

TABLE 1. TYPICAL ERRORS IDENTIFICATION AND DISPOSITION

Control Point (CP) 1. RFD Paperwork/Waste Package Reviewed by GI or GIE

Error Type (Block No. from Forms)	Error Disposition
Generator does not have current awareness training (W1)	Generator to take current awareness training
Charge number invalid (W5)	Generator to provide valid number
Radiological designation incorrect (W11)	Generator to indicate correct designation on WID (Link to W10)
Physical form incorrect (W16)	Generator correct physical form on the WID
WID attachment incorrect (W18)	Generator to indicate correct attachment
Accountable materials not indicated and/or form is missing/incorrect (W21/18 - Rad/Mixed Only)	Generator to supply missing information or correct
Waste description listed incorrectly (W29)	Generator correct waste description on the WID
Origin date is in the future (I2)	Generator correct the origin date to be in the present (or past)
90-day start date incorrect or missing (I3) - (Haz/Mixed when applicable)	Generator to indicate correct start date
PCB start date incorrect or missing (I6)	Generator to indicate correct start date
Declaration of absorbent materials presence incorrect (I7)	Generator to correct declaration
Outer container type is incorrect or missing (I15)	Generator to indicate correct outer container type
Health Physics instrument Identification not listed on WID (I16) (if required)	Generator request ORP to provide instrument numbers
Signatures missing on WID (S1, S3)	Generator and/or ORP to sign WIDs
RAD handling type incorrect (Rad/Mixed Only) (A22), (B2)	Generator to indicate correct Rad handling type
PK Form out of date (greater than 1 year old (R3)	Generator update PK form or Waste Stream Profile sheets
Fissile content not listed (R4) (Rad only)	Generator calculate fissile content for fissionable isotopes
Enrichment not listed (R5) (Rad only)	Generator calculate enrichment wt % if U-234, U-235, or U-238 is listed
Incorrect radioisotopes listed (mis-characterization of waste) (R7, R8, R9) (Rad only)	Generator correct the characterization method and list proper radioisotopes and quantities

Control Point (CP) 1. RFD Paperwork/Waste Package Reviewed by GI/GIE

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Error Type (Block No. from Forms)	Error Disposition
Declaration of RCRA and/or TSCA waste incorrect or missing (T3, T4)	Generator to provide correct designation
PCB concentration and/or source concentration incorrect or missing (T7, T8)	Generator to provide correct concentration values
Underlying Hazardous Constituent(s) not listed if present (T14) (RCRA or RCRA-treated)	Generator evaluate material for Underlying Hazardous Constituent(s) and list if appropriate
Mischaracterization of Haz waste (T10 - T15)	Generator to provide correct characterization data
Analytical data incomplete or missing	Generator complete or supply missing data
pH incorrect or missing (C7, D4)	Generator to provide correct pH if known
Flashpoint incorrect or missing (C3, D9)	Generator to provide correct flashpoint, if known.

Certification Process - Step 1

Error Type (Block No. From Forms)	Error Disposition
Generator does not have current awareness training (W1)	LWS/GI/GIE: Request generator to take current awareness training Generator: Take required awareness training.
GI/GIE does not have required training (S2)	LWS: Notify GI/GIE of training deficiency and return RFD package for review and signature by fully trained GI/GIE.
Charge number invalid (W5)	LWS: Inform generator of error, request valid charge number, and correct WID forms. Generator/GI/GIE: Provide valid charge number to LWSO and change WID template to prevent future errors.
Radiological designation inconsistent with waste type designation (W11)	LWS: Check with generator/GI/GIE and correct WID form if appropriate. Generator/GI/GIE: If error, note to prevent future errors.
Physical form designation inconsistent with provided or referenced data (W16)	LWS: Check with generator/GI/GIE and correct WID form if appropriate. Generator/GI/GIE: If error, note to prevent future errors.
Accountable materials not indicated and/or form is missing/incorrect (W21/I8 - Rad/Mixed Only)	LWS: Inform generator of error; request proper information and correct, if possible, or return to generator for correction. Generator/GI/GIE: Provide requested information or correct. Note to prevent future errors.
Waste description listed incorrectly (W29)	LWS: Inform generator of error, request proper information, and correct WID forms, or return to generator for correction. Generator/GI/GIE: Provide adequate waste description and change WID template to prevent future errors.
'WASTE MEETS NRC REQUIREMENTS' statement not entered in block W29 when Attachment C is used and waste is no-rad added	LWS: Request signed verification from generator to confirm "no rad added." Generator/GI/GIE: Provide no-rad added verification and change WID template to prevent future errors.

