

CONTROL COPY NUMBER **REFERENCE COPY**

## WASTE MANAGEMENT PLAN

RDP-WM-001

REV - 1

RMI Environmental Services  
A Division of RMI Titanium Company  
Decommissioning Project  
P. O. Box 579  
Ashtabula, Ohio 44005-0579

Date Approved 9/30/96

Operations

  
Division Manager

RMI Environmental Services  
AUTHORIZATION SHEET

Document Title Waste Management Plan

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has been reviewed and is hereby authorized for  
implementation.

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will be implemented, revised whenever a change occurs, updated  
periodically, and subjected to audit by the Quality Assurance  
Department.

L. J. Britcher 9/30/96  
L. J. Britcher, Originator Date

NOTE: DOCUMENTS PERTAINING TO DISPOSAL OF WASTE MUST ALSO  
CONTAIN WASTE CERTIFICATION OFFICIALS SIGNATURE

## DISTRIBUTION LIST

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**RECORD OF REVISION**  
**RDP-WM-001 Rev 1**

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## EXECUTIVE SUMMARY

The RMI Extrusion Plant facility, owned and operated by the RMI Titanium Company, is contaminated with both radiological and hazardous materials resulting from previous operations to shape nuclear materials for the US Department of Energy (DOE). DOE's Office of Environmental Restoration and Waste Management (EM) has contracted RMI Titanium Company to conduct the RMI Decommissioning Project (RMIDP) by removing radiological and hazardous contaminants to levels that will allow the facility and adjacent areas to be released for unrestricted use. The project will allow RMI to terminate its license with the Nuclear Regulatory Commission (NRC) and to achieve closure of a Resource Conservation and Recovery Act (RCRA) Corrective Action Management Unit (CAMU).

RMI Environmental Services (RMIES) organization is a Division of RMI Titanium Company and will perform management services for the RMIDP. RMIES is committed to the safe, efficient, and responsive management of the project, according to contractual agreements and any other statutory requirements.

The purpose of this plan is to establish the programmatic requirements for management of solid, radioactive, mixed and hazardous wastes during site decommissioning. This plan was developed using the format provided in the Waste Management Plan Outline, Chapter VI, of DOE Order 5820.2A and RDP-RM-103, RMIDP Plan and Procedure Format Standard. This plan is an upper-tier document that establishes the basis for the detailed waste management activities required for facility operation, decommissioning project design, and job-specific work plans and procedures. The requirements are based on the directives contained in DOE Order 5820.2A, the Code of Federal Regulations, Titles 10, 40 and 49, and accepted waste management practices. Waste management practices shall meet Federal, State of Ohio and local laws and regulations as well as the waste acceptance criteria for the selected treatment or disposal site. Requirements in this plan are applicable to both RMIES and subcontractor personnel.

The WMP will be reviewed annually and revised as necessary.

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## 1.0 PURPOSE

To establish the requirements for management of solid, radioactive, mixed and hazardous wastes during the RMI Decommissioning Project (RMIDP).

## 2.0 SCOPE

This document and the requirements herein apply to RMI Environmental Services (RMIES) plans, procedures and manuals written for work performed at RMIDP that generates or has the potential to generate any solid, radiological, mixed or hazardous waste.

## 3.0 DESIGNATED RESPONSIBLE/FUNCTIONAL MANAGER

### 3.1 Program Manager

The Program Manager or his designee is responsible for development and implementation of the Waste Management Plan. The Program Manager shall ensure that the facility is in compliance with Federal, State, and local regulations to pertaining to processes from waste generation through disposal.

Lower level, implementing procedures will be the responsibility of the appropriate department (e.g., Engineering, Operations, Quality Assurance, Waste Certification). Below is a listing of other lower level personnel and their responsibilities to the Waste Management Program.

### 3.2 Waste Certification Official

This position is defined and required by the Nevada Test Site Defense Waste Acceptance Criteria, Certification, and Transfer Requirements (NVO-325, Rev. 1) for disposal of radioactive waste at the Nevada Test Site. The Waste Certification Officials will perform similar functions for other treatment, storage and disposal sites. Waste Certification Officials perform a waste specific QA function that maintains an independent overview of all operations in the preparation and shipment of radioactive waste. A Waste Certification Official will randomly inspect operations, waste data, packaging, labeling, loading, and shipping waste. Waste Certification Officials certify by signature that all DOT, EPA, DOE, and disposal site requirements are met. The Waste Certification Officials are independent of all other





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waste management groups when performing certification responsibilities. Waste Certification Officials will refuse to certify any or all parts of the system when non-conformances are found. RMIES has adopted the waste certification terminology for all top tier planning efforts.

The qualifications and responsibilities of the WCO are routinely specified in subtier procedures and work control documents as noted in Section 10.0 of this document.

Lower tier implementing procedures are typically customized to support different waste management options and meet both general and specific NRC, DOE, DOT, disposal site, treatment site or EPA requirements.

### 3.2.1 Qualifications

- Associated degree within a related field preferred: high school diploma with three to five years relevant work experience required. Strong communication skills and computer literacy experience essential.

