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STATE OF WASHINGTON

DEPARTMENT OF ECOLOGY

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August 6, 2015

15-NWP-154

By certified mail

Ms. Stacy Charboneau, Manager
Richland Operations Office
United States Department of Energy
PO Box 550, MSIN: A7-50
Richland, Washington 99352

Mr. John A. Ciucci, President and CEO
CH2M HILL Plateau Remediation Company
PO Box 1600, MSIN: H7-30
Richland, Washington 99352

Re: Dangerous Waste Compliance Inspection on April 29, 2015 of the Waste Receiving and Processing Facility, Resource Conservation and Recovery Act (RCRA) Site ID: WA7890008967, Nuclear Waste Program (NWP) Compliance Index No. 15.520

Dear Ms. Charboneau and Mr. Ciucci:

Thank you for your time during the Waste Receiving and Processing (WRAP) facility inspection to determine compliance with the Washington State Dangerous Waste Regulations (Chapter 173-303 Washington Administrative Code). These regulations establish a system for safe and responsible management of dangerous waste.

The Department of Ecology's Compliance Report of the WRAP inspection is enclosed. The Compliance Report cites one violation of non-compliance with the Dangerous Waste Regulations.

If you have questions or need further information, please contact me at nancy.ware@ecy.wa.gov or (509) 372-7912.

Sincerely,

Nancy Ware

Nancy Ware
Dangerous Waste Compliance Inspector
Nuclear Waste Program

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EDMC

tkb

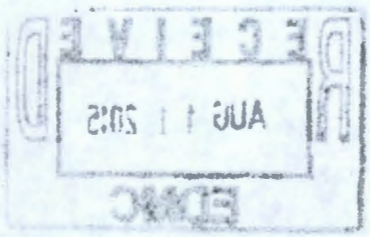
Enclosure

cc: See page 2

cc electronic w/enc:
Dave Bartus, EPA
Jack Boller, EPA
Dennis Faulk, EPA
Cliff Clark, USDOE-RL
Laura Cusack, CHPRC
Stuart Mortensen, CHPRC
Linda Petersen, CHPRC
Joel Williams, Jr., CHPRC
Jon Perry, MSA
Ken Niles, ODOE
Debra Alexander, Ecology
Kathy Conaway, Ecology
Kelly Elsethagen, Ecology
Edward Holbrook, Ecology
Stewart Luttrell, Ecology
Jared Mathey, Ecology
Deborah Singleton, Ecology
Ron Skinnarland, Ecology
John Price, Ecology
Nancy Ware, Ecology
Environmental Portal
Hanford Facility Operating Record
CHPRC Correspondence Control
USDOE-RL Correspondence Control

cc w/enc:
Steve Hudson, HAB
Administrative Record
NWP Central File
NWP Compliance Index File: 15.520

cc w/o enc:
Rod Skeen, CTUIR
Gabriel Bohnee, NPT
Russell, Jim, YN
NWP Reader File



Washington Department of Ecology

Nuclear Waste Program

Compliance Report

Site:	**Waste Receiving and Processing Facility**
RCRA Site ID:	**WA7890008967**
Inspection Date:	April 29, 2015
Site Contacts:	Joel Williams, Regulatory Inspection Lead, CH2MHILL Plateau Remediation Company (CHPRC)
Phone:	(509) 376-4782 FAX: N/A
Site Location:	200 West Area, Hanford Site Benton County, Washington
At This Site Since:	1997 NAICS#: 56221, 924110, 54171
Current Site Status:	Treatment, Storage, and Disposal Facility (TSDF)/Large Quantity Generator Operating Unit Group # 7

Ecology

Lead Contact: Nancy Ware Phone: (509) 372-7912 FAX: (509) 372-7971
Other Representatives: Kathy Conaway
Report Date: August 6, 2015
Index: #15.520
Report By: Nancy Ware

Nancy Ware (Signed) 8/6/2015 (Date)

Site Location

The Hanford Site was assigned a single United States Environmental Protection Agency (EPA) identification number, and is considered a single Resource Conservation and Recovery Act of 1976, as amended, (RCRA) facility even though the Hanford Site contains numerous processing areas spread over a large geographic area. The Hanford Site is a tract of land approximately 586 square miles and is located in Benton County, Washington. This site is divided into distinct Dangerous Waste Management Units (DWMUs) which are administratively organized into "unit groups." A unit group may contain only one DWMU or many; currently, there are 37 unit groups at the Hanford Site. Individual DWMUs utilize only a very small portion of the Hanford Site. Additional descriptive information on the individual DWMUs is contained in unit group permit applications and in Parts III, V, and VI of the Hanford Facility RCRA Permit, Dangerous Waste Portion, WA7890008967, Revision 8C (hereafter referred to as the Permit).

