



0054454

Department of Energy
Richland Operations Office
P.O. Box 550
Richland, Washington 99352

FEB 22 2001

01-RCA-119

Mr. Michael A. Wilson, Program Manager
Nuclear Waste Program
State of Washington
Department of Ecology
P.O. Box 47600
Olympia, Washington 98504

RECEIVED
FEB 27 2001

EDMC

Dear Mr. Wilson:

QUARTERLY NOTIFICATION OF CLASS 1 MODIFICATIONS TO THE HANFORD FACILITY RESOURCE CONSERVATION AND RECOVERY ACT (RCRA) PERMIT, DANGEROUS WASTE PORTION (QUARTER ENDING SEPTEMBER 30, 2000 – CONDITION I.C.3)

Please reference the enclosed copy of the State of Washington Department of Ecology (Ecology) letter from Laura Ruud to Steven Wisness, U.S. Department of Energy, Richland Operations Office (RL); Roby Enge, Pacific Northwest National Laboratory; and Richard Gurske, Fluor Hanford, Inc., same subject as above, dated December 15, 2000. This letter states Ecology's reasons for rejecting proposed modifications to the training plans for five final status units.

RL continues to work with the local office of Ecology to resolve the concern identified in the attached letter. However, RL is requesting that Ecology reconsider its rejection of the proposed modifications. The reason for rejecting the modification requests for the training plans was cited as, "the proposed changes did not meet the minimum permit requirements for compliance with Washington Administrative Code (WAC) 173-303-806(4)(a)(xii)." In relevant part, WAC 173-303-806(4)(a)(xii) requires Part B of the permit application to contain "an outline of both the introductory and continuing training programs ... (and) a brief description of how training will be designed to meet actual job tasks ..."

The training plan outlines, submitted in the modification request, do meet the requirements of the cited section. The outlines submitted were based on the outline developed in conjunction with Ecology for the "Hanford Facility Dangerous Waste Permit Application, 222-S Laboratory Complex" (222-S permit application) submitted in August 2000 and included "an outline of both the introductory and continuing training programs ... (and) a brief description of how training will be designed to meet actual job tasks ..." The Notice of Deficiency comments relating to the 222-S permit application relating to Chapter 8, Personnel Training, were resolved in May 2000 prior to the submittal of the permit application. It is not clear why Ecology accepts the similar outline for the 222-S unit, but not for other final status units.

Noted in the attached letter "... Ecology instructed RL to allow the 222-S permit to be finalized *before proceeding with changes to the other units under final status in the Sitewide Permit.*" At the time of this instruction, the date of finalizing the 222-S permit was unknown. As noted in the same meeting, RL informed Ecology of the need to modify at least one permitted unit's training

FEB 22 2001

plan and of its desire to adopt the 222-S format at the same time, rather than in stages. Hanford Permit condition I.C.3 and WAC 173-303-830 do not provide for delay in submittal of permit modifications, nor do they prevent the modification of existing permit documentation. There is no readily evident regulatory or Hanford Permit basis for delaying submittal of the requested modifications.

RL understands and supports Ecology's desire to obtain public input on the new outline format for training plans. However, final status permit documentation for personnel training also required modification. Some of these modifications were needed in the near term. Ecology Project Managers and Unit Managers understood that a single modification, adopting the outline format at the same time as making other needed modifications, was more efficient. This was agreed to and documented in meeting minutes.

On January 18, 2001, a meeting was held with Ecology to resolve the rejected Class 1 Modifications. A path forward for final status units was agreed upon with Ecology (see Attached e-mail).

If you have any questions or need further information concerning the training plan modifications, please contact Astrid Larsen, of my staff, at (509) 372-0477.