### 3.2.2 Responsibilities

- Over all responsibility for determining, verifying and attesting, by signature that the waste acceptance criteria for the preparation and shipment of the radioactive, hazardous, and mixed waste programs have been met.
- Possesses working knowledge, through the completion of annual and bi-annual courses, classes and meeting, both on-site and off-site of NVO-325, NQA-1, 49 CFR (DOT), 40 CFR (EPA), DOE orders, and state-of-generation laws and requirements.
- Maintains and updates the Waste Certification Program Plan.
- Certifies by signature, all requirements of NVO-325, DOT, EPA, DOE and supporting procedures are met exactly
- Conducts inspections of initial sampling, waste data, packing, marking and labeling, shipping papers and manifest, and loading and shipping of waste.



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- Certifies via signature that all phases of the waste shipping process meet all of the requirements (LLW Certification Statement and various checklists) and that the work being performed is to the latest revision of all waste related documents.
- Certifies each container to NTS, via signature on label (NVO-211) and tamper indicating device (TID) attached to each container loaded for shipment.
- Reviews and approves, via signature, all training programs and internal documents relating to the processing of radioactive, hazardous, and mixed waste for off-site disposal.
- Ensures that each Package Certifier is properly trained and qualified.
- Refuses to certify any or all parts of the system when a non-conformance is found acting independently of all other Waste Management groups when performing certification responsibilities.
- Performs other certification activities as determined by the Project Director.
- Ensure the performance of internal audits, inspections, and surveillances.
- Ensure timely identification of deficiencies and effective corrective action.

### 3.2.3 Organizational Position

- The WCO's position is located in the Quality Assurance Department and reports directly to the Manager of Quality Assurance. When functioning in the capacity of the WCO for NTS shipments the WCO remains independent of all departments and reports directly to the Division Manager if a problem needs to be resolved.



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### 3.3 Supervisor, Waste Management

This Supervisor will control and direct all waste management and waste minimization activities. The Supervisor is also the designated Waste Minimization Coordinator required by the Ohio and US EPA. The Waste Management Supervisor will be the primary point of contact for the treatment, storage and disposal site(s) and will also coordinate activities to meet waste shipment schedules. The Supervisor will assist in development and updating of procedures.

The qualifications and responsibilities of the Waste Management Supervisor fall under the purview of the D&D Operations Manager and are specified in the subtier procedures and work control documents as noted in Section 10.0 of the Waste Management Plan.

Lower tier procedures are typically customized to support different waste management options and meet both general and specific NRC, DOE, DOT, disposal site, treatment site or EPA requirements.

#### 3.3.1 Qualifications

- B.S. degree preferred, in a related field with three to five years relevant work experience required. Previous supervisory experience essential. Strong communication skills and computer literacy essential.

#### 3.3.2 Responsibilities

- Supervise the duties/activities of the Waste Management Coordinator.
- Supervise the duties/activities of the Waste Preparation & Shipping Coordinator.
- Assist in developing and updating operating procedures.
- Assurance that each waste stream meets the latest NVO-325 criteria.
- Establishment of waste shipment forecasts with DOE-NV and Bechtel NV.



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- Assure compliance with RMI's Waste Certification Program Plan, RDP-WM-129
- Act as primary contact to DOE/NV and Bechtel NV.
- Develop disposal site waste shipment schedules.
- Review anticipated work to provide guidance relative to RDP-WM-001, Waste Management Plan, and RDP-WM-130, Waste Minimization and Pollution Prevention Awareness Plan.
- When reviewing Work In Process (WIP's) documents, participates in the standard review and comment cycle for (WIP) approval and signs the work signature sheet (WSS). If necessary provides additional instructions to be attached to the WIP regarding waste management and/or waste minimization.
- Reviews on going work activities to ensure that waste management requirements are in place and being followed.

### 3.3.3 Organizational Position

- The Supervisor, Waste Managements position is located in the Operations Department and reports directly to the Manager of Operations.

### 3.4 Manager, Construction Operations

This Manager coordinates resource allocation to perform waste management activities. The Manager will assist in development and updating of procedures, plans and schedules.

### 3.5 Trainer

The Trainer shall be responsible for all training administration including approval of training development plans, scheduling, matrices development, documentation, training records management, conducting and coordinating training on site. The Trainer shall be responsible for assisting Department Managers with coordinating training requirements and qualifications of site workers and subcontractors.



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### 3.6 Director, Environmental Safety and Health

The Director, Environmental Safety and Health or designee is responsible for ensuring that waste management operation: comply with all applicable Federal, State, Local regulations and DOE Orders/Directives. This Director or designee is also responsible for creation and submittal of annual waste generator, SARA, and Waste Minimization reports to the Ohio EPA and US EPA. The Director or designee will also review all data collected for characterization of RCRA hazardous materials.

### 3.7 Manager, Engineering

This Manager coordinates and provides engineering resources to: evaluate and recommend cost effective waste minimization methods and processes; write or review and comment to waste management procedures, provide design specifications to procurement department for equipment and materials; provide risk assessments; provide engineering work packages.

## 4.0 REQUIREMENTS/RESPONSIBILITIES

### 4.1 Waste Management System Requirements

Detailed instructions will be developed for waste minimization, characterization, packaging, storage, certification, tracking/accountability, shipment and disposal for decommissioning activities to maintain compliance with regulatory requirements and the waste acceptance criteria of selected treatment, storage or disposal sites.

Procedures will establish the protocol to manage solid, hazardous, radioactive and mixed wastes. Discussed below is a brief outline of the activities under the waste management umbrella.

