



0053837

Department of Energy
Richland Operations Office
P.O. Box 550
Richland, Washington 99352

00-ORL-081

OCT 02 2000

Mr. R. F. Stanley
Policy and Negotiations
Nuclear Waste Program
State of Washington
Department of Ecology
P.O. Box 47600
Olympia, Washington 98504

RECEIVED
OCT 19 2000

EDMC

Dear Mr. Stanley:

MIXED WASTE RECONCILIATION FOR THE INTERIM REPORT ON HANFORD SITE
LAND DISPOSAL RESTRICTIONS (LDR) FOR MIXED WASTE (HANFORD FEDERAL
FACILITY AGREEMENT AND CONSENT ORDER M-26-01J)

This letter serves to inform the State of Washington Department of Ecology of mixed waste volumes in storage at treatment, storage, and/or disposal (TSD) units managed by Fluor Hanford, Inc. (FHI) that were not included in the "Interim Report on Hanford Site Land Disposal Restrictions for Mixed Waste, Volume 3: Hanford Federal Facility Agreement and Consent Order Milestone M-26-01J Deliverable," DOE/RL-2000-39, July 2000 (Interim LDR Report).

53503

As of September 8, 2000, the quantity of mixed waste in storage at FHI-managed TSD units that was omitted from the Interim LDR Report is estimated at 115 cubic meters. Based on reporting methodology in use for the Interim LDR Report, this waste should have been aggregated with various applicable Central Waste Complex waste streams. Please note that the proposed reporting methodology for the next LDR report (the M-26-01K Deliverable), due April 30, 2001, will no longer allow aggregation of waste in this manner, and therefore, this situation should not recur.

A critical aspect of the annual LDR report is to identify the treatment path forward for a mixed waste in order to treat and/or dispose of that mixed waste. To this end, the mixed waste identified in this letter is already managed within existing treatment disposition maps, and therefore, does not affect the existing containerized mixed waste treatment program or current treatment capacity.

A reconciliation of the mixed waste volumes by Interim LDR Report waste streams is identified in the attachment along with a detailed description of the aggregation methodology and discrepancy evaluation. This transmittal also provides copies to all recipients of the Interim LDR Report (M-26-01-J Deliverable) to be kept with their report copies.

OCT 02 2000

Mr. R. F. Stanley
00-ORL-081

-2-

Should you have any questions on this matter, please contact Gregory L. Sinton, Waste Management Division, at (509) 373-7939.

Sincerely,

A handwritten signature in black ink, appearing to read "Clifford E. Clark". The signature is fluid and cursive, with a large initial "C" and "E".

Clifford E. Clark, Acting Program Manager
Office of Regulatory Liaison

ORL:MFJ

Attachment

cc: See page 3

ATTACHMENT

**Reconciliation of Mixed Waste Stored to Mixed Waste Reported
in the Annual Interim LDR Report (M-26-01J Deliverable, issued July 31, 2000)
(Attachment consists of 3 pages, including coversheet)**

**Reconciliation Of Mixed Waste Stored To Mixed Waste Reported
In The Annual Interim LDR Report**

The Interim Report On Hanford Site Land Disposal Restrictions For Mixed Waste Volume 3: Hanford Federal Facility Agreement And Consent Order Milestone M-26-01J Deliverable (Annual Interim LDR Report) contains the following statements in Section 1.1:

"To allow this report to be relatively concise, some LDR mixed waste streams have been combined where treatment and disposal pathways are the same. The Central Waste Complex (CWC) and double-shell tank (DST) waste streams, in particular, include in their respective waste generation projections waste streams generated at other locations, such as the Plutonium Finishing Plant and laboratories. For example, if a generated waste stream routinely is sent to CWC, the waste inventory and future projections will be reported only as future projected receipts (waste generation) for specific CWC waste streams. The specific locations that generate the waste typically will be mentioned in the description of the stream in this report, but a separate generation projection for that location will not be included. However, a stored LDR mixed-waste inventory that routinely is not transferred to CWC, and therefore, is not included in another waste generation projection, is listed as a separate waste stream in this report. ... "

