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Assessment Report
A&E-SEC-01-016

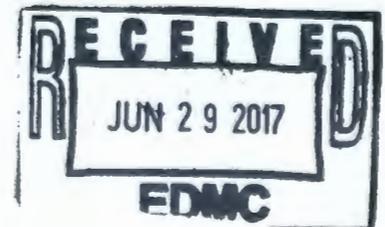
Fluor Hanford, Inc., PUREX Storage Tunnels Environmental

Compliance Assessment
Analysis and Evaluation Division

October, 2001



United States
Department of Energy
Richland Operations Office



0812152
10/19/01

SIGNATURE PAGE

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10/19/01

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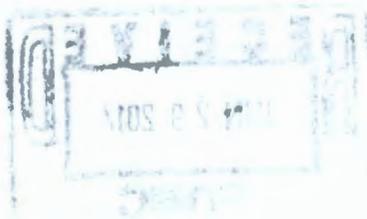
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Steve Chalk

10/19/2001

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Date



EXECUTIVE SUMMARY

The U.S. Department of Energy, Richland Operations Office (RL), Analysis and Evaluation Division (A&E) performed an environmental regulations compliance assessment at PUREX Storage Tunnels during September 24-25, 2001. The scope of the assessment was the contractor's compliance with the Hanford Site Resource Conservation and Recovery Act (RCRA) Permit Number WA7890008967, Part III, Chapter 3, "PUREX Storage Tunnels," requirements covering the treatment and storage of mixed waste.

An entrance meeting was conducted on September 24, 2001, at the Fluor Hanford Inc. (FHI) offices at MO-414 in the 200 East Area. The A&E assessment team, the FHI points of contact, and subject matter experts attended the meeting. The assessment schedule and the areas to be assessed were discussed. An exit meeting was held on October 11th at MO-414.

The assessment concluded no findings and no observations. This assessment is rated as "green" – generally meets requirements.

The facility's management and workers provided the assessment team with individual courtesy and cooperation and demonstrated a commitment to working safely and providing quality service to the Hanford Site.

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1.0 INTRODUCTION AND SCOPE

A. Background

The PUREX Storage Tunnels are permitted as a miscellaneous unit under the Washington Administrative Code (WAC) 173-303-680 treatment, storage and disposal (TSD) unit in the current Hanford Facility RCRA permit because the tunnels are not a typical containerized storage unit. The PUREX Storage Tunnels consist of two structures, 218-E-14 (Tunnel Number 1) and 218-E-15 (Tunnel Number 2). The tunnels are used for the railcar storage of material from the PUREX Plant and from other onsite sources. The material stored in the tunnels contains dangerous waste and varying amounts of radioactive contamination; therefore, the storage material is managed as mixed waste. The PUREX Storage Tunnels branch off from the PUREX plant railroad tunnel. Tunnel Number 1 is filled to capacity. Tunnel Number 2 currently has storage positions available and may continue to receive mixed waste from the PUREX Plant and other onsite sources until the tunnel is either filled to capacity or a determination is made that waste will no longer be received.

There are no electrical utilities, water lines, drains, fire detection or suppression systems, radiation monitoring, or communication systems provided inside the PUREX Storage Tunnels. PUREX Storage Tunnels are in the surveillance phase. The surveillance mission involves quarterly surveillance of the structures by external visual inspections; no entries are made into tunnels to perform inspections. The principle hazards at the PUREX Storage Tunnels are related to the inventory of radioactive material as stated above.

B. Assessment

This assessment covers the permittee's program for compliance with the RCRA Permit requirements pertaining to the receipt, handling, storage, and treatment of mixed waste at the facility. The purpose of this assessment was to:

- Evaluate the facility for compliance with the Hanford Facility RCRA Permit Number WA7890008967;
- meet a commitment of the Department of Ecology "Final Determination Pursuant to the Hanford Federal Facility Agreement and Consent Order (HFFACO) regarding the U.S. Department of Energy's (DOE) compliance with the Land Disposal Restriction (LDR) Requirements of Washington State's Hazardous Waste Management Act (HWMA);
- evaluate the facility for compliance with the Federal Resource Conservation and Recovery Act (RCRA), and;

- provide information for DOE's Annual Land Disposal Restrictions (LDR) Report (HFFACO Milestone M-26-01)."

Third party assessments are conducted by DOE to evaluate the total picture of how well the Hanford contractors (in this case, FHI) management system complies with the applicable regulatory requirements and standards. This assessment was applied using a graded approach. The assessment was tailored to the specific activities being performed at the PUREX Storage Tunnels.

2.0 METHODS

An assessment entry meeting was held at MO-414 in the 200 East Area on September 24, 2001. The assessment team members were identified. The purpose of the assessment was declared and the scope of the assessment was described. The conduct of the assessment was reviewed along with the assessment schedule. The assessment was conducted using the process of A&E procedure A&E-01, "Evaluation of Contractor Performance in Meeting Waste Management Storage Requirements"

The method used for this assessment was a combination of document review and interviews. Since the PUREX Storage Tunnels are sealed for routine entries, no walkdowns were conducted inside the tunnels by the assessment team. The outside of the facility was inspected and regulatory documents were reviewed to develop the areas of primary focus for the assessment. The documents used to develop the checklist for the assessment included Part III, Chapter 3, "PUREX Storage Tunnels," of the permit, WAC 173-303, 40 CFR, RL Facility Representative surveillances, contractor self-assessments, and independent assessments. This assessment focused on the following specific areas:

DOE/RL-90-24, Revision 7, "Hanford Facility Dangerous Waste Permit Application, PUREX Storage Tunnels"

- Facility records;
- procedures;
- facility contingency plan;
- personnel training and qualification;
- waste analysis plan;
- operating log and log-keeping practices;
- facility security; and

- self (management and independent) assessments.

