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

01-FTD-024

MAR 29 2001

Mr. Rick Bond, Transition Project Manager
Nuclear Waste Program
State of Washington
Department of Ecology
1315 W. 4th Avenue
Kennewick, Washington 99336

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EDMC

Dear Mr. Bond:

HANFORD FEDERAL FACILITY AGREEMENT AND CONSENT ORDER (TRI-PARTY AGREEMENT) INTERIM MILESTONE M-89-02, COMPLETE REMOVAL OF 324 BUILDING RADIOCHEMICAL ENGINEERING CELLS (REC) B-CELL MIXED WASTE (MW) AND EQUIPMENT

- References: (1) Ecology ltr. to C. E. Clark, RL, from R. Bond, "Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) Interim Milestone M-89-02, Complete Removal of 324 Building Radiochemical Engineering Cells (REC) B-Cell Mixed Waste (WM) and Equipment, November 30, 2000," dtd. March 13, 2001.
- (2) Ecology ltr. to P. Knollmeyer, RL, from R. Bond, "324 Building Checklist and Confirmation of Missed Milestone M-89-02," dtd. February 1, 2001.
- (3) RL ltr. to M. A. Wilson, Ecology, from C. E. Clark, "Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) Interim Milestone M-89-02, Complete Removal of 324 Building Radiochemical Engineering Cells (REC) B-Cell Mixed Waste (WM) and Equipment, November 30, 2000," (01-FTD-010) dtd. December 21, 2000.

The U. S. Department of Energy, Richland Operations Office (RL) and RL contractor, Fluor Hanford, Inc. (FHI) are notifying the State of Washington Department of Ecology (Ecology) that the agreed upon scope of work for B-Cell cleanout, as described below, for Tri-Party Agreement Interim Milestone M-89-02 was completed March 22, 2001. RL committed to complete this scope by March 30, 2001, in a revised schedule provided in Reference (3). The original milestone date of November 30, 2000, was missed. The remaining scope of work for the non-mixed waste (non-MW) will be completed by July 31, 2001.

The enclosed Interim Milestone M-89-02 completion checklist, as supplemented by Reference (1), accurately describes the scope of work and activities required to complete M-89-02. RL appreciates the assistance provided by Ecology in developing the checklist and agreement to use

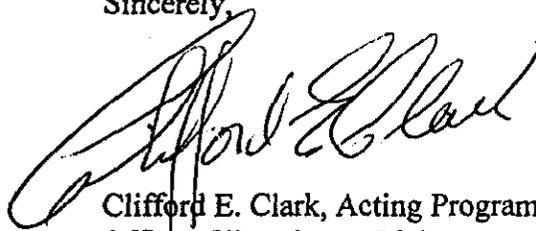
MAR 29 2001

the checklist as a tracking tool to monitor completion of M-89-02 workscope (Reference 2). The checklist systematically lists the performance measures, provides a record of the status of milestone completion, and provides a record of completion of the respective activities. The scope of work described in the checklist includes the total scope necessary to complete M-89-02. The checklist includes both the removal of all dispersible materials, excess equipment, and debris from B-Cell and shipment of the removed MW to suitable storage in the 200 Area by March 30, 2001, and the shipment of the remaining non-MW removed from B-Cell to suitable disposal or storage in the 200 Area by July 31, 2001.

Currently, two of 19 additional non-MW shipments have been completed. Shipments of the remaining non-MW removed from B-Cell are on schedule to meet the July 31, 2001, commitment.

If there are any questions, please contact me on (509) 376-9333, or your staff may contact David Langstaff, Facility Transition Division, on (509) 376-0254.

Sincerely,



Clifford E. Clark, Acting Program Manager
Office of Regulatory Liaison

FTD:DCL

Enclosure

cc w/encl:

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324 BUILDING TRI-PARTY AGREEMENT INTERIM MILESTONE M-89-02 CHECKLIST
SHOWING STATUS AS OF MARCH 23, 2001

The *Hanford Federal Facility Agreement and Consent Order* (Tri-Party Agreement) Interim Milestone M-89-02 is defined in Tri-Party Agreement Change Number M-89-98-03 (Reference 1 below) as "Complete removal of 324 Building REC B-Cell MW and Equipment." The M-89-98-03 change indicates that containerized mixed-waste (MW) will be managed in compliance with Chapter 173.303 WAC (*Washington Administrative Code, Dangerous Waste Regulations*), thereby reducing risks to human health and the environment. It also indicates that any remaining residues will be managed through the final closure process.

