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Department of Energy
Richland Operations Office
P.O. Box 550
Richland, Washington 99352

NOV 21 1996

96-MSD-387

Mr. Mike Wilson, Program Manager
Nuclear Waste Program
State of Washington
Department of Ecology
P.O. Box 47600
Olympia, Washington 98504-7600

Dear Mr. Wilson:

COMPLETION OF HANFORD FEDERAL FACILITY AGREEMENT AND CONSENT ORDER (TRI-PARTY AGREEMENT) MILESTONE M-46-01C, CONCURRENCE OF ADDITIONAL TANK ACQUISITION

This letter provides notification of the completion of Tri-Party Agreement Milestone M-46-01C. Based on the attached summary report, the current planning baseline indicates that new Double-Shell Tanks (DST) for additional tank space will not need to be designed and constructed in the next six to eight years. This summary report is updated annually under Tri-Party Agreement Milestone M-46-01 which reexamines the need for new DSTs.

If you have any questions, please contact Mike Royack on (509) 376-4420 or Carolyn Haass on (509) 372-2731.

Sincerely,

for George H. Sanders, Administrator
Hanford Tri-Party Agreement

MSD:CCH

Attachment

cc w/attach:
S. Dahl, Ecology
N. Hepner, Ecology
L. Arnold, FDH
S. Marchetti, FDH
B. Erlandson, LMHC

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WASTE TANK INVENTORY

INTERFACE CONTROL WORKING GROUP

HANFORD FEDERAL FACILITY AGREEMENT AND CONSENT ORDER

MILESTONE M-46-01C

SUMMARY REPORT

WASTE TANK INVENTORY
INTERFACE CONTROL WORKING GROUP
HANFORD FEDERAL FACILITY AGREEMENT AND CONSENT ORDER
MILESTONE M-46-01C
SUMMARY REPORT

1.0 SUMMARY

On January 13, 1995, Westinghouse Hanford Company recommended to the U.S. Department of Energy (DOE), Richland Operations Office (RL) that Project W-236A, Multi-Function Waste Tank Facility (MWTF) should be phased out. One of the outcomes of this recommendation was a Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) milestone, M-46-01C, which requires that Tank Waste Remediation System (TWRS) review the need to build additional double-shell tanks on an annual basis. The basis for this review was just completed and centers around the Operational Waste Volume Projection report, WHC-SD-WM-ER-029, was issued on September 20, 1996 (Reference 1). This report reviewed the waste streams generated and determined that no new double-shell tanks will be needed in the near future based on current assumptions. Approximately six to eight years are needed to build new double-shell tanks. The Baseline projection shows that there will be enough tank space available during that timespan. This projection will reexamine the tank space needs and requirements in fiscal year (FY) 1997 as required by Tri-Party Agreement milestone M-46-00. As the retrieval, pretreatment, and immobilization programs further mature during FY 1997 and on, as well as privatization initiatives, specific needs for additional storage capacity will be further clarified. Managing the present and projected wastes within the existing double-shell tank system requires accepting increased risk, implementing several new waste management actions.

2.0 INTRODUCTION

2.1 Purpose

The purpose of this report is to provide a single document that summarizes the waste management technical studies, tank waste needs and other activities performed in support of the decision of whether or not additional new double-shell tanks are needed. Several technical studies have been completed; others are still in process. These studies and actions from the 1995 report (Reference 2) are summarized in Section 3.0.

2.2 Background

The decision to phase out the MWTF Project was made after the TWRS was asked by the RL to reassess the need for additional double-shell tank storage space due to funding limitations for FY 1996 and outyears. Current waste volume projections, risk associated with not having additional tanks and waste management alternatives were considered in this assessment. As a result of this review, the decision was made to phase out the MWTF and Tri-Party Agreement milestones M-46-00 and M-46-01 were initiated. It was determined that several waste management actions should be implemented to manage the present and projected wastes within the existing double-shell tank storage system. The Waste Tank Inventory

Interface Control Working group (ICWG) was formed in March 1995 to document a clear technical basis and to administer identified waste management actions and activities. This ICWG is comprised of representatives from several TWRS organizations whose efforts are crucial to resolving any tank inventory issues, and include an RL representative to monitor and observe progress.

