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October 22, 1990
Final

Meeting Minutes Transmittal/Approval
Unit Managers Meeting: 305-B
420 Golf Club Road
Lacey, Washington

Meeting Held August 15, 1990

305-B, Unit Managers' Approval

Daniel L. Duncan, EPA Region X, Unit Manager Date: _____

Clifford E. Clark
Clifford E. Clark, DOE-RL, ERD Date: 10/23/90

Glenn Thornton
Glenn Thornton, PNL, Contractor Representative Date: 10/23/90

Megan Lerchen
Megan Lerchen, Ecology Unit Manager Date: 10/23/90

PURPOSE: Monthly status report.

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

- Attachment #1 - Meeting Summary of Discussion and Commitments
- Attachment #2 - Commitments/Agreements Status List
- Attachment #3 - Agenda for the meeting
- Attachment #4 - Attendance List



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Distribution:

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M.J. Anthony	DOE	(A6-95)
J.D. Bauer	WHC	(B3-15)
W.J. Bjorklund	PNL	(P7-68)
L.E. Borneman	WHC	(B2-19)
E.A. Bracken	DOE	(A6-95)
L.C. Brown	WHC	(H4-51)
R.C. Bowman	WHC	(H4-57)
R.M. Carosino	DOE	(A4-52)
C.E. Clark	DOE	(A6-95)
S.B. Clifford	WHC	(H4-57)
C. Defigh-Price	WHC	(B2-20)
D. Duncan	EPA	
K.R. Fecht	WHC	(H4-56)
C.J. Geier	WHC	(H4-57)
J.D. Goodenough	DOE	(A6-95)
T.M. Hennig	DOE	(A6-80)
R.D. Izatt	DOE	(A6-95)
G.W. Jackson	WHC	(R2-29)
J. King	SWEC	(A4-35)
R.J. Landon	WHC	(B2-19)
R.E. Lerch	WHC	(B2-35)
M. Lerchen	Ecology	
T. Michelena	Ecology	
M.A. Mihalic	WHC	(R1-15)
H.E. McGuire	WHC	(B2-35)
E.W. Powers	WHC	(R2-77)
L.L. Powers	WHC	(B2-35)
S.M. Price	WHC	(H4-57)
R.D. Pierce	WHC	(R2-80)
M.R. Romsos	WHC	(R2-82)
F.A. Ruck III	WHC	(H4-57)
G.T. Thornton	PNL	(P7-68)
H.T. Tilden	PNL	(P7-68)
D.E. Trader	DOE	(A5-90)
S.A. Wiegman	WHC	(B2-19)
J. Witezack	Ecology	

ADMINISTRATIVE RECORD (305-B) [Care of Susan Wray, WHC (H4-51C)]

Attachment #1

Meeting Summary of Discussion and Commitments

1. Follow Up Items From The Previous Meeting

a. Secondary Containment

A discussion ensued on secondary containment. Ecology commented that the use of overpacks as secondary containment would not satisfy the requirement. The primary containers need to be visually inspected for leakage and the overpacks do not allow this to occur. The use of drip pans would allow for inspection. The requirements for secondary containment do not apply to solids. DOE stated that they would propose to use overpacks for secondary containment for those classes of material that the facility would receive infrequently and in small quantities. If inspection is the main problem then the tops could be left off and the drums could be specially labeled. The requirement for building modifications to supply secondary containment would be very expensive and may not be warranted. PNL commented that the material would consist of flammable radioactive mixed waste (FRMW) which would be stored in the area adjacent to the high bay area. The amounts of FRMW are small and to date (inclusive of historic volumes stored) have amounted to 5 barrels. Ecology commented that this storage area is an area of concern. The cost of other secondary containment outside of overpacks is small compared to the cost of a clean up, especially for a long term facility. The discussion continued on the use of other strategies for containment. Ecology reiterated the need to supply secondary containment exclusive of the use of overpacks.

b. Proposed Modification To Former "Research Facility", NOD #15

PNL stated that the former research facility is currently not operating. There is no water currently flowing in the trench in which the only area floor drain is located. They would prefer not to plug the drain with concrete since this would reduce potential future use of this area. They propose to connect a vertical riser to the drain and place a cap on the top. A discussion ensued as to the design of the riser. Ecology commented that the riser would have to be appropriately painted and the cap would have to be sufficiently attached to preclude it from being open. If the cap can be removed with ease then the drain will have to be addressed in the facility closure plan. DOE/PNL proposed that the cap be locked or welded on to the pipe. Welding would prevent the removal of the cap outside of cutting the pipe. Ecology concurred that the use of a riser and a welded or locking cap ~~would~~ ^{may} exclude the drain from being addressed in the closure plan.

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2.

Interface Between 305-B and Sitewide Part B Permit.