Owner/Operator

The United States Department of Energy – Richland Operations Office (USDOE-RL) is the owner of the Waste Receiving and Processing Facility (WRAP) and oversees waste management and cleanup activities ongoing on the Hanford Site. CHPRC is contracted by the USDOE-RL to operate WRAP and

corresponding DWMUs, including performing waste treatment, storage, and disposal (TSD) activities, conducting waste characterization, designation, manifesting, and transportation services.

Facility Background

The WRAP facility, Operating Unit Group #7, is located in the northwestern portion of the 200 West Area of the Hanford Facility, Benton County, Washington, and is adjacent to the north end of the Central Waste Complex (CWC). Operations for processing mixed low-level waste (MLLW) and transuranic mixed waste (TRUM) at the WRAP facility began in March, 1997. The WRAP facility can provide waste receipt, confirmation, repackaging, certification, and/or storage of dangerous, mixed, and radioactive waste from onsite generators or offsite generators, DWMUs, or as a result of operations. Future operations of WRAP are uncertain at this date.

The WRAP facility includes a waste shipping and receiving area, a nondestructive examination (NDE) area, a nondestructive assay (NDA) area, and a processing area. The processing area contains process enclosures (glove boxes) for opening, sorting, sampling, and treating the contents of the waste containers. The facility also includes a process support area, a sample management area, and an administrative area.

Compliance Background for WRAP

April 14, 2009 – The Department of Ecology (Ecology) conducted a compliance evaluation inspection (CEI) at the Hanford WRAP facility. Findings from the inspection include a violation for failure to provide separate containment for potentially incompatible wastes and a concern regarding an open Universal Waste (UW) lamps box.

March 14, 2011 – The National Enforcement Investigations Center (NEIC) conducted a CEI of the Hanford Solid Waste Operating Complex (SWOC), which included WRAP. Their inspection findings were provided to EPA and led to a Consent Agreement and Final Order (CAFO) between USDOE-RL and EPA issued in 2013, as discussed below.

May 20, 2011, July, 2011 and September 17, 2012 – Ecology conducted a focused inspection on the WRAP 2404WB Building after a container spill of mixed waste (MW). Based on Ecology's inspection and investigation, the following violations were:

1) Failure to timely notify Ecology of a release to the environment.
2) Failure to timely implement a Contingency Plan.
3) Failure to designate waste according to required procedures.
4) Failure to confirm knowledge about a dangerous waste (DW) before it is treated, stored, or disposed.
5) Failure to inspect the facility to prevent malfunction and deterioration, operator errors, and discharges which may cause or lead to the release of DW constituents to the environment, or a threat to human health.
6) Failure to take immediate remedial action when a hazard was imminent or has already occurred.
7) Failure to record on an inspection log or summary the date and notations of observations made and the date and nature of repairs or remedial actions taken.
8) Failure to adequately label containers with the major risk, and/or to maintain identification of containers.

9) Failure to ensure the compatibility of waste with containers.
10) Failure to protect containers.

An enforcement action led to negotiations between USDOE-RL and Ecology and as a result an Agreed Order. The Agreed Order and Stipulated Penalty was effective 1/24/2014, docket number DE10156.

June 26, 2013 – EPA, Region 10 filed a CAFO to resolve violations of RCRA at the USDOE-RL Hanford Facility that were identified by NEIC during an inspection at SWOC in 2011. The CAFO cited the following violations:

1) Operating eight DWMUs at SWOC without authorization.
2) Failure to have adequate closure plans for those units.
3) Failure to close or obtain an extension to operate two inactive DWMUs.
4) Failure to treat waste before placement inside of burial grounds inside SWOC as required by land disposal restriction requirements.

In the CAFO, USDOE-RL agreed to:

1) Submit closure plans for the eight units as permit modifications and to close those units according to the permit.
2) Immediately comply with applicable final TSD facility standards at these eight units.
3) Submit closure plans or get authorization for the two inactive units.
4) Cease treatment of waste within the low level burial grounds.
5) Pay a penalty of $137,000.

EPA, Region 10, referred eleven other DWMUs with respect to closure to Ecology for follow-up.

