CMP Retrieval

Effective Date: 03/11/2020
Next Review Date: 03/11/2023

Hazard Class: □ Low  □ Moderate  □ High/Complex
Usage Mode: □ Reference  □ UET  □ Both UET & Reference

The Responsible Manager has determined that the following organizations’ review is required for initial procedure release as well as subsequent major revisions. Review documentation is contained in the Document History File.

- Shift Operations Manager
- Criticality Safety
- Operator SME
- Radiation Protection
- Industrial Hygiene and Safety
- Safety Basis
- Regulatory Compliance
- Maintenance SME
- Training
- Waste Operations Team Lead
- Environmental Protection
- Waste Management
- Quality Assurance
- Fire Protection
- Facility Engineer
- Waste Engineer

Classification Review: □ Unclassified  □ UCNI  □ Classified

Tracy Drake / 140891 / Signature on File / 02/25/2020
Name (print)  Z#  Signature  Date

Responsible Manager, N3B Waste Operations Manager

James P. O’Grady / 115358 / Signature on File / 02/24/2020
Name (print)  Z#  Signature  Date

Working Copy / Information Only (circle one)
Initials / Date: ________ / ________
## REVISION HISTORY

<table>
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<th>Issue Date</th>
<th>Action</th>
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<td>N3B-DOP-TRU-2135, R.0</td>
<td>March 11, 2020</td>
<td>New</td>
<td>New procedure for performing CMP retrieval at TA-54 Area G.</td>
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1. PURPOSE

This procedure provides instructions for Corrugated Metal Pipe (CMP) retrieval performed at Pit 29 within Technical Area 54 (TA-54), Area G.

2. SCOPE

Execution of this procedure involves the efforts of multiple groups, such as CH-TRU Waste Retrieval Operations, Waste Storage Operations, and Maintenance.

Retrieval operations described in this procedure include:
- Pit 29 CMP AREA site preparation
- CMP retrieval and staging
- Non-routine activities

This procedure is to be used in conjunction with other documents to complete CMP activities:
- N3B-DOP-TRU-2136, CMP Intra-Facility Transfer
- N3B-PLAN-TRU-1033, TA-54 Area G Soil Management Plan
- N3B-PLAN-TRU-2008, CMP Retrieval Storm Water Control Measures Plan

This procedure does not cover the excavation of the Pit 29 ramp, removal of six (6) feet of overburden on CMPs, or replacing overburden back into Pit 29. These excavation activities will be covered under work control documents developed in accordance with N3B-AP-300-1, Integrated Work Control Process.

Section 6, Non-Routine Operations, provides instructions for situations that may potentially occur, and have been evaluated during development of the N3B-DOP-TRU-2135 Hazard Analysis, TA-54 Pit 29 CMP Retrieval Hazard Analysis. These subsections may be entered and performed anytime during the performance of this procedure.
3. PRECAUTIONS AND LIMITATIONS

3.1 General Task Hazards and Controls

- General site hazards and controls are provided in N3B-AP-TRU-1001, General Site Hazards and Controls. Personnel performing activities associated with this procedure shall meet facility access criteria, recognize the associated site hazards, and uphold the established associated controls.

- Non-routine events encountered during performance of this procedure are documented in comments section of Attachment 1, CMP Retrieval Checklist. Guidance provided by the Person in Charge (PIC) or TA-54 Operations Center, as well as follow-on actions, should also be documented therein.

- Weather conditions shall be continuously monitored during CMP retrieval through the TA-54 Operations Center, which alerts the CMP retrieval team when retrieval operations must be suspended.

- Workers in the lift area shall wear hard hats and reflective vests during heavy equipment operations.

- Personnel working with and/or in the vicinity of excavator and other industrial equipment must wear appropriate hearing protection as determined and directed by the Industrial Hygiene and Safety representative.

- Industrial Hygiene and Safety establishes Personnel Protective Equipment (PPE) requirements and airborne exposure monitoring controls during CMP retrieval.

