

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

**PROJECT MANAGERS MEETING  
April 29, 1997**



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

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

Date: 9-4-97

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

Date: 9-29-97

*Not Present*

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

Date: \_\_\_\_\_

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

Date: \_\_\_\_\_

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

**MEMO**

Interim Status Dangerous Waste Tank System  
Hanford Federal Facility Agreement and Consent Order  
Milestone M-32-00 Project Managers Meeting minutes  
April 29, 1997

The following Tri-Party Agreement M-32-00 Project Managers Meeting minutes have not been signed by the Washington State Department of Ecology (Ecology). Ecology disagrees with a statement made within the minutes; "Ms. Cusack explained that this need did not have a regulatory driver but rather was driven from a programmatic standpoint." The U.S. Department of Energy, Richland Operations Office maintains that this statement was made. Therefore, the minutes are issued without Ecology's signature.

This meeting was held on April 29, 1997 to discuss the proposed Double-Shell Tank interim milestone addition to the major M-32-00 milestone.

Attachment(s): None

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**Summary of Discussion, Agreements and Actions**

Mr. Dale Jackson, of the U.S. Department of Energy, Richland Operations Office (RL), opened the meeting by stating that RL desires to immediately address the Washington State Department of Ecology (Ecology) preference that the RL-Waste Storage Division (WSD) be assigned project management responsibility for Double-Shell Tank (DST) integrity assessment activities. Mr. Jackson announced that effective immediately, Mr. Mark Ramsay (RL-WSD) will be taking over as RL's Project Manager and lead negotiator with regard to proposed Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) DST integrity assessment interim milestones. A memorandum from Mr. John Wagner (RL) to Mr. Jackson Kinzer (RL) reflecting this change will be drafted.

Mr. Ramsay reviewed some history on the DST negotiations for the benefit of Mr. Jim McClusky (RL) who was attending these negotiations for the first time. Also, Mr. Ramsay informed Ecology that an independent, qualified, registered professional engineer (IQRPE), from the Seattle area, had reviewed the DST integrity assessment strategy. The IQRPE determined that ultrasonic (UT) testing of any of the DSTs was not necessary in order to provide an integrity assessment certification on the DSTs.

Ms. Laura Cusack (Ecology) stated that the integrity assessments were needed to meet the regulations and from a programmatic standpoint for the future use of the DSTs. She added that there is a need to determine the tanks' condition with respect to corrosion and not just to determine if they are leaking. Ms. Cusack explained that this need did not have a regulatory driver but rather was driven from a programmatic standpoint. Ms. Dahl stated Ecology's position that Ecology determines what constitutes compliance with its regulations, and that the Tri-Party Agreement should not be used to negotiate what compliance means.

Mr. McClusky suggest that the DST integrity assessment program proceed with what makes sense technically and that such a program would meet the test of regulatory compliance. Ms. Cusack mentioned that until recently, performing UT testing on 6 DSTs was considered "right" but that now the assessment would be relying mostly on leak tests. Mr. Ramsay responded by asking how much would be enough for people to be satisfied, given that the DST knuckle region and bottom inspections may not be feasible. He pointed out that the real question was not "will the DSTs last for the next 20 years" but "do we have the appropriate backup mechanisms to address a leak should one occur." Ms. Cusack emphasized that just because all the areas of interest may not be accessible, the assessment program should not eliminate performing the inspections that are

possible. She said that inspecting the knuckle region and the tank bottom would be preferred but if the inspections could not be performed, they were not important enough to also eliminate UT testing of the tank walls.

Ms. Cusack stated that if the assessment strategy was technically defensible, activities could be extended beyond the M-32-00 major milestone date of September 1999 and documented as permit conditions. She said that if the IQRPE approves the assessment strategy, then Ecology would accept the strategy. Ms. Cusack expected the IQRPE involvement to result in the confirmation that the tanks were not leaking, a description of the current condition of the tanks with respects to corrosion, cracking, etc., and, if the information gathered was not enough to evaluate all 28 DSTs, identification of additional activities needed. She was not expecting the IQRPE to state that the tanks would last for a specified number of years. Ms. Cusack emphasized that she wanted some information on the DSTs' corrosion rate/degradation. Ms. Ana Sherwood, of Rust Federal Services of Hanford, stated that neither UT tests nor corrosion rate/degradation assessments were required by the regulations. Ms. Cusack disagreed, stating that UT testing was needed as was assessing the tanks' corrosion condition and inspecting the tank bottom. Ms. Dahl said that she did not want to dispute the regulations during this meeting. If required, a compliance letter outside of the Project Managers Meeting on the interpretation of the regulations could be provided.

Ms. Cusack stated she could provide a letter stating that the regulations required that UT testing be performed and that the tanks' corrosion condition be evaluated, as Ecology considered the DSTs to be enterable tanks (as far as the annulus). Mr. Ramsay warned that it was possible that there might not be enough funds to meet Ecology's scope within the schedule they wanted and that all inspections might not be feasible. Both Ms. Cusack and Ms. Dahl allowed that the assessment schedule was open to change. Ms. Cusack added that while Ecology would certainly be satisfied with inspecting the tanks' wall, bottom, knuckle, and one tank's weld, that Ecology would accept, as a minimum, performing a 20" tank wall inspection if the IQRPE would still be able to make a corrosion assessment. Mr. Ramsay asked if the IQRPE was asked to propose an alternative method to assessing the tanks' condition, would Ecology accept his recommendation without further input and second guessing. Ms. Cusack said that she would agree, as long as the IQRPE assessed the tanks' corrosion condition and did not rely solely on leak tests. She said that if the IQRPE accepted UT testing of a 20" strip on the tanks' wall, of the tanks' knuckle region and bottom, and of a weld, then Ecology would accept the strategy. Even if the knuckle and bottom inspections were eliminated due to difficulties in performing the inspections, Ecology would accept the assessment strategy. However, she explained, Ecology would not accept an assessment on the DSTs that was based on leak tests, even if the IQRPE would.

Mr. Jackson suggested that Ecology issue their proposed letter defining compliance with tank integrity assessment regulations by early next week, give RL and the contractors two weeks to review it, and then meet with RL again the following week.

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**Attendees**

<b>NAME</b>	<b>ORGANIZATION</b>
Russ Brown	Fluor Daniel Hanford - TPA Integration
Laura Cusack	Ecology
Suzanne Dahl	Ecology
Dale Jackson	DOE/RL-EAP
Jim McClusky	DOE/RL-WSD
Mark Ramsay	DOE/RL-WSD
Ana Sherwood	Rust Federal Services of Hanford Inc.



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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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