October 22, 2014 – Ecology conducted a focused inspection on the status of closure for the eleven DWMUs, their closure plans, and schedules, including units at WRAP as a follow-up to the EPA referral mentioned above. USDOE-RL indicated that the some of these units would be needed to meet clean-up milestones established through the Tri-Party Agreement, specifically the M-091 Series.

Inspection Summary

On Wednesday, April 29, 2015, Kathy Conaway and I performed a CEI of WRAP. At 10:30 a.m. we met USDOE-RL and CHPRC representatives at the WRAP Building 2336W Conference Room and introduced ourselves as DW compliance inspectors with Ecology. We were joined by the following individuals.

Tim Fulton, CHPRC Duty Operations Supervisor

Ted Hopkins, CHPRC Environmental

Stu Mortensen, CHPRC Facility Manager

Linda Petersen, CHPRC Environmental Compliance Officer (ECO)

Joel Williams, CHPRC Environmental Inspection Coordinator

After introductions, I identified myself as the lead inspector for this CEI and stated that it was a planned annual compliance inspection as required for federal facilities in Washington. I said this inspection was to determine compliance with the Interim Status TSDF requirements under 40 CFR 265, incorporated by

reference and updated by Washington Administrative Code (WAC) Chapter 173-303-400, as well as other applicable sections of WAC 173-303 for DW management. I stated that the scope of the inspection would include TSDF and generator activities; and the method of the inspection would include a visual walk-down of activities, discussions, and a review of any associated documents or records. I requested the container inventory listing for Satellite Accumulation Areas, 90 Day Areas, and TSD storage areas. Mr. Williams explained that he was waiting for Amanda Ramirez, CHPRC Project Manager, to bring us a copy of the inventory list.

I asked Mr. Mortensen if the schedules for WRAP inspections were included in facility procedures. He stated that the weekly inspection schedules (includes general inspections, facility, and process area) are listed in WRP1-SV-1605 and the monthly inspection schedules are listed in WRP1-SV-1703.

I requested the document name, number, and revision number for facility documents, and received the following information:

- HNF-2165, Revision 8, *Waste Receiving and Processing Facility Waste Analysis Plan*
- HNF-IP-0263-WRAP, Revision 19, *Building Emergency Plan for WRAP*
- PRC-STD-TQ-40230, Revision 0, *Waste Receiving and Processing Facility Dangerous Waste Training Plan*

I asked if the process for employee DW training at WRAP is the same as the other SWOC facilities (Central Waste Complex, T Plant, and Low Level Burial Grounds), and Mr. Mortensen and Ms. Petersen answered yes. I asked if the WRAP process for DW inspections was the same as CWC and T Plant, and Mr. Mortensen said the process is the same. I asked if WRAP uses the RCRA Open Items List for unsatisfactory findings. Mr. Mortensen said WRAP does not use the list; he stated that the RCRA Open Items List is specific to CWC. I asked how WRAP deals with unsatisfactory findings from inspections. He explained that the Nuclear Chemical Operators (NCOs) perform the inspections, and if any unsatisfactory findings are found during the inspections, the NCO lists the finding on the inspection sheet and also reports the finding to the Operations Supervisor. The Operations Supervisor would then log the finding into the WRAP Historical Turnover Checklist. Unresolved items would be placed on the Field Execution Schedule (FES), also known as Boone's List. Mr. Mortensen explained that, for example, WRAP performs annual roof repairs. The NCOs note on the inspection sheet if any leaks were found during an inspection, and whether it can be traced back to a roof leak. Roof leaks are listed on the WRAP Historical Turnover Checklist, and are placed on the FES for repair work to be done during May through September, based on priority with WRAP and CWC roof repairs. He explained that roof repair is a yearly maintenance activity because of the type of construction material used on the buildings and the effects of the temperature and the wind on the roof integrity. Repairs are performed during warm, dryer months, so repair work will not be hindered by rain, cold, or wind.

I asked if the process for manifesting and shipments, waste acceptance, and waste designations is the same for WRAP as for the other SWOC facilities, and Mr. Mortensen said yes. I asked if these duties are performed by the same staff as the other SWOC facilities, and he stated they were. I stated that because I had interviewed CHPRC staff on training, inspections, manifests and shipments, waste designation, and waste acceptance during other SWOC inspections during the last three months, I would not interview these same CHPRC staff again today.

