



92-CRB-003

Department of Energy

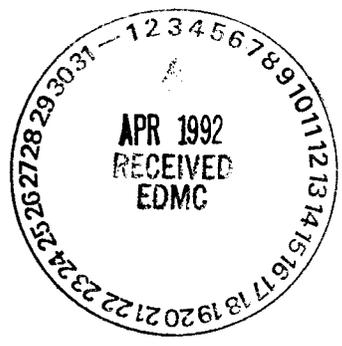
Richland Operations Office
P.O. Box 550
Richland, Washington 99352
MAR 20 1992



9202101

Mr. Paul T. Day
Hanford Project Manager
U.S. Environmental Protection Agency
Region 10
712 Swift Boulevard, Suite 5
Richland, Washington 99352

Mr. David B. Jansen
Hanford Project Manager
State of Washington
Department of Ecology
P.O. Box 47600
Olympia, Washington 98504-7600



Dear Messrs. Day and Jansen:

STATUS OF HANFORD FEDERAL FACILITY AGREEMENT AND CONSENT ORDER MILESTONE M-07-00

At the February 19, 1992, Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) milestone review meeting, U. S. Department of Energy Richland Field Office (RL), informed the U. S. Environmental Protection Agency Region 10 (EPA) and the State of Washington Department of Ecology (Ecology) that preliminary planning at the Hanford Site has indicated that the October 1997, due date for Milestone M-07-00 is in jeopardy. In addition, RL also discussed the need to accelerate interim milestones M-07-01 and M-07-02. Ecology and EPA representatives were informed that a formal change request package is being developed for submittal.

During the February 19, 1992, briefing, EPA requested that RL write a letter summarizing available information on Milestone M-07-00 with regard to the intent, planning, budget projections, and issues. This letter is being transmitted to fulfill that request.

Recent studies performed by Hanford Site technical staff and other national laboratories have shown that commercial or government technology will require additional development work to be suitable for SST waste retrieval. Specific development issues have been documented as a result of identifying waste retrieval technologies as required by milestone M-06-01. Following the scale model testing required by M-06-00 in June of 1994, current best estimates are that it will take five to seven years to complete procurement and testing of a retrieval system to accomplish the actions required under M-07-00.

Additional planning will be performed in Fiscal Year 1992, as part of the TWRS rebaselining. However, the preliminary planning done indicates that even if optimistic assumptions are made on development of the retrieval systems, standard project management, National Environmental Policy Act, and permitting tasks, coupled with the normal capital funding cycles, a full-scale demonstration of waste retrieval technology may miss the October 1997, milestone by several years.

The preliminary planning is based on a conservative assumption that unconfined water sluicing techniques pose an unacceptable environmental risk for SST waste retrieval, and that much more sophisticated techniques will be employed in this action. Additional studies to evaluate this assumption are planned for Fiscal Year 1992, in parallel with work leading to initiation of a retrieval project using long-reach manipulator technology. The results of the studies on retrieval of waste using high water volume sluicing techniques will be reviewed with your staffs when completed. If the analyses show that there is an acceptable risk of proceeding with this technique for some of the SST's, and your staffs concur, it may be possible to meet the October 1997, milestone date demonstrating this technology. It should also be noted that several technologies may be employed in the retrieval of the SST waste, depending upon the waste type and tank integrity. These technologies will be thoroughly evaluated and tested prior to implementation in the radioactive tank environment.

The preliminary M-07-00 planning completed by Westinghouse Hanford Company (WHC) supports a need for acceleration of interim milestones M-07-01 and M-07-02. Milestone M-07-01 requires submittal to Ecology of tank selection criteria, retrieval options and recommended tank selection. Milestone M-07-02 requires Ecology concurrence/non-concurrence with the tank selection criteria, retrieval options, and tank selection. The due dates for these interim milestones are October 1993, and December 1993 respectively. The selection process must move forward to prevent any tank-specific requirements from causing further delays in the schedule. Table 3.1 in the draft Tank Waste Remediation System (TWRS) Decision Plan formally submitted to Ecology on February 14, 1992, includes a proposal to identify the retrieval demonstration tank for M-07-00 by June 30, 1992.

The budget required to continue the planning efforts for M-07-00 and to develop tank selection criteria and retrieval options to accelerate M-07-01 has been allocated as part of the overall TWRS. Final budget levels are being established. It is currently estimated that approximately \$400,000 will be allocated for these tasks.

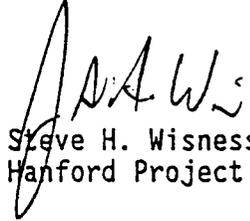
Messers. Day and Jansen
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If you have any questions or would like additional information, please contact
Sandy Trine on (509) 376-6943.

Sincerely,



Steve H. Wisness
Hanford Project Manager

TPD:SLT

cc: .D. J. Newland, WHC
T. B. Veneziano, WHC

CORRESPONDENCE DISTRIBUTION COVERSHEET

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Subject: STATUS OF HANFORD FEDERAL FACILITY AGREEMENT AND CONSENT ORDER
MILESTONE M-07-00

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