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**RENEWAL APPLICATION
APPENDIX B7**

PERMITTEE LEVEL TRU WASTE CONFIRMATION PROCESSES

Waste Isolation Pilot Plant
Hazardous Waste Facility Permit
Draft Renewal Application
May 2009

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1 **RENEWAL APPLICATION**
2 **APPENDIX B7**

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4 **PERMITTEE LEVEL TRU WASTE CONFIRMATION PROCESSES**

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Figure	Title
B7-1	Overview of Waste Confirmation

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**RENEWAL APPLICATION
APPENDIX B7**

PERMITTEE LEVEL TRU WASTE CONFIRMATION PROCESSES

Introduction

This part of the ~~Waste Analysis Plan (WAP)~~ Renewal Application Appendix B7, Permittee Level TRU Waste Confirmation Processes, describes the actions that the Permittees will take to confirm waste prior to approve and accept receipt waste for storage and disposal at the Waste Isolation Pilot Plant (WIPP), ~~including waste confirmation activities.~~ Confirmation is not performed for waste streams that have an approved Scenario 1 or 2 Acceptable Knowledge Sufficiency Determination (AKSD).

The Permittees ~~demonstrate compliance with the Permit by ensuring that the waste characterization processes performed by generator/storage sites (sites) produce data compliant with the WAP and through the waste screening and verification processes. Verification occurs at three levels: 1) the data generation level, 2) the project level, and 3) the Permittee level. The Permittees also shall examine a representative subpopulation of waste prior to shipment receipt at WIPP to confirm that the waste contains no ignitable, corrosive or reactive waste; and that assigned Environmental Protection Agency (EPA) hazardous waste numbers (HWNs) are allowed by the Permit. The waste confirmation activities described herein occur prior to shipment receipt of the waste from the generator/storage site to at WIPP.~~

B7-1 Permittee Confirmation of ~~Transuranic~~ TRU Mixed Waste

Waste confirmation is ~~defined in Module I as the activities~~ activity performed by the Permittees to satisfy the requirements specified in Section 310 of Pub. L. 108-447. Waste confirmation occurs after waste containers have been certified for disposal at WIPP. As required by Section 310, confirmation shall be limited to “(1) confirmation that the waste contains no ignitable, corrosive, or reactive waste through the use of either radiography or visual examination of a statistically representative subpopulation of the waste; and (2) review of the Waste Stream Profile Form to verify that the waste contains no ignitable, corrosive, or reactive waste and that assigned Environmental Protection Agency hazardous waste numbers are allowed for storage and disposal by the WIPP Hazardous Waste Facility Permit.” ~~The general confirmation process for WIPP waste is presented in Figure B7-1.~~

Confirmation radiography (Section B7-1b) and visual examination (VE) (Section B7-1c) can detect liquid wastes and containerized gases, which are prohibited for WIPP disposal. The prohibition of liquids and containerized gases prevents the shipment of corrosive, ignitable, or reactive wastes.

Waste confirmation shall be completed by:

- 1 • performing confirmation radiography or VE on the waste container(s); and/or
- 2
- 3 • performing confirmation radiography or VE by a review of certified characterization
- 4 program radiography or VE records; and
- 5
- 6 • reviewing Waste Stream Profile Forms for each waste stream in each shipment to verify
- 7 that the waste contains no ignitables (D001), corrosives (D002), or reactives (D003) and
- 8 that assigned EPA Hazardous Waste Numbers are allowed for storage and disposal at the
- 9 WIPP.
- 10

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

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

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

27

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

40

41 ~~The Permittees shall randomly select at least 7 percent of each waste stream shipment for waste~~
42 ~~confirmation. This equates to a minimum of one container from each fourteen containers in each~~
43 ~~waste stream in each designated shipment. If there are less than fourteen containers from a waste~~
44 ~~stream in a particular shipment, a minimum of one container from the waste stream shipped will~~

1 be selected. If the random selection of containers in a shipment occurs prior to loading the waste
2 containers into the Shipping Package, the randomly selected containers may be consolidated into
3 a single Type B package consistent with transportation requirements. Documentation of the
4 random selection of containers for waste confirmation will be placed in the WIPP facility
5 operating record.

