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Meeting Minutes Transmittal - Approved

Unit Managers Meeting
4843 ALKALI METAL STORAGE FACILITY
740 STVCN, RM 1320
Richland, Washington

Meeting Held November 10, 1993
From 3:00 pm to 4:30 pm

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: 12-14-93
Randall N. Krekel, Unit Manager, RL

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

Alisa D. Huckaby Date: 12/14/93
Alisa D. Huckaby, Unit Manager, Washington State Department of Ecology

4843 Alkali Metals Storage Facility, WHC Concurrence

Fred A. Ruck III Date: 12/14/93
Fred A. Ruck III, Contractor Representative, WHC

Not present. Date: _____
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



11/20/1608146

Attachment 1

Unit Managers Meeting
4843 ALKALI METAL STORAGE FACILITY
740 STVCN, RM 1320
Richland, Washington

Meeting Held November 10, 1993
From 3:00 pm to 4:30 pm

Agenda

1. Approval of Past UMM Minutes
2. Status Action Items
 - 7/14/93:1
 - 7/14/93:2
3. Status Closure Activities
 - Status of NOD comments
 - Status of Ecology Review of NOD Comments
 - Inclusion of the Radiation Survey in the Closure Plan
4. New Business
 - Update on Waste Status at 4843 AMSF
 - Question on Comment No. 4
 - Question on Comment No. 5
5. Set Next Meeting Date

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Attachment 2

Unit Managers Meeting
4843 ALKALI METAL STORAGE FACILITY
740 STVCN, RM 1320
Richland, Washington

Meeting Held November 10, 1993
From 3:00 pm to 4:30 pm

Summary of Discussion and Commitments/Agreements

1. Approval of Past UMM Minutes

The October 12, 1993 meeting minutes were reviewed and approved.

2. Status Action Items

- 7-14-93:1 Pending; awaiting removal of waste from 4843 AMSF and scheduling of the survey.
- 7-14-93:2 Pending; awaiting removal of waste from 4843 AMSF and scheduling of the survey.

3. Status Closure Activities

- Status of NOD comments

RL (R. N. Krekel)/WHC (J. G. Adler) stated that the Notice of Deficiency (NOD) Response Table had been completed, signed, and transmitted to Ecology on November 4, 1993.

- Status of Ecology Review of NOD Comments

Ecology (A. D. Huckaby) stated that the NOD Response Table had been received. Ecology asked about the schedule for responding to this set of NODs. RL (R. N. Krekel)/WHC (F. A. Ruck III) responded:

Per the schedule in the TPA, Ecology has 90 days from when Ecology received the NOD Response Table (dated October 14, 1993) to either accept or respond to the remaining open NOD comments.

After Ecology prepares their responses, there are 60 days allocated by the TPA for Unit Manager's Issue Resolution. (This would nominally start at the February UMM.) At this point Ecology, RL and WHC meet to resolve the remaining open NOD comments. If 60 days and one meeting per month is not sufficient to resolve all comments, the RL and Ecology Unit Mangers can agree to extend the time and/or hold additional meetings.

Revision of the closure plan would start when the RL and Ecology Unit Mangers agree that the remaining open issues have been sufficiently resolved. Note that the revision could start even if

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there are still open NOD comments, provided that the RL and Ecology Unit Managers agree to proceed.

- Inclusion of the Radiation Survey in the Closure Plan

Ecology (A. D. Huckaby) discussed with RL (R. N. Krekel)/WHC (F. A. Ruck III, J. G. Adler) the radiation survey that is planned for the 4843 AMSF after the waste is removed.

RL/WHC indicated that one of their major assumptions is that the survey will not indicate any radioactive contamination in the 4843 AMSF. The primary reasons for this assumption are the date when waste was first stored in a building that was previously not contaminated (1986), the nature of the waste (spontaneously combustible alkali metal), and the method of storage (sealed containers). All of these factors should mitigate against radioactive contamination being spread from the waste into the surfaces of 4843 AMSF. At this time, there are no known areas of fixed or smearable radioactive contamination in the 4843 AMSF.

Ecology (A. D. Huckaby) asked how the radiation survey result could be included in the closure plan. WHC (F. A. Ruck) stated that this information could be included as an appendix to the closure plan. It might be either a supplement to the dangerous waste sampling and analysis appendix or as a separate appendix.

Ecology (A. D. Huckaby) asked about the scope and scheduling of the radiation survey: Will the survey cover just the radiation zone or all of the building? When will this be taking place?

WHC (J. G. Adler/F. A. Ruck III) responded: The radiation survey will cover both the radiation zone that contains the waste and the interior of the building. The survey cannot occur until all of the waste is removed. With the need to order the additional shipping box (see 4. New Business - Update on Waste Status for additional information) at 4843 AMSF, the last of the waste will probably not be removed until January 1994. Then the survey will need to be added to the work scheduled at FFTF. The best estimate for when the radiation survey will occur is probably between February and April 1994. Copies of the procedures used in the survey will be provided to Ecology. The WHC personnel at FFTF are working to get the appropriate procedures for surveying the building together and cleared.

