

U. S. Department of Energy
Carlsbad Field Office

MANAGEMENT PROCEDURE

CBFO MP 4.14, Rev. 0

Effective: 30 January 2007

Expires: 30 January 2009

SUBJECT: CBFO Review of Acceptable Knowledge Sufficiency Determination Requests

Manager, Carlsbad Field Office: Original Signature on File

Date: **30 January 2007****1.0** **PURPOSE**

The purpose of this procedure is to provide the Carlsbad Field Office (CBFO) personnel with the mechanism for the review and approval of Acceptable Knowledge (AK) Sufficiency Determination Requests from generator sites.

2.0 **SCOPE**

This procedure specifies the methods for processing AK Sufficiency Determination Requests from generator sites.

3.0 **REFERENCES**

- 3.1 Waste Isolation Pilot Plant (WIPP) Hazardous Waste Facility Permit Waste Analysis Plan
- 3.2 CBFO Management Procedure (MP) 4.2, *Document Review*

4.0 **RESPONSIBILITIES**

- 4.1 CBFO Manager or designee
 - 4.1.1 Provisionally approve or deny the AK Sufficiency Determination Request.
 - 4.1.2 Transmit the AK Sufficiency Determination Request to the New Mexico Environment Department (NMED), accompanied by the CBFO provisional approval.
 - 4.1.3 Ensure that a link to the AK Sufficiency Determination Request transmitted to NMED is posted on the WIPP Home Page.
- 4.2 CBFO Office of National TRU Program (ONTP) Director or designee
 - 4.2.1 Determine completeness of the AK Sufficiency Determination Request.
 - 4.2.2 Determine technical adequacy of the AK Sufficiency Determination Request.
 - 4.2.3 Document the review process in accordance with MP 4.2, *Document Review*.
 - 4.2.4 Submit comments to the originator if the request is either incomplete or technically inadequate.
 - 4.2.5 Recommend to the CBFO Manager either approval or denial of the request once the request is complete and technically adequate.

AVAILABLE ONLINE AT:<http://bellview/cbfo/procedures/ProcedureManualTOC/htm>**INITIATED BY:**

TRU Waste Certification Work Coordinator

5.0 **PROCEDURE**

5.1 Completeness Determination

5.1.1 The ONTP Director or designee reviews (using the Completeness Checklist [Attachment 1]) the AK Sufficiency Determination Request (Request) to:

- A. Determine the Scenario under which the Request is submitted.
- B. Determine if the Request is complete using the Completeness Checklist.
 - If the Request is complete (i.e., all questions answered yes or N/A) the ONTP Director or designee signs and dates the attachment and proceeds to step 5.2.
 - If the Request is not complete, the ONTP Director or designee shall record the comments on a Document Review Record (DRR) in accordance with MP 4.2, *Document Review* and submit the DRR to the generator site and exit this procedure.

5.2 Technical Adequacy Determination

5.2.1 Once the Request is deemed complete, the ONTP Director or designee reviews the Request for technical adequacy using the Adequacy Checklist (Attachment 2) and the WIPP Waste Analysis Plan.

- A. If the Request is technically adequate, (i.e., all questions answered yes or N/A) the ONTP Director or designee signs and dates the attachment and proceeds to step 5.3.
- B. If the Request is not complete, the ONTP Director or designee shall record the comments on a DRR in accordance with to MP 4.2, *Document Review* and submit the DRR to the generator site.
- C. Comments shall be resolved in accordance with the requirements of MP 4.2, *Document Review*. When possible, comments will be resolved using the interactive on-line review process.

5.3 After completeness determination and technical adequacy determination have been completed, the ONTP Director or designee shall recommend to the CBFO Manager that the Request be provisionally approved.

5.4 The CBFO Manager shall make the final determination regarding the provisional approval or denial of the Request.

5.5 The CBFO Manager shall transmit the provisional approval, the Request, and all relevant information to NMED (and copies to the WIPP Operating Record) for evaluation and approval.

5.6 Within five days of transmittal, the CBFO Manager or designee will ensure that the link to the transmittal letter on the WIPP Home Page has been posted and inform those on the e-mail notification list.

5.7 Upon receipt of NMED's determination of the Request, the CBFO Manager or designee shall:

5.7.1 If approved by NMED, transmit final approval to the requesting generator site.

- 5.7.2 If inadequate, attempt to resolve the inadequacies with the generator site and provide resolution to NMED.
- 5.7.3 If resolution is not resolved to NMED's satisfaction, the CBFO Manager may seek dispute resolution, as specified in the Hazardous Waste Facility Permit, Module I.