6 7 B7-1a(1) Confirmation Training Requirements

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

10
11 Waste confirmation personnel may be trained to perform confirmation radiography or VE by
12 either a review of radiography or VE /visual examination media and records (Level 1 training) or
13 ~~to by performing~~ actual confirmation radiography or VE /visual examination on the waste
14 container(s) (Level 2 training). Additionally, Level 2 trained personnel may also perform waste
15 confirmation by review of media and records.

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

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

22 23 B7-1b Radiography Methods Requirements

24 Radiography has been developed by the Permittees specifically to aid in the examination and
25 identification of containerized waste. The Permittees shall describe all activities required to
26 achieve the confirmation radiography objectives in standard operating procedures (SOPs).
27 These SOPs shall include instructions specific to the radiography system(s) used by the
28 Permittees at an off-site facility (e.g., the generator/storage site TRU waste site). [For example,
29 to detect liquids, some systems require the container to be rotated back and forth while other
30 systems require the container to be tilted.]

31
32 A radiography system (e.g., real-time radiography, digital radiography/computed tomography)
33 normally consists of an X-ray producing device, an imaging system, an enclosure for radiation
34 protection, a waste container handling system, a video and audio recording system, and an
35 operator control and data acquisition station. Although these six components are required, it is
36 expected there will be some variation within a given component between radiography systems.
37 The radiography system shall have controls or an equivalent process which allow the operator to
38 control image quality. On some radiography systems, it should be possible to vary the voltage,
39 typically between 150 to 400 kilovolts (kV), to provide an optimum degree of penetration
40 through the waste. For example, high density material should be examined with the X-ray
41 device set on the maximum voltage. This ensures maximum penetration through the waste
42 container. Low density material should be examined at lower voltage settings to improve
43 contrast and image definition. The imaging system typically utilizes either a fluorescent screen
44 and a low light television camera or x-ray detectors to generate the image.

1
2 To perform confirmation radiography, the waste container is scanned while the operator views
3 the monitor television screen. A ~~video~~ and audio and video recording is made of the waste
4 container scan and is maintained in the WIPP facility operating record as a non-permanent
5 record. For containers that have been characterized using radiography by the certified
6 characterization programs in accordance with the method in Renewal Application Appendix B1
7 (Waste Characterization Sampling Methods), Section B1-3, the Permittees may perform
8 confirmation by review of the certified characterization program's radiography audio and video
9 recordings. A radiography data confirmation form is also used to document the Waste Matrix
10 Code, ensure that the results of the confirmation radiography the waste container contains no
11 ignitable, corrosive, or reactive waste by documenting the absence of liquids in excess of TSDF-
12 WAC limits or compressed gases, and verify that the physical form of the waste is consistent
13 with the waste stream description documented on the WSPPF. Containers whose contents prevent
14 full examination of the remaining contents shall be subject to visual examination unless the
15 Permittees certify that visual examination would provide no additional relevant information for
16 that container based on the acceptable knowledge information for the waste stream. Such
17 certification shall be documented in the WIPP facility operating record.

18
19 ~~For containers that have been characterized using radiography by the generator/storage sites in~~
20 ~~accordance with the method in Renewal Application Appendix B1, Section B1-3, the Permittees~~
21 ~~may perform confirmation by review of the generator/storage site's radiography audio/video~~
22 ~~recordings.~~

23
24 For containers which contain classified shapes and undergo radiography, the confirmation
25 radiography will occur at a facility with appropriate security provisions and the ~~video~~ and audio
26 and video recording will be considered classified. Classified information will not be recorded on
27 confirmation forms. The radiography data forms will not be considered classified.

28 29 B7-1b(1) Radiography Training

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

35
36 The Permittee radiography operators performing waste confirmation shall be trained in
37 accordance with the requirements of Renewal Application Appendix H1.

38 39 B7-1b(12) Confirmation Radiography Oversight Quality Control

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

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

5
6 Independent replicate scans and replicate observations of the video output of the confirmation
7 radiography process shall be performed under uniform conditions and procedures. An
8 independent replicate scan (when performing confirmation radiography) shall be performed on
9 one waste container per day or once per shipment, whichever is less frequent, or an independent
10 observations of one scan ~~(not the replicate scan)~~ shall also be made once per day or once per
11 shipment, whichever is less frequent, by a qualified confirmation radiography operator other than
12 the individual who performed the first examination. The independent replicate scan or
13 observation will be documented by signature on the confirmation form. When confirmation is
14 performed by review of audio/video recorded scans produced by the generator/storage site as
15 specified in Renewal Application Appendix B1, Section B1-3, independent observations shall be
16 performed on two waste containers per shipment or two containers per day, whichever is less
17 frequent.

