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TRI-PARTY AGREEMENT

Change Notice Number TPA-CN- 0727	TPA CHANGE NOTICE FORM	Date: July 21, 2016
Document Number, Title, and Revision: DOE/RL-2014-13-ADD1, Revision 1; Remedial Design Report/Remedial Action Work Plan for 300-FF-2 Soils		Date Document Last Issued: May 2016
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Description of Change:

Updated and provided a better description of the methods to be used for remediating the vertical pipe units (VPUs) including the steel-pipe VPUs at the 618-10 Burial Ground.

M. S. French and B. W. Simes agree that the proposed change
DOE **Lead Regulatory Agency**
 modifies an approved workplan/document and will be processed in accordance with the Tri-Party Agreement Action Plan, Section 9.0, *Documentation and Records*, and not Chapter 12.0, *Changes to the Agreement*.

The second paragraph of Section 4.3.2.3 Vertical Pipe Unit Remedial Action Operations at the top of page 4-7 is deleted (as shown in the strike out below) and replaced with the paragraph shown in italics below:

~~An in situ treatment process will be used during VPU remediation due to the presence of highly dispersible alpha radiological materials and potential reactive materials. Treatment processes may involve placing a structure around exposed VPUs and then stabilizing contents under a Portland cement grout. Other methods may include installation of an over-casing around VPUs and then augering contents followed by Portland cement stabilization. After stabilization, waste will be removed by conventional excavation methods, as a monolith, or by a remote retrieval system and packaged for disposal or storage, as appropriate.~~

The VPUs at the 618-10 Burial Ground have been determined to be low level waste (LLW). The drum and corrugated-pipe VPUs have each been surrounded by an over-casing and have been augered to size reduce the VPU and mix it with surrounding soil. This soil/waste material is being retrieved and stabilized with Portland cement grout prior to disposal at the ERDF. Segments of the steel-pipe VPUs will be systematically exposed, covered with grout, and size reduced under the grout cover. This material will be transferred to containers and disposed at the ERDF.

Note: Include affected page number(s)

Justification and Impacts of Change:

Section 4.3.2.3 of the RDR/RAWP, as currently written, specifies the use of "an in situ treatment process" that turns each over-casing into a 30-ton monolith. Removing these monoliths would require complicated rigging operations and introduce industrial safety hazards. Also, once out of the ground, dose from the over-casings would likely create ALARA challenges and could generate elevated background radiation that would render nearby radiological count rate instrumentation inoperable. This would complicate the ability to down post areas, survey personnel, and survey equipment exiting radiologically posted areas. To maximize ALARA, this methodology was abandoned in favor of using a clamshell that allows LLW to be retrieved and dose managed in a controlled manner. The end result of the change is a more controlled VPU LLW retrieval.



