 full examination of the remaining contents shall be subject to visual examination unless the
19 Permittees certify that visual examination would provide no additional relevant information for
20 that container based on the acceptable knowledge information for the waste stream. Such
21 certification shall be documented in the WIPP facility operating record.

22 For containers that have been characterized using radiography by the generator/storage sites in
23 accordance with the method in Renewal Application Appendix B1, Section B1-3, the Permittees
24 may perform confirmation by review of the generator/storage site's radiography audio/video
25 recordings.

26 For containers which contain classified shapes and undergo radiography, the confirmation
27 radiography will occur at a facility with appropriate security provisions and the video and audio
28 and video recording will be considered classified. Classified information will not be recorded on
29 confirmation forms. The radiography data forms will not be considered classified.

30 B7-1b(1) Radiography Training

31 The radiography system involves qualitative and semiquantitative evaluations of visual displays.
32 Operator training and experience are the most important considerations for ensuring quality
33 controls in regard to the operation of the radiography system and for interpretation and
34 disposition of radiography results. Only trained personnel shall be allowed to operate
35 radiography equipment.

36 The Permittee radiography operators performing waste confirmation shall be trained in
37 accordance with the requirements of Renewal Application Appendix H1.

1 B7-1b(12) Confirmation Radiography Oversight Quality Control

2 The Permittees shall be responsible for monitoring the quality of the confirmation radiography
3 data and calling for corrective action, when necessary.

4 ~~A training drum with internal containers of various sizes shall be scanned biennially by each
5 Level 2 operator. The video and audio media shall then be reviewed by a radiography subject
6 matter expert to ensure that operators' interpretations remain consistent and accurate. Imaging
7 system characteristics shall be verified on a routine basis.~~

8 Independent replicate scans and replicate observations of the video output of the confirmation
9 radiography process shall be performed under uniform conditions and procedures. An
10 ~~I~~ independent replicate scans (when performing confirmation radiography) shall be performed on
11 one waste container per day or once per shipment, whichever is less frequent, ~~, or an~~ independent
12 observations of one scan (~~not the replicate scan~~) shall also be made once per day or once per
13 shipment, whichever is less frequent, by a qualified confirmation radiography operator other than
14 the individual who performed the first examination. The independent replicate scan or
15 observation will be documented by signature on the confirmation form. ~~When confirmation is~~
16 ~~performed by review of audio/video recorded scans produced by the generator/storage site as~~
17 ~~specified in Renewal Application Appendix B1, Section B1-3, independent observations shall be~~
18 ~~performed on two waste containers per shipment or two containers per day, whichever is less~~
19 ~~frequent.~~

20 B7-1c Confirmation Visual Examination Methods Requirements

21 Visual examination (VE) may also be used as a waste confirmation method by the Permittees.
22 The Permittees shall describe all activities required to achieve the confirmation VE objectives in
23 SOPs. VE shall be conducted by the Permittees in accordance with written SOPs to describe the
24 contents of a waste container. The description shall clearly identify all discernible waste items,
25 residual materials, packaging materials, or waste material parameters. Confirmation VE may be
26 used by the Permittees to examine a statistically representative subpopulation of the waste
27 certified for shipment to WIPP to confirm that the waste contains no ignitable, corrosive, or
28 reactive waste. This is achieved by confirming that the waste contains no residual liquids in
29 excess of TSDF-WAC limits or compressed gases, ~~and that the physical form of the waste~~
30 ~~matches the waste stream description documented on the WSPF.~~ The confirmation VE shall be
31 performed and recorded on audio and video media or performed by reviewing VE records
32 obtained from the certified characterization program during their VE of the waste. A VE data
33 confirmation form is used to document the result of the confirmation VE. ~~this information.~~
34 During packaging, the waste container contents are directly examined by trained personnel. ~~This~~
35 ~~form of waste confirmation may be performed by the Permittees at a generator/storage site. The~~
36 ~~VE may be recorded on video and audio media, or alternatively, by using a second operator to~~
37 ~~provide additional verification by reviewing the contents of the waste container to ensure correct~~
38 ~~reporting.~~

39 In order to keep radiation doses as low as reasonably achievable at generator/storage sites, the
40 Permittees may use their own trained VE operators to perform VE for waste confirmation by

