



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

1315 W. 4th Avenue • Kennewick, Washington 99336-6018 • (509) 735-7581

December 1, 2000

Mr. Wade W. Ballard  
U.S. Department of Energy  
P.O. Box 550, MSIN: A5-12  
Richland, Washington 99352

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EDMC

Dear Mr. Ballard:

Re: Washington State Department of Ecology's Second Response to the U.S. Department of Energy's Submittal of the Interim Report on Hanford Site Land Disposal Restriction (LDR) for Mixed Waste in Accordance with Milestone M-26-01J

On July 28, 2000, the U.S. Department of Energy (USDOE) submitted the 2000 LDR Report as a primary document in fulfillment of Tri-Party Agreement (TPA) Milestone M-26 and the March 29, 2000, Final Determination. On September 28, 2000, the Washington State Department of Ecology (Ecology) provided comments and required specific actions in response to USDOE's July 28, 2000, submittal. On October 25, 2000, USDOE responded to Ecology by issuing a letter directed to Mr. Michael A. Wilson, Program Manager for Ecology's Nuclear Waste Program. Ecology received this letter on November 1, 2000. 53836 ✓

USDOE's response to Ecology's September 25, 2000, comments and specific actions is inadequate, as detailed below. However, as discussed in recent meetings with USDOE, the unresolved issues are being addressed as part of the larger LDR compliance issues currently before us.

Ecology is disapproving USDOE's 2000 LDR Report. In accordance with the TPA, if USDOE objects to Ecology's disapproval, it shall notify Ecology in writing within seven (7) days of receipt of such notice (TPA, Article VIII, Paragraph 30), at which time efforts are made to resolve the dispute at the project manager level. However, to honor the work being done to resolve the larger LDR issues, Ecology requests that the seven (7) day deadline to notify Ecology of USDOE's objection be postponed until January 18, 2001, (TPA, Article VIII, Paragraph 30(E.)). Concurrence from USDOE regarding this extension is requested by means of signature on the following page (TPA, Article VIII, Paragraph 30(E)).

COMMENTS ON THE 2000 LDR REPORT

Ecology's September 28, 2000, letter required USDOE to take the following actions with regard to the 2000 LDR Report. Specifically:

1. The 2000 LDR Report must be revised to identify and reference (by document number) any assessments completed during the 2000 LDR reporting period (i.e., January-December 1999), and the schedule for performing assessments at all mixed waste locations for the 2001 reporting period (i.e., January-December 2000).
2. Procedures submitted by way of USDOE's sixty (60) day notification must be revised to address the deficiencies noted below:
  - Schedules are needed for conducting performance assessments at each mixed waste storage location.

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December 1, 2000  
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- The "appropriate skills" that are required for personnel conducting the assessments need to be identified.
  - The assessment lead needs to be identified.
  - The criteria for selecting a particular method for conducting assessments needs to be identified.
  - The process for clearly documenting the assessments and taking appropriate corrective action needs to be identified.
3. The 2000 LDR Report must be revised to contain the primary document statement and signature blocks as required by the Final Determination, Section IV.3.B.f.

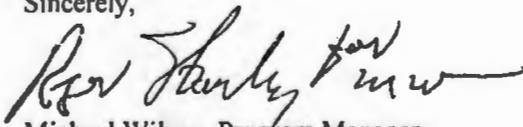
#### USDOE'S RESPONSE TO ECOLOGY'S COMMENTS

USDOE's October 25, 2000, letter did not provide the required information. Specifically:

1. USDOE did not identify and reference (by document number) any assessments completed during the 2000 LDR reporting period. USDOE did provide a schedule for performing assessments for the last half of the 2001 reporting period and the first half of the 2002 reporting period. USDOE did not provide a schedule for performing assessments for the first half of the 2001 reporting period.
2. USDOE did not revise or submit procedures to address the noted deficiencies.
3. USDOE did not revise the 2000 LDR Report to contain the primary document statement and signature blocks as required by the Final Determination, Section IV.3.B.f.

As noted above, Ecology requests that the seven (7) day deadline for USDOE to object to Ecology's disapproval be extended until January 18, 2001. If USDOE concurs with this extension, please sign in the space provided. If you would like to discuss this letter, please feel free to contact me at (509) 736-3090 or Laura Ruud at (509) 736-5715.

