

# DEVIATION FORM

<b>1. DEVIATION NO:</b> WCP-03-IES Cylinders DR-		<b>2. DIVISION:</b> EPWSD - X035	
<b>3. PROJECT TITLE:</b> IES Gas Cylinder Project		<b>4. PROGRAM:</b> Waste Certification Program Plan (WCPP)	
<b>5. ITEM/ACTIVITY NAME:</b> Program Applicability		<b>6. SPECIFICATION/PROCEDURE:</b> WCPP, Rev. 7	
<b>7. DRAWING NO:</b>	<b>8. SHOP ORDER:</b>	<b>9. WORK/PURCHASE:</b>	
<b>10. Description of Deviation</b>			
<p>The Waste Certification Program Plan, Section 2. Scope and Limitations, states, "UT-Battelle waste types covered under this program are solid low-level waste (SLLW) ... " Section 2 further clarifies that "A listing of waste types not included under this Program includes ... Recyclable materials that are not hazardous waste regulated under RCRA."</p> <p>WCPP requirements will not be applicable to secondary waste (including surface contaminated gas cylinders and associated items identified in "IES Packaging Plan for ORNL Gas Cylinder Carcasses Shipment to Envirocare") created by Integrated Environmental Services, Inc under the ORNL Gas Cylinder Project.</p>			
<b>11. Justification and Limitations</b>			
<ol style="list-style-type: none"> <li>1. The gas cylinders within the scope of this deviation were transported from ORNL to IES as product material.</li> <li>2. Radiological characteristics of the materials were determined by Laboratory Waste Services (LWS) staff using technically defensible methods and documented on the Bill(s) of Lading (BOL).</li> <li>3. Transport and processing of these cylinders were evaluated by appropriate UT-Battelle staff and documented in "IES Gas Cylinder Project Management Review Documentation" dated October 23, 2002.</li> <li>4. Following management review, the cylinders were shipped by UT-Battelle to IES.</li> <li>5. IES received the material and removed the contents of the cylinders. In processing the cylinders, they generated secondary waste.</li> <li>6. Secondary waste generated by IES will be characterized using the same data as represented on the BOL.</li> <li>7. From a mass balance perspective, no radioactive constituents have been added to or removed from the cylinders and associated waste.</li> <li>8. The waste will be packaged by IES as described in "IES Packaging Plan for ORNL Gas Cylinder Carcasses Shipment to Envirocare".</li> <li>9. As stated in the packaging plan, UT-Battelle staff will observe the actual packaging.</li> </ol>			
<b>12. Requested by:</b> M. I. Morris		<b>13. Title:</b> Project Manager	<b>14. Date:</b> 08/20/03
<b>15. Drawing/Document is to be revised</b> <input type="checkbox"/> NO <input type="checkbox"/> YES (if yes, list):			
<b>Approved by:</b>  <b>As Appropriate</b>	<b>16. Task Leader:</b>  M MORRIS	<b>Date:</b> 8/20/03	<b>19. Item User:</b>  <b>Date:</b>
	<b>17. Requirement Originator:</b> Darrell L. Daugherty 	<b>Date:</b> 8/20/03 08/20/03	<b>20. Other:</b>  <b>Date:</b>
	<b>18. QA Group</b>	<b>Date:</b>	<b>20. Other:</b>  <b>Date:</b>

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## 10. Description of Deviation

## 11. Justification and Limitations

10. UT-Battelle has submitted Envirocare Profile 8014-01, Revision 1.
11. Pending Envirocare approval, IES will verify adherence to Profile 8014-01 and ToxCo will prepare a draft manifest.
12. ToxCo will be listed as shipper and UT-Battelle will be listed as Generator/On behalf of Department of Energy.
13. UT-Battelle staff will review the characterization data included on the draft manifest.
14. ToxCo will sign as shipper.

Successful performance of the steps outlined above will provide reasonable assurance that equivalency to the certification requirements specifically stated in ORNL WCPP will be met.