The checklist provided consists of a list of the actions and conditions described in the U.S. Department of Energy, Richland Operations Office (RL) letter number 00-FTD-006, "*Hanford Federal Facility Agreement and Consent Order* (Tri-Party Agreement) Interim Milestone M-89-02, Complete Removal of 324 Building REC B-Cell MW and Equipment, November 30, 2000" (Reference 2 below). The RL letter was submitted to the State of Washington Department of Ecology (Ecology) on December 08, 1999. The RL letter provided an attachment and a table to provide greater definition for the performance standards to be met by interim milestone M-89-02. Ecology concurred with RL letter 00-FTD-006 in a response letter (same subject) to RL, dated February 28, 2000 (Reference 3 below). Detailed B-Cell equipment information regarding useable deactivation equipment was provided in a one-page information handout at the May 18, 2000, Project Managers' Meeting (Reference 4 below). Ecology provided clarifications regarding the interim milestone M-89-02 in a one-page handout at the August 9, 2000, Project Managers' Meeting (Reference 5, Attachment 6, Ecology handout regarding use of 90-day MW accumulation area and clarifications regarding M-89-02 milestone performance standard). Note: The non-shaded areas in the checklist table will be used to provide status information for activities/measures.

References:

- 1) Tri-Party Agreement Change Number M-89-98-03, for *Hanford Federal Facility Agreement and Consent Order* (Tri-Party Agreement), regarding Milestone M-89-02, November 1998.
- 2) RL Letter No. 00-FTD-006, "*Hanford Federal Facility Agreement and Consent Order* (Tri-Party Agreement) Interim Milestone M-89-02, Complete Removal of 324 Building REC B-Cell MW and Equipment, November 30, 2000," dated December 08, 1999.
- 3) Ecology letter dated February 28, 2000, same subject as Reference 2.
- 4) 324 REC/HLV Project Managers' Meeting, May 18, 2000, Meeting Minutes, Attachment 4, List of Usable Deactivation Equipment, 324 Building, M-89-02, Detailed B-Cell Equipment Information, May 18, 2000.
- 5) 324 REC/HLV Project Managers' Meeting, August 9, 2000, Meeting Minutes.
- 6) RL Letter 01-FTD-014, "*Hanford Federal Facility Agreement and Consent Order* (Tri-Party Agreement) Interim Milestone M-89-02, Complete Removal of 324 Building Radiochemical Engineering Cells Mixed Waste (MW) and Equipment, November 30, 2000," dated February 23, 2001.

Action/Requirement/Conditions	Status (Complete (X) In Progress (P))	Status Statement	% Complete	Estimated Completion Date	Actual Completion Date	Documentation Completed
<p>1) First Distinct Action for M-89-02 (Reference 1): Mixed waste (MW) must be containerized, removed from B-Cell and placed in a condition that is compliant with Chapter 173.303 of the WAC</p> <p>Performance standard for First Distinct Action:</p> <ul style="list-style-type: none"> • Removal of MW from the Radiochemical Engineering Cells (REC) B-Cell requires the collection and containerization of dispersible material from the B-Cell • Collection will not include destructive and/or chemical methods (i.e., spalling or decontamination washes) so that a determination of liner integrity (closure activity required post M-89-02) can be made prior to liner decontamination • The dispersible material will be containerized in a compliant (with receipt facility acceptance criteria) container system • Containerized dispersible material will be removed from REC B-Cell and may be moved to an interim storage area 						
<p>Activity(s)/Measure(s): 1a Perform collection and containerization of dispersibles through retrieval with a pneumatic clamshell from the B-Cell floor (Reference 1)</p>	X	<p>Clamshelling of B-Cell floor has been completed. Clamshelling was performed after clearing and scraping the floor.</p>	100%		03/01/01	<p>Cell diagram and videotape</p>

Action/Requirement/Conditions	Status (Complete (X) In Progress (P))	Status Statement	% Complete	Estimated Completion Date	Actual Completion Date	Documentation Completed
<p>1b Following clamshelling (1a above), collect dispersibles by performing a filtered vacuum of the B-Cell floor (Reference 1) (NOTE: Invite Ecology to observe vacuuming and documentation.)</p>	X	<p>The crane-deployed vacuum system was installed in the B-Cell using existing 5000-lb block for fixture/stability, and vacuuming of the main B-Cell floor area was performed.</p> <p>The Dispersible Removal System (DRS) vacuuming unit was also installed in B-Cell and vacuuming of difficult areas was performed using the DRS.</p> <p>Vacuuming activities have been completed for all grid sections of the B-Cell floor.</p> <p>Vacuuming status was based on systematic grid approach using cell diagrams and video taping.</p> <p>Ecology was invited and observed vacuuming activities as appropriate in person, and on videotape.</p>	100%		03/01/01	Cell diagram and videotape

Action/Requirement/Conditions	Status (Complete (X) In Progress (P))	Status Statement	% Complete	Estimated Completion Date	Actual Completion Date	Documentation Completed
1c Transfer dispersibles collected by these methods into containers for interim storage (Reference 5, Section 5.6, directly loading MW dispersibles into rectangular grout containers))	X	<p>Transfer of dispersibles into rectangular grout containers (RGCs) has been completed for all seven (7) of the seven (7) expected dispersibles RGCs, which are as follows:</p> <p style="padding-left: 40px;">RGC-324-00-123 (RGC-5) RGC-324-00-114 (RGC-8) RGC-324-00-117 (RGC-9) RGC-324-00-101 RGC-324-00-102 RGC-324-00-119 RGC-324-00-115</p> <p>These RGCs contain some MW debris and MW equipment, but were tracked as dispersibles RGCs on this checklist.</p> <p>Loading of MW into RGC-324-00-115 has been completed.</p>	100%		03/01/01	Videotape