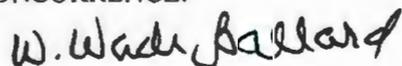
Sincerely,



Michael Wilson, Program Manager  
Nuclear Waste Program

MW:LR:sb

CONCURRENCE:



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USDOE

Date

cc: Dave Bartus, EPA  
Doug Sherwood, EPA  
Cliff Clark, USDOE  
Mary Jarvis, USDOE  
Steve Wisness, USDOE  
Roger Landon, BHI

Pamela Powell, CHG  
Tony Miskho, FH  
James Rasmussen, OIP  
Harold Tilden, PNNL  
Mary Lou Blazek, OCE  
Administrative Record: LDR 2000/M-20-01J

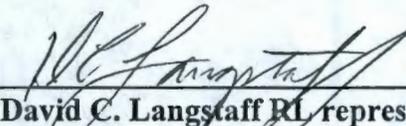
**Meeting Minutes Transmittal**

**300 Area FH Facility Transition General Topics  
Project Managers' Meeting  
Federal Building/Room 554  
Richland, Washington**

**September 14, 2000  
3:00 p.m. to 4:00 p.m.**

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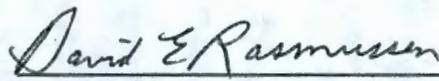
**The undersigned indicate by their signatures that these meetings minutes reflect the actual occurrences of the above dated Unit Managers Meeting.**

  
\_\_\_\_\_  
**David C. Langstaff RI representative**

**Date:** 11/21/00

  
\_\_\_\_\_  
**F. W. Bond Washington State Department of Ecology**

**Date:** 11/29/00

  
\_\_\_\_\_  
**D. E. Rasmussen, Contractor Representative, FH**

**Date:** 11/21/00

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

- Attachment 1 - Agenda**
- Attachment 2 - Summary of Discussion and Commitments/Agreements**
- Attachment 3 - Attendance List**
- Attachment 4 - T-hopper shipping status handouts**
- Attachment 5 - Path Forward 327 Deactivation Project, 9/3/00**
- Attachment 6 - FY 2001 Funding Report for the 303-K Storage Facility**

## Attachment 1

### 300 Area FH Facility Transition General Topics Project Managers' Meeting Federal Building, Room 554 Richland, Washington

September 14, 2000  
3:00 p.m. - 4:00 p.m.

#### AGENDA

1. Introduction
2. Previous meeting minutes
3. 300 Area WATS status
4. Unirradiated uranium disposition -- status/plans/update
5. Silver list issues closeout status, 324/327
  - 11.8 324 Building, Na-contaminated shielded glovebox (SCW)
  - 16.3.8 324 Building, tanks secondary containment and leak detection/RLWS
  - 16.3.11 327 Building, RLWS secondary containment and leak detection
6. Other topics/discussion
  - a. 327 TRU Special Case Waste (SCW) one-gallon containers status
  - b. 327 basement legacy container status/update
  - c. 327 Burst test room heat exchanger pit entry schedule (for planned entry/inspection to be witnessed by Ecology)
  - d. WIDS sites status
    - WIDS sub-sites for 324/327 (RL letter 99-EAP-505)
  - e. 324/327 Quarterly waste tracking update - to be provided to Ecology by second week of October (for quarter ending 9/30/00)
  - f. Other topics
7. Schedule next meeting

## Attachment 2

### 300 Area FH Facility Transition General Topics Project Managers' Meeting Federal Building, Room 554 Richland, Washington

September 14, 2000  
3:00 p.m. - 4:00 p.m.

1. Introduction

Rick Bond was introduced as the new Ecology transition project manager.

2. Previous Meeting Minutes

The July 13, 2000, Project Manager Meeting (PMM) minutes were approved.

3. 300 Area WATS status

The status of the Waste Acid Treatment System (WATS) is unchanged since the July 13, 2000, PMM. The closure plan is being incorporated into Modification E of the Resource Conservation and Recovery Act of 1976 (RCRA) Permit, and Modification E is being delayed due to resolution of issues not related to the 300 Area WATS.

4. Unirradiated uranium disposition -- status/plans/update

A handout was provided by Fluor Hanford (FH) regarding the T-hopper shipping status (Attachment 4). There are 36 T-hoppers remaining to be shipped off-site. FH is continuing to plan for shipment of the billets.

Mr. Stone said that if a change request is going to be submitted, RL should be aware that Ecology is not receptive to any change request justified by budget shortfalls. Mr. Stone said that the Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) only allows for milestone due date changes based on budget shortfalls, if DOE requests funding from Congress and Congress subsequently denies the request.