18
19 B7-1c Confirmation Visual Examination Methods Requirements

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

38
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
41 reviewing video media prepared by the generator/storage site during their VE of the waste. If the
42 Permittees perform waste confirmation by review of video media, the video record of the VE
43 must be sufficiently complete for the Permittees to confirm the Waste Matrix Code and waste
44 stream description, and verify the waste contains no residual liquids in excess of TSDF-WAC

1 ~~limits or compressed gases. Generator/storage site VE video/audio media subject to review by~~
2 ~~the Permittees shall meet the following minimum requirements:~~

- 3
- 4 ~~• The video/audio media shall record the waste packaging event for the container such that~~
5 ~~all waste items placed into the container are recorded in sufficient detail that a trained~~
6 ~~Permittee VE expert can determine what the waste items are and their associated waste~~
7 ~~material parameter.~~
- 8 ~~• The video/audio media shall capture the waste container identification number.~~
- 9 ~~• The personnel loading the waste container shall be identified on the video/audio media or~~
10 ~~on packaging records traceable to the loading of the waste container.~~
- 11 ~~• The date of loading of the waste container will be recorded on the video/audio media or~~
12 ~~on packaging records traceable to the loading of the waste container.~~

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

- 23
- 24 ~~• At least two generator site personnel shall approve the data forms or packaging logs~~
25 ~~attesting to the contents of the waste container.~~
- 26 ~~• The data forms or packaging logs shall contain an inventory of waste items in sufficient~~
27 ~~detail that a trained Permittee VE expert can identify the associated waste material~~
28 ~~parameters.~~
- 29 ~~• The waste container identification number shall be recorded on the data forms or~~
30 ~~packaging logs.~~

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

34 ~~B7-1c(1) Visual Examination Training~~

35

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

1 B7-1c(12) Visual Examination Oversight Quality Control

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

5
6 Confirmation VE data is assured by using standardized VE procedures and operator training.

7
8 ~~The Permittees shall designate at least one VE expert. The VE expert shall be familiar with the~~
9 ~~processes that were used to generate the waste streams being confirmed using VE. The VE~~
10 ~~expert shall be responsible for the overall direction and implementation of the Permittees' VE~~
11 ~~program. The Permittees shall specify the selection, qualification, and training requirements of~~
12 ~~the visual examination expert in an SOP.~~

13
14 B7-1d Quality Assurance Objectives (QAOs) for Radiography and Visual Examination

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

20
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
25 Data to meet these objectives must be obtained from a ~~video and audio~~ audio and video recorded
26 scan provided by trained confirmation radiography operators or certified characterization
27 programs. Results must also be recorded on a confirmation radiography data form. The
28 precision, accuracy, representativeness, completeness, and comparability objectives for
29 confirmation radiography data are presented below.

30
31 Precision

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

37
38 Accuracy

39
40 Accuracy is obtained by ~~using a target to tune the image for maximum sharpness and by~~
41 requiring confirmation operators to successfully identify 100 percent of the required items in a
42 training container during their initial qualification and subsequent requalification.

1 Representativeness

2
3 Representativeness is ensured by performing confirmation radiography on a random sample of
4 waste containers from each waste stream in each shipment.

5
6 Completeness

7
8 ~~A video and audio media recording of the radiography examination and a validated radiography~~
9 ~~data~~ The results of confirmation radiography will be documented on a confirmation form ~~will be~~
10 ~~obtained~~ for 100 percent of the waste containers subject to confirmation radiography.

11
12 Comparability

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

16
17 B7-1d(2) Visual Examination Quality Assurance Objectives QAOs

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

20
21 Precision

22
23 Precision is maintained by reconciling any discrepancies between the operator and the
24 independent technical reviewer with regard to ~~the waste stream waste confirmation,~~
25 identification of liquids in excess of TSDf-WAC limits; and identification of compressed gases.

26
27 Accuracy

28
29 Accuracy is maintained by requiring operators to pass a comprehensive examination and
30 demonstrate satisfactory performance ~~in the presence of the VE expert~~ during their initial
31 qualification and subsequent requalification.