Storage locations within Fluor Hanford (FH) include treatment, storage, and/or disposal (TSD) units and mixed waste at the 324 building. Containerized mixed waste stored within FH is routinely transferred to the CWC except for 324 building mixed waste that has been transferred to the PUREX Storage Tunnels. To determine the scope of the potential discrepancy, all FH managed TSD units with a storage code listed in the Hanford Facility Dangerous Waste Part A Permit Application (DOE/RL-99-21) were evaluated. From this, the following storage locations were identified that contained an inventory of mixed waste:

- 222-S Laboratory Complex
- Waste Encapsulation Storage Facility (WESF)
- 200 Area Effluent Treatment Facility
- T-Plant Complex
- Central Waste Complex
- Waste Receiving and Packaging Facility
- 324 Building

The CWC was removed from further evaluation because all of the waste stored in CWC is reported as existing volume in Table 2-2 of the annual Interim LDR Report. WESF was removed from further evaluation because the entire quantity of mixed waste stored is reported as a separate waste stream from the CWC waste streams in the annual Interim LDR Report. The 324 building was removed from further evaluation because the entire quantity of mixed waste stored was reported as either separate waste streams from the CWC waste streams in the annual Interim LDR Report or was reported within the transuranic waste volume numbers. The remaining storage location waste volumes were determined through review of the Solid Waste

Information Tracking System, interviews with cognizant personnel, and matching the remaining inventory to waste streams contained in the Interim LDR Report. Results are contained in Table 1.

Table 1 - Comparison of Forecasted Volumes Reported vs. Volume of Mixed Waste Stored in Fluor Hanford, Inc. (FHI) managed Treatment, Storage, and Disposal (TSD) units		
Waste Stream from Interim Land Disposal Restrictions (LDR) Report	Forecasted volume reported in Table 2-2 of the Interim LDR Report (cubic meters)	Volume of mixed waste stored in FH managed TSD units not contained in the Interim LDR Report (cubic meters)
MLLW 01A	0	0.9
MLLW-01C	755	1.2
MLLW-02B	51	10.2
MLLW-03B	268	30.3
MLLW-04B	2,384	51.9
MLLW-05B	49	0.6
MLLW-06B	10	0.2
MLLW-07B	836	20.0
Total	4,353	115
Percentage of volume not reported		2.6%

Mr. R. F. Stanley
00-ORL-081

-3-

cc w/attach:

FHI

E.S. Aromi
B. A. Austin
R. B Barmettlor
D. G. Black
L. E. Borneman
D. G. Black
R. C. Bowman
N. C. Boyter
J. E. Bramson
S. B. Cherry
F. M. Coony
C. R. Delannoy
L. P. Diediker
B. J. Dixon
R. H. Engelmann
C.K. Girres
R.H. Gurske
D.J. Hart
J. W. Hales
T. J. Harper
J. S. Hertzfel
B. R. Hill
J. E. Hyatt
D. B. Jensen
O. S. Kramer
G. J. LeBaron
K. M. McDonald
D. E. McKenney
A.G. Miskho
T. L. Moore
R. D. Morrison
E. W. Muhammad
E. J. Murphy-Fitch
D.E. Nester
D. H. Nichols
J. K. Perry
S. M. Price
D. L. Renberger
M. M. Serkowski
F. M. Simmons
J. O. Skolrud
D.K. Smith
W. E. Toebe
J. D. Williams
J. F. Williams
L. F. Willis

BHI

L. M. Dittmer
R. L. Landon
M. C. Hughes
P. J. Mackey
Document and Information Services

PNNL

D. E. Faulk
K. Ikenberry
B. W. Killand,
H. T. Tilden, II
Technical Files

CHG

M. L. Dexter
P. A. Powell

EPA/Ecology

L. Ruud, Ecology
M. A. Wilson, Ecology
D. Bartus, EPA
D. Ingemansen, EPA
D. R. Sherwood, EPA

Indian Tribes

W. Burke, CTUIR
R. Jim, YN
P. Sobotta, NPT

Other

J. E. Shorin, III, WA AGO
M. B. Reeves, HAB
G. P. Chou, HQ
H. L. Belencan, HQ
J. L. Townsend, Bechtel BWXT Idaho, LLC
Ecology Library, Kennewick
EDMC
Central Files
DPC
Hanford Facility Operating Record
M. L. Blazek, Oregon Energy
Administrative Record
Public Reading Room