

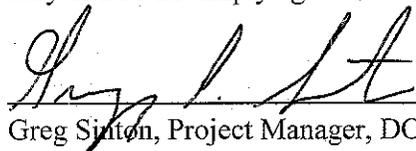
Meeting Minutes – Approval

M-026 LDR Report Project Manager Meeting Minutes
 at
 2420 Stevens Center, Conference Room 126
 Richland, Washington
 Meeting Held April 19, 2005
 9:30 am to 11:30 am

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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.

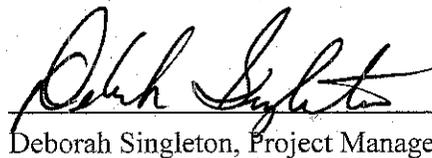

 Greg Sinton, Project Manager, DOE-RL

Date: 5/17/05

Not Present

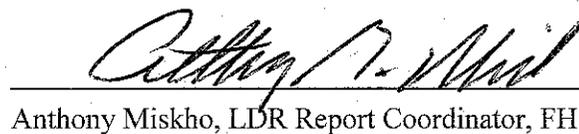
Woody Russell, Project Manager, DOE-ORP

Date: _____


 Deborah Singleton, Project Manager, Washington State Department of Ecology

Date: 5/17/05

Contractor Concurrence


 Anthony Miskho, LDR Report Coordinator, FH

Date: 5/17/05

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 – Management Assessment: 105-K West Facility Land Disposal Restrictions (LDR)
 Storage Assessment

Attachment 5 – LDR Report Requirements and PMM understandings

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| 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 126
Richland, Washington
Meeting Held April 19, 2005
9:30 am to 11:30 am**

Meeting Agenda

1. Last meeting minutes
2. Hot topics
 - Transmittal of CY2004 LDR Report: On schedule
 - LDR Project Manager: Deborah Singleton is the Ecology Project Manager. The signature line for the minutes has been updated.
3. Storage Assessments/Data Gap Plans provided to TPA Lead Regulatory Agency Project Managers
 - 105-K West Facility – Presented here and attached to minutes
4. Action Item Status (See Attachment 3)
5. Workshop items
 - Consolidation of requirements documents and any other new agreements from workshops (From March 14, 2002 Resolution of Dispute). The summary of LDR report requirements and PMM understandings was presented and attached to the minutes. Ecology took an action to review the PMM understandings and schedule follow up discussions as necessary.
 - Future LDR Report reporting processes (e.g., frequency, format) [not discussed]
6. Next meeting (date and time): May 17th, 2005, 9:30 – 11:30

Attachment 2

**M-026 LDR Report Project Manager Meeting Minutes
at
2420 Stevens Center, Conference Room 126
Richland, Washington
Meeting Held April 19, 2005
9:30 am to 11:30 am**

Attendance List

| <u>Name</u> | <u>Organization</u> |
|--------------------|---------------------|
| D. Singleton | Ecology |
| A. G. Miskho | FH |
| D. M. Yasek | BHI |
| G. L. Sinton | RL |
| H. T. Tilden | PNNL |
| E. J. Murphy-Fitch | FH |

Attachment 3

M-026 LDR Report Project Manager Meeting Minutes
at
2420 Stevens Center, Conference Room 126
Richland, Washington
Meeting Held April 19, 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 | Consolidate the various requirements for the LDR Report for review and comment by Ecology. | |
| 02-2005-01 | DOE-RL | Prepare a list of understandings from previous project management meeting minutes | April 19, 2005 |
| 04-2005-01 | Ecology | Review the PMM understandings and schedule follow up discussions as necessary | |

Attachment 4

**M-026 LDR Report Project Manager Meeting
at
2420 Stevens Center, Conference Room 126
Richland, Washington
Meeting Held April 19, 2005
9:30 am to 11:30 am**

105-K West Facility Land Disposal Restrictions (LDR) Storage Assessment

April 1, 2005

**MANAGEMENT ASSESSMENT:
105-K WEST FACILITY
LAND DISPOSAL RESTRICTIONS (LDR) STORAGE ASSESSMENT**

A management assessment of the 105-K West Facility was initiated in March of 2004 and completed during the 1st 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 K Basins Closure Project 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 K Basins Closure Project. The K Basins Closure Project decided to perform the assessments together, but in a step-wise fashion. This assessment report is the second report in a series of three reports and addressed the activities being performed at the 105-K West Facility. The assessment was conducted by the Environmental staff on the K Basins Closure Project with support from the 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 105-K West Facility which consists of the 105-KW Fuel Basin, Transfer Bay, Electrical Equipment Room, Corridor 7, Corridor 10, Chiller Bay, Transfer Corridor, Tool Room, and SWP/Laundry Storage. The outcome of the assessment will identify MW and PMW material that should be included in the LDR report as no matrices are currently being reported from the 105-K West Facility 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

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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
A. G. Miskho, LDR Report Coordinator, Environmental Protection

- **Assessment Schedule**

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

- **Performance objectives**

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

- Determine if MW or PMW exist at the 105-K West Facility 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 areas within 105-K West Facility were walked down on March 10, 2005 and inspected visually where possible.

