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Date: MAR 2 1 2016
Symbol: ADESH-16-029
LA-UR: 16-20638
Locates Action No.: N/A

Mr. John E. Kieling, Chief
Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, NM 87505-6303

Dear Mr. Kieling:

Subject: Response to Ordered Action 8, Attachment A to Settlement Agreement and Stipulated Final Order HWB-14-20

This letter responds to Ordered Action (OA) No. 8, page 12 in Attachment A to the Settlement Agreement and Stipulated Final Order HWB-14-20 (SFO) entered into by the New Mexico Environment Department (NMED) (Complainant) and the U.S. Department of Energy (DOE) and Los Alamos National Security, LLC (LANS) (Respondents) on January 22, 2016. Paragraph 35 of the SFO requires the Respondents to complete corrective actions (called "Ordered Actions" in the "Topic" column of Attachment A of the SFO). Ordered Action 8 required that

> *"No later than 60 days after this Order becomes final, Respondents shall revise and submit to NMED the CCP/LANL interface agreement to ensure appropriate organizations and subject matter experts communicate effectively and timely regarding changes in waste management procedures, waste generation, waste treatment, waste repackaging and remediation, waste stream delineation, and waste characterization procedures to ensure that AK documentation is accurate, sufficient, and updated."*

Please find enclosed a copy of the revised, approved *CCP/LANL Interface Document*, which is the documentation to be submitted as evidence of completion of this Ordered Action (as specified in Attachment A to the SFO). It is included as an Appendix to Enclosure 1.

The Respondents would be pleased to meet with NMED-HWB personnel to discuss and explain the documentation included herein. If you have comments or questions regarding this submittal, please contact Mark P. Haagenstad (LANS) at (505) 665-2014 or David Nickless (EM-LA) at (505) 665-6448.

Sincerely,

Michael T. Brandt, DrPH, CIH
Associate Director
Environment, Safety & Health
Los Alamos National Security, LLC
Los Alamos National Laboratory

Sincerely,

Kimberly Davis Lebak
Manager
Los Alamos Field Office
U.S. Department of Energy

MTB:PM:MPH/lm

Enclosures: (1) Response to Ordered Action 8, Attachment A to Settlement Agreement and Stipulated Final Order HWB-14-20 (with appendix)

Cy: Ryan Flynn, NMED, Santa Fe, NM, (E-File)
Kathryn M. Roberts, NMED, Santa Fe, NM, (E-File)
Siona Briley, NMED/HWB, Santa Fe, NM, (E-File)
Neelam Dhawan, NMED/HWB, Santa Fe, NM, (E-File)
Todd Shrader, Manager, CBFO, (E-File)
J.R. Stroble, National TRU Program, CBFO, (E-File)
Kimberly Davis Lebak, NA-LA, (E-File)
Douglas E. Hintze, EM-LA, (E-File)
Peter Maggiore, NA-LA, (E-File)
Lisa Cummings, NA-LA, (E-File)
Ben Underwood, EM-LA, (E-File)
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Jody Pugh, NA-LA, (E-File)
Jordan Arnswald, NA-LA, (E-File)
Kirsten M. Laskey, EM-LA, (E-File)
Craig Simmons, CCP, (E-File)
Craig Leasure, PADOPS, (E-File)
William Mairson, PADOPS, (E-File)
Peter H. Carson, NPI-7, (E-File)
Randall M. Erickson, ADEM, (E-File)
David Funk, ADEM, (E-File)
Enrique Torres, ADEM, (E-File)
Kenneth M. Hargis, WD-WPE, (E-File)
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Date: MAR 2 1 2016
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Locates Action No.: N/A

RECEIVED

NMED
Hazardous Waste Bureau

Mr. John E. Kieling, Chief
Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, NM 87505-6303

Dear Mr. Kieling:

Subject: **Response to Ordered Action 8, Attachment A to Settlement Agreement and Stipulated Final Order HWB-14-20**

This letter responds to Ordered Action (OA) No. 8, page 12 in Attachment A to the Settlement Agreement and Stipulated Final Order HWB-14-20 (SFO) entered into by the New Mexico Environment Department (NMED) (Complainant) and the U.S. Department of Energy (DOE) and Los Alamos National Security, LLC (LANS) (Respondents) on January 22, 2016. Paragraph 35 of the SFO requires the Respondents to complete corrective actions (called "Ordered Actions" in the "Topic" column of Attachment A of the SFO). Ordered Action 8 required that

> *"No later than 60 days after this Order becomes final, Respondents shall revise and submit to NMED the CCP/LANL interface agreement to ensure appropriate organizations and subject matter experts communicate effectively and timely regarding changes in waste management procedures, waste generation, waste treatment, waste repackaging and remediation, waste stream delineation, and waste characterization procedures to ensure that AK documentation is accurate, sufficient, and updated."*

Please find enclosed a copy of the revised, approved *CCP/LANL Interface Document*, which is the documentation to be submitted as evidence of completion of this Ordered Action (as specified in Attachment A to the SFO). It is included as an Appendix to Enclosure 1.

CERTIFICATION

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

3/1/16

Michael T. Brandt, DrPH, CIH
Associate Director
Environment, Safety, and Health
Los Alamos National Security, LLC
Los Alamos National Laboratory
Operator

Date Signed

3/16/16

Kimberly Davis Lebak
Manager
Los Alamos Field Office
U.S. Department of Energy
Owner/Operator

Date Signed

ENCLOSURE 1

Response to Ordered Action 8
Attachment A to Settlement Agreement and Stipulated
Final Order HWB-14-20

ADESH-16-029

LA-UR-16-20638

Date: MAR 2 1 2016

List of Appendices

Appendix 1	Revised *CCP/LANL Interface Document*, CCP-PO-012, Rev16, Draft E, February 26, 2016 (redline of final)
Appendix 2	Revised *CCP/LANL Interface Document*, CCP-PO-012, Rev16, February 26, 2016 (clean copy)

Enclosure 1

Response to Ordered Action 8, Attachment A to Settlement Agreement and Stipulated Final Order HWB-14-20

INTRODUCTION:

This document responds to Ordered Action (OA) No. 8, page 12 in Attachment A to the Settlement Agreement and Stipulated Final Order HWB-14-20 (SFO) entered into by the New Mexico Environment Department (NMED) (Complainant) and the U.S. Department of Energy (DOE) and Los Alamos National Security, LLC (LANS) (Respondents) on January 22, 2016. The SFO was entered into to resolve Administrative Compliance Order (ACO) HWB-14-20, issued to Respondents on December 6, 2014.

Ordered Action No. 8 states that

> *"No later than 60 days after this Order becomes final, Respondents shall revise and submit to NMED the CCP/LANL interface agreement to ensure appropriate organizations and subject matter experts communicate effectively and timely regarding changes in waste management procedures, waste generation, waste treatment, waste repackaging and remediation, waste stream delineation, and waste characterization procedures to ensure that AK documentation is accurate, sufficient, and updated."*

RESPONSE:

The document required by SFO Attachment A, Ordered Action No. 8 is the *CCP/Los Alamos National Laboratory (LANL) Interface Document,* Central Characterization Program (CCP) document no. CCP-PO-012. The new revision is Revision 16. Copies are attached as outlined below.

Documentation to Provide as Evidence of Completion (per SFO Attachment A)	Location in this Enclosure
Copy of CCP/LANL interface agreement [revised, approved]	Appendix 1 (redline/strikeout copy) Appendix 2 (clean copy)

The following discussion briefly describes the *Interface Document* and explains how it satisfies the Ordered Action.

Previous versions of the *Interface Document* have been in place between CCP and LANL since 2003, shortly after the U.S. Department of Energy (DOE) Carlsbad Field Office (CBFO) directed its contractor, the Central Characterization Program, to provide assistance to the transuranic (TRU)

waste processing program at the LANL site. CCP provides services to most major DOE waste generating sites through site-specific Statements of Work (SOWs) for characterization of contact-handled and remote-handled transuranic (TRU) waste that is being certified for disposal at the Waste Isolation Pilot Plant (WIPP). The *Interface Document* establishes and defines the interfaces between CCP and LANS that are necessary to implement the requirements of the LANL TRU Waste Program, and details how the services described in the DOE/CCP SOW and LANL/CCP SOW are to be executed on the LANL facility.

There were three major focus areas for the revision.

- Much emphasis was placed on clarifying each organization's roles and responsibilities to develop, compile, review and share acceptable knowledge (AK)[1] information, especially as it relates to changes in waste management procedures, waste generation, waste treatment, waste repackaging and remediation, waste stream delineation, and waste characterization procedures.
- Changes were made to formalize the interfaces between CCP and all current LANL customer organizations. Historically, CCP has provided support to and interacted primarily with the Associate Directorate Environmental Management (ADEM) and its predecessors. In 2016, CCP also provides support to and interacts directly with other LANL customer organizations, including the Associate Directorate Plutonium Science and Manufacturing (ADPSM) and the Nuclear Engineering Nonproliferation Division (NEN) Off-Site Source Recovery Program (OSRP).
- Existing interfaces between CCP and LANL customer organizations were strengthened and clarified.

The revised *Interface Document* was issued on February 26, 2016. A redline copy showing the changes made in Revision 16 (called "Draft E") is provided in Appendix 1 to this Enclosure, and a clean copy is provided in Appendix 2.

[1] Revisions addressing use of AK were made to ensure compliance with AK requirements as they are defined in the LANL and Waste Isolation Pilot Plant Permits, and the current revision of CCP's *Acceptable Knowledge Documentation* procedure.

Appendix 1

Revised *CCP/LANL Interface Document*, CCP-PO-012, Rev16, Draft E, February 26, 2016
(redline of final)

CCP-PO-012

Revision 16, Draft E

CCP/Los Alamos National Laboratory (LANL) Interface Document

EFFECTIVE DATE: XX/XX/2016

PRINTED NAME

APPROVED FOR USE

RECORD OF REVISION

Revision Number	Date Approved	Description of Revision
0	10/21/2003	Initial Issue.
1	12/16/2003	Revised the Scope of the document. Updated Section 2.1 References. Updated Section 3.0, steps 3.7 VPM responsibilities and inserted step 3.10 LANL SPQAO responsibilities. Corrected referenced section in step 4.14.4. Updated Figure 1.
2	04/20/2004	Interface Document updated to reflect changes in work scope and joint organizational responsibilities.
3	04/26/2004	Incorporated CBFO Adequacy Review Comment resolutions to Section 1.0 and inserted step 4.17.
4	03/31/2006	Revised to make organizational changes, changes to be consistent with Statement of Work (SOW) clarifications, and changes to reflect coordination details learned during Fiscal Year (FY) 2004. Revised based on the Implementation Plan for CCP Characterization Operations Improvements.
5	11/16/2006	Revised to incorporate controls in the Central Characterization Project (CCP) Basis for Interim Operation (BIO) for the Waste Isolation Pilot Plant (WIPP) Mobile Characterization Units and to provide notifications between the Host site, CCP, and WIPP site. Revised to implement the Waste Isolation Pilot Plant Hazardous Waste Facility Permit requirements resulting from the Section 311/Remote-Handled (RH) Permit Modification Request (PMR).
6	08/06/2007	Revised to clarify Authorization Basis and Configuration Management requirements and editorial changes.
7	05/08/2008	Revised to reflect corrective actions identified during accident investigation and follow-up safety assessments.
8	12/29/2010	Minor revision to update references to the *Waste Isolation Pilot Plant Hazardous Waste Facility Permit.*
9	01/04/2012	Revised to incorporate box line operating procedures, CCP-TP-059, *CCP Operating the Super High Efficiency Neutron Counter (SuperHENC) Using NDA 2000,* and CCP-TP-198, *CCP HE-RTR Operating Procedure,* and make any editorial changes necessary.
10	07/09/2012	Procedure is being revised to correctly describe the process for receiving Central Procurement Project supplied commodities at Los Alamos National Laboratory.

RECORD OF REVISION (Continued)

Revision Number	Date Approved	Description of Revision
11	10/01/2012	Revised to incorporate Nuclear Waste Partnership (NWP) transition changes.
12	11/05/2012	In response to CAR-LANL-0003-12, revised to clarify roles associated with providing measuring and testing equipment (M&TE) Certificates of Calibration to Central Characterization Program (CCP).
13	06/25/2013	Incorporate the Gas Generation Testing (GGT) process, In Situ Object Counting Systems (ISOCS) process, and editorial changes. Revised to implement the Permit Modification Request Class 2 approved by New Mexico Environment Department (NMED) dated March 13, 2013.
14	10/30/2013	Incorporate CCP-TP-068, *CCP Standardized Container Management* for container management and incorporate additional responsibility titles for operations at Technical Area (TA)-55.
15	01/23/2014	Revised to provide the allowance to use either CCP-TP-120, *CCP Container Management* or CCP-TP-068, *CCP Standardized Container Management,* for container management.
16	XX/XX/2016	Revised format and content to better align with standardized Central Characterization Program (CCP) interface document format and to address enhancements pertaining to the Acceptable Knowledge (AK) process, and to realign responsibilities based on Host site reorganization.

TABLE OF CONTENTS

LIST OF ATTACHMENTS

LIST OF FIGURES

1.0 PURPOSE

Through the Performance Management Plan (PMP) of July 2002, the U.S. Department of Energy (DOE) Carlsbad Field Office (CBFO) designated the Central Characterization Program (CCP) to provide assistance to the waste processing portion of the Transuranic (TRU) Program at the Los Alamos National Laboratory (LANL) site. ~~A Statement of Work (SOW) ("Statement of Work for Characterization of LANL TRU Waste Contact-Handled [CH] and Remote Handled [RH]") describes the assistance to be provided to CCP by LANL.~~ This document establishes the CCP/LANL interfaces between CCP and Los Alamos National Security, LLC (LANS) necessary to implement the requirements of the TRU Waste Program. ~~This Interface Document, subordinate to the SOW, defines the interfaces between CCP and Los Alamos National Security (LANS) and details how the services described in the SOW are to be executed.~~ All activities discussed in this document apply to the TRU Waste ~~Project~~ Program whether identified, conducted or implemented by CCP or LANS personnel.

1.1 Scope

~~As the waste generator, LANS maintains ownership of the waste and responsibility for its disposal. This responsibility includes additional chemical sampling and analysis deemed necessary by the WIPP Permittees.~~ LANS is responsible to provide the infrastructure and associated programs necessary to support all activities described in this Interface Document. ~~As set forth in the SOW,~~ CCP will assist LANS by (a) providing a Waste Isolation Pilot Plant (WIPP)-certified program for the characterization, certification, and shipment of LANL TRU wastes, (b) training and qualifying personnel so that they can perform activities under the CCP WIPP-certified program in compliance with DOE Orders relevant to nuclear facilities, (c) providing services, personnel, and equipment to augment LANS required activities.

These services will be performed with CCP and/or Host site equipment operated with appropriate DOE/CBFO certified procedures. ~~The Host~~ CCP may train Host site ~~may augment~~ personnel to perform CCP characterization ~~efforts~~ activities as ~~required~~ needed and agreed to by ~~CCP~~the Host site.

Host site maintains ownership of the waste and responsibility for its disposal. This responsibility includes additional chemical sampling and analysis deemed necessary by the WIPP Co-Permittees.

The Host site has primary responsibility for assuring that requirements for safety (including Radiological Control, Emergency Management, Industrial Hygiene and Safety), security, safety basis, environmental protection, compliance, and other areas are met for CCP activities.

CCP will work under LANS' approved Environment, Safety, and Health (ES&H) ~~Plan~~Program. On-site CCP personnel will be trained to and comply with LANL hazardous and solid waste regulatory requirements. LANS is responsible for supervising and overseeing the implementation of LANS' ES&H ~~Plan~~Program, including compliance with Federal, State, and Local regulations protecting workers, the environment, waste management/disposal, and chemical usage. LANS has responsibility for taking such action as is deemed necessary to ensure compliance with Resource, Conservation and Recovery Act (RCRA), and Toxic Substances Control Act (TSCA), DOE Orders and LANS' requirements related to environmental compliance and waste management within LANL.

CCP has responsibility for the safety of CCP employees, CCP subcontractors, and its lower-tier subcontractors as defined in this document~~, the SOW, and the Memorandum of Agreement.~~ LANS is responsible for reporting conditions or concerns that may have safety, health, quality assurance (QA), security, operational or environmental implications; and therefore, LANS will provide oversight to this scope as set forth in Section 6.0~~4.2.5~~. ~~LANL TRU Program (LTP)~~ TRU Program activities, whether performed by CCP personnel or CCP activities performed by LANS personnel at LANL will be under the control of the CCP LANL Project Manager/Designee and ~~LTP Program Manager~~ Responsible Division Leader/Designee except for the Nuclear Waste Partnership (NWP) Assurance Programs Manager (See Figure ~~1~~2, Nuclear Waste Partnership – LANL), and CCP activities at LANL will be directly under the control of the ~~LANS/~~CCP LANL Project Manager/Designee. In turn, the CCP LANL Project Manager/Designee will report through the ~~LTP Waste Disposition Project~~ specific Responsible Division Leader/Designee for the program/project being supported~~Directorate~~.

This document applies to all personnel identified on the detailed LANS/CCP organization charts shown in Figures ~~1~~2 through Figure 5.~~and Figure 2, Waste Disposition Project with responsibilities for supporting the activities identified in the SOW.~~

This document addresses responsibilities associated with TRU waste characterization and certification as well as other characterization support provided to LANL by CCP. This document also defines interface requirements for the following areas:

- Initial Setup for Operations
- Routine Operations
- Training
- Container Management
- Deficiencies
- Visual Examination (VE) and Prohibited Item Disposition (PID)
- Filter Inspection/Filter Change out
- Real-Time Radiography~~Nondestructive Examination (NDE)~~
- Nondestructive Assay (NDA) (certified and non-TRU waste data)
- Source Control
- Flammable Gas Analysis (FGA)
- Acceptable Knowledge (AK)
- Off-Site Source Recovery Program (OSRP)
- Project Office Certification Activities
- Transportation
- Measurement and Test Equipment (M&TE)
- Procedures
- Documents/Records
- Procurement
- Oversight
- QA
- Price-Anderson Amendments Act (PAAA)
- 10 Code of Federal Regulations (CFR) Part 851, *Worker Safety and Health Program*
- ~~Drum Venting~~
- Gas Generation Test (GGT)

2.0 REQUIREMENTS

2.1 This document implements the applicable requirements of the following:

- CCP-PO-001, *CCP Transuranic Waste Characterization Quality Assurance Project Plan*
- CCP-PO-002, *CCP Transuranic Waste Certification Plan*
- CCP-PO-003, *CCP Transuranic Authorized Methods For Payload Control (CCP CH-TRAMPAC)*
- CCP-PO-005, *CCP Conduct of Operations*
- CCP-PO-026, *CCP Configuration Management*
- DOE/WIPP-02-3183, *CH Packaging Program Guidance*
- DOE/WIPP-06-3345, *Waste Isolation Pilot Plant Flammable Gas Analysis*
- DOE/WIPP-94-1012, *Quality Assurance Program Document*, Carlsbad New Mexico, U.S. DOE Carlsbad Field Office
- WP 13-1, *Nuclear Waste Partnership LLC, Quality Assurance Program Description*
- PD103, *Worker Safety and Health Program*
- P121, *Radiation Protection*

2.2 Acronyms and Key Definitions

Attachment 1, Acronyms and Key Definitions, lists acronyms and key definitions used in this Interface Document.

2.3 Criteria

The CCP Certified Program will be used to characterize, certify, and ship LANL's TRU waste to WIPP. The specific requirements documents to ensure compliance with the certified program are listed in Attachment 2, Reference Documents.

There are Host site documents used that are not part of the CCP Certified Program. These documents are listed in Attachment 3, LANS Host Site Required Documents.

3.0 RESPONSIBILITIES

CCP has primary responsibility for performing TRU waste characterization, certification, and transportation activities in accordance with governing requirements described herein. CCP services include compilation, reporting, and confirmation of acceptable knowledge (AK), nondestructive examination (NDE), which includes real time radiography (RTR), and visual examination (VE), nondestructive assay (NDA), Flammable Gas Analysis (FGA) for transportation, data validation and verification, waste certification, WIPP Waste Information System/Waste Data System (WWIS/WDS) data entry, and transportation activities. Through the characterization activities performed, CCP provides support to LANL in demonstrating compliance with Policy P409, *LANL Waste Management,* and the *LANL Hazardous Waste Facility Permit*.

The Host site's responsibilities are limited to the CCP activities described herein being performed on their behalf and for performing TRU waste management activities in accordance with Host site/generator documents provided to CCP.

NOTE

The titles for LANL personnel delineated ~~in~~ throughout the ~~Responsibilities section~~ document are ~~specific to LTP~~ generic. Communications paths are depicted on Figure 1, CCP-LANL Communications Flow Chart.~~operations at Technical Area (TA) 50 and TA-54. Titles for operations outside of LTP are included in Attachment 4, LANL Responsibilities Crosswalk.~~

3.1 CCP LANL Project Manager/Designee

3.1.1 Confirms that waste characterization activities are conducted at LANL per the ~~SOW requirements and the~~ Interface Document.

3.1.2 Provides primary oversight for project safety, and compliance of CCP personnel at LANL to CCP's certified program requirements.

3.1.3 Requests personnel and equipment from the ~~LANS LTP Director~~Responsible Division Leader/Designee to support characterization, certification, and transportation, as required.

3.1.4 Provides support to the CCP Site Project Manager (SPM).

3.1.5 Receives documentation of required and completed LANL site-specific training.

3.1.6 Provides weekly production reports to the DOE/CBFO and LANS ~~Production Control Manager~~ Responsible Division Leader/Designee.

3.1.7 Receives reports of LANS oversight activities from ~~Environmental Waste Management Operations (EWMO)~~ Facility Operations Director (FOD) and Responsible Division Leader/Designee and formally responds, as required.

3.1.8 Interfaces with DOE/CBFO through the CCP Project Office.

3.1.9 Requests special nuclear material sources from LANS ~~NDA Team Leader~~ Responsible Division Leader/Designee.

3.1.10 Ensures CCP personnel comply with LANS integrated work management, environmental, safety, and security requirements.

3.1.11 Ensures CCP procedures are approved by Host site.

3.1.12 Manage CCP support within agreed to funding and scope.

3.1.13 Function as the point of contact to coordinate CCP reviews of LANL procedures and waste processing plans by appropriate CCP SMEs. The review will analyze impacts on the CCP characterization process as well as requirements specified in DOE/WIPP 02-3122, *Transuranic Waste Acceptance Criteria For The Waste Isolation Pilot Plant* (WIPP-WAC); *Contact-Handled Transuranic Waste Authorized Methods for Payload Control* (CH-TRAMPAC); *Waste Isolation Pilot Plant Hazardous Waste Facility Permit, Waste Analysis Plan* (WIPP-WAP).

3.1.14 Participate on the Waste Processing Integrated Process Control Teams (IPCTs) for waste that will be shipped to WIPP.

3.1.15 Interface with the Waste Characterization and Processing Review Board.

3.1.16 Ensure that characterization data generated by CCP in the process of waste characterization including RTR, VE, NDA and FGA is available to the Responsible Division Leader/Designee.

3.2 LANS Program Manager

3.2.1 Negotiate with CCP Project Manager to establish scope of work, needed resources and associated funding required to complete the agreed to scope.

3.2.2 Ensure agreed to funding is provided to CCP to support onsite activities in support of LANS.

3.3 Responsible Division Leader/Designee

3.3.1 Formally designate LANS personnel responsible for performing key responsibilities and communicate designees to CCP LANL Project Manager.

~~3.4 LANS LTP Director/Designee~~

~~3.4.1~~3.3.2 Ensures ~~LTP~~ LANS completes performance measures/metrics as established by appropriate local DOE~~/Los Alamos Site~~ office ~~(LASO)~~.

~~3.4.2~~3.3.3 Functions as the point of contact with CCP LANL Project Manager for coordination and review of CCP procedures, plans, waste stream profile forms, AK Summary Reports, CCP Interface Waste Management Document Lists (IWMDL) and CCP Acceptable Knowledge Assessments (AKAs) and configuration management documents.

~~3.4.3~~3.3.4 Ensures cognizant Host site and generator Point of Contacts/Subject Matter Experts (SMEs) are identified and available as necessary to support the review of CCP documents defined in step 4.24.5.

~~3.4.4~~3.3.5 Coordinates review, provides comments, and approves comment resolutions on documents listed in Section 4.24.5. This includes facilitating generator document review and comment resolution as necessary. The review and comment resolution will be documented in accordance with CCP-QP-010, *CCP Document Preparation, Approval, and Control*.

~~3.4.5~~3.3.6 Ensures CCP personnel have access to facilities to observe operations and interview personnel associated with generation, packaging, repackaging, or treatment of TRU waste.

~~3.4.6~~3.3.7 Interfaces with DOE/CBFO through the appropriate local DOE/~~LASO~~ office.

3.3.8 Coordinates all LANS activities in support of TRU Programs working with CCP LANL Project Manager/Designee.

3.3.9 Manages the control, and tracking of containers through the CCP characterization process utilizing the CCP SPM-designated container selection list (AK Tracking Spreadsheet).

3.3.10 Ensures that applicable container tracking information is maintained and kept current as required to LANL site requirements.

3.3.11 Generates and submits regular, periodic production reports.

3.3.12 Ensures Unreviewed Safety Question Determinations (USQD) are completed to ensure that CCP operations and activities are performed in accordance with the applicable Safety Basis Documents.

3.3.13 Ensures modifications to CCP procedures, equipment, and facilities undergo Host site review and USQD.

3.3.14 Responsible for ensuring project compliance with LANS Waste Management and Environmental Compliance requirements.

3.3.15 Ensures that containers are processed in conjunction with the CCP SPM or CCP Vendor Project Manager (VPM).

3.3.16 Ensures Material at Risk (MAR) inventory limits established by the Documented Safety Analysis (DSA) for each facility, are not exceeded.

3.3.17 Approves CCP health and safety-specific documents, including Integrated Work Documents (IWDs), as the Responsible Line Manager (RLM).

3.3.18 Ensures Facility Service Requests submitted by CCP are completed within a time frame agreed to by the LANL CCP Project Manager/Designee.

3.3.19 Provides temperature-controlled environment for staging waste containers prior to real-time radiography (RTR) when temperatures are below freezing.

3.3.20 Provides Lockout/Tagout (LO/TO) support for work performed on the CCP equipment.

3.3.21 Provides work control resources for corrective or preventive maintenance on LANS-owned utilities or equipment or on CCP-owned equipment, as requested.

3.3.22 Ensures facility-specific training requirements for CCP operations at LANL are defined, training plans are established and implemented, and information on training status is provided to CCP Training.

3.3.23 Ensures notification is made to CCP of any new training requirements.

3.3.24 Coordinates Radiological Control Technician support and dosimetry for characterization and transportation operations.

3.3.25 Coordinates Industrial Hygiene support for characterization and transportation operations.

3.3.26 Participates in Readiness Assessments or surveillances, as required.

3.3.27 LANS personnel perform waste handling operations in support of CCP as assigned by LANS supervision.

3.3.28 Provides Source Custodian support to maintain nuclear material source control in accordance with LANS requirements.

3.3.29 Designates LANL Cognizant Host site/Generator Personnel (CP) to interact with the CCP Acceptable Knowledge Expert (AKE) and assist the AKE with AK collection.

3.3.30 Ensures that AK Summary Reports, AKA, and Waste Stream Profile Forms are routed to the Waste Management Division Leader for approval.

3.3.31 Distributes results of the AKA to designated CPs for review and comment.

3.3.32 Concurs with final AKA in writing.

3.3.33 Works with the Waste Management Coordinator to comply with Policy P409 and update the operating record for waste activities performed by CCP.

3.3.34 Provides Waste Management Division Leader/ Designee with the results of Acceptable Knowledge Assessments (AKA), surveillances and other assessments for the determination of accurate, sufficient, and up-to-date waste characterization.

3.3.35 Provides leadership and direction to ensure that LANL waste is compliantly characterized, managed, stored, and transported.

3.3.36 Engages Waste Management Division Leader in the review and comment resolution of AK Summary Reports and CCP AKAs.

~~3.4.7~~3.3.37 Ensures that characterization information collected by CCP including RTR, NDA, FGA, and VE gets captured in WCATs as required by Policy P409.

~~3.4.8~~3.3.38 Provides documentation of surveillances and audits, applicable to CCP, to the CCP LANL Project Manager/Designee.

