

0050471

Meeting Minutes  
Interim Status Dangerous Waste Tank Systems  
Hanford Federal Facility Agreement and Consent Order  
Milestone M-32-00

PROJECT MANAGERS MEETING  
March 10, 1997



The undersigned indicate by their signatures that these meeting minutes reflect the actual occurrences of the above dated Project Managers Meeting (PMM).

W. R. Brown, Representative, Fluor Daniel Hanford, Inc.

Date: 9-4-97

D. E. Jackson, Project Manager, Department of Energy, Richland Operations Office

Date: 9-29-97

J. M. Thurman, Representative, Lockheed Martin Hanford Corporation

Date: 9/4/97

\_\_\_\_\_  
R. W. Wilson, Unit Manager, Washington State Department of Ecology

Date: \_\_\_\_\_

Purpose: Discuss current Double-Shell Tank Farm issues related to Milestone M-32-00.

Meeting minutes are attached. The minutes are comprised of the following:

- Attachment 1 - Summary of Discussion, Agreements and Actions
- Attachment 2 - Attendance List
- Attachment 3 - DRAFT Letter, "Certification Requirements for Integrity Assessments of the Double-Shell Tank System"
- Attachment 4 - WAC 173-303-810(13)(a) Proposed Modifications

**MEMO**

Interim Status Dangerous Waste Tank System  
Hanford Federal Facility Agreement and Consent Order  
Milestone M-32-00 Project Managers Meeting minutes  
March 10, 1997

The following Tri-Party Agreement M-32-00 Project Managers Meeting minutes have not been signed by the Washington State Department of Ecology (Ecology). Ecology disagrees with the wording of a statement made within the minutes; "... (even through the Project will incur additional cost if another IQRPE is selected)." Ecology wished to specify that it was the belief of the U.S. Department of Energy, Richland Operations Office (RL) that there would be additional cost incurred. RL maintains that Ecology did not state their objection during the meeting and therefore, it should not be reflected in the minutes. Therefore, the minutes are issued without Ecology's signature.

This meeting was held on March 10, 1997 to discuss the proposed Double-Shell Tank interim milestone addition to the major M-32-00 milestone.

Attachment(s): None

**MILESTONE M-32-00  
PROJECT MANAGERS MEETING  
March 10, 1997**

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**Summary of Discussion, Agreements and Actions**

This meeting was held to continue discussions on change control form M-32-96-02, which proposes new Hanford Federal Facility Agreement and Consent Order double-shell tank (DST) system integrity assessment interim milestones and target dates. Specifically, the issues of who will function as the independent, qualified, registered professional engineer (IQRPE) and what the IQRPE's certification means were discussed.

Mr. Dale Jackson, of the U.S. Department of Energy, Richland Operations Office (RL) informed Ms. Laura Cusack, of the Washington State Department of Ecology (Ecology) that he would attempt to speak with Dr. Richard Belsey of the Hanford Advisory Board (HAB), Health Safety and Waste Management Subcommittee to determine if the HAB Subcommittee would be interested in providing guidance on the issue of whether or not utilizing Mr. Keith Scott, of the SGN Eurisys Services Corporation, as an IQRPE would give the impression of impropriety, and hence justify selecting another IQRPE (even though the Project will incur additional cost if another IQRPE is selected). Ms. Cusack stated that Ecology had already initiated similar action, and that Mr. Tom Tebb (Ecology) was trying to get on the HAB Subcommittee agenda for Wednesday (March 12, 1997).

Ms. Cusack gave Mr. Jackson a draft copy of the letter (see Attachment 1) Ecology is willing to provide to an IQRPE explicitly stating Ecology's acceptance of assessing all 28 Double-Shell Tanks (DSTs) based on an assessment of data from initial ultrasonic testing of six tanks. Upon a brief review, Mr. Jackson indicated that he had concerns with some of the wording in the letter. Further discussions were differed until a later time.

Ecology's proposed IQRPE certification statement was discussed next (see Attachment 2). Mr. Jackson asked for the meaning of the additions made to the first sentence ("...I have been cognizant of the scope of work performed and major decisions made in the integrity assessments of the tank system described in this report..."). Ms. Cusack explained that this change meant that the IQRPE is cognizant of the assessment approach taken and that the approach is adequate. Mr. Jackson cautioned against using the word "cognizant" as that word is an engineering term of art, and could lead to an interpretation that the IQRPE is specifically responsible for directing and supervising the assessment work performed. Ms. Cusack agreed that this was not Ecology's intent. Mr. Jackson suggested replacing "cognizant" with "aware."

Next the addition of "...and conclusions reached are..." was discussed. Ms. Cusack stated that these words were added so that the IQRPE would certify that the tank system was fit for use. Mr. Jackson expressed his concern that certifying a thought process/conclusion may not be possible. Ecology maintained that the IQRPE is agreeing to conclusions as to the current condition of the tanks.

