

Radioactive Waste Acceptance Program (RWAP) Update



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NTS Generators Fall Meeting

**U.S. Department of Energy Nevada Site Office
Environmental Management**

Agenda

- Nevada Test Site Waste Acceptance Criteria (NTSWAC) Revision 6-02
- Waste Analysis Plan Revisions
- Helpful Hints
- Lessons Learned
- In the Works
- Environmental Management (EM) Consolidated Business Center
- Contacts



NTSWAC Revision 6-02

- Mixed waste polychlorinated biphenyls (PCBs)
 - Waste meets requirements for the disposal in solid waste or permitted hazardous waste landfill as specified in 40 CFR Part 761 and NAC 444.9452



NTSWAC Revision 6-02

(continued)

- Mixed waste void space
 - Pictures, pictures, pictures
 - Must be greater than or equal to 90 percent full
 - Debris waste
 - RWAP and Nevada Department of Environmental Protection (NDEP)
 - 100 percent full or overfilled
 - Photos or video
 - NTSWAC strength requirement
 - Procedures demonstrating packaging techniques
 - Additional information on mixed waste void space criteria
 - http://www.nv.doe.gov/emprograms/environment/waste_management/rwap.aspx



NTSWAC Revision 6-02

(continued)

- Facility evaluations
 - Biennial audits - GONE
 - New generator and discretionary programmatic audits
 - Impromptu surveillances with more State involvement
- Monthly shipment schedule - GONE
- Container strength requirement - TRYING
- Safety factor - TRYING



Waste Analysis Plan Revisions

- Waste already treated
 - Prior to December 2005
 - Documented review
 - Waste Certification Program
 - Characterization data, land disposal restrictions, process knowledge, historical analytical, etc.
 - Treatment/packaging procedure review



Waste Analysis Plan Revisions

(continued)

- Visual inspections expanded to include
 - Real-Time Radiography tapes
 - Video tapes
 - Photographs
 - Need good documentation path



Helpful Hints

- Mixed waste shipments
 - Mixed low-level waste (MLLW) vs. low-level waste (LLW)
 - MLLW and LLW can be on the same truck, but not on the same shipment documentation
 - Manifest number
 - Currently five characters (must be populated)
 - Will be 12
 - Manifest number in comment section
 - Fixed in October



Helpful Hints

(continued)

- Deviations from strength requirement
 - Requires deviation
 - Deviation must include actions taken to address the issue
 - Action must be clearly identified in Section F of the waste profile form (e.g. clearly mark the boxes with box does not meet NTSWAC strength requirements)
- NTSWAC Implementation Crosswalk
 - Revision for 6-02
 - No longer an observation
- Certificates of disposal



Helpful Hints

(continued)

- CERCLA waste allowed in mixed waste cell
- Please use the Pre-Treatment Notification form
- Position paper available on determining the transuranic (TRU) alpha concentration of low-level radioactive waste for compliance with the NTSWAC and to ensure correlation with the Waste Isolation Pilot Plant (WIPP) Waste Acceptance Criteria



Helpful Hints

(continued)

- Revision 2 to the “Position Paper for the Use of Lead Shielding for the Disposal of Low-Level Waste at the Nevada Test Site”
 - Lead shielding acceptable if it is required for radiation protection
 - Use of contaminated lead for shielding is acceptable under certain conditions



Helpful Hints

(continued)

- Radioactive data validation
 - Usability statement
 - Data is sound/valid
 - Representative
 - Evaluate qualifiers
 - Does it meet Data Quality Objectives



In the Works

- Workgroup help on NTSWAC revision
- Lessen the need for on-site verification and chemical screening
- Streamline the profile review process
 - Limited review, additional comments, repetitive comments
- Definition of requirements
 - Open communications, Cadillac vs. Volkswagen, Bulletin Board, RWAP recommendations



EM Consolidated Business Center

DOE Ohio Field Office

- Provide support to RWAP
 - On-site assessments
 - Surveillances
 - MLLW verifications
 - Profile reviews
 - Waste generator assistance



Fiscal Year 2006 Corrective Action Requests (CARs) Issued

Section	Heading	CARs
2.2.2	Waste Profiles	1
3.2	Waste Package Criteria	1
3.2.5	Free Liquids	1
3.2.13	Contamination Levels	3
4.0	Waste Characterization	3
5.3	Quality Improvement	2
5.5	Work Processes	1
5.7	Procurement	3
5.8	Inspection and Acceptance Testing	2
5.9	Management Assessments	1
5.10	Independent Assessments	1
	TOTAL	19



RWAP Point of Contacts

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