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

0071304

06-AMCP-0312

SEP 29 2006

Mr. Nicholas Ceto, Program Manager
Office of Environmental Cleanup
Hanford Project Office
U.S. Environmental Protection Agency
309 Bradley Boulevard, Suite 115
Richland, Washington 99352

Dear Mr. Ceto:

COMPLETION OF THE HANFORD FEDERAL FACILITY AGREEMENT AND CONSENT ORDER, (TRI-PARTY AGREEMENT) MILESTONE M-16-93, SUBMITTAL OF IMPLEMENTATION WORK PLAN DUE SEPTEMBER 30, 2006

The purpose of this letter is to transmit the subject implementation work plan due September 30, 2006, for the acquisition of capabilities necessary to prepare transuranic waste generated by Comprehensive Environmental Response, Compensation, and Liability Act cleanup actions for disposal processing of remote handled and large container mixed low level and transuranic wastes. If you have any questions, please contact me, or your staff may contact, Matt McCormick, Assistant Manager for the Central Plateau, on (509) 373-9971.

Sincerely,

Keith A. Klein
Manager

AMCP:MSC

Attachment

cc w/attach:
G. Bohnee, NPT
S. Harris, CTUIR
J. Hedges, Ecology
R. Jim, YN
T. M. Martin, HAB
K. Niles, ODOE
D. Singleton, Ecology
Administrative Record
Environmental Portal

cc w/o attach:
R. D. Morrison, FHI
R. E. Piippo, FHI

M-16-93 IMPLEMENTATION WORK PLAN

Introduction

This Work Plan discusses acquisition of capabilities for processing transuranic (TRU) waste generated under Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) cleanup actions that will be authorized in Records of Decision (RODs) and Action Memoranda. Though most CERCLA decisions have not been made, it is still possible to address integrated approaches for providing capabilities developed pursuant to the M-91 milestones for TRU waste where such capabilities also can be used for processing TRU waste generated as a result of CERCLA actions.

M-16-93 Milestone

Submit an implementation work plan to EPA for the acquisition of capabilities necessary to prepare TRU and TRUM waste generated by CERCLA cleanup actions at the Hanford site for disposal at the Waste Isolation Pilot Plant (WIPP). This work plan will reflect retrieval decisions, projected waste volumes, and schedules from all CERCLA cleanup actions authorized in records of decision and action memoranda at the Hanford site, and will provide for updates and revisions as new information becomes available (at a minimum, the work plan must be revised in 2009 [after all 200 Area RODs are issued] and in 2012). As part of the approval process, EPA will consult with Ecology to ensure that wastes from CERCLA operable units for which Ecology is the lead regulatory agency are properly planned for. This work plan will provide a schedule for acquiring the capabilities for TRU and TRUM management necessary to support all CERCLA cleanup actions.

In order to avoid duplicative requirements, the M-16-93 work plan will integrate plans developed pursuant to the M-91 milestones to provide capabilities for RCRA mixed and suspect mixed transuranic waste where such capabilities also can be used for CERCLA TRU/TRUM waste. The work plan will be submitted pursuant to Section 11.6 of the Tri-Party Agreement.

Currently Projected Volume of Transuranic Waste Generated as a Result of CERCLA Actions

An estimated 10,200 m^3 of contact-handled (CH) TRU waste may be generated as a result of remediation of the 618-10 and 618-11 Burial Grounds. An estimated 102 m^3 of remote-handled (RH) TRU waste may be generated as a result of the same cleanup action. Remediation of 221-U will likely generate some small, but as yet undetermined, quantity of TRU waste. In addition, some 4000 m^3 of TRU waste may be generated as part of the cleanup of the Plutonium Finishing Plant (PFP). The PFP TRU waste is being packaged at the facility consistent with Waste Isolation Pilot Plant (WIPP) Waste Acceptance Criteria (WAC).

Based on decisions yet to be made, remediation of other CERCLA sites may result in the generation of additional TRU waste. The sites include:

- Liquid waste disposal sites including cribs, trenches, reverse wells, ditches, ponds, unplanned release sites and settling tanks
- Solid waste burial grounds
- Canyon facilities and associated tunnels

New T Plant Capabilities

Consistent with the M-91 milestone series, new capabilities will be added to T Plant to process approximately 7,400 m^3 of TRU waste, an estimated 1,400 m^3 of which would be remote-handled. These estimates include the RH TRU waste from the remediation of the 618-10 and 618-11 Burial Grounds. TRU waste will be processed (e.g., size reduced, prohibited items removed) to meet WIPP WAC. The waste will then be assayed to verify that it is TRU waste. The new T Plant capabilities are planned to be completed by June 2016. T Plant will have a minimum processing capacity of 600 m^3 of TRU waste per year.

