INFORMATION ONLY

CCP-PO-012

Revision 15

CCP/Los Alamos National Laboratory (LANL) Interface Document

EFFECTIVE DATE: 01/23/2014

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.

TABLE OF CONTENTS

1.0 PURPOSE 6
1.1 Scope 6

2.0 REQUIREMENTS 9
2.1 Acronyms and Key Definitions 9
2.2 Criteria 9

3.0 RESPONSIBILITIES 10
3.1 CCP LANL Project Manager/Designee 10
3.2 LANS LTP Director/Designee 11
3.3 Environmental Waste Management Operations (EWMO) Facilities Operations Director (FOD)/Designee 11
3.4 CCP Site Project Manager (SPM) 12
3.5 NWP Assurance Programs Manager 12
3.6 CCP Vendor Project Manager (VPM)/Designee 13
3.7 LTP Production Control Manager 14
3.8 LTP Shipping and Safe Storage Manager (SSS-PM) 14
3.9 LANL LTP Source Custodian. 16
3.10 LANL Industrial Hygiene Support 16

4.0 INTERFACE 17
4.1 Initial Setup for Operations 17
4.2 Routine Operations 17
4.3 Training 21
4.4 Employee Monitoring 22
4.5 Container Management 23
4.6 Deficiencies 24
4.7 Visual Examination (VE), Repackaging, and Prohibited Item Disposition (PID) 25
4.8 Filter Inspection/Filter Changeout 25
4.9 Prescreen Nondestructive Examination (NDE) 25
4.10 Prescreen Nondestructive Assay (NDA) 26
4.11 Nondestructive Examination (NDE) 26
4.12 Nondestructive Assay (NDA) 26
4.13 Source Control 28
4.14 Waste Sampling and Analysis Methods 28
4.15 Gas Generation Testing (GGT) 29
4.16 Flammable Gas Analysis (FGA) 29
4.17 Acceptable Knowledge (AK) 29
4.18 Off-Site Source Recovery Program 30
4.19 CCP Project Office Certification Activities 30
4.20 Transportation to WIPP 31
4.21 Remote-Handled (RH) Waste Program 32

4.22 Measurement and Test Equipment (M&TE) 32
4.23 Procedures 33
4.24 Documents/Records 35
4.25 Procurement 37
4.26 Oversight 38
4.27 Notification 38
4.28 Occurrence Reporting and Processing System (ORPS) and Price-Anderson Amendments Act (PAAA) 39

5.0 RECORDS 41

LIST OF ATTACHMENTS

Attachment 1 – Acronyms and Key Definitions 42
Attachment 2 – Reference Documents 45
Attachment 3 – LANS Host Site Required Documents 50
Attachment 4 – LANL Responsibilities Crosswalk 52

LIST OF FIGURES

Figure 1. Nuclear Waste Partnership – LANL 53
Figure 2. Waste Disposition Project 54

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 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 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 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 site may augment CCP characterization efforts as required by CCP.

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. LANS is responsible for supervising and overseeing the implementation of LANS' ES&H Plan, 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' requirement related to environmental compliance and waste management.

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 4.2.5. LANL TRU Program (LTP) 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 except for the NWP Assurance Programs Manager (See Figure 1, 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 Directorate.

This document applies to all personnel identified on the detailed LANS/CCP organization charts shown in Figure 1 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 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
- 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 Acronyms and Key Definitions

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

2.2 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

NOTE

The titles for LANL personnel delineated in the Responsibilities section are specific to LTP 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/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.

3.1.7 Receives reports of LANS oversight activities from Environmental Waste Management Operations (EWMO) Facility Operations Director (FOD) 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.

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.

3.2 LANS LTP Director/Designee

3.2.1 Ensures LTP completes performance measures/metrics as established by DOE/Los Alamos Site Office (LASO).

3.2.2 Functions as the point of contact with CCP LANL Project Manager for coordination and review of CCP procedures, plans, waste stream profile forms, and configuration management documents.

