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**Signature of EDT Author:**  
**Date:** 6/19/95  
**Authorization of EDT:** N/A  
**Cognizant Manager:** N/A  
**Date:** 6/19/95  

**Revised Draft:**  
**Approved with Comments:** N/A  
**Disapproved with Comments:** N/A
RELEASE AUTHORIZATION

Document Number:  WHC-SD-WM-PLN-104, REV 0
Document Title:  Solid Waste Assurance Program Implementation Plan
Release Date:  6/20/95

This document was reviewed following the procedures described in WHC-CM-3-4 and is:

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2. Title
Solid Waste Assurance Program Implementation Plan

3. Number
WHC-SD-WM-PLN-104

4. Rev No.
0

5. Key Words
Solid Waste Assurance Program, SWAP

6. Author
Name: Lee G. Irons
Signature

7. Abstract
See section 1.0. Purpose.

8. RELEASE STAMP
OFFICIAL RELEASE BY WHC
DATE JUN 19, 1994
Stc. # 4
SOLID WASTE ASSURANCE PROGRAM

IMPLEMENTATION PLAN

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Prepared by the Westinghouse Hanford Company

for the

United States Department of Energy

Under Contract DE-AC06-87RL10930
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ACRONYMS AND ABBREVIATIONS

FY  fiscal year
GWAS  Generator and Waste Acceptance Services
RL  U.S. Department of Energy Richland Operations Office
SDAR  Storage/Disposal Approval Record
SWAP  Solid Waste Assurance Program
SWD  Solid Waste Disposal
SWITS  Solid Waste Information Tracking System
TRU  transuranic
TSD  treatment, storage, and/or disposal
WCS  Waste Certification Summary
WSS  Waste Specification System

REFERENCES

1) WHC-CM-5-34, Solid Waste Disposal Operations Administration.
4) WHC-IP-1159, Verification Program Manual For SWD Facilities.
1.0 PURPOSE

On June 6, 1995, a waiver to WHC-EP-0063-4, Hanford Site Solid Waste Acceptance Criteria, was approved by the U.S. Department of Energy Richland Operations Office (RL) to replace the low-level, mixed, and transuranic (TRU) generator assessment programs with the Solid Waste Assurance Program (SWAP). This is associated with a waiver that was approved on March 16, 1995 to replace the Storage/Disposal Approval Record (SDAR) requirements with the Waste Specification System (WSS). This implementation plan is to be used for phased implementation of the SWAP and these associated waivers. The SWAP is detailed in WHC-CM-5-34, Solid Waste Disposal Operations Administration, Section 1.6.

2.0 SCOPE

This implementation plan and the SWAP applies to Solid Waste Disposal (SWD) functions, facilities, and personnel who perform waste acceptance, verification, receipt, and management functions of dangerous, radioactive, and mixed waste from on- and off-site generators who ship to or within the Hanford Site for treatment, storage, and/or disposal (TSD) at SWD TSD facilities.

3.0 DEFINITIONS

All definitions and terminology associated with the SWAP is provided in WHC-CM-5-34, Section 1.6.

4.0 REPLACEMENT OF PREVIOUS PROGRAMS

The SWAP replaces three other programs for waste assurance that are currently in use:

1. Low-level Waste Certification Assessment Program (WHC-EP-0063-4, Section 3.2);  
2. Mixed Waste Certification Assessment Program (WHC-EP-0063-4, Section 4.2);  

4.1 Schedule

The low-level and mixed waste certification assessment programs (1 and 2) are to be replaced according to the following schedule:

immediate: all new generators of low-level and mixed waste will be subject to the SWAP;

The TRU waste certification program (3) will be replaced on the following schedule:

September 30, 1995: delete assessment program requirements and revise section 5, the Hanford Site waste acceptance criteria for TRU waste, of WHC-EP-0063-4;

October 1, 1995: all new generators of TRU waste will be subject to the SWAP.

5.0 PHASE IN OF GRANDFATHERED GENERATORS

Grandfathered generators are to be phased into the SWAP in accordance with the following schedule:

October 1, 1995: all on-site grandfathered generators of low-level and mixed waste will be subject to the SWAP;

January 1, 1996: all off-site grandfathered generators of low-level and mixed waste will be subject to the SWAP;

January 1, 1996: all TRU waste grandfathered generators will be subject to the SWAP.