6.0 RECORDS

Records generated by this procedure will be maintained in compliance with current requirements identified in records management procedures for QA records. Record packages should contain:

- Completed and signed Attachment 1
- Completed and signed Attachment 2
- DRRs generated during the review process
- Recommendation to CBFO Manager
- CBFO Manager determination transmittal
- NMED Approval (if applicable)

7.0 ATTACHMENTS

Attachment 1. Completeness checklist

Attachment 2. Technical Adequacy checklist

ATTACHMENT 1. AK SUFFICIENCY DETERMINATION REQUEST COMPLETENESS CHECKLIST FOR WASTE STREAM ID: _____

Completeness Requirement		Yes	No	N/A	Comments	
Does the request contain:	Identification of the scenario for which the approval is sought?					
	A complete AK summary?					
Does the AK Summary contain:	An Executive Summary?					
	A Waste Stream Identification Summary to include:	Demonstration that the waste stream has been properly delineated				
		Demonstration that the waste stream meets the Permit definition of waste stream				
	Program Information to include:	Facility location				
		Facility description				
		Facility mission				
		Defense waste assessment				
		Spent nuclear fuel and high-level waste assessment				
		Description of waste generating processes				
		Research/development (as necessary)				
		Facility support operations (as applicable)				
		Types and quantities of TRU waste generated				
		Correlation of waste streams to buildings/processes				
		Waste identification and categorization				
		Physical form identifiers				
		Waste stream information to include:	Area and building of generation			
	Waste stream volume					
	Period of generation					
	For newly generated waste, the rate and quantity of waste to be generated					
	Waste generating activities					
Types of waste generated						
Material input related to physical form						

ATTACHMENT 1 CONT. AK SUFFICIENCY DETERMINATION REQUEST COMPLETENESS CHECKLIST FOR WASTE STREAM ID: _____

Completeness Requirement			Yes	No	N/A	Comments
Does the AK Summary contain (cont.):	Waste stream information to include (cont.):	Identification of percentage of each waste material parameter in the waste stream				
		Chemical content information including hazardous constituents and hazardous waste identification				
		Prohibited item content				
		Waste packaging				
		Presence of filter vents				
		Number of layers of confinement				
	Types of supporting information gathered					
	Container specific data (if available and relevant)					
A complete reference list including:	Mandatory information					
	Supporting information					
An AK roadmap (defined as a cross reference between mandatory programmatic and mandatory waste stream information)						
	References supporting these requirements					
A complete reference list including:	Mandatory information					
	Supporting information					
Relevant supporting information for the required programmatic and waste stream data addressed in the AK summary						
Identification of any mandatory requirements supported only by upper tier documents						
Description or other means of demonstrating that the AK process described in the Permit was followed						
Information showing that the generator/storage site has developed a written procedure for compiling the AK information and assigning hazardous waste numbers as required by the Permit						
Information showing that the generator/storage site has assessed the AK process						

 Print Name

 Signature

 Date

ATTACHMENT 2. AK SUFFICIENCY DETERMINATION REQUEST TECHNICAL ADEQUACY CHECKLIST for Waste Stream ID: _____

Technical Requirement	Sufficient			Comments
	Y	N	N/A	
Does the Determination Request include all information specified in Permit Attachment B4, Section B4-3d?				
Does the AK Summary identify the relevant hazardous constituents, and does it correctly identify all toxicity characteristics and listed hazardous waste numbers?				
Are all hazardous waste number assignments substantiated by supporting data and, if not, does this lack of substantiation compromise the interpretation?				
Have any data discrepancies between different AK sources been resolved and are those resolutions technically correct and documented?				
Did the AK Summary include the identification of waste material parameter weights by percentage of the material in the waste stream, and were these determinations technically correct?				
Were all prohibited items specified in the treatment, storage, and disposal facility waste acceptance criteria (TSDF-WAC) addressed, and were any conclusions drawn technically adequate and substantiated by supporting information?				
If the AK record included process control information that was specified in Permit Attachment B4, Section B4-3b, did the information include procedures, waste manifests, or other documentation demonstrating that the controls were adequate and sufficient?				
Did the site provide the supporting information necessary to substantiate their technical conclusions within the Determination Request, and was this information correctly interpreted?				

 Print Name

 Signature

 Date