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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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May 20, 1993

Mr. James D. Bauer
Department of Energy-Richland Operations
P.O. Box 550
Richland, WA 99352

Mr. R. E. Lerch
Westinghouse Hanford Company
P.O. Box 1970
Richland, WA 99352



Dear Messrs. Bauer and Lerch:

Re: Forty Day Response to Order Number 93NM-201, dated April 21, 1993

This letter acknowledges receipt of forty day response requirements specified in Order Number 93NM-201 as Items 1 through 4. However, the documents provided either do not fully satisfy the intent of the Order or additional information is required. Please provide a written response to the following issues by June 21, 1993.

I am perplexed by the response provided to the items required in the Order. Ecology staff met with DOE and WHC staff on March 15, 1993 and went over item by item in what I believed was a thorough discussion resulting in all parties understanding each requirement. Ecology staff met with DOE and WHC staff in Lacey on May 6, 1993. At this meeting, I was disappointed to learn that DOE and WHC allege that they did not understand the requirements that were covered in the March 15, 1993 meeting.

Item #1: Status - SATISFACTORY RESPONSE TO FORTY DAY REQUIREMENT - Additional information requested

(DOE Enclosure 1) Paragraph 2 of the "Description of Container Status Data" sheet states, "Some discrepancies have been found between the dose rate reported at the time the container was shipped and the dose rate when the container was received at T Plant. In no case was a container accepted that exceeded 2 millirem/hour."



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However, the Unknown Tank Farm Waste Output Summary, dated 4/21/93, reports 17 containers with dose rates greater than 2 millirem/hour.

Issue #1: What happened surrounding the reported change in dose rates between shipment from Tank Farms and receipt at T Plant? How has this discrepancy been explained? Are there drums at T Plant that have dose rates in excess of 2 millirem/hour? Please explain.

On the Solid Waste Information and Tracking System report, the field "TSD Accept Dt" is given.

Issue #2: What does "TSD Accept Dt" define? Is it the date the drum was physically received at the Central Waste Complex, or does it represent another date?

Item #2: Status - UNSATISFACTORY RESPONSE TO FORTY DAY REQUIREMENT - Additional information required

(DOE Enclosure 3) Item #2 in the Order requires a report identifying dangerous waste designation practices currently in place for ongoing waste generation at the 200 Area Tank Farms. Item #2 also requires copies of waste designation procedures governing 200 Area tank farm waste generation. The point of Item #2 is to document that generators know how to properly designate their waste.

The following five documents were provided to satisfy the requirements of Item #2. Concerns with these documents are detailed below.

- o TO-100-052, "Segregate, Package, and Inventory Radioactive Waste," does not address dangerous waste designation. Additionally, Section 5.1, "Determine Waste Type and Quantity," refers to Appendix A for segregation criteria; however, Appendix A does not address contaminated soils.
- o TO-100-045, "In-Process Inspection of Active Waste Containers," does not address dangerous waste designation. Additionally, Appendix A does not address contaminated soils. (Note: Segregation criteria differs between TO-100-052 and TO-100-045.)
- o TO-100-055, "Set-Up/Operate Satellite Accumulation Areas," does not address dangerous waste designation.

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- o WHC-SD-WM-QAPP-016, "Tank Farms Solid LLW and RMW Quality Assurance Program Plan," references WHC-SD-WM-EV-081, "Tank Farms Solid, Low Level and Radioactive Mixed Waste Certification Plan," as well as WHIC-EP-0063, "Hanford Site Solid Waste Acceptance Criteria." WHC-EP-0063 does not cover specific waste designation procedures governing 200 Area tank farm waste generation.
- o WHC-SD-WM-EV-081, Rev 1., "Tank Farms Solid, Low Level and Radioactive Mixed Waste Certification Plan," does address waste generation and characterization procedures governing 200 Area tank farm waste. However, the following additional information is required.

Issue #3: Section 3.1.2.7 CHARACTERIZATION/Sampling states, "Where process knowledge is not valid for characterization, then sampling and testing will be used for characterization. . . . Sampling will be done using approved procedures and sampling plans. . . ." Please provide copies of these "approved procedures and sampling plans."

Issue #4: Section 3.3, Waste Characterized by Process Knowledge, first bullet, states, "Waste tank sludge/core sample and liquid analytical data from the single shell and double shell characterization will be used as documented process knowledge for waste directly attributed to sampling activities, tank maintenance, or other activities where waste is directed associated with tank contents." Please provide a status report identifying which tanks have been characterized based on waste tank sludge/core sampling and liquid analytical data. What chemical analyses have been completed? Are the analyses complete? What analyses results are pending? Has the data been validated?

Issue #5: Section 3.4, Waste Characterized by Sampling and Analysis, states, "This waste stream encompasses waste that cannot be fully characterized by documented process knowledge." It further states, "Chemical properties will be determined by sampling and laboratory analysis when needed." Who determines when and if process knowledge is sufficient? When does this happen in the

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overall waste management process? When the decision is made to sample, what analytical methods are used? Is Appendix J in WHC-EP-0063, Rev. 3. used?