### 4.2 Waste Generation Requirements

Facility maintenance activities and specific decommissioning tasks will both generate wastes. The types of wastes generated from facility maintenance operations are known and their quantities are predictable. Decommissioning project wastes will vary both in physical and chemical characteristics and quantity according to the technologies used and work procedures developed.



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The wastes generated during decommissioning are classified into two general categories (1) wastes generated during decommissioning activities (e.g., building demolition, equipment decontamination, etc.) and (2) wastes generated from site support activities (e.g., waste water treatment sludge, maintenance waste, office trash, etc.) All waste streams shall be characterized to allow classification as hazardous, radiological, mixed or noncontaminated solid waste.

Existing equipment and supplied materials will become waste through the decommissioning process by the deactivation of equipment and the use of materials. Since RMIDP is a DOE project, a majority of the material and equipment is government furnished equipment (GFE). The Material/Equipment Disposition Plan will be utilized to disposition GFE items. The Project Control System, by scheduling decommissioning activities and in turn by the Field Implementing Document that implements the decommissioning activities, determines when the wastes are generated. Work will be scheduled and performed such that the Waste Management Program has sufficient resources to control, track and safely store the wastes.

The Site Treatment Plan discusses the description, evaluation and selection of Treatment, Storage and Disposal (TSD) options for mixed wastes. TSD options and evaluations will occur for the other types of wastes during Waste Minimization Plan activities.

Currently existing mixed wastes at the site have been characterized and are stored in accordance with the current RCRA Hazardous Waste Storage Permit. Waste streams generated during D&D activities are anticipated to be similar to those already characterized.

#### 4.3 Radiological Exposure to Personnel and Releases to the Environment

The control of radiological exposure is addressed in RMI-L-60, HP Program Plan. RDP-MGT-100, Work Control Process, and RDP-MGT-107, Work Authorization Procedure, specify the processes by which the overall risk level of a job, including radiological/ALARA concerns is evaluated, documented and controlled.

The specific details of any work activity are controlled through routine implementation of several subtier procedures (RMI-L-60 series) and work control documents as stated in Section 10.0 of the Waste Management Plan. These procedures are used to specify and control work activities that are potential radiation hazards.





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#### 4.4 Waste Minimization Requirements

The Hazardous and Solid Waste Amendments Act of 1984 (HSWAA) established a national policy that made waste minimization a high priority. In support of this policy, the US EPA has implemented several programs to encourage waste minimization including requiring waste minimization programs, land disposal restrictions, and technical assistance programs. It is the intent of these programs to reduce the volume or quantity and toxicity of waste to the degree determined by the generator to be economically practicable. The Waste Minimization Program is designed to meet the regulatory requirements and governmental policy directives contained in Resource Conservation and Recovery Act (RCRA) and DOE Order 5820.2A. The waste minimization and pollution prevention requirements contained in DOE Order 5400.1 are not contractually applicable to RMIDP. The purpose and intent of DOE Order 5400.1 is fulfilled by meeting the US EPA and Ohio EPA regulations.

To meet the policy and requirements of the US and Ohio EPA, RMIES has established a Waste Minimization Program to reduce the quantity and toxicity of the wastes generated. This program is an organized effort designed to continually evaluate and implement waste minimization techniques and reduce the release of pollutants and wastes to the environment.

The *Waste Minimization and Pollution Prevention Awareness Plan*, RDP-WM-130 (RMI-L-184) contains the policies, strategy, and support activities of the RMI Decommissioning Project Waste Minimization Program. Primary elements of the plan include: (1) the waste minimization policy statement; (2) the establishment of a Site Waste Minimization Coordinator; (3) the development of waste generation data through Project Waste Minimization Assessment Reports; and (4) a process for continual evaluation of the Waste Minimization program.

The Waste Minimization and Pollution Prevention Awareness Plan places the highest priority on source reduction. Next in the waste minimization hierarchy is evaluation of recycling or reuse of waste materials that cannot be eliminated or reduced. Reducing the volume, toxicity or mobility of the remaining waste before storage or disposal is the final waste treatment alternative. Waste minimization activities will encompass all forms of waste including solid, hazardous, radioactive and mixed wastes.



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#### 4.5 Waste Characterization Requirements

Waste characterization shall be performed on waste streams and shall be based on radiological and chemical analyses of statistically valid sample populations or detailed process knowledge. Analytical methods shall be performed according to approved standard operating procedures. To assure the precision and accuracy of the data, sampling and analytical quality assurance controls shall be implemented. Characterization data shall be fully documented to support waste manifests and waste tracking then archived for future reference.

Wastes in which the radioactive contamination is above unrestricted release limits shall be identified as radioactive contaminated waste. RCRA hazardous waste that contains radioactive contamination above the unrestricted limits shall be identified as mixed waste. Mixed waste shall be managed according to the requirements for both RCRA hazardous and radioactive contaminated waste.

Waste that meets the criteria listed in 40 CFR Part 261 shall be identified as an RCRA hazardous waste and managed according to RMI Titanium Company Extrusion Plant's Hazardous Waste Management Permits, 40 CFR Parts 262-268 and Ohio Revised Code 3745. RCRA waste labeling, storage, and reporting requirements do not apply until the material is determined to be RCRA hazardous waste.

