



Department of Energy

Richland Field Office

P.O. Box 550

Richland, Washington 99352

9300232

93-TPA-036

DEC 18 1992

Mr. Paul T. Day
 Hanford Project Manager
 U. S. Environmental Protection Agency
 Region 10
 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,

HANFORD FEDERAL FACILITY AGREEMENT AND CONSENT ORDER (TRI-PARTY AGREEMENT)
 CHANGE REQUEST FORM M-05-92-05, COMPLIANCE ISSUES WITH SINGLE-SHELL TANK (SST)
 241-T-101.

- Ref: (1) Letter, R. Stanley, Ecology, to J. D. Wagoner, RL, no subject, dated November 12, 1992
- (2) Letter, J. D. Bauer, RL, to R. Stanley, Ecology, HANFORD FEDERAL FACILITY AGREEMENT AND CONSENT ORDER MILESTONE CHANGE REQUEST M-23-92-XX, RESPONSE, 93-TPA-027 dated November 19, 1992 0024779
- (3) Letter, S. H. Wisness, RL, to P. T. Day, EPA, and D. B. Jansen, Ecology, HANFORD FEDERAL FACILITY AGREEMENT AND CONSENT ORDER MILESTONE CHANGE REQUEST M-23-92-XX, RESPONSE, 93-TPA-034 dated December 8, 1992 0025322
- (4) Letter, R. Stanley, Ecology, to J. D. Wagoner, RL, ECOLOGY LETTER DATED 11/12/92 REGARDING SINGLE-SHELL TANK 241-101-T VIOLATIONS, dated December 10, 1992 ✓

Reference 1 provided to the U.S. Department of Energy, Richland Field Office (RL), the draft Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) change request form M-23-92-XX, "Establish additional Interim milestones for single-shell tank 241-101-T to achieve compliance with interim status requirements," as generated by the State of Washington Department of Ecology (Ecology). That letter, although not specific in its reference to particular paragraphs of the Tri-Party Agreement, was considered by RL to



refer to Article VII, WORK, paragraph 28. The applicability of Paragraph 28 was acknowledge by Roger Stanley in a meeting between RL and Ecology on December 3, 1992. Reference (2) acknowledged that change request and urged discussions commence between RL and Ecology and the U.S. Environmental Protection Agency (EPA). Reference (4) acknowledged progress resulting from the series of meetings, noting the willingness of the parties to work towards resolution of this issue, and stating that the deadline for issue resolution was December 18, 1992.

In efforts to resolve the issues contained within reference (1), RL met with representatives of Ecology on December 3, 9, 15, and 17, 1992. A representative of EPA participated in the December 15 and 17, 1992, meetings. Closure on all issues has been achieved through these meetings and resulted in the establishment of scope and schedules for all proposed milestones.

RL will make all reasonable efforts to resolve the issues associated with the safety questions which concern this tank, including criticality and ferrocynide content to assure that pumping can be directed consistent with maintaining safe conditions around the tank and the preservation of human health and the environment. The issues have been formally communicated to Ecology and EPA in prior change requests and issue papers concerning Tri-Party Agreement milestone M-05-00, complete SST Stabilization. This change request is currently in dispute resolution.

In order to comply with the Ecology-imposed deadline of December 18, 1992, and to document RL's good faith efforts at resolving this issue, enclosed please find Tri-Party Agreement Change Control Form, M-05-92-02E, "Remedial actions necessary for assumed leaking SST Tank 241-T-101," signed by the RL Hanford Project Manager. Pursuant to the Tri-Party Agreement, Article VII, WORK, paragraph 28, this change request provides the RL statement on what actions RL will take and the schedule for those actions.

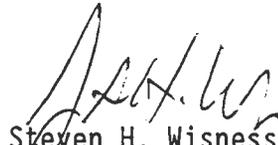
The original change request is being forwarded to Ecology for disposition. Ecology is requested to sign the change request and to forward it to EPA for approval. Upon approval by all three parties this change request will be in effect, in accordance with the procedures outlined in the Tri-Party Agreement.

Messrs. Day and Jansen
93-TPA-036

-3-

If you have any questions on this, please contact me on (509) 376-6798, or Mr. Gary Bracken, RL Tank Farm Operations, on (509) 373-5219.

Sincerely,



Steven H. Wisness
Hanford Project Manager

EAP:JKY

Attachment

cc w/ attach:
B. Austin, WHC
S. McKinney, Ecology
T. Michelena, Ecology
D. Nylander, Ecology
D. Sherwood, EPA
R. Stanley, Ecology
T. Tebb, Ecology



HANFORD FEDERAL FACILITY AGREEMENT AND CONSENT ORDER
CHANGE CONTROL FORM
M-05-92-05.E

=====

Add the following interim milestones to M-05-00, Complete single-shell tank interim stabilization, for identified tasks for resolution to the assumed leaking Tank T-101.

