

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

May 5, 1995
8:00 a.m. to 12:00 p.m.

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

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

Date: 5/23/95

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

Date: 5/24/95

Not Present
K. J. Oates
K. J. Oates, Unit Manager, EPA Region 10

Date: _____

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

Date: 06/19/95



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 - Draft Interim Milestone for the 325 Building Slab Tanks
- Attachment 5 - PFP Compliance Strategy Status Table
- Attachment 6 - Approved Target Actions for the B Plant Organic Solvent Waste Tanks
- Attachment 7 - 340 Complex/RLWS Presentation
- Attachment 8 - Draft Interim Milestone for the 340 Complex/RLWS Tank System and the Management Strategy

**MILESTONE M-32-00
UNIT MANAGERS MEETING
2440 Stevens Center
Richland, Washington**

**May 5, 1995
8:00 a.m. to 12:00 p.m.**

Agenda

I. UM ISSUES (8:00)

- a. 325 Bldg - Slab tanks interim milestone.
- b. PFP - Compliance strategy status (M-32-01-T02)
- c. B Plant - Approved organic solvent waste tanks target actions.
- d. 219-S - Budget cut impacts to Project W-087 (M-32-02-T02).

II. 340 Complex Presentation (11:00)

- a. 340 Complex/RLWS Description
- b. RCRA Compliance Issues
- c. Project W-302
- d. Proposed interim milestone

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UNIT MANAGERS MEETING
2440 Stevens Center
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Summary of Discussion, Agreements and Actions

I. UM ISSUES (8:00)

- 325 Bldg Slab Tanks - Mr. H. T. Tilden (PNL) provided the following details on the 325 Building Slab tanks. The three 90-day tanks each have a capacity of 83 gallons, are made of stainless steel and have dimensions of 6'X8'X3" (the dimensions were verified and corrected for these minutes). These tanks receives waste from the 325 High Level Radiochemistry Facility (HLRF) within the 325 Building. The waste is then subsequently transferred to the Radioactive Liquid Waste System. Mr. Tilden stated that PNL performed a visual inspection on these tanks and that the integrity assessment is in progress.

A proposed interim milestone (attachment 4) to include the slab tanks in M-32-00 was presented during the May 3, 1995 Project Managers Meeting. Ecology requested some changes to the interim milestone. Mr. Tilden, Mr. R. W. Wilson (Ecology) and Ms. J. J. Wallace (Ecology) are negotiating these changes outside of the M-32-00 UMM forum.

- PFP Compliance Strategy - Ms. A. R. Sherwood (WHC) updated Ecology on the status (attachment 5) of the PFP compliance strategy (submitted for M-32-01-T02). The only change from the last UMM (1/31/95) was that the completion date for Project C-196 is once again June 1995 (original date committed to in the PFP compliance strategy). During the 1/31/95 UMM, project completion was reported to be April 1995 (accelerated date). Also routing modifications to allow for daily visual inspections in lieu of secondary containment within the 234-5Z Building, rooms 179 and 191, were expected to be completed by September 1994. As stated during the 1/31/95 UMM, these modifications will be completed as part of Project W-196's activities. These lines have been taken out of service and will remain so until daily visual inspections can be provided, therefore there is no impact to the compliance commitments of the PFP strategy.
- B Plant Organic Solvent Waste Tanks - Mr. Wilson and Mr. P. S. Kube (RL) approved and signed the M-32-00 change control form (attachment 6) adding the organic solvent waste tanks' target actions to M-32-07. Copies of the signed change control form were given to Mr. Wilson and Mr. S. E. Killoy (WHC). The signed original was given to Mr. J. L. Waite (WHC).

Change Control Form Approval: The B Plant organic solvent waste tanks target actions (M-32-07-T04 and M-32-07-T05) have been approved.

- 219-S - Mr. M. J. Hall (WHC) and Mr. J. J. Beyer (WHC) provided the following update concerning the 219-S facility. As indicated in previous meetings, the completion date and the scope of Project W-087 (transfer line upgrades), will be affected by current budget cuts. Descoping options are being investigated and will be shared with Ecology. Preliminary descoping ideas are expected by the end of May. Mr. Beyer stated that WHC Projects has undertaken cost-saving measures to help minimize the impacts of the descoping.

Written direction from RL to descope the project is expected within the next week.

Action: Provide Mr. Wilson with preliminary descoping ideas as soon as practicable.

II. 340 Complex Presentation (11:00)

- 340 Complex/RLWS - Mr. R. W. Szelmezcza (WHC) provided the presentation on the 340 Complex and the RLWS (attachment 7).