~~3.4.9 Requests resources to implement the integrated schedule for TRU waste.~~

3.~~5~~3.4 ~~Environmental Waste Management Operations (EWMO)~~ Facilities Operations Director (FOD)/Designee

~~3.5.1~~3.4.1 Provides documentation of ~~applicable~~ surveillances and audits, applicable to CCP, to the CCP LANL Project Manager/Designee.

~~3.5.2~~3.4.2 Ensures that new and/or modifications to documents or equipment for work performed in support of TRU waste activities at nuclear facilities are approved prior to implementation.

~~3.5.3~~3.4.3 Ensures configuration management of LANS-owned equipment is maintained.

[A] Ensures that adequate information is provided to CCP on LANS-owned equipment prior to acceptance and turnover of equipment to CCP.

~~Ensures facility and/or equipment modification requests to LANS-owned equipment and facilities are submitted to EWMO-TRU~~

~~Waste Operations for approval and are fully defined.~~

~~3.5.4 Ensures change control notice is submitted for changes to previously agreed upon modification requests.~~

~~3.5.5~~3.4.4 Ensures CCP/LANS personnel comply with LANS integrated work management, environmental, safety, and security requirements through document reviews, emergency drills, monitoring, surveillances and audits. ~~CCP will cooperate with and accommodate these oversight activities.~~

~~3.5.6~~3.4.5 Ensures new CCP activities follow the LANL readiness review requirements.

~~3.5.7~~3.4.6 Ensures Technical Safety Requirements (TSR) surveillances are conducted as required.

3.4.7 Ensures Fire Protection and other facility surveillances, are performed when required.

~~3.5.8~~3.4.8 Releases approved CCP Integrated Work Documents (IWDs).

~~3.6~~3.5 CCP Site Project Manager (SPM)

~~3.6.1~~3.5.1 Functions as CCP's primary interface and point-of-contact between CCP and LANS for certification activities (e.g., data management).

~~3.6.2~~3.5.2 Ensures the AK Summary Reports and ~~drum~~ container lists for LANL waste streams are prepared, approved, and issued.

~~3.6.3~~3.5.3 Ensures the preparation and approval of waste stream profile forms (WSPFs), as required.

~~3.6.4~~3.5.4 Provides evidence to the CCP LANL Project Manager/Designee and ~~LTP Director~~ Responsible Division Leader/Designee of the DOE/CBFO Performance Demonstration Program (PDP) participation and successful completion for each operating system.

~~3.6.5~~3.5.5 Responsible for project level verification and validation of batch data reports (BDRs).

~~3.6.6~~3.5.6 Provides support to the CCP LANL Project Manager/Designee.

~~3.6.7~~3.5.7 Ensures that software used by CCP at LANL is controlled in accordance with CCP-QP-022, *CCP Software Quality Assurance Plan*. LANL retains ownership and licenses of LANL developed/procured software.

3.5.8 Confirms that in-process documents are transmitted to the CCP Project Office as soon as practicable.

3.5.9 Provides Responsible Division Leader/Designee with the results of Acceptable Knowledge Assessments (AKA).

3.5.10 Coordinate presentation of AK briefings to CCP characterization personnel POCs/SMEs and cognizant Host site/generator SMEs and CPs.

3.5.11 Provide AKE and Responsible Division Leader/designee quarterly notifications that the IWMDL are current.

~~3.6.8~~3.5.12 Transmit the AKA to the Responsible Division Leader/designee for distribution to SME to verify accuracy and completeness and obtain concurrence signature from the Responsible Division Leader/designee.

~~3.7~~3.6 Acceptable Knowledge Expert (AKE)

~~3.7.1~~3.6.1 Collect, compile, and review AK documentation in accordance with CCP-TP-005, *CCP Acceptable Knowledge Documentation.*

3.6.2 Ensures CCP has obtained necessary container information prior to characterization.

3.6.3 Interacts directly with the Responsible Division Leader/ Designee to ensure accurate, sufficient, and up-to-date waste characterization information is provided.

3.6.4 Work in conjunction with Responsible Division Leader/ Designee to develop an IWMDL for each waste stream.

3.6.5 Work with cognizant Host site/generator personnel to resolve comments and questions.

3.6.6 Submit IWMDL and associated quarterly ~~SMR~~Responsible Division Leader/Designee notification to the SPM to submit to records.

3.6.7 Performs an AKA for each waste stream.

~~3.7.2 Performs Chemical Compatibility Evaluations.~~

~~3.8~~3.7 NWP QA Engineer/Designee~~Assurance Programs Manager~~

~~3.8.1~~3.7.1 Reports to the ~~Nuclear Waste Partnership (~~NWP~~)~~ QA Assurance Programs Manager to maintain functional authority and independence from cost and schedule considerations.

~~3.8.2~~3.7.2 Functions as CCP's primary interface and point-of-contact for QA issues between the CCP and LANS.

~~3.8.3~~3.7.3 Validates Nonconformance Reports (NCRs).

~~3.8.4~~3.7.4 Provides semi-annual trending summary reports to the CCP SPM.

~~3.8.5~~3.7.5 Ensures surveillances of waste characterization activities at LANL are performed on a periodic basis and surveillance reports are provided to the CCP SPM, the CCP LANL Project Manager/Designee, and the ~~LTP Project Director~~ Responsible Division Leader/Designee.

~~3.8.6~~3.7.6 Performs receipt inspection of procured items in accordance with CCP and Host site requirements.

~~3.8.7~~3.7.7 Provides assistance in generation, disposition, and closure of NCRs and ~~Corrective Action Reports (CARs)~~WIPP Forms.

~~3.8.8~~3.7.8 Coordinates with the CCP LANL Project Manager/Designee for any potential Noncompliance Tracking System-Reportable PAAA issues or any occurrence reports resulting from activities under the CCP Certified Program.

~~3.9~~3.8 CCP Vendor Project Manager (VPM)/Designee

~~3.9.1~~3.8.1 Obtains Host site management daily release/approval prior to performing CCP operations.

~~3.9.2~~3.8.2 Responsible for safety and health of CCP personnel at LANL.

~~3.9.3~~3.8.3 Monitors the List of Qualified Individuals (LOQI) daily to confirm that only qualified personnel perform waste characterization and transportation activities.

~~3.9.4~~3.8.4 Controls access of CCP personnel including its subcontractors to the field. Request site access for visitors and provide full-time escorts.

~~3.9.5~~3.8.5 Functions as CCP's primary interface and point-of-contact between CCP and LANL for characterization activities (operations).

~~3.9.6~~3.8.6 Supports training and briefing of personnel in regards to procedural changes by scheduling training sessions, as required.

~~3.9.7~~3.8.7 Coordinates the daily operations of CCP operations personnel, and its subcontractors.

~~3.9.8~~3.8.8 Works in conjunction with Responsible Division Leader/Designee ~~LTP Production Control Manager~~ to manage the control, movement, and tracking of waste containers through the CCP characterization process.

~~3.9.9~~3.8.9 Coordinates with the ~~EWMO TRU Waste Operations~~ Responsible Division Leader/Designee, ~~CCP Operations Manager~~ and CCP LANL Project Manager/Designee for any potential Noncompliance Tracking System-Reportable PAAA issues or any occurrence reports resulting from activities under the CCP Certified Program.

~~3.9.10~~3.8.10 Ensures operability and availability of CCP-provided characterization equipment.

~~3.9.11~~3.8.11 Ensures that CCP-provided equipment is maintained under a CCP approved Configuration Management Program.

~~3.9.12~~3.8.12 Ensures that new additions to and/or modifications made to CCP-provided facilities and/or equipment are submitted to Responsible Division ~~EWMO~~ Leader/Designee as soon as practicable and approvals are received prior to implementation.

~~3.9.13~~3.8.13 Ensures applicable manufacturers Safety Data Sheets (SDSs) for products brought to the facility by the CCP are provided to the Operations Center.

~~3.9.14~~3.8.14 ~~LTP Production Control Manager~~

3.9.15 Manages the control, movement, and tracking of containers through the CCP characterization process utilizing the CCP SPM-designated container selection list (AK Tracking Spreadsheet).

3.9.16 Ensures that containers are processed in conjunction with the CCP SPM or CCP VPM.

3.9.17 Ensures Material at Risk (MAR) inventory limits established by the Documented Safety Analysis (DSA) for each facility, are not exceeded.

3.9.18 Ensures that applicable container tracking information is maintained and kept current as required to LANL site requirements.

3.9.19 Generates and submits regular, periodic production reports.

3.10 LTP Shipping and Safe Storage Manager (SSS-PM)

3.10.1 Reviews and provides comments on the CCP Health and Safety Plan (HSP) for the purpose of ensuring that facility safety and security requirements are met.

3.10.2 Approves CCP health and safety-specific documents, including Integrated Work Documents (IWDs), as the Responsible Division Leader (RDL).

3.10.3 Ensures Un-reviewed Safety Question Determinations (USQD) are completed to ensure that CCP operations and activities are performed in accordance with the applicable Waste Characterization, Reduction, and Repackaging Facility (WCRRF), Radioassay and Nondestructive Testing (RANT), and Area G Safety Basis Documents.

3.10.4 Ensures modifications to CCP procedures, equipment, and facilities undergo EWMO review and USQD.

3.10.5 Ensures new CCP activities follow the LANL readiness review requirements.

3.10.6 Ensures facility modifications requested by CCP or LTP are performed in a timely manner in accordance with an adequately defined job request.

3.10.7 Provides temperature-controlled environment for staging waste containers prior to real-time radiography (RTR) when temperatures are below freezing.

3.10.8 Provides Lockout/Tagout (LO/TO) support for work performed on the CCP equipment.

3.10.9 Provides work control resources for corrective or preventive maintenance on LANS-owned utilities or equipment or on CCP-owned equipment, as requested.

3.10.10 Ensures USQD are completed to ensure that LTP operations and activities are performed in accordance with the applicable WCRRF, RANT, and Area G Safety Basis Documents.

3.10.11 Ensures facility-specific training requirements for CCP and LTP operations at TA-50 and TA-54 are defined, training plans are established and implemented, and information on training status is provided to CCP Training.

3.10.12 Ensures notification is made to CCP or LTP tenants of any new training requirements.

3.10.13 Provides Radiological Control Technician (RCT) support and dosimetry for characterization and transportation operations.

3.10.14 Provides Industrial Hygiene support for characterization and transportation operations.

3.10.15 Participates in Readiness Assessments or surveillances, as required.

3.10.16 Ensures Technical Safety Requirements (TSR) surveillances are conducted as required.

3.10.17 Ensures Fire Protection and other facility surveillances, are performed when required.

3.10.18 Provides support for LANS-owned equipment under a LANL-approved Configuration Management Program.

3.10.19 LANS personnel perform waste handling operations in support of CCP as assigned by LANS supervision.

3.10.20 LANS supervision coordinates administrative activities for LANL personnel including training and work hours assignments.

~~3.11 LANL LTP Source Custodian.~~

~~3.11.1 Maintains nuclear material source control in accordance with LANS requirements.~~

~~3.12~~3.9 LANL Environment, Safety, and Health (ES&H) ~~Industrial Hygiene~~ Support

~~3.12.1~~3.9.1 Responsible for workplace monitoring ~~to include~~, as applicable to the hazards associated with the work and workplace. ~~monitoring for volatile organic compounds, noise, cryogenics, beryllium, asbestos, and other hazardous materials.~~

~~3.12.2~~3.9.2 Responsible for ~~Occupational Safety and Health Administration (OSHA)~~ safety and health compliance reviews, for reviewing and approving IWDs, and for assuring compliance with the LANL safety and health requirements applicable to the CCP operations at LANL.

~~3.12.3~~3.9.3 Responsible for supporting compliance with the LANL Hazardous Waste Facility permit, and all other environmental compliance requirements.

~~3.12.4~~3.9.4 Responsible for supporting compliance with Waste Management Division requirements. And providing support for environmental compliance reviews and audits as a Responsible Division Leader resource.

3.10 LANS QPA Division Leader/Designee

3.10.1 Reports to the Quality & Performance Assurance Division Leader to maintain functional authority and independence from cost and scheduled considerations.

3.10.2 Functions as LANLs primary interface and point-of-contact for QA issues between LANS and CCP.

3.10.3 Provides copies of documentation of assessment activities (including audits and surveillances) to the CCP LANL Project Manager/Designee.

3.10.4 Provide oversight of activities performed in support of this interface agreement using LANS programs and procedures.

3.11 CCP Operations

3.11.1 Performs system start-up and calibration of characterization equipment at the Host site.

3.11.2 Operates CCP equipment in accordance with approved procedures including CCP-PO-005, *CCP Conduct of Operations*.

3.11.3 Performs safety walk-downs prior to operation.

3.11.4 Demonstrates CCP operations during DOE/CBFO certification/recertification audits.

3.12 Waste Certification Official (WCO)

3.12.1 Obtains approved Waste Stream Profile Form (WSPF) for containers to be certified.

3.12.2 Will document and certify that all TRU waste payload containers meet the requirements of the WAC, and submit the data to the WWIS/WDS for approval.

3.13 Transportation Certification Official (TCO)

3.13.1 Ensures CCP Transportation personnel are trained and qualified to perform WIPP-compliant CH and RH TRU waste packaging and loading operations at the Host site prior to starting work activities and are listed on the current LOQI.

3.13.2 Provides oversight of CCP Transportation personnel for payload and Overpack assembly and loading.

3.13.3 Builds payloads from certified containers and Overpacks provided by WCOs in WWIS/WDS.

3.13.4 Certifies payloads for transportation to and disposal at WIPP.

3.13.5 Builds shipments from approved payloads in WWIS/WDS.

4.0 INTERFACE

4.1 Initial Setup for Operations

4.1.1 The initial setup and startup of CCP characterization operations have been completed. In addition, the initial certification audit is complete and operations have commenced.

4.1.2 The Host site will provide infrastructure support as additional pieces of equipment or operations are added to the LANL scope.

4.2 Routine Operations

NOTE

Working shifts will be established by the CCP VPM and approved by the ~~EWMO FOD~~ Responsible Division Leader/Designee prior to implementation.

~~4.2.1 General Conditions of Operation~~

~~4.2.2~~4.2.1 The Host site has the overall responsibility for the management of the nuclear materials and operations of the nuclear facilities.

~~[A]~~4.2.2 Work performed by CCP personnel (including subcontractors) will be in compliance with Host site and CCP requirements.

~~[B]~~4.2.3 CCP personnel will STOP WORK (or Pause), as appropriate and will notify ~~Host site supervision~~ the FOD/Designee and the CCP VPM in the event of a safety concern or suspected environmental impact concern ~~(e.g., TSR violation, PAAA violation, breached container, emergency, injury)~~.

~~[C] CCP personnel will follow CCP-PO-005, *CCP Conduct of Operations*, for reporting employee concerns or abnormal conditions.~~

~~[D] Authorization Basis (AB) and Configuration Management~~

~~[D.1] The Host site has primary responsibility to ensure that CCP equipment and processes have been appropriately considered within the DOE-approved Host site DSA.~~

~~[D.2] The Host site shall provide to CCP, Host site generated AB documentation concerning CCP related activities and equipment, including USQDs, for CCP's review.~~

~~[D.3] CCP has primary responsibility to control operations and CCP-provided equipment configurations to ensure compliance with CCP and Host site procedures that protect the personnel, the public, and the environment.~~

~~[D.4] For CCP provided equipment, CCP will provide the documentation necessary for the Host site to perform the evaluation against its safety analysis. This documentation may include HSPs, hazard assessments, system descriptions, equipment drawings, or other information deemed necessary through mutual agreement between CCP and the Host site.~~

~~[D.5] For Host site-provided equipment, CCP will review operational and AB documentation, including USQDs, prior to assuming operation of the equipment to ensure the protection of personnel, the public, and the environment.~~

~~[D.6] All changes to equipment operated by CCP will be controlled by the Host site Work Control Program to ensure appropriate AB evaluations are conducted, and associated controls established.~~

~~[D.7] The Host site will submit all changes to AB requirements that affect CCP operations to CCP prior to implementation.~~

4.3 Work Standards

4.3.1 CCP VPM or Designee will perform the following activities to support daily operations:

[A] Ensure that work is performed in accordance with LANL requirements (e.g., LO/TO, Work Control, IWD) by trained and qualified personnel in accordance with approved work documents.

~~[B] Suspend work and notify the CCP LANL Project Manager/Designee and EWMO FOD/designee when appropriate, and others as needed.~~

~~[C]~~[B] In the event of abnormal condition or occurrence, support an investigation, as required.

~~[D]~~[C] Accept custody of waste containers delivered by LANL personnel and control approved waste characterization activities.

~~[E]~~[D] Disposition NCRs and ~~CARs~~ WIPP Forms as required, and communicate progress to the CCP LANL Project Manager/Designee and ~~LTP Project Director~~ Responsible Division Leader/Designee.

~~[F]~~[E] **IF** after Expert Analyst (EA) review, the NDA results indicate greater than 200 Fissile Gram Equivalent (FGE) (measured value plus two times the counting statistics) for a 55-gallon container, or greater than 325 FGE (measured value plus two times the counting statistics) for a standard waste boxes (SWB),
THEN notify the Operations Center and provide results.

~~[G]~~[F] Ensure that equipment calibration is performed on CCP operated equipment, in accordance with Section 4.23.

~~[H] Maintain and monitor the LOQIs to ensure that only qualified personnel perform waste characterization activities.~~

~~[I]~~[G] Attend pre-operations briefings performed for all on-site waste characterization personnel and attend the LANS Plan of the Day/Week briefings, as appropriate.

~~[J]~~[H] Ensure the safe operation and maintenance of all CCP instruments and equipment.

~~[K] STOP WORK and notify the Operations Center, QA, and LTP Project Director and CCP LANL Project Manager/Designee in the event of a safety concern (e.g., TSR violation, PAAA violation, breached container, emergency).~~

~~[L]~~[I] Ensure the safe operation of equipment by CCP personnel by performing periodic oversight.

[~~M~~][J] Ensure that CCP-provided equipment is properly maintained.

[~~N~~][K] Provide a copy of ~~material safety data sheets (MSDSs)~~ to the Operations Center, the CCP LANL Project Manager/Designee, ~~LTP Production Controls Manager~~Responsible Division Leader/Designee, ~~and the SSS PM,~~ and others as appropriate.

[~~N.1~~][K.1] When new chemicals are to be used, the ~~M~~SDS will be provided to ~~EWMO~~ FOD prior to ~~use~~ bringing the chemicals on site to ensure that the Chemical Inventory requirements are updated.

4.3.2 ~~SSS PM~~ Responsible Division Leader/Designee will ensure the following radiological control support is provided for CCP activities:

[A] Maintain radiological postings.

[B] Perform an initial and periodic radiation protection surveys on NDA and ~~NDE~~ RTR equipment and provide an approved survey report to the NDA Team Leader or ~~NDE~~ RTR Team Leader, and the VPM.

[C] Perform radiation protection surveys and monitoring as necessary.

[D] Provide thermoluminescent dosimeters (TLDs) for CCP personnel.

[E] Provide calibrated and source checked survey instrumentation as required.

[F] Issue and/or modify Radiation Work Permits (RWPs) to support CCP activities as needed.

4.3.3 CCP personnel will work under the ~~SSS PM~~LANL requirements for LO/TO.

4.3.4 CCP personnel will perform work in accordance with CCP-approved procedures for waste characterization and certification activities and LANS-approved work packages and procedures for non-waste characterization activities (e.g., equipment repairs). Both CCP-approved and LANS-approved processes will comply with LANL requirements.

4.3.5 CCP personnel will operate in accordance with CCP-PO-005, *CCP Conduct of Operations*.

4.3.6 CCP personnel with assistance from ~~LANS~~ LANL ~~industrial hygiene (IH)~~ Environment, Safety and Health (ES&H) personnel will develop IWDs or other applicable documents for all CCP activities performed at LANL in accordance with LANS policies and submit~~ted~~ to the ~~SSS PM~~ Responsible Division Leader/Designee ~~Team Lead~~ for approval.

4.4 Training

4.4.1 CCP ~~P~~personnel or Host site personnel who perform work under CCP procedures will be trained and qualified to WIPP requirements in accordance with CCP-QP-002, *CCP Training and Qualification Plan* and/or CCP-QP-040, *Support Training,* as applicable.~~applies to those activities that do not fall under the scope of CCP-QP-002. Additionally, CCP personnel assigned to LANL shall complete required LANL site, facility, and job-specific training. Both the WIPP (technical) training and LANL-specific training must be completed prior to the individual being qualified to perform work at LANL.~~

4.4.2 CCP and Host site personnel assigned to field operations must complete the Host site-specific training. The Responsible Division Leader/Designee will ensure the Host site-specific training documentation is sent to CCP Training.

4.4.3 Both the CCP training and Host site-specific training must be completed prior to the individual being assigned to perform independent work at the Host site.

4.4.4 Administrative work, such as BDR reviews requiring no access to the characterization activities or processes at the Host site, may be completed by personnel who have not completed the required Host site-specific training. Personnel who have not completed Host site-specific training will not be allowed unescorted access to the characterization activities.

~~4.4.2~~4.4.5 A LOQI will be ~~posted at locations established by the CCP VPM and~~ monitored daily by the CCP VPM to confirm CCP personnel ~~are in compliance with the training and qualification requirements in CCP-QP-002 and LANL~~ and Host site-~~specific training requirements.~~ personnel assigned to CCP are qualified.

~~[A] This documentation shall be available on the secure file transfer protocol (sftp) site for all personnel to review their qualification status.~~

~~4.4.3 The EWMO Training Coordinator or designee will provide LANL institutional and site-specific training requirements to CCP as established in the TA-54 Health and Safety Plan. This listing does not apply to the OSRP. For non-OSRP workers, this training includes the following as required by job task:~~

~~[A] HAZWOPER~~

~~[B] RadWorker II~~

~~[C] LANL General Employee Training (GET) (one time only)~~

~~[D] RCRA and Waste Management Training~~

~~[E] Facility-specific training~~

~~[F] Security training~~

~~4.4.4 The EWMO Training Coordinator or designee will notify the CCP SPM or designee whenever LANS training requirements have been modified.~~

~~4.4.5 OSRP personnel require LANL GET, RadWorker (if field work is performed), and Facility-specific training, as applicable.~~

~~4.4.6 LANL will ensure that site-specific training documentation is sent to CCP Training and notification is made to the SPM.~~

~~4.4.7 LANS Training records for CCP personnel shall be submitted to and maintained by CCP and EWMO training staff.~~

~~4.4.8 EWMO on-the-job training (OJT) instructor/evaluators shall comply with LANS training and qualification program.~~

~~4.4.9 CCP OJT instructors/evaluators shall comply with CCP's training and qualification program.~~

~~4.4.10 CCP and EWMO shall meet the LANL and CCP training records requirements regarding training records. A complete set of requirements documents and records shall be maintained by~~

~~EWMO (the responsible LANL organization) training staff for audit/assessment purposes.~~

4.5 Employee Monitoring

4.5.1 CCP will participate in the LANL radiological monitoring program as required by the radiological work permit process governing work performed.~~CCP personnel will participate in the LANL Bioassay Program, as required. Required CCP personnel will provide samples as requested under the program established by LANS and will submit the bioassay samples required to establish a baseline for activities.~~

~~4.5.2 LANL will analyze bioassay samples provided by CCP personnel within 60 days of their receipt.~~

~~4.5.3~~4.5.2 The CCP LANL Project Manager or CCP VPM will be notified if any bioassay sample provided by CCP personnel indicates that an uptake of material/waste may have occurred or if CCP personnel are required to resubmit bioassay samples as soon as is reasonably possible.

~~4.5.4~~4.5.3 LANS ~~Radiological Controls~~Radiation Protection personnel will perform routine surveys and monitoring for contamination and radiation as specified in LANS policies or procedures. The CCP LANL Project Manager/Designee or CCP VPM and appropriate LANL management personnel will be notified immediately upon the discovery of any loose surface contamination on any CCP-operated characterization equipment. Access to copies of routine survey results will be made available to CCP upon request.

~~4.5.5~~4.5.4 LANS will provide "upon request" the CCP LANL Project Manager/Designee or CCP VPM with the results of continuous or fixed air sample filter analysis as soon as the analysis is complete but not more than ~~within~~ 21 days following ~~of~~ the removal of the filter from the sampler head, in any monitored area routinely occupied by CCP personnel.

4.6 Container Management

4.6.1 LANS will provide waste ~~managed as TRU waste in 55-gallon drums, 85-gallon drums, and SWBs~~ to the characterization facilities, depending upon certification and characterization capabilities. All CH containers delivered for characterization will be approved by the CCP VPM as prescribed in CCP-TP-068, *CCP*

Standardized Container Management or CCP-TP-120, *CCP Container Management*.

4.6.2 ~~LANS~~ Responsible Division Leader/Designee is responsible for providing documented information to the CCP SPM/designee on any modification to the ~~drum or~~ container or contents of the container after the AK has been completed by CCP.

4.6.3 The CCP SPM/designee will review the documented information for modified containers and will notify the ~~LTP Production Controls Manager~~ Responsible Division Leader/Designee when the containers are approved for entrance into the characterization process.

4.6.4 LANS is responsible for movement of containers and implementing vehicle access controls, from characterization through shipment, including control of containers requiring remediation (prohibited items).

[A] Subcontractor support for container movement and management may be provided through CCP, provided personnel meet LANS training requirements.

[B] LANS and CCP will perform site container management in accordance with the applicable LANL and CCP procedures. This includes verification that the containers are included in the AK Tracking Spreadsheet for characterization by CCP and ensuring that the LANL operating record is kept up to date with container movements by LANS.

4.6.5 CCP is responsible for administratively tracking the containers throughout the CCP characterization processes. Personnel will perform container management in accordance with CCP-TP-068 or CCP-TP-120.

4.6.6 LANS will provide the necessary dose rate and surface contamination information to CCP to certify the containers for disposal, (e.g., survey results). All containers will have a Health Physics Materials Survey tag attached to the container prior to movement to CCP for characterization.

4.6.7 If a nonconformance is identified with a container, during the characterization or certification process, the container will be controlled in accordance with CCP-QP-005, *CCP TRU Nonconforming Item Reporting and Control.*

4.7 Deficiencies

4.7.1 If either LANS or CCP personnel, identify a nonconformance condition associated with a waste container during the characterization or certification process, personnel will initiate an NCR in accordance with CCP-QP-005.

4.7.2 The CCP LANL Project Manager/Designee will notify the ~~LTP Production Controls Manager~~ Responsible Division Leader/Designee of nonconformances by the distribution of NCRs. The ~~LTP Production Controls Manager~~ Responsible Division Leader/Designee may request any supporting documentation needed by LANS.

NOTE

In some cases, LANS will perform the work required to resolve deficiencies identified in CCP NCRs and will initiate internal documentation as required by the LANL program. However, the CCP NCRs will remain open and CCP NCR Hold Tags will remain on the affected containers until resolution of the NCR condition has been confirmed by CCP under its program. At that point, CCP will close the NCRs and remove the NCR Tags.

4.7.3 If the nonconformance can **NOT** be resolved by CCP (e.g., certain prohibited items or non-certifiable container types), CCP will coordinate with ~~LANS~~ the Responsible Division Leader/Designee to determine the actions to be taken.

4.7.4 CCP will notify the ~~SSS PM~~, ~~EWMO~~ FOD, ~~LTP Director~~Responsible Division Leader/Designee, and the CCP LANL Project Manager/Designee immediately of occurrence reports or potential PAAA issues resulting from the CCP scope of work.

4.7.5 The NWP QA will confirm appropriate closure of deficiencies.

4.8 Visual Examination (VE), Repackaging, and Prohibited Item Disposition (PID)

4.8.1 Glovebox operations will have oversight by CCP qualified VE Personnel, as required.

4.8.2 The CCP training programs for VE and VE technique will include OJT training. Personnel performing VE are instructed in the waste generating processes, typical packaging configurations, and waste material parameters expected to be in each Waste Matrix Code at LANL.

4.8.3 PID will be conducted on containers in accordance with approved Host site procedures with oversight by CCP VE trained personnel, as required.

4.9 Filter Inspection/Filter Changeout

4.9.1 LANL/CCP personnel will inspect the filters on containers as part of the container acceptance and will document whether the filter is a WIPP-approved filter. This information will be transmitted to the CCP VPM.

4.9.2 If filter change out is performed on containers that do not require repackaging, ~~T~~the~~is~~ operation will be documented and the information transmitted to the CCP VPM.

4.9.3 LANL/CCP personnel also inspect and verify filter models on containers as part of the FGA sampling process~~and any filter changeouts that occur immediately following FGA sampling~~.

