

Radioactive Waste Acceptance Program (RWAP) Update



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National Security Technologies (NSTec), LLC
Nevada Test Site (NTS) Generator Workshop
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Nevada Test Site Waste Acceptance Criteria (NTSWAC) Rev. 7

- Is it out yet?
- Implementation in 60 days



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NTSWAC, Rev. 7

- Revision was prompted by waste generator reviews coordinated by Bonnie Spencer
 - Led to reviews by Nevada Site Office, State of Nevada Division of Environmental Protection, RWAP and Disposal Operations personnel
- Reviews resulted in approximately 150 comments
- Majority of comments identified the need to clarify current requirements (a few new requirements)
- All ***musts*** have been replaced with ***shalls***



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Changes in NTSWAC Rev. 7

- Section 2.0, Approval Process
 - Document submittals (to whom/how)
 - Waste Certification Program Plan vs. Quality Assurance Plan
 - Annual review of NTSWAC Implementation Crosswalk (NIC)
 - Waste profile revisions



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Changes in NTSWAC Rev. 7

(continued)

- Section 3.1 General Waste Form Criteria
 - 3.1.3 Greater Than Class C (GTCC): removed
 - 3.1.6 Particulates: container types clarified
 - 3.1.12 Explosives: redefined
 - 3.1.13 Pyrophorics: removed first sentence
 - 3.1.15 Asbestos: clarified “Regulated”
 - 3.1.18 Classified: clarified “**MLLW**”
 - 3.1.19 Hydrocarbon Burdened **LLW**: new, applies to Nevada Site Office generators only



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LLW = Low-Level Waste
MLLW = Mixed Low-Level Waste

Changes in NTSWAC Rev. 7

(continued)

- Section 3.1 General Waste Form Criteria (cont.)
 - 3.1.11 **PCBs**: new requirements
 - **LLW** containing PCBs that meet the requirements for disposal in a permitted hazardous waste landfill **shall** be segregated into a separate waste stream and profiled and packaged separately from other waste streams.
 - **Shall** also meet the requirements listed in Section 3.3.5 and 3.3.6.
 - Notification requirements in 40 CFR 761.61 for PCB remediation waste



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PCBs = Polychlorinated Biphenyls

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Changes in NTSWAC Rev. 7

(continued)

- Section 3.2 Waste Package Criteria
 - 3.2.2 Package Activity Limitations: clarified and table removed
 - 3.2.3 Closure
 - 3.2.5 Strength: requirement remains
 - 3.2.6 Handling: clarified
 - 3.2.7 Size: clarified



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Changes in NTSWAC Rev. 7

(continued)

- Section 3.2 Waste Package Criteria (cont.)
 - 3.2.14 Waste Containers and Shipping Configuration:
new section
 - At a minimum, IP-1 packaging meeting the requirements of 49 CFR 173.410 and 173.411
 - Drums 55 gallons or less must be palletized and banded
 - Waste packaged in drums will be shipped in a closed transport vehicle
 - Alternative shipping containers will be approved on a case-by-case basis - consent of the Waste Management Federal Project Director required



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Changes in NTSWAC Rev. 7

(continued)

- Section 3.3 Mixed Waste
 - 3.3.7 Analytical Data:
generator review of
analytical lab audits
- Section 3.4 **WAC** Deviations:
clarified



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WAC = Waste Acceptance Criteria

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Changes in NTSWAC Rev. 7

(continued)

- Section 4.2 Sampling and Analysis (Waste Characterization)
 - 4.2.1 Data Validation: validation report content is now a **should**
- Section 5.0 Quality Assurance Requirements for Waste Certification Programs
 - Quality Assurance Program Plan (QAPP) versus NTSWAC specific Waste Certification Program Plan (WCPP): clarified use of site QAPP or WCPP
 - 5.8 Inspection and Acceptance Testing: independence of inspection/test personnel clarified
 - 5.9 Management Assessment: clarified
 - 5.10 Independent Assessment: clarified



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Changes in NTSWAC Rev. 7

(continued)

- Section 6.0 Waste Transportation and Receipt Information
 - 6.2.1 Waste Receipt and Handling at NTS
 - 6.3.1 Accountable or Special Nuclear Material Shipments
 - 6.6 Forecast and Funding
 - 6.8 Waste Refusal