Ecology asked about how radioactive contamination, if found, would be marked? Also, how would it be cleaned up? WHC speculated (FFTF has not yet provide copies of the procedure(s)) that radioactive contamination would be either marked physically or on a grid system. Cleanup of major fixed radioactive contamination would be done by WHC Decommissioning and Decontamination (D & D). This would occur concurrently with decontamination of any dangerous waste contamination. This type of combined cleanup would address both radiological and RCRA cleanup/decontamination concerns. (See also supplemental information below.)

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The location of any radioactive contamination will be recorded to support the decontamination of the facility for the dangerous waste. RL/WHC agrees to use the location of any radiological contamination in developing the sampling plan for the 4843 AMSF. The RL/WHC position is that since radioactive concerns are not regulated by WAC 173-303, we (RL/WHC) will determine the scope and extent of the radiological information to be included in the closure plan. It is understood that Ecology does not necessarily agree on the requirements for including radiological information in the closure plan.

There was some additional discussion between Ecology and RL/WHC on how the survey, sampling plan, and decommission work plan information would be included in either the administrative record or in the closure plan itself.

4. New Business

- Update on Waste Status at 4843 AMSF

RL (R. N. Krekel)/WHC (F. A. Ruck III) provided an update on the status of the waste containers at the 4843 AMSF. The paper work to remove all waste containers (except for one bulky item) has been completed. The one large, bulky item will require a special shipping box. This shipping box is on order. All the waste except the one bulky item will be shipped out as soon as possible.

- Question on Comment No. 4

Ecology (A. D. Huckaby) requested clarification on the RL/WHC response to Notice of Deficiency (NOD) Response Table Comment No. 4. Specifically, in the response, RL/WHC states that the oil is not a waste per WAC 173-303-070(a). Ecology's question is: if it is not a waste, then what is it?

WHC (J. G. Adler) responded as follows: The oil does not meet the WAC 173-303-070(2) criteria. Specifically, the oil was not generated as part of the operation of the 4843 AMSF. The oil is a non-regulated solid waste generated concurrently with the generation of the alkali metal dangerous waste. Both waste were generated as the result of a spill that occurred in FFTF. Upon packaging, the oil remained as an oily film upon the pieces of alkali metal.

The function of the oil was to prevent a metal fire from occurring by blocking moisture in the air from reaching the spilled alkali metal. As such, RL/WHC does not consider the oil to be a regulated dangerous waste or a constituent of concern. The oil is a non-regulated waste that is part of the overall waste matrix, exactly like a piece of pipe covered with alkali metal is non-regulated waste component in the overall waste matrix.

Ecology stated they disagree with the RL/WHC position. Ecology feels that the oil stains on the floor of the 4843 AMSF may be a concern and

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intends to use the oil in the waste as a means for sampling any oil stains on the floor of the 4843 AMSF.

WHC (F. A. Ruck III) stated that, from past experience, if any oil stains are present, they would likely be from the operation of the forklift in the building. Also, that they would not analyze out as regulated material.

This issue remains unresolved. Ecology and RL/WHC agreed that the DQO process might be used to resolve the sampling of oil stains on the floor of the 4843 AMSF. Both parties may agree to sample the oil stains and agree on the appropriate analytical parameters, but each party may be making the agreement for different reasons.

- Question on Comment No. 5

Ecology (A. D. Huckaby) requested clarification on the RL/WHC response to NOD Response Table Comment No. 5. Specifically, what does 'for information only' mean?

RL (R. N. Krekel)/WHC (F. A. Ruck III) responded as follows: The term 'for information only' means that RL/WHC is supplying information that will be used to help understand or to help make decisions about various subjects. However, this type of information is not regulated or required by WAC 173-303 for the purposes of closing a RCRA treatment/disposal/storage facility (TSDF).

5. Set Next Meeting Date

The next meeting has been set for December 14, 1993, for 8:00 am in Richland, Washington.

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Attachment 4

Unit Managers Meeting
4843 ALKALI METAL STORAGE FACILITY
740 STVCN, RM 1320
Richland, Washington

Meeting Held November 10, 1993
From 3:00 pm to 4:30 pm

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)

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Distribution:

J. G. Adler	WHC	H6-23
J. K. Bartz	GSSC	A4-35
R. C. Brunke	WHC	H6-23
R. M. Carosino	RL	A4-52
D. L. Duncan	EPA	Seattle - HW-106
O. A. Farabee	RL	N1-39
R. G. Hastings	RL	N1-39
A. D. Huckaby	Ecology	Kennewick
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

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

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

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