

Meeting Minutes  
Interim Status Dangerous Waste Tank Systems  
Hanford Federal Facility Agreement and Consent Order  
Milestone M-32-00

UNIT MANAGERS MEETING  
2440 Stevens Center  
Richland, Washington

December 12, 1994  
8:00 a.m. to 10:00 a.m.

The undersigned indicate by their signatures that these meeting minutes reflect the actual occurrences of the above dated Unit Managers Meeting (UMM).

E. M. Greager  
E. M. Greager, Contractor Representative, WHC

Date: 1/27/95

P. S. Kube  
P. S. Kube, Unit Manager, RL

Date: 1/31/95

Not Present

K. J. Oates, Unit Manager, EPA Region 10

Date: \_\_\_\_\_

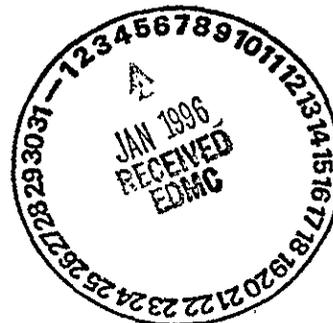
R. W. Wilson  
R. W. Wilson, Unit Manager, Washington State Department of Ecology

Date: 1/31/95

Purpose: Discuss current status and issues related to Milestone M-32-00.

Meeting minutes are attached. The minutes are comprised of the following:

- Attachment 1 - Agenda
- Attachment 2 - Summary of Discussion, Agreements and Actions
- Attachment 3 - Attendance List
- Attachment 4 - Reference Document List
- Attachment 5 - Milestone M-32-00



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Agenda

I. ACCOMPLISHMENTS

- a. PFP - M-32-01-T03, Completed construction of piping upgrades between 234-Z, 236-Z and 241-Z Tank System (Project C-031H).
- b. B Plant - M-32-07-T02, Submitted integrity assessment plan for tanks 25-1, 25-2, 24-1 and identified ancillary equipment.

II. SIGNIFICANT PLANNED ACTIVITIES

- a. T Plant - Provide response to October 18, 1994 Ecology inspection.
- b. DST - Conduct meeting with Ecology to establish new interim milestone.
- c. B Plant - Submit proposed target actions.

III. UM ISSUES

- a. PFP - Ecology's approval of compliance strategy/future interim milestone.
- b. 219-S - Budget cut impacts to Project W-087.  
Annual leak test.  
Integrity assessment schedules.
- c. B Plant - Proposed organic tanks target actions.

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Summary of Discussion, Agreements and Actions

I. ACCOMPLISHMENTS

An update on M-32-00 significant accomplishments during the last month was provided:

- PFP - Project C-031H has been completed. Project C-031H is upgrading piping between the 236-Z, 234-5Z and 241-Z buildings (M-32-01-T03).
- B Plant - The integrity assessment plan has been submitted to Ecology (M-32-07-T02).

II. SIGNIFICANT PLANNED ACTIVITIES

Significant planned activities for M-32-00 were outlined as:

- T Plant - T Plant is drafting a response to Mr. R. W. Wilson's (Ecology) November 7, 1994 letter, which included a discussion on a repair of the 2706-T sump. ICF KEH is preparing an estimate for this repair.
- Double-Shell Tanks (DST) - TWRS will continue to meeting with Ecology in separate meetings to address specific M-32-00/TWRS' issues and establish a new interim milestone. To date, two such meetings have been held; the first on November 10, 1994 and the second on December 8, 1994.
- B Plant - B Plant is drafting the transmittal letters for their proposed organic waste tank change control package. (The proposed target actions are discussed below.)

III. UM ISSUES

- PFP - Ecology was asked for their approval of the PFP compliance strategy (M-32-01-T02).
- 219-S - Mr. J. J. Beyer (WHC Projects) provided a description of budget cut impacts to Project W-178 (M-32-02-T01/tank upgrades) and Project W-087 (M-32-02-T02/line replacement). Budget impacts to Project W-178 appear to be minor if no further cuts are experienced. At current budget levels, Project W-087 would undergo an approximate 9 month schedule slippage as well as some loss in scope.

Budget cut figures are as follows:

Originally, \$8.9 million was requested.  
Budget was reduced to \$3.3 million.  
\$600 thousand is being held until mid-to-late FY 95.  
Leaving \$2.64 million available Jan. 95.