Sincerely,



Joel Hebdon, Director
Regulatory Compliance and Analysis Division

RCA:APL

Enclosures:

1. Ecology Letter of December 15, 2000
2. Meeting Minutes
3. E-mail

cc w/encl:

Administrative Record
Ecology Nuclear Waste Program Library
R. J. Landon, BHI
W. T. Dixon, CHG
R. H. Richards, CTUIR
M. Anderson-Moore, Ecology
B. L. Becker-Khaleel, Ecology
L. J. Cusack, Ecology
K. A. Conaway, Ecology
G. P. Davis, Ecology

F. Jamison, Ecology
L. E. Ruud, Ecology
R. R. Skinnarland, Ecology
R. H. Gurske, FHI
S. A. Thompson, FHI
Environmental Portal, LMSI
P. Sobotta, NPT
A. K. Ikenberry, PNNL
R Jim, YN

Enclosure 1

(6 pages including cover)



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

1315 W. 4th Avenue • Kennewick, Washington 99336-6018 • (509) 735-7581

December 15, 2000

Mr. Steven H. Wisness, Director
U.S. Department of Energy
P.O. Box 550, MSIN: A5-15
Richland, Washington 99352

Mr. Roby D. Enge, Director
Environment, Safety, and Health
Pacific Northwest National Laboratory
P.O. Box 999, MSIN: P7-75
Richland, Washington 99352

Mr. Richard H. Gurske, Project Manager
Environmental Services
Fluor Hanford
P.O. Box 1000, MSIN: H8-73
Richland, Washington 99352

Dear Messrs. Wisness, Enge, and Gurske:

Re: Quarterly Notification of Class 1 Modifications to the Hanford Facility Resource Conservation & Recovery Act (RCRA) Permit, Dangerous Waste Portion (Quarter Ending September 30, 2000 - Condition I.C.3)

Enclosed are the Modification Notification Forms indicating those modifications that the Washington State Department of Ecology (Ecology) has reviewed and approved for the referenced quarterly Class 1 Modifications.

These approved quarterly modifications include:

- Part III, Chapter 2 (305-B Storage Facility)
 - Chapters 1, 3, 5, 9, 10, 11, 13, 14, and 15
 - Appendices 4B and 6A
- Part III, Chapter 3 (PUREX Storage Tunnels)
 - Chapter 1, Part A, Form 3 (4 notification forms)

RECEIVED
DEC 19 2000
DOE RL/CCC

Messrs. Wisness, Enge, and Gurske
December 18, 2000
Page 2

* Approved Part A enclosed.

- Part III, Chapter 4 (Liquid Effluent Retention Facility [LERF] and 200 Area Effluent Treatment Facility [ETF])
 - Chapter 7.0, Section 7.0
 - Chapter 7.0, Table 7.1
 - Part III, Chapter 4, Conditions III.4.A and III.4.B
 - Appendix 7A

- Part III, Chapter 5 (242-A Evaporator)
 - Chapter 7.0, Section 7.0
 - Chapter 7.0, Table 7.1
 - Part III, Chapter 5, Conditions III.5.A and III.5.B
 - Appendix 7A

- Attachment 4 (Hanford Emergency Plan)
 - Section 3, Table 3-1, page 11 of 14
 - Section 3, Table 3-1, page 13 of 14
 - Section 3, Table 3-1, page 14 of 14
 - Section 7, Figure 7.3
 - Section 11, Subsection 11.2
 - Section 14, Subsection 14.3.1.1

Last quarter, Ecology had not completed review of the proposed modifications to Part III, Chapter 4 (LERF/ETF) regarding groundwater monitoring. These following changes are approved and provided with this package. I apologize for the delay.

- Part III, Chapter 4 (LERF/ETF)
 - Chapter 5.0, Section 5.1*
 - Chapter 5.0, Section 5.2
 - Chapter 5.0, Section 5.5
 - Part III, Chapter 4, Condition III.4.B.d.

*WAC 173-303-830, Appendix I, requires changes in the number, location, depth, or design of upgradient or downgradient wells of a permitted groundwater monitoring system to be handled as a Class 2 modification. However, given the extenuating circumstances associated with LERF/ETF (e.g., declining groundwater elevations and the difficulty in siting a replacement monitoring well that will provide useful groundwater quality information downgradient of the facility), Ecology is approving this change as a Class 1 modification. Ecology is actively working with the U.S. Department of Energy (USDOE) on developing a final monitoring program that will be presented for public comment. (Reference: Letter, Stan

Leja, Ecology to Marvin Furman, USDOE, September 22, 1999, "Variance from Interim-Status Groundwater Monitoring Requirements at the Liquid Effluent Retention Facility.")

