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Meeting Minutes – Approval

M-026 LDR Report Project Manager Meeting Minutes
at
2420 Stevens Center, Conference Room 126
Richland, Washington
Meeting Held February 15, 2005
9:30 am to 11:30 am

The undersigned indicate by their signatures that these meeting minutes reflect the actual occurrences of the above dated meeting. Signatures denote concurrence with content only and do not imply agreement or commitments.

Greg J. Sinton Date: 4/19/05
Greg Sinton, Project Manager, DOE-RL

Woody Russell Date: 4/19/05
Woody Russell, Project Manager, DOE-ORP

for Eric Van Mason Date: 4/19/05
Eric Van Mason, Project Manager, Washington State Department of Ecology

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Contractor Concurrence

Anthony J. Miskho Date: 4/19/05
Anthony Miskho, LDR Report Coordinator, FH

Purpose: Discuss LDR Report related topics
The attached minutes are comprised of the following:
Attachment 1 - Meeting Agenda
Attachment 2 - Attendance List
Attachment 3 - Actions and Workshop Items
Attachment 4 – Management Assessment: 105-K East Facility Land Disposal Restrictions (LDR) Storage Assessment

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B. D. Williamson	DOE-RL
R. W. Wilson	Ecology
D. M. Yasek	BHI

ADMINISTRATIVE RECORD: M-026 LDR Report [Care of EDMC, LMSI (H6-08)]

Please send comments on distribution list to Anthony G. Miskho (376-7313).

Attachment 1

M-026 LDR Report Project Manager Meeting
at
2420 Stevens Center, Conference Room 126
Richland, Washington
Meeting Held February 15, 2005
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Meeting Agenda

1. Last meeting minutes

2. Hot topics

    - LDR Report discussion from 1/4ly Milestone Presentation. The discussion was summarized and different topics regarding reporting frequency and format were discussed. A workshop agenda item will be created so discuss the topic each month.

3. Storage Assessments/Data Gap Plans provided to TPA Lead Regulatory Agency Project Managers

    - 105-K East Facility – Presented here and attached to minutes
    - 241-A-702 Ventilation Building and DST report: Presented at ORP TPA PMM on January 25, 2005.

4. Action Item Status (See Attachment 3)

5. Workshop items

    - Consolidation of requirements documents and any other new agreements from workshops (From March 14, 2002 Resolution of Dispute) (discussed new action to prepare a summary of agreements.)

6. Next meeting (date and time): April 19th, 2005, 9:30 – 11:30

Attachment 2

M-026 LDR Report Project Manager Meeting Minutes
at
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Meeting Held February 15, 2005
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Attendance List

Name	Organization
E. Van Mason	Ecology
A. G. Miskho	FH
D. M. Yasek	BHI
G. L. Sinton	RL
W. Russell	ORP
H. T. Tilden	PNNL
E. J. Murphy-Fitch	FH

Attachment 3

M-026 LDR Report Project Manager Meeting Minutes
at
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Richland, Washington
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Actions and Workshop Items

Action #	Responsible Party	Description	Date Closed
02-2003-03	DOE	Consolidate the various requirements for the LDR Report for review and comment by Ecology.	
02-2005-01	DOE-RL	Prepare a list of understandings from previous project management meeting minutes	

Attachment 4

M-026 LDR Report Project Manager Meeting
at
2420 Stevens Center, Conference Room 126
Richland, Washington
Meeting Held February 15, 2005
9:30 am to 11:30 am

105-K East Facility Land Disposal Restrictions (LDR) Storage Assessment

February 1, 2005

MANAGEMENT ASSESSMENT: 105-K EAST FACILITY LAND DISPOSAL RESTRICTIONS (LDR) STORAGE ASSESSMEMT

A management assessment of the 105-K East Facility was initiated in March of 2004 and completed during the 4th Quarter of CY2004. This report discusses the purpose and results of the assessment.

ASSESSMENT PLAN

- **Purpose and Scope**

Three Land Disposal Restrictions (LDR) Storage Assessments for mixed waste (MW) and potential mixed waste (PMW) are required by Volume 1, Table 3-2 of the *Calendar Year 2003 Hanford Site Mixed Waste Land Disposal Restrictions Report* (DOE/RL-2004-07) (CY2003 LDR Report). In accordance with the U. S. Department of Energy – Richland Operations Office (RL) letter of direction dated June 25, 2002 (02-WMD-013), FH has agreed to perform the LDR Storage assessments described in the LDR report related to FH contract scope as management assessments. The three management assessments applicable to the K Basins Closure Project include:

- K Basin East
- K Basin West, and
- The Spent Nuclear Facility Complex.