Phase I of Project W-087, replacement of transfer lines from 219-S to 244-S, would most likely be completed. Completion is currently expected by calendar year 1995. Phase II, replacement of transfer lines within 222-S and between 222-S and 219-S, might be partially completed. The initial evaluation on this is that the transfers lines between 222-S and 219-S would be installed but not tied-in at either 219-S or 222-S, nor would work within 222-S be performed.

Mr. J. L. Waite mentioned that we would need to reevaluate Phase II of Project W-087. Mr. Beyer agreed to investigate alternative to the work required within 222-S to see if 222-s' situation was similar to that of the 242-A Evaporator (in which Ecology made a determination that some modifications were not necessary at this time).

Another issue that was discussed was Project W-087's leak detection (continuous/24-hour detection). It was decided that a separate meeting would be scheduled to look into Project W-087's leak detection intervals.

Mr. Waite pointed out that we had until 110 days before the M-32-02-T02 interim milestone due date (Sept. 97) to make modifications to M32's schedule.

219-S' second topic dealt with this annual integrity test. Mr. M. J. Hall explained the situation which led up to TK-103 not being leak tested this year (TK-101 and TK-102 have been tested as scheduled). Basically, the activity of the waste within Tk-103 is too high to allow regular shipments (tanker truck shipments must meet DOT requirements for shipping). As shipments were not made at their usual quantities, remaining tank capacity needs to be used carefully. Leak testing, which is performed at 95% of the tank capacity, would introduce more liquid into the tank that would in turn increase the amount of high activity waste in the tank. The test water would then be at activity levels requiring restricted shipment quantities thereby multiplying the shipping problems at Tk-103. Once the transfer line to 244-S (Project W-087, Phase I) is completed, scheduled for Jan. 95, tanker truck shipments will not be required. 219-S expects to have a new SARP in place by mid-year 1995 under which the high activity waste can be shipped from TK-103. A new leak test will be performed at that time.

In 219-s' final topic, Mr. Hall requested a change in the 219-S tank system written integrity assessment frequency schedule. In the original assessment, 219-S stated that another assessment would be performed in three years. The three year interval was used due to the temporary use of wooden seismic supports. The tanks were later scheduled for upgrades (M-32-02-T01/completion date of Jan. 96). As an integrity assessment is required at the completion of the upgrade project, Mr. Hall proposed that the "three-year" assessment be postponed until then.

Action: Mr. Hall and Ms. Sherwood will schedule a separate meeting with Ecology to discuss Project W-087 leak detection.

Agreement: Mr. Wilson (Ecology) agreed with 219-S' plans to perform TK-103's leak test once the new SARP, expected mid-year 1995, is in place.

Agreement: Mr. Wilson (Ecology) agreed with 219-S' schedule change for future IAR (perform next IAR upon completion of upgrade projects W-178 and W-087).

- B Plant - Mr. S. E. Killoy provided a draft copy of the proposed organic waste tank target actions to Ecology. During his review of the target actions, Mr. Killoy pointed out that proposed target action M-32-07-T04 would provide a non-pressurized "hold" or "static" leak test as the integrity test. This type of test, valid for liquid levels at or below the test levels used, would be acceptable as no further additions to the organic waste tanks would occur after the test.

During discussion on the second proposed target action, M-32-07-T05, Mr. Killoy explained that performing a chemical separation (caustic strike) of radionuclides from the waste was required to get characterization data to support an engineering study on the disposition of the organic waste. He pointed out that Treatment-by-Generator provisions did not apply as the organic waste tanks are permitted as a Treatment, Storage, and Disposal unit.

Mr. Killoy mentioned that he was preparing a letter to accompany the proposed target actions that would request Ecology's approval, by January 1995, to initiate the caustic strike prior to the proposed target actions approval.

Action: Mr. Killoy is to prepare a proposed target action transmittal letters in which he will request Ecology's approval, by January 1995, to initiate the caustic strike.

