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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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August 1, 2016

16-NWP-135

Mr. Ray J. Corey, Assistant Manager for River and Plateau
Richland Operations Office
United States Department of Energy
PO Box 550, MSIN: A5-11
Richland, Washington 99352

Re: Department of Ecology's (Ecology) Comments on the *M-091 Transuranic Mixed/Mixed Low-Level Waste Project Management Plan*, HNF-19169, Revision 17, June 2016

Reference: Letter 16-AMRP-0202, dated June 22, 2016, "*M-091 Transuranic Mixed/Mixed Low-Level Waste Project Management Plan*, HNF-19169, Revision 17"

1238995

Dear Mr. Corey:

Ecology received the referenced document on June 28, 2016.

Ecology finds that the document does not meet the requirements set forth under with the *Tri-Party Agreement* Action Plan, Section 11.5 (pages 11-3 and 11-4) and is therefore incomplete.

Enclosed are Ecology's comments. We look forward to working with the United States Department of Energy to resolve all of our concerns in this document prior to finalization.

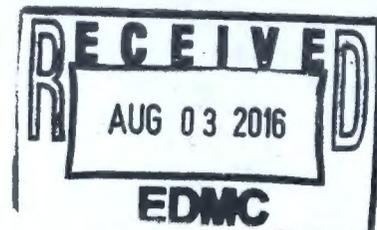
If you have any questions, please contact me at elis.eberlein@ecy.wa.gov or (509) 372-7906.

Sincerely,

P. Elis Eberlein
Waste Management Section Acting Project Manager
Nuclear Waste Program

js
Enclosure

cc: See page 2



Mr. Ray J. Corey
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cc electronic w/enc:

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Don Flyckt, CHPRC
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NWP Central File

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NWP Reader File

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Document Number(s)/Title(s) M-091 Transuranic Mixed/ Mixed Low-Level Waste Project Management Plan, HNF-19169, Revision 17.	Program/Project/Building Number: NWP/ Waste Management	Reviewer Name: Elis Eberlein, Ed Soto, Steve Lowe, Nancy Ware, John Price	Organization/Group: Waste Management	Location/Phone: Richland/372-7906
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Item	Page # Section #	Comment <small>(Provide technical justification for the comment and detailed recommendation of the action required to correct/resolve the discrepancy/ problem indicated.)</small>	Disposition <small>(Provide justification if NOT accepted.)</small>	Status
1.	General	PFNW is an essential component of DOE's Site Treatment Plan. We appreciate DOE's recognition of the need to send more waste to PFWW to maintain this capability. This is absolutely essential for M-091. M-091-44C and -44D may have to be changed to give credit into the future for shipment of more than 280 m ³ of waste for treatment at PFWW.		
2.	p. 1-2, Section 1.2 (EE)	The scope of the M-091 PMP needs to be expanded to include management of CH-TRU, RH-TRU and LLW wastes from retrieval and remediation operations including "newly generated" waste. Significant quantities of TRU and LLW waste already exist in aboveground storage and more will be generated from retrieval and CERCLA actions mentioned in this section and in Chapter 7. The TRU and LLW waste will impact the availability of Hanford facilities and infrastructure. Management of TRU, TRUM, and LLW waste must be integrated in the M-091 PMP for a complete understanding of the scope, cost, and schedule for waste disposition. Ecology doesn't regulate the LLW and TRU waste, so the information can be included for information only with no associated milestones.		
3.	p. 1-4/5 Section 1.3 (ES)	Chapter bullets: chapter 3 and 4 are switched, chapter 3 addresses retrieval of RSW, chapter 4 addresses certification of TRUM and treatment of MLLW. Chapter 8 bullet should mention the funding aspect of this chapter.		