32
33 Representativeness

34
35 Representativeness is ensured by performing confirmation VE on a random sample of waste
36 containers ~~within each waste stream in each shipment.~~

37
38 Completeness

39
40 ~~A validated VE data~~ confirmation form will be obtained for 100 percent of the waste containers
41 subject to confirmation VE.

1 Comparability

2
3 The comparability of confirmation VE data from different operators shall be enhanced by using
4 standardized VE procedures and operator training qualifications.
5

6 B7-1e Waste Stream Profile Form Review

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

11
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

17 B7-1e(1) Independent Technical Review

18 The confirmation radiography and/or ~~VE~~ confirmation data for each shipment shall receive an
19 independent technical review. This review will be performed before the affected waste shipment
20 is ~~shipped to~~ received at the WIPP facility. The review shall be performed by an individual other
21 than the data generator who is qualified to have performed the work. The review will be
22 performed in accordance with approved Permittee SOPs and will be documented on a review
23 checklist. The reviewer(s) must approve the data as evidenced by signature, and as a
24 consequence, ensure the following:
25

- 26 ~~• Data generation and reduction were conducted in a technically correct manner in~~
27 ~~accordance with the methods used (procedure with revision). Data were reported in the~~
28 ~~proper units and correct number of significant figures.~~
- 29 • The data have been reviewed for transcription errors.
- 30 • Radiography ~~video and audio~~ audio and video media recordings for the selected
31 container(s) have been reviewed to ensure audio and video provide acceptable playback
32 ~~(independent observation) on a waste container basis at a minimum of once per shipment~~
33 ~~or once per day of operation, whichever is less frequent. The radiography video/audio~~
34 ~~recording will be reviewed against the data reported on the Permittees' radiography form~~
35 ~~to ensure that the data are correct and complete. If review of radiography scans recorded~~
36 ~~by the generator/storage site was used to perform confirmation, two observations must be~~
37 ~~performed for each shipment or two observations per day, whichever is less frequent.~~
- 38 • The Quality Control checks have been performed (e.g., replicate scans).
- 39 • The data meet the established QAOs.

1 • The confirmation form indicates that the waste container data for the selected container
2 have been reviewed to ensure that the waste contains no ignitable, corrosive, or reactive
3 waste.

4 • The confirmation form indicates that the WSPF has been reviewed to ensure the waste
5 contains no ignitable, corrosive, or reactive waste and that the assigned Hazardous Waste
6 Numbers are allowed for storage and disposal at the WIPP.

7 Upon completion of the Independent Technical Review, the waste confirmation data for the
8 shipment shall be submitted to the WIPP facility operating record as non-permanent records.
9 Waste confirmation data includes radiography and VE confirmation forms, audio and video
10 media, and review checklists.

11
12 B7-1e(2) Permittee Management Review

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

- 19
20 • ~~The data are technically reasonable based on the technique used.~~
- 21 • ~~The data have received independent technical review.~~
- 22 • ~~The data indicate that the waste examined contained no ignitable, corrosive, or reactive~~
23 ~~waste and that the physical form of the waste was consistent with the waste stream~~
24 ~~description in the WSPF.~~
- 25 • ~~The data indicate that the Hazardous Waste Numbers are consistent with the approved~~
26 ~~WSPF.~~
- 27 • ~~QC checks have been performed (e.g., replicate scans, image quality checks).~~
- 28 • ~~The data meet the established QAOs.~~

29 ~~Upon completion of the Permittee management review, the waste confirmation data for the~~
30 ~~shipment shall be submitted to the WIPP facility operating record as non-permanent records.~~
31 ~~Waste confirmation data includes radiography and VE data forms, video/audio media, and~~
32 ~~review checklists.~~

33
34 B7-2 Noncompliant Waste Identified During Waste Confirmation

35 If the Permittees identify noncompliant waste during waste confirmation at a TRU waste
36 generator/storage site, (i.e., the waste does not match the waste stream description documented in

1 the WSPF or there are liquids in excess of TSDF-WAC limits or compressed gases) the waste
2 will not be shipped. The Permittees will suspend further shipments of the affected waste stream
3 and issue a Corrective Action Report (CAR) to the generator/storage site certified
4 characterization program. Shipments of affected waste streams shall not resume until the CAR
5 has been closed. The NMED will be notified within 24 hours of any suspension of waste stream
6 shipments due to the identification of noncompliant waste during waste confirmation.
7

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

21 If a generator/storage site certified characterization program certifies noncompliant waste from a
22 TRU waste site more than once during a running 90-day period, the Permittees will suspend
23 acceptance of that site's TRU waste site's waste until the Permittees find that all corrective
24 actions have been implemented and the site certified characterization program complies with all
25 applicable requirements of the WAP.