4.10 Prescreen Real-Time Radiography (RTR)~~Nondestructive Examination (NDE)~~

4.10.1 CCP personnel will perform prescreening for ~~NDE~~ RTR to identify potentially certifiable containers that can be sent to ~~NDE~~RTR, as determined by LANL and agreed to by the CCP LANL Project Manager/designee. This information will be documented and provided to the ~~LTP Production Controls~~ Responsible Division Leader/Designee.

4.10.2 Using funding provided by LANS, CCP will perform additional pre-screening as requested by LANS to support LANS waste characterization activities (e.g., low-level waste and mixed low-level waste).

4.11 Prescreen Nondestructive Assay (NDA)

4.11.1 CCP personnel will perform prescreening for NDA as determined by LANL and agreed to by the CCP LANL Project Manager/designee. This information will be documented and

provided to the Responsible Division Leader/Designee~~LTP Production Controls Manager~~.

[A] ~~Drums~~ Containers that are less than 100 nanocuries per gram (nCi/g) will be returned to the Host site for disposition. BDR information on these ~~drums~~ containers will be provided as part of the process of returning the ~~drums~~ container to LANL.

4.12 Real-Time Radiography ~~Nondestructive Examination~~ (~~NDE~~RTR)

4.12.1 ~~NDE~~ RTR will be performed by personnel trained under the CCP Certified Program.

4.12.2 Containers found with prohibited items or conditions requiring remediation (e.g., unvented container liner, liquids not meeting permit requirements) will be flagged, an NCR initiated, and staged for remediation at a later date.

[A] ~~NDE~~ RTR Operators will notify the Operations Center if containers are found to contain compressed gas cylinders.

4.12.3 If a container is found during ~~NDE~~ RTR that is suspected to contain a classified shape, it will be segregated and handled in accordance with LANL procedures.

[A] The information generated during the ~~NDE~~ RTR of the ~~drum~~ container will be subject to control of potentially classified information. This media will be redacted by LANS, as possible, to remove the potentially classified portion and the revised media will be returned to CCP to complete the associated BDR.

4.12.4 CCP ~~NDE~~ RTR Operators may provide additional interpretation of scans to support other LANS repackaging activities ~~as~~ and waste characterization/re-characterizations determined by LANS and agreed to by the CCP LANL Project Manager/designee.

4.13 Nondestructive Assay (NDA)

4.13.1 NDA will be conducted using certified equipment with personnel trained under the CCP Certified Program.

4.13.2 **IF** assay results are greater than facility AB limits for Plutonium Equivalent Curies (PE-Ci),

THEN NDA personnel will immediately notify the Operations Center, the CCP LANL Project Manager/Designee, ~~and~~ the CCP VPM, and the Responsible Division Leader/Designee.

~~[A] The limit for individual 55-gallon drums of debris waste is 80 PE-Ci.~~

~~[B] The limit for 55-gallon drums of solidified waste is 1,200 PE-Ci.~~

~~[C] The limit for overpack containers, SWBs, or metal waste boxes is 1,100 PE-Ci.~~

4.13.3 **IF** assay results are greater than the following criticality spacing limitations,
THEN the EA will notify the Operations Center, the CCP LANL Project Manager/Designee and the CCP VPM.

[A] Individual 55-gallon drums or Pipe Overpack Container (POC) of waste exceeding 200 FGE (measured value).

[B] Containers found to exceed the calibration range of the NDA machine.

[C] Individual SWBs, TDOPs or SLB2s of waste exceeding 325 FGE (measured value).

[D] Criticality Control Overpacks (CCO) of waste exceeding 380 FGE (measured value).

4.13.4 If assay results indicate that a container exceeds the Waste Acceptance Criteria (WAC) limits for plutonium equivalent activity, criteria, CCP personnel will issue an NCR in accordance with CCP-QP-005.

4.13.5 For any containers that exceed the shipping limit for FGE, an NCR will be generated in accordance with CCP-QP-005 to return the ~~drums~~ containers to LANL for repackaging.

4.13.6 For any containers that are less than 100 nCi/g, an NCR will be generated in accordance with CCP-QP-005 to return the ~~drums~~ containers to LANS.

4.13.7 LANS will provide/refill the ~~dewar~~ cylinder required for the liquid nitrogen for NDA.

4.14 Source Control

4.14.1 LANS will be responsible for NDA sources used for both calibration (reference sources) and for the DOE/CBFO PDP. Responsibilities include inventory control, storage, inspection and handling. Responsibilities include ensuring radiological control support associated with sources is provided, maintaining the Radioactive Materials Area (RMA) postings and periodic surveys, and performing a semi-annual leak check on the reference sources.

4.14.2 LANS will provide support for the participation in the NDA PDP. This support includes training PDP coordinators, preparation of the test matrix ~~drums~~containers, delivery of the ~~drums~~ containers to the NDA equipment, and responsibility for PDP source control. LANS support will be coordinated by the Responsible Division Leader/Designee~~LTP Production Control Manager~~.

4.14.3 LANS, as custodian of the sources, will provide to CCP the necessary reference sources for calibration in accordance with CCP NDA calibration procedures.

4.15 Waste Sampling and Analysis Methods

4.15.1 If the WIPP Permittees determine that additional characterization is necessary using chemical sampling and analysis, the Permittees shall direct generator/storage site to provide the Permittees with the following documentation:

- Sampling and analysis plan
- U.S. Environmental Protection Agency (EPA) SW-846 test method(s), or functionally equivalent test method(s), to be used
- Identification of the laboratory(ies) that will be performing the test(s)

4.15.2 Upon the Permittees written approval of the sampling and analysis plan, the generator/storage site shall implement the sampling and analysis plan.

4.16 Gas Generation Testing (GGT)

4.16.1 CCP will perform ~~Gas Generation Test (~~GGT~~)~~ sampling and analysis using GGT canisters in accordance with CCP-TP-083,

CCP Gas Generation Testing, and CCP-PO-016, *CCP Gas Generation Testing Quality Assurance Project Plan.*

~~4.16.2 CCP will be responsible for maintenance and repairs of the GGT canisters and instrumentation per CCP-TP-089, *CCP Mobile Gas Generation Testing Sampling System (MGSS) Sampling Operation.*~~

4.17 Flammable Gas Analysis (FGA)

4.17.1 FGA is for transportation only and will be performed using approved DOE/WIPP procedures by personnel trained under the CCP Qualification Program. This includes OSRP containers, as required.

4.17.2 The Operations Center, the CCP LANL Project Manager/Designee, and the CCP VPM will be notified if after completion of the analysis, the containers exceed the facility designated limits. ~~following:~~

~~[A] >7,000 ppm flammable volatile organic compounds (VOCs)~~

~~[B] >6.4% Hydrogen~~

~~[C] >16,000 ppm Methane~~

4.18 Acceptable Knowledge (AK)

4.18.1 CCP records personnel in Carlsbad will maintain the auditable AK record necessary to support the AK Summary Report in accordance with CCP-PO-001, *CCP Transuranic Waste Characterization Quality Assurance Project Plan*, and CCP-QP-008, *CCP Records Management*.

4.18.2 CCP AK personnel collect, compile, and review AK documentation ~~will perform and document the AK collection, reporting, and confirmation of AK~~ in accordance with CCP-TP-005, ~~*CCP Acceptable Knowledge Documentation*~~ and/or DOE/WIPP-02-3214, *Remote-Handled TRU Waste Characterization Program Implementation Plan* (WCPIP). ~~CCP shall submit the AK Summary Report for LTP Production Controls Manager review.~~

[A] Host site/generator personnel assist CCP AK personnel with AK collection.

[B] CCP AK personnel and host site/generator personnel will cooperate fully with each other in the sharing and exchange of any and all AK information that is collected for or incorporated into IWMDL or AK Summary Reports.

[C] The Responsible Division Leader/Designee will provide assistance by coordinating potential interviewees for CCP. The Responsible Division Leader/Designee will ensure Competent Host Site/Generator Personnel (CP) are available to serve as an intermediary and an active listener to support effective generator questioning.

4.18.3 CCP AK personnel and Host site/generator personnel develop an IWMDL that includes facility processes, plans, and procedures, waste profile forms, and Waste Compliance and Tracking System records that control the following waste management activities as applicable:

- Waste generating activities
- Waste retrieval activities
- Waste packaging/repackaging
- Waste treatment/processing (e.g., neutralization, deactivation, and solidification/immobilization
- Waste inspection, testing, and characterization
- Decontamination and Decommissioning operations
- Any other activity that changes the physical, chemical, or radiological properties of waste to be characterized by CCP

4.18.4 The AKE develops the new or revised IWMDL in accordance with CCP-TP-005 using the existing body of AK documentation.

[A] The Responsible Division Leader/Designee ensures CP are assigned to review the new or revised IWMDL for accuracy and completeness and provide written comments as appropriate.

[B] The AKE and CP resolve comments and questions.

[C] CCP posts the new revised IWMDL on the CCP secure file transfer protocol (sftp) site.

NOTE

This note applies to step 4.18.5. The activities of step 4.18.5 may be initiated as necessary by the AKE for existing waste streams, new waste streams, or during AK revisions/updates.

~~4.18.4~~4.18.5 AKA are performed in accordance with CCP-TP-005.

[A] SPM provides Responsible Division Leader/Designee with the AKA results.

[B] Responsible Division Leader/Designee distributes results of the AKA to designated CPs for review and comment.

[C] AKE resolves comments with Responsible Division Leader/Designee and CPs.

[D] Responsible Division Leader/Designee concurs with final AKA in writing.

~~4.18.5~~4.18.6 CCP submits new or revised AK Summary Reports to the Responsible Division Leader/Designee for review and concurrence.

[A] The Responsible Division Leader ensures CP review the AK Summary Report for accuracy and completeness providing comments in accordance with CCP-QP-010.

~~4.18.6~~4.18.7 A Host site/generator CP attends a briefing on new or revised AK Summary Reports.

~~4.18.7~~4.18.8 Responsible Division Leader/Designee notifies the SPM and AKE in writing of any new revised waste management activities that would necessitate a change to the IWMDL.

~~4.18.8~~4.18.9 The SPM and AKE evaluate new or revised waste management activities and determine if revision to the IWMDL and/or AK Summary Report is needed.

~~4.18.9~~4.18.10 The Host site will not provide any waste container to CCP for characterization until the AKE has received the latest version of the work document (including field changes, other immediate procedure changes, Timely Orders/Standing Order,

Operator Aids, etc.) used to generate, package, and/or repackage the container.

[A] The work document(s) provided to the AKE will contain the following information at a minimum:

- Identification (including revision) of the work document(s) used to generate the container
- Type of activity (e.g., packaging/repackaging only, remediation, treatment)
- Amount (estimated) and type (if known) of liquids
- Type and quantity (estimated) of absorbents used
- Type and quantity (estimated) of neutralization agents used
- Any unexpected conditions or reactions encountered
- General description of waste items
- Packaging configuration (e.g., 55-gallon drum with 20 mil liner bag)
- Filter data including model and quantity used
- Parent container identification

~~4.18.10~~4.18.11 The AKE will ensure they have obtained and reviewed the correct version of IWMDL documentation used to generate/manage a container before adding it to the AK Tracking Spread Sheet.

~~4.18.11~~4.18.12 At a minimum of once per calendar quarter, Responsible Division Leader/Designee will review the current IWMDL and provide written assurance to the CCP SPM that the list is up to date OR provide necessary documentation to revise the list.

~~4.18.12 As determined by the LANS LTP Director, the assigned LANS staff will provide written comments to be dispositioned by CCP~~

~~before CCP document approval. Disposition of comments on the AK Summary Report is tracked in accordance with CCP-QP-010, *CCP Document Preparation, Approval, and Control.*~~

~~4.18.13 NCRs that identify possible changes to the AK of a waste stream (Trend Code L) require evaluation by the CCP SPM to determine if an AK Expert investigation is warranted.~~

~~4.18.14 Containers less than 100 nCi/g will be moved from the AK Tracking Spreadsheet to a separate tab prior to closure of the NCR.~~

4.19 Off-Site Source Recovery Program

4.19.1 OSRP VE and Radiological Characterization will be conducted using certified equipment with personnel trained under the CCP Certified Program.

4.19.2 The OSRP uses a separate procedure for VE and packaging. In addition, it uses AK documentation in combination with calculations, in lieu of NDA.

4.19.3 Prior data for Off-Site Source Recovery (OSR) containers generated under the LANL Certified Program will be evaluated for acceptability into the CCP Certified Program.

[A] The previous BDRs will be reviewed and validated at the CCP Project Office prior to acceptance into the program.

[B] If the data validators at the CCP Project Office are unable to verify the data, the BDRs will not be accepted and will require re-generation under the CCP program.

~~[C] OSRP containers are weighed and inspected prior to being added to the AK Tracking Spreadsheet.~~

4.20 CCP Project Office Certification Activities

4.20.1 CCP Project Office certification activities consist of project-level review of BDRs, lot evaluations, data validation, and WIPP Waste Information System/Waste Data System (WWIS/WDS) data entry. CCP Project Office certification activities will be conducted using personnel trained under the CCP Certified Program.

4.20.2 Data validators are responsible for completing the required checklists, resolving comments, and ensuring records are complete.

4.20.3 WWIS/WDS personnel will ensure information is entered into WWIS in accordance with CCP-TP-030, *CCP CH TRU Waste Certification and WWIS/WDS Data Entry,* and CCP-TP-530, *CCP RH TRU Waste Certification and WWIS/WDS Data Entry.*

4.20.4 The Waste Certification Official (WCO) will certify and transmit characterization and certification data using the WWIS/WDS and approved procedures.

4.20.5 The WCO will document and certify that all TRU waste payload containers prepared from the certified process for WIPP meet all of the requirements of DOE/WIPP-02-3214, CCP-PO-001, CCP-PO-002, *CCP Transuranic Waste Certification Plan,* and CCP-PO-003, *CCP Transuranic Authorized Methods For Payload Control (CCP CH-TRAMPAC)* or CCP-PO-505, *CCP Remote-Handled Transuranic Waste Authorized Methods for Payload Control (CCP RH-TRAMPAC).*

4.20.6 The WCO will transmit information to the CCP Records in accordance with CCP-TP-030 and CCP-TP-530.

4.20.7 The WCO will provide the Transportation Certification Official (TCO) with all certification information necessary to certify the payload for transportation.

4.21 Transportation to WIPP

4.21.1 Transportation certification, preparation of the shipment of certified packages (e.g., Transuranic Package Transporter-II [TRUPACT-II], TRUPACT-III, HalfPact, or RH 72-B Cask), and shipment of the waste will be conducted using personnel trained under the CCP Certified Program.

4.21.2 CCP will provide TRUPACT-II, HalfPACT, CH, and RH loading training to LANL employees, as required, to maintain certifications required for transportation activities.

4.21.3 LANL will provide manifesting, marking, labeling and placarding of the shipments in accordance with Title 40 CFR, *Protection of Environment*, Title 49 CFR, *Transportation* requirements, and site-specific procedures.

4.21.4 LANL will verify and ensure that ~~drums~~ containers being shipped to Radioassay and Nondestructive Testing (RANT) or the loading area do not exceed AB MAR inventory.

4.21.5 LANL will track MAR inventory at RANT onsite, RANT facility, or other loadout facility.

4.21.6 The TCO will inspect the containers and verify that the filter installed on the containers to be shipped meet WIPP requirements and match information submitted during waste certification.

4.21.7 Waste will be loaded and prepared for transport to WIPP in accordance with DOE-approved operating procedures.

4.21.8 The TCO will provide documentation to the Responsible Division Leader/Designee responsible for ~~LTP Production Coordination Manager~~ certifying the waste for shipment in accordance with CCP procedures.

4.22 Remote-Handled (RH) Waste Program

4.22.1 Specific roles and responsibilities will be established for personnel under the CCP RH Program.

4.23 Measurement and Test Equipment (M&TE)

4.23.1 The CCP M&TE Custodian will provide recall notification for CCP M&TE that requires calibration to the CCP LANL Project Manager/Designee. M&TE requiring calibration will include such things as weight scales, infrared thermometers, temperature data-loggers, electronic calibrators, digital readouts, and pressure transducers.

4.23.2 LANS will provide National Institute of Science and Technology ~~(NIST)~~-traceable calibration services for specified M&TE. LANS will maintain records on M&TE calibration in accordance with its Qualified Suppliers List (QSL)-accepted program. LANS will provide copies of the Certificates of Calibration for these items of M&TE to the CCP VPM and the CCP M&TE Custodian via the CCP LANL Project Manager/Designee prior to issuing M&TE to CCP for use.

4.23.3 LANS will notify the CCP M&TE custodian when M&TE are added, deleted, found out-of-tolerance/defective or failed calibration by the Host site.

4.24 Procedures

4.24.1 The Responsible Division Leader/Designee will send LANL procedures and waste processing plans that can impact the CCP characterization process as well as requirements specified in DOE/WIPP 02-3122, Transuranic Waste Acceptance Criteria For The Waste Isolation Pilot Plant (WIPP-WAC); Contact-Handled Transuranic Waste Authorized Methods for Payload Control (CH-TRAMPAC); Waste Isolation Pilot Plant Hazardous Waste Facility Permit, Waste Analysis Plan (WIPP-WAP)., to the LANL CCP Project Manager/Designee for review by appropriate CCP SMEs.

[A] As warranted, the LANL CCP Project Manager/Designee will provide written comments from the CCP review of LANL documents to the Responsible Division Leader/Designee for resolution.

[B] Responsible Division Leader/Designee will confirm with the LANL CCP Project Manager/Designee that CCP written comments are resolved and that CCP approves the document prior to proceeding with operations under the scope of the document being reviewed.

[C] LANS, at its discretion, may request objective evidence to support the competency of NWP reviewers.

4.24.2 Editorial or minor changes may be made without the same level of review and approval as the original document as defined in CCP-QP-010.

4.24.3 New Technical Operating Procedures (procedures that operate equipment) developed by CCP scheduled to be used at the Host

site, shall be evaluated by the Host ~~Facility~~ site Responsible Division Leader/Designee ~~LTP Production Control Manager~~ to determine if the procedure shall be added to the Host ~~Facility~~ site review lists defined in step 4.24.5~~4.23.4~~.

4.24.4 All characterization procedures, which physically manipulates the waste (e.g., VE) or the waste container (e.g., ~~NDE~~ RTR or NDA) and all revisions to these procedures, will be provided to the ~~EWMO FOD, SSS PM, LTP Project Director~~Responsible Division Leader/Designee, by the CCP LANL Project Manager/Designee for review (e.g., USQD, AK evaluation, Health & Safety Review and Implementation), before approval by DOE/CBFO and implementation by CCP.

4.24.5 The Responsible Division Leader/Designee ~~LTP Project Director, EWMO FOD/designee, CCP LANL Project Manager/Designee~~ will ~~review or~~ designate the appropriate reviews of the ~~procedures~~ documents listed below (which do not meet the criteria of step 4.24.2~~4.23.1~~ and do not affect the AB) and forward written comments to CCP Document Control in accordance with CCP-QP-010 ~~or LANL Document Control in accordance with EP-DIR-SOP-4001, *Document Control,*~~ for resolution. For operational procedures that CCP is not currently operating to, the Responsible Division Leader/Designee may waive the review until CCP operations commence on site. When CCP operations return to the site, the Responsible Division Leader/Designee will be provided all procedures listed below for review.

CCP ~~Procedures~~Documents:

- CCP LANL AK Summary Reports
- CCP LANL WSPFs
- CCP Interface Waste Management Document Lists
- CCP AKA
- CCP-CM-003, *CCP High Efficiency Neutron Counter (HENC-01) (Equipment #NDA-HENC-01) Equipment Description*

- CCP-CM-005, *CCP High-Efficiency Neutron Counter (HENC) (Equipment #NDA-HENC-03) Equipment Description*
- CCP-CM-018, *CCP Real-Time Radiography MCS Unit #3 LANL Unit #2 (RTR #2) (Equipment #NDE-RTR-03/ LANL-RTR-02) Equipment Description*
- CCP-CM-024, *CCP High Efficiency Neutron Counter (HENC-02) (Equipment #NDA-HENC-02) Equipment Description*
- CCP-CM-028, *CCP Real-Time Radiography LANL Unit #1 (Equipment #LANL-RTR-01)* Equipment Description
- CCP-CM-029, *CCP High Energy Real-Time Radiography System HE-RTR*
- CCP-CM-032, *CCP Super High-Efficiency Neutron Counter (SuperHENC) Equipment Description*
- ~~CCP-HSP-014, *Health and Safety Program Implementation for CCP*~~
- CCP-PO-016, *CCP Gas Generation Testing Quality Assurance Project Plan*
- CCP-TP-053, *CCP Standard Real-Time Radiography (RTR) Inspection Procedure*
- CCP-TP-054, *CCP Adjustable Center of Gravity Lift Fixture Preoperational Checks and Shutdown*
- CCP-TP-055, *CCP Varian Porta-Test Leak Detector Operations*
- CCP-TP-059, *CCP Operating the Super High Efficiency Neutron Counter (~~Super~~HENC) Using NDA 2000*
- CCP-TP-063, *CCP Operating the High Efficiency Neutron Counter Using NDA 2000*

- CCP-TP-064, *CCP Calibrating the High Efficiency Neutron Counter and the Super High Efficiency Neutron Counter Using NDA 2000*
- CCP-TP-066, *CCP Radiography Screening Procedure for Prohibited Items*
- CCP-TP-068, *CCP Standardized Container Management*
- CCP-TP-069, *CCP Sealed Source Visual Examination and Packaging*
- CCP-TP-076, *CCP Operating the Mobile ISOCS Large Container Counter Using NDA 2000*
- CCP-TP-077, *CCP Calibrating the Mobile ISOCS Large Container Counter Using NDA 2000*
- CCP-TP-078, *CCP LANL Info Scan Radiography Procedure*
- CCP-TP-082, *CCP Waste Container Filter Vent Maintenance and Operation*
- CCP-TP-083, *CCP Gas Generation Testing*
- CCP-TP-086, *CCP CH Packaging Payload Assembly*
- CCP-TP-101, *CCP Off-Site Source Recovery Project Sealed Source Radiological Characterization*
- CCP-TP-103, *CCP Data Reviewing, Validating, and Reporting Procedure for the NDA Counters at LANL Using NDA 2000*
- CCP-TP-107, *CCP Operating the High Efficiency Neutron Counter #3 (HENC #3) Using NDA 2000*
- CCP-TP-108, *CCP Calibrating the High Efficiency Neutron Counter #3 (HENC #3) Using NDA 2000*
- CCP-TP-113, *CCP Standard Contact-Handled Waste Visual Examination*

- CCP-TP-120, *CCP Container Management*
- CCP-TP-121, *CCP RTR #1 Operating Procedure*
- CCP-TP-122, *CCP RTR #2 Operating Procedure*
- CCP-TP-198, *CCP HE-RTR Operating Procedure*

~~LANL Procedures:~~

- ~~TA-54, *Area G Security Plan*, May 2008~~

NOTE

This note applies to step 4.24.6. Examples of cognizant personnel may include, but is not limited to SMEs for the following as applicable to the document reviewed:

- Waste generating/packaging/repackaging processes
- Chemical and physical characteristics of waste streams
- Chemical compatibilities
- Radiological properties of waste streams
- Treatment permits
- Nuclear Safety
- Environmental compliance
- Facility operations

4.24.6 Upon receipt of a document listed in step 4.24.5, the Responsible Division Leader/Designee will ensure the document is reviewed by cognizant personnel responsible for the waste management activities relevant to the scope of the document.

4.24.7 As warranted, the Responsible Division Leader/Designee will provide written comments to CCP using Document Review Record in accordance with CCP-QP-010.

4.24.8 CCP, at its discretion, may request objective evidence to support the competency of Host site/generator reviewers.

4.24.9 The LANL CCP Project Manager/Designee will confirm with the Responsible Division Leader/Designee that LANL written comments are resolved and LANL concurrence is provided prior to proceeding with CCP operations under the scope of the document being reviewed.

~~4.24.10 The LANS LTP Director/Waste Division Leader and the EWMO FOD will confirm that written comments from LANS are resolved prior to proceeding with operations.~~

4.25 Documents/Records

4.25.1 All AK documents generated at LANL must be reviewed prior to release by an Authorized Derivative Classifier (ADC) as detailed in ADC guidance documents. ~~LANS' governing document is LIR 406-00-01, *General Security*.~~

4.25.2 In addition, any document created by CCP or LANS that is intended for public release must be reviewed and processed for Unclassified Controlled Nuclear Information (UCNI) review and Public Release review prior to release. ~~LANS' governing document is Attachment 10 of LIR 406-00-01, *UCNI and* DOE M 475.1-1 *for Public Release*.~~

4.25.3 Documents listed in steps 4.25.4 and 4.25.5, which are provided from one organization to the other as information copies, may be transmitted via memo, fax, e-mail, or formal correspondence.

4.25.4 Documents to be provided by LANS after completion of ADC review to CCP personnel include copies of the following:

[A] Existing AK documentation including, but not limited to: source documents, spreadsheets, NCR/~~CAR~~, VE, PID information, and characterization raw data.

[B] Changes to ~~drum~~ container data information after AK has been collected and/or reconciled.

[C] Any documentation required for CCP to perform its scope of work, including correspondence pertaining to characterization activities.

[D] Radiological dose rate and surface contamination results on waste drums as needed to support WDS data entry.

[E] Copies of calibration certifications for M&TE used by CCP.

4.25.5 Documents to be provided by CCP (No ADC review required) to LANL personnel, as applicable, include copies of the following:

[A] Completed BDRs for all processes.

[B] Copy of WSPF for concurrence.

[C] Copy of AK Summary Reports for concurrence.

[D] Lot Evaluation documentation.

[E] Completion of CCP Training/LOQI updates.

[F] AK Tracking Spreadsheet.

[G] NCRs and ~~CARs~~ WIPP Forms generated.

[H] Other reports generated to support a certified program.

[I] Daily Production Reports.

[J] CCP Interface Waste Management Document Lists.

[K] CCP AKA.

4.25.6 Documents that are generated at LANL during the implementation of the TRU waste characterization and disposal at WIPP ~~LTP at LANL~~ will be processed through the CCP Records process in accordance with CCP-QP-008. After completion of all activities, these records will be turned over to LANL ~~and~~ at the end of the project.

4.26 Quality Assurance (QA)

4.26.1 All quality affecting work performed in the completion of this waste characterization, certification, and transportation scope will be in compliance with applicable DOE/CBFO-certified CCP procedures.

4.26.2 CCP will conduct periodic QA surveillances to assess compliance with applicable WIPP requirements.

4.26.3 The Host site will conduct surveillances to assess compliance with applicable procedures.

4.27 Procurement

4.27.1 Qualified LANS personnel may procure, inspect, and perform receipt inspection of U.S. Department of Transportation (DOT) Type 7A ~~drums~~containers, filters, gases and various non-quality

affecting items for certified CCP operations in accordance with LANL procurement requirements.

4.27.2 LANS personnel will perform procurement activities in accordance with its QSL-accepted program.

4.27.3 CCP may procure, inspect, and perform receipt inspection of quality-affecting items (e.g., DOE Type 7A ~~drums~~containers, filters, and gases) and various nonquality affecting items for certified operation in accordance with CCP procurement requirements. Quality-related procurements ordered by CCP require a CCP receipt inspection only; they DO **NOT** require a LANL QA receipt inspection. Documentation of these inspections will be made available to the LANS QPA Division Leader/Designee~~EWMO QA Manager~~ upon request.

4.27.4 All procurements for commodities (e g., Pipe Overpack, and SWB) procured through CBFO's Central Procurement Program (CPP) will require LANL receipt inspection. CPP acceptance is evidenced by the approved data package provided with each shipment.

4.27.5 All HAZMAT packaging procured or leased by CCP or CBFO shall be in accordance with written specification and receipt inspection plans that have been reviewed and approved by LANL Operations Support Packaging and Transportation (OS-PT). These specifications and plans will be provided by OS-PT with the procurement request documents that are provided to CCP or CBFO.

~~4.28 Oversight~~

~~**NOTE**~~

~~LANS retains the responsibility for proper disposal as the waste owner and generator. Accordingly, this section defines the level of oversight of CCP characterization activities performed by LANS.~~

~~4.28.1 LANS will conduct periodic surveillances and/or audits to ensure work is conducted safely in accordance with CCP and LANS procedures. These surveillances and/or audits will be scheduled and conducted in accordance with LANL QA procedures.~~

~~4.28.2 The EWMO QA Manager will provide copies of the LANS surveillances and/or audit reports to the CCP LANL Project Manager/Designee.~~

~~4.28.3 The CCP LANL Project Manager/Designee and QA will review the LANL audit and surveillance reports for any findings or other deficiencies against the CCP scope of work.~~

~~4.28.4 If required, CCP will prepare and process CARs in accordance with WP 15-GM1002, *Issues Management Processing of WIPP Forms*, for deficiencies identified during the review.~~

~~4.28.5 The CCP LANL Project Manager/Designee will provide the LTP Director with CCP actions to correct identified deficiencies.~~

~~4.28.6 The LTP Director and EWMO FOD will concur upon or approve of corrective actions taken by CCP in response to LANL surveillances and/or audits.~~

~~4.29~~4.28 Notification

~~4.29.1~~4.28.1 The Host site has primary responsibility to notify CCP when there are changes in the Host site facilities used by CCP for characterization activities or changes that may impact operations.

