

AMWTP HWMA/RCRA PERMIT  
FOR THE  
IDAHO NATIONAL LABORATORY

**ATTACHMENT 4**

Section F  
Inspections

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**TABLE OF CONTENTS****ATTACHMENT 4****PROCEDURES TO PREVENT HAZARDS (INSPECTIONS)**

F-2	Inspection Schedule .....	1
F-2a	General Inspection Requirements .....	1
F-2a(1)	Types of Problems .....	3
F-2a(2)	Frequency of Inspections .....	4
F-2a(3)	Inspection Records and Record Keeping.....	4
F-2a(4)	Remedy Schedule.....	4
F-2b	Specific Process Inspection Requirements.....	5
F-2b(1)	Container Inspection .....	5
F-2b(8)	Miscellaneous Unit Inspection.....	7

**LIST OF TABLES**

Table F-1.	WMF-634 Inspection Program Summary.....	9
Table F-2.	Type II Module (WMF-628 – WMF-633) Inspection Program Summary.....	13
Table F-3.	Type I Module Inspection Program Summary.....	17
Table F-4.	SWEPP Inspection Program Summary.....	21
Table F-5.	WMF-636 Pad 2 Inspection Program Summary.....	25
Table F-6.	AMWTP Outside Storage Area Program Summary.....	30
Table F-7.	WMF-676 General Facility/Storage Areas Inspection Summary.....	32
Table F-8.	Box Line Inspection Program Summary.....	35
Table F-9.	SCW Glovebox System Inspection Program Summary .....	37
Table F-10.	Supercompactor Inspection Program Summary .....	39
Table F-11.	Drum Repack System Inspection Program Summary .....	41

1 **F-2 Inspection Schedule [IDAPA 58.01.05.008 and 58.01.05.012; 40 CFR 264.15**  
2 **and 270.14(b)(5)]**

3 This section describes the various inspection programs in place to ensure safe storage of  
4 waste containers at the MWMUs, proper operation of supporting equipment and monitoring  
5 equipment, and availability of emergency equipment in sufficient number and in operable  
6 condition whenever needed.

7 Inspections are conducted in the MWMUs to detect leaks, spills, or container  
8 deterioration that may lead to the release of HWMA/RCRA-regulated waste constituents to the  
9 environment or pose a threat to human health. Inspections typically performed in the MWMUs  
10 are for container integrity, fire or spill response equipment, emergency warning or  
11 communications systems, or operations support equipment. HWMA/RCRA deficiencies noted  
12 during the inspection and any corrective actions taken are documented and placed in the  
13 Operating Record. See Attachment 1.A for additional information on the Operating Record and  
14 the associated requirements. Deterioration or malfunction of containers, equipment, or structures  
15 identified during the inspection is remedied on a schedule that ensures the problem does not lead  
16 to any environmental or human health hazard. Imminent hazards or hazards that have already  
17 occurred are addressed immediately on a case-by-case basis. Corrective action is initiated and  
18 tracked to completion.

19 **F-2a General Inspection Requirements [IDAPA 58.01.05.008 and 58.01.05.012;**  
20 **40 CFR 264.15, 264.33, and 270.14(b)(5)]**

21 Inspections are performed by AMWTP personnel on a routine basis. Table F-1 lists the  
22 inspections performed in WMF-634, Table F-2 lists the inspections performed in the Type II  
23 Modules (WMF-628 - WMF-633), Table F-3 lists the inspections performed in the Type I  
24 Module, Table F-4 lists the inspections performed in SWEPP, Table F-5 lists the inspections  
25 performed in WMF-636 Pad 2, Table F-6 lists the inspections performed in the AMWTP Outside  
26 Storage Area, and Tables F-7 through F-11 list the inspections performed in WMF-676. These  
27 inspections satisfy the HWMA/RCRA-required inspections for container storage/treatment units.  
28 In addition to these inspections, preventive maintenance (PM) of buildings, equipment, and  
29 various operating systems is conducted on a regular basis and are typically tracked via the

1 AMWTP computerized maintenance management system (CMMS). Inspection records are  
2 maintained as part of the Operating Record. The inspection records are used to document  
3 HWMA/RCRA-required inspections conducted at the MWMUs.

4 AMWTP personnel routinely conduct inspections of the AMWTP area, fences, gates,  
5 warning signs, locks, and equipment; waste loading and unloading areas; and structural and  
6 operating equipment. These inspections are conducted in accordance with the frequencies noted  
7 in Tables F-1 through F-11.

8 PM inspections are developed, reviewed, approved, scheduled, and issued using the  
9 AMWTP CMMS. Typical PM inspections performed at the AMWTP include:

- 10 • Fire control system components (fire sprinklers, fire water pumps, hydrants, etc.),
- 11 • Standby power generators,
- 12 • Emergency lights (including those associated with ventilation systems, indicating  
13 possible dangerous conditions due to ventilation system low flow), and
- Container handling equipment.

14 PM inspections are performed per a set schedule. The frequency of an inspection is  
15 based upon the AMWTP Maintenance Analysis Program, vendor  
16 specifications/recommendations, or NFPA requirements. The AMWTP Maintenance Analysis  
17 Program is designed to determine the maintenance requirements for a specific piece of  
18 equipment. Typical items addressed under the Maintenance Analysis Program include the  
19 frequency of use, operational requirements, intended use, failure modes, results/consequences of  
20 a failure, environmental conditions, and safety concerns.

21 Calibration of equipment is performed in accordance with established procedures and  
22 integrated into the AMWTP CMMS. Calibrations are scheduled to occur prior to the calibration  
23 expiration date. Calibrations are conducted in accordance with specific checklists containing  
24 step-by-step instructions, as appropriate.

25 AMWTP personnel conduct regular radiation surveys of the MWMUs using appropriate  
26 instrumentation. These surveys enable the detection of changes in radiation levels related to the  
27 wastes in storage. The surveys are recorded on survey forms, which are then signed and dated  
28 (including time) by the AMWTP personnel performing the survey. Whenever a container is

1 dropped or otherwise mishandled, AMWTP personnel will conduct a radiation survey and  
2 inspect the integrity of the container.

3       Following completion of the above-described inspections, any problems requiring further  
4 action are corrected on a timely basis with full knowledge of the appropriate AMWTP  
5 management personnel. AMWTP personnel report and record all identified HWMA/RCRA  
6 deficiencies, status of corrective actions, and completions of corrective actions. When a  
7 deficiency is identified, the appropriate corrective action and the urgency of the need  
8 are evaluated.

9       Deficiencies are tracked on a weekly basis until the deficiencies have been corrected.  
10 The Operations Manager, or designee, shall review all completed HWMA/RCRA inspection  
11 forms and the status of all unresolved deficiencies on a weekly basis. The review of the  
12 completed inspection forms will be conducted to ensure that the forms are accurately filled out  
13 and that all deficiencies are adequately identified. Conditions identified during the weekly  
14 reviews that are adverse to accuracy, completeness, or timeliness of deficiency corrective actions  
15 shall be immediately given to AMWTP Management [including the Environmental, Safety,  
16 Health, and Quality (ESH&Q) Director] for resolution. The Environmental Compliance  
17 Manager, or designee, shall provide oversight on deficiency tracking and resolution to ensure  
18 that this process is properly implemented. If remedial actions cannot be completed within  
19 21 calendar days of discovery (10 days of determination for any HWMA/RCRA deficiencies  
20 associated with secondary containment systems), the Operations Manager, or designee, shall take  
21 action to notify the ESH&Q Director, or designee, for review and determination of necessary  
22 notifications and/or other actions. When the deficiency has been corrected, the corrective action  
23 taken and date completed are to be entered on the inspection form or in association with the  
24 inspection form (e.g., attached to the inspection form).

25 **F-2a(1) Types of Problems [IDAPA 58.01.05.008; 40 CFR 264.15(b)(3)]**

26       Tables F-1 through F-11 identify the types of conditions evaluated during inspections.  
27 These inspection items are outlined in operating procedures or maintenance procedures that  
28 support the inspections. All HWMA/RCRA deficiencies noted during an inspection are

1 corrected, a work request written, or the deficiency recorded in the Operating Record. The date  
2 when the condition is corrected or repairs are made is recorded in the Operating Record.

3 **F-2a(2) Frequency of Inspections [IDAPA 58.01.05.008; 40 CFR 264.15(b)(4) and**  
4 **264.174]**

5 The frequency of inspections is outlined in Tables F-1 through F-11. To ensure the safety  
6 of personnel and protection of the environment, the inspection frequencies vary according to  
7 operational need for the MWMUs and associated equipment. Inspection schedules are based on  
8 radiological and personnel safety concerns. These factors are discussed further in Section F-2b.

9 In addition to the inspections described above, various inspections may be required prior  
10 to, and at the start of, operation of various types of equipment.

11 **F-2a(3) Inspection Records and Record Keeping [IDAPA 58.01.05.008;**  
12 **40 CFR 264.15(d) and 264.73(b)(5)]**

13 Inspection records are maintained as part of the Operating Record. See Attachment 1.A  
14 for additional information on the Operating Record. The inspection records include, at a  
15 minimum, the date and time of inspection, the name of the person performing the inspection, a  
16 notation of the observations made, and the date and nature of any repairs or remedial  
17 actions taken.

18 **F-2a(4) Remedy Schedule [IDAPA 58.01.05.008; 40 CFR 264.15(c)]**

19 Deterioration or malfunction of ventilation and/or containment systems may lead to an  
20 environmental or human hazard. The presence of and oversight by AMWTP personnel during  
21 operations ensures quick detection and mitigation of equipment deterioration and malfunction  
22 that could present a hazardous situation. Where a hazard is imminent or has already occurred,  
23 remedial action is taken immediately. Equipment is taken out of service, repairs are  
24 accomplished, and readiness inspections performed prior to the equipment being placed back  
25 into service. See Attachment 7 for further information.

1 **F-2b Specific Process Inspection Requirements [IDAPA 58.01.05.008 and**  
2 **58.01.05.012; 40 CFR 264.15(b)(4), 264.174, and 270.14(b)(5)]**

3 **F-2b(1) Container Inspection [IDAPA 58.01.05.008; 40 CFR 264.15(b) and 264.174]**

4 The containers and the container storage areas in the MWMUs are inspected, at least  
5 weekly, for leaks, spills, and container deterioration. Specific information on how inspections  
6 are performed in the various MWMUs is provided below.

7 **Type II Modules**

8 AMWTP personnel conduct a weekly visual container inspection on the south side of  
9 WMF-634 by walking through each aisle looking for signs of container leaks and deterioration as  
10 well as the condition of the pallets or risers. Additional inspections are conducted on containers,  
11 which are located on the north side of WMF-634 looking for similar leaks, spills, or container  
12 deterioration. Daily inspections of loading and unloading areas are performed on those days  
13 when containers are moved to/from or transferred within the building. Daily inspections of  
14 treatment areas are also conducted when treatment activities are occurring.