- Tarps and plastic sheeting used during CMP retrieval shall comply with the requirements of NFPA 701, Standard Methods of Fire Tests for Flame Propagation of Textiles and Films.

- Supplies in support of CMP retrieval, such as plastic/tarps, straps, and tape, must be stored/staged in an approved location per the Fire Protection Manager. Only enough supplies to prepare for one shift of CMP activities will be available at the retrieval site.

- Dust suppression activities during CMP retrieval are performed in accordance with an approved work control document. Water used for CMP retrieval dust suppression will be tracked and reported to Regulatory Compliance.
3.2 Safety Basis

- Procedure steps marked with the ($) symbol implement Technical Safety Requirements (TSRs) which failure to complete or meet could cause a TSR violation as described in Section 5.3.3 of the TSRs. These steps may not be changed without the approval of the Engineering Manager.

- Forklifts used for CMP retrieval and staging are excluded from Specific Administrative Controls (SAC) 5.7.8.4 and SAC 5.7.20 requirements based on the forklift’s limited lift height.

3.3 Criticality Safety

- No criticality safety requirements are associated with the CMP retrieval activities per N3B-NCSD-19-001, Nuclear Criticality Safety Determination for Corrugated Metal Pipe Retrieval and Storage.

3.4 RCRA and Environmental

- Procedure steps marked with the (&) symbol implement key requirements associated with the Resource Conservation and Recovery Act (RCRA) or other environmental regulatory requirements. These steps may not be changed without Regulatory Compliance approval to ensure that applicable limits are maintained.

- Abnormal conditions, events, or activities must be reported to Regulatory Compliance for evaluation against regulatory reporting criteria.

- Requirements associated with Hazardous Waste Permit (HWP), Part 3, Subsection 3.3, Acceptable Storage Containers, and subsection 3.6(1), Waste Container Labeling are incorporated into this procedure.
4. **PREREQUISITE ACTIONS**

Prerequisite actions may be completed in any order and/or concurrently.

4.1 **Planning and Coordination**

PIC

[1] **ENSURE** that this procedure is the latest revision and **IDENTIFY** this document as a “Working Copy” on the Title Page.

[2] **ENSURE** that a pre-job briefing is conducted for personnel involved in the performance of this procedure in accordance with N3B-AP-TRU-1101, Pre-Job Briefings.

[3] **ENSURE** that the following personnel are available and trained for the performance of this procedure:
   - One (1) Competent Person (ES&H for Pit 29 inspection prior to retrieval operations)
   - One (1) Person In Charge (PIC)
   - One (1) Field Coordinator
   - Three (3) Radiological Control Technicians (RCTs)
   - Two (2) Heavy Equipment Operators
   - Two (2) Laborers
   - Three (3) Waste Operators

**NOTE**  *Attachment 1, CMP Retrieval Checklist, may be used to document the retrieval of multiple CMPs during a single shift.*

[4] **INITIATE** a copy of Attachment 1 and **RECORD** the retrieval date.

[5] **REVIEW** weather and wind forecast for the day to determine if anticipated conditions support outdoor CMP activities.

[6] **ENSURE** that the inspection sheet is complete for the work location in accordance with N3B-DOP-TRU-1105, Work Release Inspection Sheets.

[7] **ENSURE** that DEFINED AREAS involved in the work activities are in OPERATION MODE and that TA-54 Area G is in Staffing Condition 1.

[8] **ENSURE** the Pit 29 excavation site has been inspected by a Competent Person and **DOCUMENT** inspection on Attachment 1.

4.1 Planning and Coordination (continued)
[9] **ENSURE** that forklift, industrial truck, and heavy equipment (e.g., excavator, front-end loader, backhoe) inspections are completed in accordance with applicable policy (e.g., N3B-DOP-TRU-1305, Forklift and Drum Handler Equipment Operations) and **DOCUMENT** on Attachment 1.

