

# START

## Meeting Minutes Transmittal

PUREX DEACTIVATION MEETING  
Federal Building, Room 784B  
Richland, Washington

July 26, 1993  
8:00 a.m. - 10:00 a.m.

The undersigned indicate by their signatures that these meeting minutes reflect the actual occurrences of the above-dated meeting.

*Randall N. Krekel* Date: 9-28-93  
Randall N. Krekel, DOE-RL, EAP

*Dennis J. Washenfelder* Date: 9-28-93  
Dennis J. Washenfelder, WHC, PUREX

*G. Thomas Tebb* Date: 9-28-93  
G. Thomas Tebb, Ecology

*Daniel L. Duncan* Date: 9-28-93  
Daniel L. Duncan, EPA Region 10

Purpose: Discuss PUREX Deactivation Process

Meeting Minutes are attached. The minutes are comprised of the following:

- Attachment 1 - Agenda
- Attachment 2 - Summary of Discussion and Commitments/Agreements
- Attachment 3 - Attendance List
- Attachment 4 - Action Items
- Attachment 5 - Draft Letter to Ecology and EPA from RL



9313042-0430

Attachment 1

PUREX DEACTIVATION MEETING  
Federal Building, Room 784B  
Richland, Washington

July 26, 1993  
8:00 a.m. - 10:00 a.m.

Agenda

PROPOSED DEACTIVATION ACTIVITIES

- Technical Questions and Answers

REGULATORY CONCERNS

- Schedule
  - Dates for activities and key decisions
  - Three-year duration
- Air Permitting
  - DOH involvement
  - Ecology involvement
- RCRA Permitting
  - NOI
  - Part A
  - Closure Plan
  - Regulatory Oversight
- Liquid Effluents
  - Quantity of wastes compared to during operation
  - Permitting

ACTION ITEMS

- Past action items
- New action items

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## Attachment 2

### PUREX DEACTIVATION MEETING Federal Building, Room 784B Richland, Washington

July 26, 1993  
8:00 a.m. - 10:00 a.m.

#### Summary of Discussion and Commitments/Agreements

#### PROPOSED DEACTIVATION ACTIVITIES

- Technical Questions and Answers

At Mr. D. Duncan's (EPA) request, Mr. G. LeBaron (WHC) and Mr. R. Bowman (WHC) provided brief presentations regarding PUREX deactivation. Both of these presentations were given at the previous PUREX meeting held July 13, 1993.

During Mr. LeBaron's presentation, which consisted of proposed PUREX deactivation activities, Mr. Duncan asked if WHC had any plans to use PUREX as a part of the effort to clean out the K-Basins. Mr. LeBaron responded that there were no plans to use PUREX for that purpose. Mr. Duncan continued to inquire about the waste in K-Basins, and Mr. L. Romine (RL) indicated that the K-Basins are being addressed separately from the PUREX issue. Mr. Duncan then asked if the waste minimization activities outlined in Mr. LeBaron's presentation were in the proposal stage or if these were planned activities. Mr. LeBaron explained the waste minimization is a proposal until RL/WHC can obtain the acceptance of the regulators.

Mr. Bowman then proceeded to give his presentation regarding RCRA issues associated with PUREX deactivation activities. Mr. Bowman explained that PUREX will be closed using a phased approach. Phase I closure activities associated with interim status TSD vessels will be addressed in the RCRA closure plan, which is due to be submitted to the regulators by July 1995. All Phase I closure activities (including closure of vessels and equipment not permitted under interim status) will be addressed in a separate document, identified as a project management plan, and a draft of that document is due to RL by the end of September 1993. Mr. Duncan questioned the rationale for the established due date of July 1995 for the closure plan, and suggested the possibility of setting the date for an earlier time frame. The Phase II closure activities will be contingent upon the following: land use planning decisions, record of decision for Hanford Site Remedial Action Environmental Impact Statement, and decontamination and decommissioning funding allocations. Mr. Duncan inquired about the time frames regarding these contingencies, and it was pointed out that scheduling information developed for January and April 1993 meetings had already been transmitted to Mr. Duncan. Mr. F. Ruck III (WHC) noted that the

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closure schedule is definitive for the next three years, but that it is not so well defined for the period beyond Phase I (deactivation).

