

Meeting Minutes – Approval

M-026 LDR Report Project Manager Meeting Minutes

at

2420 Stevens Center, Conference Room 224

Richland, Washington

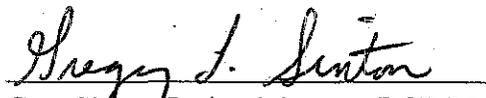
Meeting Held July 27, 2005

9:30 am to 11:30 am

RECEIVED
AUG 31 2005

EDMC

The undersigned indicate by their signatures that these meeting minutes reflect the actual occurrences of the above dated meeting. Signatures denote concurrence with content only and do not imply agreement or commitments.


Greg Sinton, Project Manager, DOE-RL

Date: 8/24/05


Woody Russell, Project Manager, DOE-ORP

Date: 8/24/05


Deborah Singleton, Project Manager, Washington State Department of Ecology

Date: 8/24/05

Contractor Concurrence


Anthony Miskho, LDR Report Coordinator, FH

Date: 8/24/05

Purpose: Discuss LDR Report related topics

The attached minutes are comprised of the following:

Attachment 1 - Meeting Agenda

Attachment 2 - Attendance List

Attachment 3 - Actions and Workshop Items

Attachment 4 – Spent Nuclear Fuel Complex LDR Storage Assessment

Attachment 5 – 2711-E Garage LDR Storage Assessment

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M. S. French	DOE-RL
L. L. Fritz	FH
M. F. Jarvis	DOE-RL
A. G. Miskho	FH
E. J. Murphy-Fitch	FH
R. P. Ollero	BHI
J. E. Rasmussen	DOE-ORP
W. Russell	DOE-ORP
G. L. Sinton	DOE-RL
D. Singleton	Ecology
E. R. Skinnerland	Ecology
H. T. Tilden	PNNL
E. VanMason	Ecology
B. D. Williamson	DOE-RL
R. W. Wilson	Ecology
D. M. Yasek	BHI

ADMINISTRATIVE RECORD: M-026 LDR Report [Care of EDMC, LMSI (H6-08)]

Please send comments on distribution list to Anthony G. Miskho (376-7313).

Attachment 1

**M-026 LDR Report Project Manager Meeting
at
2420 Stevens Center, Conference Room 224
Richland, Washington
Meeting Held July 27, 2005
9:30 am to 11:30 am**

Meeting Agenda

1. Last meeting minutes
2. Hot topics
 - Ecology approval of CY2004 LDR report: Ecology's approval letter is in concurrence
3. Storage Assessments/Data Gap Plans provided to TPA Lead Regulatory Agency Project Managers
 - Spent Nuclear Material Complex (See Attachment 4)
 - 2711-E Garage (See Attachment 5)
 - Focus Area for Assessments: Discussed and closed, See Attachment 3.
4. Action Item Status (See Attachment 3)
5. Workshop items (all items were discussed and remain open. The August meeting will focus on these workshop items)
 - Consolidation of requirements documents and any other new agreements from workshops (From March 14, 2002 Resolution of Dispute)
 - Future LDR Report reporting processes (e.g., frequency, format)
 - Identification of critical LDR report elements
6. Next meeting (date and time): August 24th, 2005, 1:30 – 3:30

Attachment 2

M-026 LDR Report Project Manager Meeting Minutes

at

2420 Stevens Center, Conference Room 224

Richland, Washington

Meeting Held July 27, 2005

9:30 am to 11:30 am

Attendance List

Name

Organization

D. Singleton

Ecology

E. Van Mason

Ecology

A. G. Miskho

FH

D. M. Yasek

BHI

G. L. Sinton

RL

H. T. Tilden

PNNL

J. Doughty

CH2M HILL

W. Russell

ORP

Attachment 3

M-026 LDR Report Project Manager Meeting Minutes
at
2420 Stevens Center, Conference Room 224
Richland, Washington
Meeting Held July 27, 2005
9:30 am to 11:30 am

Actions and Workshop Items

<u>Action #</u>	<u>Responsible Party</u>	<u>Description</u>	<u>Date Closed</u>
02-2003-03	DOE/Ecology	Consolidate the various requirements for the LDR Report for review and comment by Ecology.	
04-2005-01	Ecology	Review the PMM understandings and schedule follow up discussions as necessary	
06-2005-01	DOE	Upon completion of 04-2005-01, DOE will evaluate whether the information in the LDR report used to meet the requirement has changed significantly	

07-2005 Note 1: Regarding storage assessments, DOE will schedule a pre-assessment meeting with Ecology, as necessary to address any upfront issues. Ecology will decide whether or not the meeting is warranted. This note closes the "Focus Area for Assessment."