In addition to the information in presentation handouts, Mr. Szelmezcza provided these details on the complex. Operations at the 340 Waste Handling Facility (which is part of the 340 Complex) began in 1954. The original floor within the 340 Vault was coated and later resurfaced due to high radiation fields resulting from tank overflows. It is unknown if the resurfaced floor was coated, but this will be determined and documented during the ongoing integrity assessment. During hydrostatic testing on the 340-A aboveground storage (AGS) tanks in 1961, the unvented tank lids were collapsed slightly. Subsequent testing of the tanks found them to be fit for use. New RLWS piping was installed in 1978 after leak tests of the old RLWS piping showed leaks in the direct-buried pipe. The new system provided double-walled piping, leak detection, local and remote alarms, and new valve boxes.

Next, Mr. Szelmezcza outlined the current condition of the 340 Complex and RLWS. Some of the details given during this part of the presentation were:

- Valve boxes: The valve boxes are coated, but the coating type and compatibility with the waste is undocumented. Two of these valve boxes have surface contamination resulting from maintenance activities. Alarms are periodically received due to condensate forming within the valve boxes. The accumulated water causing the alarm is sampled to confirm it is condensate, then cleaned up. Waterstops are not required for valve boxes in order to fulfill secondary containment requirements.
- RLWS piping: Underground piping encasements are drained annually to remove condensate. This liquid is sampled to confirm it is condensate. Integrity testing of the RLWS would generate more wastewater.
- Piping within generator buildings: There is single-wall piping without secondary containment within the generator buildings. This piping (except for the 327 building) is currently inspected on a daily basis. Single-wall piping without secondary containment within the 327 Building does not receive daily visual inspections because of access limitations in high radiation areas.
- Visual Inspections: Some components, like the 340 Vault tanks, are not visually inspected due to ALARA. Some components, like the 327 building piping and the 340-A AGS tanks, are infrequently inspected due to ALARA. Currently, inspections of the 340-A Building AGS tanks take the form of looking for leaks from the doorway. These tanks have a common feed line and bubbler level indicator and are used only for contingency cases (like Retention Process Sewer diversions). The tanks currently have approximately 1 foot of water in them for shielding purposes.

Another item briefly discussed was Project W-302, "340 Facility Secondary Containment and Leak Detection." This project, which would replace the 340 Vault tank system with a RCRA-compliant tank system, is currently not funded in FY 97 and beyond.

Finally, the draft interim milestone and management strategy which detail those activities needed to allow operations of the 340 Complex/RLWS in its current status were discussed. Along with items in the handouts, Mr. Szelmeczka pointed out that the draft interim milestone proposes visual inspections every operating day (defined as "24 hours after use") of the single-wall piping in the generator buildings. While daily inspections are currently performed, it is much more reasonable to perform inspections 24 hours after the piping is used as these pipelines are otherwise empty.

The following documents were given to Mr. Wilson:

- WHC-SD-WM-WP-250, "340 Facility Waste Tank System Integrity Assessment Plan, dated February 1994.
- Letter #95-PCA-252, "340 Complex Compliance with the Resource Conservation and Recovery Act (RCRA)," from J. E. Rasmussen (RL) and W.T. Dixon (WHC) to S. M. Alexander (Ecology) and D. R. Sherwood (EPA), dated March 28, 1995.
- Draft interim milestone for the 340 Complex/Associated RLWS Tank System and the Management Strategy.

Action: Mr. Szelmeczka and Mr. Tilden will provide Ms. Sherwood with input on acceptable implementation dates and completion dates for the visual inspections in the generator buildings, for the management strategy and for the interim milestone. In a couple of weeks, Ecology will be informed of these dates.

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UNIT MANAGERS MEETING
2440 Stevens Center
Richland, Washington**

**May 5, 1995
8:00 a.m. to 12:00 p.m.**

Attendance List

NAME	ORGANIZATION	PHONE #	MSIN
M. A. Barnard	RL	376-7254	L4-40
J. J. Beyer*	WHC	372-3913	R3-35
C. R. Delannoy	RL	373-9017	A5-15
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
D. G. Saueressig	WHC	376-9739	H6-24
A. R. Sherwood	WHC	376-6391	H6-20
G. L. Sinton	RL	373-7939	S7-55
C. D. Stuart	Ecology	736-3010	B5-18
R. W. Szelmezcza	WHC	373-4200	L4-96
H. T. Tilden	PNL	376-0499	P7-79
J. L. Waite	WHC	372-1772	B2-35
R. W. Wilson	Ecology	736-3031	B5-18
H. R. Vogel	PNL	373-9493	P7-68

* Attended 8:00 session only.

