

TABLE 2. QUALITY ASSURANCE VERIFICATION PROGRAM

- NOTE 1:** The verification frequencies specified in Table 2 are established by the lead WCO. Error data and surveillance results will be used to adjust Table 2 activity frequency, if necessary.
- NOTE 2:** The Non-Conformance Reporting (NCR) tracking system is utilized when an error is indicated in the Reporting & Tracking table.
- NOTE 3:** The Quality Services Division utilizes a random number selection program to implement the appropriate Table 2 reviews.

TABLE 2

WASTE TYPE: CH-SLLW & CH-TRU

QA OBJECTIVE 1	VERIFICATION FREQUENCY	IMPLEMENTED BY	EVALUATION METHOD	ERROR EXISTS IF	ERROR DISPOSITION	REPORTING & TRACKING
Confirm detectable WAC prohibited items are absent.	1 of every 10 waste containers for each GI/GIE for CH-SLLW 1 of every 10 waste containers for each GI/GIE for CH-TRU	Selection of containers by QSD (Table 2 Selection Program) Containers transported to/from inspection site by LWS Inspection by NDE	NDE	WAC prohibited items are detected	WCO to contact GI/GIE to determine location for remediation of waste container	WCO initiates NCR

WASTE TYPE: CH-SLLW, RAD COMPONENT OF MIXED & CH-TRU

QA OBJECTIVE 2	VERIFICATION FREQUENCY	IMPLEMENTED BY	EVALUATION METHOD	ERROR EXISTS IF	ERROR DISPOSITION	REPORTING & TRACKING
Verify PK Radiological characterization is credible	2 Rad WSPS/ month for CH-SLLW and/or Mixed wastes and/or CH TRU Note: There will typically be no more than one review per WSPS annually	QSD (Table 2 Selection Program) to select the WSPS . If/when necessary sampling and sample transfer to OEP, Special Projects Group	QSD to review methodology used compared to the specific method used to complete the characterization calculations. Sampling & analysis is required if RAD calculations are questionable.	Review indicates calculations are invalid. OR Analytical results deviation from RAD profile are unreasonable in the judgement of the SME	WCO to resolve error with WA coordinator, and/or generator/GI/GIE GI/GIE to correct Rad calculations to be consistent with resolution	WCO initiates NCR

WASTE TYPE: RH-SLLW AND RH-TRU

QA OBJECTIVE 3	VERIFICATION FREQUENCY	IMPLEMENTED BY	EVALUATION METHOD	ERROR EXISTS IF	ERROR DISPOSITION	REPORTING & TRACKING
Verify PK waste characterization basis is credible	1 WSPS per month. NOTE: These will typically be no more than one review per WSPS annually	QSD (Table 2 Selection Program) to select WSPS	Assessment of rationale used to develop PK data by interview and review of records with generator/GI/GIE	Assessment indicates basis for WSPS data is invalid	SME, WCO, and generator/GI/GIE to determine an acceptable characterization approach. NCR will determine disposition	WCO initiates NCR

WASTE TYPE: CH-TRU, RH-TRU, CH-SLLW, AND SLLW

QA OBJECTIVE 4	VERIFICATION FREQUENCY	IMPLEMENTED BY	EVALUATION METHOD	ERROR EXISTS IF	ERROR DISPOSITION	REPORTING & TRACKING
Confirm detectable WAC prohibited items are absent	2 WSPS/month NOTE: There will typically be no more than one review per WSPS annually	QSD (Table 2 Selection Program) to select WSPS	An assessment of the rational used to make the declaration of " no RCRA/PCB " will be completed by review of records and data in the possession of the generator and/or GI/GIE	WAC prohibited items are detected	Waste container will be returned to generator for remediation. NCR will determine disposition	WCO initiates NCR

