

LANL Waste Characterization, Reduction, and Repackaging Facility DOE ORR 7/21

ENVIRONMENTAL COMPLIANCE (EC)

OBJECTIVE

EC.1: LANL has established and implemented an Environmental Compliance program to ensure safe accomplishment of work and operations within the requirements of the BIO, TSRs, SER, and regulatory permits for WCRR Facility activities. Sufficient numbers of qualified personnel, as well as adequate facilities and equipment, are available to support WCRRF operations. **(CRs 1, 4, 6, 7, 9)**

CRITERIA

1. WCRRF has implemented the requirements for hazardous materials and waste management programs, as described in the WCRRF BIO and TSRs (WCRRF TSRs 5.6.9 and 5.10.2).
2. Environmental permits required for WCRR operations have been met. Processes are in place to ensure that these requirements are maintained. Environmental regulations include Resource Conservation and Recovery Act (RCRA), Toxic Substances Control Act (TSCA), National Emissions Standards for Hazardous Air Pollutants (NESHAP), Clean Water Act, etc. (DOE O 450.1)
3. WCRRF has appropriately planned to accommodate abnormal incidents in such a manner as to minimize environmental impacts. (DOE O 450.1)
4. WCRRF radioactive waste management procedures and processes are compliant with the LANL Radioactive Waste Management program and have been implemented (DOE O 450.1, DOE O 435.1).
5. The central Environmental Compliance organization is sufficiently staffed and trained to provide appropriate support to the WCRRF under normal operating conditions (DOE 450.1).
6. The central Environmental Compliance organization is sufficiently staffed and trained to respond to unplanned environmental releases (DOE O 450.1).
7. The level of knowledge of hazardous and radioactive waste management personnel concerning their roles and responsibilities for WCRR operations is adequate (TSR; DOE Order 5480.20A).

APPROACH

Requirements:

- 40 CFR Parts 60–63, 122, and 260 – 270
- DOE O 450.1, *Environmental Protection Program*
- DOE O 435.1, *Radioactive Waste Management*

Document Review:

- WCRR BIO and TSRs
- CORR final report and corrective action closure packages for findings
- Packaging and transportation plans and procedures for movement of material to and from WCRR
- Procedures for inspecting drums prior to shipment to WCRR and prior to acceptance at WCRR
- Radioactive Waste Management Program documentation in support of WCRR
- LANL assessment records associated with the radiation protection program, material packaging and transportation programs, and radioactive waste management programs as they apply to WCRR operations and activities
- RCRA Permit/Comprehensive Environmental Inspection Reports (pertinent to facility)

Interviews:

- WCRR Facility Manager
- WCRR work control shift supervisors
- Environment, Safety, and Health and Quality Assurance Managers
- Environmental Compliance personnel
- Facility Operations Manager
- Packaging and Transportation personnel responsible for WCRR
- Radioactive Waste Management personnel responsible for WCRR

Observations:

- WCRR operational demonstrations
- TRU waste arrival and pre-transfer inspections