Attachment 4

Proposed Interim Milestone for the 325 Building Slab Tanks

Change Number M-32-94-2	Federal Facility Agreement and Consent Order Change Control Form <small>Do not use blue ink. Type or print using black ink.</small>	Date 4/12/95
Originator J. J. Sutey		Phone 372-4005
Class of Change <input type="checkbox"/> I - Signatories <input checked="" type="checkbox"/> II - Project Manager <input type="checkbox"/> III - Unit Manager		
Change Title ADD INTERIM MILESTONE M-32-09 FOR 325 BUILDING SLAB TANK INTEGRITY ASSESSMENT		
Description/Justification of Change <p>This is a new interim milestone for completing integrity assessments required by WAC 173-303-200(1)(b) of the 325 Building High Level Radiochemistry Facility (HLRF) slab tanks contained in Room 40A. Leak testing of the three slab tanks has been successfully completed. The tanks did not leak. The activities included as target dates under this interim milestone are established to bring the facility into full compliance with the integrity assessment requirements of the WAC.</p> <p>Background. The Pacific Northwest Laboratory (PNL) 325 Building HLRF accumulates mixed wastes from hot cell operations in three (3) critically safe slab tanks in Room 40A. These wastes are currently being generated during Tank Waste Remediation System (TWRS) tank core processing and hot cell cleanout activities. Accumulated wastes are periodically transferred to the 340 Building via the 300 Area Radioactive Liquid Waste System. Inspection and tank integrity assessments have been hampered due to the high radiation fields in Room 40A.</p> <p style="text-align:right;">Continued on page 2 of 2.</p>		
Impact of Change This change does not impact any other TPA Milestone or target date.		
Affected Documents Hanford Federal Facility Agreement and Consent Order, Appendix D.		
Approvals		Page 1 of 2
_____ <small>DOE</small>	_____ Date <input type="checkbox"/> Approved <input type="checkbox"/> Disapproved	
_____ <small>EPA</small>	_____ Date <input type="checkbox"/> Approved <input type="checkbox"/> Disapproved	
_____ <small>Ecology</small>	_____ Date <input type="checkbox"/> Approved <input type="checkbox"/> Disapproved	

**STATUS OF THE PROPOSED COMPLIANCE STRATEGY FOR THE
PLUTONIUM FINISHING PLANT INTERIM STATUS DANGEROUS WASTE STORAGE AND TREATMENT TANK SYSTEM**

REQUIREMENT	COMPLIANCE ACTION	STATUS
Inspections	Continue daily surveillance of the 241-Z tank system monitoring devices and data provided to satisfy the requirements of WAC 173-303-320.	Surveillances being performed daily.
Secondary Containment	No upgrades within 241-Z WSTF or 236-Z (PRF) as long as the waste tank system is operated within the guidelines specified in TPA M-32-01. Identification of new mission or determination that discharge limits will be exceeded will initiate variance request in accordance with 40 CFR 265.193(g).	No identified change in mission or expectation that discharge limits will be exceeded.
	Complete Project C-196, "234-5Z Secondary Containment Upgrades."	Construction has started and the project is scheduled to be completed by June 1995.
	Upgrade secondary containment in Room 152 if decision is made to continue operation of waste generating equipment.	No current plans for continued operation. Future use dependent upon PFP EIS.
	Eliminate chemical product overflows to waste system in Rooms 166 and 227.	Complete. September/December 1994.
	Complete Project C-031H, "PFP Liquid Effluent Treatment Facility."	Complete. September 30, 1994.
System Integrity	Upgrade laboratory sink drain systems in Rooms 179 and 191 to provide piping materials compatible with waste handling requirements.	Administrative prohibition on use of drains remains in place. Upgrades to be completed as part of Project C-196.
	Await outcome of PFP EIS before proceeding with repair or replacement of valve EMV-21-D.	PFP EIS is scheduled to be issued June 1996. The draft document is due August 1995.
	Complete engineering evaluation of pipe hangers within 241-Z D-4, D-7, and D-8 cells.	Complete. December 30, 1994.

Attachment 5

PFP Compliance Strategy Status Table

**STATUS OF THE PROPOSED COMPLIANCE STRATEGY FOR THE
PLUTONIUM FINISHING PLANT INTERIM STATUS DANGEROUS WASTE STORAGE AND TREATMENT TANK SYSTEM**

REQUIREMENT	COMPLIANCE ACTION	STATUS
Inspections	Continue daily surveillance of the 241-Z tank system monitoring devices and data provided to satisfy the requirements of WAC 173-303-320.	Surveillances being performed daily.
Secondary Containment	No upgrades within 241-Z WSTF or 236-Z (PRF) as long as the waste tank system is operated within the guidelines specified in TPA M-32-01. Identification of new mission or determination that discharge limits will be exceeded will initiate variance request in accordance with 40 CFR 265.193(g).	No identified change in mission or expectation that discharge limits will be exceeded.
	Complete Project C-196, "234-5Z Secondary Containment Upgrades."	Construction has started and the project is scheduled to be completed by June 1995.
	Upgrade secondary containment in Room 152 if decision is made to continue operation of waste generating equipment.	No current plans for continued operation. Future use dependent upon PFP EIS.
	Eliminate chemical product overflows to waste system in Rooms 166 and 227.	Complete. September/December 1994.
	Complete Project C-031H, "PFP Liquid Effluent Treatment Facility."	Complete. September 30, 1994.
System Integrity	Upgrade laboratory sink drain systems in Rooms 179 and 191 to provide piping materials compatible with waste handling requirements.	Administrative prohibition on use of drains remains in place. Upgrades to be completed as part of Project C-196.
	Await outcome of PFP EIS before proceeding with repair or replacement of valve EMV-21-D.	PFP EIS is scheduled to be issued June 1996. The draft document is due August 1995.
	Complete engineering evaluation of pipe hangers within 241-Z D-4, D-7, and D-8 cells.	Complete. December 30, 1994.