3.2.3 Interfaces with DOE/CBFO through the DOE/LASO.

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

3.2.5 Requests resources to implement the integrated schedule for TRU waste.

3.3 Environmental Waste Management Operations (EWMO) Facilities Operations Director (FOD)/Designee

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

3.3.2 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.

3.3.3 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.

3.3.4 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.

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

3.3.6 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.

3.4 CCP Site Project Manager (SPM)

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

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

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

3.4.4 Provides evidence to the CCP LANL Project Manager/Designee and LTP Director of the Performance Demonstration Program (PDP) participation and successful completion for each operating system.

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

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

3.4.7 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.

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

3.5 NWP Assurance Programs Manager

3.5.1 Reports to the Nuclear Waste Partnership (NWP) QA Manager to maintain functional authority and independence from cost and schedule considerations.

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

3.5.3 Validates Nonconformance Reports (NCRs).

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

3.5.5 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.

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

3.5.7 Provides assistance in generation, disposition, and closure of NCRs and Corrective Action Reports (CARs).

3.5.8 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.

3.6 CCP Vendor Project Manager (VPM)/Designee

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

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

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

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

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

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

3.6.7 Works in conjunction with LTP Production Control Manager to manage the control, movement, and tracking of waste containers through the CCP characterization process.

3.6.8 Coordinates with the EWMO TRU Waste Operations, 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.

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

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

3.6.11 Ensures that new addition to and/or modifications made to CCP-provided facilities and/or equipment are submitted to EWMO as soon as practicable and approvals are received prior to implementation.

3.7 LTP Production Control Manager

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

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

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

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

3.7.5 Generates and submits regular, periodic production reports.

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

3.8.1 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.

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

3.8.3 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.

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

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

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

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

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

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

3.8.10 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.

3.8.11 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.

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

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

3.8.14 Provides Industrial Hygiene support for characterization and transportation operations.

3.8.15 Participates in Readiness Assessments or surveillances, as required.

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

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

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

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

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

3.9 LANL LTP Source Custodian.

3.9.1 Maintains nuclear material source control in accordance with LANS requirements.

3.10 LANL Industrial Hygiene Support

3.10.1 Responsible for workplace monitoring to include, as applicable, monitoring for volatile organic compounds, noise, cryogenics, beryllium, asbestos, and other hazardous materials.

3.10.2 Responsible for Occupational Safety and Health Administration (OSHA) 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.

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 Division Leader prior to implementation.

4.2.1 General Conditions of Operation

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

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

[C] CCP personnel will STOP WORK and will notify Host site supervision and the CCP VPM in the event of a safety concern (e.g., TSR violation, PAAA violation, breached container, emergency, injury).

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

[E] Authorization Basis (AB) and Configuration Management

[E.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.

[E.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.

[E.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.

[E.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.

[E.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.

[E.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.

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

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

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

[E] Disposition NCRs and CARs as required, and communicate progress to the CCP LANL Project Manager/Designee and LTP Project Director.

[F] **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] Ensure that equipment calibration is performed on CCP operated equipment, in accordance with Section 4.22.

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

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

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

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

[N.1] When new chemicals are to be used, the MSDS will be provided to EWMO FOD prior to use to ensure that the Chemical Inventory requirements are updated.

4.2.3 SSS-PM 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 equipment and provide an approved survey report to the NDA Team Leader or NDE 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.

4.2.4 CCP personnel will work under the SSS-PM requirements for LO/TO.

4.2.5 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.

4.2.6 CCP personnel will operate in accordance with CCP-PO-005.

4.2.7 CCP personnel with assistance from LANS industrial hygiene (IH) Safety will develop IWDs or other applicable documents for all CCP activities performed at LANL in accordance with LANS policies and submitted to the SSS-PM Team Lead for approval.

4.3 Training

4.3.1 Personnel will be trained and qualified to WIPP requirements in accordance with CCP-QP-002, *CCP Training and Qualification Plan*. CCP-QP-040, *Support Training,* 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.

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

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

4.3.3 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

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

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

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

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

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

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

4.3.10 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.