The following proposed Class 1 modifications related to changes in training requirements are not approved:

- Part III, Chapter 2 (305-B Storage Facility)
 - Chapter 8 and Appendix 8A
- Part III, Chapter 3 (PUREX Storage Tunnels)
 - Chapter 8 and Appendix 8A
- Part III, Chapter 4 (LERF/ETF)
 - Chapter 6, Section 6.1.1.2
 - Chapter 8.0 and Appendix 8A
- Part III, Chapter 5 (242-A Evaporator)
 - Chapter 8.0 and Appendix 8A
- Part III, Chapter 6 (325 Hazardous Waste Treatment Unit)
 - Chapter 8.0 and Appendix 8A

These modification requests are being rejected because the proposed changes did not meet the minimum permit requirements for compliance with Washington Administrative Code (WAC) 173-303-806(4)(a)(xii). Earlier this year, Ecology met with representatives from USDOE and the contractors to discuss how to both meet WAC requirements and streamline the permit process for training associated with the 222-S Laboratory Complex (222-S) Part B permit application. During this meeting, Ecology provided written examples from two existing permits (i.e., Sol-Pro, Inc., and Burlington Environmental, Inc.) of how to present the required information in an acceptable format. Ecology's direction was as follows:

"To meet this WAC requirement [WAC 173-303-806(4)(a)(xii)], the permittee must submit an outline of the training program which shall include the following information:

- **A description of each training course identifying the content as an introductory training and/or continuing training requirement (e.g., introductory, on-the-job training, dangerous waste operations training, emergency response training, continuing training, annual refresher training, qualifications of trainers, documentation of training). See Sol-Pro Permit, Section 3.**
- **An outline of the course content. See Burlington Permit, Table H1-1.**

Messrs. Wisness, Enge, and Gurske

December 18, 2000

Page 4

- A matrix identifying, by job title, the introductory and continuing training courses. See Sol-Pro Permit, Table 3-1.
- Ecology has noticed that Condition II.C.2. requires general facility training within 6 months of hire, but does not mention training required when personnel take on a new position at the facility (WAC 173-303-330(1)(c)(ii)). To satisfy this requirement for specific units, language is needed that states facility personnel will complete the unit-specific training program within 6 months of employment at or assignment to the facility, or to a new position at the facility, whichever is later.

The above information will become part of the unit-specific chapter in the Permit.

The permittee is requested to provide Ecology with a copy of the written training plan (WAC 173-303-330(2)) at the time the permit application is provided. The written training plan is not included with the certified permit application. The information in the written training plan will be used to evaluate the suitability of the training content, e.g., job description, requisite skills, education, other qualifications, duties. The written training plan is kept at the facility and is not included in the Permit.”

Further, Ecology instructed USDOE to allow the 222-S permit to be finalized before proceeding with changes to the other units under final status in the Sitewide Permit. Once issued, the 222-S final permit would be an approved model for revising the training portion of the other final units. This concept was also discussed in the June 13, 2000, Steering Committee Meeting. The following is an excerpt from the Steering Committee meeting minutes summarizing a conversation with Mr. Harold Tilden, Pacific Northwest National Laboratory (PNNL):

“Mr. Tilden stated that DOE/Contractors plan to submit modified Training Chapters for the five final status units excluding 616 NRDWSF, the modification will be submitted as Class 3 modifications requesting the modifications be downgraded to Class '1' modification. Ms. Thompson provided Ms. Ruud with draft copies of the Modification Forms and proposed Chapter 8.0 for the five final status units. Mr. Tilden stated that the Training Chapter 8.0 reflects language agreed on in the 222-S Laboratory workshops. Mr. Tilden stated that the Modification Forms and the modified Chapter 8.0 would be submitted, and the unit Training Plans would be provided later. Ms. Ruud stated that Ecology would not accept these modifications until the 222-S Laboratory completes the public comment and is included in the Permit. Ms. Ruud stated that no agreement is finalized with 222-S Laboratory to warrant going ahead with modifying the Chapter 8.0 for the final status units. Ms. Ruud stated that 222-S Laboratory is a pilot and Ecology would want to wait until completion of the public comment period and know what the result is before modifying all existing units. Ms. Ruud stated that when the Chapter 8.0 is modified, the unit specific Training Plans would need to be submitted under separate cover.