Attachment 6

Approved Target Actions for the B Plant Organic Solvent Waste Tanks

Change Number M-32-94-1	Federal Facility Agreement and Consent Order Change Control Form Do not use blue ink. Type or print using black ink.	Date 12/21/94
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Originator P. S. Kube	Phone (509) 373-9850
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Class of Change <input type="checkbox"/> I - Signatories <input type="checkbox"/> II - Project Manager <input checked="" type="checkbox"/> III - Unit Manager
--

Change Title Addition of Target Actions to B Plant Interim Milestone M-32-07.
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Description/Justification of Change <p>These proposed target actions establish Tri-Party Agreement compliance schedules for the B Plant organic solvent waste tank system managed under interim status.</p> <p>This tank system was not originally included in M-32-07 as operation of the organic solvent waste tank system was not planned beyond December 1995. Due to technical and funding issues, operation of the system beyond December 1995 will be necessary. When the organic solvent waste is removed from the tanks, the tanks will no longer be used.</p> <p>Tank system existing monitoring equipment includes tank level monitoring (air-purged dip tube system) and high level alarms.</p> <p>See attached sheet for continuation:</p>
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Impact of Change <p>This change establishes two new target actions for B Plant. These target actions do not impact the interim milestone for B Plant, nor any other Tri-Party Agreement interim or major milestone.</p>
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Affected Documents <p>Hanford Federal Facility Agreement Consent Order Action Plan, Appendix D, Table D and Action Plan Work Schedule.</p>

<p>Approvals</p> <p><u><i>P. S. Kube</i></u> <u>4/5/95</u> <input checked="" type="checkbox"/> Approved <input type="checkbox"/> Disapproved</p> <p>DOE Date</p>	
<p><u><i>Robert Z. Dai</i></u> <u>4/5/95</u> <input checked="" type="checkbox"/> Approved <input type="checkbox"/> Disapproved</p> <p>EPA Date</p> <p>Ecology</p>	

Add the following additional target dates to M-32-07:

M-32-07-T04 Consolidate organic solvent waste into two tanks and perform external visual inspection and structural integrity test of these tanks and associated tank supports. Dec. 95

Continue daily monitoring of overflow/leak detection devices (e.g., tank level detection, high level alarms) until organic solvent waste is removed from the B Plant canyon. No additional visual inspections, integrity tests, or secondary containment upgrades will be performed unless required by the new interim milestone proposed by target action M-32-07-T05.

M-32-07-T05 Perform chemical separation of radionuclides from the organic solvent waste to support a future engineering study of alternatives regarding disposition of the organic solvent waste. Dec. 95

Based on characterization data, the engineering study will also address storage requirements and the need for additional chemical separation of radionuclides to support storage and disposal requirements, if appropriate. Based on the engineering study, a new interim milestone will be submitted to provide a schedule supporting:

- 1) additional chemical separation activities, if required,
- 2) interim status compliance actions for storage of organic solvent waste, as appropriate,
- and 3) actions required for disposition of the organic solvent waste.

Attachment 7

340 Complex/RLWS Presentation

HANFORD FACILITY
340 COMPLEX/ASSOCIATED RLWS

M-32-00 Unit Managers Meeting
2440 Stevens Center/Conference Room 2664
May 5, 1995

OUTLINE

- 340 Complex/Associated RLWS
- 340 Complex Integrity
- 340 Complex Compliance Issues
- Project W-302
- Management Strategy

340 COMPLEX/ASSOCIATED RLWS

Purpose of 340 Waste Handling Facility:

- Central collection point for the RLWS. The RLWS is a network of tanks and piping which serves Hanford research and development laboratories in the 300 Area.
- Provides safe and convenient disposal pathway for radioactive liquid wastes from facilities undergoing closure and D&D
- Packages and ships solid LLW for small generators and facilities undergoing closure and D&D in the 300 Area
- After accumulation in the 340 tank system, waste is sampled, analyzed, and pumped into stainless steel railroad tank cars for shipment to the 204-AR receiving facility

340 COMPLEX/ASSOCIATED RLWS (cont'd)

300 Area Laboratories:

- 324 Waste Technology Engineering Laboratory
develop and study waste treatment technologies
- 325 Applied Chemistry Laboratory
analytical and process development, TWRS characterization
- 326 Material Science Laboratory
analytical and instrument development
- 327 Post-Irradiation Testing Laboratory
specialized organic and radiochemical analyses, currently addressing K-Basin issues
- 329 Chemical Sciences Building
specialized organic and radiochemical analyses

340 COMPLEX/ASSOCIATED RLWS (cont'd)

Two effluent systems feed the 340 tank system:

- Retention Process Sewer (RPS):

- Non-dangerous process wastewater with the *potential* for radioactive contamination
- Single-wall pipeline
- Radiation detectors in automatic diverter stations
- Discharges to RLWS during upset conditions
 - Upsets involve radioactive contamination only

340 COMPLEX/ASSOCIATED RLWS (cont'd)

- Radioactive Liquid Waste System (RLWS):
 - Radioactive liquid waste
 - Some designated "Dangerous Waste"
 - Includes RPS diversions
 - Two single-wall tanks in 340 Vault
 - Six single-wall tanks in catch basin in 340-A building
 - Double-walled underground pipelines
 - Valve boxes at junction points

340 COMPLEX COMPLIANCE ISSUES

System Integrity

- 340 Vault integrity assessment plan completed Feb. 1994
- Encasement piping leak tested in 1991
- Ultrasonic and visual testing of 340-A Tank System in 1989
- No written integrity assessment
- No annual integrity testing

340 COMPLEX COMPLIANCE ISSUES (cont'd)

Secondary Containment

- Two single-wall tanks in 340 coated concrete vault
- Six single-wall tanks with concrete sump in 340-A
- Single-wall pipes in coated concrete valve boxes
- Valve box and vault coating integrity is undocumented
- 340-A sump is not coated
- Presence of water-stops not verified for all joints
(waterstops not required at valve boxes)
- Buried pipes are stainless steel in synthetic pipe encasements
- Single-wall pipes in generator buildings

340 COMPLEX COMPLIANCE ISSUES (cont'd)

Leak Detection

- Leak detectors in sumps for 340 Complex single-wall components
- Leak detectors in encasement pipes
- Remote and local alarms for leak detection
- No deficiencies identified except in one generator building.

340 COMPLEX COMPLIANCE ISSUES

Operating Requirements

- Some components not visually inspected due to ALARA
- Some components infrequently inspected due to ALARA

PROJECT W-302

Project W-302: 340 Upgrades

- Would replace existing 340 Vault tank system with compliant tank system & provide batch neutralization
- Project cost - \$16M
- Not supported at target funding case for FY 97 and out-years.

340 COMPLEX MANAGEMENT STRATEGY

- 340 Tank Integrity Assessment
 - IAP is approved, report will be completed in 1996
 - Identify schedule to address deficiencies