#### 4.6 Waste Packaging Requirements

Wastes shall be packaged, certified and stored according to approved procedures to meet the requirements of 10 CFR Parts 20, 61 and 71, 40 CFR subchapters F and I, 49 CFR Part 173 and the treatment or disposal site. Trained and qualified individuals (e.g., Waste Certification Officials for shipments to NTS) shall attest to waste packaging documentation, stating the package meets the acceptance criteria of the treatment or disposal site.

Marking and labeling of containers shall be accomplished per 49 CFR part 172, 10 CFR part 71 and the applicable treatment or disposal site requirements. Label mixed waste containers for each hazard according to 49 CFR Part 173. Mixed waste packages of 110 gallons or less shall also be identified according to the requirements of 40 CFR Part 262.





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#### 4.7 Waste Certification Requirements

A certification program shall be developed to meet the DOT, US EPA, Ohio Environmental Protection Agency (Ohio EPA), DOE regulations and the waste acceptance criteria of the treatment, storage or disposal site. For example, NVO-325, Rev. 1, *Nevada Test Site Defense Waste Acceptance Criteria, Certification and Transfer Requirements*, defines the waste acceptance criteria and certification program requirements for wastes shipped to the Nevada Test Site (NTS). Following certification, waste packages will be moved to an approved storage location to await shipment to the designated treatment, storage or disposal facility.

#### 4.8 Waste Shipment Requirements

Loading the waste for shipment off-site, blocking, bracing, and tie-down practices will be consistent with those outlined in 49 CFR parts 100-199 and the treatment or disposal site requirements. RMIES will develop Waste Shipment procedure(s) to describe the actions necessary to meet the requirements of the approved disposal site, for transportation and disposal of hazardous, radiologically contaminated, and mixed wastes.

Package, mark, label, and placard waste shipments per Title 49 CFR Parts 171-179 and the applicable treatment or disposal site requirements. Ship MW following US EPA guidelines provided in Title 40 CFR Part 263.

#### 4.9 Waste Tracking and Accountability Requirements

A procedure will be developed to provide a method to track all obsolete materials and wastes from the time the materials are inventoried and placed into containers, until the containers are filled, labeled and placed into storage awaiting shipment. This procedure defines the method to locate any waste container and identify the contents of that container. Information from the database used for Waste Tracking and Accountability will be used as input for the Mixed Waste Inventory Report (MWIR), Waste Material Inventory System (WMIS), Contaminated Media/Waste Data (CM/WD), Baseline Environmental Management Report (BEMR) and the monthly Waste Operations Report (WOR) databases.



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## 5.0 INTERFACES BETWEEN PLANS AND PROCEDURES

### 5.1 Project Control System Interface

The RMIES Project Control System (RPCS) supports control of the cost and schedule of the RMIDP consistent with the Project Technical Baseline. The RPCS System Description (RDP-PCS-001) describes the Project Control System.

Work is not permitted until control account work packages are authorized by the RMIES Program Manager via the RPCS. Waste Management personnel will not approve the work until resources are available to process the types and amounts of waste the work will generate.

### 5.2 Configuration Management Plan Interface

The Configuration Management Plan, RDP-OPS-007, provides the management process by which the "baseline" of a system is established and used to control and monitor the configurations throughout the accomplishment of Decontamination and Decommissioning, including waste management activities. The CM Plan provides for definition of a graded approach to be used in the application of CM controls to various systems and documents.

The CM Program provides a means by which the configuration of systems, structures and components are maintained current throughout performance of D&D work activities. The documentation associated with a system is defined as the baseline of that system. The baseline consists of, but is not limited to, items such as drawings, procurement specifications, operating and maintenance procedures, testing data, and characterization data. The baseline for each system will be specified by applying a graded approach methodology which is described in detail in the CM Plan. The graded approach considers the relative importance of the system to safety of the worker, the general population and the environment.

Baselines will be developed, monitored and revised as necessary for Waste Management activities. A graded approach consistent with the CM plan will be applied to all Waste Management activities.



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### 5.3 Quality Assurance Program Plan Interface

The Waste Management Plan interfaces with the control requirements outlined in the Quality Assurance Program Plan (QAPP), RDP-QA-001. Section 2.4.2 of the QAPP discusses the Graded Quality Requirements application to activities consistent with their risk to safety and programmatic objectives. This Waste Management Plan applies a graded approach (see also paragraph 8.2) to determine the relative importance of waste management activities compared to the risk. System walkdowns, sampling and analysis and characterization data are used to determine the risk of waste management activities. This Waste Management Plan specifies that the quality assurance controls will be applied consistent with the requirements of the QAPP.

Under the umbrella of the QAPP, the Quality Assurance Department will be responsible for: auditing waste management activities to ensure regulatory and procedural compliance, auditing of external vendors and suppliers to ensure conformance to regulatory and contractual requirements, and receipt inspection of materials and supplies to ensure the materials meet the minimum standards for use. Additional goals of the QAPP and associated procedures are to ensure the quality and reliability of the methods and procedures employed in sampling and analyzing the wastes. Ensuring the quality and reliability of the methods and procedures employed in reporting and interpretation of the data are also goals of the Quality Assurance Plan. The QAPP will also ensure that all reporting and safety requirements are met.