June 28, 2005

**MANAGEMENT ASSESSMENT:
K BASINS CLOSURE PROJECT (KBCP)
LAND DISPOSAL RESTRICTIONS (LDR) STORAGE ASSESSMENT**

A management assessment of the K Basins Closure Project (KBCP) was initiated in March of 2004 and completed during the 2nd Quarter of CY2005. This report discusses the purpose and results of the assessment.

ASSESSMENT PLAN

- **Purpose and Scope**

Three Land Disposal Restrictions (LDR) Storage Assessments for mixed waste (MW) and potential mixed waste (PMW) are required by Volume 1, Table 3-2 of the *Calendar Year 2003 Hanford Site Mixed Waste Land Disposal Restrictions Report* (DOE/RL-2004-07) (CY2003 LDR Report). In accordance with the U. S. Department of Energy – Richland Operations Office (RL) letter of direction dated June 25, 2002 (02-WMD-013), FH has agreed to perform the LDR Storage assessments described in the LDR report related to FH contract scope as management assessments. The three management assessments applicable to the KBCP include:

- K Basin East
- K Basin West, and
- The Spent Nuclear Facility Complex.

The three LDR Storage Assessments identified in the CY2003 LDR Report were intended to encompass all the activities within the KBCP. The KBCP decided to perform the assessments together, but in a step-wise fashion. This assessment report is the third report in a series of three reports and addressed the activities being performed at the Spent Nuclear Facility Complex. The assessment was conducted by the Environmental Protection staff assigned to the K Basins Closure Project with support from the Central Environmental Protection group. This assessment was to determine the accuracy of the information reported in the annual LDR Report, with the latest report being the CY2003 LDR Report.

The scope of the LDR Storage Assessment is to validate the status of MW and PMW matrices in the Spent Nuclear Facility Complex which consists of the Cold Vacuum Drying (CVD) Facility (142-K), Diesel Generator building (142-KA), 1706-KE Building, and the Canister Storage Building (CSB) (212-H). The outcome of the assessment will identify any MW and PMW material that should be included in the LDR report as no matrices are currently being reported from the Spent Nuclear Facility Complex in the LDR Report.

Once this LDR Storage Assessment is approved, it will be presented at the monthly Land Disposal Restrictions M-026 Project Managers Meeting and entered in the TPA Administrative Record. As agreed to during the March 2002 LDR resolution of dispute, the

June 28, 2005

TPA lead regulatory agency will have the opportunity to evaluate the conclusions drawn in the LDR Storage Assessment.

- **Assessment Personnel**

R. T. Winward, K Basin Closure Project, Environmental Protection
A. G. Miskho, LDR Report Coordinator, Environmental Protection

- **Assessment Schedule**

The LDR Storage Assessment was conducted between March 2004 and June 2005.

- **Performance objectives**

The objective of this LDR Storage Assessment was two-fold:

- Determine if MW or PMW exist at the Spent Nuclear Facility Complex that have not been previously identified in the CY2003 LDR report.

Source Documents:

DOE/RL-2004-07, *Calendar Year 2003 Hanford Mixed Waste Land Disposal Restrictions Report*, U.S. Department of Energy, Richland Operations Office, Richland, Washington

Ecology, EPA, DOE, *Hanford Federal Facility Agreement and Consent Order*, as amended, Washington State Department of Ecology, U.S. Environmental Protection Agency, U.S. Department of Energy

40 CFR 268, *Land Disposal Restrictions*, Subpart E, Prohibition on Storage

WAC 173-303, *Dangerous Waste Regulations*, Section 140, Land Disposal Restrictions

"FH management assessment process requirements"

- **Assessment methodology**

The methods used for this LDR Storage Assessment included a kick off meeting, a pre-walkthrough meeting, waste forecast discussions, interviews, and visual inspection and follow-up inquiries on items in question. The radiological areas within the Spent Nuclear Facility Complex were walked down on March 14, 2005 (basement of 1706-KE) and on June 22, 2005. The areas were inspected visually where possible. No documents were reviewed during the assessment.

June 28, 2005

During the walk through, matrices were evaluated to determine if they were being used, or had a potential use. For matrices not being used, the assessment team escort indicated what knowledge was available on the matrix being questioned. Additional efforts to evaluate available knowledge of the matrices (lead sheets in truck) is viewed as a part of and as a follow up activity to the assessment. Only one item of interest was noted and required follow-up, the delivery truck at the CVD containing lead sheets in the back.