~~4.29.2~~4.28.2 The Host site has primary responsibility to notify CCP when there are changes to policies, processes, or procedures that may affect CCP characterization activities or operations.

~~4.29.3~~4.28.3 The Host site has primary responsibility to notify CCP when repairs or modifications are made to transportation trailers or packaging equipment (TRUPACT-II, HalfPACTs, etc.). CCP will then notify the appropriate cognizant engineer at the WIPP site. The cognizant engineer will verify the modification/repair.

~~4.29.4~~4.28.4 The Host site has primary responsibility to notify CCP of required notifications of various container conditions or changes to the notification requirements.

~~4.29.5~~4.28.5 CCP has primary responsibility to ensure changes to equipment are in accordance with CCP-CM-001, *CCP Equipment Change Authorization and Documentation*.

~~4.29.6~~4.28.6 CCP has primary responsibility to notify the Host site when there are configuration changes to CCP-provided equipment.

~~4.29.7~~4.28.7 CCP has responsibility to notify the Operations Center of various container conditions (e.g., FGE) as identified in the previous sections.

4.304.29 Occurrence Reporting and Processing System (ORPS) and Price-Anderson Amendments Act (PAAA)

4.30.14.29.1 Both LANS and CCP maintain the responsibility for reporting potential PAAA issues resulting from waste certification or safe operation of characterization activities (e.g., Technical Safety Requirements, Radiation Safety, Industrial Safety, Industrial Hygiene, Maintenance, Lockout/Tagout, Conduct of Operations) of TRU waste by CCP at LANL. This includes filing any Occurrence Reporting and Processing System (ORPS) reports resulting from the characterization activities of TRU waste by CCP.

4.30.24.29.2 Both LANS and CCP shall invite the other to participate in the investigation of any waste characterization event that results in an ORPS or PAAA report.

4.30.34.29.3 Both LANS and CCP shall support and participate in investigations when CCP characterization activities result in an ORPS or PAAA report.

4.30.44.29.4 Within CCP, the NWP Compliance Coordinator serves as the PAAA point-of-contact. Within LANS, the PAAA Coordinator for ~~EWMO Division~~ Quality and Performance Assurance Division Office (QPA-DO) acts as the PAAA point-of-contact, with roles and responsibilities in accordance with the Host site program.

4.30.54.29.5 In coordination with the CCP LANL Project Manager/Designee and the CCP VPM, the NWP Compliance Coordinator is responsible for notifying the LANS PAAA point-of-contact for any occurrences or conditions related to CCP characterization operations that are an actual or potential noncompliance to the ~~Area G, RANT or WCRRF~~ applicable AB, and for any occurrences or conditions that are an actual or potential noncompliance to the CCP Certified Program procedures, implementation of the QA Program (10 CFR Part 830, *Nuclear Safety Management*) or the Radiation Protection Program (10 CFR Part 835, *Occupational Radiation Protection*) impacting or potentially impacting nuclear safety, or implementation of the Worker Safety and Health Plan (10 CFR Part 851) impacting or potentially impacting personnel safety.

[A] Both parties are responsible for ensuring compliance with their respective programs.

~~4.30.6~~4.29.6 The LANS PAAA point-of-contact will notify the NWP Compliance Coordinator of any PAAA noncompliance with the CCP Certified Program. The CCP LANL Project Manager/Designee is responsible for ensuring that deficiencies identified within the CCP Program are appropriately documented and forwarded to the NWP Compliance Coordinator.

4.30 Authorization Basis (AB) and Configuration Management

4.30.1 The Host site has primary responsibility to ensure that CCP equipment and processes have been appropriately considered within the DOE-approved Host site DSA.

[A] The Host site shall provide to CCP, Host site generated AB documentation concerning CCP related activities and equipment, including USQDs, for CCP's review.

[B] CCP has primary responsibility to control operations and CCP-provided equipment configurations to ensure compliance with CCP and Host site procedures that protect the personnel, the public, and the environment.

[C] For CCP provided equipment, CCP will provide the documentation necessary for the Host site to perform the evaluation against its safety analysis. This documentation may include HSPs, hazard assessments, system descriptions, equipment drawings, or other information deemed necessary through mutual agreement between CCP and the Host site.

[D] For Host site-provided equipment, CCP will review operational and AB documentation, including USQDs, prior to assuming operation of the equipment to ensure the protection of personnel, the public, and the environment.

[E] All changes to equipment operated by CCP will be controlled by the Host site Work Control Program to ensure appropriate AB evaluations are conducted, and associated controls established.

[F] The Host site will make available all changes to AB requirements that affect CCP operations to CCP prior to implementation.

4.31 10 Code of Federal Regulation (CFR) Part 851, *Worker Safety and Health Program*

4.31.1 The requirements of 10 Code of Federal Regulation (CFR) Part 851, *Worker Safety and Health Program* are incorporated at LANL by PD103, *Worker Safety and Health Program*. All work performed by CCP at LANL will be in accordance with PD103, *Worker Safety and Health Program*.

5.0 RECORDS

5.1 Records are generated during the implementation of procedures referenced in this Interface Document. These records are maintained as QA records in accordance with CCP-QP-008. No additional records are generated as a result of this Interface Document.

6.0 OVERSIGHT

NOTE

DOE has delegated the authority to CCP to characterize and certify TRU waste to be shipped to the WIPP. Nonetheless, the Host site retains the responsibility for proper disposal as the waste generator on behalf of DOE. Accordingly, the following actions will define the level of oversight of the CCP by Host site personnel.

6.1 The Host site will accept successful completion of the CBFO certification audit as adequate evidence that the CCP implementation at the Host site is fully compliant with waste disposal requirements as set forth in the CH and RH WAC and WAP. However, the Host site may conduct, at their discretion, periodic surveillances of CCP operations.

6.2 Following successful completion of the CBFO certification audit, the Host site QA will conduct periodic surveillances to ensure CCP work is conducted in accordance with CCP procedures. These surveillances will be conducted in accordance with Host site QA procedures.

6.3 The Host site QA will provide copies of its surveillance reports to the CCP SPM. The CCP SPM and NWP QA will take the following actions:

6.3.1 Review the Host site surveillance reports for any finding or other deficiencies against the CCP scope of work.

6.3.2 Document and perform corrective actions in accordance with applicable NWP issues management procedures.

6.3.3 Provide Host site QA with CCP actions to correct the identified deficiencies.

6.3.4 NWP QA will maintain an information file of the Host site surveillance reports conducted on the CCP scope of work.

Attachment 1 – Acronyms and Key Definitions

AB	Authorization Basis
ADC	Authorized Derivative Classifier
ADEP	Associate Directorate of Environmental Programs
ADESH	Associate Directorate, Environment, Safety and Health
ADPSM	Associate Directorate Plutonium Science and Manufacturing
AK	Acceptable Knowledge
AKA	Acceptable Knowledge Assessment
AKE	Acceptable Knowledge Expert
BDR	Batch Data Report
~~CAR~~	~~Corrective Action Report~~
CBFO	Carlsbad Field Office
CCP	Central Characterization Program
CFR	Code of Federal Regulations
CH	Contact-Handled
CP	Cognizant personnel
CPP	Central Procurement Program
DOE	U.S. Department of Energy
DOT	U.S. Department of Transportation
DSA	Documented Safety Analysis
EA	Expert Analyst
ES&H	Environment, Health, and Safety Plan
~~EWMO~~	~~Environmental Waste Management Operations~~
FGA	Flammable Gas Analysis
FGE	Fissile Gram Equivalent
FOD	Facility Operations Director
~~FOSC~~	~~EWMO Facility Oversight Safety Committee~~
~~GET~~	~~General Employee Training~~
GGT	Gas Generation Testing
HENC	High Efficiency Neutron Counter
Host Site	LANS
~~HSP~~	~~Health and Safety Plan~~
IPCT	Integrated Process Control Team
~~INL~~	~~Idaho National Laboratory~~
Interface Agreement	An agreement between the CCP and LANL for defining the responsibilities associated with WIPP requirements defined in the reference documents identified in Section 2.1 of the Interface Document.
IWD	Integrated Work Documents
IWMDL	Interface Waste Management Document List
LANL	Los Alamos National Laboratory
LANS	Los Alamos National Security
~~LASO~~	~~Los Alamos Site Office~~
~~LIR~~	~~Laboratory Implementation Requirements~~

Attachment 1 – Acronyms and Key Definitions (Continued)

LO/TO	Lockout/Tagout
LOQI	List of Qualified Individuals
MAR	Material at Risk
~~MILCC~~	~~Mobile ISOCS Large Container Counter~~
~~MSDS~~	~~Material Safety Data Sheet~~
M&TE	Measurement and Test Equipment
nCi/g	nanocuries per gram
NCR	Nonconformance Report
NDA	Nondestructive Assay
NDE	Nondestructive Examination
~~NIST~~	~~National Institute of Science and Technology~~
NPI	Nuclear Process Infrastructure
NWP	Nuclear Waste Partnership
OJT	On-The-Job-Training
ORPS	Occurrence Reporting and Processing System
~~OSHA~~	~~Occupational Safety and Health Administration~~
OS-PT	Operations Support Packaging and Transportation
OSR	Off-Site Source Recovery
OSRP	Off-Site Source Recovery Program
PAAA	Price-Anderson Amendments Act
PE-Ci	Plutonium Equivalent Curies
PDP	Performance Demonstration Program
PID	Prohibited Item Disposition
PMP	Performance Management Plan
QA	Quality Assurance
~~QAPD~~	~~Quality Assurance Program Document~~
QPA-DO	Quality and Performance Assurance Division Office
QSL	Qualified Suppliers List
RANT	Radioassay and Nondestructive Testing
RCRA	Resource Conservation and Recovery Act
~~RCT~~	~~Radiological Control Technician~~
~~RDL~~	~~Responsible Division Leader~~
RH	Remote-Handled
RLM	Responsable Line Manager
RMA	Radioactive Materials Area
RTR	Real-time radiography
RWP	Radiation Work Permit
SDS	Safety Data Sheet
sftp	secure file transfer protocol
SHENC	Super High Efficiency Neutron Counter
SME	Subject Matter Expert
~~SOW~~	~~Statement of Work~~
SPM	Site Project Manager

Attachment 1 – Acronyms and Key Definitions (Continued)

STR	Subcontract Technical Representative
SWB	Standard Waste Box
TA	Technical Area
TCO	Transportation Certification Official
TLD	Thermoluminescent Dosimeters
TRAMPAC	Transuranic Authorized Methods for Payload Control
TRU	Transuranic
TRUPACT	Transuranic Package Transporter
TRUPACT-II	Transuranic Package Transporter Model II
TRU Waste	Waste containing more than 100 nanocuries (nCi) of alpha emitting Transuranic isotopes per gram of waste with half-lives >20 years (for payload containers)
~~TWOM~~	~~TRU Waste Operations Manager~~
TSCA	Toxic Substances Control Act
TSR	Technical Safety Requirements
UCNI	Unclassified Controlled Nuclear Information
USQD	Unreviewed Safety Question Determination
VE	Visual Examination
VPM	Vendor Project Manager
WAC	Waste Acceptance Criteria
WCO	Waste Certification Official
WCPIP	*Remote-Handled TRU Waste Characterization Program Implementation Plan*
WCRRF	Waste Characterization, Reduction, and Repackaging Facility
WIPP	Waste Isolation Pilot Plant
WIPP Requirements	Requirements contained in references identified in documents contained in Section 2.1 of the Interface Document
WSPF	Waste Stream Profile Form
WWIS/WDS	WIPP Waste Information System/Waste Data System

Attachment 2 – Reference Documents (For Information Only)

DOE Carlsbad Documents:

- *Waste Isolation Pilot Plant Hazardous Waste Facility Permit*, ~~EPA No. Waste~~ *Analysis Plan*
- DOE/CBFO-94-1012, *U.S. Department of Energy Carlsbad Field Office Quality Assurance Program Document*
- DOE/WIPP-02-3214, *Remote-Handled TRU Waste Characterization Program Implementation Plan*
- DOE/WIPP-02-3122, *Transuranic Waste Acceptance Criteria For The Waste Isolation Pilot Plant*
- DOE/CBFO-01-1005, *Performance Demonstration Program Plan for Nondestructive Assay of Drummed Wastes for the TRU Waste Characterization Program*
- DOE/CBFO-95-1076, *Performance Demonstration Program Plan For Analysis Of Simulated Headspace Gases*

First-Tier Coordination Documents:

- *Statement of Work for Characterization of LANL TRU Waste (Contact Handled and Remote Handled)*
- FTA-WFM-023, *Agreement between FWO-Waste Facility Management*
- *First-Tier Coordination Documents for the RH TRU Waste Characterization Program Implementation Plan*

First-Tier Certification Documents:

- WP 13-1, Nuclear Waste Partnership LLC, *Quality Assurance Program Description*
- CCP-PO-001, *CCP Transuranic Waste Characterization Quality Assurance Project Plan*
- CCP-PO-002, *CCP Transuranic Waste Certification Plan*
- CCP-PO-003, *CCP Transuranic Authorized Methods For Payload Control (CCP CH-TRAMPAC)*

Attachment 2 – Reference Documents (For Information Only) (Continued)

- CCP-PO-505, *CCP Remote-Handled Transuranic Waste Authorized Methods for Payload Control (CCP RH-TRAMPAC)*

Lower-Tier Documents:

- CCP-AK-LANL-004, *Central Characterization Program Acceptable Knowledge Summary Report For Los Alamos National Laboratory TA-50 Mixed Transuranic Waste, Waste Streams: LA-MIN03-NC.001, LA-CIN02.001, LA-MHD09.001*
- CCP-AK-LANL-006, *Central Characterization Program Acceptable Knowledge Summary Report For Los Alamos National Laboratory TA-55 Mixed Transuranic Waste, Waste Streams: LA-MHD01.001, LA-CIN01.001, LA-MIN02-V.001, LA-MIN04-S.001*
- CCP-AK-LANL-008, *Central Characterization Project Acceptable Knowledge Summary Report For Los Alamos National Laboratory Off-Site Source Recovery Project Sealed Sources, Waste Streams: LA-OS-00-01.001, LA-OS-00-03, and LA-OS-00-04*
- CCP-AK-LANL-009, *Central Characterization Program Acceptable Knowledge Summary Report For Los Alamos National Laboratory Chemistry and Metallurgy Research (CMR) Facility, Waste Streams: LA-MHD03.001, LA-CIN03.001, LA-MIN05-V.001*
- CCP-AK-LANL-010, *Central Characterization Program Acceptable Knowledge Summary Report For Los Alamos National Laboratory TA-21 DP West Facility Waste Streams: LA-MHD04.001, LA-MSG04.001, LA-CIN04.001*
- CCP-AK-LANL-012, *Central Characterization Program Acceptable Knowledge Summary Report for Los Alamos National Laboratory TA-48 Alpha Facility Waste Stream: LA-MHD08.001*
- CCP-AK-LANL-013, *Central Characterization Program Acceptable Knowledge Summary Report for Los Alamos National Laboratory Lovelace Respiratory Research Institute Waste Stream: LA-MHD05-ITRI.001*
- CCP-CM-001, *CCP Equipment Change Authorization and Documentation*
- CCP-CM-003, *CCP HighEfficiency Neutron Counter (HENC-01) (Equipment #NDA-HENC-01) Equipment Description*
- CCP-CM-005, *CCP High-Efficiency Neutron Counter (HENC) (Equipment #NDA-HENC-03) Equipment Description*

Attachment 2 – Reference Documents (For Information Only) (Continued)

Lower-Tier Documents (Continued):

- CCP-CM-018, *CCP Real-Time Radiography MCS Unit #3 LANL Unit #2 (RTR #2) (Equipment #NDE-RTR-03/LANL-RTR-02) Equipment Description*
- CCP-CM-024, *CCP High-Efficiency Neutron Counter (HENC-02) (Equipment #NDA-HENC-02) Equipment Description*
- CCP-CM-028, *CCP Real-Time Radiography LANL Unit #1 (Equipment #LANL-RTR-01) Equipment Description*
- CCP-CM-032, *CCP Super High-Efficiency Neutron Counter (SuperHENC) Equipment Description*
- ~~CCP-HSP-014, *Health and Safety Program Implementation for CCP*~~
- CCP-PO-005, *CCP Conduct of Operations*
- CCP-PO-006, *CCP Conduct of Operations Matrix*
- CCP-PO-012, *CCP/Los Alamos National Laboratory (LANL) Interface Document*
- CCP-PO-016, *CCP Gas Generation Testing Quality Assurance Project Plan*
- CCP-PO-026, *CCP Configuration Management*
- CCP-QP-001, *CCP Graded Approach*
- CCP-QP-002, *CCP Training and Qualification Plan*
- CCP-QP-005, *CCP TRU Nonconforming Item Reporting and Control*
- CCP-QP-008, *CCP Records Management*
- CCP-QP-010, *CCP Document Preparation, Approval, and Control*
- CCP-QP-016, *CCP Control of Measuring and Testing Equipment*
- CCP-QP-022, *CCP Software Quality Assurance Plan*
- CCP-QP-040, *Support Training*

Attachment 2 – Reference Documents (For Information Only) (Continued)

Lower-Tier Documents (Continued):

- CCP-TP-001, *CCP Project Level Data Validation and Verification*
- CCP-TP-002, *CCP Reconciliation of DQOs and Reporting Characterization Data*
- ~~CCP-TP-003, *CCP Data Analysis for S3000, S4000, and S5000 Characterization*~~
- CCP-TP-005, *CCP Acceptable Knowledge Documentation*
- CCP-TP-030, *CCP CH TRU Waste Certification and WWIS/WDS Data Entry*
- CCP-TP-033, *CCP Shipping of CH TRU Waste*
- CCP-TP-053, *CCP Standard Real-Time Radiography (RTR) Inspection Procedure*
- CCP-TP-054, *CCP Adjustable Center of Gravity Lift Fixture Preoperational Checks and Shutdown*
- CCP-TP-055, *CCP Varian Porta-Test Leak Detector Operations*
- CCP-TP-059, *CCP Operating the Super High Efficiency Neutron Counter (~~Super~~HENC) Using NDA 2000*
- CCP-TP-063, *CCP Operating the High Efficiency Neutron Counter Using NDA 2000*
- CCP-TP-064, *CCP Calibrating the High Efficiency Neutron Counter and the Super High Efficiency Neutron Counter Using NDA 2000*
- CCP-TP-066, *CCP Radiography Screening Procedure for Prohibited Items*
- CCP-TP-068, *CCP Standardized Container Management*
- CCP-TP-069, *CCP Sealed Source Visual Examination and Packaging*
- CCP-TP-076, *CCP Operating the Mobile ISOCS Large Container Counter Using NDA 2000*
- CCP-TP-077, *CCP Calibrating the Mobile ISOCS Large Container Counter Using NDA 2000*
- CCP-TP-082, *CCP Waste Container Filter Vent Maintenance and Operation*

Attachment 2 – Reference Documents (For Information Only) (Continued)

Lower-Tier Documents (Continued):

- CCP-TP-083, *CCP Gas Generation Testing*
- CCP-TP-086, *CCP CH Packaging Payload Assembly*
- ~~CCP-TP-089, *CCP Mobile Gas Generation Testing Sampling System (MGSS) Sampling Operation*~~
- CCP-TP-101, *CCP Off-Site Source Recovery Project Sealed Source Radiological Characterization*
- CCP-TP-103, *CCP Data Reviewing, Validating, and Reporting Procedure for the NDA Counters at LANL Using NDA 2000*
- CCP-TP-107, *CCP Operating the High Efficiency Neutron Counter #3 (HENC #3) Using NDA 2000*
- CCP-TP-108, *CCP Calibrating the High Efficiency Neutron Counter #3 (HENC #3) Using NDA 2000*
- CCP-TP-113, *CCP Standard Contact-Handled Waste Visual Examination*
- CCP-TP-120, *CCP Container Management*
- CCP-TP-121, *CCP RTR #1 Operating Procedure*
- CCP-TP-122, *CCP RTR #2 Operating Procedure*
- CCP-TP-198, *CCP HE-RTR Operating Procedure*
- CCP-TP-506, *CCP Preparation of the Remote-Handled Transuranic Waste Acceptable Knowledge Characterization Reconciliation Report*
- CCP-TP-507, *CCP Shipping of Remote-Handled Transuranic Waste*
- CCP-TP-530, *CCP RH TRU Waste Certification and WWIS/WDS Data Entry*
- DOE/WIPP 02-3183, *CH Packaging Program Guidance*
- DOE/WIPP 02-3184, *CH Packaging Operations Manual*
- DOE/WIPP 02-3220, *CH Packaging Operations for High-Wattage Waste*
- DOE/WIPP 02-3283, *RH Packaging Program Guidance*

Attachment 2 – Reference Documents (For Information Only) (Continued)

Lower-Tier Documents (Continued):

- DOE/WIPP 02-3284, *RH Packaging Operations Manual*
- DOE/WIPP 02-3285, *RH Packaging Maintenance Manual*
- DOE/WIPP 06-3345, *Waste Isolation Pilot Plant Flammable Gas Analysis*
- WP 08-PT.13 *RH-TRU 72-B Cask Uprighting Trailer Operation and Maintenance Manual*
- WP 15-GM1002, *Issues Management Processing of WIPP Forms*

Attachment 3 – LANS Host Site Required Documents (For Information Only)

Upper-Tier LANL Documents:

- Integrated Work Management, P 300
- Verification of Readiness to Start Up or Restart LANL Nuclear Facilities, Activities, and Operations, P 115
- Procedure for Pause/Stop Work, P 101-18
- ~~Cryogenic Fluids or~~ Cryogens, P 101-5
- Lockout/Tagout for Hazardous Energy Control, P 101-3
- Personal Protective Equipment, P 101-6
- Cranes, Hoists, Lifting Devices, and Rigging Equipment, P 101-25
- ~~LANL~~ Emergency Management, PD 1200-1
- Waste Management , P 409
- LANL Packaging and Transportation Program Procedure P 151-1
- Integrated Safeguards and Security Management, SD 200
- Nuclear ~~Safeguards~~ Material Control and Accountability, PD 205
- Performance Improvement from Abnormal Events , P 322-3
- ~~Hazardous Waste Operations and Emergency Response Training Requirements~~
- ~~LANL~~ Fire Protection Program, PD 1220
- Radiation Protection, P 121-~~1~~
- ~~Institutional Service Model for Facility Management and Operations~~
- ~~10 CFR Part 830, *Nuclear Safety Management*~~
- ~~10 CFR Part 835, *Occupational Radiation Protection*~~
- ~~10 CFR Part 851, *Worker Safety and Health Program*~~

Attachment 3 – LANS Host Site Required Documents (For Information Only)
(Continued)

~~Upper-Tier LANL Documents (Continued):~~

- ~~Title 40 CFR, *Protection of Environment*~~
- ~~Title 49 CFR, *Transportation*~~

Lower-Tier LANL Documents:

- EP-DIR-AP-10001, *ADEP Document Control*
- EP-PLAN-3201, *TA-54 Health and Safety Plan*
- PD 1022, *Review and Release of Scientific and Technical Information*
- P204-2, *Classified Matter Protection and Control Handbook*
- ~~*Real Time Radiography (RTR) Quick Scan Operations*~~

Federal Documents

- 10 CFR Part 830, *Nuclear Safety Management*
- 10 CFR Part 835, *Occupational Radiation Protection*
- 10 CFR Part 851, *Worker Safety and Health Program*
- Title 40 CFR, *Protection of Environment*
- Title 49 CFR, *Transportation*

~~Attachment 4 – LANL Responsibilities Crosswalk~~

	~~TA-54~~	~~TA-55~~
	~~LANS Waste Disposition Division LeaderLTP Director/Designee~~	~~Nuclear Process Infrastructure (NPI) Division Leader/Designee~~
~~Environmental Waste Management Operations (EWMO) Facilities Operations Director/Designee~~		~~TA-55 Facility Operations Director/Designee~~
~~LTP Production Control Manager~~	~~Production Planning and Control (NPI-2)~~	
~~LTP Shipping and Safe Storage Manager (SSS-PM)~~	~~Hazardous Materials Management (NPI-7)~~	
~~LANL LTP Source Custodian~~	~~NPI-7 Source Custodian~~	
~~LANL Industrial Hygiene Support~~	~~Environment Safety and Health Deployed Services (DSESH-TA55)~~	