4.4 Employee Monitoring

4.4.1 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.

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

4.4.3 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 as soon as is reasonably possible.

4.4.4 LANS Radiological Controls 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.

4.4.5 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 within 21 days of the removal of the filter from the sampler head, in any monitored area routinely occupied by CCP personnel.

4.5 Container Management

4.5.1 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*.

4.5.2 LANS is responsible for providing documented information to the CCP SPM/designee on any modification to the drum or container after the AK has been completed by CCP.

4.5.3 The CCP SPM/designee will review the documented information for modified containers and will notify the LTP Production Controls Manager when the containers are approved for entrance into the characterization process.

4.5.4 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.

4.5.5 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.

4.5.6 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.

4.5.7 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*.

4.6 Deficiencies

4.6.1 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.

4.6.2 The CCP LANL Project Manager/Designee will notify the LTP Production Controls Manager of nonconformances by the distribution of NCRs. The LTP Production Controls Manager 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.

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

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

4.6.5 The QA will confirm appropriate closure of deficiencies.

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

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

4.7.2 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.

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

4.8 Filter Inspection/Filter Changeout

4.8.1 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.

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

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

4.9 Prescreen Nondestructive Examination (NDE)

4.9.1 CCP personnel will perform prescreening for NDE to identify potentially certifiable containers that can be sent to NDE, 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 Manager.

4.10 Prescreen Nondestructive Assay (NDA)

4.10.1 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 LTP Production Controls Manager.

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

4.11 Nondestructive Examination (NDE)

4.11.1 NDE will be performed by personnel trained under the CCP Certified Program.

4.11.2 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 Operators will notify the Operations Center if containers are found to contain compressed gas cylinders.

4.11.3 If a container is found during NDE 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 of the drum 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.

4.11.4 CCP NDE Operators may provide additional interpretation of scans to support other LANS repackaging activities as determined by LANS and agreed to by the CCP LANL Project Manager/designee.

4.12 Nondestructive Assay (NDA)

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

4.12.2 **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.

[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.

4.12.3 **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 of waste exceeding 200 FGE (measured value).

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

[C] Individual SWBs of waste exceeding 325 FGE (measured value).

4.12.4 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.

4.12.5 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 to LANL for repackaging.

4.12.6 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 to LANS.

4.12.7 LANS will provide/refill the dewar required for the liquid nitrogen for NDA.

4.13 Source Control

4.13.1 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.

4.13.2 LANS will provide support for the participation in the NDA PDP. This support includes training PDP coordinators, preparation of the test matrix drums, delivery of the drums to the NDA equipment, and responsibility for PDP source control. LANS support will be coordinated by the LTP Production Control Manager.

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

4.14 Waste Sampling and Analysis Methods

4.14.1 If the 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
- 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)

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

4.15 Gas Generation Testing (GGT)

4.15.1 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.*

4.15.2 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.*

4.16 Flammable Gas Analysis (FGA)

4.16.1 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.

4.16.2 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 following:

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

[B] >6.4% Hydrogen

[C] >16,000 ppm Methane

4.17 Acceptable Knowledge (AK)

4.17.1 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*.

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

4.17.3 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*.

4.17.4 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.

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

4.18 Off-Site Source Recovery Program

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

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

4.18.3 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.

4.19 CCP Project Office Certification Activities

4.19.1 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.

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

4.19.3 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*.

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

4.19.5 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)*.

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

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

4.20 Transportation to WIPP

4.20.1 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.

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

4.20.3 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.

4.20.4 LANL will verify and ensure that drums being shipped to RANT or the loading area do not exceed AB MAR inventory.

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

4.20.6 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.

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

4.20.8 The TCO will provide documentation to the LTP Production Coordination Manager certifying the waste for shipment in accordance with CCP procedures.

4.21 Remote-Handled (RH) Waste Program

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

4.22 Measurement and Test Equipment (M&TE)

4.22.1 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.

4.22.2 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.

4.22.3 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.