The three LDR Storage Assessments identified in the CY2003 LDR Report were intended to encompass all the activities within the K Basins Closure Project. The K Basins Closure Project decided to perform the assessments together, but in a step-wise fashion. This assessment report is the first report in a series of three reports and addressed the activities being performed at the 105-K East Facility. The assessment was conducted by the Environmental staff on the K Basins Closure Project with support from the Environmental Protection group. This assessment was to determine the accuracy of the information reported in the annual LDR Report, with the latest report being the CY2003 LDR Report.

The scope of the LDR Storage Assessment is to validate the status of MW and PMW matrices in the 105-K East Facility which consists of the 105-KE Fuel Basin, Transfer Bay, Electrical Equipment Room, Corridor 7, Corridor 10, Chiller Bay, Transfer Corridor, Tool Room, and SWP/Laundry Storage. The outcome of the assessment will identify MW and PMW material that should be included in the LDR report, or to determine whether matrices currently being reported in the LDR Report can be removed from the LDR Report. The only matrix reported in the CY2003 LDR Report from the K Basin Closure Project is "K Basin miscellaneous lead" under the Environmental Restoration Disposal Facility (ERDF) Treatment treatability group. This lead is the lead underwater previously forecasted for treatment at ERDF.

Once this LDR Storage Assessment is approved, it will be presented at the February 2005, Land Disposal Restrictions M-026 Project Managers Meeting and entered in the TPA

Administrative Record. As agreed to during the March 2002 LDR resolution of dispute, the TPA lead regulatory agency will have the opportunity to evaluate the conclusions drawn in the LDR Storage Assessment.

- **Assessment Personnel**

R. T. Winward, K Basin Closure Project, Environmental
A. G. Miskho, LDR Report Coordinator, Environmental Protection

- **Assessment Schedule**

The LDR Storage Assessment was conducted between March 2004 and January 2005.

- **Performance objectives**

The objective of this LDR Storage Assessment was two-fold:

- Determine if MW or PMW exist at the 105-K East Facility that have not been previously identified in the CY2003 LDR report.
- Determine if any of the 105-K East Facility components can be removed from the next annual LDR Report.

Source Documents:

DOE/RL-2004-07, *Calendar Year 2003 Hanford Mixed Waste Land Disposal Restrictions Report,* U.S. Department of Energy, Richland Operations Office, Richland, Washington

Ecology, EPA, DOE, *Hanford Federal Facility Agreement and Consent Order,* as amended, Washington State Department of Ecology, U.S. Environmental Protection Agency, U.S. Department of Energy

40 CFR 268, *Land Disposal Restrictions,* Subpart E, Prohibition on Storage

WAC 173-303, *Dangerous Waste Regulations,* Section 140, Land Disposal Restrictions

"FH management assessment process requirements"

- **Assessment methodology**

The methods used for this LDR Storage Assessment included a kick off meeting, a pre-walkthrough meeting, document review, waste forecast review, interviews, and visual inspection and follow-up inquiries on items in question. The areas within 105-K East Facility were walked down on September 29, 2004 and inspected visually where possible.

Documents reviewed during the assessment include:

HNF-SD-SNF-TI-052, *K Basins Debris Inventory*, Revision 0, April 9, 1997

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HNF-EDC-04-19449, which added Appendix B to HNF-SD-SNF-TI-052, *K Basins Debris Inventory* to include the CY2003 Debris Inventory Update, dated June 7, 2004.

Chemical Inventory by ICG/Code/Location for the 105-K East Facility for FC1-TB-105KE and FC2-TB-105KE

FH Contract with RL, Performance Incentive, *SNF Stabilization and Disposition,* RL-012, June 2004.

The K Basin Closure Project activities have been significantly changed in CY2004 by the June 2004 Project Hanford Management Contract changes. The Project Hanford Management Contract is no longer centered on fuel removal from the basins but rather on the sludge, debris and water removal to close and remove the basins. At the time of the walk through and interviews, the waste forecast for the new contract scope had not been completed. As new forecasts become available, the information regarding the 105-K East Facility in the annual LDR report will be re-evaluated. At the time of the walkthrough, K Basin Closure Project personnel were planning to remove all the equipment and matrices within the 105-K East Facility, finish cleaning out the 105-KE Fuel Basins, grout the matrices remaining in the 105-KE Fuel Basins, cut up the grouted fuel basins, and ship all of this material to ERDF. At the time of the pre-walkthrough meeting, the K Basin Closure Project had not decided what matrices had to be removed from the 105-KE Fuel Basins in order to meet ERDF Waste Acceptance Criteria. The 105-KE Fuel Basins inventory contains the underwater lead in the basins that are currently being reported in the CY2003 LDR Report.

