



Department of Energy
Richland Operations Office
P.O. Box 550
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14-AMRP-0096

FEB 06 2014

Ms. J. A. Hedges, Program Manager
Nuclear Waste Program
State of Washington
Department of Ecology
3100 Port of Benton
Richland, Washington 99354

Dear Ms. Hedges:

MANAGEMENT OF 618-10 BURIAL GROUND WASTE AT THE CENTRAL WASTE COMPLEX AND THE WASTE RECEIVING AND PROCESSING FACILITY (CWC/WRAP)

This letter responds to the State of Washington Department of Ecology letter (13-NWP-094, dated August 28, 2013) regarding plans to transfer Transuranic Mixed (TRUM) Waste drums from the 618-10 Burial Ground to CWC/WRAP. Current plans are delineated as follows:

- The waste was buried in the 618-10 Burial Ground in 55-gallon drums. After retrieval, the drums will be overpacked into 85- or 110-gallon drums, as appropriate, at the 618-10 Burial Ground. The 110-gallon drums are being used due to the concerns regarding beryllium hazards.
- There is limited process knowledge on these containers; however, it is known they consist of concrete and lead-lined drums that are expected to weigh approximately 900-1200 pounds. Some may be heavier.
- After retrieval and overpacking, the drums will be assayed using non-destructive analysis at the 618-10 Burial Ground to determine if they are TRUM waste or not. Based on available inventory records about fifty drums will be TRUM waste; however, the final number has not been determined.
- Upon receipt at CWC-WRAP, the TRUM drums will be managed as waste potentially containing liquids per WAC 173-303-630(7) until non-destructive examination (NDE) can be performed that will determine if there are any prohibited items (e.g., free liquids, items that would not meet Waste Isolation Pilot Plant Waste (WIPP) Acceptance Criteria).
- After the NDE is performed, the drums will then be stored in accordance with WAC 173-303-630.
- The drums will be stored in the 2404-WC Building waiting any processing.
- If no prohibited items are found, the waste will be stored at CWC-WRAP pending future WIPP certification and shipment.

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- If prohibited items are found as a result of NDE, the waste will be transported to Perma-Fix Northwest for repackaging to meet WIPP Waste Acceptance Criteria. The repackaged waste will be returned to CWC-WRAP pending future WIPP shipments.
- Secondary waste returned from Perma-Fix Northwest will be disposed of at an approved disposal unit.

Shipment of 618-10 Burial Ground drums to CWC-WRAP is expected to occur in March 2014 through September 2014. A three-day advance notice of the shipments will be made so that the State of Washington Department of Ecology may witness the field activities.

If you have any questions, please contact me, or your staff may contact Al Farabee of my staff on (509) 376-8089.

Sincerely,



Ray J. Corey, Assistant Manager
for the River and Plateau

AMRP:MSC

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