Integrated Approach for Waste Processing Capabilities

Contact-handled TRU waste generated as a result of remediation of the 618-10 and 618-11 Burial Grounds will be packaged in the field such that the WIPP WAC are met. Planning for the RH TRU waste generated as a result of remediation of the 618-10 and 618-11 Burial Grounds is ongoing and a final determination on how and where the waste will be treated and packaged has yet to be made. However, this waste is included in the 7,400 m^3 of TRU waste mentioned in Section 3.0. A determination has yet to be made on the pathway for disposition of TRU waste generated as a result of 221-U cleanup activities although it is likely that the RH TRU waste volume would be processed at T Plant.

When additional 200 Area CERCLA cleanup actions result in the generation of TRU waste, the following waste processing strategy would apply:

- Liquid waste disposal sites – TRU waste generated as a result of remediation of these sites should be contact-handled and could be directly packaged without further processing to meet the WIPP WAC. Technologies and techniques developed for the retrieval of the retrievably stored waste from the Low Level Burial Grounds (LLBGs), the open air demolitions of 233-S and 232-Z, and the remediation of the 618-10 and 618-11 Burial Grounds could be applied to retrieval of waste from these sites. Technologies associated with the new processing capabilities at T Plant could also be deployed in the field to support retrieval. Technologies and techniques similar to those used for the retrieval of retrievably stored waste from the LLBGs could be used in the field to meet requirements

for visual examination/non-destructive examination, non-destructive assay, and head-space gas sampling.

- Solid waste disposal sites – TRU waste generated as a result of remediation of these sites could be contact-handled or remote-handled and would likely require processing including size reduction and removal of prohibited items to meet the WIPP WAC. Technologies developed for the retrieval of the retrievably stored waste from the LLBGs, the open air demolitions of 233-S and 232-Z, and the remediation of the 618-10 and 618-11 Burial Grounds could be applied to retrieval from these sites. Technologies associated with the new processing capabilities at T Plant could also be deployed in the field to support retrieval. Technologies similar to those used for the retrieval of retrievably stored waste from the LLBGs and developed as part of the new processing capabilities at T Plant could be used in the field to meet requirements for visual examination/non-destructive examination, non-destructive assay, and head-space gas sampling. In specific instances, largely dependent on the ability to meet onsite packaging and transportation requirements without processing, it might be more practical to process TRU waste generated from the remediation of solid waste burial grounds at the upgraded T Plant.

- Canyon facilities and associated tunnels – TRU waste generated as a result of remediation of these sites could be contact-handled or remote-handled and would likely require processing including size reduction and removal of prohibited items to meet the WIPP WAC. Technologies developed for the retrieval of the retrievably stored waste from the LLBGs, the open air demolitions of 233-S and 232-Z, and the remediation of the 618-10 and 618-11 Burial Grounds could be applied to retrieval from these sites. Technologies associated with the new processing capabilities at T Plant could also be deployed in the field to support retrieval. Technologies similar to those used for the retrieval of retrievably stored waste from the LLBGs and developed as part of the new processing capabilities at T Plant could be used in the field to meet requirements for visual examination/non-destructive examination, non-destructive assay, and head-space gas sampling. In specific instances, largely dependent on the ability to meet onsite packaging and transportation requirements without processing, it might be more practical to process TRU waste generated from the remediation of canyon facilities and associated tunnels at the upgraded T Plant.

Schedule and Critical Path Analysis

As new information becomes available, either during the feasibility study phase or after issuance of all 200 Area cleanup actions authorized in Records of Decision (ROD) and Action Memoranda, project schedules will be established or updated for acquisition of necessary capabilities to process TRU waste generated as a result of CERCLA remediation activities.

The M-15 milestone series establishes dates for completing the remedial investigation/feasibility study (or the Resource Conservation and Recovery Act facility investigation/corrective measures

study) for all operable units. The Engineering Study associated with the M-91-05-T01 target date contains the schedule for obtaining the new capabilities at T Plant.

Change Management

This work plan will be revised after issuance of all 200 Area cleanup actions authorized in Records of Decision (ROD) and Action Memoranda and as new information becomes available.

Task# DOE-AMCP-C-2006-0312

E-STARS™ Report
Task Detail Report
09/29/2006 1112

TASK INFORMATION			
Task#	DOE-AMCP-C-2006-0312		
Subject	"D U E 9 / 3 0 / 0 6" (TRI-PARTY AGREEMENT) MILESTONE M-16-93, SUBMITTAL OF IMPLEMENTATION WORK PLAN DUE SEPTEMBER 30, 2006		
Parent Task#		**Status**	Open
Reference	Collins/Ceto/Klein	**Due**	09/29/2006
Originator	McKibban, Nancy	**Priority**	High
Originator Phone	(509) 376-1366	**Category**	None
Origination Date	09/27/2006 1655	**Generic1**	
Remote Task#		**Generic2**	
Deliverable	None	**Generic3**	
Class	Long Term	**View Permissions**	Normal
Instructions	bcc: AMCP OFF File AMCP Rdg File MS Collins, AMCP MS French, AMCP JA Frey, PPRI KM Hintzen, AMCP DE Jackson, SED NJ McKibban, AMCP GL Sinton, AMCP BD Williamson, OCC RECORD NOTE: This letter transmits the implementation work plan due to EPA by September 30, 2006, for the acquisition of capabilities necessary to prepare transuranic waste generated by Comprehensive Environmental Response, Compensation, and Liability Act cleanup actions for disposal. This M-16-93 Work Plan was previously reviewed by RL-0013 and RL-0040 IPT memebers within AMCP. Comments have been incorporated. Mark French's comments were incorporated. Attachment Title Changed per OCC		