### 5.4 Work Control Process Interface

The Work Control Process described in procedure RDP-MGT-100 is the controlling procedure for work done in support of the RMIDP. RDP-MGT-100 identifies requirements for preparing Field Implementing Documents and securing written authorization to perform physical work planned in the authorized Central Account Work Packages. An approved Work Instruction Package (WIP), which includes a Safety Check List (SCL) and other supporting documentation, is necessary to perform physical work of a unique nature. Blanket WIPs or Work Requests with an attached SCL are used to perform routine and/or repetitive tasks. Field Implementing Documents provide a framework for controlling physical work activities while minimizing potential health and safety affects to workers, the public, and the environment in compliance with all applicable Federal, State and local regulations. During planning, a risk assessment is performed to consider the relative



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risks with respect to human health, the environment and the D&D mission. The Work Control Process provides for documentation updates related to the work performed. The supervisor responsible for the work will provide an updated document that will ensure that the technical baseline for affected systems is maintained current.

Material coming into the Waste Management Program is controlled by various walkdown, characterization, sampling, analysis and disposition procedures. Information from these procedures determines the type of waste, potential waste minimization schemes and disposal criteria. Hold points and sequenced steps in the procedure control the flow and performance of the work. The planning and scheduling process (see paragraph 5.1) also controls material to ensure that the resources are available to govern and disposition the material.

#### 5.5 Records Management System Interface

As part of the Technical Baseline, the Waste Management Plan interfaces with existing Document Control System to maintain control of the Waste Management Plan support and implementation procedures. The Records Management Plan (RDP-RM-001) and implementing procedures, specify the methods used for control and management of documents. The Records Management Plan procedures in addition to the Configuration Management Plan data base, describe how documents are identified and controlled during the performance of this decommissioning project.

Implementing procedures for the Waste Management Plan comply with the record management and record retention requirements specified in the QAPP discussed in paragraph 5.2.

Procedures, evaluations, characterization data, drawings and other associated records are updated and preserved to maintain "cradle to grave" control and history of all wastes generated at the site.

#### 5.6 Training Interface

To ensure that RMIES and contractor personnel are adequately prepared to perform the tasks to which they may be assigned and to recognize and deal safely with the hazards (radiological and non-radiological) to which they may be exposed, RMIES has developed a site Training Program Plan (TPP). Before initiating decommissioning tasks RMIES will provide task-specific training, as appropriate,



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to instruct personnel in proper waste management, waste minimization, safety and quality assurance requirements. Personnel working at RMIDP will be trained on waste minimization and pollution prevention.

The Safety Engineer/Trainer conducts the introductory and continuing training program for all personnel. On-the-job training will also constitute some of the training program. The continuing training program includes a review of state and federal regulations, hazardous waste training, radiological training and safety precautions.

The amount and type of training are determined by the job description, scope and the expected duties of the personnel involved. A training matrix is provided in the TPP describing the training required for various job positions. RMIES employees and subcontractor personnel must comply with the requirements of the training matrix as determined by the Safety Engineer/Trainer. Subcontractor personnel are expected to have the general training required for the job (e.g., Hazwoper - 29 CFR part 1910.120, Hazardous Materials Shipping - 49 CFR part 172.700) and will require only local, site specific training.

#### 5.7 Licensing and Permitting Interface

The Licensing/Permitting Plan (RDP-ESH-108) interfaces with the WMP through the nature of licenses and permits obtained from the various regulatory agencies. The site environmental permits allow discharges of waste effluent to the air and water and allow storage of specified volumes of hazardous waste materials at specified site locations. Amendment No. 6 to NRC license SMB-602 allows the possession and use of natural and depleted uranium incidental to site characterization and pre-decommissioning activities. The NRC license also allows disposal of existing radioactive wastes in DOE designated facilities. Changes to the permits reflect a change from production operations to soil, groundwater and building remediation. The Licensing/Permitting Plan describes the licenses and permits currently held by the project. The Licensing/Permitting Plan will direct the application for new permits or modifications to current permits required due to waste management activities.

#### 5.8 Material/Equipment Disposition Plan Interface

The Material/Equipment Disposition Plan establishes the processes for disposition of government and RMIES (contractor) property used by or generated from building





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and equipment remediation activities during the project. This Plan is concerned with material and equipment owned by the DOE and radioactively contaminated RMIES (contractor) property. The Material/Equipment Disposition Plan specifically excludes Special Nuclear Material (SNM), soils, and groundwater.

#### 5.9 Site Treatment Plan Interface

Section 3021(b) of the Resource Conservation and Recovery Act (RCRA), as amended by the Federal Facility Compliance Act (FFCA), requires the DOE to prepare plans describing the development of treatment capacities and technologies for treated mixed wastes. The FFCA requires Site Treatment Plans (STP) to be developed for each site at which DOE generates or stores mixed waste and submitted to the state and/or federal EPA. The state and/or federal EPA may approve, approve with modification, or disapprove the STP. The DOE will prepare a summary of the STP's to provide a national picture of technology needs and options.

The STP addresses mixed wastes and presents information on the treatment technology and capacity needs for the mixed waste found at the site. Also identified are possible options for treatment, where this capacity exists and the uncertainties, economics and other implications associated with each option.

WMP uses the information from the STP for planning purposes in treatment, storage and disposal of mixed wastes.