Action/Requirement/Conditions	Status (Complete (X) In Progress (P))	Status Statement	% Complete	Estimated Completion Date	Actual Completion Date	Documentation Completed
Activity(s)/Measure(s) (continued): 1d Move containerized dispersibles to a compliant mixed waste storage area (Reference 1)						
1d.1 Remove containerized MW dispersible material from B-Cell (Reference 1). -MW containers will be staged/moved to a 324 Building 90-day MW accumulation area after packaging and radiological survey. This provides waste management controls commensurate with WAC 173-303 dangerous waste accumulation requirements. Ecology concurrence (through enforcement discretion) is applicable for this activity since the MW is not newly generated (Reference 5).	X	The seven (7) dispersibles RGCs have been removed from B-Cell, including the following: RGC-324-00-123 (RGC-5) RGC-324-00-114 (RGC-8) RGC-324-00-101 RGC-324-00-102 RGC-324-00-117 (RGC-9) RGC-324-00-119 RGC-324-00-115	100%		03/08/01	Container loadout documentation

Action/Requirement/Conditions	Status (Complete (X) In Progress (P))	Status Statement	% Complete	Estimated Completion Date	Actual Completion Date	Documentation Completed
Id.2 Complete shipment (and receipt) of containerized MW dispersible material to 200 Area Central Waste Complex compliant MW storage area by 11/30/00 (Reference 5) ¹	X	Shipping has been completed for the seven (7) dispersibles RGCs, including the following: RGC-324-00-114 (10/09/00) RGC-324-00-123 (12/01/00) RGC-324-00-101 (01/09/01) RGC-324-00-102 (01/26/01) RGC-324-00-119 (02/01/01) RGC-324-00-117 (02/06/01) RCG-324-00-115 (03/22/01)	100%		03/22/01	Shipping papers/manifests

¹ Reference 5, Attachment 6, indicates that all collected mixed waste must be removed from the 324 Building B-Cell and placed in compliant, long-term storage in the 200 Area prior to the deadline established by M-89-02 (November 30, 2000).

Action/Requirement/Conditions	Status (Complete (X) In Progress (P))	Status Statement	% Complete	Estimated Completion Date	Actual Completion Date	Documentation Completed
2) Second Distinct Action for M-89-02 (Reference 1):						
<p>The second distinct action required under interim milestone M-89-02 requires the removal of excess equipment from the REC B-Cell</p> <p>Table attached to RL letter 00-FTD-006 provides all equipment currently within the REC B-Cell and defines "Excess" versus "Required" equipment</p> <p>Performance Standard for Second Distinct Action:</p> <ul style="list-style-type: none"> • Removal and containerization of all equipment (excluding Spent Nuclear Fuel) from B-Cell not required for the implementation of further closure actions and/or deactivation endpoints as established in the Closure Plan and the 324/327 Buildings integrated Project Management Plan (PMP), HNF-1289 • Excess equipment is defined in the attachment (pages 4-6) to RL letter 00-FTD-006, which provides the listing of B-Cell and a determination of its disposition status per M-89-02 						

Action/Requirement/Conditions	Status (Complete (X) In Progress (P))	Status Statement	% Complete	Estimated Completion Date	Actual Completion Date	Documentation Completed
Activity(s)/Measure(s): 2a Containerize following "Excess" equipment from B-Cell (Reference 1):						
2a.1 Rack 2A and remaining portions of previously size reduced racks	X	The last process rack, 2A, was size reduced in April 2000 and the last remnants (contained within non-MW grout containers) were relocated to A-Cell in June 2000. Containerization of remaining portions of racks was completed.	100%		02/02/01	Waste container contents and videotape
2a.2 2,265-kilogram steel block (NOTE: Per Reference 6, this item was recategorized as "required" equipment for future 324 REC closure and deactivation activities.)	See 2a.2 note	This item is also called the 5,000 lb block. This block has been incorporated as a fixture/stabilizer for the newly developed crane-deployed vacuuming system.	See 2a.2 note	See 2a.2 note	See 2a.2 note	Videotape
2a.3 Sump trench cover screen (east end of B-Cell floor)	X	Screen had been removed previously.	100%		02/27/01	Videotape

Action/Requirement/Conditions	Status (Complete (X) In Progress (P))	Status Statement	% Complete	Estimated Completion Date	Actual Completion Date	Documentation Completed
<p>2a.4 Waste containers (with contents requiring transfer into other containers) i.e., grout containers (GC) (non-MW), engineered containers (MW), and RGCs (MW). These include GC-88, GC-115, GC-120, RGC-0, and engineered containers in wagon wheel.</p>	X	<p>Disposition/repackaging of waste from all of the subject five (5) items has been completed, including:</p> <p style="padding-left: 20px;">GC-115 GC-120 GC-88 Wagon wheel EC dispersible RGC-0</p> <p><i>Repackaging of contents of RGC-0 was completed.</i></p> <p>All wagon wheel EC dispersibles have been loaded into RGCs.</p> <p>Two empty ECs remain in B-Cell.</p>	100%		02/22/01	Waste containers contents
<p>2a.5 Storage rack (wagon wheel holding engineered containers) used for Special-Case Waste and MW. (NOTE: Per Reference 6, this item was recategorized as "required" equipment for future 324 REC closure and deactivation activities.)</p>	See 2a.5 note	<p>This rack is needed to hold ECs during future 324 REC closure/deactivation activities.</p>	See 2a.5 note	See 2a.5 note	See 2a.5 note	See 2a.5 note