Messrs. Wisness, Enge, and Gurske

December 18, 2000

Page 5

Mr. Tilden stated that 325 HWTUs needed to modify their Training Plan and would like to make all the changes at once. Ms. Ruud suggested that 325 HWTUs submit a Modification Form for what needs to be modified and wait on the 222-S Laboratory pilot modifications. Ms. Ruud stated that 222-S Laboratory workshop discussions are not solid, and what gets discussed at the workshops is not always what is submitted. Ms. Ruud stated it was good to discuss this proposed modification ahead of time to prevent going through the rejection process."

The training information provided to Ecology did not include the information requirements set forth above (e.g., the matrix was not provided as part of the permit). Ecology is in the process of issuing the 222-S permit for public comment. USDOE should wait until the public comment period is completed and the 222-S permit is final before proceeding with changes for the other final status units.

Again, USDOE and contractor staff are encouraged to discuss proposed Class 1 changes with Ecology's Unit Managers during the quarter to clarify any questions and/or concerns. If you have any questions or comments regarding this letter, please do not hesitate to contact me at (509) 736-5715.

Sincerely,



Laura Ruud, Permitting Specialist
Nuclear Waste Program

LR:sb

Enclosures (*Forms and PUREX Part A*)

cc w/enclosure:

Ellen Mattlin, USDOE
Lorna Dittmer, BHI
Suzette Thompson, FH
Alice Ikenberry, PNNL

J.R. Wilkinson, CTUIR

Donna Powaukee, NPT

Russell Jim, YIN

Administrative Record: SWP

cc w/o enclosure:

Clifford Clark, USDOE
Sue Price, FH
Mary Lou Blazek, OOE

Enclosure 2

(6 pages including cover)

Meeting Minutes Transmittal

Hanford Facility RCRA Permit Implementation Steering Committee

Federal Building, Conference Room 269

Tuesday, June 13, 2000

1:00 p.m. – 3:00 p.m.

Summary of Discussion and Commitments/Agreements

Status Modification E – Laura Ruud, Ecology

Ms. Ruud stated that the schedule for issuance of Modification E is delayed, and deferred schedule questions to Ecology management Jane Hedges and Ron Skinnerland. Ms. Ruud stated that once she receives the remainder of the unit specific portions it takes about two weeks from that point to issue the Permit.

Discussion on how non-enforceable sections of the Permit are updated– All

Ms. Ruud asked that this item be moved to the July meeting, to allow further discussion within Ecology. Ms. Ruud checked with Ecology headquarters and was informed that other permits do not include non-enforceable sections. Ms. Ruud stated that the Permit revision in 2004 should look at how the Permit is written, and including only enforceable sections would prevent the problem with modifying non-enforceable sections.

Status of Part A Workshop– Ellen Mattlin, DOE-OSS

Ms. Ruud stated that she has not heard from Ms. Mattlin to meet on the Workshop content and instructor. Ms. Thompson, FH stated that Ms. Mattlin is on special assignment for three more weeks. Ms. Ruud asked Ms. Thompson to follow-up with Ms. Mattlin to setup a meeting After the July 4th.

Action: Ms. Thompson, FH

Have Ms. Mattlin setup meeting on Part A Workshop with Ms. Ruud following July 4th.

Training Plans – Harold Tilden, PNNL

Mr. Tilden stated that DOE/Contractors plan to submit modified Training Chapters for the five final status units excluding 616 NRDWSF, the modification will be submitted as Class 3 modifications requesting the modifications be downgraded to Class '1 modification. Ms. Thompson provided Ms. Ruud with draft copies of the Modification Forms and proposed Chapter 8.0 for the five final status units. Mr. Tilden stated that the Training Chapter 8.0 reflects language agreed on in the 222-S Laboratory workshops. Mr. Tilden stated that the Modification Forms and the modified Chapter 8.0 would be submitted, and the unit Training Plans would be provided later. Ms. Ruud stated that Ecology would not accept these modifications until the 222-S Laboratory completes the public comment and is included in the Permit. Ms. Ruud stated that no agreement is finalized with 222-S Laboratory to warrant going ahead with modifying the Chapter 8.0 for the final status units. Ms. Ruud stated that 222-S Laboratory is a pilot and Ecology would want to wait until completion of the public comment period and know what the result is before modifying all existing units. Ms. Ruud stated that when the Chapter 8.0 is modified, the unit specific Training Plans would need to be submitted under separate cover.