Mr. Bowman then addressed WAC 173-303 compliance issues regarding in-process materials. RL/WHC propose to co-precipitate plutonium/uranium-bearing residues currently in Tanks D5 and E6 as a Phase I closure activity. Storage of the waste in these tanks and treatment of this material by co-precipitation are not included in the PUREX Part A permit application, and a lengthy discussion ensued regarding this exclusion. Mr. Bowman explained that a notice of intent (NOI) would be required to include these activities, which would entail a 13-month process (based on past experience).

Other RCRA issues associated with deactivation (sugar denitration, concentration of solutions in the F11 Concentrator, and storage of mixed waste) were discussed. Mr. LeBaron indicated a desire to initiate deactivation activities in October 1993 and stressed that the activities would be of relatively short duration.

Mr. G. T. Tebb (Ecology) stated that a year or more could be required for some of the activities and expressed a concern that activities of such duration should be covered under interim status. Mr. Tebb indicated that he would be looking the possibility of shortening the normal 13-month NOI process.

Mr. Tebb and Mr. Duncan both expressed concern about waiving the inclusion of mixed waste storage and treatment by co-precipitation in the Part A. Ms. S. Price (WHC) pointed out that these activities would be covered in the project management plan, which EPA and Ecology would have the opportunity to review. Mr. Bowman also pointed out the proposal to establish Tri-Party Agreement milestones to accomplish these various activities, thereby enabling the regulatory agencies to have some control. The milestones could also be used to provide the documentation, in lieu of a Part A, for these activities. Mr. LeBaron further explained there were problems associated with identifying which aspects of treating and storing the waste should be permitted. Additionally, inclusion of additional activities in the Part A would have ramifications on final closure and administrative requirements.

Mr. Duncan suggested that the involved parties review the information provided to date (including a draft letter provided at this meeting, Attachment 5) and then set up a meeting to discuss their specific concerns further.

Mr. Tebb commented for information that Ecology reviewed the revised Part A permit application for T Plant within ten days, and stated that with the proper resources the anticipated lengthy administrative process could be avoided.

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## REGULATORY CONCERNS

- **Schedule**

Mr. D. Washenfelder (WHC) provided the status of scheduling information, which was requested by Mr. Tebb. When the draft project management plan is submitted to RL at the end of September 1993, WHC expects to have available the schedules and the cost estimates for completing the job in three years, and also to have confirmed the initial key decision dates.

Mr. Tebb had inquired previously about the three-year proposed time period for the deactivation of PUREX. Mr. Washenfelder explained that a U.S. Department of Energy "Red Team" had been established to evaluate how PUREX could be deactivated quickly. The "Red Team" looked at the technical activities and made some simplifying assumptions to reduce the length of time required to deactivate the plant, thereby reducing the period during which huge costs would be accumulated to conduct surveillance and maintenance activities. The "Red Team" concluded that the plant could be deactivated within three years. Both Ecology and EPA stressed the importance of completing deactivation within the scope of the regulations.

- **Air Permitting**

Mr. Tebb had raised a concern that air permitting requirements triggered by the deactivation activities may impede the progress of the three-year schedule. Mr. Tebb emphasized that in order to meet this aggressive three-year schedule, RL/WHC need to ensure the early involvement of the Departments of Health and Ecology and EPA. Mr. Tebb suggested the regulators meet separately from RL/WHC to discuss this project. Mr. Tebb noted that Mr. R. King (Ecology) will be handling the air permit for Ecology.

- **RCRA Permitting**

Mr. Tebb suggested that WHC should be preparing a notice of intent (NOI), and Mr. Bowman indicated WHC had been working on an NOI. It was noted that a separate NOI was issued for PUREX in March 1992. It was suggested that the March 1992 NOI could be used as a framework for developing a new NOI. Mr. Tebb indicated that in-house discussions regarding shortening the 13-month NOI process had been inconclusive thus far.

Mr. Tebb inquired about the status of WHC's screening process regarding NEPA. Mr. Washenfelder explained that PUREX has an environmental impact statement (EIS) that was published in 1983 for restart of the plant. WHC has grouped the proposed activities and prepared a set of NEPA screening forms. RL will use these forms to make an initial assessment of whether or not the EIS adequately addresses the activities. WHC/RL are planning to meet this week regarding the screening process. Mr. Tebb requested the results from the screening, noting Ecology sometimes must make

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regulatory decisions for Hanford Site activities without adequate backup information.

