

Meeting Minutes Transmittal

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

December 16, 1993
9:00 a.m. - 10:30 a.m.

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

RC Bowman for Date: 1/31/94
Clifford E. Clark, Unit Manager, RL
(Represented by Roger C. Bowman, WHC)

[Signature] Date: 1/31/94
Daniel L. Duncan, RCRA Program Manager, EPA Region 10

Arlisa D. Huckaby Date: 1/31/94
Arlisa D. Huckaby, Unit Manager, Washington State Department of Ecology

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

[Signature] for Date: 1/31/94
Richard D. Pierce, 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 - Copy of Compliance Letter from Ecology dated 12-13-93
 - Attachment 6 - Pilot Retrieval of Hanford Transuranic Waste



9413149-0825

Attachment 1

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

December 16, 1993
9:00 a.m. - 10:30 a.m.

Agenda

1. MEETING MINUTES
2. STATUS OF PERMIT APPLICATION
3. COMPLIANCE LETTER FROM MS. L. RUSSELL
4. ACTION ITEMS
 - OVERVIEW ON TRU RETRIEVAL PILOT PROJECT
 - PART A PERMIT APPLICATION INFORMATION
 - STATUS OF PROCESS CELLS ATTACHED TO THE 224-T TRUSAF PER THE TPA
5. SET NEXT MEETING DATE

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Attachment 2

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

December 16, 1993
9:00 a.m. - 10:30 a.m.

Summary of Discussion and Commitments/Agreements

1. MEETING MINUTES

The November 4, 1993 Unit Manager Meeting minutes were approved and signed. Mr. D. Saueressig (WHC) received approval from Mr. D. Duncan (EPA) via the videoconference to sign the minutes for EPA.

2. STATUS OF PERMIT APPLICATION

Ms. A. Huckaby (Ecology) reported that she was presently reviewing Chapter 11 of the Part B permit application. Ms. Huckaby stated that a letter has been sent notifying RL/WHC that Ecology's notice of deficiency (NOD) comments should be received by January 21, 1994. Ms. Huckaby added that she and Mr. Duncan are still coordinating with the waste minimization, Part A, and land disposal restriction aspects of the permit application.

3. COMPLIANCE LETTER FROM MS. L. RUSSELL

Mr. Saueressig and Mr. Duncan noted that they had not received a copy of Ms. L. Russell's (Ecology) compliance letter to RL/WHC dated December 13, 1993 (Attachment 5). Ms. Huckaby provided a copy of the letter to Mr. Saueressig, and stated that Mr. Duncan should be receiving a copy. Ms. Huckaby added that Ms. Russell had written a lengthy inspection report, which will be filed with the administrative record.

Mr. Duncan asked if the compliance letter included a response date. Ms. Huckaby replied that the letter included a certificate of compliance requiring four corrective actions. Ms. Huckaby said that Ms. Russell requested RL/WHC provide the following: completion dates for the four corrective actions, comments and certain initials from RL/WHC, and RL's signature. Mr. Saueressig stated RL/WHC will attempt to provide the responses within 30 days. Ms. Huckaby noted that several of the issues in Ms. Russell's compliance letter will also appear in her NODs.

4. ACTION ITEMS

- Overview on TRU Retrieval Pilot Project

Mr. K. Hladek (WHC) provided a videotape illustrating the pilot retrieval of transuranic (TRU) drums, which was viewed during the meeting. Following the videotape, Mr. Hladek distributed a handout (Attachment 6) which provided further description of the pilot retrieval of Hanford TRU waste.

Ms. Huckaby asked about returning the drums after they have been retrieved and the waste has been removed. Mr. Hladek explained that the empty drums are returned, and the database will reflect the drums as empty and the location of the empty drums.

Ms. Huckaby asked if only the accessible drums from the outside rows are removed, and Mr. Hladek responded that removal of the drums extends back three to four rows.

Ms. Huckaby noted that the videotape did not describe the storage location of the drums at TRUSAF. Mr. Hladek responded by stating that following receipt of the drums, nondestructive assay and nondestructive examination (NDA/NDE) would be performed to confirm the gram quantities of the TRU materials and identify as much as possible any noncompliant items within the drums.

Ms. Huckaby asked in the event that a noncompliant situation were identified, if the drum would be stored at TRUSAF and redesignated at that point. Mr. Hladek concurred. Ms. Huckaby continued by commenting that the discrepancy between the process knowledge and the NDE will be dealt with, and Mr. Hladek acknowledged that was correct. Mr. Hladek indicated that the process knowledge and NDE is evaluated and a decision is made whether it designates as TRU/mixed or TRU waste. Ms. Huckaby expressed an interest in the assumptions or criteria that would be applied to the redesignation, and the difference between the process knowledge and the confirmation. Ms. Huckaby pointed out that those assumptions would be an important aspect of the designation criteria, noting that the designation criteria will drive how the waste is stored at TRUSAF. Mr. Hladek stated that WHC will provide Ms. Huckaby the assumptions and the criteria for the redesignation.

Ms. Huckaby inquired about the parameters of the sampling analysis plan, which will be developed through data quality objective (DQO) workshops. Mr. Hladek explained that the total requirements will be considered, and WHC is beginning to involve the full scale retrieval and the waste receiving process facilities to ensure the data compiled from this group of drums will be applicable in the future. Mr. Hladek added that involvement from the regulators is definitely wanted. Ms. Huckaby asked if there would be a different sampling and analysis plan for dangerous waste and TRU solid waste when designation is performed for the purpose of managing the containers, and Mr. Hladek stated that there would be. Ms. Huckaby continued by asking if a different sampling plan

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would be used for low-level waste. Mr. Hladek explained that if the NDA reflects there is not enough plutonium to designate as a TRU drum, a different sampling plan will not be used since the physical constituents will be considered, not the plutonium. Ms. Huckaby concluded by asking if the sampling and analysis plan objectives would be different depending on whether the waste is TRU, dangerous mixed waste, or TRU dangerous mixed waste, and Mr. Hladek concurred.