[10] **ENSURE** a High Consequence Material Handling Activity Form (N3B-Form-2041) is approved and available for forklift operations and **DOCUMENT** on Attachment 1.

[11] **ENSURE** approved secondary waste containers are available at the excavation site.

### 4.2 Performance Documents

**PIC**

[1] **ENSURE** that the following documents are approved and available:

- CMP Excavation Permit
- N3B-PLAN-TRU-1033, CMP Soil Management Plan
- N3B-PLAN-TRU-2008, CMP Retrieval Storm Water Control Measures Plan
4.3 Materials and Equipment

4.3.1 Tools and Equipment

**Waste Operators/Laborers**

[1] **ENSURE** that the following tools and equipment are available:

- Area boundaries and signage
- Cargo/ratchet tie-down straps
- Chocks/blocks for securing CMPs
- Combustible storage
- Dust suppression equipment (water truck and hose attachment)
- Equipment/personnel decontamination supplies
- Excavator
- Fall Protection barriers/rails
- Fire extinguishers
- Forklift
- Front end loader
- Hand tools for soil removal (e.g., spade, shovel, hoe, broom)
- Hydration station
- Mobile eyewash station
- Plastic pallets
- Radiological control equipment
- Roll plastic
- Secondary waste container(s)
- Spill kit
- Water truck for dust suppression

4.3.2 Consumables and Supplies

**Waste Operator/Laborers**

[1] **ENSURE** that the following consumables and supplies are available:

- Cargo-pit tape
- Fire retardant tarps/plastic (NFPA 701 compliant)
- O-ring bags
- Spill kits
5. PERFORMANCE – CMP RETRIEVAL AND STAGING

Radiological surveys may be performed at any time as deemed necessary by the RCT. Any time radiological contamination is discovered, personnel will follow direction provided by the RCT.

This section provides instructions for CMP retrieval and staging.

PIC

[1] ENSURE that Section 4, Prerequisites Actions, has been completed and DOCUMENT on Attachment 1.

[2] NOTIFY the TA-54 Operations Center that CMP retrieval activities are ready to begin.

---

WARNING

Excavation of soil may create airborne dust which potentially contains silica. Operators must ensure dust suppression activities are performed to minimize the release of airborne silica.

---

NOTE The following Step 5.[3] pertains only for performing the excavation of the remaining overburden over the CMPs.

Excavator Operator

[3] EXPOSE the CMPs intended for retrieval, which involves the following recurring activities:

- Dust suppression.
- Soil/overburden removal to expose the buried tarps/plastic.
- Excavated soil/overburden transfer to designated collection area.
- Soil pile construction on each end of the CMP for top tier retrieval.
- Tarps/plastic and plywood collection for disposal.

NOTE Secondary waste container must be noncombustible and must be located at least 25 feet from the edge of the pit, and at least 50 feet away from any structure. The container must be normally covered. Whenever possible, a noncombustible or fire resistant cover should be placed over waste containers.

Laborers


Waste Operator

[5] PERFORM a visual inspection of the CMP for exterior damage that would prohibit lifting.
5. PERFORMANCE – CMP RETRIEVAL AND STAGING (continued)

Waste Operator/Laborer

[6] **MARK** center point and forklift tine placement points on the CMP using a marker, spray paint, or tape.

[7] **BLOCK** or **SECURE** lower tier CMPs.

**NOTE**  *Plastic pallets in the following step are used to stage the retrieved CMP for inspection and debris removal. Pallet spacing must accommodate the length of the CMP and allow for placement of forklift tines.*

[8] **ENSURE** plastic pallets are stages on a level surface at least 15 feet from the CMP stack.