Ms. Conaway asked for a breakdown of WRAP DWMUs, and if waste was being stored at each location. Mr. Mortensen and Ms. Petersen answered that 2336W is broken into several DWMUs, and

that there is no DW or MW currently in storage at 2336W. They also said there are multiple outdoor storage DWMUs at WRAP, but none are currently storing DW or MW. They told us that 2404WB is a DWMU with no current DW or MW storage, and that 2404WC is the only DWMU at WRAP with DW or MW inventory. Ms. Petersen explained that a letter had just been sent over the past week, from USDOE-RL to Ecology requesting an extension on closure of the empty DWMUs because a decision has not been made at this time for future use of the DWMUs.

NOTE: When we returned to the office, Ms. Conaway and I discovered that the letter discussed at the inspection (15-AMRP-0151) had been received in the Ecology office the prior day, April 28, 2015.

Ms. Ramirez joined us with the inventory lists. Mr. Williams read the list and stated that there are currently 26 containers of MW waste being stored at WRAP in the 2404WC building. I asked if there were any SAA or 90 Day Areas at WRAP, and Ms. Ramirez stated no.

We were informed that an emergency response drill would commence at 12:30 p.m., and if we were still at WRAP when the drill began, we would be required to remain in the building until the drill ended. In light of the time restrictions, Ms. Conaway requested Mr. Williams to take the photos and send us a copy of each photo he took. He agreed to take the photos and include copies with document submittals. Mr. Fulton led us to Room 125 in the 2336W Building to inspect a UW area. I observed a closed, plastic bucket labeled as "UW – Batteries-Alkaline," and a written accumulation start date of 11/18/2014. Ms. Petersen stated that WRAP also utilizes shop towel recycling and had one additional UW waste area in the tool crib, MO-2162. Mr. Fulton stated that this UW area also contained UW – Batteries. I stated that we did not need to view this area. Mr. Fulton explained that when maintenance crews do work at WRAP, they take their waste with them, such as fluorescent lights, oils, etc.

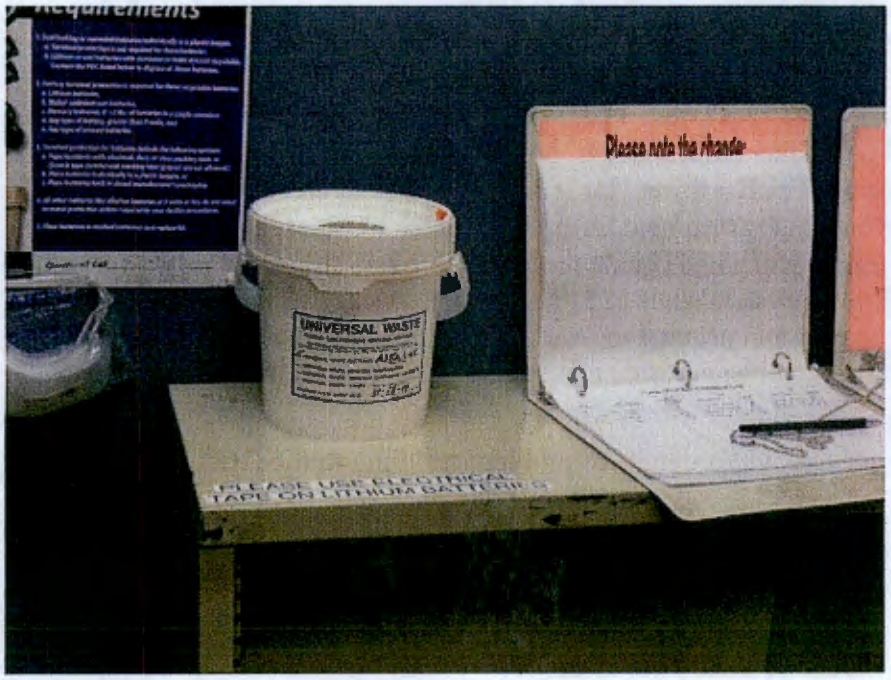
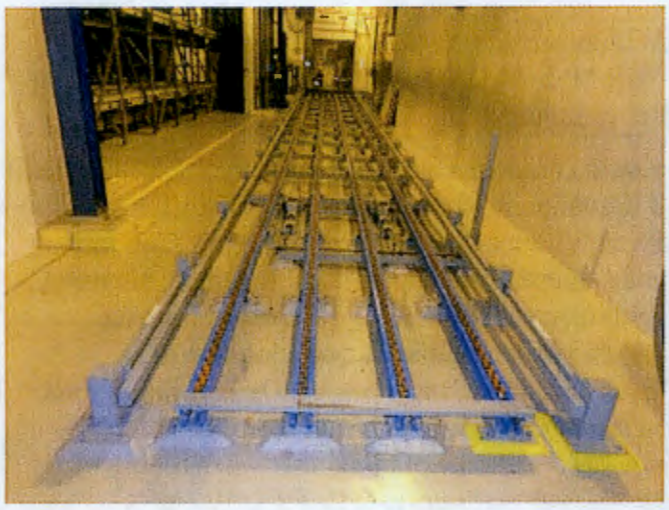