<u>Milestone/ Due Date</u>	<u>Description</u>
M-05-14 Mar. 1993	The USDOE shall provide to EPA and Ecology an initial comprehensive report on the alternatives identified in the Engineering Evaluation of Alternatives. The report shall discuss the feasibility of alternatives identified, costs, obstacles, accelerated implementation time schedules, and resources to implement the appropriate alternative. The report will emphasize the near-term options.
M-05-15A Jan. 1993	The USDOE shall upgrade in-tank monitoring at single-shell tank T-101 by replacing the existing FIC or providing a manual flake box type in-tank monitoring device in the interim to pumping.
M-05-15B Mar. 1993	The USDOE shall provide to EPA and Ecology a letter report on in-tank liquid level detection options available for tank T-101 consistent with the requirements of Chapter 173-303 WAC. If the liquid level remains in this tank, an accelerated implementation schedule for the installation of the preferred option for in-tank liquid level detection shall be provided within sixty (60) days of this milestone due date.
M-05-16 Mar. 15, 1993	The USDOE shall complete all physical preparations for emergency pumping of single shell tank T-101, and shall initiate full scale removal of tank T-101 liquids.
M-05-17A Jun. 1994	The USDOE shall provide to EPA and Ecology the draft curricula for the upgraded Maintenance Training program and an implementation schedule for that training.
M-05-17B Dec. 1993	The USDOE shall complete the portions of the Nuclear Operator systems class and on-the-job training that relate to the Operator Routines and Liquid Level Monitoring. Documentation of completion of Operator training shall be provided by submittal of a letter from USDOE to EPA and Ecology.
M-05-17C Jun. 1993	The USDOE shall provide to EPA and Ecology the schedule for completing the training for all Operations Supervisors and Shift Managers in accordance with the upgraded Supervisor Training Program. Documentation of completion of the first class for Operations Supervisors and Shift Managers will also be provided.

HANFORD FEDERAL FACILITY AGREEMENT AND CONSENT ORDER
CHANGE CONTROL FORM
M-05-92-05.E
(continued)

=====

Add the following interim milestones to M-05-00, Complete single-shell tank interim stabilization, for identified tasks for resolution to the assumed leaking Tank T-101 (continued).

Milestone/
Due Date

Description

- | | |
|-----------------------|---|
| M-05-18A
Jan. 1993 | The USDOE shall provide to EPA and Ecology the revised data sheets and administrative procedures relevant to monitoring single-shell tank T-101 liquid level detection instruments and identifying and reporting out of specification readings. |
| M-05-18B
Jan. 1993 | The USDOE shall provide to EPA and Ecology the revised procedures to accomplish controlling and tracking Discrepancy Reports generated to document adverse trends or data anomalies in the Hanford Tank Farm Operations. |

CORRESPONDENCE DISTRIBUTION COVERSHEET

Author	Addressee	Correspondence No.
S. H. Wisness, RL	P. T. Day, EPA D. B. Jansen, Ecology	Incoming 9300232
Subject: HANFORD FEDERAL FACILITY AGREEMENT AND CONSENT ORDER (TRI-PARTY AGREEMENT) CHANGE REQUEST FORM M-05-92-05, COMPLIANCE ISSUES WITH SINGLE-SHELL TANK (SST) 241-T-101.		

INTERNAL DISTRIBUTION

Approval	Date	Name	Location	w/att
		Correspondence Control	A3-01	X
		President's Office		
		B. A. Austin	B2-35	X
		M. L. Bell	T6-16	X
		G. T. Berlin	R1-51	X
		T. D. Blankenship	R2-30	X
		R. J. Bliss	B3-04	X
		V. C. Boyles	R1-49	X
		S. L. Bradley	B3-06	
		C. Defigh-Price	R2-31	X
		J. L. Deichman	B1-59	X
		G. T. Frater	R1-51	X
		J. C. Fulton	R2-31	X
		J. S. Garfield	H5-49	X
		C. J. Geier	B2-19	X
		S. D. Godfrey	R1-51	X
		V. W. Hall	B1-59	X
		D. G. Hamrick	R1-51	X
		H. D. Harmon (Level 1)	R2-52	X
		G. W. Jackson	B2-35	X
		D. L. Lenseigne	R2-75	X
		P. J. Mackey	B3-15	X
		H. E. McGuire	B3-63	X
		M. A. Mihalic	L4-88	X
		W. C. Miller	S4-55	
		G. J. Miskho	R2-50	X
		D. J. Newland	S4-55	X
		S. B. Pabst	B2-35	X
		M. A. Payne (Assignee)	R2-50	X
		P. R. Praetorius	B3-55	X
		J. G. Propson	E2-18	X
		T. E. Rainey	R1-49	X
		R. E. Raymond	R1-80	X
		J. H. Roecker	B1-59	X
		J. D. Thomson	R1-30	X
		R. K. Welty	R1-80	X
		IPA File/LB (M-05)	B2-35	X
		EDMC	H6-08	X