2.3 Conclusions

Based on the release of the Operational Waste Volume Projection report, WHC-SD-WM-ER-029, Rev. 22 and the review of the actions in section 3.0 of this report, no new double-shell tanks are required in the next six to eight years. The key factors considered in this decision presented by the projection included, but are not limited, to the following:

- Active mixing pump mitigation of the flammable gas safety issue in tank 241-SY-101 with no passive mitigation needed for the other flammable gas watch list tanks
- Reduced waste volume generation by the Hanford Site facilities
- Improved tank space use
- Elimination of the contingency space
- Capability to manage in 200 West Area without additional new tanks
- No anticipated additional storage needs from TWRS privatization initiative
- Unlikelihood that any existing double-shell tank will leak during the next ten years
- Increased waste inventory estimates due to increased single-shell tank porosity estimates
- Decreased waste volume reduction factors for evaporator operations
- Concentration of waste to the specific gravity operating limit in all future evaporator campaigns (SpGr of 1.41 versus 1.35)
- Revised waste segregation requirements
- Tanks AP-106/-108 will be transferred full to the private contractors in FY 2000
- Dilute waste will be evaporated to double-shell slurry feed in the year it is produced

Several open action items existed from the 1995 future tank needs report (Reference 1) and their status is as follows:

3.0 FOLLOW UP ON 1995 PLAN OF ACTIONS

3.1 Consolidate Neutralized Current Acid Waste (NCAW) - Complete (Reference 3).

The purpose of this action was to recommend a management plan for the high-heat tank waste, including NCAW in 241-AY and 241-AZ Tank Farms and tank 241-C-106 waste. The initial NCAW study was issued in January 1996 and looked at numerous sludge washing/combination options (Reference 3, Rev. 0). The alternatives for consolidating high heat sludges have been reviewed by a decision board comprised of WHC management, and a RL representative. It was concluded that consolidating all the sludges into a single tank would require modifications to the tank farm safety basis. The preliminary decision reached by the decision board was not to consolidate all the high heat sludges into a single tank. The selected alternative (Alternative 8 modified) would wash the sludges in the tanks they reside in without additional consolidation of solids. Due to the 5 M Na limit, the NCAW supernates would not be combined into a single aging tank (Tank AY-101) but would be concentrated and sent to tank AY-101 and an additional non-aging tank.

3.2 Consolidate Neutralized Cladding Removal Waste (NCRW) - Complete (Reference 4)

The scope of this evaluation was to document the current planning case for NCRW and 241-SY-102 waste management. The NCRW Decision Plan recommends that the 241-SY-102 solids be transferred cross-site to tank AW-105. The solids in tanks AW-103 and AW-105 will not be consolidated at this time as earlier recommended. The study stated that from a technical standpoint, the tanks could be combined but the conservative criticality specifications would require revision. It was recommended that the tanks AW-103 and AW-105 not be consolidated to avoid making a flammable gas watch list tank.

The evaluation also recommended that double-shell slurry feed be placed on top of AW-103 or AW-105 but left the transuranic (TRU) issue on this subject open. This action is considered complete but the TRU issue will be followed in section 3.5.

3.3 Validate Waste Concentration Limit- Complete (Reference 5)

This study focused on the possibility of developing new or additional control limits intended to prevent adverse accumulations of gas within double-shell tank waste. The findings of this study indicate these limits could be stated as such: *When the non-convective solids depth multiplied by the convective waste specific gravity is maintained below a given value in any double-shell tank, episodic gas releases should not occur in the absence of waste intrusive activities.*

Solids (non-convective waste) are the only waste form that can retain gas, and the liquid specific gravity generally correlates with the viscosity of the liquid (convective waste). In this case, the higher the specific gravity of the liquid, the higher its viscosity, and the higher the flow resistance that will be experienced by a gas bubble trying to

escape the solids matrix. It appears that the specific gravity of the convective waste could be a key parameter describing why two tanks with the same total solids volume may exhibit dramatically different behavior in terms of gas release events.

3.4 Evaluate Evaporator Feed and Receiver Tanks As Spares - Complete (Reference 6)

This study was to examine the feasibility of using tanks 241-AW-102 and 241-AW-106 (242-A evaporator feed and receiver tanks) for spare space for short-term storage of a waste stream caused by an upset condition. DOE Order 5820.2A, "Radioactive Waste Management," (Reference 7) requires the reserve of spare space (one aging waste tank and one non-aging waste tank) in case of a leak in an aging waste tank.

This study found that these tanks could provide a portion of the required 2 Mgals of spare space through FY 2003. However, the available volume varies during evaporator campaigns. The first selection should be tank 241-AP-103 until FY 1999, the evaporator feed and receiver tanks are a secondary choice for waste stream storage in an emergency. This recommendation is based on the staff and administrative costs required to ready either of the tanks for waste transfer.