Mr. Tilden stated that 325 HWTUs needed to modify their Training Plan and would like to make all the changes at once. Ms. Ruud suggested that 325 HWTUs submit a Modification Form for what needs to be modified and wait on the 222-S Laboratory pilot modifications. Ms. Ruud stated that 222-S Laboratory workshop discussions are not solid, and what gets discussed at the workshops is not always what is submitted. Ms. Ruud stated it was good to discuss this proposed modification ahead of time to prevent going through the rejection process.

HWTUs Part A, Form 3 Revision Under Final Status – Harold Tilden, PNNL

Mr. Tilden provided Ecology with a draft copy of the 325 HWTUs Part A, Form 3, Rev. 4A (both draft internet and draft Rev. 7/97 formats were provided). Mr. Tilden stated that since 325 HWTUs is a final status unit and the Part A, Form 3 is part of Chapter 1.0 the Part A, Form 3 will be revised through the Permit modification process. Mr. Tilden stated that the modifications are Class 1 modifications and will be submitted in the July 10, 2000 modification package. Mr. Tilden stated that this means the Part A, Form 3 will not require Certification, the Part A, Form 3 will be revised from Rev. 4 to

Rev. 4A reflecting the Form was certified with Revision 4. Mr. Tilden stated that this process is consistent with the process for modifying other Chapters for the unit. Ms. Ruud stated that the process makes sense due to the fact that the proposed changes are minor, administrative, Class 1 changes. Mr. Tilden stated that modifying the Part A, Form 3 has brought up some questions concerning the Format of the Part A, Form 3. Mr. Tilden stated that Ms. Thompson prepared an electronic WORD file for the 7/97 Ecology Part A, Form 3, and it looks exactly like the copy Ms. Ruud had sent. Mr. Tilden stated that an Internet format also exists that the PHMC presented to Ecology over a year ago followed up with a letter. The letter stated that future Part A, Form 3's would be Certified using the Internet format. The Internet format currently reflects the content and format of the Ecology Rev. 2/84 Part A, Form 3. Mr. Tilden asked for a determination on what form to use. Ms. Ruud stated that the Rev. 7/97 Form needs to be used. Ms. Ruud stated that Ecology would expect that as Ecology revises the Part A, Form 3, that the Internet format would reflect those changes. Ms. Ruud stated that with the issuance of the revised WAC that was effective Saturday, June 10, 2000, there is some disconnects with the Rev. 7/97 Part A, Form 3. Ms. Ruud asked that everyone look at the new WAC and the Rev. 7/97 Part A, Form 3 and identify the differences, for discussion at the next meeting.

Action: All

Evaluate new WAC and the Rev. 7/97 Part A, Form 3 and identify the differences, for discussion at the next meeting.

Agenda items for next meeting

- Status Modification E – L. Ruud, Ecology
- Discussion on how non-enforceable sections of the Permit are updated – All
- Status of Part A Workshop – E. Mattlin, DOE-OSS
- Discussion on Differences between new WAC requirements for the Part A, Form 3 and Rev. 7/97 – All

Next Meeting is scheduled for:

Tuesday, July 11, 2000, 1:00 P.M. – 3:00 P.M., Federal Building, Conference Room 269

The August meeting is cancelled due to vacations. The October 10, 2000 meeting date and location were changed to October 17, 2000, 2355 Stevens, Conference Room 203.

