

U. S. Department of Energy
Carlsbad Field Office

MANAGEMENT PROCEDURE

CBFO MP 3.4, Rev. 0

Effective: November 16, 2006

Expires: November 16, 2008

**SUBJECT: CBFO MANAGER ACTIONS UPON NOTIFICATION OF POTENTIAL
NONCOMPLIANT WASTE IDENTIFIED DURING THE WASTE CONFIRMATION PROCESS**

 Manager, Carlsbad Field Office: Signature on File

Date: 11/13/06

1.0 PURPOSE

This procedure defines the process for reviewing, evaluating, determining, and implementing the actions required by the Carlsbad Field Office (CBFO) upon notification that potential noncompliant waste was identified during the waste confirmation process.

2.0 SCOPE

This procedure applies to U. S. Department of Energy (DOE) personnel who provide independent review and technical recommendations concerning compliance with requirements of the Waste Isolation Pilot Plant Hazardous Waste Facility Permit (HWFP) Waste Analysis Plan (WAP).

3.0 REFERENCES AND DEFINITIONS**3.1 References**

- Waste Isolation Pilot Plant (WIPP) Hazardous Waste Facility Permit
- CBFO Management Procedure (MP) 3.1, *Corrective Action Reports*

3.2 Definitions

- **Waste confirmation** - Waste confirmation is defined as the activities performed by the Permittees to satisfy the requirements specified in the HWFP, Attachment B7. Waste confirmation occurs after waste containers have been certified for disposal at the Waste Isolation Pilot Plant (WIPP).
- **Noncompliant waste** - Waste that, as determined during the confirmation process, does not match the waste stream description documented in the Waste Stream Profile Form (WSPF) or there are liquids in excess of TSDF-WAC limits or compressed gases.

4.0 RESPONSIBILITIES**4.1 CBFO Manager**

- 4.1.1 Assemble a team to review, evaluate, and determine the actions to be taken by CBFO when notified that potential noncompliant waste was identified during the waste confirmation process.

AVAILABLE ONLINE AT:
<http://bellview/cbfo/procedures/ProcedureManualTOC/htm>

INITIATED BY:
 Senior Technical Advisor

- 4.1.2 Implement or ensure the implementation of the actions required by the WAP, based upon the input of the assembled review team.
- 4.1.3 Assign personnel to perform actions required by the WAP when potential noncompliant waste is verified by the Manager's review team.

5.0 PROCEDURE

- 5.1 Review, Planning, Evaluation, Determination, and Implementation
 - 5.1.1 Upon notification that potential noncompliant waste was identified during the waste confirmation process, the CBFO Manager will establish a team to review, evaluate, and recommends the necessary actions that CBFO should take.
 - 5.1.2 The team should include personnel who have adequate experience involving the HWFP WAP requirements.
 - 5.1.3 The team reviews and evaluates the confirmation data and establishes if the potential noncompliance can be resolved with the generator site, or if the following conditions exist:
 - The waste does not match the waste stream description.
 - Liquids in excess of TSDF-WAC limits or compressed gases exist.
 - 5.1.4 The team reports the results of reviews and evaluations along with recommendations for the actions that CBFO should implement to the CBFO Manager.
- 5.2 CBFO implementation of required actions
 - 5.2.1 Based upon the input from the review team, the CBFO Manager determines the actions that CBFO will implement.
 - 5.2.2 The CBFO Manager or designee resolves the potential noncompliance with the generator site, if possible, and determines if the waste matches the waste stream description and contains no liquids in excess of TSDF-WAC limits or compressed gases. The CBFO Manager or designee approves the shipment upon satisfactory resolution of the potential noncompliance.
 - 5.2.3 If resolution of the potential noncompliance could not be achieved or was not satisfactory, the CBFO Manager or designee performs the following:
 - Suspend shipments of the affected waste stream;
 - Issue a corrective action report (CAR) addressing the noncompliance;
 - Notify the New Mexico Environment Department (NMED) within 24 hours of suspension of shipments;
 - Ensure that the generator site evaluates whether the waste characterization information documented on the Characterization Information Summary and/or WSPF must be updated and that this evaluation is documented in the corrective action plan;

- Ensure that the generator site thoroughly evaluates the potential impacts on waste that has been shipped to WIPP and that this evaluation is documented in the corrective action plan;
- Evaluate the potential that liquids in excess of TSDf-WAC or compressed gases were shipped to WIPP and what remedial actions should occur, if any;
- Provide results of the evaluations to NMED before the shipments of affected waste can resume; and
- Suspend acceptance of waste from a generator site that certifies noncompliant waste more than once during a running 90-day period until the Permittees find that all corrective actions have been implemented and the site complies with all applicable requirements of the WAP.

6.0 RECORDS

No records are produced as a result of implementing this procedure.

7.0 ATTACHMENTS

None