15 Any HWMA/RCRA deficiencies detected during the inspections are reported to the  
16 appropriate AMWTP management personnel and documented in the Operating Record. See  
17 Table F-1 for further information on container inspections in WMF-634.

18 The inspections of containers in the Type II Modules, WMF-628 through WMF-633, are  
19 performed on both the north and south sides of the buildings, as described for the inspections on  
20 the south side of WMF-634. See Tables F-3 for further information on container inspections in  
21 WMF-628 through WMF-633.

22 **Type I Module and SWEPP**

23 Visual inspection of containers in the Type I Module and SWEPP are conducted by the  
24 inspector walking through each aisle looking for signs of container leaks and deterioration as  
25 well as the condition of the pallets or risers. See Table F-3 for further information on container  
26 inspections in the Type I Module and Table F-4 for further information on container inspections  
27 in SWEPP. Daily inspections of loading and unloading areas are performed on those days when

1 containers are moved to/from or transferred within the building. Daily inspections of treatment  
2 areas are also conducted when treatment activities are occurring. Any HWMA/RCRA  
3 deficiencies detected during the inspection are reported to the appropriate AMWTP management  
4 personnel and documented in the Operating Record.

#### 5 **WMF-636 Pad 2**

6 Visual inspection of containers in WMF-636 Pad 2 is conducted by the inspector walking  
7 through each aisle looking for signs of container leaks and deterioration as well as the condition  
8 of the pallets or risers. Daily inspections of loading and unloading areas are performed on those  
9 days when containers are moved to/from or transferred within the building. See Table F-5 for  
10 further information on container inspections in WMF-636 Pad 2. Any HWMA/RCRA  
11 deficiencies detected during the inspection are reported to the appropriate AMWTP management  
12 personnel and documented in the Operating Record.

#### 13 **AMWTP Outside Storage Area**

14 Visual inspection of containers in the AMWTP Outside Storage Area is conducted by the  
15 inspector walking through each aisle looking for signs of container leaks and deterioration as  
16 well as the condition of the pallets or risers. Daily inspections of loading and unloading areas are  
17 performed on those days when containers are moved to/from or transferred within the OSA. See  
18 Table F-6 for further information on container inspections in the AMWTP Outside Storage Area.  
19 Any HWMA/RCRA deficiencies detected during the inspection are reported to the appropriate  
20 AMWTP management personnel, and documented in the Operating Record.

#### 21 **AMWTP Treatment Facility**

22 AMWTP personnel conduct a visual inspection of containers in the storage areas of  
23 WMF-676. AMWTP personnel also conduct a visual inspection of all containers stored within  
24 treatment areas. See Attachment 1.H, Table D-3 for a list of storage and treatment areas in  
25 WMF-676. The inspector performs inspections, either visually or via the CCTV system, looking  
26 for signs of container leaks and deterioration, as well as inspecting the condition of the storage  
27 area. Containers are stored such that they are easily visible from all sides, either manually by the  
28 inspector or via the CCTV system inspection methods. Daily inspections of loading and

1 unloading areas are performed on those days when containers are moved to/from or transferred  
2 within the treatment facility. Daily inspections are also conducted when containers with poor  
3 integrity are present in the CCS/Maintenance Area (Rooms 147/147D) and the Drum Assay  
4 Conveyor Area (Room 126C). See Table F-7 for further information on container inspections in  
5 WMF-676. Any HWMA/RCRA deficiencies detected during the inspection are reported to the  
6 appropriate AMTWP management personnel and documented in the Operating Record.

7 **F-2b(8) Miscellaneous Unit Inspection [IDAPA 58.01.05.008 and 58.01.05.012;**  
8 **40 CFR 264.602, 270.14(b)(5), and 270.23(a)(2)]**

9 The miscellaneous units located in WMF-676 are inspected, at least weekly, for leaks,  
10 spills, and secondary container system integrity deterioration. Specific information on how  
11 inspections are performed in the various WMF-676 miscellaneous units is provided below.

12 **Box Lines/Hot Maintenance/Import-Export Glovebox**

13 Routine visual inspections of the box lines, hot maintenance area, and import/export  
14 glovebox may be conducted via observation windows or the CCTV system to limit the number  
15 of personnel entries into process areas. The box lines, hot maintenance area, and import/export  
16 glovebox are visually inspected weekly for leaks, spills, or signs of physical damage that  
17 threatens the integrity of the secondary containment system, when MW is present. Daily  
18 inspections are performed when uncontainerized waste is present or waste is transferred to/from  
19 the box lines, hot maintenance area, and import/export glovebox. Inspection schedules are  
20 presented in Table F-8.

21 **SCW Glovebox System**

22 Routine visual inspections of the SCW glovebox system may be conducted via  
23 observation windows or the CCTV system. The SCW glovebox system is inspected weekly for  
24 signs of leaks, spills, or signs of physical damage that threatens the integrity of the secondary  
25 containment system, when MW is present. Daily inspections are performed when  
26 uncontainerized waste is present or waste is transferred to/from the SCW glovebox system.  
27 Inspection schedules are presented in Table F-9.

1 **Supercompactor**

2 Routine visual inspections of the supercompactor may be conducted via observation  
3 windows or the CCTV system, limiting the number of personnel entries into process areas. The  
4 supercompactor and surrounding area are inspected weekly for signs of leaks, spills, or signs of  
5 physical damage that threaten the integrity of the secondary containment system, when MW is  
6 present. Daily inspections are performed when uncontainerized waste is present or waste is  
7 transferred to/from the supercompactor. Inspection schedules are presented in Table F-10.

8 **Drum Repack System**

9 Routine visual inspections of the drum repack system may be conducted via observation  
10 windows or the CCTV system, limiting the number of personnel entries into process areas. The  
11 drum repack system is inspected weekly for signs of leaks, spills, or signs of physical damage  
12 that threaten the integrity of the secondary containment system, when MW is present. Daily  
13 inspections are performed when uncontainerized waste is present or waste is transferred to/from  
14 the drum repack system. Inspection schedules are presented in Table F-11.

**Table F-1. WMF-634 Inspection Program Summary**

Item IDAPA 58.01.05.008 [40 CFR 264.15(b)(1)]	Frequency <sup>a, b</sup> IDAPA 58.01.05.008 [40 CFR 264.15(b)(4)]	Types of Problems IDAPA 58.01.05.008 [40 CFR 264.15(b)(3)]
<b>Storage Areas</b>		
Secondary Containment System Integrity	W	<p><u>Problem:</u> Cracks, gaps, or other degradation of floors, ramps, curbs, walls, and special coatings, which could compromise the integrity of the secondary containment system.</p> <p>Visually inspect the floor, including interior ramps, and curbs for evidence of significant cracks and gaps (i.e., <math>\geq 1/32</math> in.) that may compromise the integrity of the containment. Verify that there is no peeling coating, that curbs are in good condition, and that no liquid is present on the floor.</p>
Spill Pallets/Pans	W	<p><u>Problem:</u> Cracks, gaps, or other degradation of spill pallets/pans, which could compromise the integrity of the secondary containment system. Liquid in spill containment system.</p> <p>Visually inspect the spill pallets/pans, or equivalent, for evidence of significant cracks and gaps that may compromise the integrity of the containment. Ensure that no liquid is present in the spill containment system.</p>
Leaks/Spills	D/W	<p><u>Problem:</u> Spilled or leaking containers.</p> <p>Visually inspect the area for MW leaks and spills. Initiate corrective action, if needed. Inspect loading and unloading areas daily when in use. Inspect storage areas weekly.</p>
Aisle Space <sup>c</sup>	W	<p><u>Problem:</u> Insufficient aisle space.</p> <p>Ensure a minimum of 3-ft aisle space is maintained between rows of containers and between the rows and all internal and external walls unless one side of a container resides against an interior/exterior wall or structure of the building. Ensure a minimum 20-ft center access aisle is maintained in the areas where “fast” assay is not being performed. Ensure a minimum 16-ft center access aisle is maintained in the areas where “fast” assay is being performed.</p>
Container Integrity	W	<p><u>Problem:</u> Damaged or leaking containers and containers that are not closed.</p> <p>Visually inspect for any liquid present on or near the containers and for defective containers (e.g., metal containers that are visibly pitted or show signs of metal fatigue; and SSOPs and HMPPS that are ripped or torn, or show signs of stress or strain) by visually scanning around the outside of each stack, and down the aisles.</p>

**Table F-1. WMF-634 Inspection Program Summary (continued)**

<p><b>Item</b> <b>IDAPA 58.01.05.008</b> <b>[40 CFR 264.15(b)(1)]</b></p>	<p><b>Frequency<sup>a, b</sup></b> <b>IDAPA 58.01.05.008</b> <b>[40 CFR 264.15(b)(4)]</b></p>	<p><b>Types of Problems</b> <b>IDAPA 58.01.05.008</b> <b>[40 CFR 264.15(b)(3)]</b></p>
<p><b>Storage Areas (Continued)</b></p>		
<p>Container Position</p>	<p>W</p>	<p><u>Problem:</u> Containers may be improperly stored or positioned based on the storage configuration. Check that containers are positioned properly and properly located in the storage configuration.</p> <p>Dense pack configuration:</p> <ul style="list-style-type: none"> <li>• Drums are no more than 4 wide by 5 high by 22 long.</li> <li>• Boxes are no more than 4 wide by 4 high by 11 long.</li> </ul> <p>Row with one side of a container residing against an interior/exterior wall or structure of the building:</p> <ul style="list-style-type: none"> <li>• Boxes and drums are no more than 1 container wide by 1 container high by 10 containers long.</li> </ul> <p>Macroencapsulation containers:</p> <ul style="list-style-type: none"> <li>• Drums are no more than 2 wide by 2 high by 22 long.</li> <li>• Boxes are no more than 2 wide by 2 high by 11 long.</li> <li>• HMPPS are no more than 2 wide by 1 high by 'n' long.</li> </ul> <p>Containers in SSOPs:</p> <ul style="list-style-type: none"> <li>• Containers in SSOPs are no more than 4 wide by 1 high by "n" long, allowing for more aisle space.</li> </ul> <p>Repaired containers:</p> <ul style="list-style-type: none"> <li>• Drums are no more than 2 wide by 2 high by 22 long.</li> <li>• Boxes are no more than 2 wide by 2 high by 11 long.</li> </ul> <p>Bag/plastic wrap containers:</p> <ul style="list-style-type: none"> <li>• Containers with rigid waste are no more than 4 wide by 5 high by 22 long.</li> <li>• Containers with non-rigid waste are no more than 4 wide by 1 high by 22 long.</li> </ul> <p>Containers identified as pyrophoric radionuclide waste:</p> <ul style="list-style-type: none"> <li>• Drums identified as pyrophoric radionuclide waste are no more than 2 wide by 2 high by 22 long.</li> <li>• Boxes identified as pyrophoric radionuclide waste are no more than 2 wide by 2 high by 11 long.</li> </ul> <p>TDOPs and TPAs:</p> <ul style="list-style-type: none"> <li>• TDOPs and TPAs are no more than 1 wide by 1 high.</li> </ul>