DATA GAP PLAN

An LDR Storage Assessment must include a data gap plan. This section fulfills the requirements of a data gap plan, pursuant to the TPA under Milestone M-26-01¹. According to the LDR resolution of dispute dated March 2002, a data gap plan must contain the following:

- What you know and what you don't know
- What you need to know
- Why the level of unknowns is acceptable or not acceptable from a safety basis for the interim until action is planned or that more information is needed to make this determination.

The above data gap plan elements needed to be addressed for the MW and the PMW matrices identified by the LDR storage assessment². The 105-K West Facility LDR storage assessment identified the following MW and PMW matrices:

Mixed Waste and Potential Mixed Waste Matrices
PMW – Lead in the back of the delivery truck

What you know and what you don't know

The information presented in this section was obtained from the LDR storage assessment walk through. Follow up information supplied after the walk through was used to answer some questions posed below as indicated in the assessment results section.

MW – Lead in the back of the delivery truck: Previous activities have not identified this lead in the mixed waste forecast. A disposition pathway is not finalized although treatment at the Environmental Restoration Disposal Facility would be a likely candidate.

What you need to know

¹ Letter, Alan E. Hopko, RL, to E. K. Thompson, FH, "Contract No. DE-AC06-96RL13200 – Annual Land Disposal Restriction (LDR) Report Requirements and Notification to Conduct Assessments," 02-WMD-213, #0202987, dated June 25, 2002.

² Letter, Sally A. Sieracki, RL, to E. K. Thompson, FH, "Contract No. DE-AC06-96RL13200 – Resource Conservation and Recovery Act (RCRA) Assessment – A&E-SEC-02-009," 02-PMO-0003, #0203878, dated August 19, 2002.

June 28, 2005

MW – Lead contained in the 105-KE Fuel Basins: No additional information is believed to be needed to treat and dispose of the lead within the basins.

Why the level of unknowns is acceptable or not acceptable from a safety basis for the interim until action is planned or that more information is needed to make this determination. (Safety basis is used to denote how the regulators view safe management of MW or PMW. This term does not relate to safety basis documentation issued by the KBC Project and approved by RL.)

The level of unknowns regarding the PMW matrix will not result in any concerns regarding the safe management of the matrix. Sufficient information exists so that there are no likely concerns about ignitable, reactive, or incompatible matrix properties. The project's scheduled activities for closure of the the Spent Nuclear Facility Complex have been discussed with the TPA lead regulatory agency project manager. Additional discussions are expected after the assessment report/data gap plan is entered into the TPA Administrative Record.

ASSESSMENT RESULTS

- **Executive Summary**

Overall, the information known about the MW and PMW matrices do not warrant concerns about the safety of the matrices. No immediate actions are necessary. The lead in the back of the delivery truck needs to be added to the next LDR Report PMW table.

- **Assessment Findings and Observations**

One observation is being reported.

PMW:

- The lead in the back of the delivery truck will require reporting as PMW in the LDR Report if is not removed prior to December 31, 2005. If the lead is removed and dispositioned prior to this date, no reporting is required.

RECOMMENDATIONS -

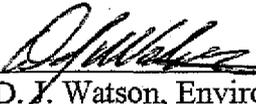
Update the LDR report in the next annual update as follows:

Observation: Create a row or add to an existing row in the PMW table to identify the PMW matrix if the lead is not removed prior to December 31, 2005. See attached issue identification form.

June 28, 2005

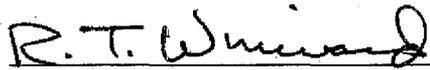
- **Assessment Approval**

Management Assessment Approved by:



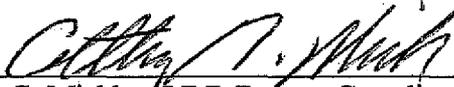
D. J. Watson, Environmental Compliance Officer

