

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

PROJECT MANAGERS MEETING  
 December 3, 1996



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

  
 W. R. Brown, Representative, Fluor Daniel Hanford, Inc.

Date: 2-19-97

  
 D. E. Jackson, Project Manager, Department of Energy, Richland Operations Office

Date: 3-10-97

  
 J. M. Thurman, Representative, Lockheed Martin Hanford Corporation

Date: 2/5/97

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

Date: 03/10/97

Purpose: Discuss current Double-Shell Tank Farm issues related to Milestone M-32-00.

Meeting minutes are attached. The minutes are comprised of the following:

- Attachment 1 - Summary of Discussion, Agreements and Actions
- Attachment 2 - Attendance List
- Attachment 3 - Draft M-32-96-02 (as provided by Ecology)

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Summary of Discussion, Agreements and Actions

The purpose of this meeting was to continue discussions on change control form M-32-96-02, which proposes new double-shell tank (DST) system integrity assessment Hanford Federal Facility Agreement and Consent Order interim milestones and target dates.

The meeting began with a videotape showing of the ultrasonic examination mock-up test and the AW-103 tank ultrasonic examination, which were both performed in November 1996. Mr. Keith Scott, of SGN Eurisys Services Corporation (SESC), mentioned that one 10-1/4" strip takes about 6 hours to complete (each tank has a 20" strip examined on the primary tank and on the secondary tank). He noted that based on the AW-103 tank wall conditions, the other tank walls probably will not require cleaning prior to performing the ultrasonic examinations. For the first two 10-1/4" scans (one on the primary tank and the other on the secondary tank), the examination results showed no indications in excess of the acceptance criteria. These results are discussed in a preliminary report (WHC-SD-WM-TD-017, Rev. 0, "Preliminary Results of Tank 241-AW-103 Ultrasonic Examination," dated 11/27/96). Ecology is on distribution for this report.

In discussing the AW-103 tank examination, Mr. Scott explained that the test equipment starts at the top weld and stops just above the last weld at the tank bottom knuckle. He pointed out that as each tank farm probably will have different operators (due to the multiple companies), experiences from previous examinations may be lost. The next tank wall ultrasonic examination will be performed in about three months. This allows time to review equipment available for assessing the knuckle region and for the Tank Structural Integrity Panel (TSIP) to review the AW-103 tank ultrasonic examination results. The next tank to be examined is currently being chosen.

Ms. Laura Cusack, of the Washington State of Ecology (Ecology), suggested getting an independent, qualified, registered professional engineer (IQRPE) "on board" so Ecology could discuss the 20" scan width with them.

Ms. Cusack passed out an Ecology revised copy of change control form M-32-96-02 (see attachment 3) and provided an overview of their proposed changes. Ms. Cusack and Mr. Bob Wilson (Ecology) volunteered to leave the room to allow discussion of the revised change control form.

Upon Ecology's return, Mr. Dale Jackson, of the U.S. Department of Energy, Richland Operations Office (RL), pointed out that target date M-32-09-T01, in which an IQRPE must approve "a report that details the scope of work for all activities performed to assess the integrity of the DST System," committed RL to milestones and target dates before their full scope was known. Ms. Cusack suggested that if the IQRPE recommended a greater scope and budget than what was available, then the milestone could be re-negotiated. Mr. Jackson stated that prior acceptance from legal counsel and the IQRPE would be needed before finalizing the language for this target date. After some discussion over the possible use of the TSIP as the IQRPE, Ms. Cusack asked if a different IQRPE could be arranged now in case the TSIP did not want to be the IQRPE so that the assessment scope could be approved before any more work was completed. Mr. Jackson mentioned that it would be the end of January, when the TSIP would be meeting to review the AW-103 tank ultrasonic examination results, before any further work would be performed. As part of these discussions, Mr. Jackson reminded Ecology that a letter to the IQRPE acknowledging Ecology's acceptance of assessing six DSTs for all 28 DSTs from a regulatory standpoint was still needed. Also discussed during this time, was the certification statement to be used. Ms. Cusack wants the WAC 173-303-810(13)(a) certification statement used because of the "prepared under my direction or supervision" portion of the statement. She says that the U.S. Environmental Protection Agency (EPA) Office of Solid Waste and Emergency Response (OSWER) directive was not used by the Washington Administrative Code.

