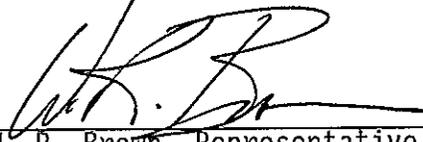


Meeting Minutes
Interim Status Dangerous Waste Tank Systems
Hanford Federal Facility Agreement and Consent Order
Milestone M-32-00

PROJECT MANAGERS MEETING
December 11, 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: 3/10/97

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 RL)

MILESTONE M-32-00
PROJECT MANAGERS MEETING
December 11, 1996

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 Hanford Federal Facility Agreement and Consent Order double-shell tank (DST) system integrity assessment interim milestones and target dates.

Mr. Dale Jackson, of the U.S. Department of Energy, Richland Operations Office (RL), distributed the RL revised change control form M-32-96-02 and reviewed the latest changes made. He mentioned that there would still be some future minor changes made such as title additions.

As the selection criteria document was referenced to in this revision of the change control form, Ms. Laura Cusack, of the Washington State Department of Ecology (Ecology), said that she would review the document again. She pointed out that Ecology was interested in getting the independent, qualified, registered, professional engineer (IQRPE) involved early in the assessment process and in using the Washington Administrative Code (WAC) 173-303-810(13)(a) certification statement.

Mr. Jackson responded by agreeing to use the WAC 173-303-810(13)(a) certification statement as long as Mr. Keith Scott, of SGN Eurisys Services Corporation (SESC), was used as the IQRPE. Mr. Scott satisfies the WAC 173-303-040 definition for an IQRPE. If Mr. Scott was not used as the IQRPE, then the certification language allowed by the U.S. Environmental Protection Agency, Office of Solid Waste and Emergency Response (OWSER) directive would be used. A discussion on the objective of the IQRPE's certification (assessment report accuracy vs. tank fitness for use) followed. Mr. Jackson brought up the point that the proposed interim milestones and target dates were not clear on what happened if any of the DSTs were found to be unfit for use.

Ms. Cusack pointed out that the integrity assessment report could state that the DSTs have integrity under certain conditions. She said that if more than six tanks needed to be examined, they would be examined under a future milestone after M-32-09-T04 was completed (beyond the 9/98 completion date). Mr. Jackson said that language explaining required actions should the tanks be unfit was needed.

Checking to be sure that she understood RL's position, Ms. Cusack reiterated that RL maintained that the IQRPE certification meant the assessment method used was adequate to make a determination on the tank's integrity and that the report's information was true and accurate. Mr. Jackson responded that if Ecology wanted more than what was required by the regulations, then the interim milestones' language would need to be modified. Also, if the WAC 173-303-810(13)(a) certification was used verbatim, then Mr. Scott would be used as the IQRPE.

Ms. Cusack asked if Ecology changed the certification statement to alleviate RL's concerns about having the IQRPE directly supervise the work, would RL look at such language. Mr. Jackson replied that yes, RL would be willing to review such language.

Next, the discussion focused on the "enforceable mechanism" language used when discussing potential deficiencies and on the Transfer Facility Compliance Plan of M-32-10-T02.

The meeting was adjourned to allow Ecology time to review the change control form in detail.

Agreements/Actions:

1. Mr. Jackson agreed to schedule the next PMM.

MILESTONE M-32-00
PROJECT MANAGERS MEETING
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Attendees

NAME	ORGANIZATION
Russ Brown	Fluor Daniel Hanford, Inc. - TPA Integration
Laura Cusack	Ecology
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

Attachment 3

MILESTONE M-32-00
PROJECT MANAGERS MEETING
December 11, 1996

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

DRAFT

Change Number M-32-96-02	<p align="center">Federal Facility Agreement and Consent Order Change Control Form</p> <p align="center"><small>Do not use blue ink. Type or print using black ink.</small></p>	Date 12-02-96 12-11-96
Originator S. Dahl / L. Cusack	Phone (509) 736-5705 / 736-3038	
Class of Change <input type="checkbox"/> I - Signatories <input checked="" type="checkbox"/> II - Executive Manager <input type="checkbox"/> III - Project Manager		
Change Title Addition of M-32 Milestones for the Double-Shell Tank System.		
Description/Justification of Change <p>As a condition of obtaining the final status permit, WAC 173-303-640(2) requires that integrity assessments be conducted on existing tanks by January 12, 1988. This Milestone (M-32-04) was originally drafted to establish a path for compliance with the regulation. Major Milestone M-32-00 states that "completion of interim milestone tasks may identify the need for additional actions or interim milestones in the future." The Tank Waste Remediation Systems Transfer Facility Compliance Plan (WHC-SD-WM-EV-094, Rev. 0) submitted in fulfillment of M-32-04-T04 identified portions of the</p> (Continued on the following page)		
Impact of Change <p>Deficiencies identified during assessment activities may result in the need for additional milestones or target actions in which event a new major milestone completion date may need to be established.</p>		
Affected Documents Hanford Federal Facility Agreement and Consent Order Action Plan, Appendix D, Table D.		
Approvals _____ Date ___ Approved ___ Disapproved DOE _____ Date ___ Approved ___ Disapproved EPA _____ Date ___ Approved ___ Disapproved Ecology		

Description/Justification of Change (cont'd)

Double-Shell Tank (DST) Transfer System that are not in full compliance with interim status dangerous waste management regulations, and require corrective actions and/or compliance strategies. This report is to be updated ~~as indicated in this change package in December 1996 (Rev. 1)~~. The Tank Waste Remediation System Tank System Integrity Assessments Program Plan (WHC-SD-WM-AP-017, Rev. 1) submitted in fulfillment of M-32-04-T05 identified a path forward to complete integrity assessments of the DST system including double-contained receiver tanks (DCRTs), the 241-A-350 Drainage Lift Station, the 204-AR Waste Unloading Facility, and various transfer lines, diversion boxes, valve pits, pump pits, seal pots, and cleanout boxes.