Referring to the Phase III characterization of the pilot retrieval, Mr. Hladek stated that the drums will be opened, sorted and analyzed in a glovebox, and then the contents will be placed back in the drum. If the drum is not acceptable, the contents will be placed in another drum. Ms. Huckaby asked if the drums would have to be opened again and then repackaged when they are sent to the WRAP facility, and Mr. Hladek indicated they would. However, Mr. Hladek noted that the project involved 242 drums, which he indicated was not a large amount.

Mr. Duncan asked if the retrieved drums would be staged in preparation for transfer to WRAP. Mr. Hladek stated that the drums will be returned to TRUSAF for storage along with the characterization information from the lab. Mr. Duncan commented that one of the limiting factors for the characterization program is the capacity for TRUSAF to store the drums, and Mr. Hladek concurred. Ms. Huckaby pointed out that 700 drums had been transferred to the Central Waste Complex, resulting in additional storage capacity at TRUSAF. Mr. Hladek noted that some of the drums may be designated as low level, and therefore they could be transferred if there were a capacity issue at TRUSAF. Mr. R. Bowman (WHC) added that a certain level of TRU waste can be handled at the Central Waste Complex.

At the conclusion of the presentation and the following discussion, this action item was closed.

Part A Permit Application Information

Mr. Saueressig stated that WHC was to compare the estimated annual quantities for waste stored with the amounts that have been stored in the past three years, and adjust the Part A permit application as needed. Mr. Saueressig related that Mr. Szelmezcza is in the process of researching waste codes (starting from 1989) in the SWITS database. Ms. Huckaby agreed to keep the action item open until the next Unit Managers Meeting.

Ms. Huckaby added that there were other issues relating to the Part A permit application, and requested a draft version of the Part A permit be provided to Ecology and EPA (Mr. Duncan) to ensure Ecology's and EPA's comments have been incorporated before WHC begins internal review. Mr. Duncan added that WHC could still provide the data on capacity that Ecology has requested.

Mr. Bowman responded that a certain degree of internal review of the Part A permit will be required before a draft can be provided

to the regulators; however, the numbers and the waste codes can be provided without internal review.

~~Letter Documenting Approval by Ecology and EPA Regarding the Certification Form in the Part A Permit Application~~

Mr. Saueressig provided a copy of the letter to Ecology, which closed the action item. Mr. J. Williams (WHC) stated that Ecology wrote a letter on October 1987, requesting that the co-operator sign off, and the letter that Mr. Saueressig was providing to Ecology was WHC's response agreeing to sign as co-operator. Ms. Huckaby asked if the letter is in agreement with the sitewide permit. Mr. Bowman explained that the sitewide permit identifies DOE as the operator and WHC as the co-operator, and also defines the differences in responsibilities.

~~Status of Process Cells Attached to the 224-T TRUSAF per the TPA~~

Mr. Saueressig stated that the process cells are not identified with regard to any milestones in the Tri-Party Agreement (TPA); however, TRUSAF is identified. Mr. Saueressig added that the current plan for the process cells is to remediate them through the D & D work. Ms. Huckaby related that TRUSAF is identified as a treatment, storage and disposal (TSD) facility in the TPA. Ms. Huckaby added that Chapter 11 of the permit application states that the process cells and the rest of the unit will be remediated within the operable unit, and the operable unit is identified. Ms. Huckaby stated that she referred to the TPA and looked at the operable unit and was not able to locate reference to TRUSAF, and she concluded TRUSAF would be identified in the TPA if it were considered at the time. As a result, Ms. Huckaby maintained that the process cells are part of TRUSAF. WHC and Ecology agreed to close the action item and defer the issue as a NOD.

At this point Mr. Bowman stated that RL/WHC would like to initiate discussions with Ecology regarding discrepancies Ecology perceives within the Part B permit between the activities RL/WHC report are occurring and the activities that are actually taking place. Ms. Huckaby responded that she would be addressing most of the issues through NOD comments. Ms. Huckaby indicated some of the problems include a tremendous lack of detail in the Part B permit application, and operators not using definitions at the operable unit that are in the permit. Ms. Huckaby added that she observed a different approach every time she had visited the facility.

RL/WHC, Ecology and EPA scheduled a teleconference for January 5, 1994, at 1:30 p.m. to discuss the discrepancies in the Part B.

5. Set Next Meeting Date

The next Unit Managers Meeting was scheduled for videoconference on January 27, 1993, at 9:30 a.m.

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Attachment 4

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

December 16, 1993
9:00 a.m. - 10:30 a.m.

Action Items

Action Item #

Description

11-4-93:1

WHC will provide an overview of the TRU retrieval pilot project at the next Unit Managers Meeting.
Action: R. Szelmezcza (WHC)

CLOSED

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.
Action: J. Williams Jr. (WHC)

OPEN

11-4-93:3

WHC will provide the letter documenting approval by Ecology and the EPA for the certification form used for the Part A permit application.
Action: J. Williams Jr. (WHC)

CLOSED

11-4-93:4

WHC will determine the status per the TPA of the process cells at TRUSAF and provide the information at the Unit Managers Meeting.
Action: R. Bowman (WHC)

CLOSED

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Attachment 5

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

December 16, 1993
9:00 a.m. - 10:30 a.m.

~~COPY OF COMPLIANCE LETTER FROM ECOLOGY DATED 12-13-93~~

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STATE OF WASHINGTON

DEPARTMENT OF ECOLOGY

7601 W. Clearwater, Suite 102 • Kennewick, Washington 99336 • (509) 546-2990

December 13, 1993

Mr. John Wagoner, Manager
U.S. Department of Energy
P.O. Box 550
Richland, WA 99352

Mr. Tom Anderson, President
Westinghouse Hanford Company
P.O. Box 1970
Richland, WA 99352

Dear Messrs. Wagoner and Anderson:

Re: Violations at 224-T Transuranic Waste Storage and Assay Facility

Thank you for the assistance of United States Department of Energy (USDOE) and Westinghouse Hanford Company (WHC) personnel during the Washington State Department of Ecology's (Ecology) November 18 and 22, 1993, inspections at the Transuranic Waste Storage and Assay Facility (TRUSAF). The inspection was conducted to determine compliance with interim status requirements under Chapter 173-303 Washington Administration Code (WAC) for hazardous and/or mixed waste, and to status current activities with respect to the Dangerous Waste Part B Permit Application.