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Changes in NTSWAC Rev. 7

(continued)

- Section 6.0 Waste Transportation and Receipt Information (cont.)
 - 6.4 Waste Transportation
 - Waste shipments to the NTS **shall** be made by “exclusive-use vehicles” only
 - The sharing of conveyances with other DOE waste generators shipping directly to the NTS is acceptable



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Changes in NTSWAC Rev. 7

(continued)

- Appendix D Package Storage and Disposal Request
- Appendix E
 - Table E.1 Radionuclide Action Levels for Waste Characterization and Reporting: revised
 - Section E.7 Fissile Material Limits
- Appendix F Requirements for Intermodal (Roll-Off Boxes) LLW Disposal
- Appendix H Glossary: new terms added



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Waste Profile Revision

- Format changes
 - B.1: revision number/revision date
 - B.5: regulated asbestiform and PCBs
 - B.8: number of mixed waste containers
 - C.3: format
 - C.8: added ***Friable***
 - C.9: allows ranges
 - E.1: allows packaging ranges



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RWAP Assessment Activity

- Audits and surveillances completed

Fiscal Year	Assist Visits	Audits	Surveillances
2007	3	3	21
2008 (year-to-date)	1	2	7



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RWAP Mixed Waste Verifications

- Mixed waste verifications completed

Fiscal Year	Physical	Chemical
2007	12	3
2008 (year-to-date)	8	4



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Corrective Action Requests (CARs) Issued in Fiscal Year 2007

Section	Heading	Count
3.2	Waste Package Criteria	3
3.3.5.1	Mixed Waste Prohibited Items	1
4.0	Waste Characterization	5
5.1	Program	1
5.3	Quality Improvement	2
5.4	Documents and Records	4
5.6/5.7	Design/Procurement	1
5.8	Inspection and Acceptance Testing	1
5.10	Independent Assessments	1
6.4	Waste Transportation	2
TOTAL		21

CARs Issued in Fiscal Year 2008

(year-to-date)

Section	Heading	Count
3.1.5	Free Liquids	1
4.0	Waste Characterization	2
5.2	Personnel Training & Qualification	1
TOTAL		4



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Assessment Observations Issued

- Identified from audits and surveillances

Fiscal Year	Observations Total
2007	95
2008 (year-to-date)	14



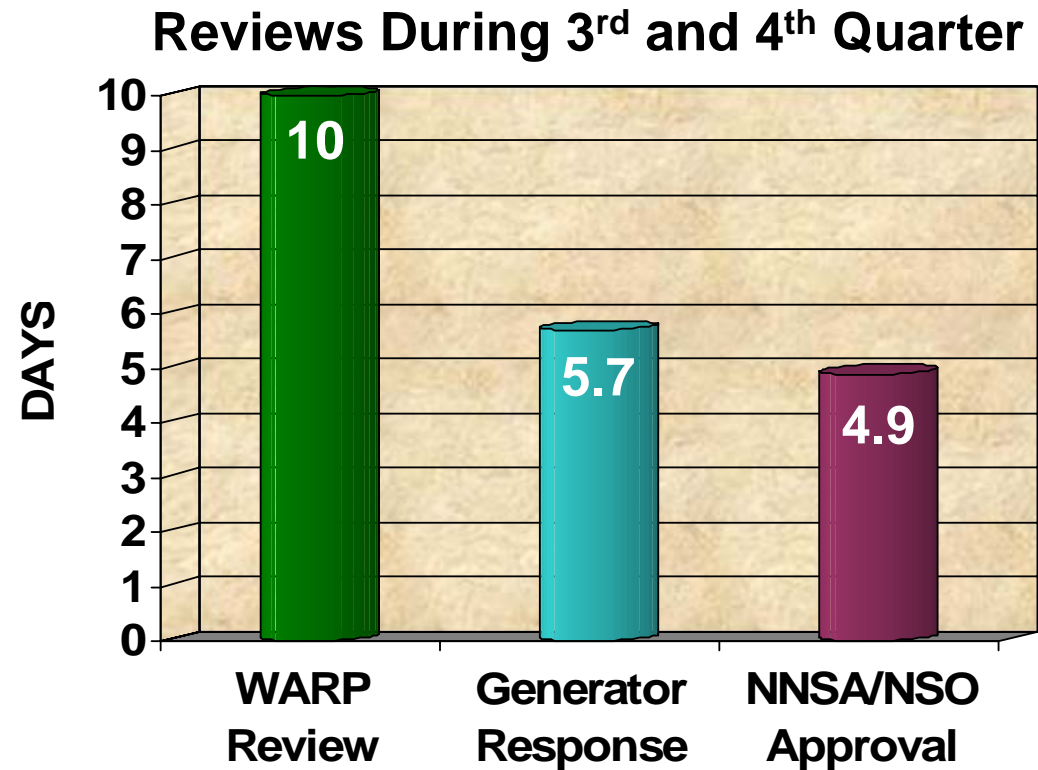
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Fiscal Year 2007 Waste Profile Reviews