340 COMPLEX MANAGEMENT STRATEGY (cont'd)

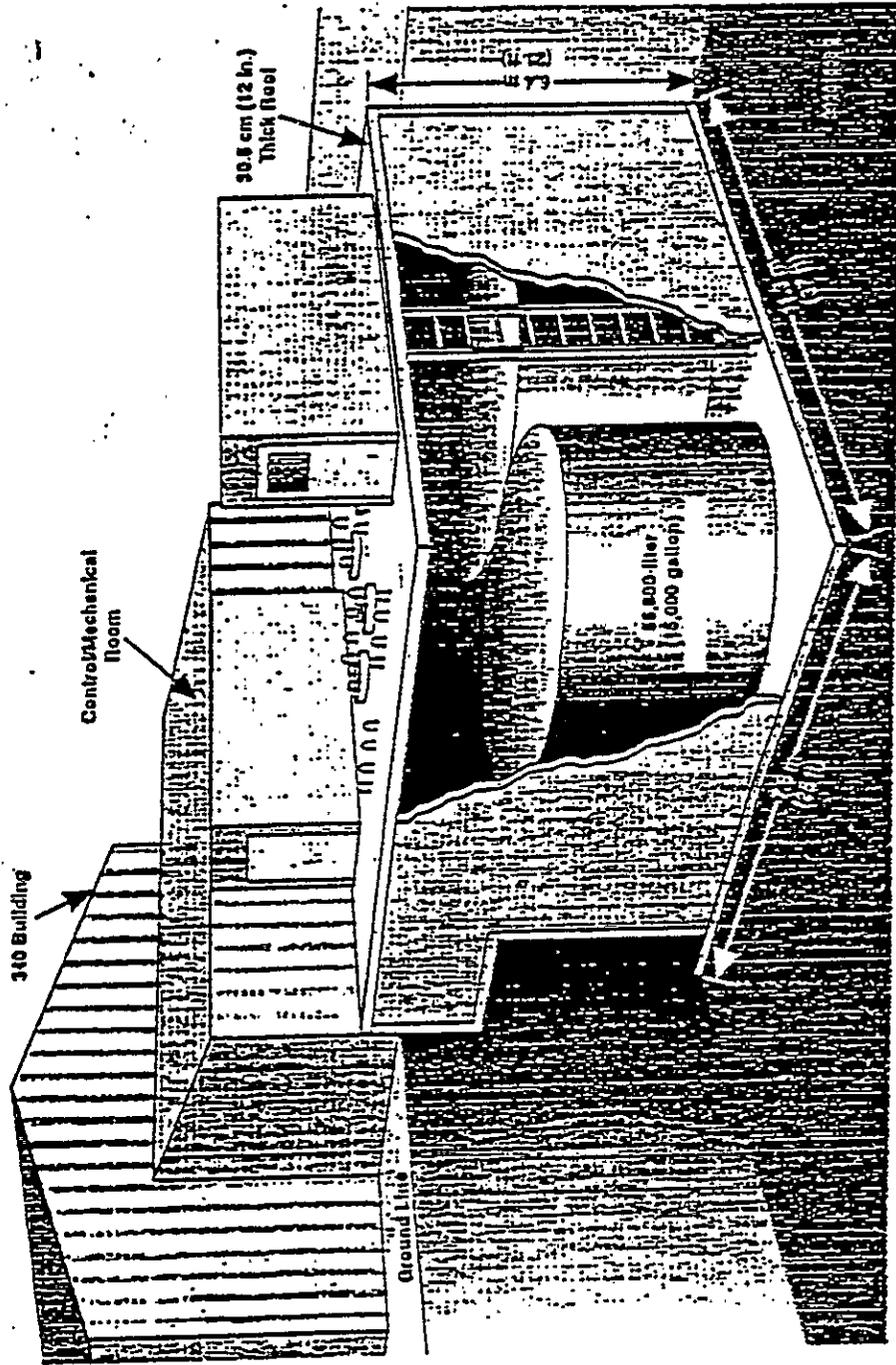
Other Activities

- Visual inspections within 24 hours of use for piping in generator buildings (each operating day)
- Double containment for the underground piping
- Continuous leak detection for:
 - 340 Vault
 - 340-A sump
 - underground RLWS
 - valve boxes

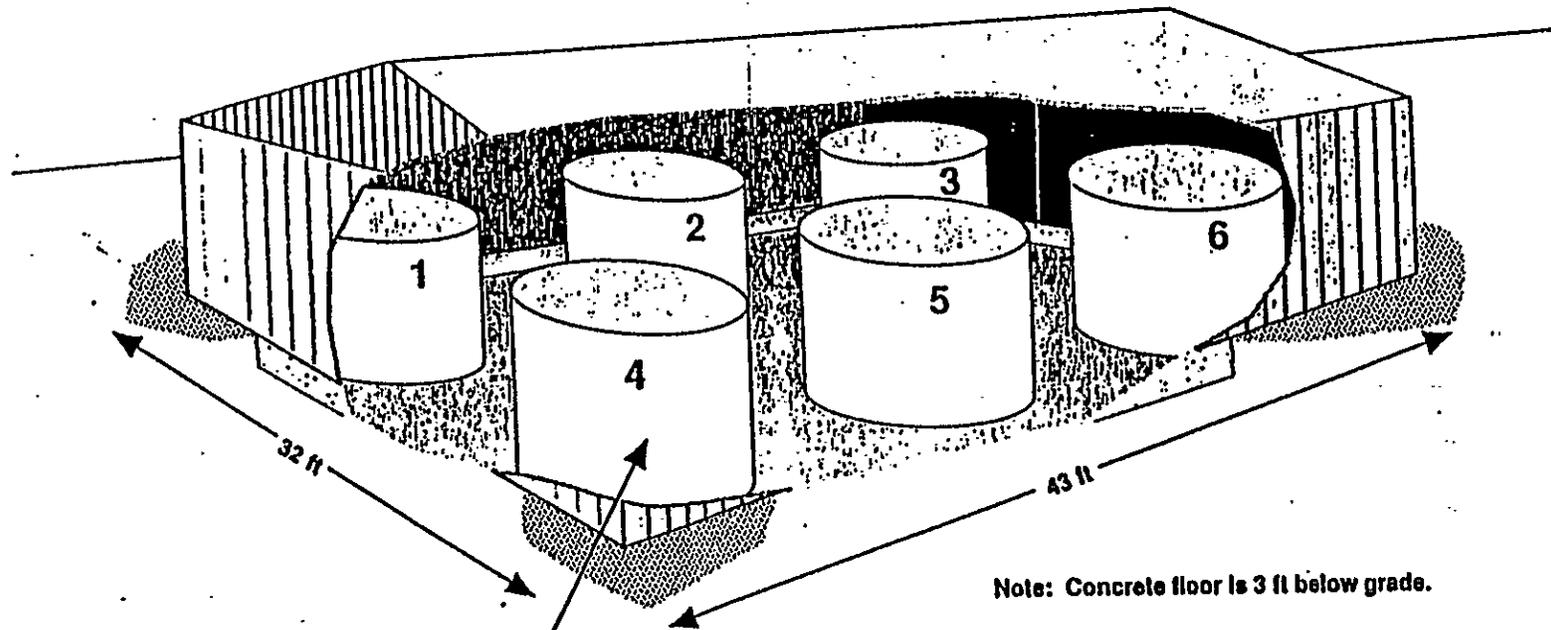
340 COMPLEX MANAGEMENT STRATEGY (cont'd)