Mr. Tebb expressed an interest in the extent of regulatory oversight and authority to change or modify the processes that will be conducted during deactivation. Mr. Tebb provided an example when Ecology performed sampling at the UO<sub>3</sub> Plant, which enabled Ecology to verify RL/WHC's documentation. Mr. Tebb pointed out this parallel sampling also provides the public with assurances regarding verification of documentation.

- **Liquid Effluents**

Mr. Tebb inquired about how the closure of the 216-B-3 Pond System and Project C-018 activities would be affected by the effluent directed to those units. Mr. S. Skurla (WHC) stated there are interim operating restrictions identified in the Ecology Liquid Effluent Consent Order for the PUREX streams that will result from the deactivation activities, and all indications are that the PUREX discharge will remain within the limits of those restrictions. Mr. Tebb requested written documentation regarding this information. Mr. Skurla also confirmed that PUREX deactivation will not impact Project C-018. Mr. Tebb asked about additional tritium being generated as a result of the PUREX deactivation process, noting that this was a concern the public had with regard to Project C-018. Mr. LeBaron responded that no additional tritium would be generated; that what is being proposed with the treatment at PUREX is to minimize the waste going to Double Shell Tanks, which would minimize the waste going to the C-018 Treatment Facility. Mr. Peiffer estimated that PUREX discharges during deactivation would be at only 5 to 10 percent of the levels seen when the plant was operating.

Mr. Tebb stated that the intent of his questions was to ensure that an effort is being made to consider impacts to other activities onsite and to coordinate RCRA and other permitting activities. Mr. Skurla stated that, per the Ecology Liquid Effluent Consent Order, PUREX discharges to the environment will continue to go to the 216-B-3 Pond System until June 1995, at which time they will be rerouted to Project W-049. Mr. Skurla added that deactivation would require minor modifications to be made to the Project W-049 BAT/AKART document, submitted in early 1992.

Mr. Duncan brought up the subject of creating a new milestone for PUREX, and Mr. Romine indicated that his management has been reluctant to buy into adding another milestone for PUREX. Mr. Tebb pointed out that the milestone would provide funding to be directed at this project, and also a type of regulatory control to enforce the three-year schedule. Mr. Tebb then referred to the handout from Mr. LeBaron's presentation titled PUREX Deactivation, noting one of the goals of deactivation is to "free up standby resources for other Hanford environmental cleanup activities."

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Mr. Tebb suggested that the involved parties strive to achieve the intent of this goal.

## **ACTION ITEMS**

- **Past Action Items**

The following RL/WHC action items from the previous PUREX deactivation meeting held July 13, 1993 were closed:

Action item 7-13-93:1, RL/WHC will provide Mr. Tebb with a copy of the PSD permit;

Action item 7-13-93:2, RL/WHC will fax Tom Tebb (Ecology) a copy of the letter notifying Ecology of a workshop meeting and considering additional support from Ecology;

Action item 7-13-93:3, RL/WHC will draft a letter to send to Ecology identifying key issues, time lines, resource requirements, and proposed resolution.

Ecology also had three action items from the previous PUREX deactivation meeting held July 13, 1993:

Action item 7-13-93:4, Ecology will examine the possibility of a TPA milestone (closed);

Action item 7-13-93:5, Ecology (T. Tebb) will review the Part A, (ongoing);

Action item 7-13-93:6, Ecology will request additional support for PUREX from management (closed). Mr. Tebb reported that he met with Ecology management (Dru Butler, Roger Stanley, Dave Jansen, and Toby Michelena) and a representative from the Department of Health and briefed them on the PUREX deactivation process and the results of meetings held thus far regarding deactivation. Mr. Tebb indicated that although the group was divided in its opinion, the overall impression was positive, and the group determined that it was important to proceed with the project.

- **New Action Items**

Mr. Tebb and Mr. Duncan set up a meeting between the two agencies for August 11, 1993, and RL/WHC took an action to provide a working schedule to Ecology and EPA before their meeting. Ecology and EPA took an action to outline their position resulting from the August 11, 1993 meeting at the next PUREX deactivation meeting, scheduled August 16, 1993. Mr. Tebb took an action to identify what kind of flexibility Ecology might have to abbreviate the NOI process.

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Attachment 3

PUREX DEACTIVATION MEETING  
Federal Building, Room 784B  
Richland, Washington

July 26, 1993  
8:00 a.m. - 10:00 a.m.