Meeting Attendance

	Name	Phone	Project
1.	Roger Bowman	376-4876	FH-R&EC
2.	Sam Clifford	376-5137	FH-ES
3.	Greta Davis	736-3025	Ecology
4.	Lorna Dittmer	372-9221	BHI
5.	Brad Erlandson	372-2678	CH2MHill
6.	Tracy Gow	736-5718	Ecology
7.	Stan Hill	372-1617	CHG
8.	Astrid Larsen	372-0477	DOE-OSS
9.	Tony McKarns	376-8981	DOE-OSS
10.	Mark Riess	376-4026	CHG
11.	Fred Ruck III	376-9876	FH-ES
12.	Laura Ruud	736-5715	Ecology
13.	Jack Sonnichsen	376-9956	FH-ES
14.	Jennifer Su-loker	371-4659	BNFL
15.	Harold Tilden	376-0499	PNNL
16.	Suzette Thompson	372-0958	FH-ES
17.	W. Kenneth Waller	376-3906	PNNL
18.	Terry Winward	373-4002	BAT/DOE-ORP

Meeting Minutes Transmittal

Hanford Facility RCRA Permit Implementation Steering Committee

Federal Building, Conference Room 269

Tuesday, September 12, 2000

1:00 p.m. – 3:00 p.m.

Summary of Discussion and Commitments/Agreements

Introductions – Laura Ruud, Ecology

Ms. Ruud introduced Fred Jamison, Ecology Waste Management Project Manager and Michelle Anderson-Moore, Ecology Unit Manager for 305-B Storage Facility and 325 HWTUs. Ms. Ruud provided an Ecology organization chart revised on September 7, 2000. Ms. Ruud stated that Ms. Bartz's last day with Ecology is September 15, 2000.


NWP orgchart.pdf

Status Modification E – Laura Ruud, Ecology

Ms. Ruud stated that the Joan Bartz work on the WRAP and CWC waste analysis plans (WAPs) would be turned over to Ms. Ruud on Wednesday, September 13, 2000. Ms. Ruud stated that Ecology hopes to issue Modification E by the end of the calendar year (December 31, 2000). Ms. Ruud stated that Ecology would finalize the Permit Conditions for WRAP and CWC, and then check for consistency with the 222-S Laboratory Permit Conditions for Modification F.

Status Modification F – Laura Ruud, Ecology

Ms. Ruud stated that Ecology would not issue Modification F until after Modification E has been issued. There was some discussion on why Modification E would be issued before Modification F, when DOE and the Contractors felt that significant progress had been made on the 222-S Laboratory Complex Permit Application, specifically the WAP and Chapter 8, Training Chapter. Ms. Ruud stated that the Chapter 8, which was submitted as part of the 222-S Laboratory Complex Permit Application, was not what Ecology agreed to in the workshops. Ms. Larsen, DOE stated that DOE believed that Ms. Becker-Khaleel was satisfied with the 222-S Laboratory Complex Chapter 8 and WAP submittals. Ms. Larsen stated that the EPA guidance was used to develop the 222-S Laboratory WAP. Ms. Larsen stated that she spoke with Ms. Becker-Khaleel and that Ms. Becker-Khaleel would be requesting DOE to provide the 222-S Laboratory training plan, so that the Chapter 8 could be reviewed. Ms. Larsen stated that Ms. Becker-Khaleel would also be requesting a couple other documents to support her review of the permit application for 222-S Laboratory. There was also some discussion that WRAP and CWC permit applications were submitted in June 1998, and were out of date, and that both of these units could benefit from the progress made with 222-S Laboratory. Ms. Ruud stated that Ecology is not going to issue the Modifications out of order. Ms. Ruud stated that for consistency Ecology would compare the CWC/WRAP permit conditions with those for 222-S Laboratory.

Ms. Ruud stated that Attachment 33, General Information Document (DOE/RL-91-28), which was provided with the documentation for Modification F did not include enough detail for the modifications that were made. Mr. Sonnichsen, FH provided Ms. Ruud a written detailed description of the Sections modified, accompanied with redlined copy of the document. Mr. Sonnichsen discussed the type of changes that were made to the document, and most of the modifications were typically Class 1 modifications. Mr. Sonnichsen stated that the document was certified based on requirements in Table 12-1 of DOE/RL-91-28, and past practices.

It was agreed by all parties that modified permitting documents submitted to Ecology would clearly identify the modifications that were made.