Documents reviewed during the assessment include:

- Chemical Inventory for the 105-K West Facility

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- FH Contract with RL, Performance Incentive, *SNF Stabilization and Disposition*, RL-012, June 2004.

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 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 older off-set hook located in fuel basin.

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 contained underwater in the 105-KW Fuel Basins (off-set hook) |
|--|

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 contained underwater in the 105-KW Fuel Basins: Previous activities have not identified this lead on the mixed waste forecast. The disposition pathway is not finalized.

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.

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What you need to know

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 105-K West Facility 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 off-set hook lead needs to be added to the next LDR Report PMW table.

- **Assessment Findings and Observations**

One observation is being reported.

PMW:

- The lead underwater in the 105-KW Fuel Basins will require reporting as PMW in the LDR Report.

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. See attached issue identification form.

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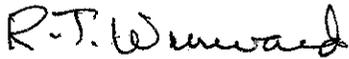
- **Assessment Approval**

Management Assessment Approved by:



D. J. Watson, Environmental Compliance Officer

4/13/05
Date



R.T. Winward, Assessment Lead

4/1/05
Date



A. G. Miskho, LDR Report Coordinator

4/1/05
Date



Chris Lucas, 100 K Facility Management

4-13-05
Date

April 1, 2005

Attachment
Issue Identification Form

ISSUE IDENTIFICATION FORM

| | |
|---|--|
| 1. Document Number: SNFP-ENV-04-MA-0101b | 2. Corrective Action Record File (CARF) Number: <i>(Assigned by FH-CAM)</i> |
| 3. Initiator Name: R. T. Winward | 4. Date Identified: 03/10/2005 |
| 5. Project: KBC | 6. Facility: 105-K West |
| 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:

Opportunity for Improvement

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:

| | | |
|---|-----------------------------|---------|
| Robert Terry Winward | <i>Robert Terry Winward</i> | 4/13/05 |
| Initiator Concurrence <i>(Print or type name)</i> | Signature | Date |
| C.D. Lucas | <i>[Signature]</i> | 4-13-05 |
| Manager Approval <i>(Print or type name)</i> | Signature | 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:

old legacy equipment

12. Immediate Actions Taken: *(List any actions taken in the field. Indicate the date the action was completed, and what was done.)*

Add to O6 LDR list for CY 2005

13. Is Further Evaluation of This Issue Recommended? Yes No

If Yes, the completion of blocks 14, 15, 16, and 17 may be omitted.

| | |
|--------------------|--|
| 14. Action: | 15. Responsible Manager Owning Action (Optional): |
| | 16. Actionee (Optional): |
| | 17. Due Date: |

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
at
2420 Stevens Center, Conference Room 126
Richland, Washington
Meeting Held April 19, 2005
9:30 am to 11:30 am**

**LDR Report Requirements and PMM understandings
Dated April 14, 2005**

April 14, 2005

LDR Report Requirements:

- M-026-01 Milestone description
- 1990 "Requirements for the Hanford LDR Plan" (LDR Requirements Document) signed by EPA and Ecology in 1990.
- Director's Final Determination pursuant to the HFFACO regarding DOE's compliance with LDRs, March 29, 2000.
- LDR Final Determination Errata, March 31, 2000
- January 25, 2000 clarification letter from Ecology delineating the wastes required to be reported.
- Resolution of Dispute dated March 14th, 2002, and
- Various monthly Tri-Party Agreement Project Managers Meeting understandings for the LDR report.

Monthly TPA PMM Understandings:

5-2002: Note 1: Mechanism to transmit documents – The following proposal was developed at the May 29, 2002 meeting and was finalized at the June 18, 2002 meeting: Storage assessments/data gap plans will be provided in the unit-specific project manager meeting and the LDR project manager meeting after they have been completed. The storage assessment/data gap plan will be attached to the meeting minutes. The data gap plan needs to be signed by someone from either DOE or contractor to indicate completeness. The level of signature is at the discretion of the DOE or the contractor.