1 ~~reviewing video media prepared by the generator/storage site during their VE of the waste. If the~~
2 ~~Permittees perform waste confirmation by review of video media, the video record of the VE~~
3 ~~must be sufficiently complete for the Permittees to confirm the Waste Matrix Code and waste~~
4 ~~stream description, and verify the waste contains no residual liquids in excess of TSDF WAC~~
5 ~~limits or compressed gases. Generator/storage site VE video/audio media subject to review by~~
6 ~~the Permittees shall meet the following minimum requirements:~~

- 7 ~~• The video/audio media shall record the waste packaging event for the container such that~~
8 ~~all waste items placed into the container are recorded in sufficient detail that a trained~~
9 ~~Permittee VE expert can determine what the waste items are and their associated waste~~
10 ~~material parameter.~~
- 11 ~~• The video/audio media shall capture the waste container identification number.~~
- 12 ~~• The personnel loading the waste container shall be identified on the video/audio media or~~
13 ~~on packaging records traceable to the loading of the waste container.~~
- 14 ~~• The date of loading of the waste container will be recorded on the video/audio media or~~
15 ~~on packaging records traceable to the loading of the waste container.~~

16 ~~The Permittees may also use their own trained VE operators to perform VE for waste~~
17 ~~confirmation by reviewing VE data forms or packaging logs prepared by the generator during~~
18 ~~their packaging of the waste. To be acceptable, the generator/storage site VE data must be~~
19 ~~signed by two generator/storage site personnel who witnessed the packaging of the waste and~~
20 ~~must provide sufficient information for the Permittees to determine that the waste container~~
21 ~~contents match the waste stream description on the WSPF and the waste contains no liquids in~~
22 ~~excess of TSDF WAC limits or compressed gases. The Permittees will document their review of~~
23 ~~generator/storage site VE data on Permittee VE data forms. Generator/storage site VE forms or~~
24 ~~packaging logs subject to review by the Permittees shall meet the following minimum~~
25 ~~requirements:~~

- 26 ~~• At least two generator site personnel shall approve the data forms or packaging logs~~
27 ~~attesting to the contents of the waste container.~~
- 28 ~~• The data forms or packaging logs shall contain an inventory of waste items in sufficient~~
29 ~~detail that a trained Permittee VE expert can identify the associated waste material~~
30 ~~parameters.~~
- 31 ~~• The waste container identification number shall be recorded on the data forms or~~
32 ~~packaging logs.~~

33 The VE video media of containers which contain classified shapes shall be considered classified
34 information. Classified information will not be recorded on confirmation forms. VE data forms
35 will not be considered classified information.

1 B7-1c(1) Visual Examination Training

2 ~~The Permittees' VE operators performing waste confirmation shall be trained in accordance with~~
3 ~~the requirements of Renewal Application Appendix H1.~~

4 B7-1c(1) Confirmation Visual Examination Oversight Quality Control

5 The Permittees shall be responsible for monitoring the quality of the confirmation VE data and
6 calling for corrective action, when necessary.

7 Confirmation VE data are assured by using standardized confirmation VE procedures and
8 operator training.

9 ~~The Permittees shall designate at least one VE expert. The VE expert shall be familiar with the~~
10 ~~processes that were used to generate the waste streams being confirmed using VE. The VE~~
11 ~~expert shall be responsible for the overall direction and implementation of the Permittees' VE~~
12 ~~program. The Permittees shall specify the selection, qualification, and training requirements of~~
13 ~~the visual examination expert in an SOP.~~

14 B7-1d Quality Assurance Objectives (QAOs) for Confirmation Radiography and Confirmation
15 Visual Examination

16 The Quality Assurance Objectives (QAOs) the Permittees must meet for confirmation
17 radiography and ~~visual examination~~ confirmation VE are detailed in this section. If the QAOs
18 described below are not met, then corrective action as specified in Renewal Application
19 Appendix B3, (Quality Assurance Objectives and Data Validation Techniques for Waste
20 Characterization Sampling and Analytical Methods), Section B3-13 shall be taken.

21 B7-1d(1) Confirmation Radiography Quality Assurance Objectives QAOs

22 The QAOs for confirmation radiography are detailed in this section. If the QAOs described
23 below are not met, then corrective action shall be taken.