Action/Requirement/Conditions	Status (Complete (X) In Progress (P))	Status Statement	% Complete	Estimated Completion Date	Actual Completion Date	Documentation Completed
Activity(s)/Measure(s) (continued) 2b Remove containerized excess equipment designated as MW (in RGCs) from B-Cell (Reference 1).	X	The lead shield plugs have been removed from B-Cell. All three (3) of the three (3) expected MW equipment RGCs have been removed from B-Cell, including the following: RGC-324-00-083 (RGC-4) RGC-324-00-103 (RGC-6) RGC-324-00-104	100%		01/15/01	Waste containers contents
2c Ship containerized excess equipment designated as MW (in RGCs/SWDBs) to 200 Area by 11/30/00 (Reference 5) ² .	X	Shipping has been completed for the three (3) steel waste disposal boxes (SWDBs) containing MW equipment RGCs, including the following: RGC-324-00-083 (09/28/00) RGC-324-00-103 (09/30/00) RGC-324-00-104 (01/15/01)	100%		01/15/01	Shipping papers/manifest

² Reference 5, Attachment 6, indicates that all collected mixed waste must be removed from the 324 Building B-Cell and placed in compliant, long-term storage in the 200 Area prior to the deadline established by M-89-02 (November 30, 2000).

Action/Requirement/Conditions	Status (Complete (X) In Progress (P))	Status Statement	% Complete	Estimated Completion Date	Actual Completion Date	Documentation Completed
2d Remove containerized excess equipment designated as non-MW (in grout containers) from B-Cell (to be staged in A-Cell) by 11/30/00 (Reference 5) ³ .	P	<p>Thirty-seven (37) of the thirty-eight (38) expected grout containers filled with non-MW excess equipment have been removed from B-Cell. One partially filled GC remains in B-Cell (as agreed to by Ecology during 324 Building visit/meeting conducted on February 8, 2001).</p> <p>Eighteen (18) of these containers are staged in the 324 Building A-Cell, awaiting future shipment. Containerization of non-MW is complete, but one container (GC-88) remains in B-Cell until other REC non-MW can be used to fill it completely.</p>	97%			
2e Ship excess equipment designated as non-MW (in grout containers) to 200 Area storage by 7/31/01 (Reference 5) ³	P	Nineteen (19) of the thirty-eight (38) expected grout containers filled with excess equipment have been shipped to 200 Area storage.	50%			

³ Reference 5, Attachment 6, indicates that the non-mixed waste (grout containers) removed from B-Cell (and stored/staged in A-Cell) will be moved to compliant, long-term storage in the 200 Area. Reference 5 indicates that the deadline for this activity will appear as a DOE (RL) milestone for the next fiscal year (2001) and will occur within eight months after the completion date required by Tri-Party Agreement Milestone M-89-02 (i.e., within eight months after November 30, 2000).

Action/Requirement/Conditions	Status (Complete (X) In Progress (P))	Status Statement	% Complete	Estimated Completion Date	Actual Completion Date	Documentation Completed
2f Following "Required" equipment to remain in B-Cell to support closure activities (Reference 1): <ul style="list-style-type: none"> • Cell penetration plugs • West window work tray • 10-ton crane (overhead crane) • 3-ton crane (overhead crane) • Two temporary fuel storage racks⁴ • Fuel pin storage container (gattling gun)⁴, west wall • Fuel thimbles⁴, west side of B-Cell in fuel storage racks • Installed electrostatic precipitators and HEPA (particulate) filters, north wall • Installed manipulators • Empty grout containers, lids, engineered containers, RGCs • Usable deactivation equipment including following (References 1 and 4): <ul style="list-style-type: none"> • Fire protection hoses and nozzles (needed for fire protection) • Installed and functioning camera systems, including pan/tilt heads, mounts, etc. (needed for size reduction of fuel storage equipment, as well as cleanout of pipe trench and D-Cell) (Continued on next page)						

⁴ SNF currently stored within B-Cell will remain in B-Cell pending availability of the 200 Area Interim Storage Area (ISA). This is a delay in the removal of the fuel out of B-Cell. The former schedule had an interim movement of this fuel out of B-Cell and into A-Cell pending availability of the ISA. The project will benefit by eliminating this interim move within the facility and result in an earlier shipment of SNF out of the 324 Building, and allow for an overall better sequencing of closure activities within the 324 Building.