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4.	p. 1-5, Table 1-1, M-091-051 (Comp)	Does the engineering alternatives study for acquisition of capabilities, etc.... include the increase in allowed curie limits at PermaFix? Or will application for that increase proceed on a schedule other than M-091-51? The concern is that it is a two-year process to apply and get the application approved. It seems very likely that this will be a chosen path. Why not submit the application now, and be ready for containers with higher limits in two years?		
5.	p. 1-6, Section 1.2 (EE)	The list of future CERCLA OUs include "200-SW-2 Radioactive Landfills and Dumps Group OU". In the 200-SW-2 project we only discuss it as the "200-SW-2 Radioactive Landfills Group OU". This is also what the TPA's administrative record calls the OU. Update text.		
6.	p. 1-7, Summary table (Comp)	It is unclear where the repack volumes in the first section of the table are derived from. The total volume figures do not match other reports received from RL. In what units are these volumes of waste currently being stored, and how much volume per unit?.		
7.	p. 2-1 Bullet #2 (ES)	Last sentence: "container" should read "containers".		
8.	p.4-1, Section 4.1 (Comp)	Ecology supports submitting the application for PermaFix to increase the radiological limits now.		
9.	p. 4-4, Section 4.2 (Comp)	Lists PFNW, M&EC TN, and PF DSSI TN as the only facilities under contract. Have all commercial options been given consideration? For example, do Energy Solutions or Waste Control Specialists provide options for treatment or disposal of MLLW?		
10.	p. 4-4 Section 4.2.1 (ES)	Last sentence: "with in" should read "within".		
11.	p. 4-5 Section 4.2.4 (ES)	Section 4.2.4 references the transportation of CH-MLLW and RH-MLLW "Onsite and offsite transportation of waste is discussed in Section B1.8". B1.8 is a reference to TRU waste shipments. Update text.		

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12.	p. 5-1, Section 5 (Comp)	Is this information accurate? Can AMWTP still receive transuranic waste from outside of Idaho? (1995 Idaho Settlement Agreement between Idaho, Navy, and DOE to remove the waste from Idaho.) If AMWTP can accept Hanford TRUM, can the schedule be adjusted to include this? If AMWTP is not an option, the discussion should be deleted from the M-091 Project Management Plan.		
13.	p. 5-2, Figure 5-1 (EE)	<p>(Multiple instances) Text provides volume projections for shipping TRUM waste to WIPP.</p> <p>Up to 10 shipments per week to WIPP are planned. Historically the maximum number of shipments from WRAP has been 2-3. Please include discussion of the infrastructure needed to support the higher rate such as:</p> <ul style="list-style-type: none"> • Characterization and NDE/NDA capabilities. • Waste certification. • Number of TRUPACT II and RH-72B shipping containers and trucks. • Loading facilities and support services (e.g., helium leak-testing of shipping containers, payload assembly and inventory management). • Receipt and processing of CH and RH shipping containers at WIPP and return to Hanford. • Supporting documentation for WIPP shipments. 		
14.	p. 6-1, Table 6-1 (Comp)	Table 6-1 includes LLBG, with a permitted storage capacity of 10,000 m ³ as an option for storage of containers managed under the M-091 milestone series. Storage of the containers managed under the M-091 milestone series cannot be accomplished in the Trench 31 and 34 landfills. There is an EPA prohibition on placing any MW containers in the landfill unless they meet LDR standards. LLBG is not currently authorized for storage in the proposed storage and treatment dangerous waste management units. The LLBG storage capacity should be deleted from this section as there is no potential capacity for storage at this time.		
15.	p.6-2, Section 6.1 (Comp)	Building 2401-W is listed as having storage capacity. This building is currently undergoing RCRA closure. Delete from document.		

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16.	p. 6-2, Section 6.1 (Comp)	This section refers to CWC storage outside of the storage buildings and outside storage areas. There is currently no authorization for storage of DW or MW in these areas. Delete from document.		
17.	p. 6-2, Section 6.1 (Comp)	This section refers to CWC storage of liquid wastes in outside storage areas. There is currently no authorization for storage of liquid DW or MW in outside storage areas and may not be in the future. Delete from document.		
18.	p. 6-2, Section 6.2 (Comp)	This section refers to T Plant storage outside of the storage buildings and outside storage areas. There is currently no authorization for storage of DW or MW in these areas. Delete from document.		
19.	p. 6-2, Section 6.2 (Comp)	This section refers to T Plant storage of liquid wastes in outside storage areas. There is currently no authorization for storage of liquid DW or MW in outside storage areas and may not be in the future. Delete from document.		
20.	p. 6-2, Section 6.2 (SL)	Storage of the K Basins sludge in the T Plant canyon needs to be described as that will significantly affect operations.		
21.	p. 6-2, Section 6.3 (Comp)	This section refers to WRAP storage outside of the storage buildings and outside storage areas. There is currently no authorization for storage of DW or MW in these areas. Delete from document.		
22.	p. 6-2, Section 6.4 (Comp)	This section states that storage can be provided in the LLBGs (MWTs). See comment #14 above. Delete from document.		
23.	p. 7-1, Section 7 (EE)	The first paragraph in this section mentions that remedial work under the M-016-00 milestone will be completed by 2024. Is this just a misspelling or is it based on outdated information? The milestone now says the work needs to be finished by 2042. Update text.		
24.	p. 7-3, Section 7.1.1, 1 st paragraph, 3 rd sentence. (Comp)	Change to read, "debris will be removed,"		