#### 5.10 Regulatory Compliance Plan

The purpose of the Regulatory Compliance Plan is to identify and interpret the regulatory and DOE requirements applicable to the project and to use these regulations and requirements as a baseline for evaluating the level of compliance. Identification and resolution of key compliance issues that arise and providing a documented, integrated strategy for regulatory compliance is an additional function of the Regulatory Compliance Plan.

The Regulatory Compliance Plan will influence the WMP and its lower level implementation documents via the interpretation and evaluation of compliance with the federal, state and local regulations and also DOE Orders/Directives. As regulations and requirements change, the Regulatory Compliance Plan will necessitate changes to the WMP and associated documents to conform with the new regulations and requirements.



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## 6.0 PLANNED COURSE OF ACTION

This plan was developed to ensure that a waste management program is established and maintained in accordance with applicable requirements. The requirements that govern the waste management program include various regulatory (DOE, EPA, NRC, DOT) requirements applicable to decommissioning operations and the requirements put forth by the various treatment and disposal sites for acceptance of waste.

Implementation of this plan is through the development of supporting plans and procedures. Many of these procedures have been written and implemented. As the project enters new phases, the waste management practices will evolve to meet the project demands.

## 7.0 IMPLEMENTATION SCHEDULE

Many programs and procedures discussed in this plan have been implemented and will continue to evolve during the decommissioning project.

The control of cost and schedule for the Waste Management Plan for the project will be managed in accordance with and through the RMIES Project Control System. Each of the supporting plans have implementation schedules. Supporting procedures listed in section 4 that are not currently active (e.g., Waste Tracking and Accountability) will be written or implemented as resources are available.

## 8.0 SUPPORTING METHODOLOGIES

### 8.1 Development of Plan

This plan was developed using the existing Waste Management Plan (RMI-L-190) with guidance on the format from RDP-RM-103. This plan is similar in form and content to the Waste Management Plans in use for other DOE sites. The criteria, methodology and techniques for waste segregation, certification, packaging, shipping, storage, treatment, disposal and minimization have been discussed with various disposal and treatment sites.



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## 8.2 Graded Approach

The graded approach, as used by the WMP is the application of criteria to determine the relative risk of each system, work task, structure, or component under consideration. Risk is graded with respect to the risk to human health, the risk to the environment, the risk of violating regulatory requirements, or the risk of negatively affecting the D&D mission. System walkdowns, sampling and analysis and characterization data are used to determine the contamination risk and anticipated waste form of materials generated by waste management activities. The graded approach will allow application of managerial controls commensurate with the importance of the evaluated systems. A graded approach allows allotment of the limited available resources to the portion of the WMP that will give the greatest result for the least expenditure of resources.

## 8.3 Ownership

The WMP has authority over wastes generated during decommissioning, including solid, radioactive, hazardous and mixed wastes. Each type of waste must be managed properly to ensure minimization and proper disposal or treatment. Personnel will be trained per paragraph 5.5 on waste minimization, and how each individual can help in the waste management process.

## 8.4 Total Quality Management

QA and Waste Management personnel will perform periodic audits and assessments to ensure compliance with the WMP and related procedures. Audit and assessment findings as well as other suggestions for improvement will be incorporated into the WMP and associated procedures during annual revisions to these documents.

## 8.5 Waste Management Meeting

RMIES policy is to holding routine waste management meetings to schedule, track and regulate waste management activities. The Waste Management Supervisor chairs a meeting attended by personnel from Engineering, Operations, Waste Certification, Environmental Safety and Health, Quality Assurance and Project Management.





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## 9.0 DEFINITIONS

CFR - Code of Federal Regulations

D&D - Decommissioning and Decontamination

Disposition - A step in the property management process by which material or equipment is no longer required by the project and is removed from the accountable inventory and site.

DOE - Department of Energy

DOE-OH - DOE Ohio Field Office

Engineering Package - A plan to perform work. A technical plan including Design Engineering for performing all or part of the activities described in a Work Package. From an Engineering Package one or more individual Field Implementing Documents will be generated to perform the work.

ES&H - Environmental Safety and Health Department

Field Implementing Documents - Documents used to plan, authorize and control performance of work. These documents may be Work Instruction Packages (WIP's), Blanket WIP's or Work Requests.

Equipment - Property of a capital nature (including machine tools, test equipment, furniture, vehicles, and accessory and auxiliary items) for use in manufacturing, performing services or for any administrative or general plant purpose.

Excess - A state of disposition where items under control of a federal agency are no longer required for the agency's needs and is available for transfer to other federal agencies.

GFE - Government Furnished Equipment. Property in the possession of or directly acquired by the Government and subsequently made available to the contractor.

Hazardous Wastes - A waste that meets the criteria of ignitable, corrosive, reactive or toxic as defined by Code of Federal Regulations, Title 40, Part 261. Hazardous Wastes are also known as RCRA wastes, TSCA wastes, listed wastes or characteristic wastes.



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**Hazardous Waste Management** - The systematic control of the collection, source separation, storage, transportation, processing, treatment, recovery and disposal of hazardous waste.

**Hold Point** - Specified steps within a Field Implementing Document that will require an initial/date by an individual other than the person doing the work (e.g., QA, Engineering, Safety, Foreman, Waste Certification Official).

**HP** - Health Physics

**Item** - An all encompassing term that refers to DOE assets including buildings, nuclear materials, supplies, computers, office equipment, and process equipment.