- 24 hour removal capability for spills/leaks at
 - the 340 Vault
 - 340-A catch basin
 - valve boxes
- Overfill controls for the 340 Vault tanks
- Use 340-A tanks only for contingency purposes
- Daily inspections of data gathered from leak detection monitoring equipment

340 Vault



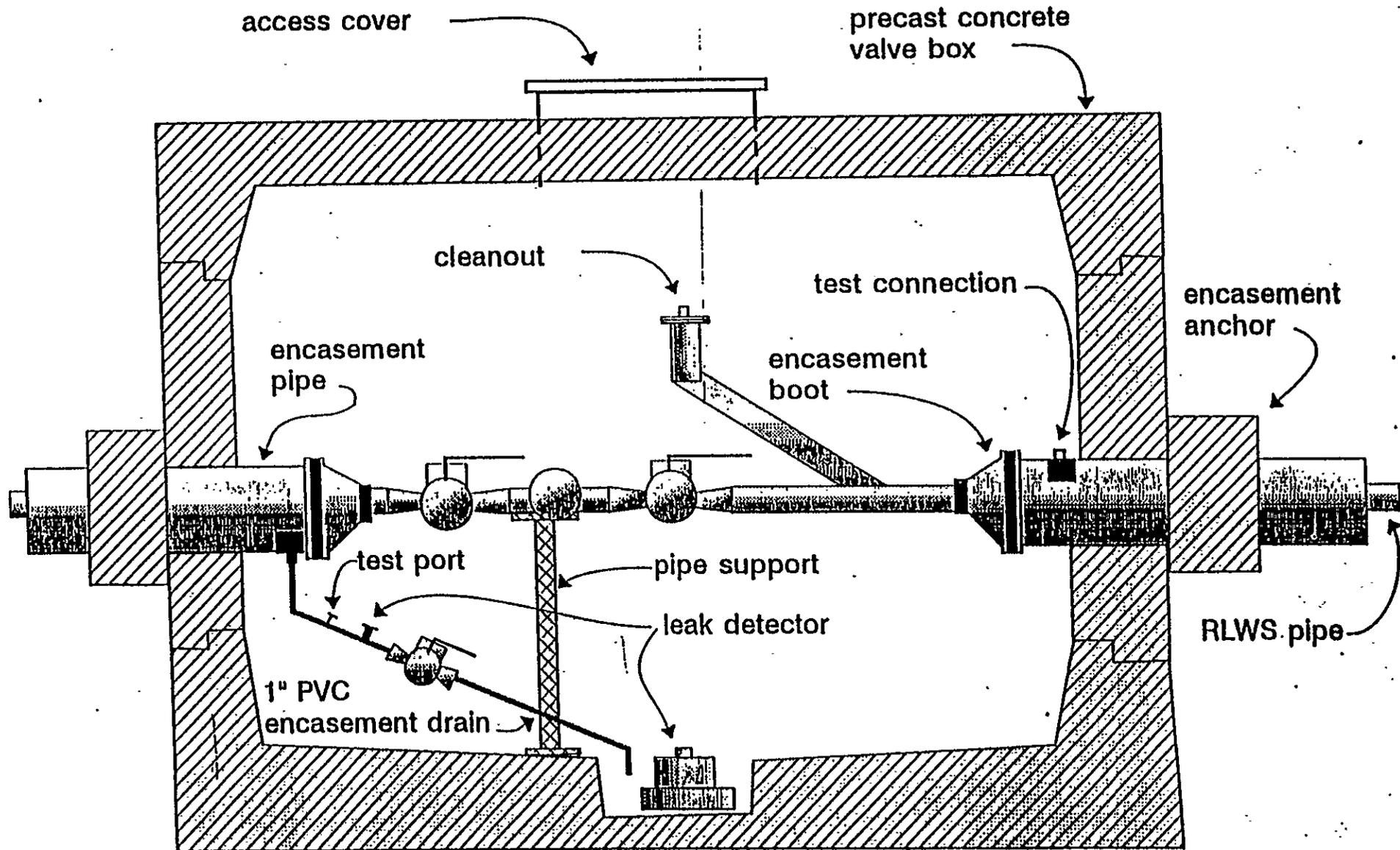
340-A Building



8,000-gal. Stainless
Steel Tanks

2.540 centimeter per inch
0.305 meter per foot
0.264 liter per gallon

RLWS VALVE BOX



Not to Scale

Attachment 8

**Draft Interim Milestone for the 340 Complex/RLWS Tank System
and the Management Strategy**

DRAFT

Change Number M-32-XX	Federal Facility Agreement and Consent Order Change Control Form <small>Do not use blue ink. Type or print using black ink.</small>	Date XX/XX/XX
Originator P. S. Kube		Phone (509) 373-9850
Class of Change <input type="checkbox"/> I - Signatories <input type="checkbox"/> II - Project Manager <input checked="" type="checkbox"/> III - Unit Manager		
Change Title Addition of interim milestone M-32-XX for the 340 Complex/Associated RLWS.		
Description/Justification of Change This new interim milestone establish Tri-Party Agreement target action schedules for the 340 Complex/Associated RLWS dangerous waste tank system while allowing their continued operations. The 340 Waste Handling Facility serves as a central collection point for the 300 Area Radioactive Liquid Waste System (RLWS). The RLWS is a network of tanks and piping with serves Hanford research and development laboratories in the 300 Area. Another service that the 340 facility provides is a safe and convenient disposal pathway for radioactive liquid wastes from 300 Area facilities undergoing closure and D&D. The 340 facility also packages and ships solid LLW for small generators and facilities undergoing closure and D&D in the 300 Area. See attached sheet for continuation. Note: The 340 Complex includes the 340 facility and transfer piping between the facility up to the first flange connection within the generator buildings. The 340 facility is comprised of the 340 Vault, the 340-A Building and the 340-B building.		
Impact of Change This interim milestone does not impact any other Tri-Party Agreement interim or major milestone.		
Affected Documents Hanford Federal Facility Agreement Consent Order Action Plan, Appendix D, Table D and Action Plan Work Schedule.		
Approvals _____ Date ___ Approved ___ Disapproved DOE		
_____ Date ___ Approved ___ Disapproved EPA		
_____ Date ___ Approved ___ Disapproved Ecology		

DRAFT
(05/03/95)

340 COMPLEX MANAGEMENT STRATEGY
M-32-XX-T02

Additions to this strategy may be needed based on the 340 Vault integrity assessment findings (target action M-32-XX-T01).

340 Vault:

- Continue to provide overflow controls, tank level monitoring, and leak detection at the 340 Vault.
- Continue to provide inspections of data gathered from leak detection monitoring equipment of the 340 Vault every operating day.