PIC

[9] **WHEN** CMP is exposed and ready for retrieval,

**THEN ENSURE** non-essential personnel are clear of the active work area.

Excavator Operator

[10] **IF** retrieving a top-tier CMP,

**THEN REPOSITION** the CMP from top tier onto dirt piles using the excavator.

---

**WARNING**

1: Forklift operator must position the forklift in the center directly in front of the CMP. Failure to comply with this warning could lead to loss of load and damage to CMP when handling.

2: Forklift operator must use extreme caution when approaching the CMP to prevent puncturing the forklift tines into the CMP. Failure to comply with this warning could lead to load damage and radiological contamination release to the environment.

---

Forklift Lift Operator


[12] **MOVE FORWARD** until the forklift tines are under the CMP.

[13] **TILT** the tines back until the CMP comes to rest on the forklift mast and **LIFT** the CMP.
5. PERFORMANCE – CMP RETRIEVAL AND STAGING (continued)

[14] IF the CMP is unbalanced,
    THEN:

    [A] LOWER the CMP.

    [B] REPOSITION the fork tines under the CMP.

    [C] GO TO Step 5.[13].

[15] TRANSFER the CMP to the pre-staged plastic pallets and LOWER onto plastic pallets.

[16] MOVE the forklift away from the CMP.

### WARNING

1: Personnel are prohibited from placing any portion of their body under the suspended CMP. Failure to follow this warning could lead to serious personnel injury.

2: Some CMPs may be wrapped in plastic for radiological contamination control. Plastic wrap must remain on CMP. Failure to comply with this warning could lead to unwanted radiological contamination.

Laborers

[17] IF debris in present on exterior of CMP,
    THEN REMOVE debris using hand tools, such as shovel, hoe, broom, or brush.

Waste Operator

[18] INSPECT CMP for the following;
    • Degradation of CMP exterior (e.g., cracks, holes, sharp edges)
    • End cap integrity
    • Brass tag displaying ID number and/or number painted on corrugated metal surface
    AND DOCUMENT inspection results on Attachment 1.
5. PERFORMANCE – CMP RETRIEVAL AND STAGING (continued)

NOTE  Plastic pallets in the following steps are used to stage the CMP for plastic wrapping and radiological survey. Pallet spacing must accommodate the length of the CMP and allow for placement of forklift tines.

Waste Operator/Laborers

[19] ENSURE plastic pallets are staged on a level surface.

NOTE  Plastic should be long enough to allow for pigtails on ends of CMPs for taping.

[20] PLACE two layers of plastic on the plastic pallets with sufficient length to wrap the entire CMP.

PIC

[21] WHEN plastic pallets are ready for CMP placement, THEN ENSURE non-essential personnel are clear of the active work area.

Forklift Lift Operator

[22] TRANSFER the CMP to the pre-staged plastic pallets and LOWER onto plastic pallets.

[23] MOVE the forklift away from the CMP.

Waste Operator/Laborers


Waste Operator

[25] RECORD CMP identification number (i.e., brass tag number or painted number on CMP) on Attachment 1.

[26] APPLY one (1) All-in-One Label and Radioactive Label directly onto the CMP.

Waste Operator/Laborers

[27] (&) WRAP CMP with two (2) layers of plastic and TAPE plastic seams and ends with cargo-pit tape. (HWP 3.3)

PIC

[28] ENSURE RCT performs a radiological survey of the CMP.
5. PERFORMANCE – CMP RETRIEVAL AND STAGING (continued)

Waste Storage Operator

[29] APPLY the following labels to CMP:
   • (&) Two (2) All-In One Label (placed on plastic approximately 2 inches from the
     end caps on the side of the CMP)
   • Two (2) Radioactive Labels (below All-In-One Labels)
   • Two (2) Characterization Labels (next to All-In-One Labels)
   • Two (2) Indication of Hazard Labels

[30] OBTAIN cargo/ratchet straps and INSPECT for the following:
   • weather checked
   • rips/tears in materials
   • ratchet mechanism operable

[31] IF deficiencies were identified,
    THEN REMOVE straps from service (i.e., dispose of straps) and GO TO Step 5.[30].

