

BPW-1 11e.(2) PRE-SHIPMENT WASTE CHARACTERIZATION

MANUAL/PROCEDURE: BPW-1 11e.(2) PRE-SHIPMENT WASTE CHARACTERIZATION

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PURPOSE:

Incorporate changes from CAP and annual review

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11/08/96
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BPW-1 11e.(2) PRE-SHIPMENT WASTE CHARACTERIZATION**A. PURPOSE:**

This procedure is designed to characterize 11e.(2) wastes destined for disposal at the Envirocare South Clive Site to ensure that: the radioactive characteristics of the material are within license limits; the material is not a liquid waste and does not contain free liquids; the material is not a hazardous waste subject to RCRA regulations; and the waste material to be disposed is only 11e.(2) material.

B. REFERENCES OR AUTHORITY:

1. 11e.(2) Radioactive Material License SMC-1559, as amended
2. Application for 11e.(2) Radioactive Material License SMC-1559, as amended
3. Envirocare of Utah, Inc. Quality Assurance Manual, as revised
4. 40 CFR 261, as revised
5. Ground Water Quality Discharge Permit UGW450005, as amended

C. PRECAUTIONS AND LIMITATIONS:

1. Envirocare must obtain a certified description from the generator of each waste stream of 11e.(2) waste material to be managed at the Envirocare disposal facility prior to shipment.
2. Should a generator or waste owner send a shipment of waste to the Envirocare facility prior to receiving a Notice to Transport (EC-1800) from Envirocare, Envirocare must reject the shipment and provide notice of the rejection to the Nuclear Regulatory Commission (NRC).
3. Any waste which is determined to be a hazardous waste or to exceed the restrictions of Reference 1 shall not be disposed of in the 11e.(2) disposal cells. Such waste must be managed elsewhere in compliance with all other applicable regulations or returned to its place of origin.

D. GENERAL INSTRUCTIONS:

1. This procedure applies to all 11e.(2) waste destined for disposal at the Envirocare South Clive Disposal Facility.
2. Prior to shipment of 11e.(2) material, each generator or owner shall provide each of the following to Envirocare:
 - a. Certification that all waste material is 11e.(2) byproduct material (i.e., it originated from tailings or wastes produced by the extraction or concentration of uranium or thorium from any ore processed for its source material only).

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This certification is based upon the generator's or owner's documentation, or other court ordered documentation, of the source or origin of the waste.

- b. Certification that waste material does not contain any radioactive or hazardous wastes, other than that described above.
- c. License number, licensee, type of license, and date of license under which the waste material was produced.
- d. Total volume of byproduct material and the regulatory agency under which it was controlled.

3. Prior to shipment, Envirocare shall also obtain a statement of all radiological and non-radiological constituents in the waste, and the maximum and average concentrations of such constituents. This identification shall be documented by the following:

- a. Form EC-0650: When completed, this form should include a determination by the generator that the characteristics of the material are within those limits outlined in Reference 1 and provide analytical results for radionuclides.
- b. Form EC-0500: When completed, this form provides a physical description of the waste, including the constituents of the debris.
- c. Form EC-3200: When completed, this form provides waste profiling of non-radiological constituents for 11e.(2) waste.
- d. Certification by the generator or owner that the waste characterization was performed by pre-established methods that are either EPA approved, or methods standard in the industry and reasonably designed to identify the hazardous constituents contained in the waste. This certification shall be made by a responsible company authority.

4. Prior to shipment, an independent, third-party laboratory shall provide documentation that the generator's waste material is 11e.(2) byproduct material. Additionally, the third-party laboratory shall also document all nuclides present in the waste.

5. 11e.(2) RSR forms will be used for the documentation of each shipment. The RSR shall include certification that the shipment is 11e.(2) byproduct material, that it is the same type of material described by the generator in the generator's original certification, and that it does not contain other radiological or hazardous waste.

E. OPERATING INSTRUCTIONS:

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1. Prior to shipment, a description of the material to be managed at the Envirocare facility must be obtained (EC-0500, EC-0650, and EC-3200).
2. Upon receipt and review of all pre-shipment certifications provided by the generator and the independent laboratory, cognizant corporate authority shall evaluate the certification made by the owner or generator of the waste material. Envirocare shall then verify through independent means that the representations made of the waste are accurate by use of the following:
 - a. EC-0025: This form documents the corporate evaluation of the generator's physical waste profile as determined on the form EC-0500.
 - b. EC-0675: This form documents the corporate evaluation of the generator's radiological waste profile as determined on the form EC-0650.
 - c. EC-0325: This form documents the corporate evaluation of the generator's chemical waste profile.
3. Once the waste certification of characterization and analysis have been determined to meet the requirements of Reference 1, Envirocare Business Development must provide the generator with a Notice of Transport (EC-1800) prior to shipment of the waste to the Envirocare South Clive Site.
4. If any significant differences are discovered between the generator's certification and Envirocare's independent verification, they shall be reconciled prior to waste acceptance. Significant differences include, but are not limited to:
 - a. Origins of the material.
 - b. Radiological composition.
 - c. Hazardous constituents

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F. QUALITY CONTROL:

1. QC Process Control: Envirocare must obtain, and maintain on permanent file, cerification of all 11e.(2) material from the generator of each waste stream managed at the site disposal facility.
2. Sample Control: None.
3. Data Control: When completed, the following forms associated with pre-shipment waste characterization are retained in the operating record for a minimum of five years: EC-0650, EC-0500, and EC-1800. In addition to copies of the forms noted in F.3. above, the following forms associated with corporate review for acceptability of a generator's waste are retained in the corporate headquarter's files: EC-0025 and EC-0675.
4. Audit Requirements: None.