A problem discovered during the inspection at TRUSAF is with management of waste once the real-time radiography (RTR) process detects a suspect or confirmed dangerous waste within a container. For example, lead lined gloves have been found in many containers. Some containers were designated as radioactive mixed waste based on the lead (D008), others were not. All solid waste must go through the designation process (WAC 173-303-070). There are no provisions in the Dangerous Waste Regulations for classifying a waste as "suspect." Waste is either solid waste or dangerous waste. Many containers at TRUSAF have been in a "suspect" status for many years with no progress made towards determining its dangerous waste status.

TRUSAF is unique as a treatment, storage, and disposal facility in that many of the containers received are not designated as dangerous waste. However, once USDOE/WHC determines that a dangerous waste component exists, steps must be taken to verify the new knowledge by having the waste properly designated. In the case of TRUSAF, containers have been identified as containing materials that designate as dangerous waste. Such containers must be managed as dangerous waste once such

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knowledge is gained. Although the problem at TRUSAF may stem from inaccurate or incomplete designation on the part of the generator, this particular inspection focused specifically on TRUSAF as a waste storage facility.

The following is a summary of violations and additional concerns resulting from Ecology's TRUSAF inspection.

SUMMARY OF VIOLATIONS

As discussed after the inspection, there were several areas of noncompliance with the Washington State Dangerous Waste Regulations (Chapter 173-303 WAC) which need to be resolved.

WAC 173-303-400 Interim status facility standards. (3)(a) Interim status standards shall be standards set forth by the Environmental Protection Agency in 40 CFR 265 Subparts F through R . . . and: (i) . . . the facility requirements of WAC 173-303-280 through 173-303-440; (ii) WAC 173-303-630(3) for containers. In addition, for container storage, the department may require that the storage area include secondary containment in accordance with WAC 173-303-630(7) Any new container storage areas constructed or installed after September 30, 1986, must comply with the provisions of WAC 173-303-630(7).

- 1) **WAC 173-303-350 Contingency plan and emergency procedures.**
Failure to maintain emergency equipment required under WAC 173-303-350(3)(e) in accordance with the facility contingency/emergency plan

Emergency equipment was not maintained at TRUSAF in accordance with the facility emergency/contingency plan, document #WHC-IP-0263-224T, Section 5.2. The following emergency items identified as required by the plan were not found within the TRUSAF facility during the November 22, 1993, inspection: Hand-operated rotary pump, face shields, rubber coveralls, non-sparking shovels, radiation rope, respirators, and contaminated surface signs. TRUSAF representatives have made efforts to acquire missing equipment and are reviewing the need for revising the plan.

- 2) **WAC 173-303-380 Facility recordkeeping.**
Failure to maintain operating records in a manner sufficient to locate wastes within the facility per WAC 173-303-380(1)(b)

Container records are filed based on date received, not Package Identification Number. In order to locate a specific container file, one must first locate the drum within the facility, review the attached paperwork for date received, then backtrack to the container file. In other words, one has no means of locating a specific container

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file within TRUSAF unless the date received is first known. Once drums are received at TRUSAF, there is no system in place to report the location of each dangerous waste within the facility. Ecology selected three containers at random for container record review. One of the three records selected could not be found in the record file: Drum #RHZ-213-A21768, a mixed waste drum located on the third floor.

3) **WAC 173-303-630 Use and management of containers.**

Failure to label containers with hazardous waste labels and/or in a manner which adequately identifies the major risk(s) associated with the contents of the containers per WAC 173-303-630(3)

Failure to store containers within a compliant secondary containment system per WAC 173-303-630(7)

Wastes originally shipped to TRUSAF as strictly radioactive, then, through the RTR process, discovered to contain a suspect and/or confirmed dangerous waste component (e.g., lead lined gloves, paint, free liquids, etc.) were not managed as radioactive mixed waste (e.g., hazardous waste labels were not applied, major risks were not identified, secondary containment was not provided, etc). (Drum #RHZ-212-A19448 and enclosure 1)

Many dangerous waste containers containing free liquids were not stored within a compliant secondary containment system. (Drums #BL-0919-00-MAP, #BL-0852-00-MAP, #RHZ-213-A21723, #HRO-92-0000204, and enclosure 1) TRUSAF representatives informed me that they intend on completing efforts aimed at satisfying secondary containment requirements within two months by application of a floor sealant.

SUMMARY OF CONCERNS

- 1) Secondary containment was not provided for three incoming containers (Drums #RHZ-212-A22794, #RHZ-212-A22795, and #RHZ-212-A22796) prior to confirming the absence of free liquids, per section 4.1.1.3. of the Part B permit application.
- 2) The building/emergency plan (WHC-IP-0263-224T) does not address procedures for responding to spills and/or retrieving spilled material within the TRUSAF elevator area. Also, Section 5.4.2 of the building emergency/contingency plan states the emergency equipment provided is to be used for *nonradioactive* hazardous material spills. The waste at TRUSAF is exclusively radioactive and radioactive mixed.

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- 3) Similar violations to those Ecology cited have been noted on internal WHC audit reports. (Reference: Audit #93RCW-162, performed October 27, 1993; Audit #IAA-93-0009, performed September 1, 1993, WHC Environmental Compliance Assurance; Assessment #SWA-93-0015, performed March 23-35, 1993)
 - 4) Some of the containers on the third floor, stacked two high, had no visible documentation attached. The TRUSAF operator stated that the top drums had been stacked on top of the paperwork for the bottom drums, making the documentation inaccessible.
 - 5) Drums located in the north end of the first floor were being stored in blocks of five to six drums wide and deep. The TRUSAF operator stated that there are containers in the area that contain lead and/or free liquids. No violations were noted in this area; however, Ecology inspectors were unable to inspect the containers and attached documentation due to inaccessibility.

In order to correct the identified violations of Chapter 173-303 WAC, please complete the following corrective actions within the timeframes specified. Please be advised that failure to correct these noncompliant items may result in the issuance of an administrative order and/or penalty under RCW 70.105.080 and/or .095 (Hazardous Waste Management).