> Note: On November 30, 2004, the WAC 173-303 Dangerous Waste Regulations were amended (effective January 1, 2005). These amendments included incorporation of the Environmental Protection Agency's new LDR treatment standard for radioactively contaminated batteries. After January 1, 2005, radioactively contaminated batteries can be macro encapsulated to meet treatment standards in the State of Washington and therefore can be left in the 105-KE Fuel Basins and grouted with the rest of the debris while still meeting ERDF Waste Acceptance Criteria.

In addition, the plan for the underwater lead has changed. The underwater lead is now planned to be left in place and grouted with the other matrices. The forecast might change, but the current project planning will not involve the removal of the underwater lead for treatment at ERDF.

During the walk through, matrices were evaluated to determine if they were being used, or had a potential use. For matrices not being used, the operator escorting the assessment team indicated what knowledge was available on the matrix being questioned. Additional efforts to evaluate available knowledge of the matrices is viewed as a part of and as a follow up activity to the assessment. Those efforts that could be readily accomplished are reported in this document.

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DATA GAP PLAN

An LDR Storage Assessment must include a data gap plan. This section fulfills the requirements of a data gap plan, pursuant to the TPA under Milestone M-26-01[1]. According to the LDR resolution of dispute dated March 2002, a data gap plan must contain the following:

- What you know and what you don't know
- What you need to know
- Why the level of unknowns is acceptable or not acceptable from a safety basis for the interim until action is planned or that more information is needed to make this determination.

The above data gap plan elements needed to be addressed for the MW and the PMW matrices identified by the LDR storage assessment[2]. The 105-K East Facility LDR storage assessment identified the following MW and PMW matrices:

Mixed Waste and Potential Mixed Waste Matrices
MW – Lead contained underwater in the 105-KE Fuel Basins
PMW – lead in use and not in use
PMW – Removed equipment
PMW – Chemicals in FC1-TB-105KE not in use
PMW – Oil in equipment

What you know and what you don't know

The information presented in this section was obtained from the LDR storage assessment walk through. Follow up information supplied after the walk through was used to answer some questions posed below as indicated in the assessment results section. .

MW – Lead contained underwater in the 105-KE Fuel Basins: Previous planning efforts forecasted the underwater lead to be removed and treated at ERDF. With the new contract changes and the concept of grouting the basins, this matrix is no longer forecasted for removal. Previously generated lead was managed as mixed waste and sent to ERDF for treatment.

PMW - lead in use and not in use: There is a large quantity of lead being used to cover the gratings of the basins and other equipment. There is also a quantity of lead not being used in various locations. A third category of lead exists within equipment, the Ion Exchange

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[1] Letter, Alan E. Hopko, RL, to E. K. Thompson, FH, "Contract No. DE-AC06-96RL13200 – Annual Land Disposal Restriction (LDR) Report Requirements and Notification to Conduct Assessments," 02-WMD-213, #0202987, dated June 25, 2002.

[2] Letter, Sally A. Sieracki, RL, to E. K. Thompson, FH, "Contract No. DE-AC06-96RL13200 – Resource Conservation and Recovery Act (RCRA) Assessment – A&E-SEC-02-009," 02-PMO-0003, #0203878, dated August 19, 2002.

Column (IXC) lead cave in the transfer bay. Both the used and unused lead is being planned for recycle since the lead is encased in a protective covering. The project believes the protective covering can be removed and the lead free-released from radioactive contamination. The possibility also exists to recycle contaminated lead through the national program. Some lead might have to be declared mixed waste if it can not be recycled, but the quantity can not be predicted at this point. Lead can be easily designated as MW when declared waste. No additional information is necessary to manage the lead as MW if declared waste. Because the lead has a high probability of being recycled, there is no need to forecast this matrix as MW. The unused lead meets the definition of PMW.

PMW – Removed equipment: It was not known if the equipment under the wrapping in the Electrical Equipment Room will have to be managed as MW. This equipment is a pump and filter unit brought in by the Pacific Northwest National Laboratory for some testing. The equipment was contaminated and not released. The Project is in the process and getting the equipment removed.

PMW – Chemicals in FC1-TB-105KE not in use: The project keeps a list of the chemicals as part of the chemical management system. It appears that if and when the chemicals are declared waste, that little information is needed to disposition the chemicals. An individual review of the chemical list for waste designation purposes was not performed.