Attendance List

<u>Name</u>	<u>Organization</u>	<u>Phone #</u>
John A. Bates	WHC	376-2088
Ravi K. Bhatia	WHC	372-2720
Roger C. Bowman	WHC	376-4876
Dan L. Duncan	EPA	553-6693
Kathleen E. Knox	WHC	372-3596
Randall N. Krekel	RL	376-4264
Jeff J. Luke	WHC	376-8629
Gregory J. LeBaron	WHC	373-1792
Bill A. Peiffer	WHC	373-4840
Sue M. Price	WHC	376-1653
Julie R. Robertson	WHC	376-8162
Larry D. Romine	RL	376-4747
Fred A. Ruck	WHC	376-9876
Steve J. Skurla	WHC	376-1102
Edward H. Smith	WHC	376-0234
G. Thomas Tebb	Ecology	736-3020
Dennis J. Washenfelder	WHC	373-2641

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Attachment 4

PUREX DEACTIVATION MEETING  
Federal Building, Room 784B  
Richland, Washington

July 26, 1993  
8:00 a.m. - 10:00 a.m.

Action Items

<u>Action Item</u>	<u>Description</u>
07-13-93:1	WHC/RL will provide Tom Tebb (Ecology) a copy of the PSD permit.  CLOSED
07-13-93:2	WHC/RL will fax Tom Tebb (Ecology) a copy of the letter notifying Ecology of a workshop meeting and considering additional support from Ecology. ACTION: D. Brown (RL)  CLOSED
07-13-93:3	WHC/RL will draft a letter to send to Ecology identifying key issues, time lines, resource requirements, and proposed resolutions.  CLOSED
07-13-93:4	Ecology will examine the possibility of a TPA milestone. ACTION: T. Tebb (Ecology)  CLOSED
07-13-93:5	Ecology will review the Part A. ACTION: T. Tebb (Ecology)  OPEN
07-13-93:6	Ecology will request additional support for PUREX from management. ACTION: T. Tebb (Ecology)  CLOSED
07-26-93:1	RL/WHC will provide a working schedule to EPA and Ecology prior to their August 11, 1993 meeting.
07-26-93:2	Ecology and EPA will outline their position resulting from the August 11, 1993 meeting at the next PUREX deactivation meeting, scheduled August 16, 1993.

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07-26-93:3

Mr. Tebb will identify what kind of flexibility Ecology might have to abbreviate the NOI process.

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**Attachment 5**

**PUREX DEACTIVATION MEETING  
Federal Building, Room 784B  
Richland, Washington**

**July 26, 1993  
8:00 a.m. - 10:00 a.m.**

**Draft Letter to Ecology and EPA from RL**

9313042.0440

Ms. Dru Butler, Program Manager  
Nuclear and Mixed Waste Management  
State of Washington  
Department of Ecology  
P.O. Box 47600  
Olympia, Washington 98504-7600

Dear Ms. Butler:

DEVELOPMENT OF PUREX DEACTIVATION REGULATORY COMPLIANCE APPROACH

In mid-April 1993, efforts were initiated to develop a mutually agreeable regulatory compliance approach among the U.S. Department of Energy, Richland Operations Office (RL), the U.S. Environmental Protection Agency (EPA), the Washington State Department of Ecology (Ecology), and the Washington State Department of Health for the deactivation of the Plutonium-Uranium Extraction (PUREX) Plant. The purpose of this letter is two-fold: (1) to outline Ecology support that will be needed to continue this effort; and (2) to identify regulatory issues that will need to be resolved in the near-term. Both topics were recently discussed with Mr. G. T. Tebb of your staff in a meeting held on July 13, 1993, in Richland, Washington. We appreciate Mr. Tebb's involvement in this meeting and in the PUREX Deactivation Workshop held on April 12-15, 1993. Also appreciated is his recognition that such meetings provide an opportunity to forge a regulatory approach applicable not only to PUREX deactivation, but also to other similar Hanford Site facilities.

The PUREX Plant will be dealt with in two phases: deactivation (Phase I), and decontamination and decommissioning (Phase II). The goal of the Phase I activities is to reduce risks to human health and the environment from the PUREX Plant by removing process liquids from the plant, shutting off utilities to the building, consolidating ventilation systems, and removing all need for personnel entry into the building. Deactivation is currently scheduled to commence in October 1993, although certain activities may commence as early as August 1993, contingent on the availability of resources and receipt of required regulatory concurrences and/or approvals. To support this aggressive schedule, key regulatory compliance issues must be resolved before the end of fiscal year 1993.