ROUTING LISTS		
1	Collins	Active
	• Collins, Michael S - Approve - Approved with comments - 09/28/2006 0825 *Instructions:*	
	• Sinton, Gregory L - Approve - Approved with comments - 09/28/2006 1204 *Instructions:*	
	• French, Mark S - Approve - Approved with comments - 09/28/2006 1303 *Instructions:*	
	• Frey, Jeffrey A - Approve - Approved with comments - 09/29/2006 0929 *Instructions:* ↳ *Routing List:* TPA - Inactive *Instructions:* • Morrison, Ron - Review - Cancelled - 09/28/2006 1640	

Task# DOE-AMCP-C-2006-0312	
	• Jackson, Dale E - Approve - Approved - 09/28/2006 1310 *Instructions:*
	• Hollowell, Betty L - Approve - Approved with comments - 09/29/2006 1052 *Instructions:*
	• McCormick, Matthew S - Approve - Approved with comments - 09/29/2006 0954 *Instructions:*
	• Weis, Michael J - Approve - Awaiting Response *Instructions:*
	• Klein, Keith A - Approve - Awaiting Response *Instructions:*
ATTACHMENTS	
Attachments	1. 06-AMCP-0312 Attachment.doc 2. 06-AMCP-0312 Letter.doc
COLLABORATION	
COMMENTS	
Poster	Collins, Michael S (Collins, Michael S) - 09/28/2006 0809
	Approve
	1. Record Note - Change "RL-0013" to "RL-0013 and RL-0040."
Poster	Sinton, Gregory L (Sinton, Gregory L) - 09/28/2006 1209
	Approve
	Change last sentence of Record note to read: "This M-16-93 Work Plan was previously reviewed by RL-0013 and RL-0040 IPT memebers within AMCP. Comments have been incorporated. Change signature to Keith Klein.
Poster	French, Mark S (French, Mark S) - 09/28/2006 0109
	Approve
	Please modify the end of the first sentence to read: "processing of remote handled and large container mixed low level and transuranic wastes."
Poster	McKibban, Nancy (McKibban, Nancy) - 09/28/2006 0209
	Collins, Michael S -- Approve
	Comments have been incorporated.njm
Poster	McKibban, Nancy (McKibban, Nancy) - 09/28/2006 0209
	Sinton, Gregory L -- Approve
	Comments have been incorporated
Poster	McKibban, Nancy (McKibban, Nancy) - 09/28/2006 0209
	French, Mark S -- Approve
	Letter has been modified and comments have been incorporated.njm
Poster	Frey, Jeffrey A (Frey, Jeffrey A) - 09/29/2006 0909
	Approve
	Recommend approval based on need to meet milestone date. Complies with basic requirement s for submittal, but we need to understand that EPA may not be fully satisfied, and may result in future issues with TRUM discussions/milestones.

Task# DOE-AMCP-C-2006-0312			
Poster	McCormick, Matthew S (Hintzen, Kathryn M) - 09/29/2006 0909		
	Approve		
	Matt McCormick concurred by hard copy with Attachment revised to include PFP information added to the first paragraph under Currently Projected Volume of Transuranic Waste Generated as a Result of CERCLA Actions.		
Poster	Hollowell, Betty L (Corbin, Peggy A) - 09/29/2006 1009		
	Approve		
	Approve. Based on review and comments by BD Williamson, I recommend the attachment be titled something other than "Introduction," perhaps "Implementation Plan" as referenced in letter. BLH 9/29/06.		
TASK DUE DATE HISTORY			
Modified	09/27/2006 1655 - McKibban, Nancy (McKibban, Nancy)	**New Due Date**	09/29/2006 1200
SUB TASK HISTORY			
Subtask#	DOE-AMCP-C-2006-0312.1		
Subject	"D U E 9 / 3 0 / 0 6" (TRI-PARTY AGREEMENT) MILESTONE M-16-93, SUBMITTAL OF IMPLEMENTATION WORK PLAN DUE SEPTEMBER 30, 2006		
Originator	Hollowell, Betty L		
	Routing List	*No Active Routing List*	

-- end of report --

Task# DOE-AMCP-C-2006-0312

E-STARS™ Report
Task Detail Report
09/28/2006 0810

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