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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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December 18, 2002

Mr. Joel Hebdon, Director
Regulatory Compliance and Analysis Division
Richland Operations Office
United States Department of Energy
P.O. Box 550; MSIN: A5-15
Richland, Washington 99352

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Dear Mr. Hebdon:

Re: Letter dated December 11, 2002, from Joel Hebdon (USDOE) to Fredrick Bond (Ecology) regarding the completion of Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) Milestone M-094-02

Letter dated November 5, 2002, from Joel Hebdon (USDOE) to Fredrick Bond (Ecology) regarding the completion of Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) Milestone M-094-02, Amendment to 324 Building Radiochemical Engineering Cells, High-Level Vault, Low-Level Vault and Associated Areas Closure Plan, Revision 1

Because the scope of the amendment to the 324 Building Radiochemical Engineering Cells, High-Level Vault, Low-Level Vault and Associated Areas Closure Plan, Revision 1 is limited to components of the 324 Building requiring closure, the Washington State Department of Ecology (Ecology) accepts the United States Department of Energy (USDOE) revision to the original amendment submitted in the November 5, 2002, correspondence. The original amendment contained a statement, "All material removed from the building will be required to be managed in accordance with WAC 173-303-610 (5)." This statement is changed to "Any dangerous waste materials generated during closure activities will be managed in accordance with WAC 173-303-610 (5)."

Submission of this amendment fulfills Milestone M-094-02. Closure performance standards are changed from clean closure in accordance with the Debris Rule "clean debris surface" to "removal". The closure plan will require revision to reflect the removal actions summarized in Table 6-1A of this amendment. Ecology does not expect the incorporation of this amendment

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into the existing closure plan to be a major revision, but rather a minor modification to the existing closure plan. The revision shall be performed in accordance with the existing 324 Building Radiochemical Engineering Cells, High-Level Vault, Low-Level Vault Areas Closure Plan, Revision 1 (DOE/RL-96-73) and Washington Administrative Code (WAC) 173-303-610 (3). All closure activities must be conducted and certified in accordance with the approved closure plan. Please submit the revised closure plan to Ecology for review and approval by January 31, 2004.

The Tri-Party Agreement Milestone M-89-00 commitment is to complete closure of the non-permitted mixed waste units in the 324 Building as described in the Closure Plan (DOE/RL-96-73). The major areas addressed by this milestone are specified in Table 6-1 of the closure plan and require removal by October 31, 2005. This amendment modifies Table 6-1 to Table 6-1A, enclosed. Due to the changes made by this amendment, the completion date for Milestone M-89-00 needs to be modified to coincide with the date for complete disposition of the 324 Building. Milestone M-94-03 sets the date for complete disposition of the 324 building as September 30, 2010. Please submit the revised Tri-Party Agreement Milestone M-89-00 change package in conjunction with the revised closure plan by January 31, 2004.

If you have any questions, please contact Jeanne Wallace at 736-3019.

Sincerely,



Fredrick Bond
Transition Project Manager
Nuclear Waste Program

FB:JW:lkd

Enclosure

cc: Nick Ceto, EPA
Ellen Dagan, USDOE
John Sands, USDOE
Jon Perry, FHI
Stuart Harris, CTUIR
Donna Powaukee, NPT
Russell Jim, YN
Ken Niles, OOE
Administrative Record

The closure plan will require revision in accordance with this amendment. The closure plan text will be revised to reflect the removal actions presented in Table 6-1A. Revision will be reviewed and approved by Ecology. All closure activities must be conducted and certified in accordance with the approved closure plan. Table 6-1 was revised generating Table 6-1A. Table 6-1A will replace Table 6-1 in revision of the closure plan.

Table 6-1A. Closure Performance Standards and Activities for Areas Undergoing Closure.

| Area | Components | Closure Performance Standard | Closure Activities |
|---------|--|---|---|
| A-Cell | No closure activities required. | <ul style="list-style-type: none"> • Piping removal (under A-Cell) • Piping in place (embedded in walls) will be removed. | <ul style="list-style-type: none"> • HLV piping in A-Cell crawl space will be removed. • Closure of soil in the crawlspace below the piping is covered under Soil/ Groundwater. |
| B-Cell | Cell contents (excess equipment, debris, and dispersibles), liner, and concrete. | <ul style="list-style-type: none"> • Removal of all mixed waste and excess equipment. • Remove liner. <p>Note: HLV piping in B-Cell will be removed. Soil under B-Cell is covered under Soils/Groundwater.</p> | <ul style="list-style-type: none"> • In-cell excess equipment, debris, and dispersibles (including all mixed waste) will be removed. • Remove liner and concrete. |
| C-Cell | No closure activities required. | Not applicable. | Not applicable. |
| D-Cell | Waste container storage area; HLV liquid treatment process equipment area. | <ul style="list-style-type: none"> • Removal of all mixed waste and equipment (Chapter 3.0, Section 3.3). • Remove liner. <p>Note: HLV piping in D-Cell will be removed. Soil under D-Cell is covered under Soil/Groundwater.</p> | <ul style="list-style-type: none"> • Document visual inspection of waste container storage area. • Document visual inspection of equipment area. • Remove all equipment following any use during closure activities. <p>Remove liner and concrete.</p> |
| Airlock | Piping from HLV | <ul style="list-style-type: none"> • Remove piping. <p>Note: HLV piping in the airlock will be removed.</p> | <ul style="list-style-type: none"> • Remove all piping. |