- Continue to provide capability of removing spills of dangerous waste from the 340 Vault within 24 hours of a spill or leak and continue operations without further secondary containment, daily visual inspections, and without annual integrity testing.

340 Complex Piping Systems:

- Maintain existing double-wall piping and continuous leak detection for the underground piping.
- Continue to provide continuous leak detection for piping in valve boxes and continue operations without integrity assessments and annual integrity testing.
- Designate the RLWS (outside buildings) as an underground piping system.
- Continue to provide inspections of data gathered from leak detection monitoring equipment of the underground RLWS every operating day.

340-A Tanks:

- Dedicate 340-A tanks for contingency purposes.
- Continue to provide continuous leak detection of the 340-A building sump.
- Continue to provide inspections of data gathered from leak detection monitoring equipment of the 340-A sump every operating day.
- Continue to provide capability of removing spills of dangerous waste from the 340-A sump within 24 hours of a spill or leak and continue operations without further secondary containment, daily visual inspections, integrity assessments, and without annual integrity testing.

DRAFT
340 Complex/Associated RLWS Tank System
Hanford Federal Facility Agreement and Consent Order Milestone
M-32-XX

M-32-XX	Complete Identified 340 Complex/Associated RLWS Dangerous Waste Tank Corrective Actions.	????
M-32-XX-T01	Complete and submit integrity assessment report for the 340 Vault dangerous waste tank system. Provide a schedule to address any deficiencies described in the report related to tank system compliance (340 Complex deficiencies not addressed in this schedule will be addressed in the management strategy of target action M-32-XX-T02).	Sept. 96
M-32-XX-T02	Implement 340 Complex management strategy for dangerous waste tank system issues.	????
M-32-XX-T03	Establish a program to provide visual inspections within 24 hours of use for piping in generator buildings which are not equipped with leak detection and secondary containment and provide an implementation date.	????

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

Unit Managers Meeting Minutes
May 5, 1995

Distribution List

M. A. Barnard	RL	L4-40
A. V. Beard	RL	S7-55
J. J. Beyer	WHC	R3-35
R. C. Bowman	WHC	H6-24
E. M. Bowers	RL	S7-55
J. E. Bramson	WHC	T5-54
P. J. Crane	WHC	T3-28
C. R. Delannoy	RL	A5-15
A. J. DiLiberto	WHC	H6-10
B. G. Erlandson	WHC	H6-20
E. M. Greager	WHC	H6-20
R. D. Gustavson	WHC	R1-51
D. L. Halgren	WHC	L6-04
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
L. W. Roberts	WHC	L6-05
M. D. Rollison	WHC	T6-12
D. G. Saueressig	WHC	H6-24
R. W. Szelmezcza	WHC	L4-96
A. R. Sherwood	WHC	H6-20
G. L. Sinton	RL	S7-55
C. D. Stuart	Ecology	B5-18
H. T. Tilden	PNL	P7-79
J. L. Waite	WHC	B2-35
R. N. Warren	RL	A5-18
J. D. Williams	WHC	H6-28
D. W. Wilson	WHC	S6-70
R. W. Wilson	Ecology	B5-18
H. R. Vogel	PNL	P7-68

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