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Attendance List

NAME	ORGANIZATION	PHONE #	MSIN
J. J. Beyer	WHC	372-2332	R3-35
E. M. Greager	WHC	376-3132	H6-20
M. J. Hall	WHC	373-5719	T6-07
S. E. Killoy	WHC	372-0183	S6-70
P. S. Kube	RL	373-9850	A5-15
M. D. Rollison	WHC	372-2898	T6-12
A. R. Sherwood	WHC	376-6391	H6-20
J. L. Waite	WHC	372-1772	B2-35
D. W. Wilson	WHC	372-2862	S6-70
R. W. Wilson	Ecology	736-3031	B5-18

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Reference Document List

(Documents listed were provided to Ecology during UMM)

1. Revised draft Federal Facility Agreement and Consent Order Changer Control Form adding B Plant's organic waste tank system to Milestone M-32-00.
2. Controlled Manual Waiver Request, #WA-543, "Annual leak test of waste storage tank," dated November 4, 1994.

ATTACHMENT 5

TPA MILESTONE M-32-00

**Interim Status Dangerous Waste Tank Systems Hanford Federal  
Facility Agreement and Consent Order Milestone  
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**M-32-00**

**Complete Identified Dangerous Waste Tank Corrective Actions**

**September 1999**

Completion of interim milestone tasks may identify the need for additional actions or interim milestones in the future. The reports and deficiency correction schedules prepared to satisfy current milestones will be used to identify any appropriate new interim milestones. Any new interim milestones will subsequently be established via the change process in Section 12 of the Action Plan.

Tank integrity assessments will not be required for terminal cleanout of the Plutonium-Uranium Extraction Plant, except for Tanks F18, U3, and U4. Integrity assessments for Tanks F18, U3, and U4 have been completed.

**M-32-01**

**Complete Plutonium Finishing Plant (PFP) Tank Interim Status Actions**

**December 1994**

Stabilization activities at the Plutonium Finishing Plant (PFP), dependent on evaluation of alternatives under the National Environmental Policy Act, will be limited to a liquid waste generation of 300,000 gallons or less to the 241-Z tank system. The waste is temporarily stored in the 241-Z Tank System prior to transfer to the Double-Shell Tank Farms. Following any such stabilization activity, the PFP will not initiate any additional mission(s), except as described below, that results in the discharge of waste to the 241-Z tanks prior to completion of tank system upgrades necessary for compliance with state and federal dangerous waste regulations.

Glove-box scale, laboratory, plant maintenance, and miscellaneous support activities necessary for safe, secure storage of materials and protection of personnel and the environment will continue. With exception of the stabilization activities, discharge to 241-Z will be limited to 50,000 gallons per year until compliance is achieved or terminal cleanout is completed. Any terminal cleanout discharge requirements in excess of 50,000 gallons per year will be reviewed and approved by the three parties prior to implementation.

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<b>M-32-01</b>	<b>Complete Plutonium Finishing Plant (PFP) Tank Interim Status Actions</b>	<b>December 1994</b>
M-32-01-T01	Complete and submit integrity assessment report for PFP interim status tank system. Provide a schedule to address any deficiencies described in the report related to tank system compliance (Deficiencies not addressed in this schedule will be addressed in the compliance strategy of target action M-32-01-T02).	October 1993
M-32-01-T02	Submit proposed compliance strategy for remaining dangerous waste tank system issues.	June 1994
M-32-01-T03	Complete construction of piping upgrades between 234-5Z, 236-Z and 241-Z Tank System (Project C-031H).	December 1994
<b>M-32-02</b>	<b>Complete 219-S Tank Interim Status Actions</b>	<b>September 1997</b>
M-32-02-T01	Provide notification of completion of Definitive Design for Project W-178 - Construction of Interim Status Tank System Upgrades for 219-S Tank System.	January 1996
M-32-02-T02	Upgrade existing transfer lines to meet secondary containment requirements.	September 1997
<b>M-32-03</b>	<b>Complete T Plant Tank Actions</b>	<b>September 1999</b>
M-32-03-T01	Implement periodic visual inspection and static leak test program for 2706-T and 211-T tanks.	October 1993
M-32-03-T02	Complete Conceptual Design Report (Project W-259) for T Plant tank system upgrades.	April 1994
M-32-03-T03	Submit schedule for completion of T Plant tank system upgrades (Project W-259).	June 1994
M-32-03-T04	Complete modification of 2706-T Staging Pad to eliminate accumulation of precipitation.	June 1994

