

Change Number M-89-94-01	Federal Facility Agreement and Consent Order Change Control Form Do not use blue ink. Type or print using black ink.	Date 3/13/95												
Originator TPA Negotiation Team Members		Phone (509) 372-1772												
Class of Change <input checked="" type="checkbox"/> I - Signatories <input type="checkbox"/> II - Project Manager <input type="checkbox"/> III - Unit Manager														
Change Title Complete closure of non-permitted Mixed Waste (MW) units in the 324 Building Radiochemical Engineering Cell (REC) and High Level Vault (HLV).														
Description/Justification of Change <p>This change package: (1) will result in the establishment of a schedule for closure of non-permitted MW units located in the 324 Building, 300 Area, Hanford site, and (2) represents a proposed compliance action necessary to correct noncompliance with chapter 173-303 WAC and 40 CFR Part 265 as cited in an Ecology voluntary compliance letter transmitted to USDOE and PNL on February 16, 1995. The approach leading to closure includes: 1) achieving compliance with interim status requirements; 2) stabilization of dispersible materials in the REC B-cell; 3) removal of liquid MW in the HLV tanks; and 4) Submittal of a closure plan under milestone M-20-55 and closure of non-permitted MW units in the 324 Building (REC B-cell, REC D-cell, and High Level Vault).</p> (See Attachment for continuation of Description and proposed milestones)														
Impact of Change <p>This change request establishes a new major milestone, M-89-00, to complete the closure of non-permitted MW units in the 324 Building (REC B cell, D-cell, and HLV). Interim milestones necessary to achieve compliance with interim status standards, stabilization and removal of MW, and closure of non-permitted MW storage units are proposed.</p> These milestones impact Tri-Party Agreement milestone M-20														
Affected Documents Hanford Federal Facility Agreement and Consent Order, Appendix D														
Approvals This change form approved by Amendment Five to the Hanford Federal Facility Agreement and Consent Order executed by the signatories on July 28, 1995. <table border="0" style="width: 100%;"> <tr> <td style="width: 30%; border-bottom: 1px solid black;">DOE J. D. Wagoner</td> <td style="width: 15%; border-bottom: 1px solid black;">Date</td> <td style="width: 15%; text-align: center;">___ Approved ___</td> <td style="width: 15%; text-align: center;">Disapproved</td> </tr> <tr> <td style="border-bottom: 1px solid black;">EPA C. Clarke</td> <td style="border-bottom: 1px solid black;">Date</td> <td style="text-align: center;">___ Approved ___</td> <td style="text-align: center;">Disapproved</td> </tr> <tr> <td style="border-bottom: 1px solid black;">Ecology M. Riveland</td> <td style="border-bottom: 1px solid black;">Date</td> <td style="text-align: center;">___ Approved ___</td> <td style="text-align: center;">Disapproved</td> </tr> </table>			DOE J. D. Wagoner	Date	___ Approved ___	Disapproved	EPA C. Clarke	Date	___ Approved ___	Disapproved	Ecology M. Riveland	Date	___ Approved ___	Disapproved
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EPA C. Clarke	Date	___ Approved ___	Disapproved											
Ecology M. Riveland	Date	___ Approved ___	Disapproved											

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Description/Justification of Change (Continued)

The REC complex of the 324 Building is designed to handle high activity radioactive wastes and materials in a research setting, with remote handling capabilities, and with appropriate shielding and unique space considerations.

A 324 hot cell restoration project (the B-Cell Cleanout Project (BCCP)) has been initiated in an effort to clean out and stabilize high activity, dispersible MW that have accumulated in the REC B-cell. Work under The BCCP will also result in the removal of MW, inactive research equipment, and other materials housed in the B-cell. Containerized MW are currently being stored in the REC (primarily in B-cell). One container of oil and absorbent from a 1994 B-cell shielded viewing window leak is stored in the D-cell. Containerized storage of high activity MW in the B-cell will continue until a technically sound pathway for storage elsewhere, and/or treatment and disposal is developed. Containerized MW storage in the REC may include waste transferred from the HLV tanks as a result of implementation of the preferred option identified via milestone M-89-01A. The (M-89-01A) report will identify the preferred option, provide planning/execution details and allow implementation of actions necessary to ensure safe handling and removal of liquid MW in the HLV tanks. Treatment and storage of HLV tank wastes in the REC will require development of an acceptable technical process and compliance with regulatory requirements.