**Table F-1. WMF-634 Inspection Program Summary (continued)**

Item IDAPA 58.01.05.008 [40 CFR 264.15(b)(1)]	Frequency <sup>a, b</sup> IDAPA 58.01.05.008 [40 CFR 264.15(b)(4)]	Types of Problems IDAPA 58.01.05.008 [40 CFR 264.15(b)(3)]
<b>Treatment Areas</b>		
Leaks/Spills	D	<u>Problem:</u> Spilled or leaking containers. Visually inspect for any liquids present in the treatment area, when treatment activities are occurring. Initiate corrective action if needed.
<b>Safety and Emergency Equipment</b>		
Spill Response Equipment <sup>d</sup>	M	<u>Problem:</u> Required spill response equipment/supplies missing from the spill kit. Check the tamper seal on the spill kit. If the spill kit has been opened since the last inspection, inventory the spill kit contents. Affix seal after inventory check/restocking.
Fire Extinguishers <sup>d</sup>	M <sup>e</sup>	<u>Problem:</u> Missing fire extinguisher, improper type of fire extinguisher, or inaccessible fire extinguisher. Ensure fire extinguishers are visible, are in the proper location, are the proper type, easily accessible, and that the fire extinguishers are adequately pressurized for use.
Fire Hazard Surveillance	M	<u>Problem:</u> Accumulation of flammable/combustible materials and the presence of ignition sources. Ensure all areas are free of uncontrolled accumulation of combustibles.
Fire Suppression Systems	A <sup>e</sup>	<u>Problem:</u> Fire suppression systems not operational. Ensure fire suppression systems (e.g., hydrants, fire hoses, sprinkler systems, and supporting equipment) are present and ready for operation.
Fire Detection Systems and Alarms	A <sup>e</sup>	<u>Problem:</u> Fire detection systems or alarms not operational. Ensure fire detection systems/alarms are ready for operation.
Manual Fire Alarms	A <sup>e</sup>	<u>Problem:</u> Inoperable manual fire alarm systems/equipment. Ensure manual fire alarms are ready for operation.
Emergency Communications Equipment	M	<u>Problem:</u> Emergency communications equipment not operational. Ensure that the telephone(s) are operational by checking for a dial tone.
Standby Generator	M	<u>Problem:</u> Generator is inoperable. Verify that the equipment is functioning properly. Verify fuel level.

Item IDAPA 58.01.05.008 [40 CFR 264.15(b)(1)]	Frequency <sup>a, b</sup> IDAPA 58.01.05.008 [40 CFR 264.15(b)(4)]	Types of Problems IDAPA 58.01.05.008 [40 CFR 264.15(b)(3)]
<b>Security Devices<sup>f</sup></b>		
TSA Fence Area	M	<u>Problem:</u> Fence has been damaged/breached. Check TSA fence for condition, deterioration, and identify areas requiring repair.
TSA Fence and Gate Warning Signs	M	<u>Problem:</u> Fence and gate warning signs missing, not in proper location, not visible, or not in good condition. Check TSA fence and gate warning signs for the condition of the signs. Ensure signs are visible, in good condition, and verify the location of the signs.
TSA Fence Gates and Locks	M	<u>Problem:</u> Gates not operating properly. Gates or locks missing. Check TSA fence gates and locks for condition, deterioration, and identification of items requiring repair.
Door Entrances	M	<u>Problem:</u> Entrance warning signs missing, not in the proper location, not visible, or not in good condition. Verify that required warning signs are located in the vicinity of all doors leading into the operational areas of each MWMU and that the signs are in good condition, and are visible.
<b>Monitoring Equipment</b>		
Continuous Air Monitors (CAMs)	D/W/M/A	<u>Problem:</u> CAM is inoperable, not calibrated, filter integrity compromised, or pump inoperable. Inspect daily to ensure CAMs are operable in treatment areas and waste loading/unloading areas when operating, and weekly in storage areas. Conduct monthly CAM performance check. Perform an annual CAM calibration.
<b>Operating and Structural Equipment</b>		
External Structure	A	<u>Problem:</u> Significant structure degradation. Inspect the outside of WMF-634 to evaluate the integrity of the structure.
AMWTP Drainage System <sup>f</sup>	Q	<u>Problem:</u> Accumulation of material that would affect effective operations of the AMWTP drainage system. Inspect the drainage systems including the fenced area of the drainage canal located within AMWTP area of control for materials that may cause blockage or prevent drainage.

- D = Daily (each work day); W = Weekly; M = Monthly; Q = Quarterly; A = Annually.
- Inspections are conducted only when MW is present.
- Minimum aisle spacing requirements are excluding support beams and portable equipment.
- Locations and type of equipment are identified in Table G-5 of Attachment 7.
- Inspection frequencies determined by NFPA 10, 25, and/or 72.
- The security devices and drainage system inspections identified on Table F-1 are applicable for all of the MWMUs addressed in this document. These inspection items are not reiterated on Tables F-2, F-3, F-4, F-5, F-6, and F-7.

**Table F-2. Type II Module (WMF-628 – WMF-633) Inspection Program Summary**

Item IDAPA 58.01.05.008 [40 CFR 264.15(b)(1)]	Frequency <sup>a, b</sup> IDAPA 58.01.05.008 [40 CFR 264.15(b)(4)]	Types of Problems IDAPA 58.01.05.008 [40 CFR 264.15(b)(3)]
<b>Storage Areas</b>		
Secondary Containment System Integrity	W	<p><u>Problem:</u> Cracks, gaps, or other degradation of floors, ramps, curbs, walls, and special coatings, which could compromise the integrity of the secondary containment system.</p> <p>Visually inspect the floor, including interior ramps, and curbs for evidence of significant cracks and gaps (i.e., <math>\geq 1/32</math> in.) that may compromise the integrity of the containment. Verify that there is no peeling coating, that curbs are in good condition, and that no liquid is present on the floor.</p>
Spill Pallets/Pans	W	<p><u>Problem:</u> Cracks, gaps, or other degradation of spill pallets/pans, which could compromise the integrity of the secondary containment system. Liquid in spill containment system.</p> <p>Visually inspect the spill pallets/pans, or equivalent, for evidence of significant cracks and gaps that may compromise the integrity of the containment. Ensure that no liquid is present in the spill containment system.</p>
Leaks/Spills	D/W	<p><u>Problem:</u> Spilled or leaking containers.</p> <p>Visually inspect the area for MW leaks and spills. Initiate corrective action, if needed. Inspect loading and unloading areas daily when in use. Inspect the storage areas weekly.</p>
Aisle Space <sup>c</sup>	W	<p><u>Problem:</u> Insufficient aisle space.</p> <p>Ensure a minimum of 3-ft aisle space is maintained between rows of containers and between the rows and all internal and external walls unless one side of a container resides against an interior/exterior wall or structure of the building. Ensure a minimum 20-ft center access aisle is maintained in each module in the areas where “fast” assay is not being performed. Ensure a minimum 16-ft center access aisle is maintained in the areas where “fast” assay is being performed.</p>
Container Integrity	W	<p><u>Problem:</u> Damaged or leaking containers and containers that are not closed.</p> <p>Visually inspect for any liquid present on or near the containers and for defective containers (e.g., metal containers that are visibly pitted or show signs of metal fatigue; and SSOPs and HMPPSs that are ripped or torn, or show signs of stress or strain) by visually scanning around the outside of each stack, and down the aisles.</p>

**Table F-2. Type II Module (WMF-628 – WMF-633) Inspection Program Summary (continued)**

<p><b>Item</b> <b>IDAPA 58.01.05.008</b> <b>[40 CFR 264.15(b)(1)]</b></p>	<p><b>Frequency<sup>a, b</sup></b> <b>IDAPA 58.01.05.008</b> <b>[40 CFR 264.15(b)(4)]</b></p>	<p><b>Types of Problems</b> <b>IDAPA 58.01.05.008</b> <b>[40 CFR 264.15(b)(3)]</b></p>
<p><b>Storage Areas (Continued)</b></p>		
<p>Container Position</p>	<p>W</p>	<p><u>Problem:</u> Containers may be improperly stored or positioned based on the storage configuration. Check that containers are positioned properly and properly located in the storage configuration.</p> <p>Dense pack configuration:</p> <ul style="list-style-type: none"> <li>• Drums are no more than 4 wide by 5 high by 22 long.</li> <li>• Boxes are no more than 4 wide by 4 high by 11 long.</li> </ul> <p>Row with one side of a container residing against an interior/exterior wall or structure of the building:</p> <ul style="list-style-type: none"> <li>• Boxes and drums are no more than 1 container wide by 1 container high by 10 containers long.</li> </ul> <p>Macroencapsulation containers:</p> <ul style="list-style-type: none"> <li>• Drums are no more than 2 wide by 2 high by 22 long.</li> <li>• Boxes are no more than 2 wide by 2 high by 11 long.</li> <li>• HMPPS are no more than 2 wide by 1 high by 'n' long.</li> </ul> <p>Containers in SSOPs:</p> <ul style="list-style-type: none"> <li>• Containers in SSOPs are no more than 4 wide by 1 high by "n" long, allowing for more aisle space.</li> </ul> <p>Repaired containers:</p> <ul style="list-style-type: none"> <li>• Drums are no more than 2 wide by 2 high by 22 long.</li> <li>• Boxes are no more than 2 wide by 2 high by 11 long.</li> </ul> <p>Bag/plastic wrap containers:</p> <ul style="list-style-type: none"> <li>• Containers with rigid waste are no more than 4 wide by 5 high by 22 long.</li> <li>• Containers with non-rigid waste are no more than 4 wide by 1 high by 22 long.</li> </ul> <p>Containers identified as pyrophoric radionuclide waste:</p> <ul style="list-style-type: none"> <li>• Drums identified as pyrophoric radionuclide waste are no more than 2 wide by 2 high by 22 long.</li> <li>• Boxes identified as pyrophoric radionuclide waste are no more than 2 wide by 2 high by 11 long.</li> </ul> <p>TDOPs and TPAs:</p> <ul style="list-style-type: none"> <li>• TDOPs and TPAs are no more than 1 wide by 1 high.</li> </ul>

**Table F-2. Type II Module (WMF-628 – WMF-633) Inspection Program Summary (continued)**

Item IDAPA 58.01.05.008 [40 CFR 264.15(b)(1)]	Frequency <sup>a, b</sup> IDAPA 58.01.05.008 [40 CFR 264.15(b)(4)]	Types of Problems IDAPA 58.01.05.008 [40 CFR 264.15(b)(3)]
<b>Treatment Areas</b>		
Leaks/Spills	D	<u>Problem:</u> Spilled or leaking containers. Visually inspect for any liquids present in the treatment area(s), when treatment activities are occurring. Initiate corrective action if needed.
<b>Safety and Emergency Equipment</b>		
Spill Response Equipment <sup>d</sup>	M	<u>Problem:</u> Required spill response equipment/supplies missing from the spill kit. Check the tamper seal on the spill kit. If the spill kit has been opened since the last inspection, inventory the spill kit contents. Affix seal after inventory check/restocking.
Fire Extinguishers <sup>d</sup>	M <sup>e</sup>	<u>Problem:</u> Missing fire extinguisher, improper type of fire extinguisher, or inaccessible fire extinguisher. Ensure fire extinguishers are visible, are in the proper location, are the proper type, easily accessible, and that the fire extinguishers are adequately pressurized for use.
Fire Hazard Surveillance	M	<u>Problem:</u> Accumulation of flammable/combustible materials and the presence of ignition sources. Ensure all areas are free of uncontrolled accumulation of combustibles.
Fire Suppression Systems	A <sup>e</sup>	<u>Problem:</u> Fire suppression systems not operational. Ensure fire suppression systems (e.g., hydrants, fire hoses, sprinkler systems, and supporting equipment) are present and ready for operation.
Fire Detection Systems and Alarms	A <sup>e</sup>	<u>Problem:</u> Fire detection systems or alarms not operational. Ensure fire detection systems/alarms are ready for operation.
Manual Fire Alarms	A <sup>e</sup>	<u>Problem:</u> Inoperable manual fire alarm systems/equipment. Ensure manual fire alarms are ready for operation.
Emergency Communications Equipment	M	<u>Problem:</u> Emergency communications equipment not operational. Ensure that the telephone(s) are operational by checking for a dial tone.