Action/Requirement/Conditions	Status (Complete (X) In Progress (P))	Status Statement	% Complete	Estimated Completion Date	Actual Completion Date	Documentation Completed
<ul style="list-style-type: none"> • Useable deactivation equipment (continued) <ul style="list-style-type: none"> • Fixed and portable lights (needed for viewing the cell) • Jib crane (accompanies 3-ton crane) and auxiliary hooks for 10-ton and 3-ton cranes (needed for fuel pin consolidation and size reduction of fuel storage equipment) • Torches and cables (needed for size reduction of fuel storage equipment) • Clamshells (needed for removal of size reduced fuel storage equipment as well as cleanout of pipe trench and D-Cell) • Dispersibles Removal System (DRS) attachments (needed for cleanout of D-Cell particulate material) • Vacuum system and hoses (needed for cleanout of D-Cell and pipe trench material) • Extension cords and cables (needed for operating installed equipment including electrostatic precipitators, portable lights, cameras, and DRS system) • Labounty shear (needed for size reduction of fuel storage rack) (NOTE: Per discussions with Ecology and RL at the 02/08/01 visit/meeting at the 324 Building, the Labounty shear is being recategorized as "excess" equipment, and has been packaged in a grout container.) • Rinsing equipment (needed to support future deactivation packaging and loadout of low-level waste and transuranic waste materials and equipment into 3-82B grout containers) • Grouting equipment (needed for grouting future low-level; waste 3-82B grout containers) 						

Action/Requirement/Conditions	Status (Complete (X) In Progress (P))	Status Statement	% Complete	Estimated Completion Date	Actual Completion Date	Documentation Completed
<p>Useable deactivation equipment (continued)</p> <p>Per Reference 6, the following recently developed items were added to the "required" useable deactivation equipment:</p> <ul style="list-style-type: none"> • RODC lifting fixture (for lifting/handling future RODCs) • Band saw (for size reduction of REC equipment) • Chop saw (for size reduction of REC equipment) • Bigelow scraper (for REC floor cleaing) • Wagon wheel (a web assembly used to keep engineered containers vertical for filling) • Crane deployed vacuum system (integral of which is the 5000 lb block). 						
<p>3) Third Distinct Action (Reference 1):</p>						
<p>Removal of debris from B-Cell</p> <p>Performance Standard for Third Distinct Action:</p> <ul style="list-style-type: none"> • <i>Miscellaneous debris</i> (i.e., tools, metal scrap, manipulator boots) located on B-Cell floor will be removed from B-Cell and packaged for removal • <i>Packaged debris</i> will be removed from the REC B-Cell 						
<p>Activity(s)/Measure(s): 3a Collect debris from B-Cell (Reference 1)</p>	X	<p>Debris was collected using clamshelling method. Clamshelling activities have been completed.</p>	100%		03/01/01	<p>Cell diagram and videotape</p>

Action/Requirement/Conditions	Status (Complete (X) In Progress (P))	Status Statement	% Complete	Estimated Completion Date	Actual Completion Date	Documentation Completed
3b Rinse and package debris consistent with the size-reduced equipment removed from B-Cell (Reference 1)						
Activity(s)/Measure(s) (continued): 3b.1 Containerize non-MW debris using cylindrical Grout Containers (GCs) (Reference 5):	X	Containerization of non-MW debris into cylindrical GC has been completed.	100%		02/23/01	Cell diagram and videotape
3b.2 Containerize MW debris using Rectangular Grout Containers (RGCs) (Reference 5):	X	Containerization of MW debris (by clamshelling, Section 3a) has been completed. The MW debris was containerized into the RGCs addressed in Section 1a (MW dispersibles) and Section 2b (MW excess equipment) for packaging efficiency reasons.	100%		03/01/01	Cell diagram and videotape
3c Remove containerized debris from B-Cell (Reference 1)						

Action/Requirement/Conditions	Status (Complete (X) In Progress (P))	Status Statement	% Complete	Estimated Completion Date	Actual Completion Date	Documentation Completed
Activity(s)/Measure(s) (continued): 3c.1 Remove containerized non-MW debris (GCs) from B-Cell (to be staged in A-Cell) by 11/30/00 (Reference 5) ⁵	P	Non-MW debris has been containerized into the same GCs addressed in Section 2d (non-MW excess equipment) for packaging efficiency reasons. Thirty-seven (37) of the thirty-eight (38) expected non-MW GCs have been removed from B-Cell. Eighteen (18) of these are staged in A-Cell, awaiting future shipment. Containerization is complete, but GC-88 removal will be performed after other REC non-MW is used to fill it completely. (See 2d.)	97%			Waste containers contents
3c.2 Remove containerized MW debris (RGCs) from B-Cell by 11/30/00 (Reference 5)	X	All seven (7) of the expected seven (7) dispersibles RGCs (Section 1.d.1) have been removed from B-Cell.	100%		03/08/01	Waste loadout documentation
3d Ship containerized debris to 200 Area compliant storage (Reference 1)						
3d.1 Ship containerized non-MW debris (GCs in liner assembly/3-82 B cask) to 200 area compliant storage by 7/31/01 (Reference 5) ⁵ . Approximately five of the GCs will be categorized as low-level waste and are expected to therefore require grouting (in B-Cell) prior to shipment.	P	Nineteen (19) of the expected thirty-eight (38) non-MW GCs (Section 2e) have been shipped to 200 Area storage.	50%			Shipping papers

⁵ Reference 5, Attachment 6, indicates that the non-mixed waste (grout containers) removed from B-Cell (and stored/staged in A-Cell) will be moved to compliant, long-term storage in the 200 Area. It also indicates that the deadline for this activity will appear as a DOE milestone for the next fiscal year (2001) and will occur within eight months after the completion date required by Tri-Party Agreement Milestone M-89-02 (i.e., within eight months of November 30, 2000).

