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Meeting Minutes Transmittal - Approved

Unit Managers Meeting
4843 ALKALI METAL STORAGE FACILITY
2440 STEVENS CENTER, RM 1600
Richland, Washington

Meeting Held March 17, 1994
From 10:00 am to 12:00 noon

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

Randall N. Krekel Date: 4-14-94
Randall N. Krekel, Unit Manager, RL

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

Alisa D. Huckaby Date: 4/14/94
Alisa D. Huckaby, Unit Manager, Washington State Department of Ecology

4843 Alkali Metals Storage Facility, WHC Concurrence

Fred A. Ruck III Date: 4/14/94
Fred A. Ruck III, Contractor Representative, WHC

J. A. (Mickey) Seamans Date: 4/14/94
J. A. (Mickey) Seamans, Contractor Representative, 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
- Attachment 5 - NOD Response Table Summary of Open Comment Status
- Attachment 6 - NOD Comment No. 51.
- Attachment 7 - NOD Comment No. 85.



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Attachment 1

Unit Managers Meeting
4843 ALKALI METAL STORAGE FACILITY
2440 STEVENS CENTER, RM 1600
Richland, Washington

Meeting Held March 17, 1994
From 10:00 am to 12:00 noon

Agenda

1. Approval of Past UMM Minutes
2. Status Action Items
 - 7/14/93:1
 - 7/14/93:2
 - 2/28/94:1
3. Status Closure Activities
 - Status of Ecology Review of NOD Comments
 - Status of RL/WHC response to NOD Comments
 - Aerial Photographs of 4843 AMSF
 - Comments for Clarification
 - Comments Proposed for Closure
 - Identification of issues
 - Scheduling of Workshop to resolve issues
4. New Business
 - None
5. Set Next Meeting Date

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Attachment 2

Unit Managers Meeting
4843 ALKALI METAL STORAGE FACILITY
2440 STEVENS CENTER, RM 1600
Richland, Washington

Meeting Held March 17, 1994
From 10:00 am to 12:00 noon

Summary of Discussion and Commitments/Agreements

1. Approval of Past UMM Minutes

The February 18, 1994 meeting minutes were reviewed and approved.

2. Status Action Items

- 7-14-93:1 Arrange for Ecology to attend radiation survey of 4843 AMSF

Pending. Awaiting removal of waste from 4843 AMSF and scheduling of the survey. An additional waste overpack container needs to be ordered and received before final waste shipments can occur. The survey is now expected to occur toward the end of the 2nd quarter of 1994.

- 7-14-93:2 Provide Ecology with copy of the radiation survey procedure

Pending. Radiation survey documents will be provided once the date of the survey is determined. Copies of the Health Physics Procedures (WHC-IP-0718) and the WHC Radiological Control Manual (WHC-CM-1-6) were provided to Ecology at the December 14, 1993 UMM.

- 2-18-94:1 Arrange and schedule the DQO meeting for 4843 AMSF.

Pending. Work is continuing on scheduling the meeting.

3. Status Closure Activities

- Status of Ecology Review of NOD Comments

Ecology (A. D. Huckaby) indicated that their review of the NOD Comments had been completed and the NOD Response Table transmitted to RL/WHC on February 28, 1994.

- Status of RL/WHC response to NOD Comments

WHC (J. G. Adler) stated that RL/WHC had received the completed NOD Response Table on March 1, 1994. A summary list (attachment 6) identifying the status (as understood by RL/WHC) the remaining 29 open comment was distributed. The summary list also identified the remaining unresolved issues. The contents of this list was discussed by Ecology (A. D. Huckaby), RL (R. N. Krekel), and WHC (J. G. Adler and J. A. Seamans). The significant areas included on the agenda are discussed below.

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- Aerial Photographs of 4843 AMSF

In NOD Response Table Comment No. 5, Ecology has requested copies of aerial photographs of the 4843 AMSF. RL/WHC will take an action item (3-17-94:1) to provide these to Ecology at a future Unit Manager's Meeting.

- Comments for Clarification

WHC (J. G. Adler) stated that there are two comments that need clarification: No. 51 and No. 85.

On Comment No. 51, clarification was request on how the text from the previous comment/response cycle should be handled. Ecology (A. D. Huckaby) stated that only the new material needed to be incorporated into the NOD Response Table. However, when the comment was repeated in the new Ecology Responses, Ecology feels that the earlier comments have not been fully resolved. WHC stated that they would work to address all open issues in this round of responses.

On Comment No. 85, WHC requested clarification on the scope of the 'additional information.' Ecology stated that the 'additional information' was the full identification of all possible contingencies. Ecology and RL/WHC then discussed this issue, how it related to the 4843 AMSF closure plan, and what should be included in the closure plan. Ecology and RL/WHC agreed that, for the closure plan, the scope of the contingencies was limited, that a justification of the limited scope should be included in the closure plan, and a general statement (instead of detailed break-out) on dealing with contingencies would be included in the revised closure plan.