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<b>M-32-03</b>	<b>Complete T Plant Tank Actions</b>	<b>September 1999</b>
M-32-03-T05	Install level indication device for 211-T tank.	June 1994
M-32-03-T06	Complete scheduled upgrades to T Plant tank system (Project W-259).	September 1999
<b>M-32-04</b>	<b>Complete Double-Shell Tank Interim Status Tank Actions</b>	<b>June 1994</b>
M-32-04-T01	Submit design standards review for one tank farm.	September 1993
M-32-04-T02	Prepare and submit report documenting non-destructive examination equipment development and implementation plans.	September 1993
M-32-04-T03	Complete all DST visual examination and prepare and submit reports.	September 1993
M-32-04-T04	Complete and submit the Transfer Facility Compliance Plan.	June 1994
M-32-04-T05	Submit to Ecology a final plan and schedule for completion of the Double-Shell Tank integrity assessments.	June 1994
<b>M-32-05</b>	<b>Complete 242-A Evaporator Interim Status Tank Actions</b>	<b>1 Month after hot restart</b>
M-32-05-T01	Complete and submit integrity assessment report for the 242-A Evaporator interim status tank system. Provide a schedule to address any deficiencies described in the report related to tank system compliance.	1 Month after hot restart
<b>M-32-06</b>	<b>Complete 244-AR Vault Interim Status Tank Actions</b>	<b>Prior to restart</b>
M-32-06-T01	Complete and submit integrity assessment report and identified upgrades for 244-AR Vault interim status tank system (except that DST transfer lines that penetrate the 244-AR Vault will continue to be used). Provide a schedule to address any deficiencies described in the report related to tank system compliance.	Prior to restart

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<b>M-32-07</b>	<b>Complete B Plant Interim Status Tank Actions</b>	<b>December 1995</b>
M-32-07-T01	Identify additional dangerous waste tanks and ancillary equipment that will be routinely used during cleanout and stabilization activities. Submit schedule to perform integrity assessments on identified additional dangerous waste tanks and ancillary equipment.  B Plant will not accept any waste for treatment, except waste generated as a result of on-going B Plant/WESF operations, without completion of tank integrity assessments and completion of upgrades necessary for compliance with WAC 173-303-640 or an applicable permit on systems used for the treatment, storage or disposal of the waste.	April 1994
M-32-07-T02	Complete and submit integrity assessment plan for Tanks 25-1, 25-2, 23-1, concentrator E-23-3, and identified ancillary equipment.	October 1994
M-32-07-T03	Complete and submit integrity assessment report for Tanks 25-1, 25-2, 23-1, concentrator E-23-3, and ancillary equipment as identified in the integrity assessment plan. Provide a schedule to address any deficiencies described in the report related to tank system compliance.  The integrity assessment report of the low level waste concentrator, E-23-3, and the concentrated waste receiver, TK-23-1, will be completed only if their operation is planned beyond December 1995. The determination to include these two tanks in the integrity assessment report will be made by October 1994.	December 1995
<b>M-32-08</b>	<b>Complete Grout Interim Status Tank Actions</b>	<b>Prior to processing DST waste</b>
M-32-08-T01	Complete and submit integrity assessment report for Grout interim status tank system. Complete activities required to correct any deficiencies described in the report related to tank system compliance.	Prior to processing DST waste

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Distribution List

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N. G. Awadalla	WHC	R2-76
J. J. Beyer	WHC	R3-35
J. E. Bramson	WHC	T5-54
P. J. Crane	WHC	T3-28
B. G. Erlandson	WHC	H6-20
C. J. Geier	WHC	R2-36
E. M. Greager	WHC	H6-20
R. D. Gustavson	WHC	R1-51
M. J. Hall	WHC	T6-07
S. M. Joyce	WHC	H4-21
S. E. Killoy	WHC	S6-70
P. S. Kube	RL	A5-15
D. J. McBride	WHC	T5-54
K. J. Oates	EPA	B5-01
M. D. Rollison	WHC	T6-12
A. R. Sherwood	WHC	H6-20
J. L. Waite	WHC	B2-35
D. W. Wilson	WHC	S6-70
R. W. Wilson	Ecology	B5-18

Please send comments on distribution list to A. R. Sherwood, H6-20, 376-6391.