This voluntary compliance letter is being issued pursuant to the authorities granted to Ecology by RCW 70.105 (Hazardous Waste Management).

CORRECTIVE ACTION #1

Within thirty (30) days of receipt of this letter, USDOE and WHC must acquire and maintain the emergency equipment required by WAC 173-303-350(3)(e) in accordance with the TRUSAF facility emergency/contingency plan (WHC-IP-0263-224T).

CORRECTIVE ACTION #2

Within thirty (30) days of receipt of this letter, USDOE and WHC must begin maintaining the operating record in a manner sufficient to locate wastes within the facility per WAC 173-303-380(1)(b). For example, the Solid Waste Information Tracking System (SWITS) could be used to document the location of each dangerous waste within the facility and the quantity at each location.

CORRECTIVE ACTION #3

Within ninety (90) days of receipt of this letter, USDOE and WHC shall determine the dangerous waste status of all containers stored at TRUSAF. For all properly designated waste, no action is required. For improperly or incompletely designated waste, accurate designation must be performed. USDOE and WHC shall label all dangerous waste and

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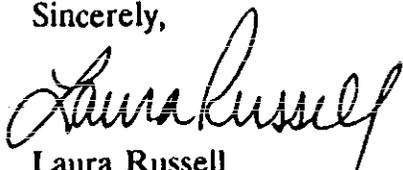
radioactive mixed waste with dangerous waste labels and in a manner which adequately identifies the major risk(s) associated with the contents of the containers per WAC 173-303-630(3).

CORRECTIVE ACTION #4

Within ninety (90) days of receipt of this letter, USDOE and WHC shall store all dangerous waste containers containing free liquids within a compliant secondary containment system per WAC 173-303-630(7).

Please do not hesitate to call me at (509) 736-3024 or Alisa Huckaby, TRUSAF Unit Manager, at (509) 736-3034 should you have any questions or require clarification on any of the items in this compliance letter or the enclosed "Certificate of Compliance." Please complete and submit the enclosed "Certification of Compliance" to this Department by March 18, 1994 (enclosure 2).

Sincerely,



Laura Russell
RCRA Compliance Inspector
Nuclear and Mixed Waste Management Program

LER:sr
Enclosures (2)

cc: Keith Kline, USDOE
Mike Aichele, WHC
Paul Hapke, WHC
Matt LaBarge, WHC
Jeff Pratt, WHC
Roger Szelmeczka, WHC
Dan Duncan, EPA
Administrative Record

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Please complete and return this form to Laura Russell, Washington State Department of Ecology, 7601 West Clearwater #102, Kennewick, Washington 99336, by March 18, 1994.

CERTIFICATE OF COMPLIANCE

As a legal representative of the U.S. Department of Energy, I certify to the best of my knowledge, the completion of items requested by the Washington State Department of Ecology on December 13, 1993, with regard to the inspection of the 244-T Transuranic Waste Storage and Assay Facility (TRUSAF), located on the Hanford Reservation, 200 West Area, Facility ID Number WA7890008967 as shown below.

COMPLIANCE STATUS

(A facility representative shall list the completion date and initial for each item.)

CORRECTIVE ACTION	DATE DUE	DATE COMPLETED	INITIALS	COMMENTS
#1	1/13/94			
#2	1/13/94			
#3	3/14/94			
#4	3/14/94			

Signature of DOE-RL Representative

Date

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TRUSAF FACILITY INSPECTION
 SUMMARY OF CONTAINER VIOLATIONS FOUND ON THE THIRD FLOOR
 ENCLOSURE 1

THIRD-FLOOR:

DRUM NUMBER	LOCATION/SIGN	COMMENTS/VIOLATIONS
BP-189007	PNL-ALMOST CERT. HOLD/RETURN - OMW	HW Label: D008, WTO1 Markings: OMW, MW-EHW No major risks on drum
BP-89011	"	HW Label: D006, D008, D009, WTO1, WC02 Markings: OMW, TRU Waste No major risks on drum
PNL-188013	"	HW Label: WC01, D006, WTO2 Markings: TRU No major risks on drum
PNL-188005	"	HW Label: D008, WTO1 Markings: TRU No major risks on drum
RHZ-103-A15486	SUSPECT NON-MIXED RETURN TO GENERATOR	Lead gloves identified on paperwork No HW label on drum No major risks on drum
RHZ-102-A15110	"	Lead gloves and free liquids identified on paperwork No HW label on drum No major risks on drum No secondary containment
RHZ-102-A14967	"	Lead gloves identified on paperwork No HW label on drum No major risks on drum
RHZ-102-A15270	"	Lead gloves identified on paperwork No HW label on drum No major risks on drum

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RHZ-102-A15389	"	Lead gloves identified on paperwork No HW label on drum No major risks on drum
RHZ-241-A19347	"	Mercury thermometer identified on paperwork No HW label on drum No major risks on drum
RHZ-103-A15028	"	Lead gloves identified on paperwork No HW label on drum No major risks on drum
RHZ-213-A17573	"	Lead gloves identified on paperwork No HW label on drum No major risks on drum
RHZ-103-A14985	"	Lead gloves and free liquids identified on paperwork No HW label on drum No major risks on drum No secondary containment
RHZ-102-A15488	"	Lead gloves identified on paperwork No HW label on drum No major risks on drum
RHZ-102-A14836	"	Lead gloves identified on paperwork No HW label on drum No major risks on drum
RHZ-102-A15266	"	Lead gloves and free liquids identified on paperwork No HW label on drum No major risks on drum No secondary containment
RHX-103-A14857	"	Lead gloves identified on paperwork No HW label on drum No major risks on drum

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RHZ-111-A15633	"	Lead gloves identified on paperwork No HW label on drum No major risks on drum
RHZ-212-A18517	RETURN TO GENERATOR OMW (Note: The 8 containers located under this sign in the morning were placed on portable secondary containment systems during our lunch break)	HW Label: WT01, WP01, WC01 Markings: Liquid Organic Waste, RMW-EHW, OMW No major risks on drum No secondary containment
RH-A-87-067	"	Paint identified on paperwork Markings: "Need label" No HW label on drum No major risks on drum
RHZ-212-A18446	"	Free liquids identified on paperwork HW Label: WC01, WP-1, WT01 Markings: EHW No major risks on drum No secondary containment
RHZ-212-A19731	"	Free liquids identified on paperwork HW Label: WT01, WC01, WP01 Markings: Liquid Organic Waste, RMW-EHW, FP > 200F, OMW No major risks on drum No secondary containment
RH-A-85-071 (TRU only)	"	Free liquids identified on paperwork No secondary containment