24 Data to meet these objectives must be obtained from an ~~an video and audio~~ audio and video
25 recorded scan provided by trained confirmation radiography operators or certified
26 characterization programs. Results must also be recorded on a confirmation radiography data
27 form. The precision, accuracy, representativeness, completeness, and comparability objectives
28 for confirmation radiography data are presented below.

29 Precision

30 Precision is maintained by reconciling any discrepancies between two confirmation radiography
31 operators with regard to ~~the waste stream waste confirmation~~, identification of liquids in excess
32 of TSDF-WAC limits; and identification of compressed gases through independent replicate
33 scans ~~and~~ or independent observations.

1 Accuracy

2 Accuracy is obtained by ~~using a target to tune the image for maximum sharpness and by~~
3 requiring confirmation operators to successfully identify 100 percent of the required items in a
4 training container during their initial qualification and subsequent requalification.

5 Representativeness

6 Representativeness is ensured by performing confirmation radiography on a random sample of
7 waste containers from each waste stream in each shipment.

8 Completeness

9 ~~A video and audio media recording of the radiography examination and a validated radiography~~
10 ~~data~~ The results of confirmation radiography will be documented on a confirmation form ~~will be~~
11 ~~obtained~~ for 100 percent of the waste containers subject to confirmation radiography.

12 Comparability

13 The comparability of confirmation radiography data from different operators shall be enhanced
14 by using standardized confirmation radiography procedures and operator training qualifications.

15 B7-1d(2) Confirmation Visual Examination Quality Assurance Objectives ~~QAOs~~

16 Results must be recorded on a ~~VE data~~ confirmation form. The precision, accuracy,
17 representativeness, completeness, and comparability objectives for VE data are presented below.

18 Precision

19 Precision is maintained by reconciling any discrepancies between the operator and the
20 independent technical reviewer with regard to ~~the waste stream waste confirmation,~~
21 identification of liquids in excess of TSDf-WAC limits; and identification of compressed gases.

22 Accuracy

23 Accuracy is maintained by requiring operators to pass a comprehensive examination and
24 demonstrate satisfactory performance ~~in the presence of the VE expert~~ during their initial
25 qualification and subsequent requalification.

26 Representativeness

27 Representativeness is ensured by performing confirmation VE on a random sample of waste
28 containers ~~within each waste stream in each shipment.~~

1 Completeness

2 A validated VE data confirmation form will be obtained for 100 percent of the waste containers
3 subject to confirmation VE.

4 Comparability

5 The comparability of confirmation VE data from different operators shall be enhanced by using
6 standardized confirmation VE procedures and operator training qualifications.

7 B7-1e Confirmation Waste Stream Profile Form Review

8 The Permittees shall review the WSPF associated with each selected waste container to ensure
9 that the waste contains no ignitable, corrosive, or reactive waste and that the assigned EPA
10 HWNs are allowed for storage and disposal at the WIPP. This review is documented on the
11 confirmation form.

12 B7-1e Review and Validation for Confirmation of Radiography and Visual Examination Data
13 Used for Waste Examination

14 This section describes the requirements for review and validation for confirmation of
15 radiography and VE data by the Permittees.

16 B7-1e(1) Independent Technical Review

17 The confirmation radiography and/or VE confirmation data for each shipment shall receive an
18 independent technical review. This review will be performed before the affected waste shipment
19 is shipped to received at the WIPP facility. The review shall be performed by an individual other
20 than the data generator who is qualified to have performed the work. The review will be
21 performed in accordance with approved Permittee SOPs and will be documented on a review
22 checklist. The reviewer(s) must approve the data as evidenced by signature, and as a
23 consequence, ensure the following:

- 24 • ~~Data generation and reduction were conducted in a technically correct manner in~~
25 ~~accordance with the methods used (procedure with revision). Data were reported in the~~
26 ~~proper units and correct number of significant figures.~~
- 27 • The data have been reviewed for transcription errors.
- 28 • Radiography video and audio audio and video media recordings for the selected
29 container(s) have been reviewed to ensure audio and video provide acceptable playback
30 (independent observation) on a waste container basis at a minimum of once per shipment
31 or once per day of operation, whichever is less frequent. The radiography video/audio
32 recording will be reviewed against the data reported on the Permittees' radiography form
33 to ensure that the data are correct and complete. If review of radiography scans recorded

