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01-WMD-042

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RECOVERY PLAN FOR MEETING HANFORD FEDERAL FACILITY AGREEMENT AND  
CONSENT ORDER (TRI-PARTY AGREEMENT) MILESTONE M-91-12

This letter, is in reference to a letter, to M. A. Wilson, Ecology, from C. E. Clark, RL, "Notification of Potential to Miss Completion of Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) Milestone M-91-12 Initiate Thermal Treatment of Mixed Waste" 01-RCA-086, dated December 14, 2000.

As stated in the referenced letter, Tri-Party Agreement Milestone M-91-12, "Initiate Thermal Treatment of Mixed Wastes," has a completion date of December 31, 2000. The primary source for sustained thermal treatment capability for the U.S. Department of Energy, Richland Operations Office (RL) is the thermal treatment contract with the Allied Technology Group, Inc. (ATG) as managed by RL's contractor, Fluor Hanford, Inc. (FHI). The completion of this milestone was based on ATG's ability to start thermal treatment by December 31, 2000, however, ATG has experienced technical difficulties with the start-up of their thermal treatment unit and will be unable to achieve a sustainable thermal treatment capability on the scheduled date. FHI and ATG have commenced with recovery actions and anticipate that sustainable thermal treatment capability will be online by April 30, 2001, contingent upon the outcome of the scheduled activities.

As noted in the referenced letter, ATG and FHI have been aggressively pursuing the completion of this milestone since the award of the contract to ATG in November of 1995. The latest attempt at certification demonstrations was commenced on December 16, 2000, and terminated on December 17, 2000, with the concurrence of the regulatory authorities witnessing the test activities. Cessation of testing was due to further technical difficulties, and not due to major system, or component failures.

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Based on this latest development, RL will proceed with corrective actions as administered by FHI and ATG to ensure that a sustainable thermal treatment capability is obtained and that ATG's treatment system has had adequate "shakedown" runs to validate this desired end point. Therefore, upon regulatory agency approval, FHI and ATG intend to proceed with additional "shakedown" tests of the GASVIT® unit utilizing actual mixed low-level waste from the Hanford Site. This will provide an opportunity for ATG to operate the treatment unit in a more integrated fashion.

RL is continuing to monitor and assist FHI and ATG in obtaining a sustained thermal treatment capability. Further, RL feels that the "shakedown" period afforded by the regulatory authorities and permit are necessary and advantageous in achieving the overall objective of thermally treating a minimum of 600 cubic meters of mixed low-level waste by December 2005.

For the above reasons, RL believes the best approach at this time is to pursue the following recovery activity actions for Tri-Party Agreement Milestone M-91-12, in concert with FHI and ATG:

- ATG to begin utilizing Hanford's waste during "shakedown" testing of the GASVIT® unit (December 29, 2000), pending formal approval by regulatory authorities.
- ATG to reinitiate the first of two 8-hour GASVIT® unit test runs (February 17, 2001), contingent on successful "shakedown" operation.
- ATG to begin the GASVIT® demonstration tests (March 5, 2001), pending successful completion of the 8-hour GASVIT® test runs.
- ATG begin normal operations in accordance with their permit (April 1, 2001), pending successful demo test activities.

These recovery actions were developed with FHI and ATG, and were based, in part, on recommendations provided to ATG by the State of Washington Department of Ecology (Ecology) and the U.S. Environmental Protection Agency (EPA) during the latest demonstration testing of the GASVIT® unit. Ecology and the EPA were informed at the December 19, 2000, Interagency Management Integration Team meeting of the latest development for thermal treatment and that a recovery plan would be forthcoming.

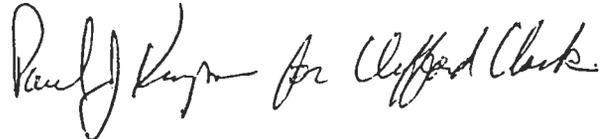
RL recommends regularly scheduled interfaces/briefings be established with Ecology and the EPA during the recovery period to provide status and information on the recovery actions. RL and our contractors will continue to work in good faith with all agencies involved to meet the Tri-Party Agreement milestone objectives under this recovery plan.

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If you have questions, please contact me, or your staff may contact Ellen Dagan, Regulatory Compliance and Analysis Division, on (509) 376-3811.

Sincerely,



Clifford E. Clark, Acting Program Manager  
Office of Regulatory Liaison

WMD:SKM

cc: J. H. Richards, CTUIR  
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