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RHZ-212-A18496	"	Free liquids identified on paperwork HW Label: WT01, WC01, WP01 Markings: Liquid Organic Waste, RMW-EHW, FP > 200F, OMW No major risks on drum No secondary containment
RHZ-212-A18497	"	Free liquids identified on paperwork HW Label: WT01, WC01, WP01 Markings: Liquid Organic Waste, RMW-EHW, FP > 200F No major risks on drum No secondary containment
RHZ-213-A21768	"	Free liquids identified on paperwork HW Label: WC02, D007, WT01, D008, D002, D009, EHW Markings: RMW-EHW, TCLP Toxic No secondary containment
RH-A-87-060	HOLD-CANNOT PENETRATE-OMW	Free liquids identified on paperwork HW Label: D008 No major risks on drum No secondary containment
RHZ-212-A19715	"	Lead gloves, D008, WT01 identified on paperwork HW Label: incomplete No major risks on drum
RH-A-87-027	"	HW Label: D008 Markings: MW-DW, OMW No major risks on drum
RH-A-88-009	"	HW Label: D008 Markings: MW-DW, OMW No major risks on drum

RHZ-212-19446	"	HW Label: D008, WTO1, EHW Markings: RMW-EHW, OMW No major risks on drum
RH-A-90-022	"	HW Label: D008 Markings: RMW-DW, OMW No major risks on drum
RH-A-90-002	"	HW Label: D008 Markings: RMW-DW, OMW No major risks on drum
RH-A-91-001	"	HW Label: D008 Markings: RMW-DW, ORM-E No major risks on drum
RHZ-212-A19931	"	HW Label: D008, WT01 Markings: RMW-EHW, OMW No major risks on drum
RH-A-88-006	"	HW Label: D008 Markings: "Corrosive label?" MW-DW No major risks on drum
RHZ-212-A19135	"	HW Label: D008, WT01 Markings: RMW-EHW, OMW No major risks on drum
RH-A-88-023	"	HW Label: D008 Markings: OMW No major risks on drum
RHZ-213-A19574	"	HW Label: D008, WTO1, EHW Markings: RMW-EHW, OMW No major risks on drum
RH-A-87-026	"	HW Label: D008 Markings: MW-DW, OMW No major risks on drum
RHZ-212-A19296	"	HW Label: D008, WT01, EHW Markings: RMW-EHW, OMW No major risks on drum

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RHZ-212-A17094	SUSPECT NON-MIXED RETURN TO GENERATOR	Free liquids identified on paperwork No secondary containment No major risks
RHZ-212-A17986	"	Free liquids identified on paperwork No secondary containment No major risks
RHZ-212-A17453	"	Free liquids identified on paperwork No secondary containment No major risks
RHZ-212-A17257	"	Lead identified on paperwork No major risks
RHZ-212A-17275	"	Lead identified on paperwork No major risks
RHZ-220-A16369	"	Lead identified on paperwork No major risks
RHZ-213-A17407	"	Lead identified on paperwork No major risks
RHZ-212-A17393	"	Lead identified on paperwork No major risks
RHZ-212-A17049	"	Lead identified on paperwork No major risks
RHZ-212-A17087	"	Lead identified on paperwork No major risks
RHZ-213-A17470	"	Lead identified on paperwork No major risks
RHZ-213-A17486	"	Lead identified on paperwork No major risks
RHZ-213-A21917	"	Lead identified on paperwork No major risks
RHZ-102-A14837	"	Lead identified on paperwork No major risks

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RHZ-212-A20498	"	Lead identified on paperwork No major risks
RHZ-103-A15485	"	Lead identified on paperwork No major risks
RHZ-102-A14799	"	Free liquid and lead identified on paperwork No major risks No secondary containment
RHZ-103-A14541	"	Lead identified on paperwork No major risks
RHZ-102-A14800	"	Lead identified on paperwork No major risks
RHZ-105-A14862	"	Lead identified on paperwork No major risks
RHZ-103-A14318	"	Free liquid and lead identified on paperwork No major risks No secondary containment
RHZ-102-A14053	"	Lead identified on paperwork No major risks
RHZ-102-A14968	"	Free liquid and lead identified on paperwork No major risks No secondary containment
RHZ-103-A15015	"	Lead identified on paperwork No major risks
RHZ-103-A15025	"	Lead identified on paperwork No major risks
RHZ-103-A15013	"	Lead identified on paperwork No major risks
RHZ-213-A17471	"	Lead identified on paperwork No major risks

9180-641216

RHZ-103-A15278	"	Free liquid and lead identified on paperwork No major risks No secondary containment
RHZ-213-A17568	"	Lead identified on paperwork No major risks
RHZ-212-A19567	HOLD-CANNOT PENETRATE	Lead identified on paperwork No major risks
RHZ-212-A19845	"	Lead identified on paperwork No major risks
RHZ-212-A21030	"	Lead identified on paperwork No major risks
RHZ-212-A20576	"	Lead identified on paperwork No major risks
RHA-88021	"	Lead identified on paperwork No major risks
RHA-88004	"	Lead identified on paperwork No major risks
RHZ-220-A20834	"	Lead identified on paperwork No major risks
RHA-89004	"	Lead identified on paperwork No major risks
RHZ-212-A20499	"	Documentation not visible
RHZ-212-A19843	"	Documentation not visible
RHZ-212-A21410	"	Documentation not visible
RHZ-212-A18445	"	Documentation not visible
RH-A89007	CAUSTIC-RETURN TO GENERATOR	Free liquid identified on paperwork No major risks No secondary containment

RH-A87032	"	Free liquid identified on paperwork No major risks No secondary containment
RH-A87047	"	Free liquid identified on paperwork No major risks No secondary containment
RH-A87050	"	Free liquid identified on paperwork No major risks No secondary containment
RH-A87051	"	Free liquid identified on paperwork No major risks No secondary containment
RH-A88022	"	Free liquid identified on paperwork No major risks No secondary containment
RH-A87062	"	Free liquid identified on paperwork No major risks No secondary containment

9413149-0048

Attachment 6

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

December 16, 1993
9:00 a.m. - 10:30 a.m.