We recognize that as Phase I activities proceed, additional questions regarding Resource Conservation and Recovery Act of 1976 (RCRA) and air permitting issues will arise. These questions will require timely responses from Ecology. We currently anticipate that at least one dedicated member of your staff will be needed over the next 3 years to coordinate the response effort. It would be highly desirable to have this staff member located in the Kennewick Office. We also anticipate that this dedicated individual will need to be supported by an additional 0.5 full-time-equivalent comprised of individuals providing specialized technical, regulatory, and public involvement expertise. We foresee that such support will also be needed

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beyond fiscal year 1996, as deactivation activities shift to other similar Hanford Site facilities. However, of immediate concern is the need to identify support over the next 4 months so that key issues in the dangerous waste and air compliance areas can be addressed.

In the dangerous waste compliance area, a key issue that requires near-term resolution is whether a revision will be needed for the PUREX Plant Part A permit application, Form 3 (Part A). At the July 13, 1993, meeting, RL proposed that such a revision is not necessary, as deactivation activities will involve only short-time usage of several PUREX tanks and ancillary equipment for dangerous waste management until the mixed waste can be removed. This equipment was previously used for processing purposes when the PUREX Plant was operational. However, as a result of the transition to deactivation and the mission change at the Hanford Site, RL has determined certain nuclear materials contained in nitric acid solutions in the plant to be waste. RL has no intention of pursuing long-term waste management activities in this equipment that, by default, is taking on a temporary dangerous waste management role. Rather than including this equipment in a revised Part A, RL proposes that deactivation compliance activities be covered by the following Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) milestones:

- Submittal of a RCRA closure plan covering the initial closure activities associated with the deactivation of equipment discussed in the current PUREX Plant Part A and PUREX Storage Tunnels Dangerous Waste Permit Application--Final closure activities will have to be planned with future decontamination and decommissioning activities. (Modify existing wording; Milestone M-20-24, July 1995)
- Submittal of a project management plan (PMP) covering Phase I deactivation activities--The PMP will address (1) removal of dangerous liquid process materials from the plant and (2) the deactivation of plant equipment, whether or not discussed in the current PUREX Plant Part A and PUREX Storage Tunnels Dangerous Waste Permit Application. (Create new milestone; Milestone M-20-XX, date to be determined)

We recommend that the current Tri-Party Agreement negotiations include a discussion of these milestones.

In the air compliance area, key issues that require near-term resolution pertain to the release of criteria pollutants and toxic air pollutants to the atmosphere as a result of Phase I activities. The issues are discussed in separate letters being prepared for transmittal to your office and the office of Ms. Ann Pontius, Chief, Air Compliance & Permits Section, EPA Region 10.

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Because of the aggressive schedule proposed by RL to complete the PUREX Plant deactivation effort, we request that feedback regarding the support and issue resolution needs outlined in this letter be provided by August 10, 1993. If you have any questions regarding this request, please contact Mr. R. N. Krekel of RL on (509) 376-4264, or Mr. R. W. Brown of Westinghouse Hanford Company on (509) 376-4026.

Sincerely,

Robert G. Holt, Acting Program Manager  
Office of Environmental Assurance,  
Permits, and Policy  
DOE Richland Operations Office

R. E. Lerch, Deputy Director  
Restoration and Remediation  
Westinghouse Hanford Company

cc: R. Bowman, WHC  
W. Brown, WHC  
A. Conklin, DOH  
D. Duncan, EPA  
G. Hofer, EPA  
D. Jansen, Ecology  
D. Kelley, WHC  
R. King, Ecology  
T. Michelena, Ecology  
R. Nye, EPA  
D. Nylander, Ecology  
R. Oldham, WHC  
A. Pontius, EPA  
F. Ruck, WHC  
D. Sherwood, EPA  
C. Sikorski, EPA  
T. Tebb, Ecology  
D. Washenfelder, WHC

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Distribution:

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J. J. Luke	WHC	H6-25
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R. C. Roal	WHC	S6-17
J. R. Robertson	WHC	H6-30
L. D. Romine	RL	R3-81
F. A. Ruck III	WHC	H6-23
J. O. Skolrud	WHC	H6-20
E. H. Smith	WHC	H6-22
S. D. Stites	RL	A5-15
G. T. Tebb	Ecology, Kennewick	
D. Washenfelder	WHC	S6-18
J. R. Williams Jr	WHC	H6-24
B. D. Williamson	WHC	B3-15

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