Action/Requirement/Conditions	Status (Complete (X) In Progress (P))	Status Statement	% Complete	Estimated Completion Date	Actual Completion Date	Documentation Completed
3d.2 Ship containerized MW debris (RGCs in Rectangular Overpack Disposal Container / Steel Waste Disposal Box, SWDB) to 200 Area compliant storage by 11/30/00 (Reference 5) ⁶	X	All seven (7) of the expected seven (7) dispersibles RGCs (Section 1.d.2) have been shipped to CWC.	100%		03/22/01	Shipping papers/manifest

⁶ Reference 5, Attachment 6, indicates that all collected mixed waste must be removed from the 324 Building B-Cell and placed in compliant, long-term storage in the 200 Area prior to the deadline established by M-89-02 (November 30, 2000).

324 BUILDING B-CELL INTERIM MILESTONE M-89-02 WASTE SUMMARY

Steps	(1) Papers/Plas		(2) Excess Equipment		(3) Debris	
	MW	Non-MW	MW	Non-MW	MW	Non-MW
Collect waste	X	-	-	-	X	X
Containerize	X	-	X	X	X	X
Remove/Stage	X	-	X	X	X	X
Ship containers	X	-	X	X	X	X

Ref. 1
54828



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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

March 13, 2001

Mr. Clifford E. Clark, Acting Program Manager
Office of Regulatory Liaison
United States Department of Energy
Richland Operations Office
P.O. Box 550, MSIN: A5-15
Richland, Washington 99352

Dear Mr. Clark:

Re: Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement)
Interim Milestone M-89-02, Complete Removal of 324 Building Radiochemical
Engineering Cells (REC) B-Cell Mixed Waste (WM) and Equipment, November 30,
2000

The Washington State Department of Ecology (Ecology) has received your letter, dated February 23, 2001, which addresses the need to retain several pieces of equipment that have been developed, used, and found to be suitable for future deactivation activities. These items are as follows:

- Rectangular Overpack Disposal Container (RODC) Lifting Fixture (Spreader Bar);
- Band Saw;
- Chop Saw;
- Bigelow Scraper;
- Wagon Wheel; and
- Crane Deployed Vacuum System.

Although these items were not specifically identified in the previous listing of remaining equipment, your statement of justification for keeping them provided sufficient information for Ecology to concur with your need to maintain those pieces of equipment for future deactivation work.

This concurrence is contingent upon receipt of an Ecology approved plan and schedule for removal of the remaining equipment (excluding cranes and manipulators) within ninety (90) days of receipt of this letter.

RECEIVED

**MAR 15 2001
DOE RL/CCC**

Mr. Clifford E. Clark
March 13, 2001
Page 2

If you have any questions, please feel free to contact me at (509) 736-3007, or Deborah Singleton at (509) 736-5722.

Sincerely,



Rick Bond, Transition Project Manager,
Nuclear Waste Program

RB:sb

cc: David Templeton, USDOE
Roger Bowman, FH
David Rasmussen, FH
Todd Martin, HAB
J.H. Richards, CTUIR
Pat Sobotta, NPT
Russell Jim, YN
Mary Lou Blazek, OOE
Administrative Record: Transition & Milestone M-89-02/324 REC

Ref 2
54331



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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

February 1, 2001

Mr. Peter Knollmeyer
United States Department of Energy
P.O. Box 550, MSIN: A5-11
Richland, Washington 99352

Dear Mr. Knollmeyer:

Re: 324 Building Checklist and Confirmation of Missed Milestone M-89-02

A checklist of the actions and conditions to be met by interim milestone M-89-02, *Complete Removal of 324 Building REC B-Cell Mixed Waste (MW) and Equipment*, was submitted to the Washington State Department of Ecology (Ecology) on August 23, 2000. The checklist provides greater definition of milestone performance standards as set forth in the United States Department of Energy (USDOE) letter number 00-FTD-006 dated December 8, 1999, Ecology's letter of concurrence dated February 28, 2000, and clarification handout from the August 9, 2000, Project Manager meeting.

Ecology has reviewed the checklist and concurs that the checklist incorporates definitions of performance as set forth in the above documents. The checklist organized performance measures and actions to be taken to meet milestone M-89-02 in concise tables and provides Ecology and USDOE with a tracking system.

If you have any questions or concerns regarding this letter, please feel free to contact me at (509) 736-3007.

