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Meeting Minutes Transmittal

224-T TRANSURANIC WASTE STORAGE AND ASSAY FACILITY
Unit Managers Meeting
Federal Building, Room 784B
Richland, Washington

June 1, 1994
10:00 a.m. - 12:00 p.m.

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

Clifford E. Clark, Unit Manager, RL Date: _____

Not Present Date: _____
Daniel L. Duncan, RCRA Program Manager, EPA Region 10

Alisa D. Huckaby Date: 9/13/94
Alisa D. Huckaby, Unit Manager, Washington State Department of Ecology

224-T Transuranic Waste Storage and Assay Facility, WHC Concurrence

Richard D. Rierce Date: 9/13/94
Richard D. Rierce, Contractor Representative, WHC
(Represented by Barbara J. Broomfield, WHC)

Purpose: Discuss Permitting Process

Meeting Minutes are attached. The minutes are comprised of the following:
Attachment 1 - Agenda
Attachment 2 - Summary of Discussion and Commitments/Agreements
Attachment 3 - Attendance List
Attachment 4 - Action Items



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Attachment 1

224-T TRANSURANIC WASTE STORAGE AND ASSAY FACILITY
Unit Managers Meeting
Federal Building, Room 784B
Richland, Washington

June 1, 1994
10:00 a.m. - 12:00 p.m.

Agenda

1. MEETING MINUTES
2. STATUS OF RESPONSE TO NOTICE OF DEFICIENCY
3. ACTION ITEMS
4. STATUS OF RESPONSE TO COMPLIANCE LETTER FROM MS. L. RUSSELL DATED
DECEMBER 13, 1993
5. GENERAL DISCUSSION
6. SET NEXT MEETING DATE

9021-5676/16
9/13/95-1206

Attachment 2

224-T TRANSURANIC WASTE STORAGE AND ASSAY FACILITY
Unit Managers Meeting
Federal Building, Room 784B
Richland, Washington

June 1, 1994
10:00 a.m. - 12:00 p.m.

Summary of Discussion and Commitments/Agreements

1. MEETING MINUTES

The March 15, 1994 Unit Manager Meeting minutes are still being reviewed. There were no Unit Manager Meetings held in April or May 1994.

2. STATUS OF RESPONSE TO NOTICE OF DEFICIENCY

Mr. D. Saueressig (WHC) stated that RL/WHC submitted the NOD responses to the regulators on May 26, 1994. Mr. C. Clark (RL) suggested that RL/WHC and the regulators initiate the NOD workshop meetings. Ms. A. Huckaby (Ecology) responded that due to the reorganization within Ecology, and her review of the assay and x-ray equipment, she was not ready to begin the workshops. Ms. Huckaby noted that one more response should resolve several of the NODs.

Ms. Huckaby stated that since there is no waste analysis plan (WAP) included in the permit application, she would be reviewing the use of the assay and x-ray equipment in an effort to incorporate the equipment into a WAP. Ms. Huckaby noted that the information derived from the equipment is very good. Mr. Clark pointed out that TRUSAF is a nondestructive analytical facility, and the permitting requirements should not address the specific analytical equipment. Ms. Huckaby responded that certain requirements and flexibility could be built into the permit application.

Ms. Huckaby referred to the NOD comment that usage of the assay equipment should be included in the Part A permit application, and stated that the Part A should reflect the assay equipment could be used for any kind of waste, not just the waste stored at TRUSAF in drums. Mr. R. Bowman (WHC) stated that WHC's NOD response was in reference to radioactive waste only. Mr. Clark added that the issue involves jurisdiction over radionuclides.

Ms. Huckaby stated that the option is to receive any kind of waste at the TRUSAF facility, and the parameters of the management of different types of waste need to be addressed in the Part B permit application. Mr. Clark responded that the Part B should include a description of the activities at the facility; however, the intent would not be for some of those activities to be permitted.

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Ms. Huckaby referred to the potential management of the backlog drums in the event the process knowledge is determined to be incorrect. Mr. Clark stated that the material would be managed according to the designation unless the analytical information showed the designation was improper in some sense. In which case then we have to make a choice, either we manage it in the most conservative manner or go back and do something else to make sure that we know what's in the drum. Mr. Clark stated that at that point the WAP should address the action to take. Mr. Bowman noted that one of the NOD responses did commit to providing an updated WAP, which would include the nondestructive equipment at TRUSAF as part of the confirmation process.

Ms. Huckaby reiterated her concern regarding resolution of the hot cells. RL/WHC and Ecology agreed that revision of the permit application would not begin until all the NOD comments have been resolved.

3. ACTION ITEMS

Action item 11-4-93:2, WHC will compare the estimated annual quantities for stored waste with the amounts that have been stored for the past three years, and adjust the estimates in the part A permit application that need to be increased. This action item was closed at the January 1993 Unit Managers Meeting.

