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Department of Energy

Richland Field Office

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OCT 27 1992

92-SWT-448

Mr. Paul T. Day
Hanford Project Manager
U.S. Environmental Protection Agency
712 Swift Boulevard, Suite 5
Richland, Washington 99352

Mr. David B. Jansen, P.E.
Hanford Project Manager
State of Washington
Department of Ecology
P.O. Box 47600
Olympia, Washington 98504-7600



Dear Messrs. Day and Jansen:

WASTE RECEIVING AND PROCESSING FACILITY (WRAP) MODULE II RESCOPE

Attached for your consideration is the subject formal Class I Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) Change Control Form. This change request rescopes the WRAP II facility to address the uncertainties of the final waste acceptance criteria for the Waste Isolation Pilot Plant (WIPP), located at Carlsbad, New Mexico. This change request is consistent with the discussions and negotiations between the U.S. Department of Energy (DOE), the U.S. Environmental Protection Agency (EPA), and the State of Washington Department of Ecology (Ecology).

The facility is proposed to be rescoped into a mixed waste treatment module and a transuranic waste treatment facility, thus separating the WRAP II project into two components. The first component maintains the M-19 Milestone project to the original deadline. The second component, with a "To Be Determined" date, slows only that portion of WRAP II which is being delayed because of the WIPP acceptance criteria process.

In a May 4, 1992, letter to EPA and Ecology concerning Single Shell Tanks, DOE discussed the utilization of a procedure for the future in which our organizations work together, informally, in a method which supplements the formal procedures of the Tri-Party Agreement (TPA).

In recent months, DOE has worked with both EPA and Ecology on this issue using the informal process. Discussions and correspondence concerning the constraints and technical issues which have impacted this milestone have been extensively discussed at the Unit Manager and Project Manager levels. DOE has striven to provide timely and open discussion on this matter, including arrangements for site visits for your staffs to the WIPP facility.

93129001210

OCT 27 1992

Messrs. Day and Jansen
92-SWT-448

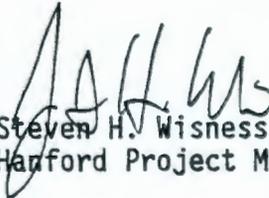
-2-

DOE has reached a point with the WRAP II project which requires decisions be made regarding these projects. The Office of Management and Budget (OMB) has indicated the need to reach agreement on WRAP II. Therefore, DOE is proposing the milestone be changed and request approval of the attached change request.

Since this is a Class I change request, it requires approval by the EPA Region 10 administrator and Ecology director. It is being sent to the EPA and Ecology project managers to facilitate the timely coordination of dispositioning the change request within your organizations. The original change request is being forwarded to Ecology along with the letter. Ecology is requested to disposition the change request and then forward the original to EPA for disposition and return to DOE.

DOE is eager to work together with EPA and Ecology in a spirit of cooperation to provide timely resolution of this issue. Should you have questions, feel free to call me on (509) 376-6798, or June Hennig of the Waste Management Division on (509) 376-1366.

Sincerely,


Steven H. Wisness
Hanford Project Manager

WMD:JMA

Attachment

cc w/att:
D. Rasmussen, EPA
N. Pierce, Ecology
F. Olson, Ecology
B. A. Austin, WHC



93129001211

Change Number

Federal Facility Agreement and Consent Order Change Control Form

Date

M-19-91-1

Do not use blue ink. Type or print using black ink.

October 7, 1992

Originator

Phone

R. D. Pierce

6-5681

Class of Change

I - Signatories

II - Project Manager

III - Unit Manager

Change Title

WRAP Module 2 Milestone Rescope (M-19-00, and M-19-01)

Description/Justification of Change

Due to technical uncertainties associated with the WIPP Waste Acceptance Criteria (WIPP-WAC), portions of the currently planned WRAP Module 2 Project will be delayed. Over the past five months efforts have been made to process Key Decision 0 (KD-0), which allows the start of conceptual design. However, due to continuing uncertainties with the WIPP-WAC, Hanford could not further develop conceptual designs for the TRU portion of the WRAP 2 waste stream until these uncertainties were solved. WIPP may not have a definitive WAC until 1994 or later. Therefore, Hanford proposes to modularize WRAP Module 2 into two sub-modules: 1) a mixed waste treatment unit (called Module 2A) for Low-Level Mixed Waste (LLMW), and 2) Module 2B for TRU waste requiring further treatment including large boxes and remote-handled TRU. Modularization will allow Hanford to proceed with appropriate treatment of LLW where treatment options are clearer, while awaiting necessary acceptance criteria from WIPP on TRU waste.