**Table F-2. Type II Module (WMF-628 – WMF-633) Inspection Program Summary (continued)**

Item IDAPA 58.01.05.008 [40 CFR 264.15(b)(1)]	Frequency <sup>a, b</sup> IDAPA 58.01.05.008 [40 CFR 264.15(b)(4)]	Types of Problems IDAPA 58.01.05.008 [40 CFR 264.15(b)(3)]
<b>Monitoring Equipment</b>		
CAMs	D/W/M/A	<u>Problem:</u> CAM is inoperable, not calibrated, filter integrity compromised, or pump inoperable.  Inspect daily to ensure CAMs are operable in treatment areas and waste loading/unloading areas when operating, and weekly in storage areas.  Conduct monthly CAM performance check. Perform an annual CAM calibration.
<b>Operating and Structural Equipment</b>		
External Structure	A	<u>Problem:</u> Significant structure degradation.  Inspect the outside of WMF-628 through WMF-633 to evaluate the integrity of the structures.

- a. D = Daily (each work day); W = Weekly; M = Monthly; A = Annually.
- b. Inspections are conducted only when MW is present.
- c. Minimum aisle spacing requirements are excluding support beams and portable equipment.
- d. Locations and type of equipment are identified in Table G-5 of Attachment 7.
- e. Inspection frequencies determined by NFPA 10, 25, and/or 72.

**Table F-3. Type I Module Inspection Program Summary**

Item IDAPA 58.01.05.008 [40 CFR 264.15(b)(1)]	Frequency <sup>a, b</sup> IDAPA 58.01.05.008 [40 CFR 264.15(b)(4)]	Types of Problems IDAPA 58.01.05.008 [40 CFR 264.15(b)(3)]
<b>Storage Areas</b>		
Secondary Containment System Integrity	W	<p><u>Problem:</u> Cracks, gaps, or other degradation of floors, ramps, curbs, walls, and special coatings, which could compromise the integrity of the secondary containment system.</p> <p>Visually inspect the floor, including interior ramps, and curbs for evidence of significant cracks and gaps (i.e., <math>\geq 1/32</math> in.) that may compromise the integrity of the containment. Verify that there is no peeling coating, that curbs are in good condition, and that no liquid is present on the floor.</p>
Spill Pallets/Pans	W	<p><u>Problem:</u> Cracks, gaps, or other degradation of spill pallets/pans, which could compromise the integrity of the secondary containment system. Liquid in spill containment system.</p> <p>Visually inspect the spill pallets/pans, or equivalent, for evidence of significant cracks and gaps that may compromise the integrity of the containment. Ensure that no liquid is present in the spill containment system.</p>
Leaks/Spills	D/W	<p><u>Problem:</u> Spilled or leaking containers.</p> <p>Visually inspect the area for MW leaks and spills. Initiate corrective action, if needed. Inspect loading and unloading areas daily when in use. Inspect storage areas weekly.</p>
Aisle Space <sup>c</sup>	W	<p><u>Problem:</u> Insufficient aisle space.</p> <p>Ensure a minimum of 3-ft aisle space is maintained between the rows of containers and all interior and exterior walls unless one side of a container resides against an interior/exterior wall or structure of the building. Ensure a minimum 10-ft access aisle is maintained in the PAAA/WCRA.</p>
Container Integrity	W	<p><u>Problem:</u> Damaged or leaking containers and containers that are not closed.</p> <p>Visually inspect for any liquid present on or near the containers and defective containers (e.g., metal containers that are visibly pitted or show signs of metal fatigue; and SSOPs and HMPPSs that are ripped or torn, or show signs of stress or strain) by visually scanning around the outside of each stack, and down the aisles.</p>

**Table F-3. Type I Module Inspection Program Summary (continued)**

<p><b>Item</b> <b>IDAPA 58.01.05.008</b> <b>[40 CFR 264.15(b)(1)]</b></p>	<p><b>Frequency<sup>a, b</sup></b> <b>IDAPA 58.01.05.008</b> <b>[40 CFR 264.15(b)(4)]</b></p>	<p><b>Types of Problems</b> <b>IDAPA 58.01.05.008</b> <b>[40 CFR 264.15(b)(3)]</b></p>
<p><b>Storage Areas (continued)</b></p>		
<p>Container Position</p>	<p>W</p>	<p><u>Problem:</u> Containers may be improperly stored or positioned based on the storage configuration. Check that containers are positioned properly and properly located in the storage configuration.</p> <p>Dense pack configuration:</p> <ul style="list-style-type: none"> <li>• Drums are no more than 4 wide by 5 high by 30 long.</li> <li>• Boxes are no more than 4 wide by 4 high by 15 long.</li> </ul> <p>Row with one side of a container residing against an interior/exterior wall or structure of the building:</p> <ul style="list-style-type: none"> <li>• Boxes and drums are no more than 1 container wide by 1 container high by 10 containers long.</li> </ul> <p>Macroencapsulation containers:</p> <ul style="list-style-type: none"> <li>• Drums are no more than 2 wide by 2 high by 30 long.</li> <li>• Boxes are no more than 2 wide by 2 high by 15 long.</li> <li>• HMPPS are no more than 2 wide by 1 high by 'n' long.</li> </ul> <p>Containers in SSOPs:</p> <ul style="list-style-type: none"> <li>• Containers in SSOPs are no more than 4 wide by 1 high by "n" long, allowing for more aisle space.</li> </ul> <p>Repaired containers:</p> <ul style="list-style-type: none"> <li>• Drums are no more than 2 wide by 2 high by 30 long.</li> <li>• Boxes are no more than 2 wide by 2 high by 15 long.</li> </ul> <p>Bag/plastic wrap containers:</p> <ul style="list-style-type: none"> <li>• Containers with rigid waste are no more than 4 wide by 5 high by 30 long.</li> <li>• Containers with non-rigid waste are no more than 4 wide by 1 high by 30 long.</li> </ul> <p>Containers identified as pyrophoric radionuclide waste:</p> <ul style="list-style-type: none"> <li>• Drums identified as pyrophoric radionuclide waste are no more than 2 wide by 2 high by 30 long.</li> <li>• Boxes identified as pyrophoric radionuclide waste are no more than 2 wide by 2 high by 15 long.</li> </ul> <p>TDOPs and TPAs:</p> <ul style="list-style-type: none"> <li>• TDOPs and TPAs are no more than 1 wide by 1 high.</li> </ul>

**Table F-3. Type I Module Inspection Program Summary (continued)**

Item IDAPA 58.01.05.008 [40 CFR 264.15(b)(1)]	Frequency <sup>a, b</sup> IDAPA 58.01.05.008 [40 CFR 264.15(b)(4)]	Types of Problems IDAPA 58.01.05.008 [40 CFR 264.15(b)(3)]
<b>Treatment Areas</b>		
Leaks/Spills	D	<u>Problem:</u> Spilled or leaking containers. Visually inspect for any liquids present in the treatment areas, when treatment activities are occurring. Initiate corrective action if needed.
<b>Safety and Emergency Equipment</b>		
Spill Response Equipment <sup>d</sup>	M	<u>Problem:</u> Required spill response equipment/supplies missing from the spill kit. Check the tamper seal on the spill kit. If the spill kit has been opened since the last inspection, inventory the spill kit contents. Affix seal after inventory check/restocking.
Fire Extinguishers <sup>d</sup>	M <sup>e</sup>	<u>Problem:</u> Missing fire extinguisher, improper type of fire extinguisher, or inaccessible fire extinguisher. Ensure fire extinguishers are visible, are in the proper location, are the proper type, easily accessible, and that the fire extinguishers are adequately pressurized for use.
Fire Hazard Surveillance	M	<u>Problem:</u> Accumulation of flammable/combustible materials and the presence of ignition sources. Ensure all areas are free of uncontrolled accumulation of combustibles.
Fire Suppression Systems	A <sup>e</sup>	<u>Problem:</u> Fire suppression systems not operational. Ensure fire suppression systems (e.g., hydrants, fire hoses, sprinkler systems, and supporting equipment) are present and ready for operation.
Fire Detection Systems and Alarms	A <sup>e</sup>	<u>Problem:</u> Fire detection systems or alarms not operational. Ensure fire detection systems/alarms are ready for operation.
Manual Fire Alarms	A <sup>e</sup>	<u>Problem:</u> Inoperable manual fire alarm systems/equipment. Ensure manual fire alarms are ready for operation.
Emergency Communications Equipment	M	<u>Problem:</u> Emergency communications equipment not operational. Ensure that the telephone(s) are operational by checking for a dial tone.
Standby Generator	M	<u>Problem:</u> Generator is inoperable. Verify that the equipment is functioning properly. Verify fuel level.

**Table F-3. Type I Module Inspection Program Summary (continued)**

Item IDAPA 58.01.05.008 [40 CFR 264.15(b)(1)]	Frequency <sup>a, b</sup> IDAPA 58.01.05.008 [40 CFR 264.15(b)(4)]	Types of Problems IDAPA 58.01.05.008 [40 CFR 264.15(b)(3)]
<b>Monitoring Equipment</b>		
CAMs	D/W/M/A	<u>Problem:</u> CAM is inoperable, not calibrated, filter integrity compromised, or pump inoperable. Inspect daily to ensure CAMs are operable in treatment areas and waste loading/unloading areas when operating, and weekly in storage areas. Conduct monthly CAM performance check. Perform an annual CAM calibration.
<b>Operating and Structural Equipment</b>		
External Structure	A	<u>Problem:</u> Significant structure degradation. Inspect the outside of WMF-635 to evaluate the integrity of the structure.