Status of DOE/RL-94-02 Modification Forms – Suzette Thompson, FH

Ms. Ruud provided the DOE/RL-94-02 Modification Forms to Ms. Thompson for submittal in the next quarterly Class 1 Modification package. Ms. Ruud asked that if Forms are hand carried for quick turnaround, that Ms. Ruud is on distribution, or that the Forms are provided to her for signatures/tracking. Ms. Ruud stated that she was not aware of the DOE/RL-94-02 Forms until this week.

Ms. Ruud stated that the Modification Forms for the LERF/ETF Groundwater Monitoring were withheld from the last quarterly package due to Stan Leja leaving Ecology before reviewing the Forms. Ms. Ruud stated that the Forms have been reviewed and signed by the Ecology groundwater person, and that she would be signing the Forms and issue the Forms next week, provided they met the criteria for Class 1 changes.

Discussion on DOE/RL-91-28, Chapter 12, Table 12-1, Items Requiring Certification – Tony Miskho, FH

Mr. Miskho pointed out the need to review Table 12-1 in Attachment 33, General Information Portion, DOE/RL-91-28, as it relates to the need for certification. Mr. Miskho pointed out that he is not sure how many of the certifications are required by the regulations or driven by the Ecology Checklist. The group decided to add this item to next meeting agenda. Mr. Miskho took an action to research this topic, and provide draft guidance for Table 12-1 modifications. There was some discussion that the check marks requiring certification on Table 12-1 drove the certification and inclusion into the Modification F submittal for DOE/RL-91-28, when the modifications most likely fell into Class 1 space. Mr. Sonnichsen stated that Chapter 8 was modified to reflect the direction that the 222-S Laboratory Complex took with their Chapter 8. All parties agreed that it was a good idea to revisit the certification requirements identified in Table 12-1. Ms. Ruud stated that she would review Table 12.1. Ms. Ruud stated that if Attachment 33 does not include any Class 2 or 3 modifications that there is no need to include Attachment 33 in the Public Comment package for Modification F.

ACTION: Tony Miskho, FH

For next meeting provide straw man for Table 12-1.

New Chapter 8's for Final Status Units – All

A discussion evolved from the description of the modifications to Attachment 33. Ms. Ruud stated that at the June 2000 meeting Ms. Ruud said to wait on modifying other final status unit chapters until the 222-S Laboratory Complex modifications to Chapter 8 have been finalized. Ms. Ruud stated that 222-S Laboratory workshop discussions on Chapter 8, do not match the 222-S Laboratory Complex Permit Application that was submitted to Ecology. Ms. Ruud said not to submit Chapter 8's using the 222-S Laboratory model for the Final Status units. Ms. Mattlin stated that during her telephone conversation with Ms. Ruud she agreed waiting to submit the Chapter 8's made sense. Ms. Mattlin stated that after speaking with Ms. Ruud she spoke with the projects and read project manager meeting minutes, which supported the submittal of the modified Chapter 8's. Ms. Mattlin stated that there are also some training plans that are out of date, and it did not make sense to update the plan and turn around and update it again to the 222-S Chapter 8 model. Ms. Mattlin stated that Ms. Ruud has directed the committee at previous meeting to work the issue through the unit/project manager, and that is exactly what the Final Status units did. Mr. Tilden, PNNL stated that 325 HWTUs has a commitment to Ecology to submit an updated Chapter 8. Mr. Tilden stated that 325 HWTUs had agreement with Greta Davis, Ecology and Jeanne Wallace, Ecology to modify the 325 HWTUs and the 305-B Storage Facility Chapter 8 using the 222-S model. Ms. Mattlin stated that Cathy Conaway, Ecology is also supportive of submitting Chapter 8's for 242-A Evaporator and LERF/ETF using the 222-S model. Ms. Mattlin asked Ms. Ruud for a meeting with all the players (unit managers, Ms. Ruud, and Ms. Mattlin) to resolve any issues concerning Final Status units (305-B Storage Facility, 325 HWTUS, PUREX Storage Tunnels, 242-A Evaporator, LERF/ETF) submitting Chapter 8's using the 222-S model for the October 10, 2000 quarterly Class 1 modification package. Ms. Ruud stated that she would meet with the Ecology unit managers to determine what has been agreed to on the Chapter 8 submittals using the 222-S model.

