

U. S. Department of Energy
Carlsbad Field Office

MANAGEMENT PROCEDURE

CBFO MP 4.10, Rev. 1

Effective: 8 Aug 2005

Expires: 8 Aug 2007

SUBJECT: THE PROCESSING OF TRU WASTE SITE DOCUMENTS

Manager, Carlsbad Field Office: Signature on File

Date

8/5/05

1.0 PURPOSE

The purpose of this procedure is to define the process, responsibilities, and controls for the Carlsbad Field Office (CBFO) review of transuranic (TRU) waste site documents, and required document submittals to the regulatory authorities.

2.0 SCOPE

This procedure specifies the methods for the processing of new or revised TRU waste site documents and details document requirements for submittals to regulatory authorities. This document supersedes Management Procedure (MP) 4.10, Revision 0.

3.0 REFERENCES AND DEFINITIONS

3.1 References

- DOE CBFO *Quality Assurance Program Document (QAPD)*, CBFO-94-1012
- CBFO Management Procedure (MP) 4.2, *Document Review*
- CBFO MP 10.3, *Audits*
- 40 CFR Part 194, *Criteria for the Certification and Re-certification of the Waste Isolation Pilot Plant's Compliance with the 40 CFR Part 191 Disposal Regulations*
- WIPP Hazardous Waste Facility Permit (HWFP), NM 489013088-TSDF

3.2 Definitions

Adequacy - Addresses the flow-down or incorporation of requirements from upper tier program documents into implementing procedures.

TRU Waste Site Program Documents – These site documents consist of:

Quality Assurance Project Plans (QAPjPs)

Waste Certification Plans (WCPs)

TRUPACT-II Authorized Methods for Payload Control (TRAMPAC) or other approved programmatic documents related to other transportation conveyances

TRAMPAC Quality Assurance Plan (QAP)

Site QAPs

The Quality Assurance Program Plan (QAPP) for the Gas Generation Test Plan (GGTP)

- **TRU Waste Site Documents** – Site documents including TRU waste site program documents and site procedures.

4.0 **RESPONSIBILITIES**

- 4.1 CBFO Office of Characterization and Transportation (OCT) Director, or designee
 - 4.1.1 Ensure that technical review and approval of TRU waste site documents is performed, as applicable.
 - 4.1.2 Receive TRU waste site documents or document changes that have been submitted to CBFO.
 - 4.1.3 Determine if changes to site documents affect data quality or performance criteria and are therefore reportable to a regulatory authority, and identify the delegated reviewers.
 - 4.1.4. Submit a monthly summary report to the New Mexico Environment Department (NMED) for changes to certified TRU waste site documents that affect data quality or performance criteria as identified during the previous month.
 - 4.1.5 Assign OCT resources, as applicable, to review and approve proposed TRU waste site document revisions.
 - 4.1.6 Transmit review comments or the document approval to the TRU waste site.
 - 4.1.7 Submit approved changes to TRU waste site QAPjPs to the NMED.
 - 4.1.8 Maintain this procedure.
- 4.2 CBFO Quality Assurance Manager
 - 4.2.1 Ensure that quality assurance (QA) reviews are conducted of TRU waste site documents, as applicable.
 - 4.2.2 Assign QA resources to review changes to QA documents for quality adequacy.

5.0 **PROCEDURE**

- 5.1 TRU Waste Sites Program Document Approval Process
 - 5.1.1 The CBFO OCT Director (or designee) receives TRU waste site document(s) through the OCT email account and enters the item(s) into the tracking system.

- 5.1.2 The OCT Director or designee evaluates submittals to:
- A. Determine if changes to a certified document are justified
 - B. Determine if a change to a certified document is reportable to the NMED.
 - C. Identify and assign resources to review proposed TRU waste site document revisions or new documents.

NOTE: Any revised or new process procedures requiring Environmental Protection Agency (EPA) or NMED approval prior to acceptance of waste at WIPP will require an adequacy review by the assigned audit team member. Approval of these procedures will be achieved upon site submittal through the audit process described in MP 10.3, *Audits*. Accepted processes include, but are not limited to, nondestructive assay (NDA), visual examination (VE), VE technique, radiography, headspace gas (HSG), WIPP Waste Information System (WWIS) or acceptable knowledge (AK), and Performance Demonstration Program (PDP).

- 5.1.3 The OCT Director, or designee, will forward the following TRU waste site documents to the CBFO QA Manager for review: QAPjPs, WCPs, TRAMPACs, GGTP QAPPs, graded approach procedures, and QAPs.
- 5.1.4 The assigned reviewers perform document, technical, and quality reviews for adequacy, completeness, correctness, and inclusion of and compliance with the requirements established by the Hazardous Waste Facility Permit, the Contact-Handled Waste Acceptance Criteria for the Waste Isolation Pilot Plant (DOE/WIPP-02-3122), applicable TRAMPACs and other approved transportation requirements documents, the Remote-Handled TRU Waste Characterization Program Implementation Plan (DOE/WIPP-02-3214), the QAPD, or other applicable approved requirements documents. Document review includes the consideration of previous assessment results, trends, corrective actions, effectiveness, and ancillary information (information from other sources such as industry or other DOE organizations, clarifications, and regulating bodies), as applicable.
- 5.1.5 The assigned document reviewers shall review the documents and procedures, record their comments on a Document Review Record (DRR) (see MP 4.2, *Document Review*), and return the review comments to the OCT Director or designee to ensure that review status is updated.
- 5.1.6 The OCT Director or designee ensures that comments are consolidated, and that review status is current.
- 5.1.7 The OCT Director or designee transmits comments, if any, to the TRU waste site through email. If there are no comments, the OCT Director or designee transmits approval to the DOE TRU Manager at the site, with a copy to the Site Project Manager.
- 5.1.8 For documents with comments, the OCT Director or designee may schedule and conduct an online comment resolution session, as necessary.
- 5.1.9 Upon receipt of the revised document, the OCT Director or designee transmits approval of the applicable document to the DOE TRU Manager at the site, with a copy to the Site Project Manager and the WIPP Facility Operating Record.
- 5.1.10 The OCT Director or designee prepares and transmits a monthly summary to NMED, with a copy to the WIPP Facility Operating Record, of reportable WAP-related document changes that have been identified during the previous month.

5.1.11 The OCT Director or designee transmits newly approved revisions of the TRU waste sites' QAPjPs to the NMED.

6.0 RECORDS

Document approvals (see 5.1.9) and the monthly summary report of changes (see 5.1.10) will be forwarded to the WIPP Facility Operating Record. No QA records are generated by implementation of this procedure.