Each grandfathered generator will have their final annual assessment in accordance with the previous programs by the dates listed above. Beyond thirty days after each grandfathered generator's final annual assessment, if the grandfathered generator wishes to continue shipment of waste to SWD TSD facilities, they must do so under the SWAP.

Once subject to the SWAP, each grandfathered generator must publish and provide to SWD Waste Acceptance a Waste Certification Summary (WCS) (in accordance with WHC-EP-0846, Waste Specification System) for each waste stream before any waste from the waste stream can be shipped to a SWD TSD facility. All waste streams from which the grandfathered generator has previously shipped are considered "shut down" until this is done. Once all issues with a WCS are resolved between SWD Waste Acceptance and the grandfathered generator, Waste Acceptance will hold a performance evaluation meeting to make the following determinations:

1. if the WCS defines a new waste stream for the grandfathered generator, a status of "Approved to submit shipment requests" is assigned to the waste stream and the waste stream is assigned an initial verification level of up to 100%, based upon the grandfathered generator's performance history;

2. if the WCS defines a waste stream from which the grandfathered generator has previously made shipments, a status of "Approved to submit shipment requests" is assigned to the waste stream and an initial verification percent is assigned in accordance with the following criteria:
grandfathered generators who had an APPROVED status under the previous programs will initially be subject to baseline verification of waste streams for which they were approved in accordance with WHC-IP-1159, Verification Program Manual for SWD Facilities;

grandfathered generators who had a LIMITED APPROVAL status under the previous programs will initially be subject to baseline waste verification of waste streams for which they were approved and up to 100% verification of waste streams for which they were not approved;

grandfathered generators who had a RESTRICTED or NOT APPROVED status under the previous programs will initially be subject to up to 100% verification of all waste shipments;

grandfathered generators whose approval status has expired for more than thirty days will be treated as if they were NOT APPROVED under the previous programs.

3. the verification facility to be used to verify a waste stream will be identified; and

4. if a waste stream is determined to be non-verifiable, the assurance activities to be conducted on the waste will be defined.

Prior to full implementation of the SWAP, grandfathered generators may continue to ship waste using the SDAR process in accordance with their current status under the previous programs, and will be subject to the requirements thereof.

6.0 GENERAL SCHEDULE ITEMS

Other items that affect implementation of the SWAP will occur on the following schedule:

- immediate: reorganize Generator Waste and Acceptance Services (GWAS) to align with the SWAP;
- immediate: modify the Solid Waste Information Tracking System (SWITS) to track conformance issues with shipments and provide conformance issue reports; use pre-shipment Portfolio review travellers until the SWITS modifications are implemented;
- immediate: modify SWD TSD facility and GWAS internal and operations procedures to implement the SWAP; use desk instructions until procedural modifications are complete;
7.0 BUDGET PLANNING

7.1 For Fiscal Year '95

Costs associated with implementation of the SWAP during FY '95 will be charged as follows:

- WSS reviews: Waste Certification Summary and Pre-Shipment Portfolio reviews in accordance with WHC-EP-0846; charge to generator assessment program ML accounts;
- baseline verification (1 to 10% in accordance with WHC-IP-1159); charge to verification program ML accounts;
- generator performance evaluation (monthly reviews of generators' performance in accordance with WHC-CM-5-34, Section 1.6); charge to generator assessment program ML accounts;
- TRU waste acceptance criteria revision; charge to TRUSAF account A3M47.

If a generator is subject to the SWAP within FY '95, additional costs, as defined in section 7.2, will be managed on a case-by-case basis.

7.2 For Fiscal Year '96

Budget planning for fiscal year (FY) '96 will incorporate the SWAP. Generators using the SWAP will be charged for the following baseline costs using ML accounts:

- WSS reviews,
- baseline verification,
- generator performance evaluation,
- generator assessments for offsite and TRU waste grandfathered generators whose final annual assessments occur between October 1, 1995 and January 1, 1996.

Additional costs that are a result of non-verifiable waste or poor performance by the generator will be charged to the generator. These include, but may not be limited to:

- extra costs associated with verification at the point of generation,
- recharacterization of waste,
- verification above baseline levels,
- resolution management of conformance issues,
- generator assessments.
Generator assistance will be available at extra cost. These services include, but may not be limited to:

- waste management program development,
- waste characterization,
- waste confirmation,
- waste designation
- waste documentation development,
- package identification and procurement.