[32] SECURE the CMP to the plastic pallets using one cargo/ratchet strap per pallet or as
    directed by PIC.

[33] IF transferring CMP to another DEFINED AREA,
    THEN GO TO N3B-DOP-TRU-2136, CMP Intra-Facility Transfer.

PIC

[34] IF retrieving additional CMPs,
    THEN GO TO Step 5.[3] for top tier,
    OR GO TO Step 5.[6] for lower tier.

[35] IF CMP retrieval is complete for the day,
    THEN ENSURE the following:
   • Exposed CMPs are recovered with a minimum of three inches of overburden.
   • Equipment and site is placed in a safe configuration.
   • Secondary waste containers are closed and secured.
   • TA-54 Operations Center is notified that CMP retrieval activities are completed.
6. NON-ROUTINE OPERATIONS

The following subsections provide instructions for situations that may potentially occur and have been evaluated during development of the Hazard Analysis. Subsections may be entered and performed as needed during the performance of other procedure sections. Upon completion of activities in this section, if not otherwise specified, operators return to the previous section and resume operations as directed by the PIC. Additional emergency and abnormal responses are provided N3B-BEP-TRU-3001, TA-54 East Building Emergency Plan, and associated response procedures.

6.1 Inclement Weather

This subsection is conducted when weather conditions, such as significant precipitation or sustained wind greater than 20 MPH, are present. Weather conditions are monitored by the TA-54 Operations Center.

PIC


[2] IF a significant precipitation event is imminent,
   THEN COVER exposed CMP with tarps/plastic to minimize rainwater accumulation.

[3] PLACE equipment and site in a safe configuration.

[4] NOTIFY the TA-54 Operations Center that operations are suspended.

[5] TAKE shelter as appropriate.

[6] RESUME operations when directed by the TA-54 Operations Center, to include:
   • Inspection of the pit by a Competent Person
   • Notification of precipitation event and stormwater accumulation at excavation site to
     the Stormwater Representative
   • Evaluation of additional prerequisite actions that need to be re-performed
6.2 Liquid Discovery during CMP Activities

This subsection is performed when liquids are discovered during CMP retrieval activities. Per characterization data and historical documents, CMPs are not anticipated to contain free liquids.

PIC


[2] PLACE equipment and site in a safe configuration (e.g., excavated CMPs are on level surface).

[3] NOTIFY the TA-54 Operations Center that operations are suspended due to liquid discovery and REQUEST evaluation of entry into N3B-AOP-TRU-3003, Material Release and Spill.

[4] DOCUMENT guidance provided in the Comments section of Attachment 1.

6.3 Degradation/Fragments of CMP

This subsection is performed when fragments or loose debris are discovered when lifting the CMP. Refer to Section 6.5, Degradation of CMP End Caps, when fragmentation occurs outside of the pit.

PIC

[1] ENSURE CMP is located on a level surface.

Excavator Operator

[2] COLLECT CMP fragments and soil using the excavator and PLACE into an approved container, such as a Standard Waste Box (SWB), per direction of Field Coordinator.

PIC

[3] REQUEST RCT to perform surveys on debris and excavation site.

[4] IF contamination is discovered, THEN FOLLOW direction of RCT and DOCUMENT actions taken in the Comments section in Attachment 1.

6.4 **Catastrophic Deterioration of the CMP**

This subsection is performed when the CMP displays signs of catastrophic deterioration, such as severe bowing, stress cracks, or section break off, while lifting the CMP.

**Forklift Operator**

[1] **LOWER** the CMP to the ground.

**Laborers**

[2] **COVER** the CMP with tarps or plastic.

**Excavator Operator**

[3] **COVER** the CMP with soil until it is at least three (3) inches deep.

**PIC**

[4] **PLACE** equipment and site in a safe configuration.

[5] **NOTIFY** TA-54 Operations Center that operations are suspended.