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25.	p. 7-3, Section 7.1.2 (SL)	Text says per the ROD for the K Basin sludge that the sludge will be treated, packaged for disposal, and interim stored pending shipment to disposal. The text later says the sludge will be placed in casks and transferred to T Plant for interim storage until a new treatment and packaging facility is available. Responsibility for performing treatment and repackaging of the sludge, and whether this occurs before or after interim storage is not clear.		
26.	p. 7-4, Section 7.1.4 (SL)	Discussion of the D-10 tank from U Plant needs to be expanded and address that absorbent was added and the RH-TRUM waste has a D001 oxidizer waste code due to high concentrations of nitrate. Treatment and repackaging of this waste for shipment to WIPP will be complex and subject to a 2024 deadline per the ROD. This time frame is not in agreement with the schedules in this report. Please explain.		
27.	p. 7-6 Section 7.2 (ES)	Second sentence states in regards to WIPP, "it is too soon to speculate on when receipt operations will recommence" then speculates, "It is projected that shipments of CERCLA TRU and TRUM waste to WIPP will not begin until after FY 2030".		
28.	p.7-6, Figure 7-2 (EE)	In previous PMPs (i.e. Rev 14, 15 and 16) there was a Figure 7-2 that included shipping projections for both TRU and TRUM waste. This was a great figure as it gave a more complete picture of the total waste management. This figure was deleted in this version. As Section 7.2 describes, CERCLA waste will be shipped beyond FY2030, so this figure can describe this situation as long as the waste defined in M-091-48 is shipped by FY2030.		
29.	p.8-1, Section 8.1 (EE)	Under WBS 013-05 TRU Retrieval it mentions retrieval under M-091-49 from LLBGs (218-W-3A, -218-W-4C, 218-W-4B, and 218-E-12B). Landfill 218-W-4C can be deleted from this list as it no longer contain waste to retrieve. This is correctly mentioned in Section 3.		
30.	p. B-iii, Appendix B (EE)	This appendix is messed up. Sections describing RCRA and NEPA are repeated twice. The table of contents also does not reflect the order of the sections.		
31.	p. C-1, Section C1 (EE)	The section mentions the CERCLA OUs called "200-SW-2 Radioactive Landfills and Dumps Group OU". In the 200-SW-2 project we only discuss it as the "200-SW-2 Radioactive Landfills Group OU". This is also what the TPA's administrative record calls the OU. Update text.		

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32.	p. C-1, Section C1.2 (EE)	This section contains several errors in the second paragraph to update. The 218-W-4C landfill does no longer contain any RSW as determined by actions documented in the M-091 PMM meetings and the 200-SW-2 project meetings. Figure C-3 also shows this correctly. Thus, the first sentence needs to say "In the 218-W-4C LLBG, Trenches T01, T04, T07, T20, T24, and T29 contained RSW". The last sentence needs to say "All RSW has been removed from this LLBG".		
33.	p. C-5, Section C1.3 (EE)	Update the first paragraph to reflect the current situation as it is also correctly shown in Figure C-4. The last sentence should read "The RSW is/was located in 14 trenches:...." Add a new sentence at the end: "All the waste in trench T17 has been retrieved".		
34.	p. C-5, Section C1.4 (EE)	Update the first paragraph to reflect the current situation as it is also correctly shown in Figure C-4. The last sentence should read:"The RSW is/was located in two trenches: T17 and T27." Add a new sentence at the end of the paragraph: "All the waste in trench T27 has been retrieved".		
35.	Table E-1 (EE)	In this entire table under "Schedule" it mentions that remedial work under the M-016-00 milestone will be completed by 2024. Is this just a misspelling or is it based on outdated information? The milestone now says the work needs to be finished by 2042. Update text.		
36.	Table E-1 (EE)	Most Milestonedates shown in the table under "Schedule" have now been renegotiated. Please update all the dates so that they align with the current milestones.		
37.	Table E-1, under 200- SW-2 (EE)	The description mentions M-091-40 and -41 as the retrieval milestones. That has now been changed and M-091-49 is the new retrieval milestone. Update text.		