As part of the comment clarification discussion, Ecology asked if they would have the opportunity to review the revisions to the closure plan before it is issued. (Some revised text had been included in the NOD Response Table.) WHC responded that it depends on the situation. RL/WHC tries to included text changes in the closure plan. This method has been effective when there are limited changes to specific section. For the 4843 AMSF Closure Plan, this may not be possible. It is WHC's opinion that the closure plan is in need of a major rewrite. The rewrite will incorporate the changes requested by Ecology and major changes to bring the plan contents up to current standards. The scope of the rewrite will make providing the draft text as part of the NOD Response Table impractical.

- Comments for Consolidation

WHC (J. G. Adler) stated that RL/WHC are proposing the consolidation and closure of two comments. This consolidation and closure would be handled in the same manner as the closure and consolidation of comments agreed to at the September 8, 1993 Unit Manager's Meeting.

The first comment being considered is No. 86, which would be closed and consolidated into Comment No. 28. Both comments address the

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issue of sampling the insulation above the metal interior walls in the 4843 AMSF.

The second comment being considered is No. 84, which would be closed and consolidated into Comment No. 81. Both comments address Ecology's concerns on sampling the oil stains on the concrete floor.

Ecology (A. D. Huckaby) stated that there were no objections to consolidating and closing the comments as described.

- Comments Proposed for Closure

The summary list (attachment 5) identifies a number of NOD Comments that, with one additional response, can be closed out. The comments have been divided into two groups: comments that can be closed as is and comments that can be closed but identify specifics for the next revision of closure plan. The draft responses will be provided at a future issue resolution meeting or Unit Manager's Meeting for Ecology's review. If any of the proposed responses do not meet Ecology's requirements, those comments will then be fully discussed and resolved as part of the issue resolution process.

(Please note the following errors in attachment 5: Comment No. 83 has been duplicated and should be deleted from the 'Proposed for Closing' list. Comment No. 5 should be added to the 'Proposed for Closing' list. Comment No. 75 should be added to the 'Proposed for Closing, Pending Revision of the Closure Plan' list.)

- Identification of issues

The remaining issues needing resolution were identified and discussed. The issues are summarized below:

- DQO-related (oil in waste, oil stains on floor, concrete inorganic analysis, insulation sampling, and the number of samples)
- Radiological (both jurisdiction and content in closure plan)
- What is included in the closure plan verses the decontamination (formally decommissioning) work plans,
- When closure cost estimates are provided, and
- How the term 'action level' should or should not be used.

An issue resolution meeting has been scheduled for Thursday, March 24, 1994 to begin addressing these issues and the other remaining open NOD comments.

- Scheduling of Workshop to resolve issues

Ecology (A. D. Huckaby), RL (R. N. Krekel) and WHC (J. G. Adler) agreed to meet on Thursday, March 24, 1994 to start the issue resolution process for the remaining NOD comments.

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4. **New Business**

- **Funding of RCRA Closure Requirements**

Ecology (A. D. Huckaby) discussed with RL (R. N. Krekel) and WHC (J. G. Adler and J. A. Seamans) the budget meetings that RL/WHC had given to Ecology. RL/WHC provided additional information on how the Hanford budgeting process works and what the information can mean. Overall, the discussion was general in nature and did not focus specifically on the funding for the 4843 AMSF Closure Plan.

5. **Set Next Meeting Date**

The next meeting has been set for April 14, 1994, for 10:00 am in Richland, Washington.

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Attachment 4

Unit Managers Meeting
4843 ALKALI METAL STORAGE FACILITY
2440 STEVENS CENTER, RM 1600
Richland, Washington

Meeting Held March 17, 1994
From 10:00 am to 12:00 noon

Action Items

<u>Action Item #</u>		<u>Description</u>
07-14-93:1	OPEN	Arrange for Ecology to attend radiation survey of 4843 AMSF. (WHC: J. G. Adler)
07-14-93:2	OPEN	Provide Ecology with copy of the radiation survey procedure. (WHC: J. G. Adler)
02-18-94:1	OPEN	Arrange and schedule the DQO meeting the 4843 AMSF. (WHC: J. G. Adler)
03-17-94:1	NEW	Provide aerial photographs of the 4843 AMSF to Ecology. (WHC: J. G. Adler)

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Attachment 5

Unit Managers Meeting
4843 ALKALI METAL STORAGE FACILITY
2440 STEVENS CENTER, RM 1600
Richland, Washington

Meeting Held March 17, 1994
From 10:00 am to 12:00 noon

TITLE - NOD RESPOSNE TABLE SUMMARY OF OPEN COMMENT STATUS

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NOD RESPONSE TABLE SUMMARY OF OPEN COMMENT STATUS
MARCH 16, 1994

Comments needing clarification:
51, 85

Comment proposed for consolidation:
86 into 28, 84 into 81

Comments proposed for closing:
69, 70, 71, 80, 83
(Draft resolution comments to be provided at a latter date)