5. Silver list issues closeout status, 324/327

- 11.8 324 Building; Na-contaminated shielded glovebox (special case waste [SCW])
- 16.3.8 324 Building; tanks secondary containment and leak detection
- 16.3.11 327 Building, Radioactive Liquid Waste System (RLWS) secondary containment and leak detection

These items remain on hold until workshop meeting(s) can be conducted with the Washington State Department of Ecology (Ecology) to resolve these as appropriate.

6. Other topics/discussion

a. 327 transuranic (TRU) SCW one-gallon container status

S. Norton (FH) distributed a handout on the path forward for the 327 deactivation project, 9/03/00 (Attachment 5). D. Rasmussen (FH) and S. Norton provided Ecology with a brief history of the special case waste.

Approximately 40 legacy buckets are expected to remain in the 327 Facility at the end of this fiscal year (FY). S. Norton noted that there was extra funding available during FY 2000 to perform accelerated work on packaging and shipping the buckets, but in FY 2001 the 327 Facility will go back to its normal baseline of minimum safe (min-safe) operations funding. Hence, no legacy waste buckets disposition work is expected in FY 2001.

The 324 Facility expects to have one hot cell cleaned out and another one partially cleaned out this year. Most of the 300 cans in dry storage are expected to be either shipped or in drums ready to ship by the end of this year. Fissile material consolidation will be completed, and packaged and shipping are expected to be complete by the end of this year. All of the pin tubes have been shipped out of the facility to the 200 Area.

b. 327 basement legacy container status/update

D. Rasmussen reported that the status is unchanged since the 5/18/00 PMM (see handout attached to 5/18/00 meeting minutes). This item refers to some containers that FH is tracking as a result of an Ecology inspection. The high priority containers have been shipped. Mr. Stone reported that Bob Wilson, lead the inspector for the 1/99 327 Facility inspection, was okay with this, since the high priority waste was dispositioned.

- c. 327 burst test room heat exchanger pit entry schedule (for planned entry/inspection to be witnessed by Ecology)

D. Rasmussen stated that this topic is also related to the Ecology inspection referred to in 6(b). Per the 327 Facility inspection report issued by Ecology, dated 5/28/99, RL is hereby notifying Ecology that entry into the pit will not occur in FY 2000. The burst test room has a pit under the floor with a concrete cover block. The past Ecology inspection indicated there was no information available on the heat exchanger pit, such as documentation indicating that the pit is empty. Based on the priority for waste packaging and shipping activities, FH has concluded that entry into the pit will not be able to be performed during FY 2000. S. Norton reported that the equipment has been procured and a job package has been developed for entry into the pit. A new completion date March 31, 2000, was given for the planned entry, and Ecology will be notified in advance to allow Ecology to witness the work. Ecology indicated that they consider the new completion date to be a commitment.

- d. WIDS sites status

- WIDS sub-sites for 324/327 (RL letter 99-EAP-505)

A. Stone stated that this topic could be removed from the agenda, and that he would discuss it with R. Bond.

- e. 324/327 Quarterly waste tracking update - to be provided to Ecology by second week of October (for quarter ending 9/30/00)

D. Rasmussen confirmed that the waste tracking update will be provided to Ecology as stated.

- f. Other topics

A. Stone stated that Ecology received the contractor's accelerated closure proposal from the U.S. Department of Energy, Richland Operations Office (RL) at the end of July 2000. D. Singleton (Ecology) noted that Ecology has some concerns with the proposal, but has not made any decisions on how to respond. Mr. Stone said Ecology has not been told if RL will pursue the initiative. A brief discussion ensued regarding whether to keep this topic as an agenda item. RL, FH, and Ecology agreed to wait until a decision has been made regarding this possible approach for accelerated cleanup, and then the subject would be addressed.

D. Templeton (RL) stated that he provided D. Singleton with a status of the special case waste project management plan. D. Singleton indicated that she reviewed the plan and will be sending comments tomorrow (9/15/00).

M. Barnett (FH) provided the FY 2001 303-K funding report to Ecology (Attachment 6). There had been previous communication with Ecology to provide a copy to R. Bond at this PMM, to be then passed to F. Jamison (Ecology).

J. Perry (FH) noted that he had a previous action to contact J. Wallace (Ecology) to determine whether the 300 Area WATS and/or 303-K should be included in the Waste Management PMMs. Mr. Perry sent an e-mail message to J. Wallace, but no reply was received. Mr. Stone asked Mr. Perry to send a similar e-mail message to F. Jamison.