7-2002 Note 1: Tracking commitments contained in the LDR report: The entire LDR report is considered enforceable as a TPA primary document but only certain commitments from the LDR Report are being identified for purposes of within year tracking and change control.

7-2002 Note 3: The addition or removal of waste streams from the LDR report will be considered a year-to-year change.

9-2002 Note 1: Proposed within year changes to extend or eliminate commitment dates (other than TPA milestones) will be processed using the LDR Report Within Year Change Notice.

10-2002 Note 1: (supplemental text to June 18, 2002 Note 1) Storage assessments/data gap plans will normally be presented at the TPA lead regulatory agency project manager meeting and attached to the minutes. In the absence of minutes, DOE can enter the documents into the administrative record for the TPA lead regulatory agency project manager. The LDR project manager meeting minutes will reference the fact that storage assessments/data gap plans have been presented to the TPA lead regulatory agency project manager.

April 14, 2005

11-2002 Note 1: The ORP procedure, ORP PD 220.1-3 issued 4-18-2002 is acceptable for use. The team lead will use the checklist determine the applicability of individual checklist criteria.

12-2002 Note 1: Milestones cited as commitments for characterization or treatment must be the specific milestone(s) that on completion will satisfy the LDR requirements for characterization or treatment.

02-2003 Note 1: (Hot Topic) Data sheets for the Waste Treatment Plant will begin in the CY2003 Report. For the CY2002 Report, narrative will be added to Volume 1.

02-2003 Note 3: (Workshop item on storage prohibition): The Attachment 4 topic [Should waste that meets LDR or is stored in accordance with the 268.50 storage prohibition be included in the report? (e.g., ERDF Direct Disposal)] is too broad regarding the storage prohibition. It is agreed, however, that mixed waste generated and sent directly to disposal does not need to be reported in the data sheets. If any storage of the mixed waste occurs, the mixed waste must be reported in the data sheets.

02-18-2003 Note 1 (02-2003-01 Action Item): Based on Attachment 5 of the 2/6/03 meeting minutes, the 3711, 309, and 252-U facilities will be removed from the storage assessment schedule because there is no mixed waste or potential mixed waste at the sites. The schedule for the 242-B/BL Storage Assessment will maintain its current assessment schedule in Calendar Year 2007.

02-18-2003 Note 2 (Accomplishing year-to-year changes): Each annual report beginning with the CY2002 report will describe commitment changes proposed in the report. These are the same types of changes that are tracked for within year changes. Ecology's approval of the report with the noted commitment changes will be equivalent to issuance and approval of the change form. Modification of TPA milestones will still be completed pursuant to the TPA process.

03-25-2003 Note 1 (Waste Volume Reporting) DOE will add statement(s) to Volume 1 of the LDR Report to describe waste storage volume reporting practices.

08-19-2003 Note 1: (Consistency/interface between WIDS and the PMWT) During the LDR report kick-off meeting, LDR report data input personnel will be reminded that WIDS data needs to be consulted to determine that MW or PMW is properly considered for inclusion in the LDR Report.

08-19-2003 Note 2: (Comment #2: M-91 Dispute Resolution) DOE will incorporate the results from dispute resolution into the CY2003 LDR Report.

10-21-2003 Note 1: (Attachment 4 Comment #1: ORP LDR Assessments) ORP Assessments identified in the CY2001 LDR Report projected for CY2003 will be completed and documented in a single assessment report.

April 14, 2005

10-21-2003 Note 2: (Attachment 4 Comment #6 T Plant cell 11-L) A meeting was held on October 7, 2003 between the Ecology and RL LDR project managers to discuss Comment #6 in Attachment 4 concerning T Plant Cell 11-L. The meeting discussed the matrices which exist within the T Plant canyon and cells. The meeting concluded with the decision that T Plant Cell 11-L was properly reported in the CY2002 LDR Report (DOE/RL-2003-20). The potential mixed waste table entry for the T Plant canyon will be updated to provide a general statement about the status of the cells as well as identify the cells as containing potential mixed waste in the following three categories: (1) Inaccessible cells, (2) Process cells to be cleaned, and (3) No proposed future uses.

01-20-2004 Note 1: (WTP hot commissioning date extension) Include replacement text in Section 2.1 of Volume 1 to provide current status of hot start up. The description will include related milestones (supersedes 02-2003 note).