

ATTACHMENT C5
QUALITY ASSURANCE PROJECT PLAN REQUIREMENTS

Waste Isolation Pilot Plant
Hazardous Waste Permit
March 13, 2013

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1 **ATTACHMENT C5**

2 **QUALITY ASSURANCE PROJECT PLAN REQUIREMENTS**

3 C5-1 Quality Assurance Project Plans

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

15 DOE shall ensure that prior to the implementation of characterization activities at participating
16 sites, standard operating procedures (**SOPs**) were developed for all activities which affect the
17 quality of the waste characterization program elements specified in the WAP. For the purposes
18 of the quality assurance program, the term SOP refers to any site-specific implementing
19 document. Compliance with SOPs will ensure that tasks are performed in a consistent manner
20 that results in achieving the quality required for the quality assurance program. The
21 organization, format, content, and designation of SOPs shall be described in the QAPjPs. Site-
22 specific SOPs will be reviewed for consistency with the QAPjP according to the Audit and
23 Surveillance Program specified in Permit Attachment C6.

24 C5-2 Document Review, Approval, and Control

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

37 At a minimum, DOE shall ensure that revisions to documents that implement the requirements
38 of the WAP are denoted by including the current revision number on the document title page,
39 the revised signature page, and each page that has been revised. Only revised pages need to
40 be reissued. Changes to documents, other than those defined as editorial changes or minor
41 changes, shall be reviewed and approved by the same functional organizations that performed
42 the original review and approval, unless other organizations are specifically designated in

1 accordance with approved procedures. Editorial or minor changes may be made without the
2 same level of review and approval as the original or otherwise changed document. The
3 following items are considered editorial or minor changes:

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

12 A change in an organizational title accompanied by a change in the responsibilities is not
13 considered an editorial change. Changes to the text shall be clearly indicated in the document.
14 DOE shall provide the QAPjP for each site and all revisions to NMED upon approval by DOE.

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