Sincerely,

Rick Bond, Transition Project Manager
Nuclear Waste Program

RB:sb .

cc: Cliff Clark, USDOE
David Langstaff, USDOE
David Templeton, USDOE
Roger Bowman, FH
Bill Burke, CTUIR

Pat Sobotta, NPT
Russell Jim, YN
Mary Lou Blazek, OOE
Administrative Record: M-89-02, 324 Bldg., B-Cell

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FEB 06 2001

DOE-RL/RLCC

54323
Ref. 3



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

DEC 21 2000

01-FTD-010

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

Dear Mr. Wilson:

HANFORD FEDERAL FACILITY AGREEMENT AND CONSENT ORDER (TRI-PARTY AGREEMENT) INTERIM MILESTONE M-89-02, COMPLETE REMOVAL OF 324 BUILDING RADIOCHEMICAL ENGINEERING CELLS (REC) B-CELL MIXED WASTE (MW) AND EQUIPMENT, NOVEMBER 30, 2000

The U.S. Department of Energy, Richland Operations Office (RL) and Fluor Hanford, Inc. (FHI) are providing the State of Washington Department of Ecology (Ecology) the enclosed recovery schedule for Tri-Party Agreement Interim Milestone M-89-02. The recovery schedule supports the FHI developed Milestone Recovery Plan for M-89-02 referenced in my previous letter (01-FTD-006) to you on this subject dated November 8. RL and FHI included your staff in the development of the recovery plan before providing the revised schedule.

The schedule shows that shipment of mixed waste associated with M-89-02 to the 200 Area will be completed by March 30, 2001, and shipment of non-mixed waste associated with M-89-02 to the 200 Area will be completed by July 31, 2001. The schedule for repair and maintenance of the 30-ton crane appears first on the schedule because the annual maintenance is required in December 2000 and the crane must be operable and available to support shipment of all waste from B-Cell out of the 324 Building. Availability of the B-Cell, airlock, and cask-handling area cranes is essential to moving B-Cell waste out of the 324 Building and to maintaining the recovery schedule. Another key factor potentially limiting shipments of mixed waste to the 200 Area is the weather; the operational controls on the packaging require ambient air temperature to be greater than 32°F because of the package material.

The M-89-02 milestone commitment to the November 30, date was established in November 1998 in Tri-Party Agreement Change Number M-89-98-03. Since that time, the 324 Building project team has continually worked to overcome a number of technical, administrative, work force, and schedule challenges to sustain progress toward meeting M-89-02. In spite of these aggressive efforts often made at a cost of personal sacrifice by the staff, recent delays caused by various technical difficulties, operational concerns, and equipment malfunctions have resulted in the project being behind schedule. Building on this experience, FHI has developed the enclosed recovery schedule using realistic work planning assumptions that now consider the uncertainties concerning equipment availability, overtime scheduling, conduct of operations improvements, and technical challenges.

Mr. Michael A. Wilson
01-FTD-010

-2-

DEC 21 2000

If you have any questions, please contact me on (509) 376-9333, or your staff may contact David C. Langstaff, Facility Transition Division, on (509) 376-5580.

Sincerely,



Clifford E. Clark, Acting Program Manager
Office of Regulatory Liaison

FTD: DCL

Enclosure

cc w/encl.:

M. L. Blazek, OOE
F. W. Bond, Ecology
R. F. Stanley, Ecology
N. C. Boyter, FHI
J. S. Hertzell, FHI
W. Burke, CTUIR
R. Jim, YN
M. B. Reeves, HAB
P. Sobotta, NPT
D. Sherwood, EPA
Administrative Record
Ecology Library, Kennewick
Environmental Portal, LMSI

Activity ID	Activity Description	Early Start	Scheduled Finish	FY01									FY02		
				OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP
Recovery Schedule															
M89A	30 Ton Crane	01DEC00*	08JAN01	██████████ 30 Ton Crane											
M89C	B-Cell Mixed Waste Cleanout M-89-02	09JAN01	30MAR01	▼ ██████████ B-Cell Mixed Waste Cleanout M-89-02											
M89B	Complete 3-82B Shipments	02APR01	31JUL01	▼ ██████████ Complete 3-82B Shipments											

Start Date 01SEP00 M89A
 Finish Date 31JUL01
 Data Date 01SEP00
 Run Date 21DEC00 15:12

Tri-Party Agreement
Interim Milestone
M-89-02

Sheet 1 of 1

Recovery Schedule

Mr. Michael A. Wilson
01-FTD-010

DEC 21 2000

If you have any questions, please contact me on (509) 376-9333, or your staff may contact David C. Langstaff, Facility Transition Division, on (509) 376-5580.