Impact of Change

The following are the current and proposed milestones:

<u>CURRENT</u>	<u>DESCRIPTION</u>	<u>DUE DATE</u>
M-19-00	Complete WRAP 2 construction and initiate operation	September 30, 1999
M-19-01	Complete WRAP 2 construction	September 30, 1998
PROPOSED:		
M-19-00	Complete WRAP 2A construction and initiate operation	September 30, 1999
The WRAP Module 2A will include waste treatment capabilities for low-level radioactive waste and radioactive mixed waste. WRAP Module 2A is critical to achieving compliance for the management of wastes that are prohibited from land disposal and extended storage.		
M-19-01	Complete WRAP 2A construction	September 30, 1998
M-19-02	Complete Conceptual Design Report for WRAP 2A	September 30, 1992
M-19-03	Complete engineering study to develop alternatives for transuranic treatment and recommendation for treatment (includes WRAP 2B).	March 31, 1993

Affected Documents

Hanford Federal Facility Agreement and Consent Order, Action Plan, Appendix D. Table D-3, and work schedule for Figure D-1.

Approvals

Approved

Disapproved

John D. Wagoner

10/27/92

DOE

Date

EPA

Date

Ecology

Date

93129001212

Federal Facility Agreement and Consent Order Change Control Form

IMPACT OF CHANGES (continued)

The Waste Receiving and Processing (WRAP) Module 2, Project W-100, was scoped to provide characterization, treatment, and packaging to permit permanent disposal of low-level and TRU waste. Waste sources to be treated are newly generated TRU and suspect TRU in containers too large or heavy to be handled in WRAP Module 1, non-thermally treatable LLMW, and all remote-handled TRU and LLMW. The WRAP 2 Facility has been changed to sub-modularize the original facility into two separate facilities and projects. The schedule listed above assumes a 32 month review and approval cycle for the Part B permit application concurrent with design-the initial Part B application submittal is based on the conceptual design with additional detail being provided during the Notice-of-Deficiency cycle .

DESCRIPTION OF CHANGE

The WRAP Module 2 scope remains the same but is sub-modularized into two different facilities and projects. The WRAP 2A Facility retains the original project identification as W-100 and the contact-handled (CH) LLMW treatment capability. The WRAP Module 2A Facility is a 1994 Line Item project. The other half of WRAP Module 2 is provided per the WRAP 2B Facility which has a new project number of W-255. The WRAP Module 2B Facility will provide characterization, treatment, and packaging required to permit permanent disposal of newly generated TRU and suspect TRU in containers too large or heavy to be handled in WRAP Module 1 and all RH-TRU waste and LLMW.

JUSTIFICATION

The design of a facility to process TRU waste to permit disposal at the WIPP is unacceptably risky at this time due to uncertainties associated with the WIPP-WAC and transportation requirements. However, the LLMW treatment portion of the original project scope, WRAP Module 2A, is not dependent on WIPP and is needed immediately to treat waste accumulating in storage since 1987 and waste projected to be generated or received at Hanford over the next twenty years. The TRU treatment capability, WRAP Module 2B, is delayed until resolution of WIPP uncertainties, but is still needed to retrieve and treat RCRA non-compliant suspect TRU waste in below ground storage and permit permanent disposal of TRU waste.

SCHEDULE STATUS

The WRAP Module 2A Functional Design Criteria (FDC) is currently under Westinghouse Hanford Company comment resolution. The WRAP Module 2A Conceptual Design Report (CDR) effort is scheduled to start in February of 1992.

93129001213

CORRESPONDENCE DISTRIBUTION COVERSHEET

Author

Addressee

Correspondence No.

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P. T. Day, EPA
D. B. Jansen, Ecology

Incoming 9207547

Subject: WASTE RECEIVING AND PROCESSING FACILITY (WRAP) MODULE II RESCOPE

INTERNAL DISTRIBUTION

Approval	Date	Name	Location	w/att
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		S. L. Bradley	B3-06	
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		M. M. McCarthy	N3-13	X
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		R. D. Pierce	N3-13	X
		R. J. Roberts	N3-13	X
		J. A. Swenson	G6-45	X
		T. C. Varljen	H5-27	X
		TPA File (M-19)	B2-35	X
		EDMC	H4-22	X



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