7. Schedule next meeting

The next meeting was scheduled for 3:00 p.m. on November 12, 2000, at the Federal Building in Richland, WA.

**Attachment 3**

**300 Area FH Facility Transition General Topics  
Project Managers' Meeting  
Federal Building/Room 554  
Richland, Washington**

**September 14, 2000  
3:00 p.m. – 4:00 p.m.**

**Attendance List**

**Meeting Title:** 300 Area FH Facility Transition General Topics Project  
Managers Meeting (PMM)

**Date:** September 14, 2000

*Original included in hard copy.*

<b>Name</b>	<b>Company</b>	<b>Phone Number</b>
Jon Perry	FH-RCP	376-4791
Steve Norton	FH-RCP (327)	376-9717
Kimberly L. Williams	DOE-RL (327)	373-1646
Rick Bond	Ecology	736-3007
Darrell Riffe	FH-RCP	376-0149
David Langstaff	DOE-RL	376-5580
Tina Masterson-Heggen	Ecology	736-5701
Deborah Singleton	Ecology	736-5722
Alex Stone	Ecology	736-3018
David W. Templeton	DOE-RL	373-2966
Jeff Ayres	Ecology	736-5717
David E. Rasmussen	FH-RCP (324/327)	376-3288
J. Matthew Barnett	FH-RCP (300 Area ADP-Env.)	373-2928
R. L. Guillen	DOE-RL (FSS)	376-0254

Attachment 4

T-Hopper Shipping Status  
 Ecology Project Manager's Meeting – General Topics  
 14 September, 2000

Date	No. T-Hoppers Shipped Total	Cumulative # Shipped	MTU Shipped	Cumulative MTU Shipped	Activity Shipped (Ci)	Cumulative Activity (Ci)
7/23	4	4	13.70	13.70	13.12	13.12
8/03	8	12	26.82	40.52	25.41	38.53
8/08	8	20	27.55	68.07	26.40	64.93
8/11	8	28	27.48	95.55	25.79	90.72
8/15	12	40	41.49	137.04	39.77	130.49
8/17	12	52	41.29	178.33	39.55	170.04
8/22	12	64	41.40	219.73	38.50	208.54
8/24	12	76	38.45	258.18	35.64	244.18
8/29	12	88	41.32	299.50	37.88	282.06
8/31	12	100	41.25	340.75	35.53	317.59
9/06	12	112	41.45	382.20	37.40	354.98
9/07	12	124	41.41	423.61	39.10	394.08

As of 9/14, 148 T-hoppers have been shipped. Work continues on track to finish by end of FY2000.

**PATHFORWARD  
327 DEACTIVATION PROJECT**

**Week Ending 09/03/00**

**Waste Buckets**

- 30 legacy buckets shipped since 7/10/00 status sheet
- 2 hot cell cleanout buckets shipped since 7/10/00 status sheet
- 12 buckets from dry storage items packaging shipped since 7/10/00 status sheet
- 11 buckets from fissile items packaging shipped since 7/10/00 status sheet
- 6 buckets from pin tube resizing packaging shipped since 7/10/00 status sheet

Buckets in Hot Cells	Buckets in Drums	Buckets Shipped
Initial legacy 70	31*	42 (was 12 on 7/10/00)
HC cleanout 6	1	9 (was 7 on 7/10/00)
Dry Storage 1	2	12 (was 0 on 7/10/00)
Fissile consolidation 1	0	11 (was 0 on 7/10/00)
Pin Tube resizing - all in drums	0	6 (was 0 on 7/10/00)

\* 2-Loaded in FY99

**Dry Storage Items**

**Fissile**

Table	Available	Removed	Percent	gm	Removed	Percent
1	15	2	13.3	47.5	5.2	10.9
2	35	1	2.9	204.4	6.0	2.9
3	26	24	92.3	168	154.3	91.8
4	2	2	100.0	12.6	12.6	100.0
5	1	1	100.0	0.3	0.3	100.0
<b>Total</b>	<b>79</b>	<b>30</b>	<b>38.0</b>	<b>432.8</b>	<b>178.4</b>	<b>41.2</b>

**Non Fissile**

Table	Available	Removed	Percent	Stuck	Empty
<b>Total</b>	<b>218</b>	<b>209</b>	<b>96</b>	<b>5</b>	<b>4</b>
<b>G Total</b>	<b>297</b>	<b>239</b>	<b>80</b>		

## **ATTACHMENT 6 (page 1 of 2)**

### **Fiscal Year 2001 303-K Funding Report**

Hanford Site Part B Permit Condition V.14.B.f, associated with the 303-K Storage Facility Closure, requests an annual report related to the funding and planning to complete the closure activities of this TSD.

