

## From WIPP to NMED 3-24-14

As requested, below is the response to a question posed during the daily WIPP Environmental Update call. The question is (paraphrased): Describe the process to maintain WIPP waste certification and RCRA compliance of TRU waste that is temporarily stored at Waste Control Specialists (WCS) and at a later date, this waste will be shipped to the WIPP facility.

Response:

- Before the TRU waste is shipped to WCS, it is characterized and certified to the WIPP Waste Analysis Plan in accordance to the WIPP Certified Program and approved procedures. The waste data will be entered into the Waste Data System database.
- In addition, the TRU waste will comply with the WCS Waste Acceptance Criteria and the WCS RCRA permit for temporary storage.
- The TRU waste will be shipped according to the WIPP transportation certification program approved procedures.
- All waste will be profiled in accordance with WCS's RCRA permit.
- Each shipment will be submitted in accordance with WCS's process for inbound shipments and approved prior to release from shipping site. Container information will be provided for the shipment confirming that WCS's RCRA requirements are met.
- Upon arriving at WCS, the waste containers will be inspected and received in accordance with requirements of the WCS permit and license.
- In storage, the TRU waste containers will be inspected weekly in accordance to the WCS RCRA permit. WCS will maintain the physical inventory location of the TRU waste in storage.
- CCP will perform an on-site inspection of the TRU stored inventory monthly.
- CCTV cameras will be used to monitor the waste containers on a 24/7 basis.
- Security patrols of storage areas and use of Tamper Indication Devices on access points during non-working hours.
- All TRU waste stored at WCS will be segregated from all other waste.
- All shipments from WCS to the WIPP facility will complete TRU waste confirmation in accordance with the WIPP Waste Analysis Plan (WAP) before the shipment is released from WCS.
- All TRU waste containers will be shipped from WCS to the WIPP facility using the approved WIPP Transportation Program. This includes container integrity inspections prior to shipment loading and manifesting of the waste for container accountability.