[6] **RECORD** detailed information regarding the degraded CMP on Attachment 1.

[7] **INITIATE** development of a recovery plan for degraded CMP.

6.5 **Degradation of CMP End Caps**

This subsection is performed when CMP end cap degradation (e.g., concrete is crumbling, loose, or cracked) is observed during inspection and cleaning. Refer to Section 6.3, Degradation/Fragments of CMP, when fragmentation occurs while lifting.

**Laborers**

[1] **PLACE** CMP fragments into plastic bag.

[2] **PLACE** plastic bag over degraded end cap.

6.7 **No Identification Number for CMP**

This subsection is performed when a CMP does not have any identification information, such as a brass tag or stencil/painted ID number.

**PIC**

[1] **ENSURE** CMP is located on a level surface.

[2] **INSPECT** accessible portions of CMP for identifying information and the excavation site for detached tags.

[3] **PROVIDE** Waste Processing Engineering with available information and **DOCUMENT** guidance provided on Attachment 1.

6.8 **Soil Contamination**

This subsection is performed if the CMP debris or soil attached to the CMP during inspection and cleaning are radiologically contaminated.

**NOTE**  
*Respiratory protection will be used when handling contaminated soil and/or small fragments of CMP.*

**Laborers**

[1] **FOLLOW** directions of RCT for handling and placement of contaminated soil and/or small fragments of CMP into an approved waste container.
7. POST-PERFORMANCE ACTIVITIES

Post-Performance Activities may be performed at an operationally convenient time.

7.1 Activity Closeout

Waste Storage Operators

[1] REVIEW Attachment 1 for accuracy and completeness.


PIC

[3] REVIEW the procedure, applicable attachments, and/or accompanying documentation for accuracy and completeness.

[4] IF any discrepancies are identified, THEN WORK with the originator to correct the discrepancies.

[5] IF abnormal conditions were identified during the performance of this procedure, THEN INITIATE actions to correct the deficiency/discrepancy, such as generating a Nonconformance Report (N3B-P330-6) or Issues Management record (N3B-P322-4), and DOCUMENT actions taken in the Comments Section of the applicable attachment.


7.2 Records Processing

PIC

[1] ENSURE that records generated while performing this procedure are processed and maintained in accordance with N3B-P1020-1, N3B Records Management.

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<th>Record Name</th>
<th>QA Record</th>
<th>Non-QA Record</th>
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</table>
8. REFERENCES

ABD-WFM-002, Technical Safety Requirements for Technical Area 54, Area G Hazardous Waste Permit

NFPA 701, Standard Methods of Fire Tests for Flame Propagation of Textiles and Films

N3B-NCSD-19-001, Nuclear Criticality Safety Determination for Corrugated Metal Pipe Retrieval and Storage

N3B-AOP-TRU-3003, Material Release and Spill

N3B-AP-TRU-1001, General Site Hazards and Controls

N3B-AP-TRU-1101, Pre-Job Briefings

N3B-BEP-TRU-3001, TA-54 East Building Emergency Plan

N3B-DOP-TRU-1105, Work Release Inspection Sheets

N3B-PLAN-TRU-1033, TA-54 Area G Soil Management Plan

N3B-P1020-1, N3B Records Management

N3B-AP-P300-1, Integrated Work Control Process

N3B-P101-4, Forklift and Power Industrial Trucks

N3B-P322-4, Issues Management

N3B-P330-6, Nonconformance Reporting

N3B-PLAN-TRU-2008, CMP Retrieval Storm Water Control Measures Plan

N3B-DOP-TRU-2005, Waste Container Labeling

N3B-DOP-TRU-2136, CMP Intra-Facility Transfer
### CMP RETRIEVAL CHECKLIST

#### Section 4, Prerequisite Actions

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<td>High Consequence Material Handling Activity Form (N3B-Form-2041) is available and approved.</td>
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#### Section 5, CMP Retrieval

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7.1[2] Performed By:

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