1 ~~by the generator/storage site was used to perform confirmation, two observations must be~~
2 ~~performed for each shipment or two observations per day, whichever is less frequent.~~

- 3 ~~• The Quality Control checks have been performed (e.g., replicate scans).~~
- 4 ~~• The data meet the established QAOs.~~
- 5 ~~• The confirmation form indicates that the waste container data for the selected container~~
6 ~~have been reviewed to ensure that the waste contains no ignitable, corrosive, or reactive~~
7 ~~waste.~~
- 8 ~~• The confirmation form indicates that the WSPF has been reviewed to ensure the waste~~
9 ~~contains no ignitable, corrosive, or reactive waste and that the assigned EPA HWNs are~~
10 ~~allowed for storage and disposal at the WIPP.~~

11 ~~Upon completion of the independent technical review, the waste confirmation data for the~~
12 ~~shipment shall be submitted to the WIPP facility operating record as non-permanent records.~~
13 ~~Waste confirmation data includes radiography and VE confirmation forms, audio and video~~
14 ~~media, and review checklists.~~

15 ~~B7 1e(2) Permittee Management Review~~

16 ~~The radiography and/or visual examination data for each shipment shall receive a Permittee~~
17 ~~management review. This review will be performed before the affected waste shipment is~~
18 ~~disposed of at the WIPP facility. The review shall be performed by a designated member of~~
19 ~~Permittee management. The review will be performed in accordance with approved Permittee~~
20 ~~SOPs and will be documented on a review checklist. The reviewer(s) must approve the data as~~
21 ~~evidenced by signature, and as a consequence, ensure the following:~~

- 22 ~~• The data are technically reasonable based on the technique used.~~
- 23 ~~• The data have received independent technical review.~~
- 24 ~~• The data indicate that the waste examined contained no ignitable, corrosive, or reactive~~
25 ~~waste and that the physical form of the waste was consistent with the waste stream~~
26 ~~description in the WSPF.~~
- 27 ~~• The data indicate that the Hazardous Waste Numbers are consistent with the approved~~
28 ~~WSPF.~~
- 29 ~~• QC checks have been performed (e.g., replicate scans, image quality checks).~~
- 30 ~~• The data meet the established QAOs.~~

31 ~~Upon completion of the Permittee management review, the waste confirmation data for the~~
32 ~~shipment shall be submitted to the WIPP facility operating record as non-permanent records.~~

1 ~~Waste confirmation data includes radiography and VE data forms, video/audio media, and~~
2 ~~review checklists.~~

3 B7-2 Noncompliant Waste Identified During Waste Confirmation

4 If the Permittees identify noncompliant waste during waste confirmation at a TRU waste
5 generator/storage site, (i.e., the waste does not match the waste stream description documented in
6 the WSPF or there are liquids in excess of TSDF WAC limits or compressed gases) the waste
7 will not be received at WIPP shipped. The Permittees will suspend further shipments of the
8 affected waste stream and issue a Corrective Action Report (CAR) to the generator/storage site
9 certified characterization program. Shipments of affected waste streams shall not resume until
10 the CAR has been closed. The New Mexico Environment Department (NMED) will be notified
11 within 24 hours of any suspension of waste stream shipments due to the identification of
12 noncompliant waste during waste confirmation.

13 As part of the corrective action plan in response to the CAR, the generator/storage site certified
14 characterization program will evaluate whether the waste characterization information
15 documented in the Characterization Information Summary and/or WSPF for the waste stream
16 must be updated, ~~because the results of waste confirmation for the waste stream indicated that~~
17 ~~the TRU mixed waste being examined did not match the waste stream description.~~ The
18 ~~generator/storage site will thoroughly evaluate the potential impacts on waste that has been~~
19 ~~shipped to WIPP. The Permittees will evaluate the potential that prohibited items were shipped~~
20 ~~to WIPP and what remedial actions should occur, if any. The results of these evaluations will be~~
21 ~~provided to NMED before shipments of affected waste streams resume.~~ If the Characterization
22 Information Summary and/or WSPF requires revision, shipments of the affected waste stream
23 shall not resume until the revised ~~waste stream~~ waste characterization information has been
24 reviewed and approved by the Permittees.