- a. D = Daily (each work day); W = Weekly; M = Monthly; A = Annually.
- b. Inspections are conducted only when MW is present.
- c. Minimum aisle spacing requirements are excluding support beams and portable equipment.
- d. Locations and type of equipment are identified in Table G-5 of Attachment 7.
- e. Inspection frequencies determined by NFPA 10, 25, and/or 72.

**Table F-4. SWEPP Inspection Program Summary**

Item IDAPA 58.01.05.008 [40 CFR 264.15(b)(1)]	Frequency <sup>a, b</sup> IDAPA 58.01.05.008 [40 CFR 264.15(b)(4)]	Types of Problems IDAPA 58.01.05.008 [40 CFR 264.15(b)(3)]
<b>Storage Areas</b>		
Secondary Containment System Integrity	W	<p><u>Problem:</u> Cracks, gaps, or other degradation of floors, ramps, curbs, walls, and special coatings, which could compromise the integrity of the secondary containment system.</p> <p>Visually inspect the floor; including interior ramps, and curbs for evidence of significant cracks and gaps (i.e., <math>\geq 1/32</math> in.) that may compromise the integrity of the containment. Verify that there is no peeling coating, that curbs are in good condition, and that no liquid is present on the floor.</p>
Spill Pallets/Pans	W	<p><u>Problem:</u> Cracks, gaps, or other degradation of spill pallets/pans, which could compromise the integrity of the secondary containment system. Liquid in spill containment system.</p> <p>Visually inspect the spill pallets/pans, or equivalent, for evidence of significant cracks and gaps that may compromise the integrity of the containment. Ensure that no liquid is present in the spill containment system.</p>
Leaks/Spills	D/W	<p><u>Problem:</u> Spilled or leaking containers.</p> <p>Visually inspect the area for MW leaks and spills. Initiate corrective action, if needed. Inspect loading and unloading areas daily when in use. Inspect the storage areas weekly.</p>
Aisle Space <sup>c</sup>	W	<p><u>Problem:</u> Insufficient aisle space.</p> <p>In the SSA, ensure a minimum of 3-ft aisle space is maintained between rows of containers and a 2-ft aisle space is maintained between rows of containers and internal and external walls unless one side of a container resides against an interior/exterior wall or structure of the building.</p> <p>In SWEPP Staging Areas 1 and 2 and the north and south loading/unloading areas, ensure that a 3-ft aisle space is maintained between rows of containers and internal and external walls.</p>
Container Integrity	W	<p><u>Problem:</u> Damaged or leaking containers and containers that are not closed.</p> <p>Visually inspect for any liquid present on or near the containers and for defective containers (e.g., metal containers that are visibly pitted or show signs of metal fatigue; and SSOPs and HMPPSs that are ripped or torn, or show signs of stress or strain) by visually scanning around the outside of each stack, and down the aisles.</p>

**Table F-4. SWEPP Inspection Program Summary (continued)**

<p><b>Item</b> IDAPA 58.01.05.008 [40 CFR 264.15(b)(1)]</p>	<p><b>Frequency<sup>a, b</sup></b> IDAPA 58.01.05.008 [40 CFR 264.15(b)(4)]</p>	<p><b>Types of Problems</b> IDAPA 58.01.05.008 [40 CFR 264.15(b)(3)]</p>
<p><b>Storage Areas (Continued)</b></p>		
<p>Container Position</p>	<p>W</p>	<p><u>Problem:</u> Containers may be improperly stored or positioned based on the storage configuration. Check that containers are positioned properly and properly located in the storage configuration.</p> <p>Dense pack configuration:</p> <ul style="list-style-type: none"> <li>• Containers are no more than 4 wide by 3 high by ‘n’ long, allowing for appropriate aisle space.</li> </ul> <p>Row with one side of a container residing against an interior/exterior wall or structure of the building:</p> <ul style="list-style-type: none"> <li>• Containers are no more than 1 container wide by 1 container high by 10 containers long.</li> </ul> <p>Macroencapsulation containers:</p> <ul style="list-style-type: none"> <li>• Containers are no more than 2 wide by 2 high by ‘n’ containers long, allowing for appropriate aisle space.</li> <li>• HMPPS are no more than 2 wide by 1 high by ‘n’ long allowing for appropriate aisle space.</li> </ul> <p>Containers in SSOPs:</p> <ul style="list-style-type: none"> <li>• Containers in SSOPs are no more than 4 wide by 1 high by “n” long, allowing for more aisle space.</li> </ul> <p>Repaired containers:</p> <ul style="list-style-type: none"> <li>• Containers are no more than 2 wide by 2 high by ‘n’ containers long allowing for appropriate aisle space.</li> </ul> <p>Bag/plastic wrap containers:</p> <ul style="list-style-type: none"> <li>• Containers with rigid waste are no more than 4 wide by 5 high by ‘n’ containers long, allowing for appropriate aisle space.</li> <li>• Containers with non-rigid waste are no more than 4 wide by 1 high by ‘n’ long, allowing for appropriate aisle space.</li> </ul> <p>Containers identified as pyrophoric radionuclide waste:</p> <ul style="list-style-type: none"> <li>• Drums identified as pyrophoric radionuclide waste are no more than 2 wide by 2 high by ‘n’ long, allowing for appropriate aisle space.</li> <li>• Boxes identified as pyrophoric radionuclide waste are no more than 2 wide by 2 high by ‘n’ long, allowing for appropriate aisle space.</li> </ul> <p>TDOPs and TPAs:</p> <ul style="list-style-type: none"> <li>• TDOPs and TPAs are no more than 1 wide by 1 high.</li> </ul>

**Table F-4. SWEPP Inspection Program Summary (continued)**

Item IDAPA 58.01.05.008 [40 CFR 264.15(b)(1)]	Frequency <sup>a, b</sup> IDAPA 58.01.05.008 [40 CFR 264.15(b)(4)]	Types of Problems IDAPA 58.01.05.008 [40 CFR 264.15(b)(3)]
<b>Safety and Emergency Equipment</b>		
Spill Response Equipment <sup>d</sup>	M	<u>Problem:</u> Required spill response equipment/supplies missing from the spill kit.  Check the tamper seal on the spill kit. If the spill kit has been opened since the last inspection, inventory the spill kit contents. Affix seal after inventory check/restocking.
Fire Extinguishers <sup>d</sup>	M <sup>e</sup>	<u>Problem:</u> Missing fire extinguisher, improper type of fire extinguisher, or inaccessible fire extinguisher.  Ensure fire extinguishers are visible, are in the proper location, are the proper type, easily accessible, and that the fire extinguishers are adequately pressurized for use.
Fire Hazard Surveillance	M	<u>Problem:</u> Accumulation of flammable/combustible materials and the presence of ignition sources.  Ensure all areas are free of uncontrolled accumulation of combustibles.
Fire Suppression Systems	A <sup>e</sup>	<u>Problem:</u> Fire suppression systems not operational.  Ensure fire suppression systems (e.g., hydrants, fire hoses, sprinkler systems, and supporting equipment) are present and ready for operation.
Fire Detection Systems and Alarms	A <sup>e</sup>	<u>Problem:</u> Fire detection systems or alarms not operational.  Ensure fire detection systems/alarms are ready for operation.
Manual Fire Alarms	A <sup>e</sup>	<u>Problem:</u> Inoperable manual fire alarm systems/equipment.  Ensure manual fire alarms are ready for operation.
Emergency Communications Equipment	M	<u>Problem:</u> Emergency communications equipment not operational.  Ensure that the telephone(s) are operational by checking for a dial tone.
Standby Generator	M	<u>Problem:</u> Generator is inoperable.  Verify that the equipment is functioning properly. Verify fuel level.
<b>Monitoring Equipment</b>		
CAMs	D/W/M/A	<u>Problem:</u> CAM is inoperable, not calibrated, filter integrity compromised, or pump inoperable.  Inspect daily to ensure CAMs are operable in treatment areas and waste loading/unloading areas when operating, and weekly in storage areas.  Conduct monthly CAM performance check. Perform an annual CAM calibration.

**Table F-4. SWEPP Inspection Program Summary (continued)**

Item IDAPA 58.01.05.008 [40 CFR 264.15(b)(1)]	Frequency <sup>a, b</sup> IDAPA 58.01.05.008 [40 CFR 264.15(b)(4)]	Types of Problems IDAPA 58.01.05.008 [40 CFR 264.15(b)(3)]
<b>Operating and Structural Equipment</b>		
External Structure	A	<u>Problem:</u> Significant structure degradation. Inspect the outside of WMF-610 to evaluate the integrity of the structure.

- a. D = Daily (each work day); W = Weekly; M = Monthly; A = Annually.
- b. Inspections are conducted only when MW is present.
- c. Minimum aisle spacing requirements are excluding support beams and portable equipment.
- d. Locations and type of equipment are identified in Table G-5 of Attachment 7.
- e. Inspection frequencies determined by NFPA 10, 25, and/or 72.

**Table F-5. WMF-636 Pad 2 Inspection Program Summary**

Item IDAPA 58.01.05.008 [40 CFR 264.15(b)(1)]	Frequency <sup>a, b</sup> IDAPA 58.01.05.008 [40 CFR 264.15(b)(4)]	Types of Problems IDAPA 58.01.05.008 [40 CFR 264.15(b)(3)]
<b>Storage Areas</b>		
Spill Pallets/Pans	W	<p><u>Problem:</u> Cracks, gaps, or other degradation of spill pallets/pans, which could compromise the integrity of the secondary containment system. Liquid in spill containment system.</p> <p>Visually inspect the spill pallets/pans, or equivalent, for evidence of significant cracks and gaps that may compromise the integrity of the containment. Ensure that no liquid is present in the spill containment system.</p>
Leaks/Spills	D/W	<p><u>Problem:</u> Spilled or leaking containers.</p> <p>Visually inspect the area for MW leaks and spills. Initiate corrective action, if needed. Inspect loading and unloading areas daily when in use. Inspect storage areas weekly.</p>
Aisle Space <sup>c</sup>	W	<p><u>Problem:</u> Insufficient aisle space.</p> <p>Ensure a minimum of 3-ft aisle space is maintained between rows of containers and between the rows and all internal and external walls unless one side of a container resides against an interior/exterior wall or structure of the building. Ensure a minimum 20-ft center access aisle is maintained in the areas where “fast” assay is not being performed. Ensure a minimum 16-ft center access aisle is maintained in the areas where “fast” assay is being performed.</p>
Container Integrity/Accumulated Liquids	W	<p><u>Problem:</u> Damaged or leaking containers and containers that are not closed. Accumulated liquids on top of containers.</p> <p>Visually inspect for any liquid present on or near the containers and for defective containers (e.g., metal containers that are visibly pitted or show signs of metal fatigue; and SSOPs and HMPPSs that are ripped or torn, or show signs of stress or strain) by visually scanning around the outside of each stack, and down the aisles.</p> <p>If water resulting from leaks in the roof of the WMF-636 building is found on or near a row of containers, then inspect the top of containers within the row through the use of equipment (e.g., mirrors on extension rod, portable stairs) for signs of standing water. If standing water is present, then visually inspect the top of the container for signs of damage (e.g., corrosion, metal fatigue) from the water.</p>