The RL Contractor Oversight and Evaluation Planning process provides the mechanism whereby RL personnel (mission element, mission support, and support service) evaluate contractor performance to ensure work is performed in accordance with the applicable requirements. This process also provides the mechanism to evaluate the adequacy of the contractors' management and independent assessment program and fulfills an important part of the feedback and improvement function of the RL Integrated Management System (RIMS). This process supports implementation of DOE M 411.1A, "Safety Functions, Responsibilities and Authorities Manual," DOE P 450.5, "Line Environment, Safety, and Health Oversight," and DOE O 224.1, "Contractor Performance Based Business Management Process."

Assessment Team Members

Dave Roha of the RL Analysis and Evaluation Division led the assessment and Steve Chalk was a team member.

3.0 RESULTS

A. GENERAL

- 1) General operations (Permit Section II.O): The facility's general housekeeping was maintained. There was no evidence of discarded waste containers, remains of labels or residual waste equipment, or unpermitted waste discharges. The facility is considered adequate for continued safe waste storage. Documents reviewed:

- Quarterly Surveillance Data Sheets.

No issues were found.

- 2) Inspections (WAC-173-303-320): There was a written facility inspection plan with specified frequencies. Evidence was present that indicated the quarterly operator rounds were performed and documented as required. Documents reviewed:

- FO-040-005, Revision A, Mod 1, Plant Operating Procedure, "Quarterly Surveillance of the PUREX Storage Tunnels."

No issues were found.

B. SPECIFIC

- 1) Facility Records (WAC-173-303-380): The facility records of the data related to the quarterly (walkabout) inspections were reviewed. Documents reviewed:

- FO-040-005, Revision A, Mod 1, Plant Operating Procedure, "Quarterly Surveillance of the PUREX Storage Tunnels;" and
- Facility operations logbook.

No issues were found.

- 2) Procedures (WAC-173-303-320 (1)(2)): Procedures for PUREX storage tunnels covering waste and facility surveillance and maintenance were reviewed. Document reviewed:

- FO-040-005, Revision A, Mod 1, Plant Operating Procedure, "Quarterly Surveillance of the PUREX Storage Tunnels."

No issues were found.

- 3) Facility Contingency Plan (WAC 173-303-340 & 350): The facility's emergency preparedness plan was established. However, because personnel only enter the storage tunnels during material placement operations, no permanent emergency equipment, communications equipment, warning systems, personal protective equipment or spill control and containment supplies were located in the tunnels or surrounding areas. The quarterly facility inspection team uses cell phones for communications for emergency notifications. Document reviewed:

- HNF-IP-0603-E-14/15, Revision 1, "Supplemental Unit-Specific Contingency Plan for the 218-E-14 and 218-E-15 Storage Tunnels."

No issues were found.

- 4) Personnel Training and Qualifications (WAC-173-303-330): Training records indicated that the training coordinator was assigned, that applicable courses were listed, and personnel requiring training in their particular areas were current as required in the permit. The written training plan had the necessary content, training frequencies and training techniques. Job descriptions were matched to the training requirements covering requisite skills, education, qualifications and duties for each position. It was clear that the training was relevant to the positions. Documents reviewed:

- HNF-IP-0929, Rev. 5, "Dangerous Waste Training Plan for the PUREX Storage Tunnels;" and
- Training records for two of three Nuclear Chemical Operators (NCOs) that had completed recent facility quarterly inspections.

No issues were found.

- 5) Waste Analysis Plan (WAC-173-303-300): The Waste Analysis Plan (WAP) was reviewed. Document reviewed:

- HNF-SD-EN-WAP-007, Rev.4, Waste Analysis Plan for PUREX Storage Tunnels.”

No issues were found.

- 6) Operating Logs and Log-keeping Practices (WAC-173-303-320 (2)): The PUREX Storage Tunnels logbooks from operations and radiation control were reviewed and found acceptable. The necessary entries were made in the appropriate logbook whenever safety and process equipment inspections and radiation protection activities were performed. Documents reviewed were:

- Current operations logbook; and
- Radiation Survey Report No. RC01036

No issues were found.

- 7) Facility Security (WAC-173-303-310): Facility surveillance sheets were reviewed. The facility has posted the correct warning signs on the outside of the facility and at all entry points. The doors and gates to the secured areas were locked. The team observed personnel exiting an adjacent fenced area. Correct procedures were used to secure the facility.

No issues were found.

- 8) Self (management and independent) Assessments (DOE P 450.5): The assessment team identified that there were no contractor self (management) assessments performed during the previous 12 months. The contractor independent assessment organization Facility Evaluation Board completed an assessment in December of last year. No findings were identified concerning the PUREX Storage Tunnels.

The team noted that within the past year there has been one independent DOE oversight activity by the Facility Representative, although the surveillance was not related to LDR oversight activities. The Facility Representative surveillance and result is listed as follows:

Surveillance number S-01-OOD-200ADP-004: Documented review of radiological work practices during 200ADP work activities. No adverse findings were identified.

No issues were found, however the assessment team may perform a followup review of the River Corridor Project Management self-assessment program during a later assessment.

4.0 FINDINGS AND OBSERVATIONS

A. NO FINDINGS OR OBSERVATIONS WERE IDENTIFIED

5.0 PERSONNEL CONTACTED

G. J. LeBaron, FHI
G. B. Chronister, FHI
R. K. Moe, FHI