Issue #6: Section 3.1.2.1, Training, references a "training plan specific to radioactive solid waste management." Please provide a copy of this training plan.

Issue #7: Has Tank Farms received approval from Solid Waste Disposal as a low-level waste generator? Or is Tank Farms still in an "Approval Pending" status? Please provide current status of generator approval.

Item #3: Status - **UNSATISFACTORY RESPONSE TO FORTY DAY REQUIREMENT** - Additional information required

Ecology recognizes that there is an interim stay in effect to the extent that Item #3 requires the submission of plans to characterize all 2000+ containers of waste within one year. Nevertheless, the following are deficiencies in the forty day response.

(DOE Enclosure 4) Item #3 in the Order requires a plan for review and approval detailing the established criteria and procedures for waste inspection, segregation, sampling, designation, and repackaging of all containers reported in Item #1. Item #3 also requires the report to include sampling plan criteria for different contaminated media, i.e., soils, compactable waste, high efficiency particular air (HEPA) filters, etc.

SW-PE-WP-042, "Receive, Segregate & Dispose of 'Unknown' Backlog Waste Containers in the 221-T Tunnel," does not provide adequate criteria and procedures for sampling and designation, nor does it provide specific sampling plan criteria for soils or HEPA filters. SW-PE-WP-042 charges the Solid Waste Assessment Team (SWAT) with performing field waste assessments and designation as required on site, and states that SWAT activities will be performed in accordance with the SWAT Desk Instruction for field waste assessment, Attachment E of the procedure (page 1). However, Attachment E was not provided. SW-PE-WP-042 also states that low level waste material will be segregated and inventoried into specific drums as noted in Figure 1 (page 4). However, Figure 1 was not provided.

Issue #8: Please provide SW-PE-WP-042, Attachment E, and Figure 1.

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WHC-IP-0871, Rev. 1, "Receipt and Interim Staging of Backlog Waste," does not provide adequate criteria and procedures for sampling and designation, nor does it provide specific sampling plan criteria for soils or HEPA filters. WHC-IP-0871, Rev. 1, references the most recent version of WHC-EP-0063 (i.e., Rev. 3.). However, WHC-EP-0063 does not provide adequate criteria and procedures for specific sampling and designation projects.

The Order calls for a plan which includes established criteria and procedures for waste sampling and designation, specifically for soils and HEPA filters. These were not provided. Your April 21, 1993 letter, page 2, states, "Plans are underway to characterize and/or repackage backlog waste as necessary before treatment and/or disposal being initiated per the Hanford Solid Waste Acceptance Criteria (EP-0063)."

Issue #9: Please provide sampling plans and procedures that address the deficiencies noted above.

Item #4: Status - UNSATISFACTORY RESPONSE TO FORTY DAY REQUIREMENT - Additional information required

Ecology recognizes that there is an interim stay in effect to the extent that Item #4 requires the submission of plans to characterize all 2000+ containers of waste within one year. Nevertheless, the following are deficiencies in the forty day response.

(DOE Enclosure 4) Item #4 in the Order requires a plan for review and approval documenting the readiness of an appropriate area for waste inspection, segregation, sampling, and repackaging. SW-PE-WP-0042 and WHC-IP-0871 were provided in response to this requirement. Discussions between Ecology and DOE/WHC personnel were based on "unknowns" being processed through T Plant and the remaining backlog containers, already in interim acceptance at the Central Waste Complex (CWC), processed for final acceptance also at CWC. However, your April 21, 1993 letter, page 3, states, "T Plant is also assumed to be the location for additional characterization and repackaging of "Backlog Waste," as part of the second stage of that program."

Issue #10: Where are the 2000+ backlog waste containers from tank farms going to be processed for final acceptance? Is the plan to transport those already in CWC to T Plant? If so, explain why work required under the Order cannot be performed in CWC or some other facility that already has interim status. DOE/WHC's decision to change repackaging facilities from CWC to T Plant, a

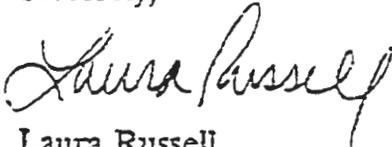
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facility that currently does not have interim status, will not constitute acceptable justification for violating the Order's established timelines for designation if for some unforeseen reason there are delays in T Plant's receipt of interim status. Please discuss.

If I can be of further assistance to you or your staff members in clarifying the intent or expectations of the Order or if you have additional questions or concerns, please contact me at (509) 736-3024.

Sincerely,



Laura Russell
RCRA Compliance Inspector
Nuclear & Mixed Waste Management Program

LR:mf

cc: Cliff Clark, DOE
Gene Senat, DOE
John Wagoner, DOE
Patrick Willison, DOE
Tom Anderson, WHC
Jack Kasper, WHC
Patrick Mackey, WHC
Rick Pierce, WHC

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*Reissue

Author	Addressee	Correspondence No.
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Subject: FORTY DAY RESPONSE TO ORDER NUMBER 93NM-201, DATED APRIL 21, 1993

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*Reissue on 5/25/93 to show MA Payne as the correct Assignee.
(Per request from GH Jackson's office).

Use 9302430B for all responses.

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