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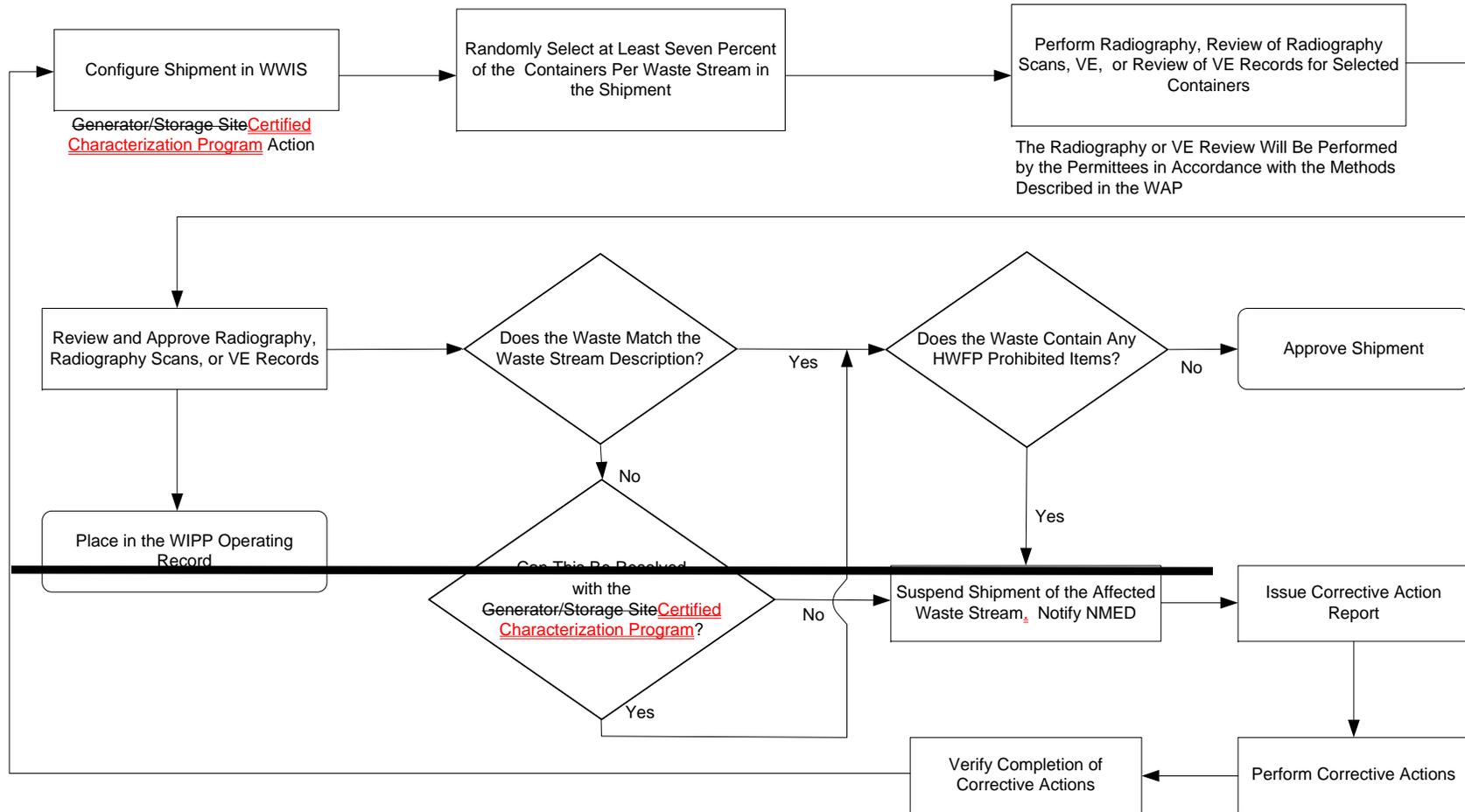
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FIGURES

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Figure B7-1
 Overview of Waste Confirmation