WASTE TYPE: HAZARDOUS / NON-REGULATED

QA OBJECTIVE 5	VERIFICATION FREQUENCY	IMPLEMENTED BY	EVALUATION METHOD	ERROR EXISTS IF	ERROR DISPOSITION	REPORTING & TRACKING
Verify PK basis is valid for NRA declaration	2 PK forms per month NOTE: There will typically be no more than one review per PK form annually	QSD (Table 2 Selection Program) to select PK forms Assessment by QSD Sampling & sample transfers by OEMP (if/when necessary) Selection of analytical lab by WCO	Assessment of PK rationale and data used to develop/support NRA declaration by interview and review of records with generator/GI/GIE If basis is questionable, NRA sampling and analysis protocol in ORNL-WM-005 to be employed	Basis of PK NRA claim is invalid OR Analytical results confirm presence of Rad above the protocol and specified by procedure ORNL-WC-005	Correct PK logic/documentation or reclassify waste as mixed and prepare correct WID. NCR to determine disposition	WCO initiates NCR

WASTE TYPE: HAZARDOUS AND HAZARDOUS COMPONENT OF MIXED

QA OBJECTIVE 6	VERIFICATION FREQUENCY	IMPLEMENTED BY	EVALUATION METHOD	ERROR EXISTS IF	ERROR DISPOSITION	REPORTING & TRACKING
Verify characterization of hazardous waste characterized by PK is appropriate	2 PK forms per month each with an associated WID NOTE: There will typically be no more than one review for each PK form annually	QSD (Table 2 Selection Program) to select PK and the associated WID If necessary, sampling & sample transfers by OEMP, Special Projects Group Selection of analytical lab by WCO	Compare analytical results of sample from selected WIDs to PK declared characterization	Analytical results and PK differ beyond reasonable technical reconciliation (SMEs used when necessary)	Correct characterization of waste Correct PK basis/data or discontinue use Correct associated WID to reflect appropriate characterization. NCR to determine disposition.	WCO initiates NCR

WASTE TYPE: HAZARDOUS, HAZARDOUS COMPONENTS OF MIXED, CH-SLLW, AND CH-TRU*

QA OBJECTIVE 7	VERIFICATION FREQUENCY	IMPLEMENTED BY	EVALUATION METHOD	ERROR EXISTS IF	ERROR DISPOSITION	REPORTING & TRACKING
Confirm analytical results are valid by review of (1) analytical methodology, (2) holding times, and (3) instrument calibration.	1 WID every 4 months for one of the above waste types NOTE: There will typically be no more than one evaluation of an analytical laboratory per year	QSD (Table 2 Selection Program) to select the WID and SME. SME(s) to complete the review, if necessary	Assessment of analytical records.	Appropriate analytical method(s) not used, holding time(s) missed, and/or instrument calibration(s) out of date.	Re-analyze for missed/incorrect parameters. NCR to determine disposition	WCO initiates NCR

***ONLY FOR WASTE CHARACTERIZATIONS BY SAMPLING AND ANALYSIS, NOT PROCESS KNOWLEDGE (PK)**

WASTE TYPE: MIXED

QA OBJECTIVE 8	VERIFICATION FREQUENCY	IMPLEMENTED BY	EVALUATION METHOD	ERROR EXISTS IF	ERROR DISPOSITION	REPORTING & TRACKING
Verify that analytical results have been appropriately applied to characterize RCRA/PCB	1 WID/month	QSD (Table 2 Selection Program) to select the WID	Assessment of rationale used to develop RCRA PK data by interview and review of records with generator/GI/GIE	Assessment indicates basis for PK data is invalid	WCO, LWS and generator/GI/GIE to determine an acceptable characterization method	WCO initiates NCR

WASTE TYPE: ALL - WHERE SAMPLING AND ANALYSIS IS USED FOR CHARACTERIZATION

QA OBJECTIVE 9	VERIFICATION FREQUENCY	IMPLEMENTED BY	EVALUATION METHOD	ERROR EXISTS IF	ERROR DISPOSITION	REPORTING & TRACKING
Ensure the sampling plan is adequate and the sampling event is consistent with the sampling plan	1 WID every 4 months	QSD (Table 2 Selection Program) to select WID	QSD or designee to review sampling plan and observe sampling event.	Sampling plan is deficient Sampling event deviates from sampling plan	Correct the plan and/or resample NCR to determine disposition	WCO initiates NCR

