Revision 11

Underground Transuranic Mixed Waste Disposal Area Inspections

Technical Procedure

EFFECTIVE DATE: 01/26/09

Mark Dziamski APPROVED FOR USE

CONTINUOUS USE PROCEDURE

WP	05-WH1810
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INTRODUCTION^{1, 2, 3, 4}

This procedure provides guidance for performing inspections of Underground (U/G) Transuranic (TRU) Mixed Waste Disposal Areas.

The following quality assurance records are generated as a result of performing this procedure:

- Attachment 1, Preoperational Underground TRU Mixed Waste Disposal Area Inspections
- Attachment 2, Preoperational Waste Handling Mode Checklist

REFERENCES

BASELINE DOCUMENTS

- Title 40 Code of Federal Regulations (CFR) Part 264, Subpart I, "Use and Management of Containers"
- 40 CFR §264.15, "General Inspection Requirements"
- 40 CFR Part 761, Subpart C, "Marking of PCBs and PCB Items"
- Hazardous Waste Facility Permit, Waste Isolation Pilot Plant, Permit No. NM4890139088-TSDF, issued by the New Mexico Environment Department
- 00CD-0001, WIPP Mine Ventilation Plan

REFERENCED DOCUMENTS

- WP 04-AD3001, Facility Mode Compliance
- WP 04-AU1007, Underground Openings Inspections
- WP 04-IM1000, Issues Management Program Processing of WIPP Forms
- EA04AD3001-2-0, Facility TSR Administrative Controls Checklist CH Waste Handling Mode
- EA04AD3001-4-0, Return to Storage or Standby Modes Upon Completion of Waste Handling
- EA04IM1000-1-0, WIPP Form

PRECAUTIONS AND LIMITATIONS

- Only personnel qualified as Waste Handling Technician/Engineer, (WHT/WHE), or trainees operating under direct supervision of a qualified WHT/WHE, are authorized to perform activities specified in this procedure.
- Adequate ventilation must be verified before proceeding beyond boundary.

PREREQUISITE ACTIONS

- 1.0 Review previous inspection results for outstanding Action Requests (ARs) and outstanding deficiencies.
- 2.0 If a required inspection goes delinquent, perform the following:
 - 2.1 Immediately notify Site Environmental Compliance (SEC) of the delinquent inspection.
 - 2.2 Schedule and complete the inspection.
 - 2.3 Document the following in a letter to SEC within five working days:
 - The schedule for inspection
 - The reason(s) why inspection was not performed
 - Any measures taken to offset negative impacts resulting from not performing the inspection
 - Actions to prevent further delinquencies
- 3.0 SEC, **GO TO** WP04-IM1000, and initiate a WIPP Form, EA04IM1000-1-0.

PERFORMANCE

- 1.0 PREOPERATIONAL UNDERGROUND TRU MIXED WASTE DISPOSAL AREA INSPECTIONS (ATTACHMENT 1)
 - 1.1 **IF** personnel are to be working in an active U/G TRU Mixed Waste Disposal Area,
 - **THEN**, at the start of shift, inspect areas per Attachment 1, as follows:
 - 1.1.1 Enter date and time of inspection in appropriate blocks.
 - 1.1.2 Inspect the applicable item/condition listed on Attachment 1 AND enter check (✓) for satisfactory items/conditions, U for any unsatisfactory items/conditions, N/A for not inspected, OR actual value required.