**Table F-5. WMF-636 Pad 2 Inspection Program Summary (continued)**

<p><b>Item</b> <b>IDAPA 58.01.05.008</b> <b>[40 CFR 264.15(b)(1)]</b></p>	<p><b>Frequency<sup>a, b</sup></b> <b>IDAPA 58.01.05.008</b> <b>[40 CFR 264.15(b)(4)]</b></p>	<p><b>Types of Problems</b> <b>IDAPA 58.01.05.008</b> <b>[40 CFR 264.15(b)(3)]</b></p>
<p><b>Storage Areas (Continued)</b></p>		
<p>Container Position</p>	<p>W</p>	<p><u>Problem:</u> Containers may be improperly stored or positioned based on the storage configuration. Check that containers are positioned properly and properly located in the storage configuration.</p> <p>Dense pack configuration:</p> <ul style="list-style-type: none"> <li>• Drums are no more than 4 wide by 5 high by 40 long.</li> <li>• Boxes are no more than 4 wide by 4 high by 20 long.</li> </ul> <p>Row with one side of a container residing against an interior/exterior wall or structure of the building:</p> <ul style="list-style-type: none"> <li>• Boxes and drums are no more than 1 container wide by 1 container high by 10 containers long.</li> </ul> <p>Macroencapsulation containers:</p> <ul style="list-style-type: none"> <li>• Drums are no more than 2 wide by 2 high by 40 long.</li> <li>• Boxes are no more than 2 wide by 2 high by 20 long.</li> <li>• HMPPS are no more than 2 wide by 1 high by ‘n’ long.</li> </ul> <p>Containers in SSOPs:</p> <ul style="list-style-type: none"> <li>• Containers in SSOPs are no more than 4 wide by 1 high by “n” long, allowing for more aisle space.</li> </ul> <p>Repaired containers:</p> <ul style="list-style-type: none"> <li>• Drums are no more than 2 wide by 2 high by 40 long.</li> <li>• Boxes are no more than 2 wide by 2 high by 20 long.</li> </ul> <p>Bag/plastic wrap containers:</p> <ul style="list-style-type: none"> <li>• Containers with rigid waste are no more than 4 wide by 5 high by 40 long.</li> <li>• Containers with non-rigid waste are no more than 4 wide by 1 high by 40 long.</li> </ul> <p>Containers identified as pyrophoric radionuclide waste:</p> <ul style="list-style-type: none"> <li>• Drums identified as pyrophoric radionuclide waste are no more than 2 wide by 2 high by 40 long.</li> <li>• Boxes identified as pyrophoric radionuclide waste are no more than 2 wide by 2 high by 20 long.</li> </ul> <p>TDOPs and TPAs:</p> <ul style="list-style-type: none"> <li>• TDOPs and TPAs are no more than 1 wide by 1 high.</li> </ul>

**Table F-5. WMF-636 Pad 2 Inspection Program Summary (continued)**

Item IDAPA 58.01.05.008 [40 CFR 264.15(b)(1)]	Frequency <sup>a, b</sup> IDAPA 58.01.05.008 [40 CFR 264.15(b)(4)]	Types of Problems IDAPA 58.01.05.008 [40 CFR 264.15(b)(3)]
<b>Safety and Emergency Equipment</b>		
Spill Response Equipment <sup>d</sup>	M	<p><u>Problem:</u> Required spill response equipment/supplies missing from the spill kit.</p> <p>Check the tamper seal on the spill kit. If the spill kit has been opened since the last inspection, inventory the spill kit contents. Affix seal after inventory check/restocking.</p>
Fire Extinguishers <sup>d</sup>	M <sup>e</sup>	<p><u>Problem:</u> Missing fire extinguisher, improper type of fire extinguisher, or inaccessible fire extinguisher.</p> <p>Ensure fire extinguishers are visible, are in the proper location, are the proper type, easily accessible, and that the fire extinguishers are adequately pressurized for use.</p>
Fire Hazard Surveillance	M	<p><u>Problem:</u> Accumulation of flammable/combustible materials and the presence of ignition sources.</p> <p>Ensure all areas are free of uncontrolled accumulation of combustibles.</p>
Fire Suppression Systems	A <sup>e</sup>	<p><u>Problem:</u> Fire suppression systems not operational.</p> <p>Ensure fire suppression systems (e.g., hydrants, fire hoses, sprinkler systems, and supporting equipment) are present and ready for operation.</p>
Fire Detection Systems and Alarms	A <sup>e</sup>	<p><u>Problem:</u> Fire detection systems or alarms not operational.</p> <p>Ensure fire detection systems/alarms are ready for operation.</p>
Manual Fire Alarms	A <sup>e</sup>	<p><u>Problem:</u> Inoperable manual fire alarm systems/equipment.</p> <p>Ensure manual fire alarms are ready for operation.</p>
Standby Generator	M	<p><u>Problem:</u> Generator is inoperable.</p> <p>Verify that the equipment is functioning properly. Verify fuel level.</p>
<b>Monitoring Equipment</b>		
CAMs	D/W/M/A	<p><u>Problem:</u> CAM is inoperable, not calibrated, filter integrity compromised, or pump inoperable.</p> <p>Inspect daily to ensure CAMS are operable in treatment areas and waste loading/unloading areas when operating, and weekly in storage areas. Conduct monthly CAM performance check. Perform an annual CAM calibration.</p>

**Table F-5. WMF-636 Pad 2 Inspection Program Summary (continued)**

Item IDAPA 58.01.05.008 [40 CFR 264.15(b)(1)]	Frequency <sup>a, b</sup> IDAPA 58.01.05.008 [40 CFR 264.15(b)(4)]	Types of Problems IDAPA 58.01.05.008 [40 CFR 264.15(b)(3)]
<b>Operating and Structural Equipment</b>		
External Structure	A	<u>Problem:</u> Significant structure degradation. Inspect the outside of the WMF-636 Pad 2 building to evaluate the integrity of the structure.

- a. D = Daily (each work day); W = Weekly; M = Monthly; A = Annually.
- b. Inspections are conducted only when MW is present.
- c. Minimum aisle spacing requirements are excluding support beams and portable equipment.
- d. Locations and type of equipment are identified in Table G-5 of Attachment 7.
- e. Inspection frequencies determined by NFPA 10, 25, and/or 72.

**Table F-6. AMWTP Outside Storage Area Program Summary**

Item IDAPA 58.01.05.008 [40 CFR 264.15(b)(1)]	Frequency <sup>a, b</sup> IDAPA 58.01.05.008 [40 CFR 264.15(b)(4)]	Types of Problems IDAPA 58.01.05.008 [40 CFR 264.15(b)(3)]
<b>Storage Areas</b>		
Waste Type Stored	W	<p><u>Problem:</u> Container with free liquids.</p> <p>Ensure that all containers stored in the area do not contain any free liquids, unless stored within a TRUPACT container. Containers within a TRUPACT container may contain up to 1% free liquid by volume.</p>
Leaks/Spills	D/W	<p><u>Problem:</u> Spilled or leaking containers.</p> <p>Visually inspect the area for MW leaks and spills. Initiate corrective action, if needed. Inspect loading and unloading areas daily when in use. Inspect storage areas weekly.</p>
Aisle Space <sup>c</sup>	D/W	<p><u>Problem:</u> Insufficient aisle space. Inadequate aisle space due to accumulation of debris and snow.</p> <p>Ensure the following aisle spacing requirements are met:</p> <ul style="list-style-type: none"> <li>• A minimum of 3-ft aisle space is maintained between rows of containers and/or trailers loaded with MW containers.</li> <li>• A minimum of 5 ft is maintained between rows of containers or loaded trailers with MW containers and the bollards surrounding the fire hydrant and fire hydrant control valve.</li> <li>• Containers and trailers loaded with MW containers are not stored within the 20-ft perimeter access road on the west and north sides of the AMWTP Outside Storage Area.</li> <li>• A minimum of 50 ft is maintained between the eastern row of containers or trailers loaded with MW containers and the western exterior wall of WMF-636 Pad 1.</li> </ul> <p>Ensure weekly that all aisle spaces are easily accessible and sufficiently cleared of accumulated materials (e.g., tumbleweeds, snow, miscellaneous debris) such that access to containers for inspections and emergencies are not impaired. Ensure daily during periods of heavy snow fall or drifting conditions that access to containers for inspections and emergencies are not impaired. Initiate corrective action, as required.</p>

**Table F-6. AMWTP Outside Storage Area Program Summary (continued)**

Item IDAPA 58.01.05.008 [40 CFR 264.15(b)(1)]	Frequency <sup>a, b</sup> IDAPA 58.01.05.008 [40 CFR 264.15(b)(4)]	Types of Problems IDAPA 58.01.05.008 [40 CFR 264.15(b)(3)]
<b>Storage Areas (Continued)</b>		
Container Integrity/ Accumulated Liquids	D/W	<p><u>Problem:</u> Damaged or leaking containers and containers that are not closed. Accumulated liquids on top of containers.</p> <p>Visually inspect for any liquid present on or near the container and defective, visibly pitted, or metal-fatigued containers by scanning around the outside of each stack, and down the aisles. Inspect weekly for signs of container degradation due to weather conditions (e.g., rain, snow) from outside storage. Inspect daily, and remove snow as necessary, during periods of heavy snow fall or drifting conditions. Initiate corrective action, as required.</p>
Container Position	W	<p><u>Problem:</u> Containers may be improperly stored or positioned based on the storage configuration.</p> <p>Check that containers are positioned properly and properly located in the storage configuration.</p> <p>Container storage configuration:</p> <ul style="list-style-type: none"> <li>• Drums are no more than 2 wide by 3 high by 38 long.</li> <li>• Boxes are no more than 2 wide by 3 high by 19 long.</li> </ul> <p>Macroencapsulation containers:</p> <ul style="list-style-type: none"> <li>• Drums are no more than 2 wide by 2 high by 38 long.</li> <li>• Boxes are no more than 2 wide by 2 high by 19 long.</li> </ul> <p>Loaded Trailer with MW Containers</p> <ul style="list-style-type: none"> <li>• No more than 6 trailers loaded with MW containers shall be present in the AMWTP Outside Storage Area at any time.</li> </ul> <p>TDOPs and TPAs:</p> <ul style="list-style-type: none"> <li>• TDOPs and TPAs are no more than 1 wide by 1 high.</li> </ul>
<b>Safety and Emergency Equipment</b>		
Fire Extinguishers <sup>d</sup>	M <sup>c</sup>	<p><u>Problem:</u> Missing fire extinguisher, improper type of fire extinguisher, or inaccessible fire extinguisher.</p> <p>Ensure fire extinguishers are visible, are in the proper location, are the proper type, easily accessible, and that the fire extinguishers are adequately pressurized for use.</p>

**Table F-6. AMWTP Outside Storage Area Program Summary (continued)**

Item IDAPA 58.01.05.008 [40 CFR 264.15(b)(1)]	Frequency <sup>a, b</sup> IDAPA 58.01.05.008 [40 CFR 264.15(b)(4)]	Types of Problems IDAPA 58.01.05.008 [40 CFR 264.15(b)(3)]
<b>Safety and Emergency Equipment (continued)</b>		
Fire Hazard Surveillance	M	<u>Problem:</u> Accumulation of flammable/combustible materials and the presence of ignition sources.  Ensure all areas within the AMWTP Outside Storage Area are free of uncontrolled accumulation of combustibles.