Certification Process - Step 1

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Error Type (Block No. From Forms)	Error Disposition
Origin date is in the future (I2)	<p>LWS: Inform generator of error, request proper data from generator and correct WID forms.</p> <p>Generator/GI/GIE: Provide proper date to LWSO and change WID template to prevent future errors.</p>
Container number not provided for waste submitted (I5)	<p>LWS: Inform generator of error, request container number from generator and correct WID forms.</p> <p>Generator/GI/GIE: Provide container number to LWS for 30 gallons or larger. (NOTE: waste container not overpacked need to be in DOT containers and be labeled with a container number.</p>
Outer container type is incorrect or missing (I15)	<p>LWS: Inform generator of error and request information to correct, if possible; or return to generator for correction.</p> <p>Generator/GI/GIE: Provide requested information or correct. Note to prevent future errors.</p>
HP instrument ID not listed on WID, if required (I16)	<p>LWS: Request generator to provide information.</p> <p>Generator/GI/GIE: Provide LWSO with instruments numbers.</p>
No neutron dose rate indicated when R7 contains neutron emitters (I16)	<p>LWS: Inform generator of error and request information to correct if possible; or return to generator for correction.</p> <p>Generator/GI/GIE: Provide requested information or correct. Note to prevent future errors.</p>
Signatures missing on WID (S1, S2, S3 if required)	<p>LWS: Request generator/GI/GIE to sign documents, return RFD if not signed within two working days.</p> <p>Generator/GI/GIE: Sign documents (provide HP signature if needed)</p>
PK Form or waste stream profile sheet out-of-date (greater than 1-year-old – R3)	<p>LWS: Request generator update PK form or Waste Stream Profile Sheet.</p> <p>Generator/GI/GIE: Sign documents (provide HP signature if needed)</p>

Certification Process - Step 1

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Error Type (Block No. From Forms)	Error Disposition
Fissile content not listed (R4 - Rad Only)	<p>LWS: Calculate fissile content, correct forms, and notify generator of correction.</p> <p>Generator/GI/GIE: NOTE FOR FUTURE WORK</p>
Enrichment not listed (R5) (Rad only)	<p>LWS: Calculate enrichment percent and correct forms, notify generator of correction.</p> <p>Generator/GI/GIE: Correct WID template enrichment percent for future waste streams.</p>
<p>Mischaracterization of rad waste, incorrect characterization method used (R7, R8, R9) – EXAMPLES:</p> <ul style="list-style-type: none"> -Large items with surface contamination characterized using method 4. -Waste item with nonstandard geometry characterized using method 4. -TRU waste and S LLW packaged in the same container (Rad only) 	<p>LWS: Request generator to correct characterization data. Offer LWSO assistance.</p> <p>Generator/GI/GIE: Correct the characterization data and list proper radioisotopes and quantities.</p>
<p>Mischaracterization of Haz waste (Attachment C T3-T15) – EXAMPLES:</p> <ul style="list-style-type: none"> -RCRA or TSCA determination -PCB concentration <p>(Note: excludes obvious typographical errors)</p>	<p>LWS: Request generator to correct characterization data. Offer LWSO assistance.</p> <p>Generator/GI/GIE: Correct the characterization method and list proper components and quantities.</p>
<p>Mischaracterization of mixed waste (Attachment D R7-10, T3-T15) – EXAMPLES:</p> <ul style="list-style-type: none"> -Radioisotopes incorrectly identified -RCRA or TSCA determination -PCB concentration <p>(Note: excludes obvious typographical errors)</p>	<p>LWS: Request generator to correct characterization data. Offer LWSO assistance.</p> <p>Generator/GI/GIE: Correct the characterization data and list proper radioisotopes and quantities.</p>
<p>Mischaracterization of non-WAC chemical (Attachment Z, T10 - T15) – EXAMPLES:</p> <ul style="list-style-type: none"> -Substance incorrectly identified -Concentration incorrect 	<p>LWS: Request generator to correct characterization data. Offer LWS assistance.</p> <p>Generator/GI/GIE: Correct the characterization data.</p>