Figure 1. CCP-LANL Communications Flow Chart

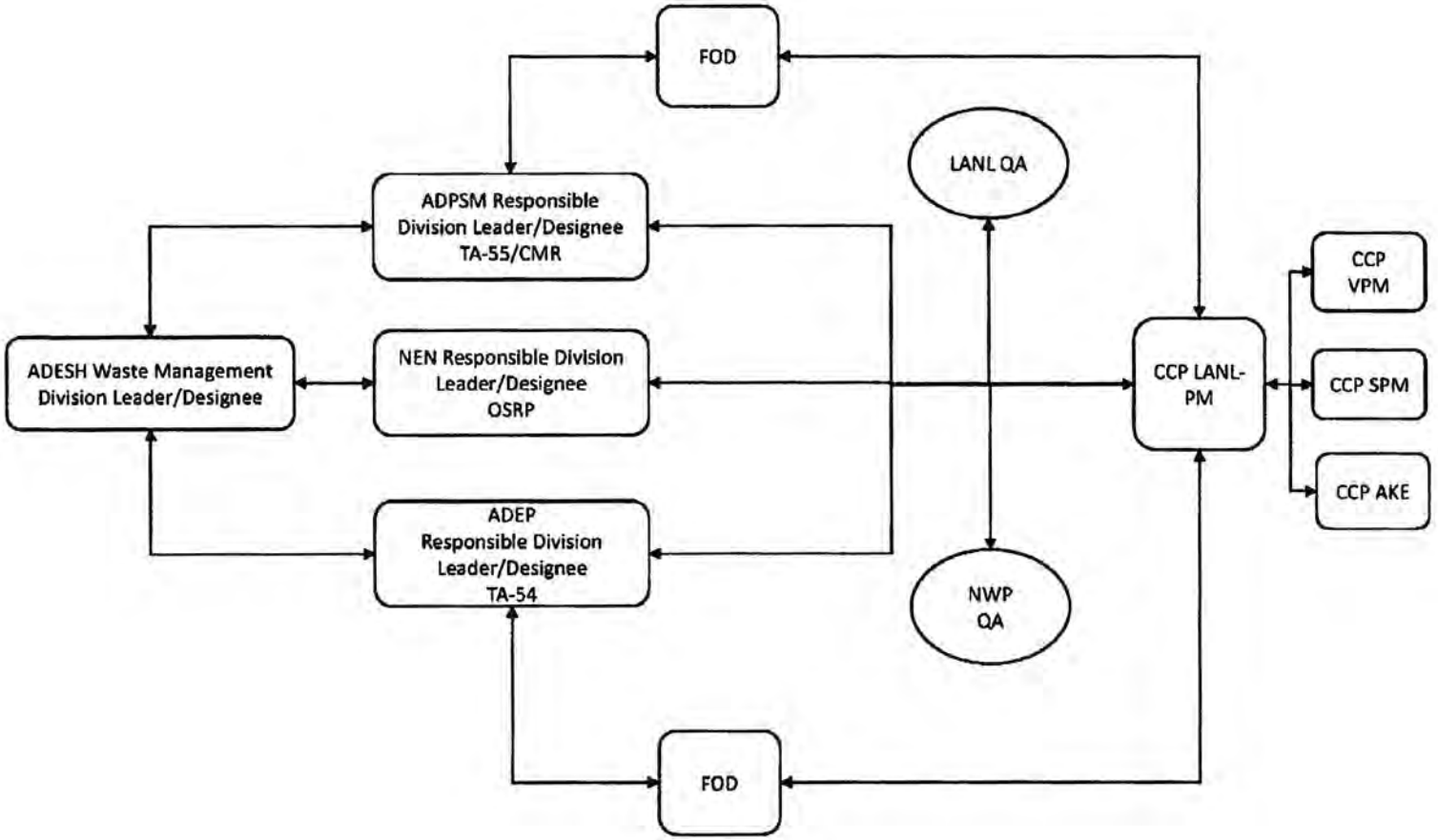


Figure 21. Nuclear Waste Partnership – LANL

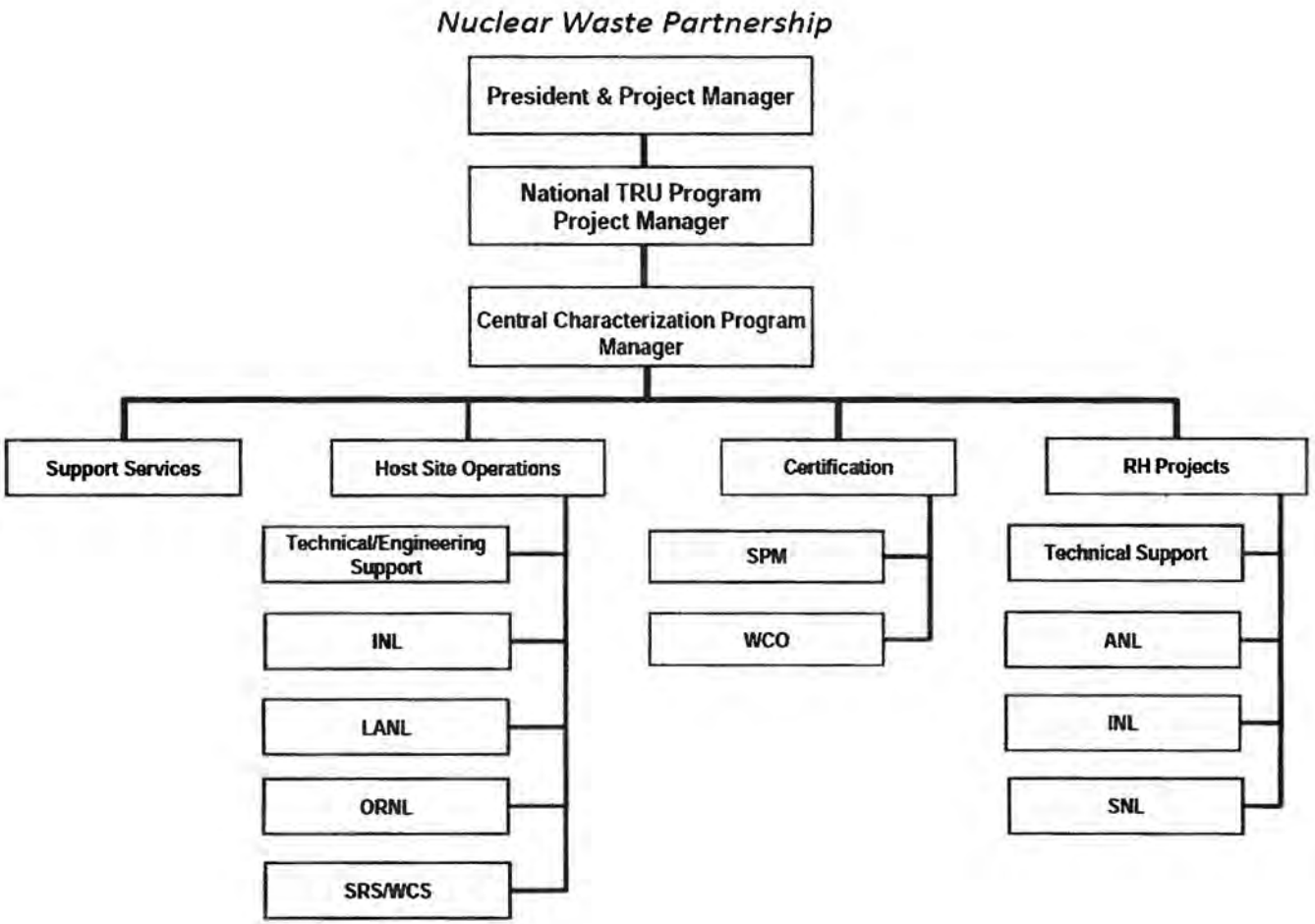


Figure 3. Environmental Programs

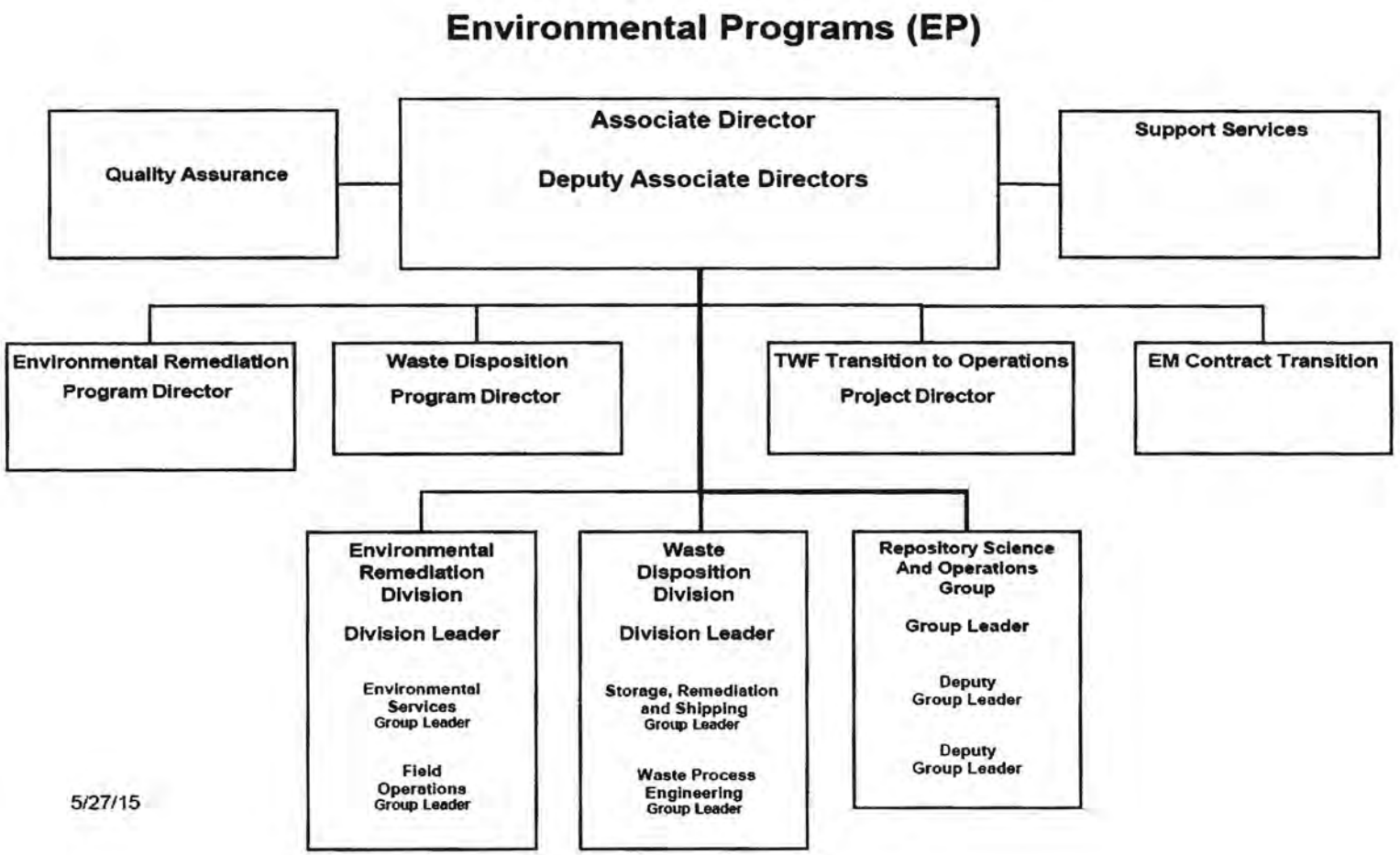


Figure 4. ADPSM: Nuclear Process Infrastructure

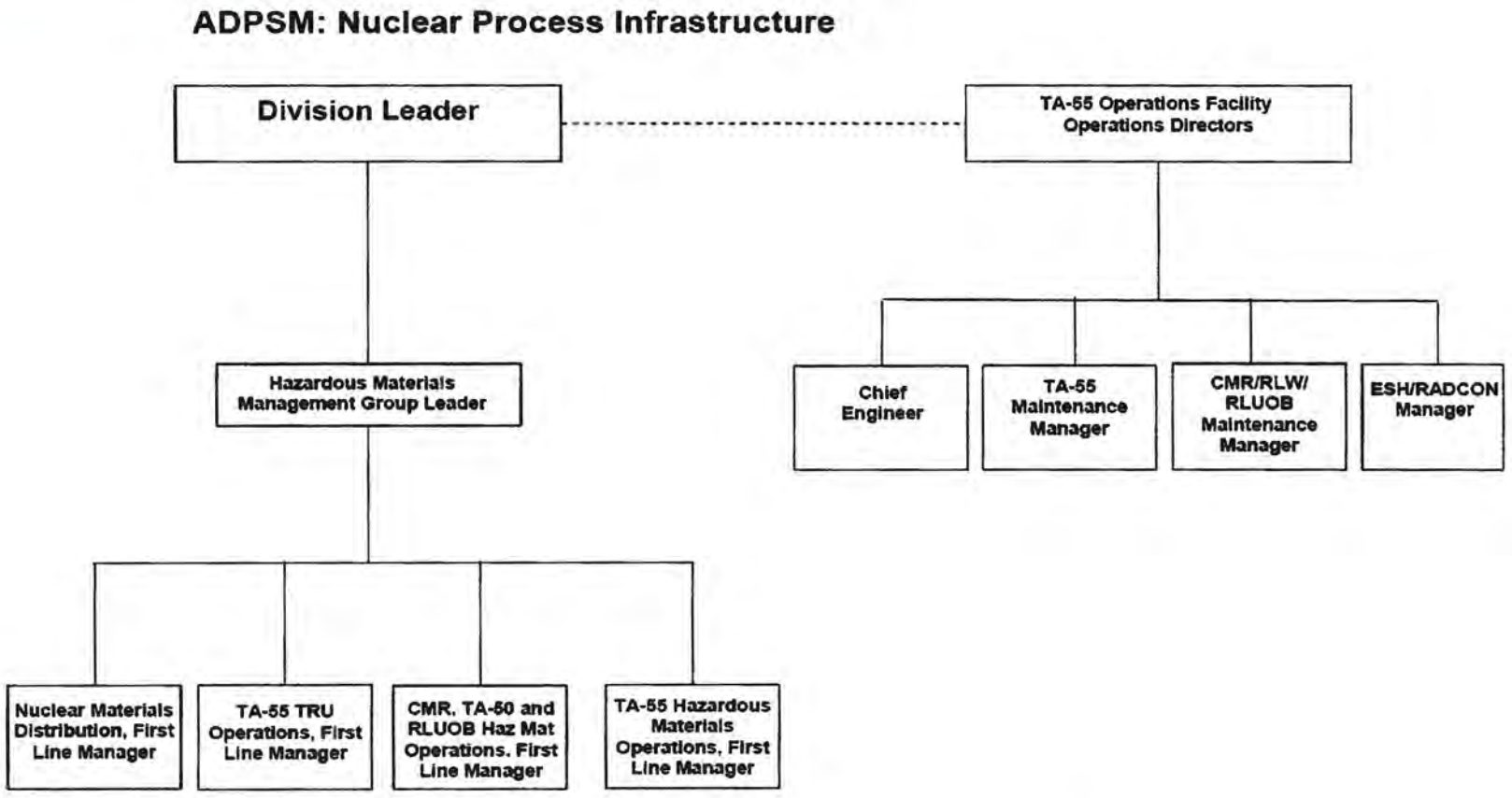
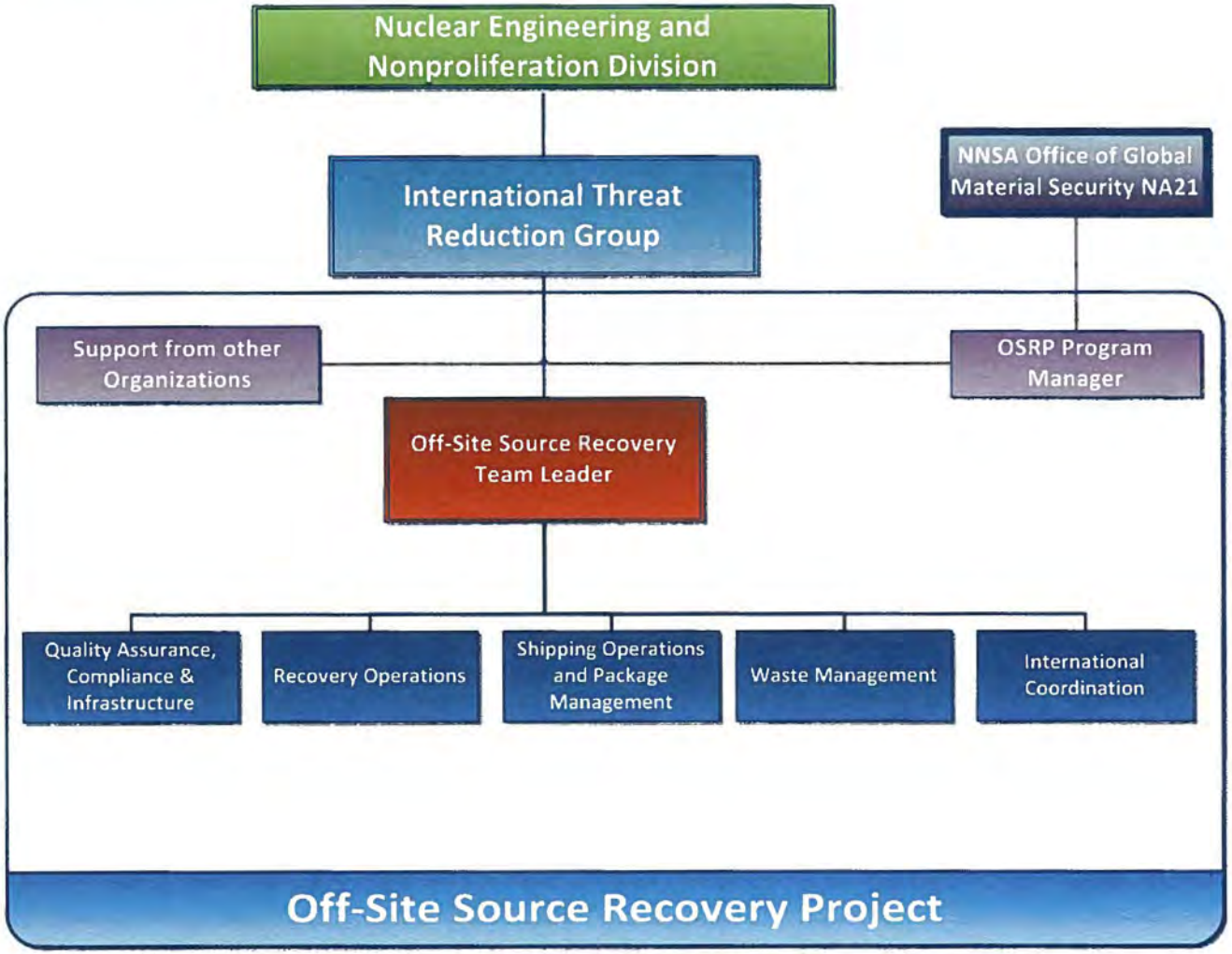
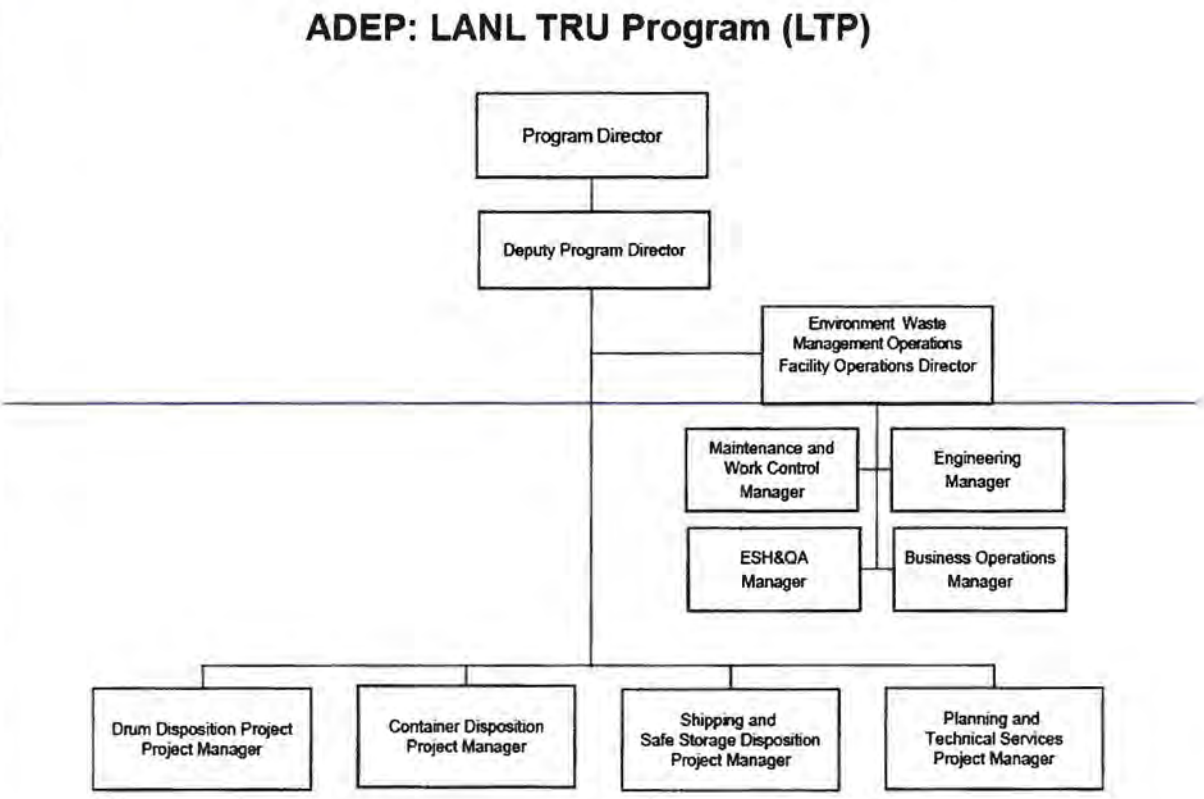


Figure 5. NEN Nuclear Nonproliferation Division



~~Figure 2. Waste Disposition Project~~



Appendix 2

Revised *CCP/LANL Interface Document*, CCP-PO-012, Rev16, February 26, 2016
(clean copy)

Controlled
Copy

CCP-PO-012

Revision 16

CCP/Los Alamos National Laboratory (LANL) Interface Document

EFFECTIVE DATE: 02/26/2016

Mike Ramirez

PRINTED NAME

APPROVED FOR USE

RECORD OF REVISION

Revision Number	Date Approved	Description of Revision
0	10/21/2003	Initial Issue.
1	12/16/2003	Revised the Scope of the document. Updated Section 2.1 References. Updated Section 3.0, steps 3.7 VPM responsibilities and inserted step 3.10 LANL SPQAO responsibilities. Corrected referenced section in step 4.14.4. Updated Figure 1.
2	04/20/2004	Interface Document updated to reflect changes in work scope and joint organizational responsibilities.
3	04/26/2004	Incorporated CBFO Adequacy Review Comment resolutions to Section 1.0 and inserted step 4.17.
4	03/31/2006	Revised to make organizational changes, changes to be consistent with Statement of Work (SOW) clarifications, and changes to reflect coordination details learned during Fiscal Year (FY) 2004. Revised based on the Implementation Plan for CCP Characterization Operations Improvements.
5	11/16/2006	Revised to incorporate controls in the Central Characterization Project (CCP) Basis for Interim Operation (BIO) for the Waste Isolation Pilot Plant (WIPP) Mobile Characterization Units and to provide notifications between the Host site, CCP, and WIPP site. Revised to implement the Waste Isolation Pilot Plant Hazardous Waste Facility Permit requirements resulting from the Section 311/Remote-Handled (RH) Permit Modification Request (PMR).
6	08/06/2007	Revised to clarify Authorization Basis and Configuration Management requirements and editorial changes.
7	05/08/2008	Revised to reflect corrective actions identified during accident investigation and follow-up safety assessments.
8	12/29/2010	Minor revision to update references to the *Waste Isolation Pilot Plant Hazardous Waste Facility Permit.*
9	01/04/2012	Revised to incorporate box line operating procedures, CCP-TP-059, *CCP Operating the Super High Efficiency Neutron Counter (SuperHENC) Using NDA 2000,* and CCP-TP-198, *CCP HE-RTR Operating Procedure,* and make any editorial changes necessary.
10	07/09/2012	Procedure is being revised to correctly describe the process for receiving Central Procurement Project supplied commodities at Los Alamos National Laboratory.

RECORD OF REVISION (Continued)

Revision Number	Date Approved	Description of Revision
11	10/01/2012	Revised to incorporate Nuclear Waste Partnership (NWP) transition changes.
12	11/05/2012	In response to CAR-LANL-0003-12, revised to clarify roles associated with providing measuring and testing equipment (M&TE) Certificates of Calibration to Central Characterization Program (CCP).
13	06/25/2013	Incorporate the Gas Generation Testing (GGT) process, In Situ Object Counting Systems (ISOCS) process, and editorial changes. Revised to implement the Permit Modification Request Class 2 approved by New Mexico Environment Department (NMED) dated March 13, 2013.
14	10/30/2013	Incorporate CCP-TP-068, *CCP Standardized Container Management* for container management and incorporate additional responsibility titles for operations at Technical Area (TA)-55.
15	01/23/2014	Revised to provide the allowance to use either CCP-TP-120, *CCP Container Management* or CCP-TP-068, *CCP Standardized Container Management,* for container management.
16	02/26/2016	Revised format and content to better align with standardized Central Characterization Program (CCP) interface document format and to address enhancements pertaining to the Acceptable Knowledge (AK) process, and to realign responsibilities based on Host site reorganization.

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1.0 PURPOSE

Through the Performance Management Plan (PMP) of July 2002, the U.S. Department of Energy (DOE) Carlsbad Field Office (CBFO) designated the Central Characterization Program (CCP) to provide assistance to the waste processing portion of the Transuranic (TRU) Program at the Los Alamos National Laboratory (LANL) site. This document establishes the CCP/LANL interfaces between CCP and Los Alamos National Security, LLC (LANS) necessary to implement the requirements of the TRU Waste Program. All activities discussed in this document apply to the TRU Waste Program whether identified, conducted or implemented by CCP or LANS personnel.

1.1 Scope

LANS is responsible to provide the infrastructure and associated programs necessary to support all activities described in this Interface Document. CCP will assist LANS by (a) providing a Waste Isolation Pilot Plant (WIPP)-certified program for the characterization, certification, and shipment of LANL TRU wastes, (b) training and qualifying personnel so that they can perform activities under the CCP WIPP-certified program in compliance with DOE Orders relevant to nuclear facilities, (c) providing services, personnel, and equipment to augment LANS required activities.

These services will be performed with CCP and/or Host site equipment operated with appropriate DOE/CBFO certified procedures. CCP may train Host site personnel to perform CCP characterization activities as needed and agreed to by the Host site.

Host site maintains ownership of the waste and responsibility for its disposal. This responsibility includes additional chemical sampling and analysis deemed necessary by the WIPP Co-Permittees.

The Host site has primary responsibility for assuring that requirements for safety (including Radiological Control, Emergency Management, Industrial Hygiene and Safety), security, safety basis, environmental protection, compliance, and other areas are met for CCP activities.

CCP will work under LANS' approved Environment, Safety, and Health (ES&H) Program. On-site CCP personnel will be trained to and comply with LANL hazardous and solid waste regulatory requirements. LANS is responsible for supervising and overseeing the implementation of LANS' ES&H Program, including compliance with Federal, State, and Local regulations protecting workers, the environment, waste management/disposal, and chemical usage. LANS has responsibility for taking such action as is deemed necessary to ensure compliance with Resource, Conservation and Recovery Act (RCRA), and Toxic Substances Control Act (TSCA), DOE Orders and LANS' requirements related to environmental compliance and waste management within LANL.

CCP has responsibility for the safety of CCP employees, CCP subcontractors, and its lower-tier subcontractors as defined in this document. LANS is responsible for reporting conditions or concerns that may have safety, health, quality assurance (QA), security, operational or environmental implications; and therefore, LANS will provide oversight to this scope as set forth in Section 6.0. TRU Program activities, whether performed by CCP personnel or CCP activities performed by LANS personnel at LANL will be under the control of the CCP LANL Project Manager/Designee and Responsible Division Leader/Designee except for the Nuclear Waste Partnership (NWP) Assurance Programs Manager (See Figure 2, Nuclear Waste Partnership – LANL), and CCP activities at LANL will be directly under the control of the CCP LANL Project Manager/Designee. In turn, the CCP LANL Project Manager/Designee will report through the specific Responsible Division Leader/Designee for the program/project being supported.

This document applies to all personnel identified on the detailed LANS/CCP organization charts shown in Figures 2 through Figure 5.

This document addresses responsibilities associated with TRU waste characterization and certification as well as other characterization support provided to LANL by CCP. This document also defines interface requirements for the following areas:

- Initial Setup for Operations
- Routine Operations
- Training
- Container Management
- Deficiencies
- Visual Examination (VE) and Prohibited Item Disposition (PID)
- Filter Inspection/Filter Change out
- Real-Time Radiography
- Nondestructive Assay (NDA) (certified and non-TRU waste data)
- Source Control
- Flammable Gas Analysis (FGA)
- Acceptable Knowledge (AK)
- Off-Site Source Recovery Program (OSRP)
- Project Office Certification Activities
- Transportation
- Measurement and Test Equipment (M&TE)
- Procedures
- Documents/Records
- Procurement
- Oversight
- QA
- Price-Anderson Amendments Act (PAAA)
- 10 Code of Federal Regulations (CFR) Part 851, *Worker Safety and Health Program*
- Gas Generation Test (GGT)

2.0 REQUIREMENTS

2.1 This document implements the applicable requirements of the following:

- CCP-PO-001, *CCP Transuranic Waste Characterization Quality Assurance Project Plan*
- CCP-PO-002, *CCP Transuranic Waste Certification Plan*
- CCP-PO-003, *CCP Transuranic Authorized Methods For Payload Control (CCP CH-TRAMPAC)*
- CCP-PO-005, *CCP Conduct of Operations*
- CCP-PO-026, *CCP Configuration Management*
- DOE/WIPP-02-3183, *CH Packaging Program Guidance*
- DOE/WIPP-06-3345, *Waste Isolation Pilot Plant Flammable Gas Analysis*
- DOE/WIPP-94-1012, *Quality Assurance Program Document*, Carlsbad New Mexico, U.S. DOE Carlsbad Field Office
- WP 13-1, *Nuclear Waste Partnership LLC, Quality Assurance Program Description*
- PD103, *Worker Safety and Health Program*
- P121, *Radiation Protection*

2.2 Acronyms and Key Definitions

Attachment 1, Acronyms and Key Definitions, lists acronyms and key definitions used in this Interface Document.

2.3 Criteria

The CCP Certified Program will be used to characterize, certify, and ship LANL's TRU waste to WIPP. The specific requirements documents to ensure compliance with the certified program are listed in Attachment 2, Reference Documents.

There are Host site documents used that are not part of the CCP Certified Program. These documents are listed in Attachment 3, LANS Host Site Required Documents.

3.0 RESPONSIBILITIES

CCP has primary responsibility for performing TRU waste characterization, certification, and transportation activities in accordance with governing requirements described herein. CCP services include compilation, reporting, and confirmation of acceptable knowledge (AK), nondestructive examination (NDE), which includes real-time radiography (RTR), and visual examination (VE), nondestructive assay (NDA), Flammable Gas Analysis (FGA) for transportation, data validation and verification, waste certification, WIPP Waste Information System/Waste Data System (WWIS/WDS) data entry, and transportation activities. Through the characterization activities performed, CCP provides support to LANL in demonstrating compliance with Policy P409, *LANL Waste Management,* and the *LANL Hazardous Waste Facility Permit*.

The Host site's responsibilities are limited to the CCP activities described herein being performed on their behalf and for performing TRU waste management activities in accordance with Host site/generator documents provided to CCP.

NOTE

The titles for LANL personnel delineated throughout the document are generic. Communications paths are depicted on Figure 1, CCP-LANL Communications Flow Chart.