**Material** - Property that may be incorporated into or attached to a deliverable end item or that may be consumed or expended in performing a contract. Including assemblies, components, parts, raw and processed materials, and small tools and supplies that may be consumed in normal use in performing a contract.

**MW** - Mixed Waste, is a waste that contains both radioactive and hazardous components

**MWIR** - Mixed Waste Inventory Report. Required by the Federal Facilities Compliance Act and provides an inventory of all mixed waste stored or generated, or expected to be generated over the next five years. The MWIR also includes a listing of anticipated treatment capacities and technologies.

**Non-Hazardous** - Waste that is not defined as hazardous, by the Code of Federal Regulations, Title 40, Part 261, "EPA Regulations for Identifying Hazardous Waste."

**NRC** - Nuclear Regulatory Commission

**NTS** - Nevada Test Site

**Permit** - A document issued by a regulatory agency allowing for the completion of a task or activity for which a permit is required. A permit may contain a description of specific conditions that must be completed as a part of the task or activity. The NRC license is considered a permit.

**Physical Work** - Operating, removing or otherwise changing the status of equipment, components or structures on the site.



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Process Knowledge - Characterization or data gathered by personal interviews or visual clues as to the history of use of items, their storage location, and any previous radiological and hazardous material survey data known to exist. Process knowledge can be used in lieu of radiological and hazardous material survey only on items with closed surfaces. Process knowledge shall not replace radiological monitoring of items for free release nor be used as a matter of convenience. The Health Physicist shall determine when process knowledge can be used for free release on a case by case basis.

Property - All property both real and personal. Property includes facilities, material, tooling, test equipment, furniture, vehicles and agency peculiar property.

RCRA - Resource Conservation and Recovery Act. Hazardous waste, as defined by the Code of Federal Regulations, Title 40, Part 261, "EPA Regulations for Identifying Hazardous Waste."

RMIES - RMI Environmental Services

Retire - A state of disposition when government owned property is worn out, lost, stolen, destroyed, abandoned, or damaged beyond economical repair. Retired equipment is not a waste until assigned to a waste stream by the waste management process.

Risk Assessment - An identification of potential hazards and a determination of the potential consequence of each hazard as well as the qualitative determination of the probability of its occurrence.

RMI - RMI Titanium Company

RMIDP - RMI Decommissioning Project

Scrap - Property that has no value except its basic material content.

Solid Waste - Waste that is not a RCRA, TSCA, listed, characteristic or radioactive waste. Material that may be disposed of in a typical municipal landfill.

Storage - the holding of a material for a temporary period, at the end of which the material is treated, disposed of or stored elsewhere. Typically used in a hazardous waste context.



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Subcontractor - Subcontractor and designated subcontractor personnel are persons approved to perform work on the site per a contract with RMIES and all of the specifications detailed within that contract.

USEPA - United States Environmental Protection Agency

WAC - Waste Acceptance Criteria. Establishes procedures, requirements, and criteria for safe transfer and disposal of low-level radioactive and mixed waste at the specific treatment, storage or disposal site. Includes waste characterization certification requirements and requirements for waste receipt.

Walkdown - An assembly of appropriate personnel at a specific work site to review a task step by step for planning and specifically identifying radiological or hazardous materials concerns. For each walkdown representatives will recommend a course of action for the concerns identified. Recommendations from the walkdown will be incorporated into the field implementing document.

Waste - Material that has no value, and its basic material content has no value.

WCO - Waste Certification Official

WIP - Work Instruction Package. An assembly of documents designed to authorize, initiate, and control unique physical work tasks. A Blanket WIP is a WIP that covers routine and repetitive tasks. A Blanket WIP may remain open for extended periods with scheduled review dates unless conditions change.

WMP - Waste Management Plan

WOR - Waste Operations Report. A contractually required report from RMIES to the DOE monthly. The report will discuss waste management activities, including audits, appraisals and safety related activities planned and performed. Also included in the report are the actual waste quantities treated, stored, disposed of and transported for each waste type.

Work Package - The work package is a layout of work. A detailed, short span job or task identified and controlled by assigning man-hours, budget, schedule, and milestones within a Control Account. The Work Package is at Work Breakdown Structure Level VII.

Work Request - A Field Implementing Document issued by either the Engineering or Operations Department to authorize, initiate and control low risk, low liability (risk



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assessment level III) work. Work authorized by a Work Request is not of high enough liability or risk to require a WIP. A Work Request has a lower level of review and detail compared to a WIP.

WT&D - Waste Transportation and Disposal.

## 10.0 REFERENCES

United States Department of Energy. Nevada Test Site Defense Waste Criteria, Certification, and Transfer Requirements. NVO-325, Revision 1.

United States Nuclear Regulatory Commission, Code of Federal Regulation, Title 10, Part 20 - Standards for Protection Against Radiation.

United States Nuclear Regulatory Commission, Code of Federal Regulation, Title 10, Part 61 - Requirements for Land Disposal of Radioactive Waste.

United States Nuclear Regulatory Commission, Code of Federal Regulation, Title 10, Part 71 - Packaging and Transportation of Radioactive Materials.

United States Environmental Protection Agency, Code of Federal Regulations, Title 40, Parts 261 through 268.

United States Department of Transportation, Code of Federal Regulations, Title 49, Parts 100 through 199.

Environmental Regulatory Guide for Radiological Effluent Monitoring and Environmental Surveillance, DOE/EH-0173T, January 1991.