Comment proposed for closing, pending revision of the closure plan:
27, 32, 52, 59, 83
(Draft resolution comments to be provided at a latter date)

ISSUES:

DQO related 4 (oil in waste), 26 (concrete inorganic analysis), 28 and 86 (insulation sampling), 31 (number of samples), 81 and 84 (oil stains on floor)

Radiological 2, 9, 12, 51 (relative to including radiological material counts), 67, 70

Decon Work Plans 39, 63

Closure Cost Estimates 61

Action level definition 15

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Attachment 6

Unit Managers Meeting
4843 ALKALI METAL STORAGE FACILITY
2440 STEVENS CENTER, RM 1600
Richland, Washington

Meeting Held March 17, 1994
From 10:00 am to 12:00 noon

TITLE - NOD COMMENT NO. 51.

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51. ECOLOGY COMMENT #1: General. Appendix C appears to contain the April 1991 waste inventory for the 4843 AMSF. During review of the inventory, it was noted that the wastes were not presented in numerical order and also that numbers appear to have been omitted (i.e., numbers 13-43, 46, 48, etc.). Please provide an explanation of the omissions. Also, please provide an explanation of the radiological material counts. Do these counts represent the monthly radiation survey for April 1991?

RL/WHC RESPONSE #1: As waste drums (both radioactive mixed and non-radioactive dangerous waste) were received into the 4843 AMSF they were numbered in a chronological order. As time passed, 39 drums of radioactive mixed waste were repackaged into 10 drums, 2 drums became 4, etc. The total amount of waste has remained constant, but the number of containers has been reduced. The duplicate containers were not included on the all-time inventory because it would have artificially increased the amount of waste stored in the 4843 AMSF. The next revision of the closure plan will have additional explanatory information added to Appendix C "Current Waste Inventory."

At any given time, the radiological material counts represent the results of the latest monthly radiological survey of the waste stored in the 4843 AMSF. This survey is performed in accordance with Health Physics procedures.

ECOLOGY COMMENT #2: Appendix C appears to contain the April 1991 waste inventory for the 4843 AMSF. During review of the inventory, it was noted that the wastes were not presented in numerical order and also that numbers appear to have been omitted (i.e., numbers 13-43, 46, 48, etc.). Please provide an explanation of the omissions. Also, please provide an explanation of the radiological material counts.

Concur with the inclusion of additional explanatory information to Appendix C "Current Waste Inventory." The original comment was intended to generate a complete identification of all wastes stored at this unit

Therefore, while an explanation of the omissions is appreciated (and may explain the data gaps), please confirm if the information included within Appendix C represents the complete waste inventory for the applicable life of this unit.

Concur with the explanation of the radiological material counts. It is requested that a footnote or explanation be added to the Appendix C inventory to provide this additional information regarding the description of the wastes.

Attachment 7

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Meeting Held March 17, 1994
From 10:00 am to 12:00 noon

TITLE - NOD COMMENT NO. 85.

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85. ECOLOGY COMMENT #1: 7.3.3. A more detailed description of decontamination verification procedures should be included. The details should specify how decontamination verification will be conducted in the event that it is necessary to repeat decontamination verification. To further explain, if decontamination verification is repeated, the closure plan should specify if samples will be collected from the same random and biased locations, if samples will be collected using chipping, coring, or a combination of chipping and coring methods, etc.

RL/WHC RESPONSE #1: As part of Revision 1 of the closure plan, Section 7 will include additional information on the activities associated with repeat verification sampling.

ECOLOGY COMMENT #2: Concur with the inclusion, in Section 7, of additional information on the activities associated with repeat verification sampling. The reviewer requests an identification of the requested additional information during the DQO process or the above referenced Unit Manager workshop meetings prior to the revision of the closure plan.

Distribution:

J. G. Adler	WHC	H6-23
J. K. Bartz	GSSC	B1-42
R. C. Brunke	WHC	H6-23
R. M. Carosino	RL	A4-52
D. L. Duncan	EPA	HW-106 (Seattle)
O. A. Farabee	RL	N1-39
R. G. Hastings	RL	N1-39
A. D. Huckaby	Ecology	B5-18
R. N. Krekel	RL	A5-15
P. J. Mackey	WHC	B3-15
S. M. Price	WHC	H6-23
F. A. Ruck III	WHC	H6-23
J. A. Seamans	WHC	N2-04
J. L. Waite	WHC	B2-35
RCRA file/GHL	WHC	H6-23
Field File Custodian	WHC	H6-08

ADMINISTRATIVE RECORD: 4843 ALKALI METAL STORAGE FACILITY (S-4-1) [Care of EPIC, WHC (H6-08)]

Washington State Department of Ecology Nuclear and Mixed Waste, Hanford Files, P.O. Box 47600, Olympia, Washington 98504-7600

Environmental Protection Agency Region 10, Seattle, Washington 98101, Record Center, Mail Stop HW-074

Please send comments on distribution list to Kym D. Tarter (H6-23), (509) 376-4701.

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