4.23 Procedures

4.23.1 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.

4.23.2 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 LTP Production Control Manager to determine if the procedure shall be added to the Host facility review lists defined in step 4.23.4.

4.23.3 All characterization procedures, which physically manipulates the waste (e.g., VE) or the waste container (e.g., NDE or NDA) and all revisions to these procedures, will be provided to the EWMO FOD, SSS-PM, LTP Project Director, 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.

4.23.4 The LTP Project Director, EWMO FOD/designee, CCP LANL Project Manager/Designee will review or designate the appropriate reviews of the procedures listed below (which do not meet the criteria of step 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.

CCP Procedures:

- AK Summary Reports
- CCP-CM-003, *CCP High Efficiency Neutron Counter (HENC-01) (Equipment #NDA-HENC-01) 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-028, *CCP Real-Time Radiography LANL Unit #1 (Equipment #LANL-RTR-01)* Equipment Description
- CCP-CM-024, *CCP High Efficiency Neutron Counter (HENC-02) (Equipment #NDA-HENC-02) 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 (SuperHENC) 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 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-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-103, *CCP Data Reviewing, Validating, and Reporting Procedure for the NDA Counters at LANL 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

4.23.5 The LANS LTP Director and the EWMO FOD will confirm that written comments from LANS are resolved prior to proceeding with operations.

4.24 Documents/Records

4.24.1 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*.

4.24.2 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*.

4.24.3 Documents listed in steps 4.24.4 and 4.24.5, which are provided from one organization to the other as information copies, may be transmitted via memo, fax, e-mail, or formal correspondence.

4.24.4 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 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.

4.24.5 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 generated.

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

[I] Daily Production Reports.

4.24.6 Documents that are generated during the implementation of the 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 the end of the project.

4.25 Procurement

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

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

4.25.3 CCP may procure, inspect, and perform receipt inspection of quality-affecting items (e.g., DOE Type 7A drums, 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 EWMO-QA Manager upon request.

4.25.4 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.

4.25.5 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.

4.26 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.

4.26.1 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.

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

4.26.3 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.

4.26.4 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.

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

4.26.6 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.

4.27 Notification

4.27.1 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.

4.27.2 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.

4.27.3 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.

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

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

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

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

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

4.28.1 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.

4.28.2 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.

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

4.28.4 Within CCP, the NWP Compliance Coordinator serves as the PAAA point-of-contact. Within LANS, the PAAA Coordinator for EWMO Division acts as the PAAA point-of-contact, with roles and responsibilities in accordance with the Host site program.

4.28.5 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 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.

4.28.6 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.

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.

Attachment 1 – Acronyms and Key Definitions

AB	Authorization Basis
ADC	Authorized Derivative Classifier
AK	Acceptable Knowledge
BDR	Batch Data Report
CAR	Corrective Action Report
CBFO	Carlsbad Field Office
CCP	Central Characterization Program
CFR	Code of Federal Regulations
CH	Contact-Handled
DOE	U.S. Department of Energy
DOT	U.S. Department of Transportation
DSA	Documented Safety Analysis
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
HSP	Health and Safety Plan
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 2.2 of the Interface Document.
IWD	Integrated Work Documents
LANL	Los Alamos National Laboratory
LANS	Los Alamos National Security
LASO	Los Alamos Site Office
LIR	Laboratory Implementation Requirements
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

Attachment 1 – Acronyms and Key Definitions (Continued)

NIST	National Institute of Science and Technology
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
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
RMA	Radioactive Materials Area
RWP	Radiation Work Permit
sftp	secure file transfer protocol
SOW	Statement of Work
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)
TWOM	TRU Waste Operations Manager
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
WCRRF	Waste Characterization, Reduction, and Repackaging Facility
WIPP	Waste Isolation Pilot Plant
WIPP Requirements	Requirements contained in references identified in documents contained in Section 2.2 of the Interface Document
WSPF	Waste Stream Profile Form
WWIS/WDS	WIPP Waste Information System/Waste Data System