PILOT RETRIEVAL OF HANFORD TRANSURANIC WASTE

4007 5118 116

HANFORD TRANSURANIC WASTE

PILOT RETRIEVAL OF

PROGRAM DESCRIPTION

Phase I - Existing Records and Data Study

- **Completed (1991) - documented in WHC-EP-0225, "Contact-Handled Transuranic Waste Characterization Based on Existing Records"**

Phase II - Retrieval and Noninvasive Characterization

- **Vented Drums - retrieve 138 vented drums**
- **Unvented Drums - retrieve 104 unvented drums**

Phase III - Detailed Characterization

- **Open, sort, and sample vented and unvented drums**

Phase II Status

- **Operational Readiness Review (ORR) completed January 28, 1993.**
- **Presentation to Washington State Departments of Health and Ecology May 1993**
- **WHC start-up authorization letter sent to DOE/RL August 26, 1993**

Phase II Near-Term Activities

- **DOE/RL Operational Readiness Evaluation (ORE)**
- **Preparation and Site Setup**
- **Vented drum retrieval begins 3/94, 13 week duration (dependent on ORE)**

Phase III Status

- **Facility selection Value Engineering Study - May 17-21 1993**
 - ▶ **3 Facilities** were chosen for further study
- **WHC is in negotiations with Battelle for use of the 325 building glovebox (expected by end of calendar year)**

Phase III Near-Term Activities

- **Data Quality Objective (DQO) workshop for completing Sampling Analysis Plan**
- **Phase III facility/glovebox modification evaluation**

RETRIEVAL SELECTION CRITERIA

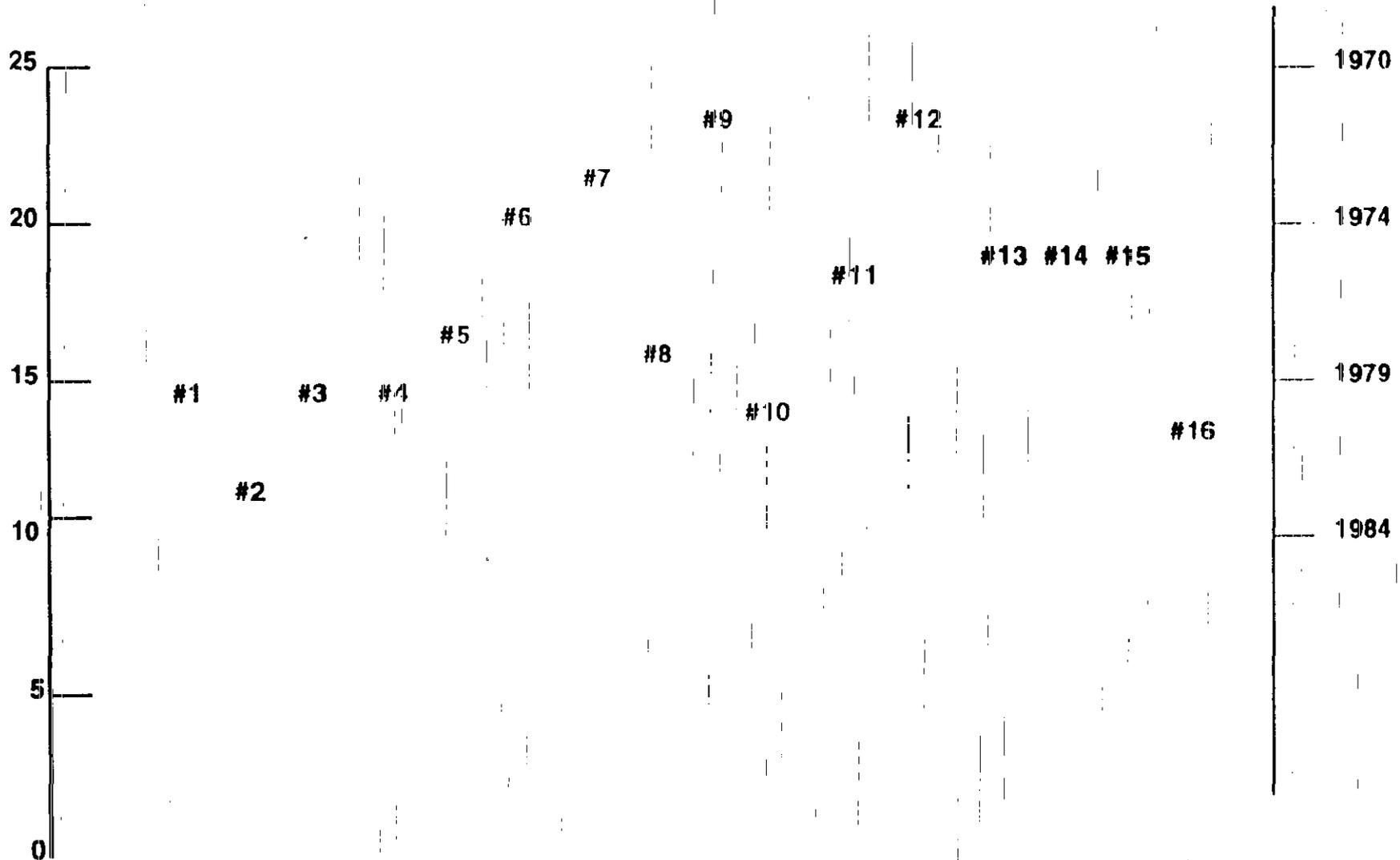
- **Generators**
- **Weight Ranges**
- **Storage Configurations**
- **Tru Content**
- **Storage Time**
- **Records Information**

DRUM STORAGE LENGTH

(BY RETRIEVAL SITE NUMBER, AS OF 1994)