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- 1.1.3 Initial applicable block.
- 1.1.4 **IF** any item/condition is unsatisfactory, **THEN** perform the following:
 - Describe exact location and nature of deficiency in Remarks section.
 - Notify WHE.
 - Initiate and record AR for corrective action, as applicable.
- 1.1.5 Inspector, enter printed name, signature, and initials on Attachment 1 when inspection completed.
- 1.1.6 Inspector, mark "N/A" for any unused block on Attachment 1.
- 1.2 Submit inspection sheet to Reviewer upon completion of Preoperational Inspection.
- 2.0 REVIEW
 - 2.1 Reviewer, perform the following:
 - 2.1.1 Review Attachment 1 for unsatisfactory conditions, corrective actions taken, and outstanding or newly generated ARs.
 - 2.1.2 Enter initials in block provided for specific day.
 - 2.1.3 Upon completion of last inspection documented, forward Attachment 1 to WHE for validation.
- 3.0 PREOPERATIONAL WASTE HANDLING MODE CHECKLIST (ATTACHMENT 2)
 - 3.1 Operator, after equipment preoperational checks are completed, perform the following:
 - 3.1.1 Verify date has been entered.
 - 3.1.2 Initial the applicable block.
 - 3.1.3 Performer, enter printed name, signature, and initials on Attachment 2, when preoperational checks are completed.
 - 3.1.4 After all applicable blocks are completed, notify surface WHE for mode. Initial block and enter time.
 - 3.1.5 WHE, complete applicable block of EA04AD3001-2-0, and deliver to Central Monitoring Room Operator (CMRO), either by hand or fax (234-6049).

3.1.6	WHE, upon completion of Waste Handling activities for shift,
	complete applicable block of EA04AD3001-4-0, and deliver to
	CMRO, either by hand or fax (234-6049).

3.1.7 Upon completion of last preoperational mode checklist, forward Attachment 2 to WHE for validation.

4.0 VALIDATION

- 4.1 WHE, perform the following:
 - 4.1.1 Upon completion of last inspection on Attachment 1 and 2, verify correctness of form. Validate inspection(s) by printing name, signing, and dating inspection sheet in spaces provided.
 - 4.1.2 Review Attachments 1 and 2 weekly and forward completed attachments to Records Coordinator.

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Attachment 1 - Preoperational Underground TRU Mixed Waste Disposal Area Inspections

PREOPERATIONAL U/G TRU MIXED WASTE DISPOSAL AREA INSPECTION								
	DATE							
	TIME							
U/G Work Area Ground Control Inspection satisfactory in accordance with WP 04- AU1007	√/U*							
Room ventilation rate (minimum 35,000 scfm/42,000 acfm)	Rate (scfm/ acfm)							
No evidence of adverse health/safety conditions	√/U*							
Unobstructed access to exposed face of emplaced containers	√/U*							
Area free of debris	√/U*							
No evidence of spills/leaks from containers	√/U*							
Adjacent mine pager phones operational	√/U*							
U/G phone system operational	√/U*							
Warning signs posted	√/U*							
PCB warning signs posted on radiological boundary at the entrance and exhaust side to Active Disposal Room.	√/U*							
PERFORMER INITIALS	xxxxxx							
REVIEWER INITIALS	xxxxxx							

* $\sqrt{}$ = Satisfactory **U** = Unsatisfactory **N/A** = Not Inspected

Performers enter:

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Attachment 1 - Preoperational Underground TRU Mixed Waste Disposal Area Inspections						
REMARKS:						
VALIDATION:		/	1			
	WHE (Print Name)	Signature	Date			

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Attachment 2 - Preoperational Waste Handling Mode Checklist

PREOPERATIONAL WASTE HANDLING MODE CHECKLIST							
Date							
52-H-008A Transporter							
52-H-008B Transporter							
52-H-008C Transporter							
52-H-033 6 Ton Forklift							
52-H-126 6 Ton Forklift							
52-H-127 6-Ton Forklift							
52-H-007C 6-Ton Forklift							
Loron/Harder Push/Pull Devices							
Underground Area Inspection							
Deliver EA04AD3001-2-0 to CMRO requesting WH Mode WHE/time							
✓ = Satisfactory	N/A = Not app	olicable	DOS = Out of Service				

Remarks:

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Attachment 2 - Preoperational Waste Handling Mode Checklist

Performers enter:				Performers enter:			
Printed Name	Signature	Initials		Printed Name	Signature	Initials	
WHE Validation:				/		/	
Printed Name		Signature			Date		