3.1 CCP LANL Project Manager/Designee

3.1.1 Confirms that waste characterization activities are conducted at LANL per the Interface Document.

3.1.2 Provides primary oversight for project safety, and compliance of CCP personnel at LANL to CCP's certified program requirements.

3.1.3 Requests personnel and equipment from the Responsible Division Leader/Designee to support characterization, certification, and transportation, as required.

3.1.4 Provides support to the CCP Site Project Manager (SPM).

3.1.5 Receives documentation of required and completed LANL site-specific training.

3.1.6 Provides weekly production reports to the DOE/CBFO and LANS Responsible Division Leader/Designee.

3.1.7 Receives reports of LANS oversight activities from Facility Operations Director (FOD) and Responsible Division Leader/Designee and formally responds, as required.

3.1.8 Interfaces with DOE/CBFO through the CCP Project Office.

3.1.9 Requests special nuclear material sources from LANS Responsible Division Leader/Designee.

3.1.10 Ensures CCP personnel comply with LANS integrated work management, environmental, safety, and security requirements.

3.1.11 Ensures CCP procedures are approved by Host site.

3.1.12 Manage CCP support within agreed to funding and scope.

3.1.13 Function as the point of contact to coordinate CCP reviews of LANL procedures and waste processing plans by appropriate CCP SMEs. The review will analyze impacts on the CCP characterization process as well as requirements specified in DOE/WIPP 02-3122, *Transuranic Waste Acceptance Criteria For The Waste Isolation Pilot Plant* (WIPP-WAC); *Contact-Handled Transuranic Waste Authorized Methods for Payload Control* (CH-TRAMPAC); *Waste Isolation Pilot Plant Hazardous Waste Facility Permit, Waste Analysis Plan* (WIPP-WAP).

3.1.14 Participate on the Waste Processing Integrated Process Control Teams (IPCTs) for waste that will be shipped to WIPP.

3.1.15 Interface with the Waste Characterization and Processing Review Board.

3.1.16 Ensure that characterization data generated by CCP in the process of waste characterization including RTR, VE, NDA and FGA is available to the Responsible Division Leader/Designee.

3.2 LANS Program Manager

3.2.1 Negotiate with CCP Project Manager to establish scope of work, needed resources and associated funding required to complete the agreed to scope.

3.2.2 Ensure agreed to funding is provided to CCP to support onsite activities in support of LANS.

3.3 Responsible Division Leader/Designee

3.3.1 Formally designate LANS personnel responsible for performing key responsibilities and communicate Designees to CCP LANL Project Manager.

3.3.2 Ensures LANS completes performance measures/metrics as established by appropriate local DOE office.

3.3.3 Functions as the point of contact with CCP LANL Project Manager for coordination and review of CCP procedures, plans, waste stream profile forms, AK Summary Reports, CCP Interface Waste Management Document Lists (IWMDL) and CCP Acceptable Knowledge Assessments (AKAs) and configuration management documents.

3.3.4 Ensures cognizant Host site and generator Point of Contacts/Subject Matter Experts (SMEs) are identified and available as necessary to support the review of CCP documents defined in step 4.24.5.

3.3.5 Coordinates review, provides comments, and approves comment resolutions on documents listed in Section 4.24.5. This includes facilitating generator document review and comment resolution as necessary. The review and comment resolution will be documented in accordance with CCP-QP-010, *CCP Document Preparation, Approval, and Control.*

3.3.6 Ensures CCP personnel have access to facilities to observe operations and interview personnel associated with generation, packaging, repackaging, or treatment of TRU waste.

3.3.7 Interfaces with DOE/CBFO through the appropriate local DOE office.

3.3.8 Coordinates all LANS activities in support of TRU Programs working with CCP LANL Project Manager/Designee.

3.3.9 Manages the control, and tracking of containers through the CCP characterization process utilizing the CCP SPM-designated container selection list (AK Tracking Spreadsheet).

3.3.10 Ensures that applicable container tracking information is maintained and kept current as required to LANL site requirements.

3.3.11 Generates and submits regular, periodic production reports.

3.3.12 Ensures Unreviewed Safety Question Determinations (USQD) are completed to ensure that CCP operations and activities are performed in accordance with the applicable Safety Basis Documents.

3.3.13 Ensures modifications to CCP procedures, equipment, and facilities undergo Host site review and USQD.

3.3.14 Responsible for ensuring project compliance with LANS Waste Management and Environmental Compliance requirements.

3.3.15 Ensures that containers are processed in conjunction with the CCP SPM or CCP Vendor Project Manager (VPM).

3.3.16 Ensures Material at Risk (MAR) inventory limits established by the Documented Safety Analysis (DSA) for each facility, are not exceeded.

3.3.17 Approves CCP health and safety-specific documents, including Integrated Work Documents (IWDs), as the Responsible Line Manager (RLM).

3.3.18 Ensures Facility Service Requests submitted by CCP are completed within a time frame agreed to by the LANL CCP Project Manager/Designee.

3.3.19 Provides temperature-controlled environment for staging waste containers prior to RTR when temperatures are below freezing.

3.3.20 Provides Lockout/Tagout (LO/TO) support for work performed on the CCP equipment.

3.3.21 Provides work control resources for corrective or preventive maintenance on LANS-owned utilities or equipment or on CCP-owned equipment, as requested.

3.3.22 Ensures facility-specific training requirements for CCP operations at LANL are defined, training plans are established and implemented, and information on training status is provided to CCP Training.

3.3.23 Ensures notification is made to CCP of any new training requirements.

3.3.24 Coordinates Radiological Control Technician support and dosimetry for characterization and transportation operations.

3.3.25 Coordinates Industrial Hygiene support for characterization and transportation operations.

3.3.26 Participates in Readiness Assessments or surveillances, as required.

3.3.27 LANS personnel perform waste handling operations in support of CCP as assigned by LANS supervision.

3.3.28 Provides Source Custodian support to maintain nuclear material source control in accordance with LANS requirements.

3.3.29 Designates LANL Cognizant Host site/Generator Personnel (CP) to interact with the CCP Acceptable Knowledge Expert (AKE) and assist the AKE with AK collection.

3.3.30 Ensures that AK Summary Reports, AKA, and Waste Stream Profile Forms are routed to the Waste Management Division Leader for approval.

3.3.31 Distributes results of the AKA to designated CPs for review and comment.

3.3.32 Concurs with final AKA in writing.

3.3.33 Works with the Waste Management Coordinator to comply with Policy P409 and update the operating record for waste activities performed by CCP.

3.3.34 Provides Waste Management Division Leader/Designee with the results of Acceptable Knowledge Assessments (AKA), surveillances and other assessments for the determination of accurate, sufficient, and up-to-date waste characterization.

3.3.35 Provides leadership and direction to ensure that LANL waste is compliantly characterized, managed, stored, and transported.

3.3.36 Engages Waste Management Division Leader in the review and comment resolution of AK Summary Reports and CCP AKAs.

3.3.37 Ensures that characterization information collected by CCP including RTR, NDA, FGA, and VE gets captured in WCATs as required by Policy P409.

3.3.38 Provides documentation of surveillances and audits, applicable to CCP, to the CCP LANL Project Manager/Designee.

3.4 Facilities Operations Director (FOD)/Designee

3.4.1 Provides documentation of surveillances and audits, applicable to CCP, to the CCP LANL Project Manager/Designee.

3.4.2 Ensures that new and/or modifications to documents or equipment for work performed in support of TRU waste activities at nuclear facilities are approved prior to implementation.

3.4.3 Ensures configuration management of LANS-owned equipment is maintained.

[A] Ensures that adequate information is provided to CCP on LANS-owned equipment prior to acceptance and turnover of equipment to CCP.

3.4.4 Ensures CCP/LANS personnel comply with LANS integrated work management, environmental, safety, and security requirements through document reviews, emergency drills, monitoring, surveillances and audits.

3.4.5 Ensures new CCP activities follow the LANL readiness review requirements.

3.4.6 Ensures Technical Safety Requirements (TSR) surveillances are conducted as required.

3.4.7 Ensures Fire Protection and other facility surveillances, are performed when required.

3.4.8 Releases approved CCP Integrated Work Documents (IWDs).

3.5 CCP Site Project Manager (SPM)

3.5.1 Functions as CCP's primary interface and point-of-contact between CCP and LANS for certification activities (e.g., data management).

3.5.2 Ensures the AK Summary Reports and container lists for LANL waste streams are prepared, approved, and issued.

3.5.3 Ensures the preparation and approval of waste stream profile forms (WSPFs), as required.

3.5.4 Provides evidence to the CCP LANL Project Manager/Designee and Responsible Division Leader/Designee of the DOE/CBFO Performance Demonstration Program (PDP) participation and successful completion for each operating system.

3.5.5 Responsible for project level verification and validation of batch data reports (BDRs).

3.5.6 Provides support to the CCP LANL Project Manager/Designee.

3.5.7 Ensures that software used by CCP at LANL is controlled in accordance with CCP-QP-022, *CCP Software Quality Assurance Plan*. LANL retains ownership and licenses of LANL developed/procured software.

3.5.8 Confirms that in-process documents are transmitted to the CCP Project Office as soon as practicable.

3.5.9 Provides Responsible Division Leader/Designee with the results of Acceptable Knowledge Assessments (AKA).

3.5.10 Coordinate presentation of AK briefings to CCP characterization personnel POCs/SMEs and cognizant Host site/generator SMEs and CPs.

3.5.11 Provide AKE and Responsible Division Leader/Designee quarterly notifications that the IWMDL are current.

3.5.12 Transmit the AKA to the Responsible Division Leader/Designee for distribution to SME to verify accuracy and completeness and obtain concurrence signature from the Responsible Division Leader/Designee.

3.6 Acceptable Knowledge Expert (AKE)

3.6.1 Collect, compile, and review AK documentation in accordance with CCP-TP-005, *CCP Acceptable Knowledge Documentation.*

3.6.2 Ensures CCP has obtained necessary container information prior to characterization.

3.6.3 Interacts directly with the Responsible Division Leader/Designee to ensure accurate, sufficient, and up-to-date waste characterization information is provided.

3.6.4 Work in conjunction with Responsible Division Leader/Designee to develop an IWMDL for each waste stream.

3.6.5 Work with cognizant Host site/generator personnel to resolve comments and questions.

3.6.6 Submit IWMDL and associated quarterly Responsible Division Leader/Designee notification to the SPM to submit to records.

3.6.7 Performs an AKA for each waste stream.

3.7 NWP QA Engineer/Designee

3.7.1 Reports to the NWP QA Assurance Programs Manager to maintain functional authority and independence from cost and schedule considerations.

3.7.2 Functions as CCP's primary interface and point-of-contact for QA issues between the CCP and LANS.

3.7.3 Validates Nonconformance Reports (NCRs).

3.7.4 Provides semi-annual trending summary reports to the CCP SPM.

3.7.5 Ensures surveillances of waste characterization activities at LANL are performed on a periodic basis and surveillance reports are provided to the CCP SPM, the CCP LANL Project Manager/Designee, and the Responsible Division Leader/Designee.

3.7.6 Performs receipt inspection of procured items in accordance with CCP and Host site requirements.

3.7.7 Provides assistance in generation, disposition, and closure of NCRs and WIPP Forms.

3.7.8 Coordinates with the CCP LANL Project Manager/Designee for any potential Noncompliance Tracking System-Reportable PAAA issues or any occurrence reports resulting from activities under the CCP Certified Program.

3.8 CCP Vendor Project Manager (VPM)/Designee

3.8.1 Obtains Host site management daily release/approval prior to performing CCP operations.

3.8.2 Responsible for safety and health of CCP personnel at LANL.

3.8.3 Monitors the List of Qualified Individuals (LOQI) daily to confirm that only qualified personnel perform waste characterization and transportation activities.

3.8.4 Controls access of CCP personnel including its subcontractors to the field. Request site access for visitors and provide full-time escorts.

3.8.5 Functions as CCP's primary interface and point-of-contact between CCP and LANL for characterization activities (operations).

3.8.6 Supports training and briefing of personnel in regards to procedural changes by scheduling training sessions, as required.

3.8.7 Coordinates the daily operations of CCP operations personnel, and its subcontractors.

3.8.8 Works in conjunction with Responsible Division Leader/Designee to manage the control, movement, and tracking of waste containers through the CCP characterization process.

3.8.9 Coordinates with the Responsible Division Leader/Designee, and CCP LANL Project Manager/Designee for any potential Noncompliance Tracking System-Reportable PAAA issues or any occurrence reports resulting from activities under the CCP Certified Program.

3.8.10 Ensures operability and availability of CCP-provided characterization equipment.

3.8.11 Ensures that CCP-provided equipment is maintained under a CCP approved Configuration Management Program.

3.8.12 Ensures that new additions to and/or modifications made to CCP-provided facilities and/or equipment are submitted to Responsible Division Leader/Designee as soon as practicable and approvals are received prior to implementation.

3.8.13 Ensures applicable manufacturers Safety Data Sheets (SDSs) for products brought to the facility by the CCP are provided to the Operations Center.

3.9 LANL Environment, Safety, and Health (ES&H) Support

3.9.1 Responsible for workplace monitoring, as applicable to the hazards associated with the work and workplace.

3.9.2 Responsible for safety and health compliance reviews, for reviewing and approving IWDs, and for assuring compliance with the LANL safety and health requirements applicable to the CCP operations at LANL.

3.9.3 Responsible for supporting compliance with the LANL Hazardous Waste Facility permit, and all other environmental compliance requirements.

3.9.4 Responsible for supporting compliance with Waste Management Division requirements. And providing support for environmental compliance reviews and audits as a Responsible Division Leader resource.

3.10 LANS QPA Division Leader/Designee

3.10.1 Reports to the Quality & Performance Assurance Division Leader to maintain functional authority and independence from cost and scheduled considerations.

3.10.2 Functions as LANLs primary interface and point-of-contact for QA issues between LANS and CCP.

3.10.3 Provides copies of documentation of assessment activities (including audits and surveillances) to the CCP LANL Project Manager/Designee.

3.10.4 Provide oversight of activities performed in support of this interface agreement using LANS programs and procedures.

3.11 CCP Operations

3.11.1 Performs system start-up and calibration of characterization equipment at the Host site.

3.11.2 Operates CCP equipment in accordance with approved procedures including CCP-PO-005, *CCP Conduct of Operations*.

3.11.3 Performs safety walk-downs prior to operation.

3.11.4 Demonstrates CCP operations during DOE/CBFO certification/recertification audits.

3.12 Waste Certification Official (WCO)

3.12.1 Obtains approved Waste Stream Profile Form (WSPF) for containers to be certified.

3.12.2 Will document and certify that all TRU waste payload containers meet the requirements of the WAC, and submit the data to the WWIS/WDS for approval.

3.13 Transportation Certification Official (TCO)

3.13.1 Ensures CCP Transportation personnel are trained and qualified to perform WIPP-compliant CH and RH TRU waste packaging and loading operations at the Host site prior to starting work activities and are listed on the current LOQI.

3.13.2 Provides oversight of CCP Transportation personnel for payload and Overpack assembly and loading.

3.13.3 Builds payloads from certified containers and Overpacks provided by WCOs in WWIS/WDS.

3.13.4 Certifies payloads for transportation to and disposal at WIPP.

3.13.5 Builds shipments from approved payloads in WWIS/WDS.

4.0 INTERFACE

4.1 Initial Setup for Operations

4.1.1 The initial setup and startup of CCP characterization operations have been completed. In addition, the initial certification audit is complete and operations have commenced.

4.1.2 The Host site will provide infrastructure support as additional pieces of equipment or operations are added to the LANL scope.

4.2 Routine Operations

NOTE
Working shifts will be established by the CCP VPM and approved by the Responsible Division Leader/Designee prior to implementation.

4.2.1 The Host site has the overall responsibility for the management of the nuclear materials and operations of the nuclear facilities.

4.2.2 Work performed by CCP personnel (including subcontractors) will be in compliance with Host site and CCP requirements.

4.2.3 CCP personnel will STOP WORK (or Pause), as appropriate and will notify the FOD/Designee and the CCP VPM in the event of a safety concern or suspected environmental impact concern.

4.3 Work Standards

4.3.1 CCP VPM or Designee will perform the following activities to support daily operations:

[A] Ensure that work is performed in accordance with LANL requirements (e.g., LO/TO, Work Control, IWD) by trained and qualified personnel in accordance with approved work documents.

[B] In the event of abnormal condition or occurrence, support an investigation, as required.

[C] Accept custody of waste containers delivered by LANL personnel and control approved waste characterization activities.

[D] Disposition NCRs and WIPP Forms as required, and communicate progress to the CCP LANL Project Manager/Designee and Responsible Division Leader/Designee.

[E] **IF** after Expert Analyst (EA) review, the NDA results indicate greater than 200 Fissile Gram Equivalent (FGE) (measured value plus two times the counting statistics) for a 55-gallon container, or greater than 325 FGE (measured value plus two times the counting statistics) for a standard waste boxes (SWB),
THEN notify the Operations Center and provide results.

[F] Ensure that equipment calibration is performed on CCP operated equipment, in accordance with Section 4.23.

[G] Attend pre-operations briefings performed for all on-site waste characterization personnel and attend the LANS Plan of the Day/Week briefings, as appropriate.

[H] Ensure the safe operation and maintenance of all CCP instruments and equipment.

[I] Ensure the safe operation of equipment by CCP personnel by performing periodic oversight.

[J] Ensure that CCP-provided equipment is properly maintained.

[K] Provide a copy of SDSs to the Operations Center, the CCP LANL Project Manager/Designee, Responsible Division Leader/Designee, and others as appropriate.

[K.1] When new chemicals are to be used, the SDS will be provided to FOD prior to bringing the chemicals on site to ensure that the Chemical Inventory requirements are updated.

4.3.2 Responsible Division Leader/Designee will ensure the following radiological control support is provided for CCP activities:

[A] Maintain radiological postings.

[B] Perform an initial and periodic radiation protection surveys on NDA and RTR equipment and provide an approved survey report to the NDA Team Leader or RTR Team Leader, and the VPM.

[C] Perform radiation protection surveys and monitoring as necessary.

[D] Provide thermoluminescent dosimeters (TLDs) for CCP personnel.

[E] Provide calibrated and source checked survey instrumentation as required.

[F] Issue and/or modify Radiation Work Permits (RWPs) to support CCP activities as needed.

4.3.3 CCP personnel will work under the LANL requirements for LO/TO.

4.3.4 CCP personnel will perform work in accordance with CCP-approved procedures for waste characterization and certification activities and LANS-approved work packages and procedures for non-waste characterization activities (e.g., equipment repairs). Both CCP-approved and LANS-approved processes will comply with LANL requirements.

4.3.5 CCP personnel will operate in accordance with CCP-PO-005, *CCP Conduct of Operations.*

4.3.6 CCP personnel with assistance from LANL Environment, Safety and Health (ES&H) personnel will develop IWDs or other applicable documents for all CCP activities performed at LANL in accordance with LANS policies and submit to the Responsible Division Leader/Designee for approval.

4.4 Training

4.4.1 CCP personnel or Host site personnel who perform work under CCP procedures will be trained and qualified to WIPP requirements in accordance with CCP-QP-002, *CCP Training and Qualification Plan* and/or CCP-QP-040, *Support Training,* as applicable.

4.4.2 CCP and Host site personnel assigned to field operations must complete the Host site-specific training. The Responsible Division Leader/Designee will ensure the Host site-specific training documentation is sent to CCP Training.

4.4.3 Both the CCP training and Host site-specific training must be completed prior to the individual being assigned to perform independent work at the Host site.

4.4.4 Administrative work, such as BDR reviews requiring no access to the characterization activities or processes at the Host site, may be completed by personnel who have not completed the required Host site-specific training. Personnel who have not completed Host site-specific training will not be allowed unescorted access to the characterization activities.

4.4.5 A LOQI will be monitored daily by the CCP VPM to confirm CCP personnel and Host site personnel assigned to CCP are qualified.

4.5 Employee Monitoring

4.5.1 CCP will participate in the LANL radiological monitoring program as required by the radiological work permit process governing work performed.

4.5.2 The CCP LANL Project Manager or CCP VPM will be notified if any bioassay sample provided by CCP personnel indicates that an uptake of material/waste may have occurred or if CCP personnel are required to resubmit bioassay samples as soon as is reasonably possible.

4.5.3 LANS Radiation Protection personnel will perform routine surveys and monitoring for contamination and radiation as specified in LANS policies or procedures. The CCP LANL Project Manager/Designee or CCP VPM and appropriate LANL management personnel will be notified immediately upon the discovery of any loose surface contamination on any CCP-operated characterization equipment. Access to copies of routine survey results will be made available to CCP upon request.

4.5.4 LANS will provide "upon request" the CCP LANL Project Manager/Designee or CCP VPM with the results of continuous or fixed air sample filter analysis as soon as the analysis is complete but not more than 21 days following the removal of the filter from the sampler head, in any monitored area routinely occupied by CCP personnel.

4.6 Container Management

4.6.1 LANS will provide waste to the characterization facilities, depending upon certification and characterization capabilities. All CH containers delivered for characterization will be approved by the CCP VPM as prescribed in CCP-TP-068, *CCP Standardized Container Management* or CCP-TP-120, *CCP Container Management*.

4.6.2 Responsible Division Leader/Designee is responsible for providing documented information to the CCP SPM/Designee on any modification to the container or contents of the container after the AK has been completed by CCP.

4.6.3 The CCP SPM/Designee will review the documented information for modified containers and will notify the Responsible Division Leader/Designee when the containers are approved for entrance into the characterization process.

4.6.4 LANS is responsible for movement of containers and implementing vehicle access controls, from characterization through shipment, including control of containers requiring remediation (prohibited items).

[A] Subcontractor support for container movement and management may be provided through CCP, provided personnel meet LANS training requirements.

[B] LANS and CCP will perform site container management in accordance with the applicable LANL and CCP procedures. This includes verification that the containers are included in the AK Tracking Spreadsheet for characterization by CCP and ensuring that the LANL operating record is kept up to date with container movements by LANS.

4.6.5 CCP is responsible for administratively tracking the containers throughout the CCP characterization processes. Personnel will perform container management in accordance with CCP-TP-068 or CCP-TP-120.

4.6.6 LANS will provide the necessary dose rate and surface contamination information to CCP to certify the containers for disposal (e.g., survey results). All containers will have a Health Physics Materials Survey tag attached to the container prior to movement to CCP for characterization.

4.6.7 If a nonconformance is identified with a container, during the characterization or certification process, the container will be controlled in accordance with CCP-QP-005, *CCP TRU Nonconforming Item Reporting and Control*.

4.7 Deficiencies

4.7.1 If either LANS or CCP personnel, identify a nonconformance condition associated with a waste container during the characterization or certification process, personnel will initiate an NCR in accordance with CCP-QP-005.

4.7.2 The CCP LANL Project Manager/Designee will notify the Responsible Division Leader/Designee of nonconformances by the distribution of NCRs. The Responsible Division Leader/Designee may request any supporting documentation needed by LANS.

NOTE

In some cases, LANS will perform the work required to resolve deficiencies identified in CCP NCRs and will initiate internal documentation as required by the LANL program. However, the CCP NCRs will remain open and CCP NCR Hold Tags will remain on the affected containers until resolution of the NCR condition has been confirmed by CCP under its program. At that point, CCP will close the NCRs and remove the NCR Tags.

4.7.3 If the nonconformance can **NOT** be resolved by CCP (e.g., certain prohibited items or non-certifiable container types), CCP will coordinate with the Responsible Division Leader/Designee to determine the actions to be taken.

4.7.4 CCP will notify the FOD, Responsible Division Leader/Designee, and the CCP LANL Project Manager/Designee immediately of occurrence reports or potential PAAA issues resulting from the CCP scope of work.

4.7.5 The NWP QA will confirm appropriate closure of deficiencies.

4.8 Visual Examination (VE), Repackaging, and Prohibited Item Disposition (PID)

4.8.1 Glovebox operations will have oversight by CCP qualified VE Personnel, as required.

4.8.2 The CCP training programs for VE and VE technique will include OJT training. Personnel performing VE are instructed in the waste generating processes, typical packaging configurations, and waste material parameters expected to be in each Waste Matrix Code at LANL.

4.8.3 PID will be conducted on containers in accordance with approved Host site procedures with oversight by CCP VE trained personnel, as required.

4.9 Filter Inspection/Filter Changeout

4.9.1 LANL/CCP personnel will inspect the filters on containers as part of the container acceptance and will document whether the filter is a WIPP-approved filter. This information will be transmitted to the CCP VPM.

4.9.2 If filter change out is performed on containers that do not require repackaging, the operation will be documented and the information transmitted to the CCP VPM.

4.9.3 LANL/CCP personnel also inspect and verify filter models on containers as part of the FGA sampling process.

4.10 Prescreen Real-Time Radiography (RTR)

4.10.1 CCP personnel will perform prescreening for RTR to identify potentially certifiable containers that can be sent to RTR, as determined by LANL and agreed to by the CCP LANL Project Manager/Designee. This information will be documented and provided to the Responsible Division Leader/Designee.

4.10.2 Using funding provided by LANS, CCP will perform additional pre-screening as requested by LANS to support LANS waste characterization activities (e.g., low-level waste and mixed low-level waste).

4.11 Prescreen Nondestructive Assay (NDA)

4.11.1 CCP personnel will perform prescreening for NDA as determined by LANL and agreed to by the CCP LANL Project Manager/Designee. This information will be documented and provided to the Responsible Division Leader/Designee.

[A] Containers that are less than 100 nanocuries per gram (nCi/g) will be returned to the Host site for disposition. BDR information on these containers will be provided as part of the process of returning the container to LANL.

4.12 Real-Time Radiography (RTR)

4.12.1 RTR will be performed by personnel trained under the CCP Certified Program.

4.12.2 Containers found with prohibited items or conditions requiring remediation (e.g., unvented container liner, liquids not meeting permit requirements) will be flagged, an NCR initiated, and staged for remediation at a later date.

[A] RTR Operators will notify the Operations Center if containers are found to contain compressed gas cylinders.

4.12.3 If a container is found during RTR that is suspected to contain a classified shape, it will be segregated and handled in accordance with LANL procedures.

[A] The information generated during the RTR of the container will be subject to control of potentially classified information. This media will be redacted by LANS, as possible, to remove the potentially classified portion and the revised media will be returned to CCP to complete the associated BDR.

4.12.4 CCP RTR Operators may provide additional interpretation of scans to support other LANS repackaging activities and waste characterization/re-characterizations determined by LANS and agreed to by the CCP LANL Project Manager/Designee.

4.13 Nondestructive Assay (NDA)

4.13.1 NDA will be conducted using certified equipment with personnel trained under the CCP Certified Program.

4.13.2 **IF** assay results are greater than facility AB limits for Plutonium Equivalent Curies (PE-Ci),
THEN NDA personnel will immediately notify the Operations Center, the CCP LANL Project Manager/Designee, the CCP VPM, and the Responsible Division Leader/Designee.

4.13.3 **IF** assay results are greater than the following criticality spacing limitations,
THEN the EA will notify the Operations Center, the CCP LANL Project Manager/Designee and the CCP VPM.

[A] Individual 55-gallon drums or Pipe Overpack Container (POC) of waste exceeding 200 FGE (measured value).

[B] Containers found to exceed the calibration range of the NDA machine.

[C] Individual SWBs, TDOPs or SLB2s of waste exceeding 325 FGE (measured value).

[D] Criticality Control Overpacks (CCO) of waste exceeding 380 FGE (measured value).

4.13.4 If assay results indicate that a container exceeds the Waste Acceptance Criteria (WAC) limits for plutonium equivalent activity, criteria, CCP personnel will issue an NCR in accordance with CCP-QP-005.

4.13.5 For any containers that exceed the shipping limit for FGE, an NCR will be generated in accordance with CCP-QP-005 to return the containers to LANL for repackaging.

4.13.6 For any containers that are less than 100 nCi/g, an NCR will be generated in accordance with CCP-QP-005 to return the containers to LANS.

4.13.7 LANS will provide/refill the cylinder required for the liquid nitrogen for NDA.

4.14 Source Control

4.14.1 LANS will be responsible for NDA sources used for both calibration (reference sources) and for the DOE/CBFO PDP. Responsibilities include inventory control, storage, inspection and handling. Responsibilities include ensuring radiological control support associated with sources is provided, maintaining the Radioactive Materials Area (RMA) postings and periodic surveys, and performing a semi-annual leak check on the reference sources.