After FY 1999, providing that baseline case assumptions are valid, use of the feed and receiver tanks is recommended, if managed as noted for each waste type examined in the study. This action gives TWRS an approach that will maximize its space usage.

Throughout FY 1995 and until FY 2003, the use of the feed and receiver tanks as spare space will require the evaporator to be moved to shutdown status before transferring an escaped waste stream to the feed and receiver tanks. This requirement ensures an opportunity to review possible compatibility issues.

3.5 Resolve Complexed TRU Waste Issue - Ongoing
Due for completion TBD (Reference 8)

Complexed waste was generated in the 1970's from the B Plant strontium recovery process and subsequently stored in single-shell tanks in 200 West Area. Recent estimates indicate that the pumpable liquid in West Area single-shell tanks is approximately 3,600,000 gallons but may be as high as 4,400,000 gallons. Approximately 40% of this liquid waste (1,400,000) may be complexed. Tank 241-SY-102 is the only double-shell tank in 200 West Area designated as a staging tank to transfer the waste to 200 East Area. The other two tanks, 241-SY-101 and -103 are both flammable gas watch list tanks and could not readily be considered as staging tanks to transfer the waste from 200 West to 200 East Area. To reduce the amount of waste that requires most costly disposal options, complexed waste and TRU wastes have been segregated. The waste segregation was also accomplished to comply with DOE Order 5820.2A, "Radioactive Waste Management." Additionally, waste evaporation of the combined complexes and noncomplexed wastes may result in a significantly thick, viscous slurry affecting the resulting volume reduction factor and the waste volume projections.

The objectives of this waste management action are to: 1) identify the 200 West Area single-shell tanks without compatibility concerns: 2) develop additional information required to evaluate compatibility issues of complexed and/or TRU wastes within the context of the only staging tank in 200 West Area (241-SY-102); 3) identify waste management actions to resolve this issue (these actions may range from cleaning and retrieving the TRU waste in tank 241-SY-102 to simply using it as a staging tank in its present condition); and 4) develop an emergency pumping and interim stabilization plan for the 200 West Area single-shell tanks with compatibility issues.

Some of the tanks requiring interim stabilization do not possess an adequate characterization. These tanks must be sampled and analyzed on a tank-by-tank basis in accordance with the characterization program grab sampling and analysis plan, or by use of a specially developed plan if required by tanks not amenable to standard grab sampling procedures. The 200 West Area labs are currently testing the effects of placing complexant supernate on tank SY-102 sludge, doing a mixing study and a boil down test. The current status of the four actions follow.

1) Identify the 200 West Area SSTs without compatibility concerns- (this statement was intended to refer to only to TRU activity and complexant waste issues - i.e., Non-Complexed Waste with < 100 nCi/gm TRU activity). With this qualifier, the following is known:

   Non-Complexed Waste with < 100 nCi/gm TRU activity (i.e., "no compatibility concerns") : S-101, S-102, S-103, S-106, S-107, S-108, S-109, S-110, T-104, U-107, U-108, U-111 Potentially Complexed Waste with < 100 nCi/gm TRU activity: U-102, U-103, U-105, U-109 Potentially Complexed Waste with ≥ 100 nCi/gm TRU activity: U-106 Unknown or Requiring Additional Sampling and Analysis: S-111, S-112, SX-101, SX-102, SX-103, SX-104, SX-105, SX-106, T-110.

2) Develop additional information required to evaluate compatibility issues of complexed and/or TRU wastes within the context of SY-102- This will constitute sampling and analyzing the interstitial liquid of the tanks in the last category of 1) above, as well as completing the testing currently specified (and underway) for the U-Farm wastes.

3) Identify the waste management actions to resolve the issue- Actions 1 and 2 above should quantify the amount of the waste types of interest. Also available should be an estimate of the probability of the wastes mobilizing TRU activity from SY-102 solids, and whether or not the wastes exhibit complexant waste behavior, which are two different issues. The following assumes no changes are discovered in the presently suspected characterizations.