- a. D = Daily (each work day); W = Weekly; M = Monthly.
- b. Inspections are conducted only when MW is present.
- c. Minimum aisle spacing requirements exclude portable equipment.
- d. Locations and type of equipment are identified in Table G-5 of Attachment 7.
- e. Inspection frequencies determined by NFPA 10, 25, and/or 72.

**Table F-7. WMF-676 General Facility/Storage Areas Inspection Summary**

Item IDAPA 58.01.05.008 40 CFR 264.15(b)(1)	Frequency <sup>a, b</sup> IDAPA 58.01.05.008 40 CFR 264.15(b)(4)	Types of Problems IDAPA 58.01.05.008 40 CFR 264.15(b)(3)
<b>Storage/Treatment Areas</b>		
Secondary Containment System Integrity	W	<p><u>Problem:</u> Cracks, gaps, or other degradation of floors, ramps, curbs, walls, and special coatings, which could compromise the integrity of the secondary containment system.</p> <p>Manually, or using CCTV, visually inspect the secondary containment system for evidence of significant cracks and gaps (i.e., <math>\geq 1/32</math> in.) that may compromise the integrity of the containment. Verify that there is no peeling or excessive damage of the coating and that no liquid is present.</p>
Spill Pallets/Pans	W	<p><u>Problem:</u> Cracks, gaps, or other damage that would compromise the integrity of the secondary containment system. Liquid in spill containment system.</p> <p>Visually inspect the spill pallets/pans, or equivalent, for evidence of significant cracks and gaps that may compromise the integrity of the containment. Ensure that no liquid is present in the spill containment system.</p>
Leaks/Spills	D/W	<p><u>Problem:</u> Spilled or leaking containers.</p> <p>Manually, or using CCTV, visually inspect the area for MW leaks and spills. Initiate corrective action, if needed. Inspect loading and unloading areas daily when in use. Inspect storage areas weekly.</p>
CCS/Maintenance Area (Rooms 147/147D) and Drum Assay Conveyor Area (Room 126C) Container with Poor Integrity	D	<p><u>Problem:</u> Spilled or leaking containers.</p> <p>Manually, or using CCTV, visually inspect containers identified with poor integrity in the CCS/Maintenance Area and the Drum Assay Conveyor Area for leaks and spills. Initiate corrective action, if needed. Verify that containers identified with poor integrity do not reside in the CCS/Maintenance Area or the Drum Assay Conveyor Area for longer than seven (7) calendar days.</p>
Container Integrity	W	<p><u>Problem:</u> Damaged or leaking containers and containers that are not closed.</p> <p>Manually, or using CCTV, visually inspect for any liquid present on or near the containers and for defective containers (e.g., metal containers that are visibly pitted or show signs of metal fatigue; and SSOPs and HMPPSs that are ripped or torn, or show signs of stress or strain).</p>

**Table F-7. WMF-676 General Facility/Storage Areas Inspection Summary  
(continued)**

Item IDAPA 58.01.05.008 40 CFR 264.15(b)(1)	Frequency <sup>a, b</sup> IDAPA 58.01.05.008 40 CFR 264.15(b)(4)	Types of Problems IDAPA 58.01.05.008 40 CFR 264.15(b)(3)
<b>Storage/Treatment Areas (continued)</b>		
Container Position	W	<u>Problem:</u> Containers may be improperly stored or positioned based on the storage configuration. Manually, or using CCTV, visually verify that containers are properly located in the storage area. Verify that rows of containers are no more than two (2) containers wide, two (2) containers high, by up to 'n' in length, allowing for aisle space requirements given that no container within the row resides against a wall of WMF-676 or that rows of containers are no more than one (1) container wide, two (2) containers high, by up to 'n' in length, allowing for aisle space requirements, given that one side of a container resides against a wall of WMF-676. Containers in SSOPs or HMPPSs shall not be stored more than one (1) container high.
Aisle Space <sup>c</sup>	W	<u>Problem:</u> Insufficient aisle space. Ensure a minimum of 2-ft aisle space is maintained between rows of containers and all interior and exterior walls. If a row of containers is only one (1) container wide, then one side of the row may reside against an interior or exterior wall.
<b>Safety and Emergency Equipment</b>		
Spill Response Equipment <sup>d</sup>	M	<u>Problem:</u> Required spill response equipment/supplies missing from the spill kit. Check the tamper seal on the spill kit. If the spill kit has been opened since the last inspection, inventory the spill kit contents. Affix seal after inventory check/restocking.
Fire Extinguishers <sup>d</sup>	M <sup>c</sup>	<u>Problem:</u> Missing fire extinguisher, improper type of fire extinguisher, or inaccessible fire extinguisher. Ensure fire extinguishers are visible, are in the proper location, are the proper type, easily accessible, and that the fire extinguishers are adequately pressurized for use.
Fire Hazard Surveillance	M	<u>Problem:</u> Accumulation of flammable/combustible materials and the presence of ignition sources. Ensure all areas are free of uncontrolled accumulation of combustibles.
Fire Suppression Systems	A <sup>c</sup>	<u>Problem:</u> Fire suppression systems not operational. Ensure fire suppression systems (e.g., hydrants, fire hoses, sprinkler systems, and supporting equipment) are present and ready for operation.

**Table F-7. WMF-676 General Facility/Storage Areas Inspection Summary  
(continued)**

<b>Item</b> <b>IDAPA 58.01.05.008</b> <b>40 CFR 264.15(b)(1)</b>	<b>Frequency<sup>a, b</sup></b> <b>IDAPA 58.01.05.008</b> <b>40 CFR 264.15(b)(4)</b>	<b>Types of Problems</b> <b>IDAPA 58.01.05.008</b> <b>40 CFR 264.15(b)(3)</b>
<b>Safety and Emergency Equipment (continued)</b>		
Fire Detection Systems and Alarms	A <sup>c</sup>	<u>Problem:</u> Fire detection systems or alarms not operational.  Ensure fire detection systems/alarms are ready for operation.
Manual Fire Alarms	A <sup>c</sup>	<u>Problem:</u> Inoperable manual fire alarm systems/equipment.  Ensure manual fire alarms are ready for operation.
Emergency Communications Equipment	M	<u>Problem:</u> Emergency communication equipment not operational.  Ensure that the designated emergency telephone(s) are operational by checking for a dial tone.
Standby Generator	M	<u>Problem:</u> Generator is inoperable.  Verify that the generator is functioning properly. Verify fuel level.
<b>Operating and Structural Equipment</b>		
External Structure	A	<u>Problem:</u> Significant structure degradation.  Inspect the outside of WMF-676 to evaluate the integrity of the structure.

- D = Daily; W = Weekly; M = Monthly; A = Annually.
- Inspections are conducted only when MW is present.
- Minimum aisle spacing requirements are excluding support beams and portable equipment.
- Locations and type of equipment are identified in Table G-5 of Attachment 7.
- Inspection frequencies determined by NFPA 10, 25, and/or 72.

**Table F-8. Box Line Inspection Program Summary<sup>a</sup>**

Item IDAPA 58.01.05.008 40 CFR 264.15(b)(1)	Frequency <sup>b, c</sup> IDAPA 58.01.05.008 40 CFR 264.15(b)(4)	Types of Problems IDAPA 58.01.05.008 40 CFR 264.15(b)(3)
<b>Secondary Containment System</b>		
Secondary Containment System Integrity	W	<p><u>Problem:</u> Cracks, gaps, or other damage that would compromise the integrity of the secondary containment system.</p> <p>Manually, or using CCTV, visually inspect the secondary containment system for evidence of significant cracks and gaps (i.e., <math>\geq 1/32</math> in.) that may compromise the integrity of the containment. Verify that there is no peeling or excessive damage of the coating and that no liquid is present.</p>
Leaks/Spills	W	<p><u>Problem:</u> Spilled or leaking containers.</p> <p>Manually, or using CCTV, visually inspect the area for leaks and spills. Initiate corrective action, if needed.</p>
<b>Hot Maintenance</b>		
Leaks/Spills	D	<p><u>Problems:</u> Leaking or spilled containers.</p> <p>Manually, or using CCTV, visually inspect the area for leaks and spills when uncontainerized waste is present. Initiate corrective action, if needed.</p>
<b>Import/Export Glovebox</b>		
Leaks/Spills	D	<p><u>Problems:</u> Leaking or spilled containers.</p> <p>Manually, or using CCTV, visually inspect the area for leaks and spills when uncontainerized waste is present. Initiate corrective action, if needed.</p>
<b>Safety and Emergency Equipment</b>		
CO <sub>2</sub> Fire Suppression System	M <sup>d</sup>	<p><u>Problem:</u> Fire suppression system not operational.</p> <p>Ensure fire suppression system is ready for operation by conducting a monthly visual inspection, in accordance with the NFPA inspection criteria.</p>
CO <sub>2</sub> Fire Suppression System Cylinders	S <sup>d</sup>	<p><u>Problem:</u> CO<sub>2</sub> cylinders not full.</p> <p>Ensure CO<sub>2</sub> cylinders are full.</p>
Pyrophoric Fire Suppressant	D	<p><u>Problem:</u> Fire suppressant not present</p> <p>Ensure 30 gallons of MgO sand fire suppressant is located in each box line within reach of the manipulator arm when potential pyrophoric radionuclides are managed.</p>