Agreements/Actions:

1. Ms. Cusack will provide a letter to the IQRPE acknowledging Ecology's acceptance of assessing six DSTs for all 28 DSTs from a regulatory standpoint.
2. Ms. Cusack will provide an electronic copy of the revised draft change control form M-32-96-02 to Mr. Jackson.
3. Mr. Jackson will schedule the next PMM for next week.

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## Attendees

NAME	ORGANIZATION
Russ Brown	Fluor Daniel Hanford, Inc. - TPA Integration
Laura Cusack	Ecology
Suzanne Dahl	Ecology
Geneva Ellis-Balone	DOE-EAP
Brad Erlandson	Lockheed Martin Hanford Corporation
Dale Jackson	DOE-EAP
Mark Ramsay	DOE-RL
Keith Scott	SGN Eurisys Services Corporation
Ana Sherwood	Rust Federal Services of Hanford Inc.
Jack Thurman	Lockheed Martin Hanford Corporation
Bob Wilson	Ecology



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Draft M-32-96-02  
(as provided by Ecology)



## Description/Justification of Change (cont'd)

The DST System Part B Permit is scheduled for issuance in September 1999 by modification of the Hanford Facility RCRA Permit, Dangerous Waste Portion. The interim milestones of this change package support the issuance of that Part B Permit by providing a compliance strategy for the completion of the DST system integrity assessments prior to issuance of the permit.

Once complete, the integrity assessment reports will include a schedule for addressing deficiencies related to structural integrity found during the assessments. The transfer facility compliance plan will address other deficiencies that are not related to structural integrity, such as leak detection (Is this M-32-10-T01?? If not, M-32-11 is needed). Based on the nature of the deficiency, addressing that deficiency could include a permit condition, corrective action, compliance strategy, or future negotiations. Minor deficiencies will have identified resolution (corrective action or compliance strategy) completion dates in the report's deficiency schedule. In the event that a deficiency requires major efforts to remedy the situation, the U.S. Department of Energy, Richland Operations Office and the Washington State Department of Ecology will enter into negotiations on methods to address the issue. In such cases, the report's schedule will propose an initial negotiation meeting date.

This change package adds two new interim milestones, M-32-09 and M-32-10. Interim milestone M-32-09 addresses the DST integrity assessments, while M-32-10 addresses transfer lines (includes diversion boxes, valve pits, pump pits and cleanout boxes), catch tanks, DCRTs, and ancillary equipment (i.e., 241-A-350 Drainage Lift Station, 204-AR Waste Unloading Facility, and seal pots). For M-32-09, six DSTs will be chosen for ultrasonic examination. These six will be selected based on those that have experienced the most corrosive environment during the tanks operation. The goal of these examinations is to obtain certification by an independent, qualified, registered professional engineer (IORPE) in accordance with WAC 173-303-810(13)(a), that the tank system is fit for use over a specified period of time. This package requires DOE to obtain a recommended scope of work sufficient to obtain certification of the entire tank system. This scope of work must be provided by an IORPE.

As part of the DST ultrasonic testing, results will be evaluated by a technical panel of experts (i.e., select members from the Tank Structural Integrity Panel). This panel's evaluation will be considered, along with other information, in determining the need for future ultrasonic testing beyond six DSTs.

The final integrity assessment reports must include a proposed schedule for repeating integrity assessments over the life of the tank system. The schedule must be based on the results of past integrity assessments, age of the tank system, materials of construction, characteristics of the waste and any other relevant factors. Ecology will consider this schedule when developing permit conditions to address future integrity assessments.