Photo DSC00767, Bldg. 2336W, Room 125, UW Container of Alkaline Batteries

As we made our way to 2404WC to inspect the MW containers in storage, Mr. Mortensen gave us a tour of the WRAP facility. He showed us the 101 Shipping and Receiving Area and the TRU-Pact Bay. We also observed the NDE and the NDA Area. He explained that x-rays are taken in the NDE area, and in the NDA area they performed assays to determine if waste is LLW or TRU waste. I asked what maintenance is performed in waste storage and process areas that are not currently active.
Mr. Mortensen explained that NCOs perform full DW inspections of the areas and document problems that require a remedy. He also said that the WRAP facility is fully maintained to accept additional DW or MW at any time.



Photos DSC00769 and DSC00770, Bldg. 2336W, Shipping and Receiving and NDE

We walked to 2404WC where I observed 24 metal drums labeled as DW, radioactive. I observed no problems with the containers of MW. Mr. Mortensen stated that WRAP had recently received two shipments from Perma-Fix Northwest Inc. (PFNW) – one shipment of 17 drums and another of 7 drums. He said the waste containers originated from the Hanford Engineering and Development Laboratory (HEDL) waste stream, which had been a problematic waste stream while in storage at CWC. He told us that CWC Operations sent the drums to PFNW to be repackaged and grouted. Mr. Mortensen said that once PFNW repackaged and grouted the waste containers, the drums were shipped back to WRAP for storage until the drums can be certified and sent to the Waste Isolation Pilot Plant (WIPP) for long-term storage.

NOTE: Attachment 1 provides details of problems relating to the HEDL waste stream.

Mr. Mortensen told us that the 2404WC building is climate controlled with a heating, ventilation, and air conditioning system; the temperature is maintained between 68 and 72 degrees. He said that SWOC maintenance supports both CWC and WRAP; and priority and need factors are evaluated weekly.
Mr. Mortensen stated floor repair and painting is performed by the SWOC maintenance pool as well, but roof repair is performed by a contractor. He said qualified NCOs and supervisors are in one pool, centralized out of CWC, and that they meet for a morning briefing every day to go over schedules and determine work activities and assignments.

Photos DSC00773 and DSC00774, Bldg. 2404WC, 24 MW containers of "HEDL" waste

As we walked back to the 2336W conference room, we observed a graveled area outside of the 2336W Building which was used for MW container storage. I observed that the area held no MW containers during the inspection.