6/28/05
Date



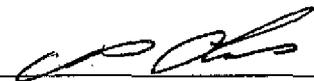
R.T. Winward, Assessment Lead

6/28/05
Date



A. G. Miskho, LDR Report Coordinator

6/28/05
Date



Chris Lucas, 100 K Facility Management

6-28-05
Date

June 28, 2005

Attachment
Issue Identification Form

ISSUE IDENTIFICATION FORM

1. Document Number: SNFP-ENV-04-MA-0101b		2. Corrective Action Record File (CARF) Number: (Assigned by FH CAM)	
3. Initiator Name: R. T. Winward		4. Date Identified: 06/22/2005	
5. Project: KBC		6. Facility: CVD	
7. Issue Number and Title: 001 Potential Mixed Waste reporting			
8. Description of Issue: (Provide a Detailed Description of Issue) Observation: A potential mixed waste matrix was found on the assessment that needs to be reported in the annual LDR Report.			
9. Determine Opportunity for Improvement or Requirement(s) Not Met: <input type="checkbox"/> Opportunity for Improvement <input checked="" type="checkbox"/> Requirement(s) Not Met: (Cite Procedure/Requirements/References) March 2002, Tri-Party Agreement Resolution of Dispute			
10. Initiator Concurrence and Approval from the Responsible Manager Owning Issue:			
RT Winward Initiator Concurrence (Print or type name)		RT Winward Signature	06/28/2005 Date
CD Lucas Manager Approval (Print or type name)		CD Lucas Signature	06/28/2005 Date
NOTE: Initiator concurrence is desirable but not required. If unable to obtain concurrence, enter N/A and proceed with completion of form.			
The Following Section is Completed by the Manager Owning Issue			
11. Describe Why the Issue Occurred: The truck is a legacy item from N Reactor Operations days and contains lead shielding.			
12. Immediate Actions Taken: (List any actions taken in the field. Indicate the date the action was completed, and what was done.) None			
13. Is Further Evaluation of This Issue Recommended? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes, the completion of blocks 14, 15, 16, and 17 may be omitted.			
14. Action: The lead shielding will be removed from the truck for recycle or disposed of as waste if release is not possible.		15. Responsible Manager Owning Action (Optional): CD Lucas	
		16. Actionee (Optional): RA Larson	
		17. Due Date: 12/28/2005	

Submit completed Issue Identification Form via e-mail to the ^Corrective Action Management mailbox, or to the FH CAM Authoritative Source.

Attachment 5

M-026 LDR Report Project Manager Meeting Minutes

at

2420 Stevens Center, Conference Room 224

Richland, Washington

Meeting Held July 27, 2005

9:30 am to 11:30 am

2711-E Garage LDR Storage Assessment

July 12, 2005

**MANAGEMENT ASSESSMENT:
2711-E GARAGE RADIOACTIVE MATERIAL AREA
LAND DISPOSAL RESTRICTIONS (LDR) STORAGE ASSESSMENT**

A management assessment of the 2711-E Garage Radioactive Material Area was initiated in March of 2005 and completed July 2005. This report discusses the purpose and results of the assessment.

ASSESSMENT PLAN

- **Purpose and Scope**

Land Disposal Restrictions (LDR) Storage Assessments for mixed waste (MW) and potential mixed waste (PMW) are required by Volume 1, Table 3-2 of the *Calendar Year 2003 Hanford Site Mixed Waste Land Disposal Restrictions Report* (DOE/RL-2004-07) (CY2003 LDR Report). In accordance with the U. S. Department of Energy – Richland Operations Office (RL) letter of direction dated June 25, 2002 (02-WMD-013), FH has agreed to perform the LDR Storage assessments described in the LDR report related to FH contract scope as management assessments. The 2711-E Garage is identified in the CY2003 LDR Report as an area requiring assessment. The Radioactive Material Area of the 2711-E Garage is the only location at the garage subject to the LDR Storage Assessment requirements.

The assessment was conducted by the Environmental Protection staff assigned to the 2711-E Garage with support from the central Environmental Protection group. This assessment was to determine the accuracy of the information reported in the annual LDR Report, with the latest report being the CY2003 LDR Report. At the time of this assessment, the CY2004 LDR report is going through the Ecology approval process.

The scope of the LDR Storage Assessment is to validate the status of MW and PMW matrices at the 2711-E Garage Radioactive Material Area. The outcome of the assessment will identify any MW and PMW material that should be included in the LDR report. The CY2003 LDR report identified no MW and PWM at the 2711-E Garage. The yet to be approved CY2004 LDR Report identifies a radiator with suspect lead solder at the 2711-E Garage in the PMW table as of December 31, 2004.

Once this LDR Storage Assessment is approved, it will be presented at the monthly Land Disposal Restrictions M-026 Project Managers Meeting and entered in the TPA Administrative Record. As agreed to during the March 2002 LDR resolution of dispute, the TPA lead regulatory agency will have the opportunity to evaluate the conclusions drawn in the LDR Storage Assessment.