Mr. Jackson asked if Ecology would agree to using the Washington Administrative Code (WAC) Dangerous Waste Chapter 173-303-810(13) certification statement. Ms. Cusack said that Ecology couldn't disagree but that there would have to be agreement as to what the statement meant. Ecology would still want the certification statement to mean that the IQRPE certified the tank system as fit for use. Mr. Jackson stated that the regulations say that the owner/operator makes the fit for use determination, that the IQRPE's certification is a truthfulness certification, and that Ecology's proposed alternative certification statement goes beyond that required by the WAC. He explained that the integrity assessment report serves as a basis for the owner/operator determination that a tank system is fit for use and that the certification means that the report contains the information (in a true, accurate and complete fashion) needed to make that decision. Ecology did not accept this interpretation.

Mr. Jackson emphasized that RL's concerns with the choice of certification statement language are based in part, on an inability to predict whether or not an IQRPE with appropriate radioactive waste tank experience can be located and retained, and who will certify a tank is "fit for use." It is believed that such a certification creates a very high level of contingent liability for the certifying individual, and will be found unacceptable by virtually all engineers who are both legally and professionally qualified to provide it.

Mr. Jackson also noted that Ecology's required approach is frustrated by the fact that over half of the integrity assessment work that will be certified, has already been performed. He pointed out that the State's professional engineering licensing board has published specific regulations on the use of certification statements and affixing a professional engineer's stamp to documents, that could conflict with the certification language and stamping practices that Ecology proposes in this matter. Mr. Jackson stated that much of the work has already been performed, and consequently, a new engineer will be unable to direct and supervise all work. Consequently, that new engineer may be precluded from affixing his, or her stamp to the certification documentation. Ms. Cusack mentioned that the State licensing board was undecided as to the relationship between its practices and those required of a registered professional engineer by the WAC. It was agreed to shelve the issue until the next Project Managers Meeting so that Ecology could investigate practices throughout the state on this matter.

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**Attendees**

<b>NAME</b>	<b>ORGANIZATION</b>
Russ Brown	Fluor Daniel Hanford - TPA Integration
Laura Cusack	Ecology
Brad Erlandson	Lockheed Martin Hanford Corporation
Dale Jackson	DOE/RL-EAP
Dan Pfluger	Lockheed Martin Hanford Corporation
Keith Scott	SGN Eurisys Services Corporation
Ana Sherwood	Rust Federal Services of Hanford Inc.
Jack Thurman	Lockheed Martin Hanford Corporation
Bob Wilson	Ecology



**Attachment 3**

**MILESTONE M-32-00  
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March 10, 1997**

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DRAFT Letter  
"Certification Requirements for Integrity  
Assessments of the Double-Shell Tank System"

March 10, 1997

Name  
Company  
Street  
City, State, Zip

Dear :

Re: Certification requirements for integrity assessments of the double-shell tank system

The purpose of this letter is to clarify the agreement between the Washington State Department of Ecology (Ecology) and U. S. Department of Energy (USDOE) as to the certification requirements for integrity assessments of the double-shell tank system. WAC 173-303-040 defines a tank system as a tank and its ancillary equipment. In addition, WAC 173-303-640 requires that the integrity of dangerous waste storage tanks be assessed and certified by an independent, qualified, registered professional engineer (IQRPE). Historically this has required testing of every tank individually in addition to visual examinations and design reviews. Typical

USDOE has proposed testing six of the 28 double-shell tanks on Hanford. The six tanks would be representative of those tanks which were subject to the most aggressive corrosive environment. It is USDOE's opinion that this approach is not allowed by the regulations. >

Based on our discussions with the Tank Structural Integrity Panel (TSIP), Ecology has agreed that it could be possible to adequately assess the integrity of all 28 tanks based on a limited scope of testing. The IQRPE, however, will be certifying that all 28 tanks are fit for use. In certifying on this limited scope, therefore, the IQRPE must agree that the parameters used to select the six tanks is appropriate and that the six tanks chosen represent all the worst case conditions. If an IQRPE is willing to make this certification, Ecology will accept it as fulfilling the requirements of WAC 173-303-640.

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**Attachment 4**

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WAC 173-303-810(13)(a) Proposed Modifications

**WAC 173-303-810(13)(a) Modification Proposed by Ecology:**

I certify under penalty of law that I have been cognizant of the scope of work performed and major decisions made in the integrity assessments of the tank system described in this report. I further certify that this document and all attachments were prepared ~~under my direction or supervision~~ in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is and conclusions reached are, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

**WAC 173-303-810(13)(a) Unmodified:**

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

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Administrative Record:

TPA Milestone M-32-00:  
T-2-5, TS-2-1, T-2-7, TS-2-3, S-2-3  
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