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Department of Energy

Richland Field Office
P.O. Box 550
Richland, Washington 99352



93-RPS-160

APR 27 1993

Mr. George C. Hofer
Hanford Project Manager
U.S. Environmental Protection Agency
Region 10
1200 Sixth Avenue
Seattle, Washington 98101

Mr. Roger F. Stanley, Director
Tri-Party Agreement Implementation
State of Washington
Department of Ecology
P.O. Box 47600
Olympia, Washington 98504-7600

Dear Messrs. Hofer and Stanley:

ESTABLISH NEW INTERIM HANFORD FEDERAL FACILITY AGREEMENT AND CONSENT ORDER
MILESTONE M-20-48

The 241-Z Treatment and Storage Tanks are currently being operated as a regulated waste treatment and storage unit under interim status. The U.S. Department of Energy, Richland Field Office is requesting the establishment of a new interim Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) Milestone, M-20-48, for the submittal of the 241-Z Treatment and Storage Tanks Dangerous Waste Permit Application (Part B). A draft Tri-Party Agreement Change Control Form reflecting this change is enclosed. Approval of this requested change will establish a date of May 31, 1996, for the submission of the Part B to the State of Washington Department of Ecology and the U.S. Environmental Protection Agency. It is suggested that disposition of this change request occur in the May 1993 project manager's meeting minutes.

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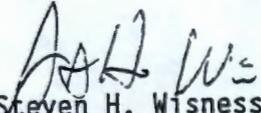
Messrs. Hofer and Stanley
93-RPS-160

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APR 27 1993

Should you have any questions regarding this request, please contact
Mr. C. E. Clark on (509) 376-6798.

Sincerely,


Steven H. Wisness
Hanford Project Manager

Enclosure:
Draft Tri-Party Agreement Change
Control Form

- cc: Administrative Records, w/encl.
B. A. Austin, WHC, w/encl.
R. C. Bowman, WHC, w/encl.
G. W. Jackson, WHC, w/encl.
H. E. McGuire, WHC, w/o encl.
R. D. Redekopp, WHC, w/encl.
E. D. Vogt, WHC, w/encl.

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|-----------------------------|--|------|
| Change Number M-20-93-01 | Federal Facility Agreement and Consent Order Draft Change Control Form Do not use blue ink. Type or print using black ink. | Date |
|-----------------------------|--|------|

| | |
|------------------------------|-----------------------|
| Originator John M. Kovacs | Phone 509-376-1291 |
|------------------------------|-----------------------|

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| Class of Change <input type="checkbox"/> I - Signatories <input checked="" type="checkbox"/> II - Project Manager <input type="checkbox"/> III - Unit Manager |
|--|

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| Change Title Establish New TPA Milestone "Submit the 241-Z Treatment and Storage Tanks Part B Permit Application to Ecology and the EPA (M-20-48)" |
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| Description/Justification of Change Establish a Tri-Party Agreement Milestone M-20-48 to read "Submit the 241-Z Treatment and Storage Tanks Part B Permit Application to Ecology and the EPA," May 31, 1996. JUSTIFICATION: Page 2 <div style="text-align: right; font-size: 2em; font-weight: bold; opacity: 0.5;">DRAFT</div> |
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| Impact of Change This change reflects the commitment to obtain a Part B permit application for the 241-Z Treatment and Storage Tanks. |
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| Affected Documents Hanford Federal Facility Agreement and Consent Order Action Plan-Appendix D, Table D-3 and Figure D-1. |
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|--|--|
| Approvals <input type="checkbox"/> Approved <input type="checkbox"/> Disapproved | |
| DOE _____ Date _____ | |
| EPA _____ Date _____ | |
| Ecology _____ Date _____ | |

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JUSTIFICATION FOR MAY 1996 SUBMITTAL
OF THE
241-Z TREATMENT AND STORAGE TANKS
PART B PERMIT APPLICATION

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The Plutonium Finishing Plant (PFP) is currently undergoing an integrity assessment of its dangerous waste tank system as required by WAC 173-303. The scope of the integrity assessment includes the 241-Z Treatment and Storage Tanks (241-Z), waste tanks, containment vaults, and associated waste transfer piping. The waste transfer piping is within the structure and interconnecting waste transfer lines between the 236-Z, 234-5Z and 241-Z buildings which support the PFP mission. The mission of the PFP requires that the 241-Z remain in operation to receive waste generated during the stabilization campaign. The results of the waste tank system integrity assessment will establish the basis for identifying and scheduling corrective actions necessary for the continued operation of the 241-Z.

The 241-Z has been in service for approximately 40 years and is approaching the end of its expected operational life span. In light of this fact, Project C-031H, "Plutonium Finishing Plant Liquid Effluent Treatment Facility," was initiated to upgrade the 241-Z and its operation by replacing the existing tanks, piping, and operating control systems; replacing the existing interconnecting waste transfer lines between the 236-Z, 234-5Z, and 241-Z Buildings with direct buried double containment piping; and upgrading each tank's vault, structural integrity, and secondary containment capabilities. The DOE-RL Project Management Division issued a stop work on the construction and design of Project C-031H on October 23, 1992. RL requested Westinghouse Hanford Company to evaluate Project C-031H to determine the best options to redefine the scope to meet current mission needs for the PFP.

The current strategy is to operate the PFP in order to stabilize plutonium bearing solutions and chemically active solids to allow the PFP to be placed in a safe standby posture. This strategy requires that the Plutonium Reclamation Facility (PRF) to operate for 40 weeks beginning June 1993. Six months after the PRF ceases operations, the Remote Mechanical C (RMC) Line (located in the 234-5Z Building) will begin operations. The RMC Line is scheduled to operate for approximately 35 weeks. Characterization of the liquid waste generated by the PRF and the RMC Line will be conducted during these time frames.

Submittal of the 241-Z Treatment and Storage Tanks Part B Permit Application in May 1996 will allow time to develop complete and technically correct design and operating data that is fully consistent with the future of the PFP complex.

CORRESPONDENCE DISTRIBUTION COVERSHEET

| | | |
|---|---|--------------------|
| Author | Addressee | Correspondence No. |
| S. H. Wisness, RL | G. C. Hoefer, EPA R. F. Stanley, Ecology | Incoming: 9303442 |
| Subject: ESTABLISH NEW INTERIM HANFORD FEDERAL FACILITY AGREEMENT AND CONSENT ORDER MILESTONE M-20-48 | | |

INTERNAL DISTRIBUTION

| Approval | Date | Name | Location | w/att |
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| | | Correspondence Control | A3-01 | X |
| | | President's Office | | X |
| | | B. A. Austin | B2-35 | X |
| | | B. M. Barnes | H6-24 | X |
| | | R. C. Bowman | H6-24 | X |
| | | S. L. Bradley | B3-06 | |
| | | R. C. Brunke | H6-23 | X |
| | | C. J. Geier | H6-21 | X |
| | | G. W. Jackson, Assignee | H6-20 | X |
| | | P. J. Mackey | B3-15 | X |
| | | D. J. McBride | T5-54 | X |
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| | | D. A. Moore | H6-21 | X |
| | | R. D. Morrison | B2-35 | X |
| | | S. M. Price | H6-23 | X |
| | | F. A. Ruck III | H6-23 | X |
| | | E. C. Vogt | T5-50 | X |
| | | J. L. Waite | B2-35 | X |
| | | TPA File (M-20) | B2-35 | X |
| | | EDMC | H6-08 | X |
| | | R.D. Redekopp | T5-50 | X |



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