- Average review time was 20.6 days for 45 reviews during the 3rd and 4th quarter (through September 21)



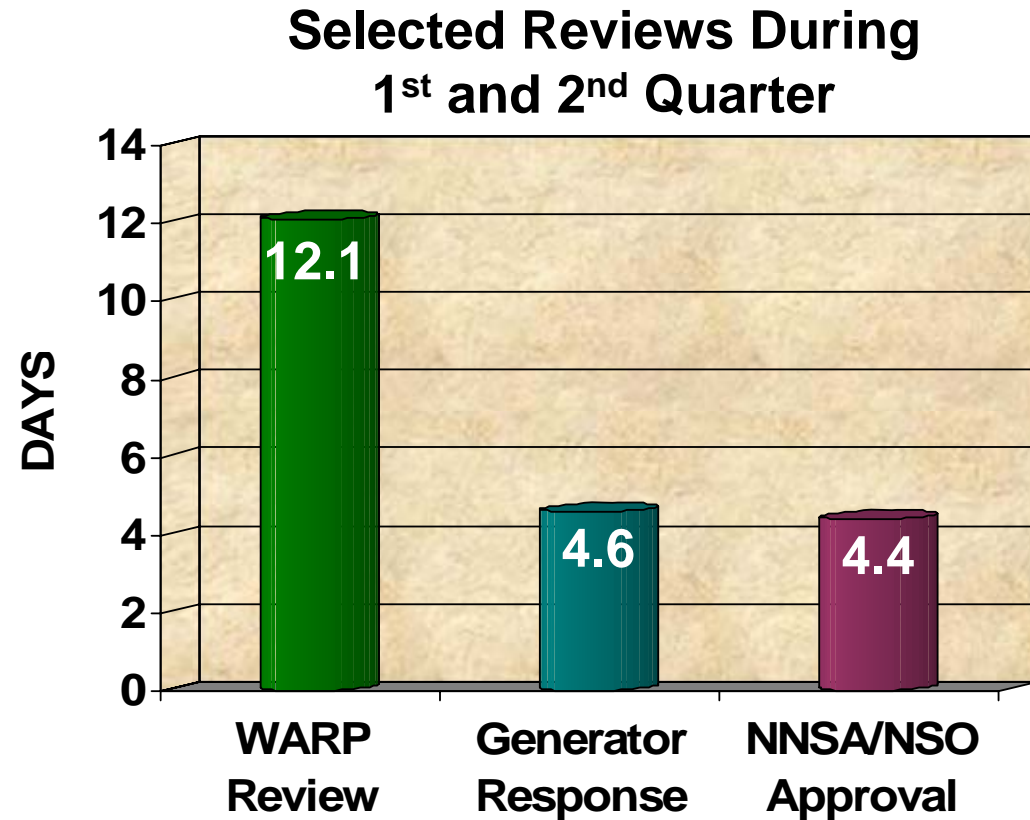
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Fiscal Year 2008 Waste Profile Reviews

- Average review time was 21.1 days for 48 reviews during the 1st and 2nd quarter (through March 10)



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Helpful Hints

- Mixed Waste Profiles – Update Annually
 - Mixed Waste Container Counts
 - Waste Profile Update
 - Changes to WCPP (etc.)
 - Drivers Personal Prohibited Items
- Official Use Only
 - Asbestiform Shipment Notification Form
 - State of Nevada Division of Environmental Protection Traveling
 - Recurring Training
 - Let Your Local DOE Know
 - Signed NICs



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