PNL commented that currently the unit permit application is written as a stand alone document and inquired if the majority of the boiler plate could be deleted from 305-B and be added to the site wide permit. A discussion ensued on the merits of having redundancy in the unit specific application and the site wide facility permit. Ecology commented that it helps to have some overlap so that the reader of the unit specific section of the facility permit does not have to keep referring to other portions, or other documents.

a. Building Emergency Plan/Contingency Plan

DOE commented that the outline suggests two plans and they would like to see one document to which Ecology concurred that one document could cover both plans. DOE stated that the site wide emergency plan had been sent to Ecology. He further explained the hierarchy of the site wide emergency plan and the supportive documents. The emergency plan is used to cover different types of emergencies at the site from natural disasters to criticality emergencies and would be inclusive of spills, etc. Underlying and supporting this plan are the individual contractor's plans. Underlying and supporting these are the building specific plans which cover specific buildings. In this case this would cover what to do at the 616 building. Ecology commented that they would need to review all of the documents referred to the building specific emergency plans inclusive of the large scale plans and these would be part of the permit. DOE described the ~~EXACT~~ system and its uses and voiced a concern with adding the site wide plan which covers emergencies other than those associated with hazardous waste into the permit. Their concern is that it then would require them to do a permit modification every time the plan needed to be change, even on parts not related to hazardous waste. Ecology commented that sections specifically related to and applicable to the unit's operation could be adopted by reference into the permit. This would allow the other section of the site wide emergency plan to be modified without having to do a permit modification. DOE commented that the agencies do not have copies of WHC and PNL's contractor's emergency plans. Ecology requested copies of these plans so that they could review how the plans interface between each other. A discussion ensued on the difficulty of reading and trying to follow the plans.

Action Item #1: Send a copy of WHC & PNL's Emergency Plans to Ecology by August 16, 1990. Action Sue Price

WHC commented that chapter 7 of the 616 permit application was an attempt to give an integrated overview of the various levels of emergency plans.

b. Training Plan

Ecology commented that 616 will need a copy of the training plan specific to its unit, also. A discussion ensued on the

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requirements for a training plan in the permit. DOE stated that the general training plan issues which pertain to all of the units will be included in the site wide Hanford RCRA Federal Facility Permit. This will include such issues as training for all employees related to dangerous wastes. Unit specific training plans will be included in the unit specific portion of the permit.

c. Waste Management Plan

PNL stated that this plan is not very far along in its development. It currently will contain redundancy with partial duplication of information contained in the site wide permit. In addition, this is a PNL specific plan and it is taking time to develop.

3. Submittal Dates and Formats

a. Use of "approval draft" notation

A discussion ensued on the stamping of the NOD response table with "approval draft". PNL indicated that a mistake had been made on stamping the document. A copy of the response table was resubmitted without the stamp. This problem has been corrected and hopefully will not occur again. Ecology indicated this should not have any effect on the turnaround time for ~~these~~ responses.

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b. Tri-Party Agreement issues

PNL indicated that a milestone had been missed, they gave some background on the issue, and inquired if this is an issue and can we resolve it. Ecology commented that it appears that PNL has done everything they could do and that they will hold back on comment. They indicated that DOE/PNL should continue moving forward.

4. Ecology Comments on 305-B NOD Response Table

Ecology indicated that they have not finished the review of the comments and will defer this discussion to the next Unit Managers Meeting.

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Attachment #2

ACTION ITEM

COMMITMENTS/AGREEMENTS STATUS LIST

8-15-90:1 Send a copy of WHC & PNL's Emergency Plans to Ecology by August 16, 1990. Action Sue Price

NEW

7-9-90:2 DOE/WHC will send the NOD responses to Ecology by July 25. Action DOE/WHC.

CLOSED: Transmittal of the NOD response Table.

Agreement: The next UMM will be in Lacey Washington on September 20, 1990 in Richland Washington.

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Attachment #3

305-B Part B Permit Application Agenda
Unit Managers Meeting
August 15, 1990
420 Golf Club Road
Lacey, Washington

1. Follow up Items From Previous Meeting
 - a. Secondary containment (drip pans & overpacks)
 - b. Proposed modifications to former "research facility" shown in NOD

2. Interface Between 305-B and Sitewide Part B
 - a. Building Emergency Plan/Contingency Plan
 - b. Training Plan
 - c. Waste Management Plan

3. Submittal Dates and Formats
 - a. Use of "approval drafts" notation
 - b. Tri-Party Agreement issues

4. Ecology Comments on 305-B NOD Response Table

5. Discussion

6. Set Next Meeting Date

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Attachment #4

Attendance List

<u>Name</u>	<u>Organization</u>	<u>Phone</u> __
Roger Bowman	WHC	509-376-4876
Cliff Clark	DOE/ERD	509-376-9333
Mike Gasser	SWEC	509-376-9830
Teresa Hennig	DOE	509-376-6888
Megan Lerchen	Ecology	206-438-3089
Cathy Louie	SWEC	509-376-9830
Toby Michelena	Ecology	206-438-7016
Richard Pierce	WHC	509-373-4846
Sue Price	WHC	509-376-1653
Michael Romsos	WHC	509-373-4032
Glenn Thornton	PNL	509-376-7688
Harold Tilden	PNL	509-376-0499

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