- **Assessment Personnel**

E. L. Lamm, Environmental Field Services, Environmental Protection
P. Gonzalez, Environmental Field Services, Environmental Protection
A. G. Miskho, LDR Report Coordinator, Environmental Protection

July 12, 2005

- **Assessment Schedule**

The LDR Storage Assessment was conducted between March 2005 and July 2005.

- **Performance objectives**

The objective of this LDR Storage Assessment was two-fold:

- Determine if MW or PMW exist at the 2711-E Garage Radioactive Material Area that have not been previously identified in the CY2003 LDR report.
- For any MW or PMW found, determine the data gap plan information pertinent to the management of the MW and PMW

Source Documents:

DOE/RL-2004-07, *Calendar Year 2003 Hanford Mixed Waste Land Disposal Restrictions Report*, U.S. Department of Energy, Richland Operations Office, Richland, Washington

Ecology, EPA, DOE, *Hanford Federal Facility Agreement and Consent Order*, as amended, Washington State Department of Ecology, U.S. Environmental Protection Agency, U.S. Department of Energy

40 CFR 268, *Land Disposal Restrictions*, Subpart E, Prohibition on Storage

WAC 173-303, *Dangerous Waste Regulations*, Section 140, Land Disposal Restrictions

"FH management assessment process requirements"

- **Assessment methodology**

The methods used for this LDR Storage Assessment included a kick off meeting and a walk around of the Radioactive Material Area. The walk around occurred on July 6, 2005. All areas were inspected visually. No documents were reviewed during the assessment.

During the walk through, matrices were evaluated to determine if they were being used, or had a potential use. For matrices not being used, the assessment team escort indicated what knowledge was available on the matrix being questioned. No additional efforts were required after the walk around. No MW and PMW were identified and no additional sources of PMW were identified.

DATA GAP PLAN

An LDR Storage Assessment must include a data gap plan. This section fulfills the requirements of a data gap plan, pursuant to the TPA under Milestone M-26-01¹. According

¹ Letter, Alan E. Hopko, RL, to E. K. Thompson, FH, "Contract No. DE-AC06-96RL13200 - Annual Land Disposal Restriction (LDR) Report Requirements and Notification to Conduct Assessments," 02-WMD-213, #0202987, dated June 25, 2002.

July 12, 2005

to the LDR resolution of dispute dated March 2002, a data gap plan must contain the following:

- What you know and what you don't know
- What you need to know
- Why the level of unknowns is acceptable or not acceptable from a safety basis for the interim until action is planned or that more information is needed to make this determination.

The above data gap plan elements needed to be addressed for the MW and the PMW matrices identified by the LDR storage assessment². The 2711-E Garage Radioactive Material Area LDR storage assessment identified the following MW and PMW matrices:

Mixed Waste and Potential Mixed Waste Matrices
None

What you know and what you don't know

Not applicable.

What you need to know

Not applicable.

Why the level of unknowns is acceptable or not acceptable from a safety basis for the interim until action is planned or that more information is needed to make this determination. (Safety basis is used to denote how the regulators view safe management of MW or PMW.)

Not applicable.

² Letter, Sally A. Sieracki, RL, to E. K. Thompson, FH, "Contract No. DE-AC06-96RL13200 – Resource Conservation and Recovery Act (RCRA) Assessment – A&E-SEC-02-009," 02-PMO-0003, #0203878, dated August 19, 2002.

July 12, 2005

ASSESSMENT RESULTS

- **Executive Summary**

There is no current MW or PMW at the 2711-E Garage Radioactive Management Area. There are no concerns identified from this assessment.

The radiator has been moved to the 300 Area but is still on site. The Radioactive Management Area contained two bulldozers, a crane, 2 trucks, a man lift, a fork lift, and a component of the vacuum truck. An empty container was under the vacuum truck component to hold it up. Two low level waste containers held crane cable. Fluids from vehicles are managed as non-radioactive matrices after sampling results show they are non-radioactive.

- **Assessment Findings and Observations**

There are no findings or observations to report.

RECOMMENDATIONS -

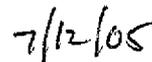
Update the LDR report in the next annual update to either reflect the new location of the radiator in the 300 Area or delete the radiator from the PMW table if it has been sent off-site and recycled before the end of CY2005.

- **Assessment Approval**

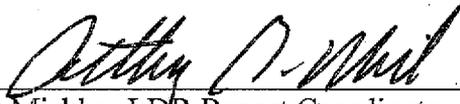
Management Assessment Approved by:



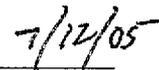
B. J. Dixon, Environmental Compliance Officer



Date



A. G. Miskho, LDR Report Coordinator



Date