4.14.2 LANS will provide support for the participation in the NDA PDP. This support includes training PDP coordinators, preparation of the test matrix containers, delivery of the containers to the NDA equipment, and responsibility for PDP source control. LANS support will be coordinated by the Responsible Division Leader/Designee.

4.14.3 LANS, as custodian of the sources, will provide to CCP the necessary reference sources for calibration in accordance with CCP NDA calibration procedures.

4.15 Waste Sampling and Analysis Methods

4.15.1 If the WIPP Permittees determine that additional characterization is necessary using chemical sampling and analysis, the Permittees shall direct generator/storage site to provide the Permittees with the following documentation:

- Sampling and analysis plan
- U.S. Environmental Protection Agency (EPA) SW-846 test method(s), or functionally equivalent test method(s), to be used
- Identification of the laboratory(ies) that will be performing the test(s)

4.15.2 Upon the Permittees written approval of the sampling and analysis plan, the generator/storage site shall implement the sampling and analysis plan.

4.16 Gas Generation Testing (GGT)

4.16.1 CCP will perform GGT sampling and analysis using GGT canisters in accordance with CCP-TP-083, *CCP Gas Generation Testing,* and CCP-PO-016, *CCP Gas Generation Testing Quality Assurance Project Plan.*

4.17 Flammable Gas Analysis (FGA)

4.17.1 FGA is for transportation only and will be performed using approved DOE/WIPP procedures by personnel trained under the CCP Qualification Program. This includes OSRP containers, as required.

4.17.2 The Operations Center, the CCP LANL Project Manager/Designee, and the CCP VPM will be notified if after completion of the analysis, the containers exceed the facility designated limits.

4.18 Acceptable Knowledge (AK)

4.18.1 CCP records personnel in Carlsbad will maintain the auditable AK record necessary to support the AK Summary Report in accordance with CCP-PO-001, *CCP Transuranic Waste Characterization Quality Assurance Project Plan*, and CCP-QP-008, *CCP Records Management.*

4.18.2 CCP AK personnel collect, compile, and review AK documentation in accordance with CCP-TP-005 and/or DOE/WIPP-02-3214, *Remote-Handled TRU Waste Characterization Program Implementation Plan* (WCPIP).

[A] Host site/generator personnel assist CCP AK personnel with AK collection.

[B] CCP AK personnel and host site/generator personnel will cooperate fully with each other in the sharing and exchange of any and all AK information that is collected for or incorporated into IWMDL or AK Summary Reports.

[C] The Responsible Division Leader/Designee will provide assistance by coordinating potential interviewees for CCP. The Responsible Division Leader/Designee will ensure Competent Host Site/Generator Personnel (CP) are available to serve as an intermediary and an active listener to support effective generator questioning.

4.18.3 CCP AK personnel and Host site/generator personnel develop an IWMDL that includes facility processes, plans, and procedures, waste profile forms, and Waste Compliance and Tracking System records that control the following waste management activities as applicable:

- Waste generating activities
- Waste retrieval activities
- Waste packaging/repackaging
- Waste treatment/processing (e.g., neutralization, deactivation, and solidification/immobilization
- Waste inspection, testing, and characterization
- Decontamination and Decommissioning operations
- Any other activity that changes the physical, chemical, or radiological properties of waste to be characterized by CCP

4.18.4 The AKE develops the new or revised IWMDL in accordance with CCP-TP-005 using the existing body of AK documentation.

[A] The Responsible Division Leader/Designee ensures CP are assigned to review the new or revised IWMDL for accuracy and completeness and provide written comments as appropriate.

[B] The AKE and CP resolve comments and questions.

[C] CCP posts the new revised IWMDL on the CCP secure file transfer protocol (sftp) site.

NOTE
This note applies to step 4.18.5. The activities of step 4.18.5 may be initiated as necessary by the AKE for existing waste streams, new waste streams, or during AK revisions/updates.

4.18.5 AKA are performed in accordance with CCP-TP-005.

[A] SPM provides Responsible Division Leader/Designee with the AKA results.

[B] Responsible Division Leader/Designee distributes results of the AKA to designated CPs for review and comment.

[C] AKE resolves comments with Responsible Division Leader/Designee and CPs.

[D] Responsible Division Leader/Designee concurs with final AKA in writing.

4.18.6 CCP submits new or revised AK Summary Reports to the Responsible Division Leader/Designee for review and concurrence.

[A] The Responsible Division Leader ensures CP review the AK Summary Report for accuracy and completeness providing comments in accordance with CCP-QP-010.

4.18.7 A Host site/generator CP attends a briefing on new or revised AK Summary Reports.

4.18.8 Responsible Division Leader/Designee notifies the SPM and AKE in writing of any new revised waste management activities that would necessitate a change to the IWMDL.

4.18.9 The SPM and AKE evaluate new or revised waste management activities and determine if revision to the IWMDL and/or AK Summary Report is needed.

4.18.10 The Host site will not provide any waste container to CCP for characterization until the AKE has received the latest version of the work document (including field changes, other immediate procedure changes, Timely Orders/Standing Order, Operator Aids, etc.) used to generate, package, and/or repackage the container.

[A] The work document(s) provided to the AKE will contain the following information at a minimum:

- Identification (including revision) of the work document(s) used to generate the container
- Type of activity (e.g., packaging/repackaging only, remediation, treatment)
- Amount (estimated) and type (if known) of liquids
- Type and quantity (estimated) of absorbents used
- Type and quantity (estimated) of neutralization agents used
- Any unexpected conditions or reactions encountered
- General description of waste items
- Packaging configuration (e.g., 55-gallon drum with 20 mil liner bag)
- Filter data including model and quantity used
- Parent container identification

4.18.11 The AKE will ensure they have obtained and reviewed the correct version of IWMDL documentation used to generate/manage a container before adding it to the AK Tracking Spread Sheet.

4.18.12 At a minimum of once per calendar quarter, Responsible Division Leader/Designee will review the current IWMDL and provide written assurance to the CCP SPM that the list is up to date OR provide necessary documentation to revise the list.

4.19 Off-Site Source Recovery Program

4.19.1 OSRP VE and Radiological Characterization will be conducted using certified equipment with personnel trained under the CCP Certified Program.

4.19.2 The OSRP uses a separate procedure for VE and packaging. In addition, it uses AK documentation in combination with calculations, in lieu of NDA.

4.19.3 Prior data for Off-Site Source Recovery (OSR) containers generated under the LANL Certified Program will be evaluated for acceptability into the CCP Certified Program.

[A] The previous BDRs will be reviewed and validated at the CCP Project Office prior to acceptance into the program.

[B] If the data validators at the CCP Project Office are unable to verify the data, the BDRs will not be accepted and will require re-generation under the CCP program.

4.20 CCP Project Office Certification Activities

4.20.1 CCP Project Office certification activities consist of project-level review of BDRs, lot evaluations, data validation, and WIPP Waste Information System/Waste Data System (WWIS/WDS) data entry. CCP Project Office certification activities will be conducted using personnel trained under the CCP Certified Program.

4.20.2 Data validators are responsible for completing the required checklists, resolving comments, and ensuring records are complete.

4.20.3 WWIS/WDS personnel will ensure information is entered into WWIS in accordance with CCP-TP-030, *CCP CH TRU Waste Certification and WWIS/WDS Data Entry,* and CCP-TP-530, *CCP RH TRU Waste Certification and WWIS/WDS Data Entry.*

4.20.4 The Waste Certification Official (WCO) will certify and transmit characterization and certification data using the WWIS/WDS and approved procedures.

4.20.5 The WCO will document and certify that all TRU waste payload containers prepared from the certified process for WIPP meet all of the requirements of DOE/WIPP-02-3214, CCP-PO-001, CCP-PO-002, *CCP Transuranic Waste Certification Plan,* and CCP-PO-003, *CCP Transuranic Authorized Methods For Payload Control (CCP CH-TRAMPAC)* or CCP-PO-505, *CCP Remote-Handled Transuranic Waste Authorized Methods for Payload Control (CCP RH-TRAMPAC).*

4.20.6 The WCO will transmit information to the CCP Records in accordance with CCP-TP-030 and CCP-TP-530.

4.20.7 The WCO will provide the Transportation Certification Official (TCO) with all certification information necessary to certify the payload for transportation.

4.21 Transportation to WIPP

4.21.1 Transportation certification, preparation of the shipment of certified packages (e.g., Transuranic Package Transporter-II [TRUPACT-II], TRUPACT-III, HalfPact, or RH 72-B Cask), and shipment of the waste will be conducted using personnel trained under the CCP Certified Program.

4.21.2 CCP will provide TRUPACT-II, HalfPACT, CH, and RH loading training to LANL employees, as required, to maintain certifications required for transportation activities.

4.21.3 LANL will provide manifesting, marking, labeling and placarding of the shipments in accordance with Title 40 CFR, *Protection of Environment*, Title 49 CFR, *Transportation* requirements, and site-specific procedures.

4.21.4 LANL will verify and ensure that containers being shipped to Radioassay and Nondestructive Testing (RANT) or the loading area do not exceed AB MAR inventory.

4.21.5 LANL will track MAR inventory at RANT onsite, RANT facility, or other loadout facility.

4.21.6 The TCO will inspect the containers and verify that the filter installed on the containers to be shipped meet WIPP requirements and match information submitted during waste certification.

4.21.7 Waste will be loaded and prepared for transport to WIPP in accordance with DOE-approved operating procedures.

4.21.8 The TCO will provide documentation to the Responsible Division Leader/Designee responsible for certifying the waste for shipment in accordance with CCP procedures.

4.22 Remote-Handled (RH) Waste Program

4.22.1 Specific roles and responsibilities will be established for personnel under the CCP RH Program.

4.23 Measurement and Test Equipment (M&TE)

4.23.1 The CCP M&TE Custodian will provide recall notification for CCP M&TE that requires calibration to the CCP LANL Project Manager/Designee. M&TE requiring calibration will include such things as weight scales, infrared thermometers, temperature data-loggers, electronic calibrators, digital readouts, and pressure transducers.

4.23.2 LANS will provide National Institute of Science and Technology - traceable calibration services for specified M&TE. LANS will maintain records on M&TE calibration in accordance with its Qualified Suppliers List (QSL)-accepted program. LANS will provide copies of the Certificates of Calibration for these items of M&TE to the CCP VPM and the CCP M&TE Custodian via the CCP LANL Project Manager/Designee prior to issuing M&TE to CCP for use.

4.23.3 LANS will notify the CCP M&TE custodian when M&TE are added, deleted, found out-of-tolerance/defective or failed calibration by the Host site.

4.24 Procedures

4.24.1 The Responsible Division Leader/Designee will send LANL procedures and waste processing plans that can impact the CCP characterization process as well as requirements specified in DOE/WIPP 02-3122, Transuranic Waste Acceptance Criteria For The Waste Isolation Pilot Plant (WIPP-WAC); Contact-Handled Transuranic Waste Authorized Methods for Payload Control (CH-TRAMPAC); Waste Isolation Pilot Plant Hazardous Waste Facility Permit, Waste Analysis Plan (WIPP-WAP), to the LANL CCP Project Manager/Designee for review by appropriate CCP SMEs.

[A] As warranted, the LANL CCP Project Manager/Designee will provide written comments from the CCP review of LANL documents to the Responsible Division Leader/Designee for resolution.

[B] Responsible Division Leader/Designee will confirm with the LANL CCP Project Manager/Designee that CCP written comments are resolved and that CCP approves the document prior to proceeding with operations under the scope of the document being reviewed.

[C] LANS, at its discretion, may request objective evidence to support the competency of NWP reviewers.

4.24.2 Editorial or minor changes may be made without the same level of review and approval as the original document as defined in CCP-QP-010.

4.24.3 New Technical Operating Procedures (procedures that operate equipment) developed by CCP scheduled to be used at the Host site, shall be evaluated by the Host site Responsible Division Leader/Designee to determine if the procedure shall be added to the Host site review lists defined in step 4.24.5.

4.24.4 All characterization procedures, which physically manipulate the waste (e.g., VE) or the waste container (e.g., RTR or NDA) and all revisions to these procedures, will be provided to the Responsible Division Leader/Designee, by the CCP LANL Project Manager/Designee for review (e.g., USQD, AK evaluation, Health & Safety Review and Implementation), before approval by DOE/CBFO and implementation by CCP.

4.24.5 The Responsible Division Leader/Designee will designate the appropriate reviews of the documents listed below (which do not meet the criteria of step 4.24.2 and do not affect the AB) and forward written comments to CCP Document Control in accordance with CCP-QP-010 for resolution. For operational procedures that CCP is not currently operating to, the Responsible Division Leader/Designee may waive the review until CCP operations commence on site. When CCP operations return to the site, the Responsible Division Leader/Designee will be provided all procedures listed below for review.

CCP Documents:

- CCP LANL AK Summary Reports
- CCP LANL WSPFs

- CCP Interface Waste Management Document Lists
- CCP AKA
- CCP-CM-003, *CCP High Efficiency Neutron Counter (HENC-01) (Equipment #NDA-HENC-01) Equipment Description*
- CCP-CM-005, *CCP High-Efficiency Neutron Counter (HENC) (Equipment #NDA-HENC-03) Equipment Description*
- CCP-CM-018, *CCP Real-Time Radiography MCS Unit #3 LANL Unit #2 (RTR #2) (Equipment #NDE-RTR-03/ LANL-RTR-02) Equipment Description*
- CCP-CM-024, *CCP High Efficiency Neutron Counter (HENC-02) (Equipment #NDA-HENC-02) Equipment Description*
- CCP-CM-028, *CCP Real-Time Radiography LANL Unit #1 (Equipment #LANL-RTR-01)* Equipment Description
- CCP-CM-029, *CCP High Energy Real-Time Radiography System HE-RTR*
- CCP-CM-032, *CCP Super High-Efficiency Neutron Counter (SuperHENC) Equipment Description*
- CCP-PO-016, *CCP Gas Generation Testing Quality Assurance Project Plan*
- CCP-TP-053, *CCP Standard Real-Time Radiography (RTR) Inspection Procedure*
- CCP-TP-054, *CCP Adjustable Center of Gravity Lift Fixture Preoperational Checks and Shutdown*
- CCP-TP-055, *CCP Varian Porta-Test Leak Detector Operations*
- CCP-TP-059, *CCP Operating the Super High Efficiency Neutron Counter (HENC) Using NDA 2000*

- CCP-TP-063, *CCP Operating the High Efficiency Neutron Counter Using NDA 2000*
- CCP-TP-064, *CCP Calibrating the High Efficiency Neutron Counter and the Super High Efficiency Neutron Counter Using NDA 2000*
- CCP-TP-066, *CCP Radiography Screening Procedure for Prohibited Items*
- CCP-TP-068, *CCP Standardized Container Management*
- CCP-TP-069, *CCP Sealed Source Visual Examination and Packaging*
- CCP-TP-076, *CCP Operating the Mobile ISOCS Large Container Counter Using NDA 2000*
- CCP-TP-077, *CCP Calibrating the Mobile ISOCS Large Container Counter Using NDA 2000*
- CCP-TP-078, *CCP LANL Info Scan Radiography Procedure*
- CCP-TP-082, *CCP Waste Container Filter Vent Maintenance and Operation*
- CCP-TP-083, *CCP Gas Generation Testing*
- CCP-TP-086, *CCP CH Packaging Payload Assembly*
- CCP-TP-101, *CCP Off-Site Source Recovery Project Sealed Source Radiological Characterization*
- CCP-TP-103, *CCP Data Reviewing, Validating, and Reporting Procedure for the NDA Counters at LANL Using NDA 2000*
- CCP-TP-107, *CCP Operating the High Efficiency Neutron Counter #3 (HENC #3) Using NDA 2000*
- CCP-TP-108, *CCP Calibrating the High Efficiency Neutron Counter #3 (HENC #3) Using NDA 2000*

- CCP-TP-113, *CCP Standard Contact-Handled Waste Visual Examination*
- CCP-TP-120, *CCP Container Management*
- CCP-TP-121, *CCP RTR #1 Operating Procedure*
- CCP-TP-122, *CCP RTR #2 Operating Procedure*
- CCP-TP-198, *CCP HE-RTR Operating Procedure*

NOTE

This note applies to step 4.24.6. Examples of cognizant personnel may include, but is not limited to SMEs for the following as applicable to the document reviewed:

- Waste generating/packaging/repackaging processes
- Chemical and physical characteristics of waste streams
- Chemical compatibilities
- Radiological properties of waste streams
- Treatment permits
- Nuclear Safety
- Environmental compliance
- Facility operations

4.24.6 Upon receipt of a document listed in step 4.24.5, the Responsible Division Leader/Designee will ensure the document is reviewed by cognizant personnel responsible for the waste management activities relevant to the scope of the document.

4.24.7 As warranted, the Responsible Division Leader/Designee will provide written comments to CCP using Document Review Record in accordance with CCP-QP-010.

4.24.8 CCP, at its discretion, may request objective evidence to support the competency of Host site/generator reviewers.

4.24.9 The LANL CCP Project Manager/Designee will confirm with the Responsible Division Leader/Designee that LANL written comments are resolved and LANL concurrence is provided prior to proceeding with CCP operations under the scope of the document being reviewed.

4.25 Documents/Records

4.25.1 All AK documents generated at LANL must be reviewed prior to release by an Authorized Derivative Classifier (ADC) as detailed in ADC guidance documents.

4.25.2 In addition, any document created by CCP or LANS that is intended for public release must be reviewed and processed for Unclassified Controlled Nuclear Information (UCNI) review and Public Release review prior to release.

4.25.3 Documents listed in steps 4.25.4 and 4.25.5, which are provided from one organization to the other as information copies, may be transmitted via memo, fax, e-mail, or formal correspondence.

4.25.4 Documents to be provided by LANS after completion of ADC review to CCP personnel include copies of the following:

[A] Existing AK documentation including, but not limited to: source documents, spreadsheets, NCR, VE, PID information, and characterization raw data.

[B] Changes to container data information after AK has been collected and/or reconciled.

[C] Any documentation required for CCP to perform its scope of work, including correspondence pertaining to characterization activities.

[D] Radiological dose rate and surface contamination results on waste drums as needed to support WDS data entry.

[E] Copies of calibration certifications for M&TE used by CCP.

4.25.5 Documents to be provided by CCP (No ADC review required) to LANL personnel, as applicable, include copies of the following:

[A] Completed BDRs for all processes.

[B] Copy of WSPF for concurrence.

[C] Copy of AK Summary Reports for concurrence.

[D] Lot Evaluation documentation.

[E] Completion of CCP Training/LOQI updates.

[F] AK Tracking Spreadsheet.

[G] NCRs and WIPP Forms generated.

[H] Other reports generated to support a certified program.

[I] Daily Production Reports.

[J] CCP Interface Waste Management Document Lists.

[K] CCP AKA.

4.25.6 Documents that are generated at LANL during the implementation of the TRU waste characterization and disposal at WIPP will be processed through the CCP Records process in accordance with CCP-QP-008. After completion of all activities, these records will be turned over to LANL at the end of the project.

4.26 Quality Assurance (QA)

4.26.1 All quality affecting work performed in the completion of this waste characterization, certification, and transportation scope will be in compliance with applicable DOE/CBFO-certified CCP procedures.

4.26.2 CCP will conduct periodic QA surveillances to assess compliance with applicable WIPP requirements.

4.26.3 The Host site will conduct surveillances to assess compliance with applicable procedures.

4.27 Procurement

4.27.1 Qualified LANS personnel may procure, inspect, and perform receipt inspection of U.S. Department of Transportation (DOT) Type 7A containers, filters, gases and various non-quality affecting items for certified CCP operations in accordance with LANL procurement requirements.

4.27.2 LANS personnel will perform procurement activities in accordance with its QSL-accepted program.

4.27.3 CCP may procure, inspect, and perform receipt inspection of quality-affecting items (e.g., DOE Type 7A containers, filters, and gases) and various nonquality affecting items for certified operation in accordance with CCP procurement requirements. Quality-related procurements ordered by CCP require a CCP receipt inspection only; they DO **NOT** require a LANL QA receipt inspection. Documentation of these inspections will be made available to the LANS QPA Division Leader/Designee upon request.

4.27.4 All procurements for commodities (e g., Pipe Overpack, and SWB) procured through CBFO's Central Procurement Program (CPP) will require LANL receipt inspection. CPP acceptance is evidenced by the approved data package provided with each shipment.

4.27.5 All HAZMAT packaging procured or leased by CCP or CBFO shall be in accordance with written specification and receipt inspection plans that have been reviewed and approved by LANL Operations Support Packaging and Transportation (OS-PT). These specifications and plans will be provided by OS-PT with the procurement request documents that are provided to CCP or CBFO.

4.28 Notification

4.28.1 The Host site has primary responsibility to notify CCP when there are changes in the Host site facilities used by CCP for characterization activities or changes that may impact operations.

4.28.2 The Host site has primary responsibility to notify CCP when there are changes to policies, processes, or procedures that may affect CCP characterization activities or operations.

4.28.3 The Host site has primary responsibility to notify CCP when repairs or modifications are made to transportation trailers or packaging equipment (TRUPACT-II, HalfPACTs, etc.). CCP will then notify the appropriate cognizant engineer at the WIPP site. The cognizant engineer will verify the modification/repair.

4.28.4 The Host site has primary responsibility to notify CCP of required notifications of various container conditions or changes to the notification requirements.

4.28.5 CCP has primary responsibility to ensure changes to equipment are in accordance with CCP-CM-001, *CCP Equipment Change Authorization and Documentation*.

4.28.6 CCP has primary responsibility to notify the Host site when there are configuration changes to CCP-provided equipment.

4.28.7 CCP has responsibility to notify the Operations Center of various container conditions (e.g., FGE) as identified in the previous sections.

4.29 Occurrence Reporting and Processing System (ORPS) and Price-Anderson Amendments Act (PAAA)

4.29.1 Both LANS and CCP maintain the responsibility for reporting potential PAAA issues resulting from waste certification or safe operation of characterization activities (e.g., Technical Safety Requirements, Radiation Safety, Industrial Safety, Industrial Hygiene, Maintenance, Lockout/Tagout, Conduct of Operations) of TRU waste by CCP at LANL. This includes filing any Occurrence Reporting and Processing System (ORPS) reports resulting from the characterization activities of TRU waste by CCP.

4.29.2 Both LANS and CCP shall invite the other to participate in the investigation of any waste characterization event that results in an ORPS or PAAA report.

4.29.3 Both LANS and CCP shall support and participate in investigations when CCP characterization activities result in an ORPS or PAAA report.

4.29.4 Within CCP, the NWP Compliance Coordinator serves as the PAAA point-of-contact. Within LANS, the PAAA Coordinator for Quality and Performance Assurance Division Office (QPA-DO) acts as the PAAA point-of-contact, with roles and responsibilities in accordance with the Host site program.

4.29.5 In coordination with the CCP LANL Project Manager/Designee and the CCP VPM, the NWP Compliance Coordinator is responsible for notifying the LANS PAAA point-of-contact for any occurrences or conditions related to CCP characterization operations that are an actual or potential noncompliance to the applicable AB, and for any occurrences or conditions that are an actual or potential noncompliance to the CCP Certified Program procedures, implementation of the QA Program (10 CFR Part 830, *Nuclear*

Safety Management) or the Radiation Protection Program (10 CFR Part 835, *Occupational Radiation Protection*) impacting or potentially impacting nuclear safety, or implementation of the Worker Safety and Health Plan (10 CFR Part 851) impacting or potentially impacting personnel safety.

[A] Both parties are responsible for ensuring compliance with their respective programs.

4.29.6 The LANS PAAA point-of-contact will notify the NWP Compliance Coordinator of any PAAA noncompliance with the CCP Certified Program. The CCP LANL Project Manager/Designee is responsible for ensuring that deficiencies identified within the CCP Program are appropriately documented and forwarded to the NWP Compliance Coordinator.

4.30 Authorization Basis (AB) and Configuration Management

4.30.1 The Host site has primary responsibility to ensure that CCP equipment and processes have been appropriately considered within the DOE-approved Host site DSA.

[A] The Host site shall provide to CCP, Host site generated AB documentation concerning CCP related activities and equipment, including USQDs, for CCP's review.

[B] CCP has primary responsibility to control operations and CCP-provided equipment configurations to ensure compliance with CCP and Host site procedures that protect the personnel, the public, and the environment.

[C] For CCP provided equipment, CCP will provide the documentation necessary for the Host site to perform the evaluation against its safety analysis. This documentation may include HSPs, hazard assessments, system descriptions, equipment drawings, or other information deemed necessary through mutual agreement between CCP and the Host site.

[D] For Host site-provided equipment, CCP will review operational and AB documentation, including USQDs, prior to assuming operation of the equipment to ensure the protection of personnel, the public, and the environment.

[E] All changes to equipment operated by CCP will be controlled by the Host site Work Control Program to ensure appropriate AB evaluations are conducted, and associated controls established.

[F] The Host site will make available all changes to AB requirements that affect CCP operations to CCP prior to implementation.

4.31 10 Code of Federal Regulation (CFR) Part 851, *Worker Safety and Health Program*

4.31.1 The requirements of 10 Code of Federal Regulation (CFR) Part 851, *Worker Safety and Health Program* are incorporated at LANL by PD103, *Worker Safety and Health Program.* All work performed by CCP at LANL will be in accordance with PD103, *Worker Safety and Health Program.*

5.0 RECORDS

5.1 Records are generated during the implementation of procedures referenced in this Interface Document. These records are maintained as QA records in accordance with CCP-QP-008. No additional records are generated as a result of this Interface Document.

6.0 OVERSIGHT

NOTE

DOE has delegated the authority to CCP to characterize and certify TRU waste to be shipped to the WIPP. Nonetheless, the Host site retains the responsibility for proper disposal as the waste generator on behalf of DOE. Accordingly, the following actions will define the level of oversight of the CCP by Host site personnel.

6.1 The Host site will accept successful completion of the CBFO certification audit as adequate evidence that the CCP implementation at the Host site is fully compliant with waste disposal requirements as set forth in the CH and RH WAC and WAP. However, the Host site may conduct, at their discretion, periodic surveillances of CCP operations.

6.2 Following successful completion of the CBFO certification audit, the Host site QA will conduct periodic surveillances to ensure CCP work is conducted in accordance with CCP procedures. These surveillances will be conducted in accordance with Host site QA procedures.