Attachment 2 – Reference Documents

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 (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 Program 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*

- 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*

- 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-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*

Attachment 2 – Reference Documents (Continued)

Lower-Tier Documents (Continued):

- 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*
- 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*

Attachment 2 – Reference Documents (Continued)

Lower-Tier Documents (Continued):

- 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 (SuperHENC) 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-082, *CCP Waste Container Filter Vent Operation*
- 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*

Attachment 2 – Reference Documents (Continued)

Lower-Tier Documents (Continued):

- 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*
- 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 08PT.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

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
- Integrated Safeguards and Security Management, SD 200
- Nuclear Safeguards, PD205
- 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 (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*
- *Real Time Radiography (RTR) Quick Scan Operations*

Attachment 4 – LANL Responsibilities Crosswalk

TA-54	TA-55
LANS LTP Director/Designee	Nuclear Process Infrastructure (NPI) Division Leader
Environmental Waste Management Operations (EWMO) Facilities Operations Director/Designee	TA-55 Facility Operations Director
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. Nuclear Waste Partnership – LANL

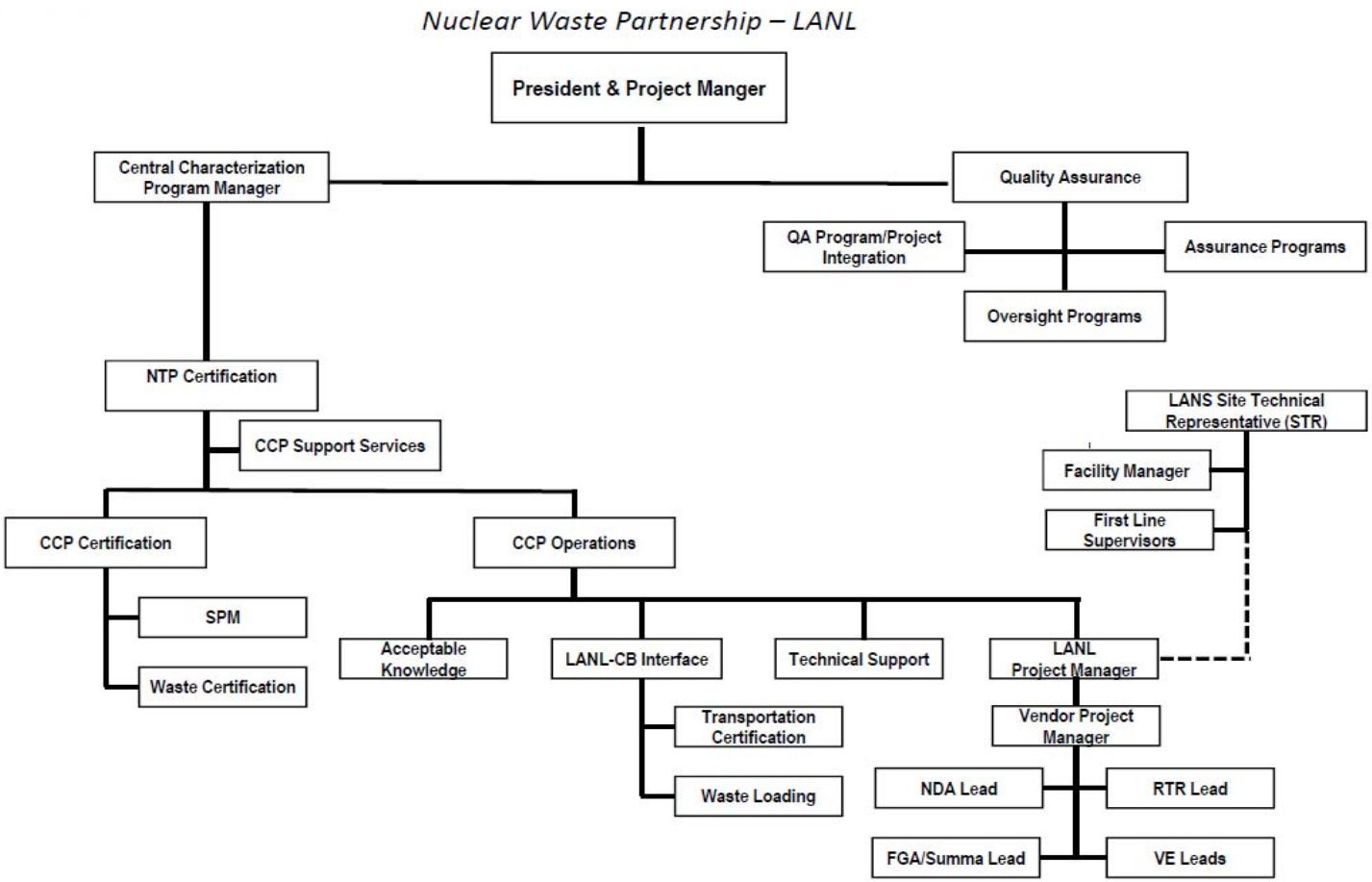
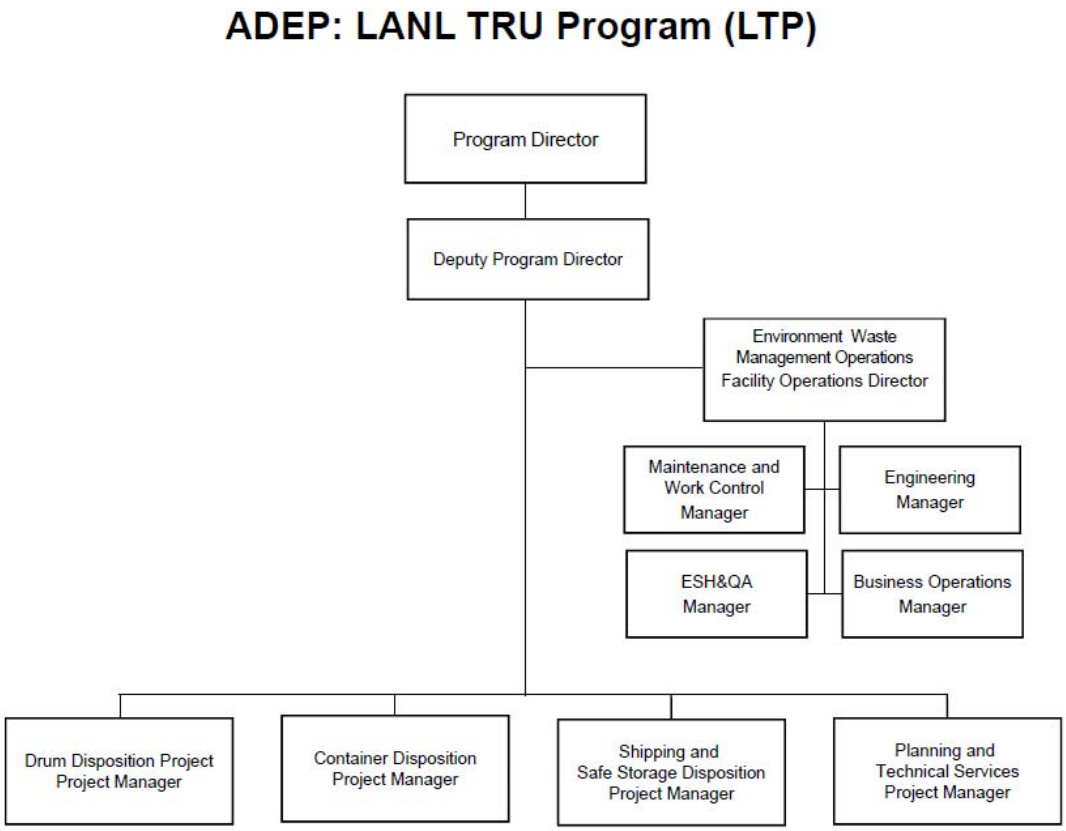
Figure 2. Waste Disposition Project