The FH Fiscal Year 2001 Multi-year Work Plan requests funding from DOE to complete the 303-K Facility closure activities. The estimated closure cost is \$315000. This request is funded at this time per the current Priority Planning List.

An Engineering Evaluation/Cost Analysis (EC/CA) will be prepared and submitted for approval. The two uranium hotspots in the soil will be removed and removal areas sampled. The 303-K building will be demolished and the debris is planned to be disposed at ERDF. The schedule for these activities is attached.

ID	Icon	Task Name	Start	Finish	2001											
					Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug
1		Soil Removal	10/2/00	4/25/01												
2	☐	Plan Soil Hot Spot Remediation	10/2/00	10/31/00												
3		Remove Soil Hotspot and Sample	11/1/00	11/20/00												
4	☐	Analyze Samples	11/21/00	2/28/01												
5	☐	Resolve Sample Analysis	3/1/01	4/25/01												
6		303-K Demolition	10/2/00	9/5/01												
7	☐	Prepare EC/CA	10/2/00	11/30/00												
8		EC/CA Approval	11/30/00	4/5/01												
9	☐	Plan 303-K Demolition	3/1/01	5/2/01												
10		303-K Demolition	5/3/01	7/25/01												
11		Submit Closure Summary	7/26/01	9/5/01												

Project: 303-K Demolition Date: 9/6/00	Task		Rolled Up Task		Project Summary	
	Split		Rolled Up Split		External Milestone	
	Progress		Rolled Up Milestone		Deadline	
	Milestone		Rolled Up Progress			
	Summary		External Tasks			

R. T. Stordeur	FH	L6-04
C. P. Strand	FH	A3-02
A. E. Teimouri	RL	A2-15
D. W. Templeton	RL	L1-08
G. A. Williams	RL	A5-15
K. L. Williams	RL	A6-38
M. S. Wright	FH	L1-08
Y. K. Yerxa	DOE	A5-15

Environmental Portal

**ADMINISTRATIVE RECORD (two copies): 300 Area FH General Topics Project Managers' Meeting, (S-3-4); 303-K (S-3-1) [Care of EDMC (H6-08)]**

**Washington State Department of Ecology Nuclear and Mixed Waste Hanford Files,  
PO Box 47600, Olympia, Washington 98504-7600**

**Please send comments on distribution list to D. L. Coleman (L1-06), (509) 376-9170.**

**Distribution:**

R. W. Bailey	FH	S4-49
J. M. Barnett	FH	L1-05
M. W. Benecke	FH	L6-26
J. M. Bishop	FH	L6-26
F. W. Bond	Ecology	B5-18
F. J. Carvo	FH	L1-03
G. B. Chronister	FH	S4-49
C. E. Clark	RL	A5-15
B. L. Curn	FH	G1-29
E. B. Dagan	DOE	A5-15
G. P. Davis	Ecology	B5-18
L. A. Dietz	BHI	H0-20
R. H. Engelmann	WMH	G1-30
T. L. Erickson	FH	L1-02
D. T. Evans	RL	A6-38
R. L. Guillen	RL	L1-03
J. W. Hales	FH	A3-02
R. G. Hastings	DOE	N2-36
D. F. Iwatate	FH	A1-14
R. E. Johnson	FH	G1-29
J. M. Kisielnicki	FH	L1-04
D. C. Langstaff	RL	L1-08
G. J. LeBaron	FH	S4-49
S. N. Luke	FH	G1-30
T. K. Masterson-Heggen	Ecology	B5-18
E. M. Mattlin	RL	A5-15
D. J. McBride	FH	L6-04
A. Montelongo	FH	L1-04
S. H. Norton	FH	L1-03
J. K. Perry	FH	L1-04
R. E. Piippo	FH	A5-15
S. M. Price	FH	A0-22
A. L. Prignano	FH	G1-30
D. E. Rasmussen	FH	L1-04
J. A. Remaize	FH	L6-26
J. G. Riddelle	FH	L1-02
D. J. Riffe	FH	L5-66
J. R. Robertson	FH	L1-04
M. M. Serkowski	FH	L1-05
G. L. Sinton	RL	H0-12
S. J. Skurla	Ecology	B5-18
J. M. Steffen	FH	L5-66
R. W. Stevens	FH	L1-03