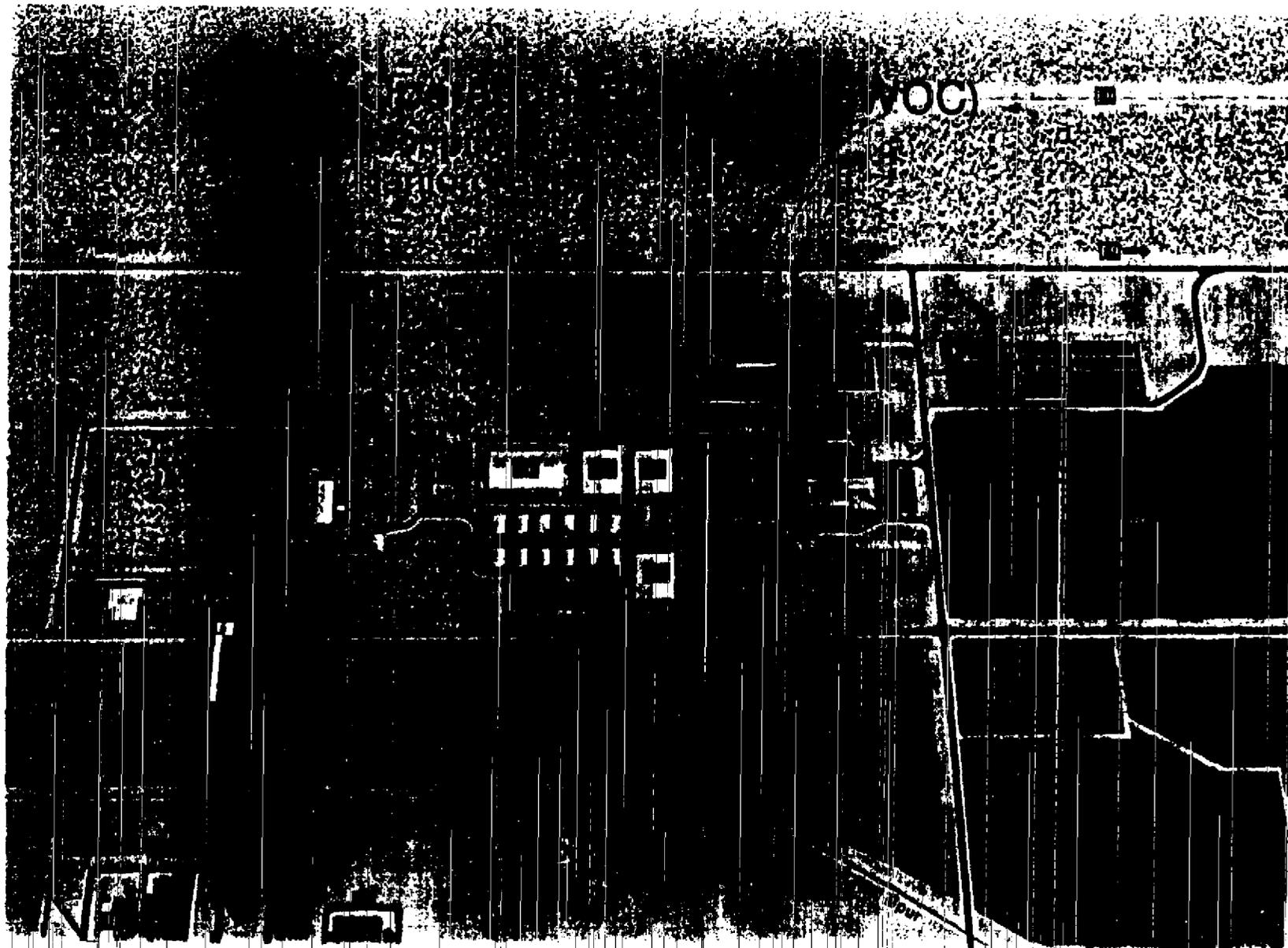
YEARS IN STORAGE

YEAR PLACED IN STORAGE



Vented Drum Sampling Sites

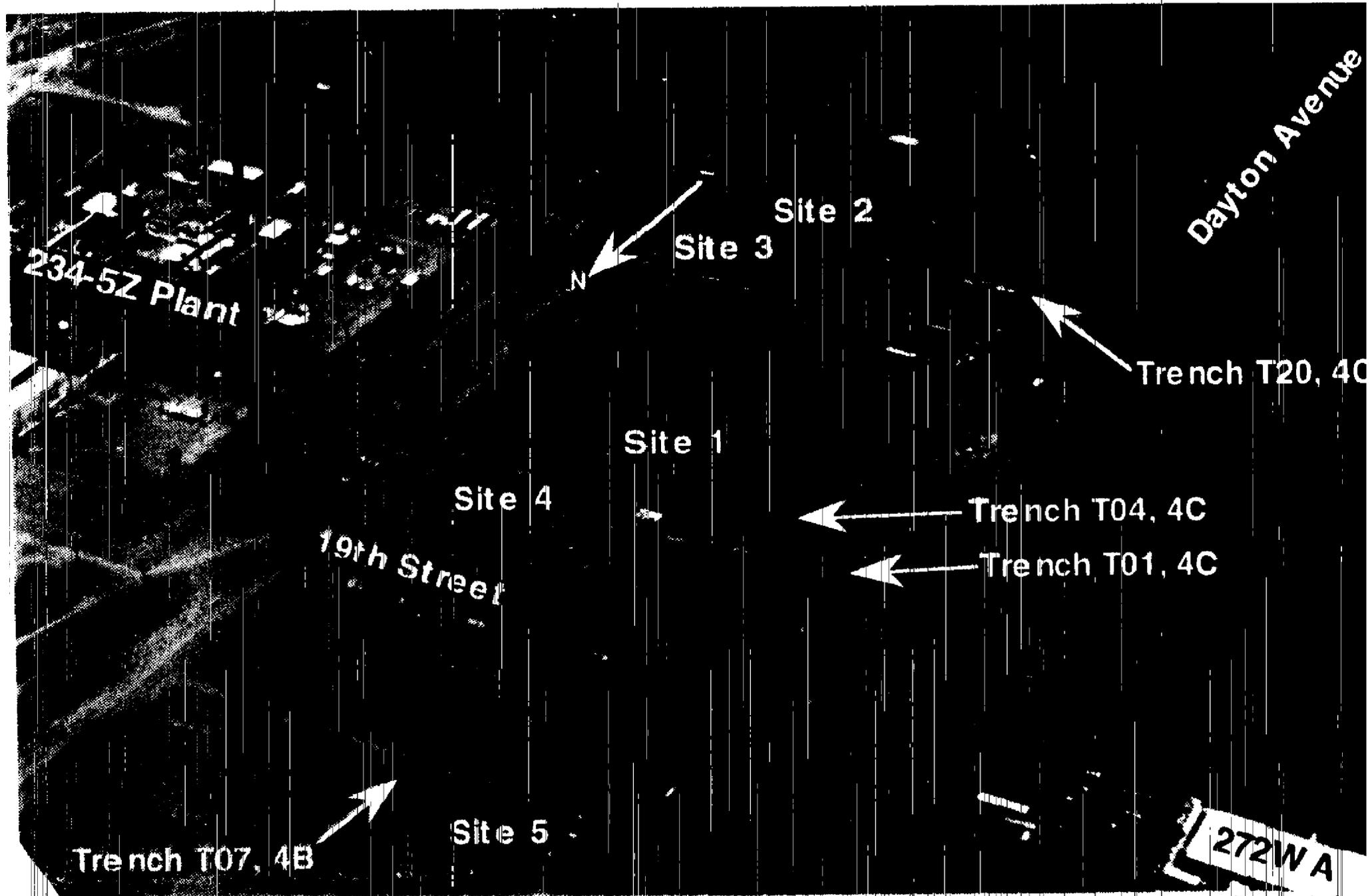
Site No.	Trench	Coordinate	Year Of Emplacement	Number To Be Retrieved	Minimum Number of Containers Inspected In Situ	Reason for Selection
1	218-W-4CT-04	77694-77668	80	64	84	Intermediate time exposure in Configuration 4; unique storage condition (flooding)
2	218-W-4CT-20	77578-77548	83	16	46	Short time exposure in Configuration 4; off site generator, galvanized steel
3	218-W-4CT-20	77466-77452	80 (received) 82 (covered)	5	50	Two year storage prior to cover and short time exposure in Configuration 4; Exxon generator
4	218-W-4CT-01	77533-77557	80	5	50	2 to 3 yr storage prior to covered and intermediate time exposure in Configuration 4; Z-9 Trench waste generator
5	218-W-4BT-07	77978-77953	77	48	58	Intermediate time exposure in Configuration 4



- Project W 202 (Capital Work Order)
- AT Capital Work Order
- Project W 205 (Expense Funded)
- BT Budget on Asset Waste (Capital) (218 W 205)
- Project W 206 (94 LI)
- CT Waste Recycling and Storage
- Project W 100 (94 LI)
- + DT Waste Recycling
- Project W 112 (94 LI)
- + ET Long Term Diesel Storage
- + FT Ignition Diesel Storage
- + GT Bay Storage
- + HT Transfer Diesel
- + IT Shipping and Receiving
- + JT Auxiliary Diesel Storage
- + KT Heating Diesel Storage
- + LT Diesel Storage
- + MT New Diesel Storage
- + NT Infrastructure
- Project W 113 (94 LI)
- + OT Diesel Waste Recycling
- + PT Infrastructure
- Project W 155 (92 LI)
- QT Application
- Project W 174 (EOP)
- RT Diesel Waste Recycling
- Project W 219 (Expense Funded)
- ST Diesel Waste Recycling
- Project W 221 (97 LI)
- OT Diesel Waste Recycling
- Project W 241 (94 GFD)
- KT Diesel Waste Recycling
- Project W 242 (97 LI)
- LT Diesel Treated Facility
- Project W 247 (97 LI)
- MT Diesel Waste Recycling
- Project W 255 (97 LI)
- NT Diesel Waste Recycling