WASTE TYPE: HAZARDOUS AND NON-REGULATED

QA OBJECTIVE 10	VERIFICATION FREQUENCY	IMPLEMENTED BY	EVALUATION METHOD	ERROR EXISTS IF	ERROR DISPOSITION	REPORTING & TRACKING
Verify that containers of Hazardous Waste declared NRA meet UT-Battelle Radiation Protection Program surface contamination/ radiation requirements for free release (i.e., are green-tagable)	10% of NRA hazardous/waste/ non-regulated waste population	Selection of items for survey by QSD (Table 2 Selection Program) Survey performed by UT-Battelle qualified RCTs	Standard ORP procedure(s) for performing Radiological surveys under RPP 420	Item is determined to be Radioactive/ Radioactively contaminated by RPP 420 protocol	WCO to notify generator/ GI/GIE Determine extent of error with respect to other items and remove from classification as NRA Convene SMEs to analyze and correct cause/source of misclassification	RCT*s to submit all survey reports to QSD WCO initiates NCR (*Radiological Control Technician's)

WASTE TYPE: HAZARDOUS, NON-REGULATED, AND MIXED

QA OBJECTIVE 11	VERIFICATION FREQUENCY	IMPLEMENTED BY	EVALUATION METHOD	ERROR EXISTS IF	ERROR DISPOSITION	REPORTING & TRACKING
<p>Verify that the waste item, volume, physical form, inner container, and container label listed on the <i>Container Log-in Sheet(s)</i> (CLS) agree with the waste item description within the lab pack</p> <p>NOTE: These waste items will be represented by one Waste Pickup Request (WPR)</p>	<p>A minimum of 10% of the waste containers will be reviewed. If there are discrepancies between the CLS and the lab-packed items in the container, the inspection frequency will increase to 100% inspection of the containers. The 100% inspection rate will continue until 7 consecutive containers have been inspected & no errors have been detected. At that point, the container inspection rate will return to 10%</p>	<p>QSD (Table 2 Selection Program) to select containers for review</p> <p>Verification of the above stated objective will be completed by personnel from the Transportation & Management (TPM) Department (ORNL Logistical Services Division)</p>	<p>Compare the items on the log-in sheet with the items in the waste container to ensure they are the same</p>	<p>The items on the CLS are different from the item(s) in the package</p>	<p>The WCO will notify the person that completed the packing of any errors. After remediation of the errors, but prior to resealing the package, LWS will notify the WCO that the package is ready for a second review. ORNL LS/TPM will verify the package has been properly remediated.</p>	<p>The WCO initiates NCR</p>

WASTE TYPE: HAZARDOUS, NON-REGULATED, AND MIXED

QA OBJECTIVE 12	VERIFICATION FREQUENCY	IMPLEMENTED BY	EVALUATION METHOD	ERROR EXISTS IF	ERROR DISPOSITION	REPORTING & TRACKING
<p>Verify that the package meets the appropriate DOT requirements for compatibility, cushioning, labeling, container volume, DOT class, correct containers, etc.</p>	<p>A minimum of 10% of the waste containers will be reviewed. If the package does not meet the appropriate DOT requirements the inspection frequency will increase to 100%. The 100% inspection rate will continue until 7 consecutive containers have been inspected & no errors have been detected. At that point, the container inspection rate will return to 10%</p>	<p>QSD (Table 2 Selection Program) to select containers for review</p> <p>Verification of the above stated objective will be completed by personnel from the TPM (ORNL Logistical Services Division)</p>	<p>Determine if the package meets the appropriate DOT requirements.</p>	<p>The package does not meet the appropriate DOT requirements</p>	<p>The WCO will notify the person that completed the lab-packing of any error(s). After remediation of the error(s), but prior to resealing the package, LWS will notify the WCO that the package is ready for a second review. ORNL TPM will verify the package has been properly remediated</p>	<p>WCO initiates NCR</p>

WASTE TYPE: CH-SLLW

QA OBJECTIVE 13	VERIFICATION FREQUENCY	IMPLEMENTED BY	EVALUATION METHOD	ERROR EXISTS IF	ERROR DISPOSITION	REPORTING & TRACKING
Verify that WIDs/ DOCs listed on the CLS are contained in the waste container	Subject waste type containers will be opened as requested by the WCO	Selection of the waste container for review will be determined by the QSD (Table 2 Selection Program). The review will be conducted by the QSD or QSD designee	Review of waste items in the waste container against the WIDs represented in the selected CLS	The items in the waste container do not agree with the WIDs listed in the CLS	The QSD will notify the WCO of the error.	WCO initiates NCR