Action item 3-15-94:1, WHC will provide Ecology (Ms. Huckaby) a copy of the engineering study and the analysis that was done to identify compliance issues at TRUSAF, and a copy of the ADSs related to TRUSAF's proposed budget. Mr. Saueressig stated that copies of the engineering study and the ADSs are now available, and that he would provide the information as soon as possible. This action item was left open.

4. STATUS OF RESPONSE TO COMPLIANCE LETTER FROM MS. L. RUSSELL DATED DECEMBER 13, 1993

Mr. J. Pratt (WHC) provided an update regarding Ecology's December 13, 1993 compliance letter. The letter was a follow up on two inspections conducted on November 18 and 22, 1993.

Mr. Pratt addressed the first compliance issue concerning the maintenance of all the emergency equipment, and stated that the emergency equipment discussed in the emergency plan is now in place.

The second compliance issue concerned maintenance of the operating records in a manner sufficient to locate the waste within the facility. Mr. Pratt explained that the manager of the operating records was not present during the inspection, and the paperwork could not be located for a couple of drums. The system has since been updated and is in the process of being implemented. Mr. Pratt stated that the system incorporates the solid waste information tracking system (SWITS).

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The third compliance issue addressed the failure to label containers with hazardous waste labels in a manner which adequately identifies the major risk associated with the contents of the containers; and failure to store containers within a compliant secondary containment system. Mr. Pratt explained that the containers noted without the hazardous waste stickers contained lead-lined gloves. Mr. Pratt stated that every container has been sorted, and the containers with the lead-lined gloves now have a hazardous waste label.

Mr. Pratt stated that the stored dangerous waste containers now meet the requirements since the floor sealing has been completed.

Ms. L. Russell (Ecology) referred to the second corrective action, and inquired about the status for locating waste within the facility. Mr. Pratt estimated that the operators are 15 to 20 percent complete inputting the information into SWITS, and that the location of the waste will be based on the pin number. Ms. Russell asked whether or not the corrective action has been completed. Mr. Pratt explained that the waste could either be located through SWITS or the receipt and log books. Ms. Huckaby inquired about access to the computer and the maintenance of hard copies containing location of the waste. Mr. Pratt responded that the computer is located in a trailer next to the facility, and when waste is received or the configuration of the waste storage changes, a hard copy will be generated and filed.

Ms. Huckaby inquired about the receiving and storage areas. Mr. Pratt explained that the first floor will be used for receiving and processing waste only, and the second and third floors will be used for storage. Ms. Huckaby asked if SWITS would track waste being analyzed but not stored at TRUSAF. Mr. Pratt indicated that a temporary holding area for waste designated to be sent to another storage facility could be established, and a system to input and track that waste through SWITS could be set up. Mr. Clark suggested including that capability into the Part B permit application. Ms. Russell and Ms. Huckaby agreed that the waste should be tracked whether it is being held temporarily during analysis or stored permanently.

5. GENERAL DISCUSSION

Ms. Huckaby asked if the floor sealing was completed to any specification, and stated that during her last visit to the facility there were forklift scratches and bubbles on the floor. Mr. Pratt responded that the floor sealing was done to specifications, and that the scratches on the floor had all been repaired, noting that the pads on all the forklifts are being replaced with wheels. Mr. Pratt added that in the event any floor damage occurs, the painters would repair the damage with the sealing material. Mr. B. Wilson requested that the manufacturer's specifications for applying the floor sealing material be available at the facility. Ms. Huckaby recommended that the

permit application include a condition that the manufacturer specifications for the material being used are adhered to.

Ms. Huckaby initiated a discussion regarding the roof, and inquired about the roof evaluation. Mr. Pratt stated that an evaluation of the structural integrity of the roof had been performed. Ms. Huckaby requested a copy of the report. Ms. Huckaby then noted that the roof leaks on the second and third floor, and requested RL/WHC initiate a leakage evaluation of the roof.

6. SET NEXT MEETING DATE

The next Unit Managers Meeting was scheduled for July 7, 1994.

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Attachment 4

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Richland, Washington

June 1, 1994
10:00 a.m. - 12:00 p.m.

Action Items

Action Item #

Description

3-15-94:1

WHC will provide Ecology (Ms. Huckaby) a copy of the engineering study and the analysis that was done to identify compliance issues at TRUSAF, and a copy of the ADSs related to TRUSAF's proposed budget.

ACTION: D. Saueressig (WHC)

OPEN

6-1-94:1

WHC will provide Ecology (Ms. Huckaby) information regarding evaluation of the integrity of the roof.

ACTION: D. Saueressig (WHC)

OPEN

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D. G. Saueressig	WHC	H6-24
RCRA Files/GHL	WHC	H6-23

ADMINISTRATIVE RECORD: 224-T Transuranic Waste Storage and Assay Facility,
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