   If TRU mobilization is not identified as an issue- Since the complexant waste concern is an operational (i.e., a cost) issue and not a safety issue, TWRS management will have to make the call on which option is cheaper (to commingle waste types at SY-102 to expedite the interim stabilization schedule and deal later with the perceived loss of WVR). One possible outcome could be that complexant waste behavior is not exhibited by the wastes, in which

case the complexant waste segregation issue vanishes. Although TRU waste segregation is also an operational issue, it is specified by DOE Order 5820.2A. RL will have to make the call about how tank U-106 (and any others so identified) is handled (i.e, maintain TRU segregation or issue a waiver and commingle). If TRU mobilization is identified as an issue-Same as the above, except that now RL will have to decide how all the complexed liquids are handled, and not just U-106. It is possible that a liquid could be non-complexed yet still pose a TRU mobilization risk. Judgment of TRU mobilization risk should be the driver for considering SY-102 solids retrieval, but this is not the only option. As before, a waiver to DOE Order 5820.2A could allow routing complexed waste through SY-102 as well as mixing TRU and non-TRU liquids. This should be the outcome if it is deemed the lowest cost approach.

4) Develop an emergency pumping and interim stabilization plan for the 200 West Area SSTs with complexant/TRU compatibility issues-An update of the plan would be generated soon after identification of the lowest-cost interim stabilization option (if such an identification proves technically and politically possible). Since these compatibility issues are cost driven, pumping a leaking SST to any available DST (i.e., SY-102) would take precedence over any TRU/complexant waste concerns.

Testing of the lab samples are continuing. This action will continue open until the above questions have been answered satisfactorily and a plan for proceeding has been agreed to. This action will be again discussed in next years report.

3.6 Perform Formal Decision/Risk Analysis - Complete
(Reference 9)

This study was initiated to provide a risk-based assessment of the overall waste volume versus double-shell tank storage capacity and to develop fallback positions (Section 3.8) for projections where the waste volume was at a high risk of exceeding capacity. A working simulation model was the primary deliverable of this study. The model validates the approach and demonstrates that simulation analysis can provide a method of tracking uncertainties in available data, assessing probabilities, and serves as a tool to be used by management to determine the consequences of various off-normal occurrences.

Both a simple analytical model and a detailed simulation model were constructed to replicate the current Operational Waste Volume Projections through the year 2015. Separation of the double-shell tank waste volume into three waste streams (aging, complexed, and non-complexed) was found to be necessary in order to effectively model the current separation requirements. Three deterministic Off-Normal Condition simulations were evaluated for each of the three waste streams. Six of the nine Off-Normal Conditions required fall back positions. However, in all cases the fallback positions were sufficient to ensure that the capacity exceeded the volume for the affected waste stream.

3.7 Perform Contingency Tank Analysis - Complete
(Reference 10)

The purpose of this study was to evaluate the impact of deleting one contingency tank from the waste volume projection starting in 1999. Historically, two spare tanks were maintained to account for spare tank space in case of a leak in a double-shell tank per DOE Order 5820.2A. One contingency tank was maintained in case of an underestimate of future waste generation. The report evaluated this information and recommends that spare and contingency tank space be reduced to two DST volumes--one spare tank (per DOE Order 5820.2A) and one contingency tank. This is justified by recent corrosion data and a review of projected waste generation rates. Corrosion Engineering (Reference 11) documented that loss of a tank due to corrosion is not likely within the expected period before shutdown of the tank farms in year 2028. Jim Strode evaluated the projected waste generation rates used in the waste volume projection and found that they were sufficiently conservative and do not require the additional contingency tank.

3.8 Develop Plans for Fallback Positions - Complete
(Reference 12)

Sensitivity analyses using the previously mentioned risk-based model were performed for fall-back positions (i.e., management actions) to accommodate potential off-normal and programmatic change events overlaid on the waste volume projections and their uncertainties. These sensitivity analyses allowed determining and ranking tank system high-risk parameters and fall-back positions that will accommodate the respective impacts. This quantification of tank system impacts shows periods where tank capacity is sensitive to certain variables that must be carefully managed and/or evaluated. Identifying these sensitive variables and quantifying their impact will allow decision makers to prepare fall-back positions and focus available resources on the highest impact parameters where technical data are needed to reduce waste projection uncertainties.

For noncomplexed waste, the period of capacity vulnerability occurs during the years of single-shell tank (SST) retrieval (after approximately 2009) due to the sensitivity to several variables. Ranked by importance these variables include the pretreatment rate and 200-East SST solids transfer volume.

For complexed waste, the period of capacity vulnerability occurs during the period after approximately 2005 due to the sensitivity to several variables. Ranked by importance these variables include the pretreatment rate, 200-East SST solids transfer volume, complexed waste reduction factor using evaporation, and 200-West saltwell liquid porosity.