High activity liquid MW is being stored in the 324 Building HLV tanks (e.g., TK-104, -105, -107). These wastes were originally utilized as radioactive feed materials for research and development projects conducted in the REC.

Initial assessment by USDOE of the waste management options for these materials has determined that they present difficult management challenges in that (at present) no definitive workplan for transportation, treatment and disposal, and/or long term permitted storage exists. Because of the location of the 324 building with respect to the Columbia River and the Tri-cities, the high activity of the wastes, and the dispersibility of the waste in the B-cell, these wastes pose a significant environmental, worker safety, and public health risk. These milestones have been proposed to minimize these risks in the near term, to achieve compliant management of the wastes, and to ensure long term protection of human health and the environment.

The following Milestones set the Schedule for key actions necessary to achieve compliance and complete closure of non-permitted mixed waste units in the 324 Building Radiochemical Engineering Cell (B-cell and D-cell), and High Level Vault:

M-89-00	Complete Closure of Non-Permitted Mixed Waste Units in the 324 Building REC B-cell, REC D-cell, and High Level Vault.	TBE*
	*A date will be established for this Major Milestone immediately following Ecology approval of the REC/HLV closure plan (see M-20-55).	
M-89-01	Complete removal of 324 Building HLV tank MW (e.g., TK-104, TK-105, TK-107) with the exception of residues which may remain following flushing and draining to the extent possible.	10/31/96
M-89-01A	USDOE will submit to Ecology a report identifying the preferred option for management of liquid MW in the HLV tanks.	3/31/95

Description/Justification of Change (Continued)

- M-89-02 Complete removal of 324 Building REC B-cell MW and equipment. 5/31/99
- Actions under this milestone include containment and removal of all B cell dispersible materials, excess equipment and debris. Containerized MW will be managed in compliance with chapter 173.303 WAC, thereby reducing risks to human health and the environment. Any remaining residues following removal actions will be managed through the final closure process. USDOEs' 324 building REC B cell clean-out project (BCCP) will be used as a guide for containerizing dispersible MW and removing unnecessary equipment and materials from B-cell.
- M-89-03 Achieve compliance with interim status facility standards at non-permitted 324 building MW units. 3/31/95
- Because of high radiation fields associated with MW stored in the REC and HLV tanks, alternative compliance measures for some interim status requirements are expected. In these instances USDOE will propose alternative measures for Ecology approval no later than March 31, 1995.
- M-89-04 Submit to Ecology a report identifying MW management alternatives and USDOE's proposal for achieving clean closure of the 324 Building REC B-cell, D-cell and HLV. This report will aid development of the 324 Closure Plan required by milestone M-20-55. 6/30/95
- The proposal will outline a feasible and cost effective program to achieve clean closure of the non-permitted storage units and compliant management of the MW currently stored in them.
- M-20-55 Submit closure plan for Non-Permitted Mixed Waste Units located in the 324 Building REC B-cell, REC D-cell and HLV. 12/31/95

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IT IS SO AGREED:

Each undersigned representative of a Party certifies that he or she is fully authorized to enter into this Agreement and Action Plan and to legally bind such Party to this Agreement and Action Plan. These change requests and amendments shall be effective upon the date on which this fifth amendment agreement is signed by the Parties. Except as amended herein, the existing provisions of the Agreement shall remain in full force and effect.

FOR THE UNITED STATES ENVIRONMENTAL PROTECTION AGENCY:

Charles Felling 7/26/95
 for Chuck Clarke Date
 Regional Administrator
 Region 10
 U.S. Environmental Protection Agency

FOR THE UNITED STATES DEPARTMENT OF ENERGY:

John Wagoner 7/25/95
 for John Wagoner Date
 Manager
 U.S. Department of Energy
 Richland Operations Office

FOR THE WASHINGTON STATE DEPARTMENT OF ECOLOGY:

Mary Riveland 7/27/95
 for Mary Riveland Date
 Director
 State of Washington
 Department of Ecology