**Table F-8. Box Line Inspection Program Summary<sup>a</sup> (continued)**

Item IDAPA 58.01.05.008 40 CFR 264.15(b)(1)	Frequency <sup>b, c</sup> IDAPA 58.01.05.008 40 CFR 264.15(b)(4)	Types of Problems IDAPA 58.01.05.008 40 CFR 264.15(b)(3)
CO <sub>2</sub> Fire Suppression System Hoses	5 years <sup>d</sup>	<u>Problem:</u> CO <sub>2</sub> hoses cracked or degraded that would compromise the fire suppression system.  Manually, or using CCTV, visually inspect the CO <sub>2</sub> hoses for cracks and degradation. Initiate corrective action, if needed.
<b>Equipment</b>		
Box Line Sorting Areas: <ul style="list-style-type: none"> <li>• Box line size reduction area,</li> <li>• East and west sort trough,</li> <li>• Off-line sorting trough,</li> <li>• South box line, and</li> <li>• Waste export stations.</li> </ul>	D	<u>Problem:</u> Presence of spilled liquids.  Visually inspect via CCTV and/or observation windows for spilled liquids when uncontainerized waste is present.
	W	<u>Problem:</u> Damage to structures threatening integrity of the system/equipment.  Visually inspect (via CCTV and/or observation windows) structures for signs of damage or deterioration threatening integrity.
	Between incompatible waste streams	<u>Problem:</u> Residual waste.  Inspect area for residual waste prior to accepting waste from an incompatible waste stream.
Gloveboxes/Gloveports including the venturi airlock glovebox, the tool/prohibited waste bag/bagless transfer station, and the import/export glovebox.	Q	<u>Problem:</u> Damage to seals threatening integrity.  Visually inspect glovebox seals (e.g., gloves, metal panels over gloveports) for signs of damage threatening integrity. Seals will be inspected for conditions that may impact usability or create unacceptable risk of breakthrough.
	Q	<u>Problem:</u> Damaged gloveport seals threatening integrity.  Visually inspect gloveport seals for damage threatening integrity.
	Between incompatible waste streams	<u>Problem:</u> Residual waste.  Inspect for residual waste prior to accepting waste from an incompatible waste steam.

a. Inspections identified are in addition to the general inspections listed in Table F-7.

b. D = Daily; W = Weekly; M = Monthly; Q = Quarterly; S = Semi-Annually; A = Annual.

c. Inspections are conducted only when MW is present.

d. Inspection frequencies for CO<sub>2</sub> system determined by NFPA 12.

**Table F-9. SCW Glovebox System Inspection Program Summary<sup>a</sup>**

Item IDAPA 58.01.05.008 40 CFR 264.15(b)(1)	Frequency <sup>b, c</sup> IDAPA 58.01.05.008 40 CFR 264.15(b)(4)	Types of Problems IDAPA 58.01.05.008 40 CFR 264.15(b)(3)
<b>Secondary Containment System</b>		
Secondary Containment System Integrity	W	<u>Problem:</u> Cracks, gaps, or other damage that would compromise the integrity of the secondary containment system.  Manually, or using CCTV, visually inspect the secondary containment system for evidence of significant cracks and gaps (i.e., $\geq 1/32$ in.) that may compromise the integrity of the containment. Verify that there is no peeling or excessive damage of the coating and that no liquid is present.
Leaks/Spills	W	<u>Problem:</u> Spilled or leaking containers.  Manually, or using CCTV, visually inspect the area for leaks and spills. Initiate corrective action, if needed.
<b>Equipment</b>		
SCW Gloveboxes: <ul style="list-style-type: none"> <li>• Transfer glovebox,</li> <li>• Treatment glovebox,</li> <li>• Container-in-container glovebox, and</li> <li>• Sampling glovebox.</li> </ul>	D	<u>Problem:</u> Presence of spilled liquids.  Visually inspect via CCTV and/or observation windows for spilled liquids when uncontainerized waste is present.
	W	<u>Problem:</u> Damage to structures, threatening integrity of the system/equipment.  Visually inspect (via CCTV and/or observation windows) for signs of damage or deterioration threatening integrity.
	Q	<u>Problem:</u> Damage to seals, threatening integrity.  Visually inspect glovebox seals (e.g., gloves, metal panels over gloveports) for signs of damage threatening integrity. Seals will be inspected for conditions that may impact usability or create unacceptable risk of breakthrough.
	Q	<u>Problem:</u> Damaged gloveport seals threatening integrity.  Visually inspect gloveport seals for damage, threatening integrity.

**Table F-9. SCW Glovebox System Inspection Program Summary<sup>a</sup> (continued)**

Item IDAPA 58.01.05.008 40 CFR 264.15(b)(1)	Frequency <sup>b, c</sup> IDAPA 58.01.05.008 40 CFR 264.15(b)(4)	Types of Problems IDAPA 58.01.05.008 40 CFR 264.15(b)(3)
<b>Equipment (continued)</b>		
SCW Gloveboxes (continued):	Between incompatible waste streams	<u>Problem:</u> Residual waste. Inspect for residual waste prior to accepting waste from an incompatible waste stream.

- a. Inspections identified are in addition to the general inspections listed in Table F-7.
- b. D = Daily; W = Weekly; Q = Quarterly.
- c. Inspections are conducted only when MW is present.

**Table F-10. Supercompactor Inspection Program Summary<sup>a</sup>**

Item IDAPA 58.01.05.008 40 CFR 264.15(b)(1)	Frequency <sup>b, c</sup> IDAPA 58.01.05.008 40 CFR 264.15(b)(4)	Types of Problems IDAPA 58.01.05.008 40 CFR 264.15(b)(3)
<b>Secondary Containment System</b>		
Secondary Containment System Integrity	W	<p><u>Problem:</u> Cracks, gaps, or other damage that would compromise the integrity of the secondary containment system.</p> <p>Manually, or using CCTV, visually inspect the secondary containment system for evidence of significant cracks and gaps (i.e., <math>\geq 1/32</math> in.) that may compromise the integrity of the containment. Verify that there is no peeling or excessive damage of the coating and that no liquid is present.</p>
Leaks/Spills	W	<p><u>Problem:</u> Spilled or leaking containers.</p> <p>Manually, or using CCTV, visually inspect the area for leaks and spills. Initiate corrective action, if needed.</p>
<b>Equipment</b>		
Supercompactor Gloveboxes: <ul style="list-style-type: none"> <li>• Infeed glovebox,</li> <li>• Supercompactor glovebox,</li> <li>• Post-compaction glovebox, and</li> <li>• Puck recovery glovebox.</li> </ul>	D	<p><u>Problem:</u> Presence of spilled liquids.</p> <p>Visually inspect via CCTV and/or observation windows the exterior surfaces of the gloveboxes and the area underneath the gloveboxes for spilled liquids when uncontainerized waste is present.</p>
	W	<p><u>Problem:</u> Damage to structures, threatening integrity of the system/equipment.</p> <p>Visually inspect (via CCTV and/or observation windows) structures for signs of damage or deterioration, threatening integrity.</p>
	Q	<p><u>Problem:</u> Damage to seals, threatening integrity.</p> <p>Visually inspect glovebox seals (e.g., gloves, metal panels over gloveports) for signs of damage threatening integrity. Seals will be inspected for conditions that may impact usability or create unacceptable risk of breakthrough.</p>

**Table F-10. Supercompactor Inspection Program Summary<sup>a</sup> (continued)**

Item IDAPA 58.01.05.008 40 CFR 264.15(b)(1)	Frequency <sup>b, c</sup> IDAPA 58.01.05.008 40 CFR 264.15(b)(4)	Types of Problems IDAPA 58.01.05.008 40 CFR 264.15(b)(3)
<b>Equipment (continued)</b>		
Supercompactor Gloveboxes (continued):	Q	<u>Problem:</u> Damaged gloveport seals, threatening integrity. Visually inspect gloveport seals for damage, threatening integrity.
	Between incompatible waste streams	<u>Problem:</u> Residual waste. Inspect for residual waste prior to accepting waste from an incompatible waste stream.
Sumps/Pumps	Between incompatible waste streams	<u>Problem:</u> Sump contains free liquids and/or free liquid is present in the pump lines. Visually inspect the sump area via observation windows or CCTV for any free liquid and verify that all lines are free from any liquid accumulation.
	M	<u>Problem:</u> Liquid level probe failure. Perform maintenance checks on liquid level probes.

a. Inspections identified are in addition to the general inspections listed in Table F-7.

b. D = Daily; W = Weekly; M = Monthly; Q = Quarterly.

c. Inspections are conducted only when MW is present.

**Table F-11. Drum Repack System Inspection Program Summary<sup>a</sup>**

Item IDAPA 58.01.05.008 40 CFR 264.15(b)(1)	Frequency <sup>b, c</sup> IDAPA 58.01.05.008 40 CFR 264.15(b)(4)	Types of Problems IDAPA 58.01.05.008 40 CFR 264.15(b)(3)
<b>Secondary Containment System</b>		
Secondary Containment System Integrity	W	<p><u>Problem:</u> Cracks, gaps, or other damage that would compromise the integrity of the secondary containment system.</p> <p>Manually, or using CCTV, visually inspect the secondary containment system for evidence of significant cracks and gaps (i.e., <math>\geq 1/32</math> in.) that may compromise the integrity of the containment. Verify that there is no peeling or excessive damage of the coating and that no liquid is present.</p>
Leaks/Spills	W	<p><u>Problem:</u> Spilled or leaking containers.</p> <p>Manually, or using CCTV, visually inspect the area for leaks and spills. Initiate corrective action, if needed.</p>
<b>Equipment</b>		
DWHE	D	<p><u>Problem:</u> Presence of spilled liquids.</p> <p>Visually inspect via CCTV and/or observation windows for spilled liquids when uncontainerized waste is present.</p>
	W	<p><u>Problem:</u> Damage to structures threatening integrity of the system/equipment.</p> <p>Visually inspect (via CCTV and/or observation windows) structures for signs of damage or deterioration threatening integrity.</p>
	Between incompatible waste streams	<p><u>Problem:</u> Residual waste.</p> <p>Inspect for residual waste prior to accepting waste from an incompatible waste stream.</p>

**Table F-11. Drum Repack System Inspection Program Summary<sup>a</sup> (continued)**

Item IDAPA 58.01.05.008 40 CFR 264.15(b)(1)	Frequency <sup>b, c</sup> IDAPA 58.01.05.008 40 CFR 264.15(b)(4)	Types of Problems IDAPA 58.01.05.008 40 CFR 264.15(b)(3)
DWPG	D	<u>Problem:</u> Presence of spilled liquids. Visually inspect via CCTV and/or observation windows for spilled liquids when uncontainerized waste is present.
	W	<u>Problem:</u> Damage to structures, threatening integrity of the system/equipment. Visually inspect (via CCTV and/or observation windows) structures for signs of damage or deterioration, threatening integrity.
	Q	<u>Problem:</u> Damage to seals threatening integrity. Visually inspect glovebox seals (e.g., gloves, metal panels over gloveports) for signs of damage threatening integrity. Seals will be inspected for conditions that may impact usability or create unacceptable risk of breakthrough.
	Q	<u>Problem:</u> Damaged gloveport seals threatening integrity. Visually inspect gloveport seals for damage threatening integrity.
	Between incompatible waste streams	<u>Problem:</u> Residual waste. Inspect for residual waste prior to accepting waste from an incompatible waste stream.

a. Inspections identified are in addition to the general inspections listed in Table F-7.

b. D = Daily; W = Weekly; Q = Quarterly.

c. Inspections are conducted only when MW is present.