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Tri-Party Agreement

Mr. Dan Silver, Assistant Director  
Waste Management  
State of Washington  
Department of Ecology  
P.O. Box 47600  
Olympia, Washington 98504-7600

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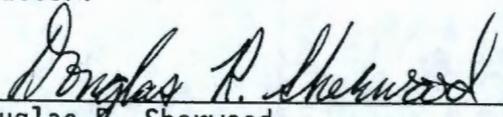
Mr. Randy Smith, Director  
Hazardous Waste Division  
1200 Sixth Avenue  
Mail Stop HW-111  
Seattle, Washington 98101

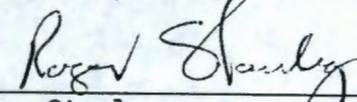
Mr. James E. Rasmussen, Acting Director  
Environmental Assurance, Permits,  
and Policy Division  
U.S. Department of Energy  
Richland Operations Office  
P.O. Box 550  
Richland, Washington 99352

Dear Messrs. Silver, Smith and Rasmussen:

Please note that, pursuant to our Dispute Resolution Committee Agreement of February 7, 1995, agency representatives have tentatively agreed to a new Tri-Party Agreement milestone concerning 324 Unit Closures (see attached Change Request M-89-94-01). We will now be moving to public comment prior to final approval. Thank you for your help in this matter.

 3/20/95  
Steven H. Wisness,  
Hanford Project Manager  
U.S. Department of Energy  
Richland Operations Office

  
Douglas R. Sherwood  
Hanford Project Manager  
U.S. Environmental Protection  
Agency

 3/20/95  
Roger Stanley  
Hanford Project Manager  
Department of Ecology  
State of Washington

cc: Administrative Record  
W. J. Madia, PNL  
M. H. Schlender, PNL



Description/Justification of Change (Continued)

The REC complex of the 324 Building is designed to handle high activity radioactive wastes and materials in a research setting, with remote handling capabilities, and with appropriate shielding and unique space considerations.

A 324 hot cell restoration project (the B-Cell Cleanout Project (BCCP)) has been initiated in an effort to clean out and stabilize high activity, dispersible MW that have accumulated in the REC B-cell. Work under The BCCP will also result in the removal of MW, inactive research equipment, and other materials housed in the B-cell. Containerized MW are currently being stored in the REC (primarily in B-cell). One container of oil and absorbent from a 1994 B-cell shielded viewing window leak is stored in the D-cell. Containerized storage of high activity MW in the B-cell will continue until a technically sound pathway for storage elsewhere, and/or treatment and disposal is developed. Containerized MW storage in the REC may include waste transferred from the HLV tanks as a result of implementation of the preferred option identified via milestone M-89-01A. The (M-89-01A) report will identify the preferred option, provide planning/execution details and allow implementation of actions necessary to ensure safe handling and removal of liquid MW in the HLV tanks. Treatment and storage of HLV tank wastes in the REC will require development of an acceptable technical process and compliance with regulatory requirements.

High activity liquid MW is being stored in the 324 Building HLV tanks (e.g., TK-104, -105, -107). These wastes were originally utilized as radioactive feed materials for research and development projects conducted in the REC.

Initial assessment by USDOE of the waste management options for these materials has determined that they present difficult management challenges in that (at present) no definitive workplan for transportation, treatment and disposal, and/or long term permitted storage exists. Because of the location of the 324 building with respect to the Columbia River and the Tri-cities, the high activity of the wastes, and the dispersibility of the waste in the B-cell, these wastes pose a significant environmental, worker safety, and public health risk. These milestones have been proposed to minimize these risks in the near term, to achieve compliant management of the wastes, and to ensure long term protection of human health and the environment.

The following Milestones set the Schedule for key actions necessary to achieve compliance and complete closure of non-permitted mixed waste units in the 324 Building Radiochemical Engineering Cell (B-cell and D-cell), and High Level Vault:

M-89-00	Complete Closure of Non-Permitted Mixed Waste Units in the 324 Building REC B-cell, REC D-cell, and High Level Vault.	TBE*
	*A date will be established for this Major Milestone immediately following Ecology approval of the REC/HLV closure plan (see M-20-55).	
M-89-01	Complete removal of 324 Building HLV tank MW (e.g., TK-104, TK-105, TK-107) with the exception of residues which may remain following flushing and draining to the extent possible.	10/31/96
M-89-01A	USDOE will submit to Ecology a report identifying the preferred option for management of liquid MW in the HLV tanks.	3/31/95

Description/Justification of Change (Continued)

- M-89-02** Complete removal of 324 Building REC B-cell MW and equipment. 5/31/99
- Actions under this milestone include containment and removal of all B cell dispersible materials, excess equipment and debris. Containerized MW will be managed in compliance with chapter 173.303 WAC, thereby reducing risks to human health and the environment. Any remaining residues following removal actions will be managed through the final closure process. USD0Es' 324 building REC B cell clean-out project (BCCP) will be used as a guide for containerizing dispersible MW and removing unnecessary equipment and materials from B-cell.
- M-89-03** Achieve compliance with interim status facility standards at non-permitted 324 building MW units. 3/31/95
- Because of high radiation fields associated with MW stored in the REC and HLV tanks, alternative compliance measures for some interim status requirements are expected. In these instances USD0E will propose alternative measures for Ecology approval no later than March 31, 1995.
- M-89-04** Submit to Ecology a report identifying MW management alternatives and USD0E's proposal for achieving clean closure of the 324 Building REC B-cell, D-cell and HLV. This report will aid development of the 324 Closure Plan required by milestone M-20-55. 6/30/95
- The proposal will outline a feasible and cost effective program to achieve clean closure of the non-permitted storage units and compliant management of the MW currently stored in them.
- M-20-55** Submit closure plan for Non-Permitted Mixed Waste Units located in the 324 Building REC B-cell, REC D-cell and HLV. 12/31/95