6.3 The Host site QA will provide copies of its surveillance reports to the CCP SPM. The CCP SPM and NWP QA will take the following actions:

6.3.1 Review the Host site surveillance reports for any finding or other deficiencies against the CCP scope of work.

6.3.2 Document and perform corrective actions in accordance with applicable NWP issues management procedures.

6.3.3 Provide Host site QA with CCP actions to correct the identified deficiencies.

6.3.4 NWP QA will maintain an information file of the Host site surveillance reports conducted on the CCP scope of work.

Attachment 1 – Acronyms and Key Definitions

AB	Authorization Basis
ADC	Authorized Derivative Classifier
ADEP	Associate Directorate of Environmental Programs
ADESH	Associate Directorate, Environment, Safety and Health
ADPSM	Associate Directorate Plutonium Science and Manufacturing
AK	Acceptable Knowledge
AKA	Acceptable Knowledge Assessment
AKE	Acceptable Knowledge Expert
BDR	Batch Data Report
CBFO	Carlsbad Field Office
CCP	Central Characterization Program
CFR	Code of Federal Regulations
CH	Contact-Handled
CP	Cognizant personnel
CPP	Central Procurement Program
DOE	U.S. Department of Energy
DOT	U.S. Department of Transportation
DSA	Documented Safety Analysis
EA	Expert Analyst
ES&H	Environment, Health, and Safety Plan
FGA	Flammable Gas Analysis
FGE	Fissile Gram Equivalent
FOD	Facility Operations Director
GGT	Gas Generation Testing
HENC	High Efficiency Neutron Counter
Host Site	LANS
IPCT	Integrated Process Control Team
Interface Agreement	An agreement between the CCP and LANL for defining the responsibilities associated with WIPP requirements defined in the reference documents identified in Section 2.1 of the Interface Document.
IWD	Integrated Work Documents
IWMDL	Interface Waste Management Document List
LANL	Los Alamos National Laboratory
LANS	Los Alamos National Security
LO/TO	Lockout/Tagout
LOQI	List of Qualified Individuals
MAR	Material at Risk
M&TE	Measurement and Test Equipment
nCi/g	nanocuries per gram
NCR	Nonconformance Report
NDA	Nondestructive Assay
NDE	Nondestructive Examination

Attachment 1 – Acronyms and Key Definitions (Continued)

NPI	Nuclear Process Infrastructure
NWP	Nuclear Waste Partnership
OJT	On-The-Job-Training
ORPS	Occurrence Reporting and Processing System
OS-PT	Operations Support Packaging and Transportation
OSR	Off-Site Source Recovery
OSRP	Off-Site Source Recovery Program
PAAA	Price-Anderson Amendments Act
PE-Ci	Plutonium Equivalent Curies
PDP	Performance Demonstration Program
PID	Prohibited Item Disposition
PMP	Performance Management Plan
QA	Quality Assurance
QPA-DO	Quality and Performance Assurance Division Office
QSL	Qualified Suppliers List
RANT	Radioassay and Nondestructive Testing
RCRA	Resource Conservation and Recovery Act
RH	Remote-Handled
RLM	Responsable Line Manager
RMA	Radioactive Materials Area
RTR	Real-time radiography
RWP	Radiation Work Permit
SDS	Safety Data Sheet
sftp	secure file transfer protocol
SHENC	Super High Efficiency Neutron Counter
SME	Subject Matter Expert
SPM	Site Project Manager
STR	Subcontract Technical Representative
SWB	Standard Waste Box
TA	Technical Area
TCO	Transportation Certification Official
TLD	Thermoluminescent Dosimeters
TRAMPAC	Transuranic Authorized Methods for Payload Control
TRU	Transuranic
TRUPACT	Transuranic Package Transporter
TRUPACT-II	Transuranic Package Transporter Model II
TRU Waste	Waste containing more than 100 nanocuries (nCi) of alpha emitting Transuranic isotopes per gram of waste with half-lives >20 years (for payload containers)
TSCA	Toxic Substances Control Act
TSR	Technical Safety Requirements
UCNI	Unclassified Controlled Nuclear Information
USQD	Unreviewed Safety Question Determination

Attachment 1 – Acronyms and Key Definitions (Continued)

VE	Visual Examination
VPM	Vendor Project Manager
WAC	Waste Acceptance Criteria
WCO	Waste Certification Official
WCPIP	*Remote-Handled TRU Waste Characterization Program Implementation Plan*
WCRRF	Waste Characterization, Reduction, and Repackaging Facility
WIPP	Waste Isolation Pilot Plant
WIPP Requirements	Requirements contained in references identified in documents contained in Section 2.1 of the Interface Document
WSPF	Waste Stream Profile Form
WWIS/WDS	WIPP Waste Information System/Waste Data System

Attachment 2 – Reference Documents (For Information Only)

DOE Carlsbad Documents:

- *Waste Isolation Pilot Plant Hazardous Waste Facility Permit, Waste Analysis Plan*
- DOE/CBFO-94-1012, *U.S. Department of Energy Carlsbad Field Office Quality Assurance Program Document*
- DOE/WIPP-02-3214, *Remote-Handled TRU Waste Characterization Program Implementation Plan*
- DOE/WIPP-02-3122, *Transuranic Waste Acceptance Criteria For The Waste Isolation Pilot Plant*
- DOE/CBFO-01-1005, *Performance Demonstration Program Plan for Nondestructive Assay of Drummed Wastes for the TRU Waste Characterization Program*
- DOE/CBFO-95-1076, *Performance Demonstration Program Plan For Analysis Of Simulated Headspace Gases*

First-Tier Coordination Documents:

- *Statement of Work for Characterization of LANL TRU Waste (Contact Handled and Remote Handled)*
- FTA-WFM-023, *Agreement between FWO-Waste Facility Management*
- *First-Tier Coordination Documents for the RH TRU Waste Characterization Program Implementation Plan*

First-Tier Certification Documents:

- WP 13-1, Nuclear Waste Partnership LLC, *Quality Assurance Program Description*
- CCP-PO-001, *CCP Transuranic Waste Characterization Quality Assurance Project Plan*
- CCP-PO-002, *CCP Transuranic Waste Certification Plan*
- CCP-PO-003, *CCP Transuranic Authorized Methods For Payload Control (CCP CH-TRAMPAC)*

Attachment 2 – Reference Documents (For Information Only) (Continued)

- CCP-PO-505, *CCP Remote-Handled Transuranic Waste Authorized Methods for Payload Control (CCP RH-TRAMPAC)*

Lower-Tier Documents:

- CCP-AK-LANL-004, *Central Characterization Program Acceptable Knowledge Summary Report For Los Alamos National Laboratory TA-50 Mixed Transuranic Waste, Waste Streams: LA-MIN03-NC.001, LA-CIN02.001, LA-MHD09.001*
- CCP-AK-LANL-006, *Central Characterization Program Acceptable Knowledge Summary Report For Los Alamos National Laboratory TA-55 Mixed Transuranic Waste, Waste Streams: LA-MHD01.001, LA-CIN01.001, LA-MIN02-V.001, LA-MIN04-S.001*
- CCP-AK-LANL-008, *Central Characterization Project Acceptable Knowledge Summary Report For Los Alamos National Laboratory Off-Site Source Recovery Project Sealed Sources, Waste Streams: LA-OS-00-01.001, LA-OS-00-03, and LA-OS-00-04*
- CCP-AK-LANL-009, *Central Characterization Program Acceptable Knowledge Summary Report For Los Alamos National Laboratory Chemistry and Metallurgy Research (CMR) Facility, Waste Streams: LA-MHD03.001, LA-CIN03.001, LA-MIN05-V.001*
- CCP-AK-LANL-010, *Central Characterization Program Acceptable Knowledge Summary Report For Los Alamos National Laboratory TA-21 DP West Facility Waste Streams: LA-MHD04.001, LA-MSG04.001, LA-CIN04.001*
- CCP-AK-LANL-012, *Central Characterization Program Acceptable Knowledge Summary Report for Los Alamos National Laboratory TA-48 Alpha Facility Waste Stream: LA-MHD08.001*
- CCP-AK-LANL-013, *Central Characterization Program Acceptable Knowledge Summary Report for Los Alamos National Laboratory Lovelace Respiratory Research Institute Waste Stream: LA-MHD05-ITRI.001*
- CCP-CM-001, *CCP Equipment Change Authorization and Documentation*
- CCP-CM-003, *CCP HighEfficiency Neutron Counter (HENC-01) (Equipment #NDA-HENC-01) Equipment Description*
- CCP-CM-005, *CCP High-Efficiency Neutron Counter (HENC) (Equipment #NDA-HENC-03) Equipment Description*

Attachment 2 – Reference Documents (For Information Only) (Continued)

Lower-Tier Documents (Continued):

- CCP-CM-018, *CCP Real-Time Radiography MCS Unit #3 LANL Unit #2 (RTR #2) (Equipment #NDE-RTR-03/LANL-RTR-02) Equipment Description*
- CCP-CM-024, *CCP High-Efficiency Neutron Counter (HENC-02) (Equipment #NDA-HENC-02) Equipment Description*
- CCP-CM-028, *CCP Real-Time Radiography LANL Unit #1 (Equipment #LANL-RTR-01) Equipment Description*
- CCP-CM-032, *CCP Super High-Efficiency Neutron Counter (SuperHENC) Equipment Description*
- CCP-PO-005, *CCP Conduct of Operations*
- CCP-PO-006, *CCP Conduct of Operations Matrix*
- CCP-PO-012, *CCP/Los Alamos National Laboratory (LANL) Interface Document*
- CCP-PO-016, *CCP Gas Generation Testing Quality Assurance Project Plan*
- CCP-PO-026, *CCP Configuration Management*
- CCP-QP-001, *CCP Graded Approach*
- CCP-QP-002, *CCP Training and Qualification Plan*
- CCP-QP-005, *CCP TRU Nonconforming Item Reporting and Control*
- CCP-QP-008, *CCP Records Management*
- CCP-QP-010, *CCP Document Preparation, Approval, and Control*
- CCP-QP-016, *CCP Control of Measuring and Testing Equipment*
- CCP-QP-022, *CCP Software Quality Assurance Plan*
- CCP-QP-040, *Support Training*

Attachment 2 – Reference Documents (For Information Only) (Continued)

Lower-Tier Documents (Continued):

- CCP-TP-001, *CCP Project Level Data Validation and Verification*
- CCP-TP-002, *CCP Reconciliation of DQOs and Reporting Characterization Data*
- CCP-TP-005, *CCP Acceptable Knowledge Documentation*
- CCP-TP-030, *CCP CH TRU Waste Certification and WWIS/WDS Data Entry*
- CCP-TP-033, *CCP Shipping of CH TRU Waste*
- CCP-TP-053, *CCP Standard Real-Time Radiography (RTR) Inspection Procedure*
- CCP-TP-054, *CCP Adjustable Center of Gravity Lift Fixture Preoperational Checks and Shutdown*
- CCP-TP-055, *CCP Varian Porta-Test Leak Detector Operations*
- CCP-TP-059, *CCP Operating the Super High Efficiency Neutron Counter (HENC) Using NDA 2000*
- CCP-TP-063, *CCP Operating the High Efficiency Neutron Counter Using NDA 2000*
- CCP-TP-064, *CCP Calibrating the High Efficiency Neutron Counter and the Super High Efficiency Neutron Counter Using NDA 2000*
- CCP-TP-066, *CCP Radiography Screening Procedure for Prohibited Items*
- CCP-TP-068, *CCP Standardized Container Management*
- CCP-TP-069, *CCP Sealed Source Visual Examination and Packaging*
- CCP-TP-076, *CCP Operating the Mobile ISOCS Large Container Counter Using NDA 2000*
- CCP-TP-077, *CCP Calibrating the Mobile ISOCS Large Container Counter Using NDA 2000*
- CCP-TP-082, *CCP Waste Container Filter Vent Maintenance and Operation*

Attachment 2 – Reference Documents (For Information Only) (Continued)

Lower-Tier Documents (Continued):

- CCP-TP-083, *CCP Gas Generation Testing*
- CCP-TP-086, *CCP CH Packaging Payload Assembly*
- CCP-TP-101, *CCP Off-Site Source Recovery Project Sealed Source Radiological Characterization*
- CCP-TP-103, *CCP Data Reviewing, Validating, and Reporting Procedure for the NDA Counters at LANL Using NDA 2000*
- CCP-TP-107, *CCP Operating the High Efficiency Neutron Counter #3 (HENC #3) Using NDA 2000*
- CCP-TP-108, *CCP Calibrating the High Efficiency Neutron Counter #3 (HENC #3) Using NDA 2000*
- CCP-TP-113, *CCP Standard Contact-Handled Waste Visual Examination*
- CCP-TP-120, *CCP Container Management*
- CCP-TP-121, *CCP RTR #1 Operating Procedure*
- CCP-TP-122, *CCP RTR #2 Operating Procedure*
- CCP-TP-198, *CCP HE-RTR Operating Procedure*
- CCP-TP-506, *CCP Preparation of the Remote-Handled Transuranic Waste Acceptable Knowledge Characterization Reconciliation Report*
- CCP-TP-507, *CCP Shipping of Remote-Handled Transuranic Waste*
- CCP-TP-530, *CCP RH TRU Waste Certification and WWIS/WDS Data Entry*
- DOE/WIPP 02-3183, *CH Packaging Program Guidance*
- DOE/WIPP 02-3184, *CH Packaging Operations Manual*
- DOE/WIPP 02-3220, *CH Packaging Operations for High-Wattage Waste*
- DOE/WIPP 02-3283, *RH Packaging Program Guidance*

Attachment 2 – Reference Documents (For Information Only) (Continued)

Lower-Tier Documents (Continued):

- DOE/WIPP 02-3284, *RH Packaging Operations Manual*
- DOE/WIPP 02-3285, *RH Packaging Maintenance Manual*
- DOE/WIPP 06-3345, *Waste Isolation Pilot Plant Flammable Gas Analysis*
- WP 08-PT.13 *RH-TRU 72-B Cask Uprighting Trailer Operation and Maintenance Manual*
- WP 15-GM1002, *Issues Management Processing of WIPP Forms*

Attachment 3 – LANS Host Site Required Documents (For Information Only)

Upper-Tier LANL Documents:

- Integrated Work Management, P 300
- Verification of Readiness to Start Up or Restart LANL Nuclear Facilities, Activities, and Operations, P 115
- Procedure for Pause/Stop Work, P 101-18
- Cryogens, P 101-5
- Lockout/Tagout for Hazardous Energy Control, P 101-3
- Personal Protective Equipment, P 101-6
- Cranes, Hoists, Lifting Devices, and Rigging Equipment, P 101-25
- Emergency Management, PD 1200-1
- Waste Management , P 409
- LANL Packaging and Transportation Program Procedure P 151-1
- Integrated Safeguards and Security Management, SD 200
- Nuclear Material Control and Accountability, PD 205
- Performance Improvement from Abnormal Events , P 322-3
- Fire Protection Program, PD 1220
- Radiation Protection, P 121

Lower-Tier LANL Documents:

- EP-DIR-AP-10001, *ADEP Document Control*
- EP-PLAN-3201, *TA-54 Health and Safety Plan*
- PD 1022, *Review and Release of Scientific and Technical Information*
- P204-2, *Classified Matter Protection and Control Handbook*

- Attachment 3 – LANS Host Site Required Documents (For Information Only) (Continued)

Federal Documents

- 10 CFR Part 830, *Nuclear Safety Management*
- 10 CFR Part 835, *Occupational Radiation Protection*
- 10 CFR Part 851, *Worker Safety and Health Program*
- Title 40 CFR, *Protection of Environment*
- Title 49 CFR, *Transportation*

Figure 1. CCP-LANL Communications Flow Chart

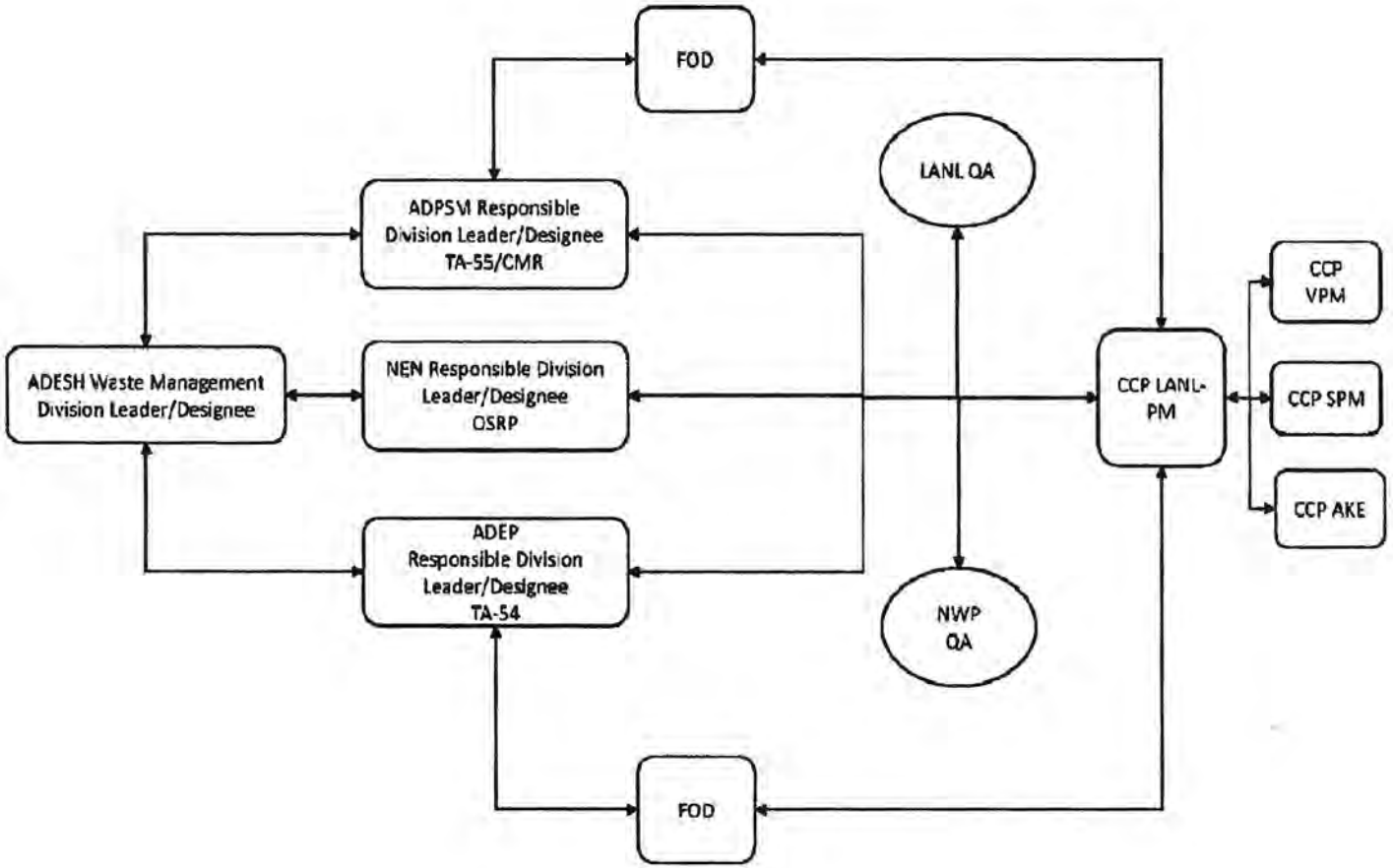

Figure 2. Nuclear Waste Partnership – LANL

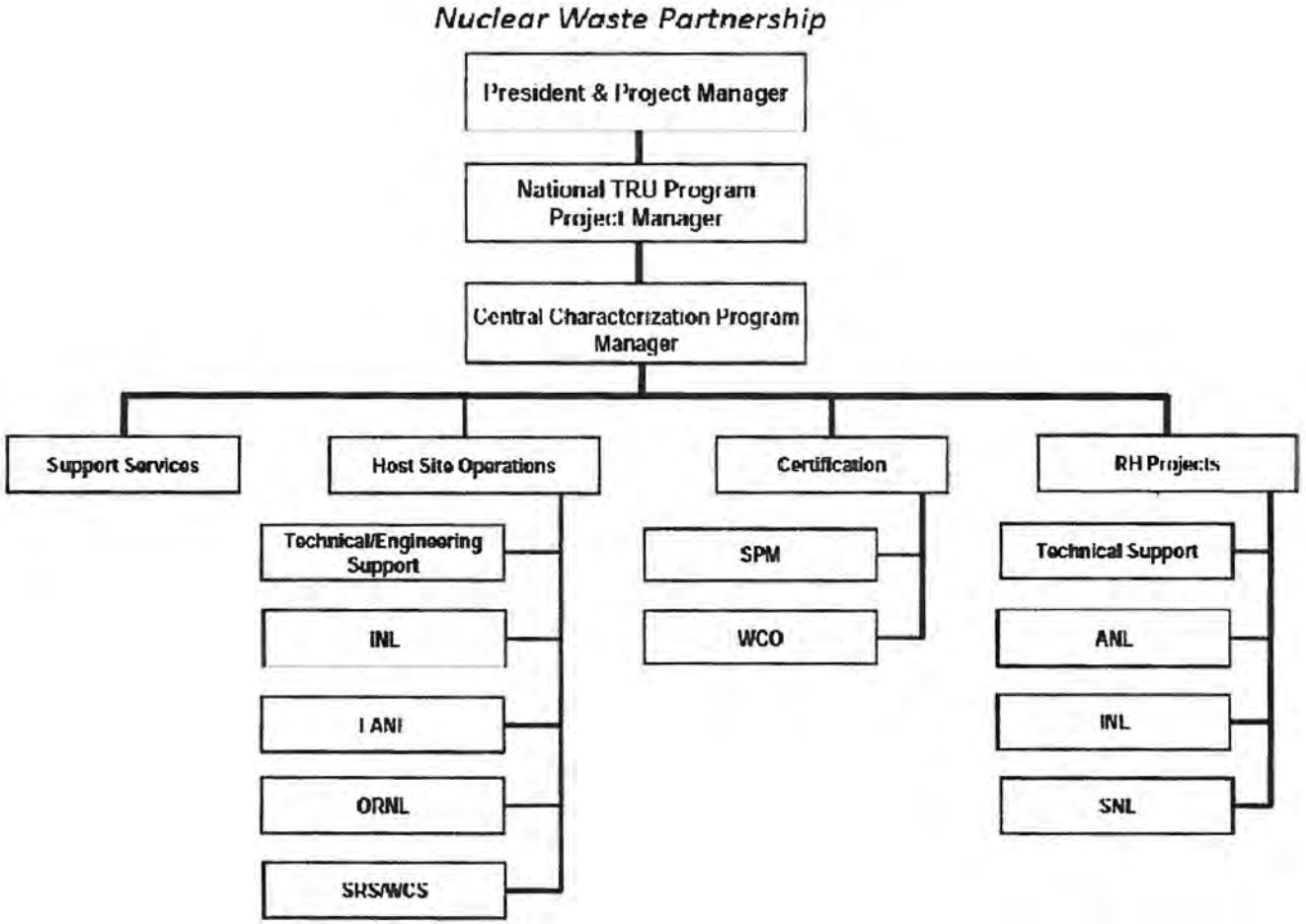

Figure 3. Environmental Programs

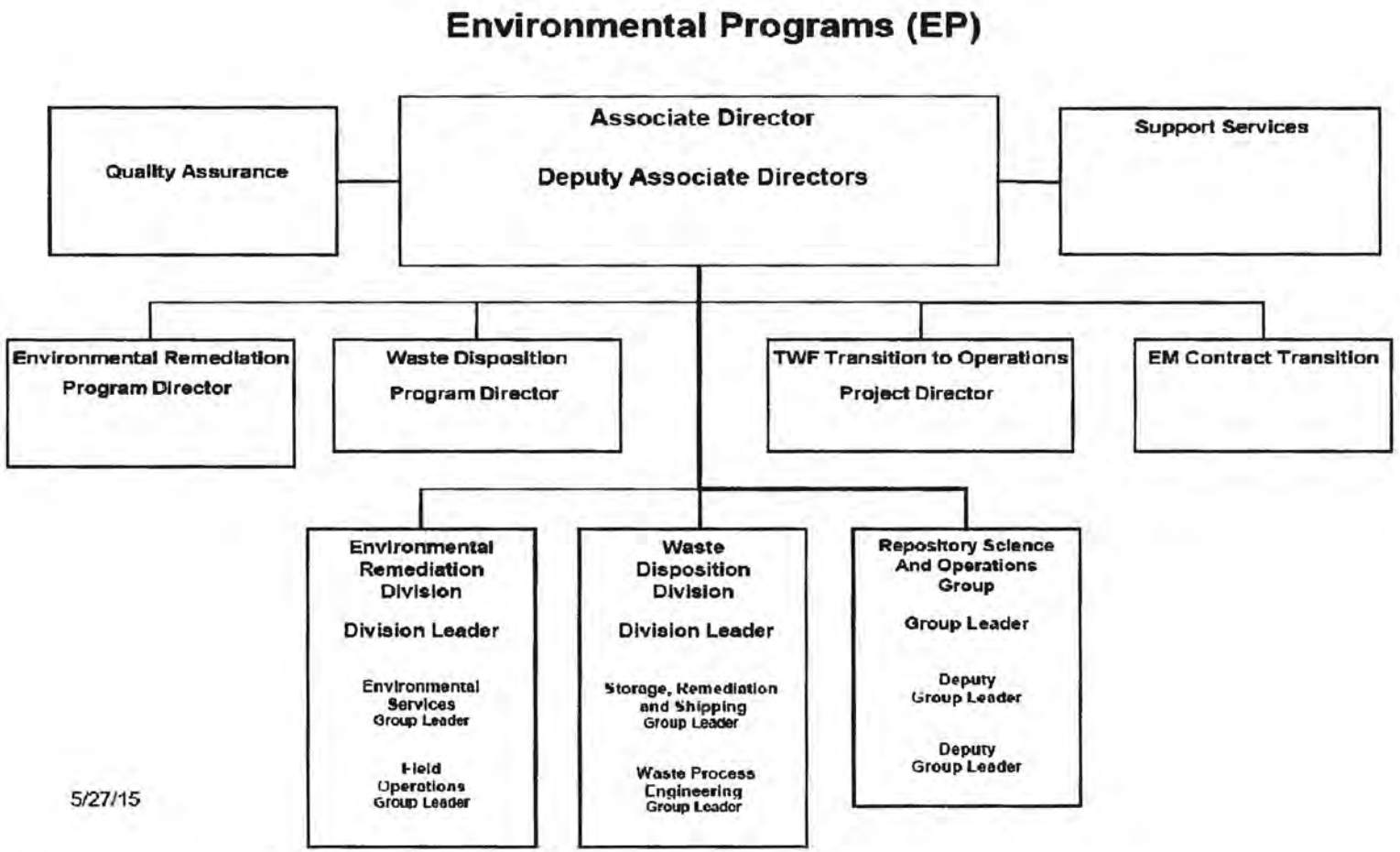

Figure 4. ADPSM: Nuclear Process Infrastructure

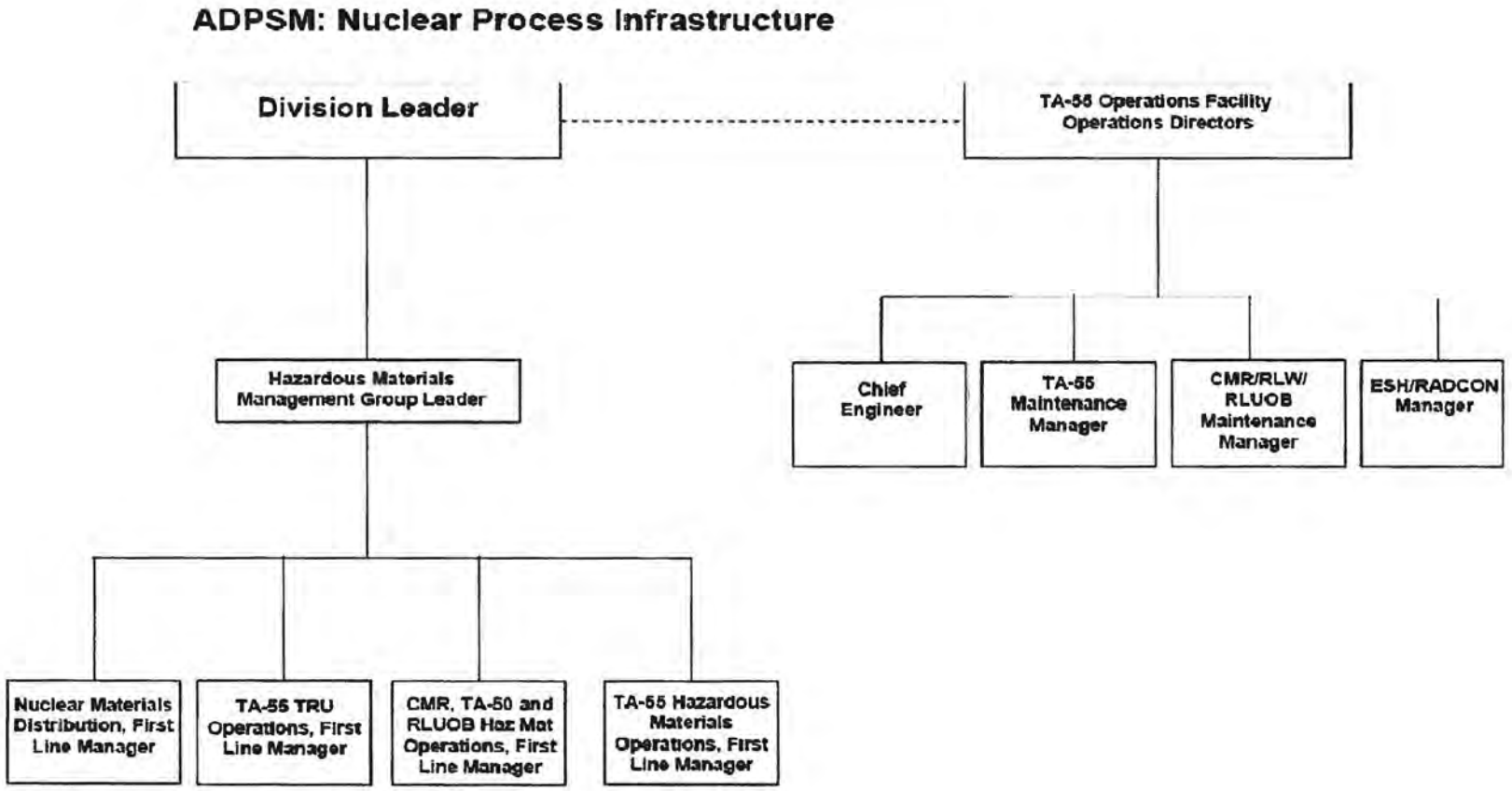

Figure 5. NEN Nuclear Nonproliferation Division