

ATTACHMENT B5

QUALITY ASSURANCE PROJECT PLAN REQUIREMENTS

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QUALITY ASSURANCE PROJECT PLAN REQUIREMENTS

1 B5-1 Quality Assurance Project Plans

2 Prior to management, storage, or disposal of a generator/storage site's TRU mixed waste at
3 WIPP, the Permittees shall require that each participating site develops and implements a
4 quality assurance project plan (**QAPjP**) that addresses all the applicable requirements specified
5 in Waste Isolation Pilot Plant waste analysis plan (**WAP**) in Permit Attachment B. The
6 Permittees will approve QAPjPs from all generator/storage sites that intend to send TRU mixed
7 waste to the Waste Isolation Pilot Plant. The Permittees shall ensure that these QAPjPs include
8 the qualitative or quantitative criteria for determining whether waste characterization program
9 activities are being satisfactorily performed. The Permittees shall also ensure that QAPjPs
10 identify the organization(s) and position(s) responsible for their implementation. Additionally, the
11 QAPjPs shall also reference site-specific documentation that details how each of the required
12 elements of the characterization program will be performed.

13 The Permittees shall ensure that prior to the implementation of characterization activities at
14 participating sites, standard operating procedures (**SOPs**) were developed for all activities
15 which affect the quality of the waste characterization program elements specified in the WAP.
16 For the purposes of the quality assurance program, the term SOP refers to any site-specific
17 implementing document. Compliance with SOPs will ensure that tasks are performed in a
18 consistent manner that results in achieving the quality required for the quality assurance
19 program. The organization, format, content, and designation of SOPs shall be described in the
20 QAPjPs. Site-specific SOPs will be reviewed for consistency with the QAPjP according to the
21 Permittees' Audit and Surveillance Program specified in Permit Attachment B6.

22 B5-2 Document Review, Approval, and Control

23 The Permittees shall ensure that the preparation, issuance, and change to documents that
24 specify quality requirements or prescribe activities affecting quality for the transuranic mixed
25 waste characterization program elements specified in the WAP be controlled to assure that
26 correct and current documents are used and referenced. The QAPjPs shall include a document
27 control format consisting of a unique document identification number, current revision number,
28 date, and page number which will be placed on the individual pages of the document. All quality
29 documents for the waste characterization program shall be reviewed prior to approval and
30 issuance by qualified and independent individuals. The QAPjP review shall consider the
31 technical adequacy, completeness, and correctness of the QAPjP, and the inclusion of and
32 compliance with the requirements established by the WAP (Permit Attachment B). The
33 Permittees shall ensure that appropriate QAPjP approval is indicated by a signature and date
34 page included in the front of each document.

35 At a minimum, the Permittees shall ensure that revisions to documents that implement the
36 requirements of the WAP are denoted by including the current revision number on the document
37 title page, the revised signature page, and each page that has been revised. Only revised

1 pages need to be reissued. Changes to documents, other than those defined as editorial
2 changes or minor changes, shall be reviewed and approved by the same functional
3 organizations that performed the original review and approval, unless other organizations are
4 specifically designated in accordance with approved procedures. Editorial or minor changes
5 may be made without the same level of review and approval as the original or otherwise
6 changed document. The following items are considered editorial or minor changes:

- 7 ● Correcting grammar or spelling (the meaning has not changed)
- 8 ● Renumbering sections or attachments
- 9 ● Updating organizational titles
- 10 ● Changes to nonquality-affecting schedules
- 11 ● Revised or reformatted forms, providing the original intent of the form has not
12 been altered
- 13 ● Attachments marked "Example," "Sample," or exhibits that are clearly intended to
14 be representative only

15 A change in an organizational title accompanied by a change in the responsibilities is not
16 considered an editorial change. Changes to the text shall be clearly indicated in the document.
17 The Permittees shall provide the QAPjP for each site and all revisions to NMED upon approval
18 by the Permittees.

19 The Permittees shall ensure that QAPjPs include a detailed description of the reporting and
20 approval requirements for changes to approved QA documents and SOPs, including procedures
21 for implementing changes to these documents. All members of the site project staff are
22 responsible for reporting any obsolete or superseded information to the site project manager. All
23 site-specific changes shall be evaluated and approved by the site project manager before
24 implementation. The site project manager shall notify the appropriate personnel and the
25 affected documents shall be revised as necessary. The site project manager shall also be
26 responsible for notifying the DOE field office of the changes. The Permittees shall ensure that
27 changes that affect performance criteria or data quality, such as sample handling and custody
28 requirements, sampling and analytical procedures, quality assurance objectives, calibration
29 requirements, or QC sample acceptance criteria comply with the WAP (Permit Attachment B)
30 and shall not be made without prior approval of the Permittees.