Table 6-1A. Closure Performance Standards and Activities for Areas Undergoing Closure.

| Area | Components | Closure Performance Standard | Closure Activities |
|----------------------------|---|---|--|
| Pipe trench | Piping from HLV | <ul style="list-style-type: none"> Remove piping. Removal of all mixed waste (if present) <p>Note: HLV piping in the pipe trench will be removed.</p> <p>Soil under the pipe trench is covered under Soils/Groundwater.</p> | <ul style="list-style-type: none"> Remove all piping. Remove all waste/debris. Remove pipe trench and concrete. <p>Note: In-cell debris will be designated and disposed appropriately as either mixed waste or low-level waste.</p> |
| Other REC components | Piping from HLV | <ul style="list-style-type: none"> Remove piping. <p>Note: HLV piping in the cell cubicles and pass-through ports will be removed.</p> | <ul style="list-style-type: none"> Remove all piping. |
| HLV | Four tanks, piping, liner, concrete. | <ul style="list-style-type: none"> Removal of all mixed waste and equipment. Remove liner. <p>Note: HLV piping will be removed.</p> <p>Soil under HLV is covered under Soil/Groundwater.</p> | <ul style="list-style-type: none"> Tank heels, ancillary equipment, and the tanks will be removed. Remove vault liner and concrete. |
| LLV | Four tanks, piping, liner, concrete. | <ul style="list-style-type: none"> Removal of all potential mixed waste and equipment. Remove tanks, piping, liner, and concrete. <p>Note: LLV piping will be removed.</p> <p>Soil under the LLV is covered under Soil/Groundwater.</p> | <ul style="list-style-type: none"> Tank heels, ancillary equipment, and the tanks will be removed. Remove tanks, piping, liner, and concrete. |
| HLV sample room (Room 145) | Piping from HLV and LLV | <ul style="list-style-type: none"> Remove piping. <p>Note: HLV piping in the HLV sample room will be removed.</p> | <ul style="list-style-type: none"> Remove all piping. Removed piping will be treated to meet debris rule standards or will be handled as mixed waste. |
| Piping systems | Piping from REC Cells and the HLV and LLV | <ul style="list-style-type: none"> Remove all piping. Remove pipe runs. | <ul style="list-style-type: none"> Remove all piping. |

Table 6-1A. Closure Performance Standards and Activities for Areas Undergoing Closure.

| Area | Components | Closure Performance Standard | Closure Activities |
|----------------------|---|---|--|
| Cask-handling area | None. | Not applicable. | Not applicable. |
| Truck lock | None. | Not applicable. | Not applicable. |
| EDL-146 | Piping from HLV and LLV. | <ul style="list-style-type: none"> Remove piping. <p>Note: HLV/LLV piping in EDL-146 will be removed.</p> | <ul style="list-style-type: none"> Remove all piping. |
| Galleries | Piping from HLV and LLV. | <ul style="list-style-type: none"> Remove piping. <p>Note: HLV piping in the HLV sample room will be removed.</p> | <ul style="list-style-type: none"> Remove all piping. |
| Room 18 | Piping from HLV/LLV and potentially contaminated concrete | <ul style="list-style-type: none"> Remove piping. Prepare sampling and analysis plan (if needed). Implement debris rule alternative treatment standards (if needed). Remove HLV/LLV piping and contaminated concrete in Room 18. <p>Note: HLV/LLV piping in Room 18 will be removed</p> | <ul style="list-style-type: none"> Document visual inspection of Room 18, B-Cell service plug area. Sample to define nature and extent of contamination. Remove contaminated concrete. Remove piping. |
| Soil and Groundwater | Potentially contaminated soil. | <ul style="list-style-type: none"> Localized soil contamination (if any) will be removed to clean closure standards Widespread soil contamination will be coordinated with the soil and groundwater remediation planned for the CERCLA operable units | <ul style="list-style-type: none"> Potentially contaminated soil will be characterized to define nature and extent of contamination. Localized contamination will be removed and disposed as mixed waste. For widespread contamination, a contaminant of concern list will be developed so that future CERCLA investigation and cleanup actions can be coordinated. |