DOE-CH Contract NO. DE-AC02-93CH10555; DOE-CH RMIDP FY 94 Technical Direction and Decommissioning (D&D) of RMI Titanium Company Extrusion Plant, Ashtabula, Ohio, of October 27, 1993, R. C. Baker to N. F. Brewer.

DOE Order 5820 2A, Radioactive Waste Management.

RDP-ENG-101, Procedure for Development of Characterization Reports

RDP-ENG-102, Procedure for Development of D&D Plan



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RDP-ENG-103, Development of Work Plans

RDP-ENG-104, SOP for Radiological and Hazardous Environmental Sampling and Analysis of Area C

RDP-ENG-105, SOP for Radiological and Hazardous Environmental Sampling and Analysis of Area A

RDP-ENG-106, SOP for Radiological and Hazardous Environmental Sampling and Analysis of Area E

RDP-ENG-108, SOP for Radiological Sampling and Analysis of Area G

RDP-ENV-009, (RMI-L-176) Containerized Waste Characterization Plan for Shipment to NTS

RDP-ENV-103, (RMI-L-175) Environmental Assessment of Old Offices in RF-6

RDP-ENV-105, RCRA and TSCA Contaminants Inspection for Buildings and Equipment

RDP-ENV-106, SOP for Copper Hydroxide Filter Cake Characterization for Disposal at NTS

RDP-ENV-107, SOP for Characterization of Containerized Asphalt for Disposal at NTS

RDP-ENV-112, SOP for Characterization of Containerized Pond Sediment for Disposal at NTS

RDP-ESH-001, OSHA 1910.120 Site Safety and Health Plan

RDP-ESH-008, (RMI-L-214) Licensing and Permitting Plan

RDP-HP-147, Radiological Surveys When Shipping and Receiving Exclusive Use Trailers for Radioactive Materials

RDP-MGT-001, Management Plan

RDP-MGT-002, Total Quality Management Plan





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RDP-MGT-007, Configuration Management Plan

RDP-MGT-100, Work Control Process

RDP-MGT-107, Work Authorization Procedure

RDP-OPS-001, Rev 1, Facility Remediation Plan, February 14, 1994

RDP-OPS-009, (RMI-L-203) Site Characterization Plan

RDP-OPS-010, (RMI-L-205) Groundwater Characterization Work Procedure

RDP-OPS-011, (RMI-L-206) Soils Characterization Work Procedure

RDP-OPS-012, (RMI-L-207) Building Characterization Work Procedure

RDP-OPS-144, (RMI-L-144) Restoration Operations Program

RDP-OPS-205, Processing of Drummed Copper Hydroxide Filter Cake for Shipment to NTS

RDP-PCS-001, (RMI-L-211) RMI Project Control System Description

RDP-PCS-102, (RMI-L-211.009) Schedule Control

RDP-PCS-103, (RMI-L-211.003) Control Account Planning and Authorization

RDP-PFO-002, Material/Equipment Disposition Plan

RDP-QA-001, (RMI-L-125) RMI Extrusion Plant Site Quality Assurance Program Plan

RDP-QA-002, (RMI-L-149) Surface Soil Characterization Project Walkover Survey QA Plan

RDP-QA-003, (RMI-L-131) QA for Procurement and Use of Drums

RDP-QA-004, (RMI-L-171) QA Requirements for the Procurement of Shipping Containers

RDP-REG-002, Regulatory Compliance Plan



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RDP-RM-105, (RMI-L-164) Drawings, Documentation and Changes Procedure

RDP-TNG-001, RMIDP Training Program Plan

RDP-WM-004, (RMI-L-156) Surface Soil Characterization Procedure for Shipment to NTS

RDP-WM-013, Waste Pile Characterization Plan for Shipment to the Nevada Test Site

RDP-WM-102, Packaging of Low-Level Radioactive Waste for Off-site Disposal

RDP-WM-128, (RMI-L-191) Waste Management Implementation Procedure

RDP-WM-129, (RMI-L-107) Waste Certification Program for Disposal of Waste at NTS

RDP-WM-130, (RMI-L-184) Waste Minimization and Pollution Prevention Awareness Procedure

RDP-WM-144 3003, Packaging and Shipping by Special Method

RDP-WM-144 3004, Packaging and Shipping by Limited Quantity

RDP-WM-144 3005, Depleted Packaging and Shipping Procedure

RDP-WM-144 3006, Discard Items Separations and Storage

RDP-WM-144 3008, Guidelines for Processing / Surveying / Unloading / Loading / Laundry Drums / Other Packages for Exclusive Use Trailers



## NON-INTENT INTERIM CHANGE NOTICE

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Procedure Number: RDP-MGT-100

Revision: 1 ICN: 1

Document Title: Work Control Process Procedure

### Document Change:

- 1 Renumber current sections 4.1.3.5.4 and 4.1.3.5.5 to 4.1.3.5.5 and 4.1.3.5.6 respectively.
- 2 Add a new Section 4.1.3.5.4, to read, "Designates radiological hold points in work packages."

### Reason for Change:

To implement comments submitted by the NRC.

Department: \_\_\_\_\_

Date Issued: \_\_\_\_\_

Prepared By: E. Senra 10/6/96  
Date

Approved: A. L. Wilkins 10/2/96  
Dept. Manager Date

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