~~Other DST dangerous waste tank system compliance issues, such as leak detection, may require the addition of a future interim milestone.~~

Add the following interim milestones:

M-32-09	<p><b>Complete integrity assessments for Double-Shell Tanks (DSTs).</b></p> <p>These integrity assessments will consist of a combination of visual inspections and design reviews on all 28 DSTs, and ultrasonic testing on six DSTs (including their secondary containment). This milestone reflects an agreement between the Washington State Department of Ecology and the U.S. Department of Energy, Richland Operations Office that <u>it may be possible to obtain certification for the DST tank system by performing ultrasonic testing on six DSTs-will undergo ultrasonic testing for the integrity assessment of the 28 DSTs.</u> The results of these tests will be evaluated to determine the need, if any, for <u>future-additional</u> ultrasonic testing of part or all remaining DSTs <u>to obtain the initial certification by an IORPE that the tank system is fit for use over a specified period of time.</u> <u>Subsequent testing as required by WAC 173-303-640(2)(e) will be specified as permit conditions in the Final Permit.</u></p> <p><u>Integrity Assessment Reports will be certified by an IORPE in accordance with WAC 173-303-810(13)(a).</u></p> <p><del>Tank wall ultrasonic testing: The extent of the examination shall be a 20 inch wide by 35 foot long vertical strip of the primary and secondary tanks to detect wall thinning and pits. Crack detection in the primary tank shall include the area adjacent to horizontal welds and will detect longitudinal cracks.</del></p> <p><del>Tank bottom ultrasonic testing: The extent of the examination shall be the area accessible in 8 air slots under the primary tanks at the high stress area between the knuckle and tank bottom. Cracks oriented perpendicular to the air slot, acted on by the highest tank stresses will be detected. Also, wall thinning and pits will be detected.</del></p>	September 1998
M-32-09-T01	<p><u>Submit to Ecology a report that details the scope of work for all activities performed to assess the integrity of the DST System. The report must define the minimum requirements for certification by an IORPE, and be signed by the IORPE who will certify the results in 1999.</u></p>	April, 1997
M-32-09-T024	<p>Perform ultrasonic testing, <u>in conformance with the IORPE's</u></p>	September 1997

been completed by July, 1999 will be incorporated in the final Permit as permit conditions.

Integrity Assessment Report will be certified by an IORPE in accordance with WAC 173-303-810(13)(a).

M-32-10-T03

Complete and submit, to Ecology, certified integrity assessment reports for five double-contained receiver tanks (DCRTs). These DCRTs are 244-TX, 244-BX, 244-U, 244-S, and 244-A. Provide a schedule to address any deficiencies described in the report related to DCRT compliance. Deficiencies that have not been completed by July, 1999 will be incorporated in the final Permit as permit conditions.

September-  
July 1999/1999

Integrity Assessment Reports will be certified by an IORPE in accordance with WAC 173-303-810(13)(a).

M-32-10-T04

Complete and submit, to Ecology, certified integrity assessment reports for DST ancillary equipment. This ancillary equipment is comprised of the 241-A-350 Drainage Lift Station, the 204-AR Waste Unloading Facility, and 16 seal pots (for which a representative evaluation will be performed). Provide a schedule to address any deficiencies described in the report related to tank ancillary equipment compliance. Deficiencies that have not been completed by July, 1999 will be incorporated in the final Permit as permit conditions.

September  
July 1999

Integrity Assessment Reports will be certified by an IORPE in accordance with WAC 173-303-810(13)(a).

M-32-11

Complete and Submit, to Ecology, the Transfer facility compliance Plan (Rev. 2) (TFCP) that addresses all non-compliant conditions within the DST transfer system.

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Additional milestones or other enforceable mechanisms to support the TFCP will be negotiated between Ecology and DOE by April 30, 1997.

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**DISTRIBUTION LIST**

Name			MSIN		
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D. E. Jackson	RL	A5-15	M. T. Yasdick	RFSH	H6-10

Administrative Record: TPA Milestone M-32-00:  
 T-2-5, TS-2-1, T-2-7, TS-2-3, S-2-3  
 [Care of EDMC, LMSI (H6-08)]

Please send comments on distribution to A. R. Sherwood, H6-22, 376-6391.