PMW – Oil in equipment: The age of the oil in the equipment appears to be approximated at 1994. Since certain Hanford used oils have been regulated for heavy metals and PCBs, the oil might regulate as MW when removed from the equipment. This equipment is deactivated high pressure equipment being tracked as U04 Utility Isolation-Fuel Storage and Handling: DT*U558 –KE Prep Work Package 04-9195 High Pressure Pump Skid.

What you need to know

MW – Lead contained in the 105-KE Fuel Basins: No additional information is believed to be needed to treat and dispose of the lead in place within the basins.

PMW - lead in used and not in use: For future reporting purposes, the project needs to know what fraction of the lead can be recycled. Lead in use at this time does not need to be reported. Lead not in use needs to be reported in the LDR report as PMW until it is dispositioned.

PMW – Removed equipment: In order to avoid having to report the equipment in the LDR Report, additional information on the equipment must be maintained to show that the equipment would not designate as MW. Until such time, the matrix meets the definition of PMW.

PMW – Chemicals in FC1-TB-105KE not in use: The project needs to know whether the chemicals that have not been used in some time will be used as part of the 105-K East Facility closure process. If not, the project needs to disposition the chemicals that have not been used. These chemicals are inventoried on a frequent basis.

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PMW – Oil in equipment: Determine whether the oil was ever changed out and if any records exists to show how the oil was dispositioned. Otherwise, the oil might need to be sampled in order to determine if it would designate as MW when removed from the equipment.

Why the level of unknowns is acceptable or not acceptable from a safety basis for the interim until action is planned or that more information is needed to make this determination. (Safety basis is used to denote how the regulators view safe management of MW or PMW. This term does not relate to safety basis documentation issued by the KBC Project and approved by RL.)

The level of unknowns regarding the MW and PMW matrices will not result in any concerns regarding the safe management of the matrices. Sufficient information exists so that there are no likely concerns about ignitable, reactive, or incompatible matrix properties. The project's scheduled activities for closure of the 105-K East Facility have been discussed with the TPA lead regulatory agency project manager. Additional discussions are expected after the assessment report/data gap plan is entered into the TPA Administrative Record.

EXECUTIVE SUMMARY

Overall, the information known about the MW and PMW matrices do not warrant concerns about the safety of the matrices. No immediate actions are necessary.

Based on a revised waste forecast and the plans to grout the basins, the lead currently being reported in the LDR Report in the ERDF Treatment treatability group can be removed from the LDR Report

Four PMW categories were identified as part of the assessment. These categories will need to be added to the CY2004 LDR report as PMW.

ASSESSMENT RESULTS

Because of the change in the K Basin Closure Project work scope in CY2004, no findings are being reported in the assessment. Two observations are being reported in the recommendation section.

MW And PMW Matrices

The assessment found the following matrices meeting the definition of MW or PMW for the LDR Report.

MW:

- The lead underwater in the 105-KE Fuel Basins will no longer be reported as forecasted MW in the CY2004 LDR Report since it will be grouted in place.

PMW:

- Lead in use and not in use: The following locations were noted during the assessment: Lead shielding in the Electrical Equipment Room; Lead blankets on the pallet in Corridor 7; and The IXC lead cave in the Transfer Bay which has not been used since the IXMs

were placed in service. This lead needs to be reported in the PMW Table (Volume 1, Appendix C of the LDR report).

- Removed Equipment: Old Equipment in Electrical Equipment Room consisting of a pump and filter unit that is wrapped up. Unless information can be found to show that this equipment will not designate as MW, it needs to be reported in the PMW table until such information is obtained.
- Chemicals in FC1-TB-105KE not in use: In cabinet FC1-TB-105KE in the Transfer Bay, approximately 75% of the products in the cabinet had been there a while. Products not being used that would designate as MW when declared waste need to be reported in the PMW Table.
- Oil in equipment: Deactivated high pressure equipment in the Transfer Bay where oil has not been drained since ~1994. It was not known whether the oil would designate as MW and therefore needs to be reported in the PMW Table.

RECOMMENDATIONS -

Update the LDR report in the next annual update as follows:

Observation 1: Delete the Location-Specific Data Sheet for the K-Basin lead under the ERDR-Treatment treatability group.

Observation 2: Create a row for the 105-K East Facility in the PMW table to identify the PMW matrices.

February 1, 2005
APPROVALS

Management Assessment Approved by:

D. J. Watson, Environmental Compliance Officer — Date: 2/2/2005

R.T. Winward, Assessment Lead — Date: 2/2/05

A. G. Miskho, LDR Report Coordinator — Date: 2/3/05

Chris Lucas, 100 K Facility Management — Date: 2-2-05