For aging waste using current planning assumptions there were essentially no periods of capacity vulnerability until the final few years of SST retrieval (after approximately 2016). These later capacity needs are attributed to the increasing uncertainty associated with off-normal events such as the on-line date of the high-capacity vitrification facility and the initial double-shell tank leak occurrence rate.

The selection of particular fall-back positions to alleviate vulnerable tank capacity periods requires further analyses with the following emphasis:

1) the technical bases for these sensitive variables must be established and accepted so the resultant uncertainties are validated and

2) the sensitive variables must be evaluated with various fall-back position groupings to determine alternative selections.

Based on these results, no actions were identified that require a change to the FY 1996 Multi-Year Program Plan (Reference 13). Further refinements and analyses are planned to enhance the model in analyzing upset scenarios and fall-back positions.

Programmatic and technical data needs are to validate variable ranges and associated programmatic risk for the general variable categories that affect available tank capacity space or affect timing and volumes of input waste sources.

Finally, a sensitivity analysis approach to tank waste volume versus capacity was successfully demonstrated with a full complement of variables representing potential off-normal events and programmatic changes. These variables are operational in a flexible modeling platform accommodating variable range distributions that can be probabilistically sampled automatically. Thus, this modeling platform represents a strategic planning tool using a risk-based approach that quantifies tank waste system uncertainties and will aid in future decision-making.

3.9 Upgrade Waste Volume Projection System - Complete
(Reference 1)

This activity is a three-part project. Phase I involved the migration of the existing system from the existing PDP 11 hardware and software platform to a PC-based system. This work was completed in April 1996. The second phase automated manual procedures which would improve the speed and flexibility of the system. This work was completed in September 1996. The new system was used to produce the third phase of this activity, Revision 22 of the Operational Waste Volume Projection, which was issued to RL and the Washington State Department of Ecology on September 20, 1996.

4.0 REFERENCES

1. WHC-SD-WM-ER-029, "Operational Waste Volume Projection," Revision 22, dated September 20, 1996.

2. WHC-SD-W236A-ER-021, Revision 3, "Multi-Function Waste Tank Facility Phase-Out Basis," dated October 14, 1995.

3. WHC-SD-WM-ER-532, Revision 1, "NCAW Consolidation Management Plan," dated October 4, 1996.

4. WHC-SD-WM-RPT-226, "Neutralized Cladding Removal Waste and AY-102 Waste Consolidation Decision Plan," Revision 0, dated June 17, 1996.

5. Internal memo, S. D. Estey and M.D. Guthrie to N. G. Awadalla, 74A10-96-029, "Data Analysis and Criteria Development to Prevent Accumulation of DST Waste with Unacceptable Gas Retention Behavior," dated March 29, 1996.

6. WHC-SD-WM-ES-371, Revision 0, "Use of 242-A Evaporator Feed and Receiver Tanks as Spare Space," dated January 18, 1996.

7. DOE Order 5820.2A, "Radioactive Waste Management".

8. WHC-SD-WM-TI-747, Revision 0, "TRU Activity and Complexed Waste Considerations for 200 West Area SST Interim Stabilization Planning," dated April 18, 1996.

9. WHC-SD-WM-ER-527, Revision 0, "A Risk Management Approach to Double Shell Tank Waste Volume Versus Storage Capacity," dated January 9, 1996.

10. WHC-SD-WM-ES-376, Revision 0, "Evaluation of Contingency Tank Removal", dated September 30, 1996.

11. WHC-SD-WM-ER-556, Revision 0, "DST Useful Life Analysis", dated March 29,1996.

12. WHC-SD-WM-ER-548, "Sensitivity Analysis of Potential Events Affecting the DST System and Fall-Back Actions," DRAFT, dated September 27, 1996.

13. WHC-SP-1101, Revision 1, "Tank Waste Remediation System Fiscal Year 1996 Multi-Year Program Plan," dated September 1995.

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If you have any questions, please contact Mike Royack on (509) 376-4420 or Carolyn Haass on (509) 372-2731.

Sincerely,

ORIGINAL SIGNED BY F R Mieva
for
George H. Sanders, Administrator
Hanford Tri-Party Agreement

MSD:CCH

Attachment

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S. Dahl, Ecology
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B. Erlandson, LMHC

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D. Jackson, EAP
G. Sanders, EAP

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M. Ramsay, WSD
M. Royack, WSD
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