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 addressed by the milestone and target actions contained in this change package 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 (RL) and the Washington State Department of Ecology (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 tank selection criteria identified in the Description of Double-Shell Tank Selection Criteria for Inspection (WHC-SD-WM-ER-529, Rev. 0) document those that have experienced the most corrosive environment during the tanks operation. The goal of these examinations is to verify that the DSTs have adequate integrity to be properly operated in accordance with applicable regulations obtain certification by an independent, qualified, registered professional engineer (IQRPE) 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 RL DOE to perform obtain a recommended scope of work sufficient to make a determination of the DSTs' integrity obtain certification of the entire tank system. This scope of work must be agreed to provided by an IQRPE. This milestone reflects an agreement between Ecology and RL that it may be possible to confirm the integrity of all 28 DSTs by performing the assessment activities as identified in the milestones and target actions contained in this change package. The results of these tests will be evaluated to determine the need, if any, for additional ultrasonic testing of part or all remaining DSTs. Subsequent testing as required by WAC 173-303-640(2)(e) will be specified as permit conditions in the final Permit.

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 ~~the~~ past integrity assessments, age of the tank system, materials of construction, characteristics of the waste and any other relevant factors. ~~RI Ecology~~ will consider this schedule when developing ~~Part B~~ permit ~~application~~ ~~schedules for~~ conditions to address future integrity assessments.

Add the following interim milestones:

- | | | |
|-------------|---|----------------|
| M-32-09 | Complete integrity assessments for Double-Shell Tanks (DSTs). | September 1998 |
| | <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 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. The results of these tests will be evaluated to determine the need, if any, for future additional ultrasonic testing of part or all remaining DSTs to obtain the initial certification by an IQRPE that the tank system is fit for use over a specified period of time. Subsequent testing as required by WAC 173-303-640(2)(e) will be specified as permit conditions in the Final Permit.</p> <p>Integrity Assessment Reports will be certified by an IQRPE in accordance with WAC 173-303-810(13)(a).</p> | |
| M-32-09-T01 | <p>Prepare Submit to Ecology a report that details the scope of work for all activities performed minimum requirements to assess the integrity of the DSTs System. The report must define the minimum requirements for certification by an IQRPE, and to be signed by an the IQRPE who will certify the results in 1999.</p> | April 1997 |
| M-32-09-T02 | Perform ultrasonic testing, as described in M-32-09-T01 in conformance with the IQRPE's requirements, of two tank walls and one tank bottom. | September 1997 |

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M-32-09-T03	Perform ultrasonic testing, as described in M-32-09-T01 in conformance with the IQRPE's requirements, of four tank walls and five tank bottoms.	September 1998
M-32-09-T04	Complete and submit to Ecology, a certified integrity assessment report for DST s . Provide a schedule to address any deficiencies described in the report related to tank compliance. Identified deficiencies will be corrected through some enforceable mechanism negotiated between the Ecology and RL DOE. Negotiations will be completed by January 31, 1999.	September 1998
M-32-10	Complete integrity assessments for specified Double-Shell Tank (DST) system.	September 1999
M-32-10-T01	Complete and submit, to Ecology, a certified integrity assessment report for DST transfer lines (includes diversion boxes, valve pits, pump pits and cleanout boxes). This assessment will be based on a representative evaluation. Provide a schedule to address any deficiencies described in the report related to tank transfer line compliance. Identified deficiencies will be corrected through some enforceable mechanism negotiated between the Ecology and RL DOE. Negotiations will be completed by April 30, 1997. Integrity Assessment Report will be certified by an IQRPE in accordance with WAC 173-303-810(13)(a).	December 1996 February 1997
M-32-10-T02	Prepare the Transfer Facility Compliance Plan (Rev. 1) (TFCP) addressing all known non-compliant tank system conditions necessary for compliance with WAC 173-303-640 within the DST transfer system. Additional milestones or other enforceable mechanisms to support the TFCP will be negotiated between Ecology and RL.	March 1997

M-32-10-T023 Complete and submit, to Ecology, certified integrity assessment reports for nine catch tanks. These catch tanks are 241-A-302A, 241-ER-311, 241-EW-151, 241-TX-302C, 241-U-301B, 241-UX-302A, 241-AZ-151, 241-AX-152, and S304. Provide a schedule to address any deficiencies described in the report related to catch tank compliance. Deficiencies that have not been addressed completed by July, 1999 will be incorporated in the final Permit as permit conditions. July 1999

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

M-32-10-T034 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 addressed completed by July, 1999 will be incorporated in the final Permit as permit conditions. July 1999

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

M-32-10-T045 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 addressed completed by July, 1999 will be incorporated in the final Permit as permit conditions. July 1999

Integrity Assessment Reports will be certified by an IQRPE 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.~~

~~December, 1996~~

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

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

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Administrative Record: TPA Milestone M-32-00:
 T-2-5, TS-2-1, T-2-7, TS-2-3, S-2-3
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Please send comments on distribution to A. R. Sherwood, H6-22, 376-6391.