

ANNEX F to ATTACHMENT F
NON-WIPP SCREENING CRITERIA MEMO

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*Earth and Environmental Division (EES)
Carlsbad Operations
115 North Main Street
Carlsbad, New Mexico 88220
(505) 628-3934 FAX (505) 628-3238*

Date: February 24, 2003
Refer To: EES-12:03-099

Cynthia Zvonar
Office of Environmental Compliance, Assistant Manager
CBFO
Carlsbad, NM 88220

Subject: TRU Waste Inventory Report – 2003 Update

Dear Cindy,

In order to screen WIPP restricted waste streams from the Inventory LANL needs CBFO concurrence/guidance. We wish to have a meeting with you, Inés and members of your team to discuss these criteria. Specifically the following screening criteria obtained from the TWBIR rev. 3 and regulatory requirements must be considered:

- PCBs > 50ppm
- Dose > 1000 R/hr
- Classified
- Commercial/non-defense
- Pre- 1970 buried – Pit 9 at INEEL
- Unknown waste streams
- D001, D002 or D003 waste streams
- High tritium (Beryllium containing waste streams from INEEL)
- 23 Ci/L or (2300 Ci/m³) of maximum activity level averaged over the volume of the canister.

In addition, we would like to address excess Remote Handled Waste above the allocated 7080 m³ limit.

Please contact me at 628-1372 (cell: 505-706-0224) to provide a date and time that is convenient for this discussion.

Sincerely,

(SIGNATURE COPY ON FILE)

Sheila Lott
EES-12, Carlsbad Operations

SL:kag

Cynthia Zvonar

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2/24/03

Cy: Inés Triay, CBFO
Russ Patterson, CBFO
Steve Casey, CBFO
David Moody, LANL
Bev Crawford, LANL
EES-12 Files

**Memorandum to File
March 7, 2003**

The LANL-CO Inventory Team met with the Carlsbad Field Office Recertification Staff to discuss the TRU waste streams. Categories consistent with the baseline reports were discussed, as well as the placement of questionable waste components. The two categories are "Acceptable" (Appendix P) and "Excluded" (Appendix O) wastes. Wastes categorized as excluded can be further categorized into "potential future waste streams" and "all other waste streams."

The 2003 Compliance Recertification Application will provide data on emplaced TRU waste and anticipated inventory. In the Transuranic Baseline Inventory Report there was a section that had a separate appendix denoting wastes excluded from WIPP and possible future wastes for WIPP. The LANL-CO team wanted to discuss the screening criteria that will be used for the Transuranic Waste Inventory Update Report, 2003 for these wastes.

For purposes of demonstrating compliance with the long-term disposal regulations, the WIPP performance assessment (PA) process will examine the 2003 inventory (both received and anticipated) for differences from the compliance basis (Compliance Certification Application, 1996). If different, the PA will utilize the updated values to assess the long-term behavior of the repository. The inventory data to be analyzed will include the acceptable waste streams, and the excluded – potential future waste listed in the table below.

Screening Criteria	Decision Made
PCBs > 50ppm	Acceptable (pending EPA – Region 6 approval)
Dose > 1000 R/hr	Excluded
Classified waste	Acceptable
Commercial	Excluded
Non-defense waste that is likely defense, but no official determination	Acceptable (with indicating explanation)
Pre-1970 buried waste	Excluded
Pit 9 waste at INEEL	Acceptable (test waste only [~120 m ³])
Unknown waste streams	Excluded
D001, D002, D003 waste streams	Acceptable (with treatment to remove the EPA codes)
Beryllium-containing waste streams, (e.g., beryllium reflectors at INEEL)	Excluded
>23 Ci/L or (23,000Ci/ cubic meters) of maximum activity level averaged over the volume of the canister	Excluded
Sodium-Bearing Waste from INEEL	Excluded – Potential Future Waste
RH TRU waste > 7,080 cubic meter limit	Excluded

The team was reminded to keep in mind when scaling the RH TRU waste of the 5% limit of RH TRU between 100R/hr and 1000R/hr.

DOE/CBFO Recertification Representative
Recertification Representative


Steve Casey

LANL-CO Inventory Lead


Sheila Lott