Sincerely,

ORIGINAL SIGNED BY

Clifford E. Clark, Acting Program Manager
Office of Regulatory Liaison

FTD: DCL

Enclosure

cc w/encls.:

- M. L. Blazek, OOE
- F. W. Bond, Ecology
- R. F. Stanley, Ecology
- N. C. Boyter, FHI
- J. S. Hertzell, FHI
- W. Burke, CTUIR
- R. Jim, YN
- M. B. Reeves, HAB
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- Administrative Record
- Ecology Library, Kennewick
- Environmental Portal, LMSI

bcc: FTD OFF File

- FTD Rdg File
- K. D. Bazzell, FTD
- D. E. Evans, FTD
- D. C. Langstaff, FTD
- K. L. Williams, FTD
- G. A. Williams, RCA
- D. W. Templeton, FTD
- S. L. Sailor, FTD
- J. K. Yerxa, RCD
- B. D. Williamson, OCC
- P. K. Kruger, DMST
- K. M. Hintzen, AMNM
- W. W. Ballard, AMI
- M. K. Marvin, IPI
- S. H. WISNESS, RCA

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DOE-RL/RLCC

Record Note: The recovery schedule is very brief and high level, similar to the schedule RL originally provided for the 324 REC/HLV closure plan (Letter 98-EAP-276 dated June 5, 1998) and approved by Ecology. The body of this letter includes some background for Ecology management to better understand the very brief recovery schedule and factors affecting it. RL and Ecology are proceeding without RL submitting a change request for M-89-02.

Office >	FTD	FTD	FTD	OCC	IPI	AMNM
Surname >	LANGSTAFF	BAZZELL	EVANS	HOLLOWELL	MARVIN	AUGUSTENBORG
Date >			PREV.	Conclur		
Office >	RCA	RCA				
Surname >	WISNESS	CLARK				
Date >	12/21/00	12/21/2000				

Mr. Michael A. Wilson
01-FTD-010

-2-

If you have any questions, please contact me on (509) 376-9333, or your staff may contact David C. Langstaff, Facility Transition Division, on (509) 376-5580.

Sincerely,

Clifford E. Clark, Acting Program Manager
Office of Regulatory Liaison

FTD: DCL

Enclosure

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Office >	RCA					
Surname >	CLARK	WISHES				
Date >						

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Mr. Michael A. Wilson
01-FTD-010

-2-

If you have any questions, please contact me on (509) 376-9333, or your staff may contact David C. Langstaff, Facility Transition Division, on (509) 376-5580.

Sincerely,

Clifford E. Clark, Acting Program Manager
Office of Regulatory Liaison

FTD: DCL

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Date >	12/21/00	12/21/00	12/21/00	12/21/00		12/21/00
Office >	RCA					
Surname >	CLARK	WISSNESS				
Date >						

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Mr. Michael A. Wilson
01-FTD-010

-2-

If you have any questions, please contact me on (509) 376-9333, or your staff may contact David C. Langstaff, Facility Transition Division, on (509) 376-5580.

Sincerely,

Clifford E. Clark, Acting Program Manager
Office of Regulatory Liaison

FTD: DCL

Enclosure

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Date >	12/21/00	12/21/00	12/21/00		12/21/00	12/21/00
Office >	RCA	OSS				
Surname >	CLARK	WILSON				
Date >						

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Document No. 24798

Mr. Rick Bond
01-FTD-024

-2-

MAR 29 2001

the checklist as a tracking tool to monitor completion of M-89-02 workscope (Reference 2). The checklist systematically lists the performance measures, provides a record of the status of milestone completion, and provides a record of completion of the respective activities. The scope of work described in the checklist includes the total scope necessary to complete M-89-02. The checklist includes both the removal of all dispersible materials, excess equipment, and debris from B-Cell and shipment of the removed MW to suitable storage in the 200 Area by March 30, 2001, and the shipment of the remaining non-MW removed from B-Cell to suitable disposal or storage in the 200 Area by July 31, 2001.

Currently, two of 19 additional non-MW shipments have been completed. Shipments of the remaining non-MW removed from B-Cell are on schedule to meet the July 31, 2001, commitment.

If there are any questions, please contact me on (509) 376-9333, or your staff may contact David Langstaff, Facility Transition Division, on (509) 376-0254.

Sincerely,

ORIGINAL SIGNED BY

Clifford E. Clark, Acting Program Manager
Office of Regulatory Liaison

FTD:DCL

Enclosure

cc w/encl:

M. L. Blazek, Oregon Energy
N. C. Boyter, FHI
J. S. Hertz, FHI
R. Jim, YN
O. S. Kramer, FHI
T. M. Martin, HAB
J. H. Richards, CTUIR
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K. V. Clarke, IPI
D. T. Evans, FTD
D. C. Langstaff, FTD
G. A. Williams, RCA

ORL Rdg File
RCA Rdg File

G Villegas, RCA

RECORD NOTE: In April, David Langstaff and representatives from OPE and AMI plan to conduct an independent verification of the checklist documentation that supports completion of the subject M-89-02 workscope. A single Grout Container partially loaded with non-mixed waste will remain in B-Cell until files; it will be shipped to the 200 Area by July 31, 2001, consistent with direction provided in the letter (01-ftd-020, dated March 22, 2001).

K:/Shona/Dave L./01-FTD-0024

Office >	FTD	FTD	AMNM	OCC	IPI	RCA
Surname >	LANGSTAFF	EVANS	AUGUSTENBORG	HOLLOWELL	MARVIN	HEBDON
Date >	3/29/01	3/29/01	3/29/01	PREV.	CONCLT.	3/29/01
Office >	RCA					
Surname >	CLARK					
Date >	3/29/01					

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