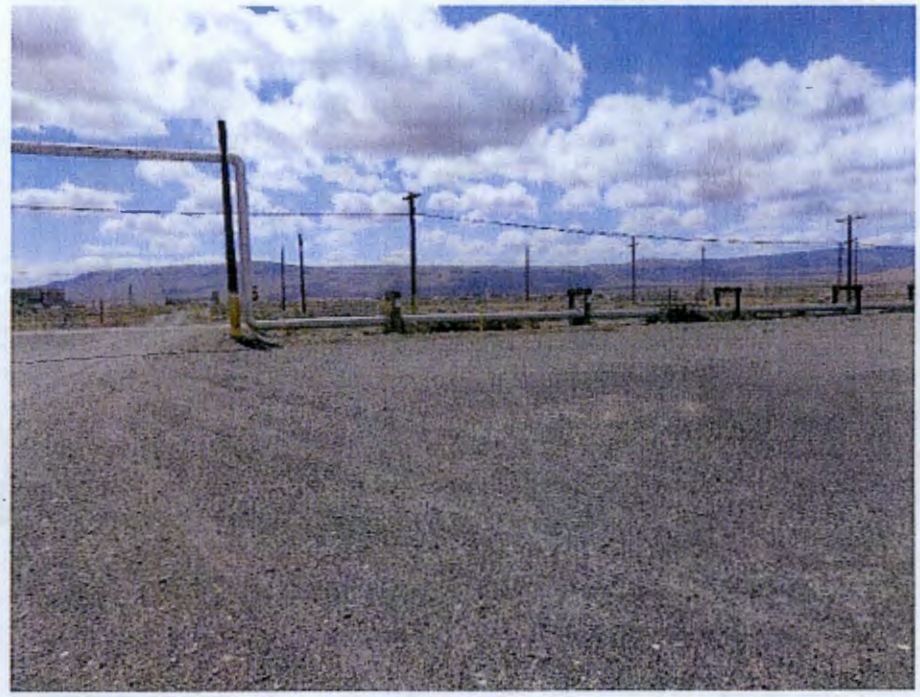


Photo DSC00775, gravel storage area outside of 2336W

We returned to the 2336W conference room. I asked where the facility contingency plan is maintained at WRAP. Mr. Mortensen explained that the WRAP contingency plan is made up of the building emergency plan (BEP) and the Hanford Emergency Management Plan, DOE/RL-94-02. He stated that a copy of the BEP is maintained at CWC, and a copy is maintained here at 2336W. Mr. Fulton showed us

a cabinet where the BEP is maintained in the conference room. I asked if WRAP had a single Building Emergency Director (BED). Mr. Mortensen explained that the BED is shared out of SWOC. There are two BEDs at T Plant and 2 BEDs at CWC. Whichever of these BEDs is on call would respond to an event at WRAP. I asked if WRAP had ever had a spill or release to the ground, and Mr. Mortensen answered no. Ms. Conaway asked if the contingency plan had been implemented in the last three years. Mr. Mortensen told us it had not.

I asked about the current operating status of the facility and what the future plans were. Mr. Mortensen said that because WRAP is listed as a Hazardous Category II nuclear facility, it must be maintained to minimum safety (min-safe) requirements. He told us that WRAP has been in a min-safe status since October, 2011. Mr. Mortensen stated that startup of the WIPP certification process at Hanford could be pushed out to 2019, so the future of the WRAP facility is uncertain.

Ms. Conaway asked who performed ignitable/reactive inspections and how they were performed. Ms. Petersen and Mr. Mortensen answered that the inspections are performed jointly by an Operations staff person (support) and a fire protection engineer. Ms. Petersen told Ms. Conaway that they had recently updated the process as the result of an internal audit of performance of these inspections. She explained that their practice was changed to produce a work package which encompassed the entire process from identifying areas where ignitable or reactive wastes are stored to performing the inspections. She said the facility ECO first determines where DW or MW has been stored during the year or where DW or MW could potentially be stored in the future; and a list of DWMUs is developed for the Operations personnel and fire protection engineer to perform their inspection.

I ended our inspection by stating that Operations appears to be performing inspections and maintenance activities in an appropriate and consistent manner. The facility appeared to be clean and well-maintained. I stated that I did not observe any violations of regulations during the inspection, and that we would continue our inspection of the facility with a records review back at our office. Ms. Conaway and I thanked the CHPRC staff for their time.

Because the drill was starting soon, Ms. Conaway and I drove to Building MO-287 in the 200 West Area to discuss records requests with Mr. Williams, Mr. Hopkins, and Kim Tarter, CHPRC Records. Building MO-287 is the record-keeping location for the SWOC facility, and Ms. Tarter is located there. Ms. Conaway asked Ms. Tarter if she could pull up the electronic record of the work package for the most recent ignitable/reactive inspection at WRAP. She retrieved the record from the Integrated Data Management System (IDMS), and we reviewed the work package. Ms. Conaway asked for a copy of the WRAP closure plan. Mr. Williams and Ms. Tarter said that it was in the WRAP operating record section of IDMS, but they were not able to retrieve the plan from IDMS after thirty minutes of searching. They stated they would locate the plan and give us a copy. Ms. Conaway stated that it is a problem if their WRAP facility operating record is a part of IDMS and the records that are requested at the time of an inspection cannot be provided.

I provided Mr. Williams with my records request and he agreed to provide the documents within two weeks. This concluded our inspection, and Ms. Conaway and I returned to the Ecology office.

Records Review

My document review began with the waste profiles provided to me for incoming waste streams from PFNW (treated Hanford Plutonium Finishing Plant waste) and Washington Closure Hanford (618-10 Burial Grounds waste). I observed no problems with the profiles. I also reviewed three product designations, and observed no problems with the designations. I reviewed one manifest with associated

LDR documentation for a WRAP outgoing shipment to PSC Environmental Services, LLC (the only shipment from WRAP during 2014 and 2015), and observed no problems with these documents.