Certification Process - Step 1

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Error Type (Block No. From Forms)	Error Disposition
Incorrect attachment used for waste stream – EXAMPLES: –Attachment A used for TRU waste –Attachment B used for mixed waste	LWS: Request generator submit waste on proper form. Generator/GI/GIE: Complete proper form.
Flash point or pH incorrect or missing (C3, C7, D4, D9)	LWS: Notify generator of error and make correction to WID forms. Generator/GI/GIE: Note to prevent future errors.
Errors on "Container Packing List" – EXAMPLES: –Block I5, Container ID Number, listed incorrectly. –Block I16, HP Tag number, dose rate at surface and 1 meter left blank. –Block P5, Pickup Facility left blank.	LWS: Inform generator of the error, correct paperwork if possible. Return RFD if not signed within two working days. Generator/GI/GIE: Correct paperwork and change WID template to prevent future errors.

Certification Process - Step 2

Error Type (Block No. from Forms)	Error Disposition
Gasket not in place or incorrectly installed on boxes	<p>LWSO: Notify generator of problem, repair gasket if minor, if not request generator to fix.</p> <p>Generator/GI/GIE: Repair/install gasket, inspect future boxes for proper gasket installation.</p>
Drum bolt not torqued to manufacturer's specified value	<p>LWS: Notify generator of problem, torque drum if possible, if not, request generator to torque drum(s).</p> <p>Generator/GI/GIE: Torque drum(s), inspect future drums for proper torque.</p>
Lock nut improperly placed on drum ring bolt	<p>LWS: Notify generator of problem, properly install lock nut on outside of drum lid ring if possible, if not, request generator to install nut.</p> <p>Generator/GI/GIE: Properly install lock nut on drum ring bolt, inspect future drums for proper lock nut placement.</p>
Rad tag missing or illegible, incomplete, or out of date on rad-waste/mixed waste box or drum	<p>LWS: Notify generator of missing or out-of-date rad tag.</p> <p>Generator/GI/GIE: Request HP to provide rad tag for the waste container and inspect future containers for proper rad tag placement.</p>
Physical integrity of waste container not acceptable, excess corrosion, rust, dents, or damage	<p>LWS: Notify generator of problem.</p> <p>Generator/GI/GIE: Repair or repackage waste into acceptable container. Inspect future containers to verify physical integrity is acceptable.</p>
Paperwork does not match waste container	<p>LWS: Notify generator of problem.</p> <p>Generator/GI/GIE: Correct paperwork to match waste container (i.e., wrong container type).</p>
Drum does not meet DOT spec. UN 1A2/X, UN 1A2/Y, or UN 6HA	<p>LWS: Notify generator of problem.</p> <p>Generator/GI/GIE: Repackage waste into acceptable container.</p>
Lids are taped onto containers.	<p>LWS: Notify the generator of the problem.</p> <p>Generator/GI/GIE: Repackage the waste into a container that has a tightly sealing lid. Inspect future waste container to ensure container has a tightly sealing lid.</p>

Certification Process - Step 2

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Error Type (Block No. from Forms)	Error Disposition
Container bar codes not applied/located per procedure.	LWS: Notify generator of problem. Generator/GI/GIE: Replace bar codes onto proper location.
Container number does not correspond to container number that is cross-referenced to container serial number, type or bar code.	WCO will issue a "Hold Tag" for the container in question pending resolution

Certification Process - Step 3

Reference Table 3

“Programmatic Self-Assessment Candidates”

Control Point (CP) 2. Certified Waste Package (hard copy) Transferred to Receiving Organization