25 If a generator/storage site certified characterization program certifies noncompliant waste from a
26 TRU waste site more than once during a running 90-day period, the Permittees will suspend
27 acceptance of that site's TRU waste site's waste until the Permittees find that all corrective
28 actions have been implemented and the site certified characterization program complies with all
29 applicable requirements of the Waste Analysis Plan (WAP).

1

References

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Section 310 of Pub. L. 108-447, December 8, 2004, 118 stat 2809

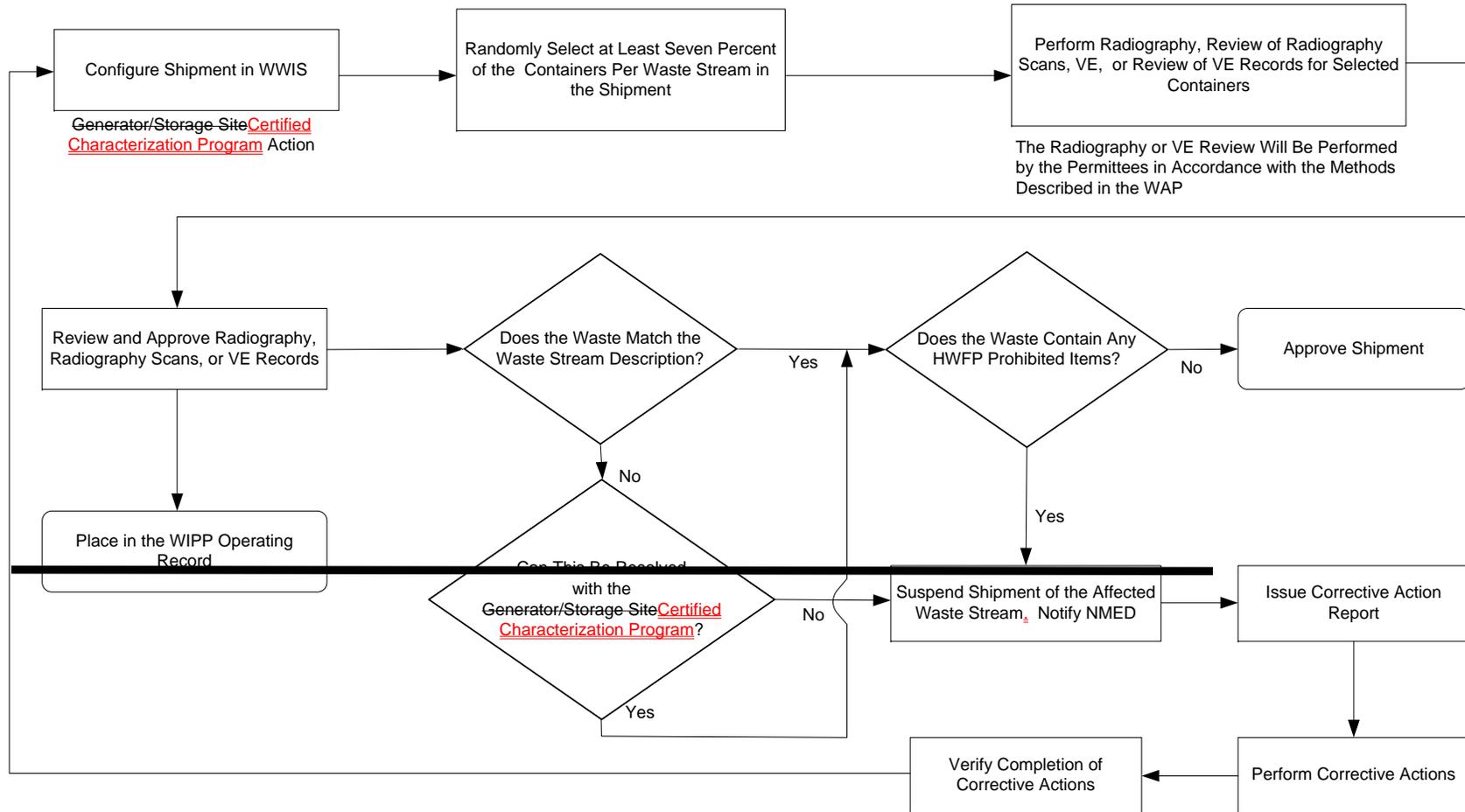
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FIGURES

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Figure B7-1
 Overview of Waste Confirmation