I reviewed WRP1-SV-1703, WRAP-PRO-OP-52030, Revision 7, *Inspection of Safety/Emergency Response Equipment*, and WRP1-SV-1605, WRAP-PRO-OP-52204, Revision1, *WRAP Layup Surveillance*, with corresponding inspection records. WRP1-SV-1605, Appendix D, *Weekly Waste Storage Area Inspection,* states, **checking **'n/a'** indicates: □ no waste containers in storage; □ no spill pallets in use; □ no waste containers in the ACMP.* Inspection records reviewed for the period of October 2014 through March 2015 all have "n/a" markings on the records. It was unclear which one of the comments listed above apply. (e.g., are there no waste containers in storage or are there waste containers in storage, but none in the ACMP)

I reviewed PRC-STD-TQ-40230, Revision 0, *Waste Receiving and Processing Facility Dangerous Waste Training Plan.* WAC 173-303-330(1), Personnel Training, states that the facility owner or operator must provide a program of classroom instruction or on-the-job-training for facility personnel. WAC 173-303-040 defines "personnel or facility personnel" as

> *All persons who work at, or oversee the operations of, a hazardous waste facility, and whose actions or failure to act may result in noncompliance with the requirements of WAC 173-303-400 or 173-303-280 through 173-303-395 and 173-303-600 through 173-303-695.*

I observed that Table 3-1 – *Job titles/positions at the WRAP,* in PRC-STD-TQ-40230, identifies job titles/positions for personnel that carry out job duties relating to the WRAP waste management duties. The list of job titles/positions fails to include personnel who perform the following DW tasks:

- Prepare and/or maintain records as required in WAC 173-303.
- Provide training required under the DW training plan.
- Provide DW regulation interpretations that affect DW management operations.
- Are responsible for notifications as required in WAC 173-303.
- Perform emergency response efforts required under WAC 173-303.

In addition, WAC 173-303-330(2) states that,

> *The owner or operator must develop a written training plan which must be kept at the facility and which must include the following documents and records: (a) for each position related to dangerous waste management at the facility, the job title, the job description and the name of the employee filling each job. The job description must include the requisite skills, education, other qualification, and duties for each position; and (b) a written description of the type and amount of both introductory and continuing training required for each position.*

Section 3.0, Names, Job Descriptions, and Job Title/Positions, of the DW training plan, states that this information can be provided upon request.

I had requested training records for the WRAP Field Work Supervisor, a fire protection engineer, and four (4) NCOs. CHPRC submitted to me the requested training records, and I observed no problems with their training records.

I reviewed HNF-2165, Revision 8, *Waste Receiving and Processing Facility Waste Analysis Plan.* Section 2.5, *Discrepant Container Management*, states that the following are discrepant issues and will be tracked in the Discrepant Container Management Program (DCMP) until the issues are resolved.

Included in the list of issues are: indications of bulging, containers with unknown contents, containers holding waste prohibited under Section 1.2, containers no longer in good condition and not in compliance with 40 CFR 265.171, inconsistent inventory between container contents and the record, and unexpected liquids are found. 40 CFR 265.171 states,

> *If a container holding hazardous waste is not in good condition, or if it begins to leak, the owner or operator must transfer the hazardous waste from this container to a container that is in good condition, or manage the waste in some other way that complies with the requirements of this part.*

Placing containers of DW into a program indefinitely without a near-term schedule for correcting the problem is not consistent with 40 CFR 265.171.

Compliance Problems

The DW inspection on April 29, 2015 found the following compliance problems.

Each problem is covered in three parts:

(1) **Citation from the regulations.**

(2) **Specific observations** from the inspection that highlight the problem.

(3) **Required actions** needed to fix the problem and achieve compliance.

The last pages of this report are a 'Compliance Certificate' listing the violations and the actions required to gain compliance. This certificate must be returned to Ecology within 60 days of receipt. The certificate explains how to complete the form and return it to the Department of Ecology.

This does not relieve you of your continuing responsibility to comply with the regulations at all times.

1. **WAC 173-303-400, and by reference, WAC 173-303-330(2). Written training plan. The owner or operator must develop a written training plan which must be kept at the facility and which must include the following documents and records: (a) For each position related to dangerous waste management at the facility, the job title, the job description, and the name of the employee filling each job. The job description must include the requisite skills, education, other qualifications, and duties for each position;**

Observation: WRAP Facility DW Training Plan, Table 3-1 – *Job Titles/Positions at the WRAP*, identifies job titles/positions for personnel that carry out job duties relating to the WRAP waste management duties. The list of job titles/positions fails to include personnel (as defined in WAC 173-303-040) who:

- Prepare and/or maintain records as required in WAC 173-303.
- Provide training required under the DW training plan.
- Provide DW regulation interpretations which affect DW management operations.
- Are responsible for notifications as required in WAC 173-303.
- Perform emergency response efforts required under WAC 173-303.