- Existing Facilities
- 01 P20 WA
- 02 Diesel Waste Recycling
- 03 Diesel Waste Recycling
- 04 Diesel Waste Recycling
- 05 Diesel Waste Recycling
- 06 Diesel Waste Recycling
- 07 Diesel Waste Recycling
- LI - Line Item
- GFD - General Fund
- 100 - To Be Returned
- LI 90 - Low
- CWC - Cost
- 9000 - Sold
- Cost

1580-6H10116

TRU Retrieval Sites, 200 West Area



SCHEDULE AND INTERFACES

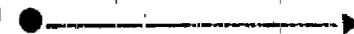
1988 1990 1992 1994 1996 1998 2000 2002

Phase I (Records Study) Phase II (Retrieval and NDE) Phase III (Contents Examination)

Pilot Retrieval



Full Scale Retrieval



Waste Receiving and Processing Facility
WRAP Module 1, Project W-02(5)

Construction Operation



Phase III - Characterization

- **Open, Sort, and analyze waste drum contents in fiscal year 1995**
- **Compare actual drum contents to existing records and Real-Time Radiography (RTR)**
- **Perform NDA on selected drum contents for verification**

Distribution:

1990-04-15 08:54

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C. E. Clark	RL	A5-15
D. L. Duncan	EPA	HW-106
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R. M. Gordon	RL	R3-80
K. L. Hladek	WHC	N3-13
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D. W. Lloyd	MACTEC	B1-42
P. J. Mackey	WHC	B3-15
M. M. McCarthy	WHC	N3-13
K. M. McDonald	WHC	T4-03
R. D. Pierce	WHC	T3-04
D. B. Powell	WHC	T4-03
S. M. Price	WHC	H6-23
R. J. Roberts	WHC	N3-13
D. G. Saueressig	WHC	H6-24
N. M. Shoemaker	WHC	T4-04
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H. T. Tilden II	PNL	P7-68

ADMINISTRATIVE RECORD: 224-T Transuranic Waste Storage and Assay Facility,
S-2-2 [Care of EPIC, WHC (H6-08)]

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

Environmental Protection Agency Region 10, Seattle, Washington 98101, Mail
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Please send comments on distribution list to K. E. Knox, WHC H6-24,
(509) 372-3596