Status on TRUSAF Transition – Ellen Mattlin, DOE-RL

Ms. Mattlin stated that she spoke with the Tri-Party Agreement group on the status on TRUSAF. Ms. Mattlin stated that the June 1999 Agreement in Principle removed the requirement to submit the TRUSAF Closure Plan in June 1999, because of an agreement between agencies to begin transition. In an October 1999 transmittal the TRUSAF negotiations have been suspended indefinitely. This was due to negotiation priority, the parties saw no threat to human health and the environment, and the scope of the closure is unidentified. Ms. Ruud stated that she would further discuss this topic with Roger Stanley, Ecology.

Status of Part A Workshop – Ellen Mattlin, DOE-RL

Ms. Mattlin stated that the PCB workshop has taken most of her time, and that she has not schedule a Part A Workshop meeting. Ms. Ruud stated that Ecology is conducting an internal review to determine the amount of detail required on the Part A, Form 3. There was discussion that a Workshop would still be a good idea, but would be deferred until after the Ecology's review.

Other items:

Ms. Ruud announced that Ecology is looking at site impacts, lead by the Ecology Policy Team, Larry Goldstein. Two issues that have been identified for evaluation are:

MTCA Issues – Team will include Ecology, EPA, and the Department of Health, and is under development.

Interim Status Issues at Hanford –Team members: Dave Bartus, EPA; Greta Davis; Laura Ruud; Steve Skurla; Matt Mills; Tracy Ye; Jeanne Wallace, Suzanne Dahl, Shawna Berven, Alisa Huckaby, Bob Wilson, and someone from the Hazardous Waste Toxics Reduction Program, all of Ecology. Ms. Ruud stated that the team will look at the single facility and individual units, and what is interim status with a final status Permit. Ms. Ruud stated that the teams do not include DOE and their Contractors, but Ecology would provide a technical presentation prior to final issuance of the policy.

Next Meeting is scheduled for: **NOTE change in date and place of meeting.**

Tuesday, October 17, 2000, 1:00 P.M. – 3:00 P.M., 2355 Stevens, Conference Room 203

Agenda Items for October 17, 2000

1. Status of Modification E
2. Status of Modification F
3. What to do with TRUSAF – Laura Ruud, Ecology

Meeting Attendance

	Name	Phone	Project
1.	Michelle Anderson-Moore	736-5714	Ecology
2.	Roger Bowman	376-4876	FH-R&EC
3.	Fred Jamison	736-3022	Ecology
4.	Astrid Larsen	372-0477	DOE-RL
5.	Ellen Mattlin	376-2385	DOE-RL
6.	Tony McKarns	376-8981	DOE-RL
7.	Tony Miskho	376-7313	FH-ES
8.	Laura Ruud	736-5715	Ecology
9.	Jack Sonnichsen	376-9956	FH-ES
10.	Harold Tilden	376-0499	PNNL
11.	Suzette Thompson	372-0958	FH-ES
12.	Terry Winward	373-4002	BAT/DOE-ORP
13.	Donna Yasek	372-9331	BHI

Enclosure 3

(2 pages including cover)

Thurlow, Cynthia S

Subject: FW: Review of final status training plans

-----Original Message-----

From: Larsen, Astrid P

Sent: Friday, February 09, 2001 11:26 AM

-----Original Message-----

From: Ruud, Laura [mailto:LRUS461@ECY.WA.GOV]

Sent: Thursday, January 18, 2001 2:52 PM

To: 'Anthony_G_Miskho@rl.gov'; 'Astrid_P_Larsen@rl.gov';
'harold.tilden@pnl.gov'

Cc: Becker-Khaleel, Brenda

Subject: Review of final status training plans

I looked over the final status training plans that were recently submitted. Other than the omission of a matrix, they look fine. So, let's work on making the 222-S matrix a good model. You can then submit chapter 8 and their matrices for the final status units with the next set of quarterly mods. If this mod package looks OK, I'll send a letter saying that the mods will be approved contingent upon any comments received during the public comment period. Once the public comment period is over for Mod F, I will finalize the mods as soon as possible.

This should reflect what we agreed to this morning. Please confirm that you have the same understanding. Thanks.