Concerns:

1. WRP1-SV-1605, WRAP-PRO-OP-52204, Revision 1, *WRAP Layup Surveillance*, Appendix D, *Weekly Waste Storage Area Inspection,* states, **checking '**n/a**' indicates:* □ *no waste containers in storage;* □ *no spill pallets in use;* □ *no waste containers in the ACMP.* Inspection records reviewed for the period of October 2014 through March 2015 all have "n/a" markings on the records. It is unclear which one of the comments listed above apply. (e.g., are there no waste containers in storage or are there waste containers in storage, but none in the ACMP) When marking "n/a" on the inspection record, the NCO should clarify which comment applies on the inspection record.

Timeline for Waste Package 0035505 and related HEDL Containers	
Date	**Activity Description**
1978	Waste package HEDL-7815 was generated at the 340 Vault Facility and staged at the 325 Building for shipment to 200W.
5/18/1979	Waste package HEDL-7815 was shipped to 200W and placed into retrievable TRU storage at LLBG 218W-4C, Trench-4.
9/21/2006	Waste package HEDL-7815 was uncovered and placed in overpack container 0035505.
11/13/2006	Waste package 0035505 was transferred to the CWC and placed in 2403WA.
9/15/2008	Waste package 0035505 went through NDE at WRAP.
9/17/2008	Waste package 0035505 entered into the Discrepant Container Management Program (DCMP) for WIPP prohibited conditions (i.e., sealed container greater than four liters).
7/14/2010	Waste package 0035505 shipped back to WRAP for non-destructive assaying (NDA)
3/30/2011	Waste package 0035505 removed from DCMP program and the issue tracked by the TRU Certification Program (CCP).
7/20/2011	Waste package 0035505 was transferred from WRAP and placed into the 2403-WA Building for storage.
8/27/2013	During routine radiological surveys in the 2403-WA Building, corrosion blisters were observed on waste package 0035457 (note: no radiological contamination was found). The drum was evaluated by Operations and Engineering staff and was entered into the Abnormal Container Management Program (ACMP) and DCMP.
9/4/2013	During performance of the weekly RCRA inspections in the 2403-WA Building, corrosion blisters were observed on waste package 0035399. The drum was evaluated by Operations and Engineering staff and was entered into the ACMP and DCMP.
9/5/2013	Based on an extent of condition review, ten (10) other waste packages associated with waste packages 0035457 and 0035399 were inspected more closely at the CWC. Four (4) of these ten (10) packages did show corrosion signs but not to the extent noted for waste packages 0035457 and 0035399. One (1) of these four (4) additional waste packages was waste package 0035505. All twelve (12) packages were put on heightened surveillance and plans were initiated to segregate these packages out from the others in the building to enhance their inspection.
9/16/2013	Work began to mine out the twelve (12) HEDL waste packages in 2403-WA.
9/17/2013	Work completed to mine out the twelve (12) HEDL waste packages in 2403-WA. All packages were placed in a single row, one (1) drum per pallet so they could be more closely inspected.
10/15/2013	The purchase order for additional high performance overpack drums was placed with the drum supplier. We were provided an estimated delivery date of 11/20/2013.
11/13/2013	During performance of the weekly inspection, a small amount of viscous corrosion residue from two of the corrosion areas on waste package 0035505 had dripped down the drum and formed a thumbnail size mound at the drum-pallet interface. The ICP was manned and a recovery plan was developed. The waste package was entered into the ACMP and DCMP.
11/14/2013	The recovery plan was implemented and waste package 0035505 was overpacked into a 110-gal drum (ref: PIN 0087947).
11/18/2013	Corrosion on waste package 0035525 was determined to have worsened and the package was entered into the ACMP.
11/19/2013	Waste packages 0035457, 0035399 and 0035525 were overpacked into 110-gal drums (ref: PINs 0087948, 0088981, and 0088983 respectively).
12/3/2013	The new high performance overpacks were received into the Hanford warehouse located in Richland and are undergoing QA/QC acceptance inspections. Delivery of some of these new overpacks out at the CWC is now anticipated on 12/9/2013; at which time, the remaining eight (8) waste packages will be overpacked.