

START

Change Number M-40-94-05	Federal Facility Agreement and Consent Order Change Control Form <small>Do not use blue ink. Type or print using black ink.</small>	Date Sept. 29, 1994
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Originator D. A. Turner	Phone (509)373-2238
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Class of Change
 I - Signatories II - Project Manager III - Unit Manager

Change Title
 Complete Removal of Floating Organic Layer From Tank 241-C-103

Description/Justification of Change

A modification is requested to Milestone M-40-04, "Complete Removal of Floating Organic Layer From Tank 241-C-103." June 1995

It is proposed that the completion date for Milestone M-40-04 be changed to December 1996. * (See page 2.)

Additional target milestones are proposed as follows:

M-40-04-T01 "Reach Decision to Interim Stabilize Tank 241-C-103 With Floating Organic Layer In Place or Proceed With Removal of Floating Organic Layer." May 15, 1995

M-40-04-T02 "Remove Organic Layer Directly to Double Shell Tank System." July 1996 *(See page 2.)

Removal of the organic layer from Tank 241-C-103 was intended to resolve a combustibility safety issue, as well as a safety issue related to the periodic release of noxious vapors from the tank. Technical studies completed since TPA milestone M-40-04 was established indicate that removal of the floating organic layer from tank C-103 will not resolve the noxious vapor and combustibility safety issues as envisioned.

(continued on Page 2)

Impact of Change

The change could permit a safer approach for handling the floating organic, similar to that used for other wastes in the tank farm. This will reduce personnel radiation exposure and potential exposure to noxious vapors.

Affected Documents

Hanford Federal Facility Agreement and Consent Order - Appendix D, Work Schedule

Approvals

<u>James E. Rasmussen</u> DOE	10/12/94	<input checked="" type="checkbox"/> Approved	<input type="checkbox"/> Disapproved
<u>Kevin Oates</u> EPA	10/12/94	<input checked="" type="checkbox"/> Approved	<input type="checkbox"/> Disapproved
<u>D. Thomas</u> Ecology	10/12/94	<input checked="" type="checkbox"/> Approved	<input type="checkbox"/> Disapproved



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Description/Justification of Change (continued)

It is now considered likely that a significant portion of the noxious vapors emitted from the tank originate in the underlying aqueous or sludge layers. Further, with regard to the combustibility issue, the safety analysis** completed in March 1994 indicates that combustion of the organic can be precluded by imposing minimal operating controls and monitoring requirements.

As an alternative to proceeding directly with removal of the floating organic layer, it is proposed that a study be completed to confirm the technical feasibility of interim stabilizing tank C-103 with the floating organic layer in place. Based on this study, a decision would then be made regarding the path forward, either interim stabilizing tank C-103 with the organic layer in place, or proceeding with organic layer removal. The study will be completed and a decision made by May 1995.

If the decision is made that removal of the floating organic layer is necessary before stabilization can begin, activities will begin immediately and the organic will be removed by December 1996. If the organic is to be pumped directly to the double shell tanks, rather than to an above ground storage tank, this will be completed and the tank will be ready for stabilization by July 1996.

* If the decision is made to proceed to interim stabilization without separate removal of the organic layer, the parties will agree by June 30, 1995 to delete Milestone M-40-04 and Target M-40-04-T02.

** WHC-SD-WM-SARR-001, Revision 0, "Safety Analysis of Exothermic Reaction Hazards Associated with the Organic Liquid Layer in Tank 241-C-103," dated March 1994.

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