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Richland Field Office
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Richland, Washington 99352

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SEP 24 1993

93-RPA-284

Mr. Doug Sherwood
Hanford Project Manager
U.S. Environmental Protection Agency
Region 10
1200 Sixth Avenue, HW-124
Seattle, Washington 98101

Mr. Roger F. Stanley, Director
Tri-Party Agreement Implementation
State of Washington
Department of Ecology
P.O. Box 47600
Olympia, Washington 98504-7600

Dear Messrs. Sherwood and Stanley:

HANFORD FEDERAL FACILITY AGREEMENT AND CONSENT ORDER MILESTONE CHANGE CONTROL
FORM M-32-92-01

Negotiations on a Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) interim status dangerous waste tank systems milestone have been conducted since May 1990. This milestone establishes Tri-Party Agreement compliance schedules for correcting known compliance deficiencies in certain Hanford interim status dangerous waste tank systems while allowing the continued operation of those tank systems.

On August 31, 1993, the U.S. Department of Energy, Richland Operations Office (RL), Westinghouse Hanford Company, and the State of Washington Department of Ecology (Ecology) met and discussed M-32 in Yakima, Washington. As a result of this meeting, RL and Ecology agreed that it would be appropriate for the M-32 milestone to be included in the ongoing Tri-Party Agreement negotiations. The M-32 milestone is ready for public comment and review. A Change Control Form and a copy of the draft M-32 milestone, as discussed, is provided in the enclosure.



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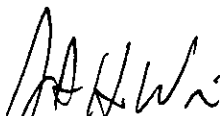
Messrs. Sherwood and Stanley
93-RPA-284

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SEP 24 1993

If you have any questions regarding this transmittal, please contact me or Mr. P. J. Krupin on (509) 372-1112.

Sincerely,



Steven H. Wisness
Hanford Project Manager

EAP:PJK

Enclosure

cc w/encl:

B. A. Austin, WHC
B. G. Erlandson, WHC
G. W. Jackson, WHC, w/o encl.
T. Michelena, Ecology
T. G. Tebb, Ecology
D. B. Jansen, Ecology
D. C. Nylander, Ecology

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M-32-92-01	Federal Facility Agreement and Consent Order Change Control Form	Date
Originator Paul J. Krupin		Phone (509) 372-1112
Class of Change <input checked="" type="checkbox"/> I - Signatories <input type="checkbox"/> II - Project Manager <input type="checkbox"/> III - Unit Manager		
Change Title Interim Status Dangerous Waste Tank Systems Hanford Federal Facility Agreement and Consent Order Milestone, M-32.		
Description/Justification of Change Add milestone. The proposed milestone establishes Tri-Party Agreement compliance schedules for the Hanford interim status dangerous waste tank systems.		
Impact of Change This change establishes a new major milestone with interim milestones. Completion of interim milestone tasks may identify the need for additional actions or interim milestones in the future. This milestone does not impact any other Tri-Party Agreement interim or major milestone.		
Affected Documents Affected Documents: Hanford Federal Facility Agreement Consent Order Action Plan, Appendix D, Figure D-1 Work Schedule, and Table D-3.		
Approvals _____ Approved _____ Disapproved DOE _____ Date _____ EPA _____ Date _____ Ecology _____ Date _____		

Proposed Interim Status Dangerous Waste Tank Systems Hanford Federal
Facility Agreement and Consent Order Milestone
M-32

- M-32-00 **Complete Identified Dangerous Waste Tank
Corrective Actions.** Sept. 99
- Completion of interim milestone tasks may identify the need for additional actions or interim milestones in the future. The reports and deficiency correction schedules prepared to satisfy current milestones will be used to identify any appropriate new interim milestones. Any new interim milestones will subsequently be established via the change process in Section 12 of the Action Plan.
- Tank integrity assessments will not be required for terminal cleanout of the Plutonium-Uranium Extraction Plant, except for Tanks F18, U3, and U4. Integrity assessments for Tanks F18, U3, and U4 have been completed.
- M-32-01 **Complete Plutonium Finishing Plant (PFP) Tank
Interim Status Actions.** Dec. 94
- The liquid waste volume generated as a result of the PFP stabilization campaign will be limited to a total of 300,000 gallons. Following the stabilization campaign, PFP will not initiate any additional mission(s), except as described below, that results in the discharge of waste to the 241-Z tanks prior to completion of tank system upgrades necessary for compliance with state and federal dangerous waste regulations.
- Glove-box scale stabilization, laboratory, plant maintenance, and miscellaneous support activities necessary for the safe, secure storage of special nuclear material and protection of personnel and the environment will continue. Discharge to 241-Z following the stabilization campaign will be limited to 50,000 gallons per year until compliance is achieved or terminal cleanout is completed. Any terminal cleanout discharge requirements in excess of 50,000 gallons per year will be reviewed and approved by the three parties prior to implementation.
- M-32-01-T01 **Complete and submit integrity assessment report
for PFP interim status tank system. Provide a
schedule to address any deficiencies described in
the report related to tank system compliance
(Deficiencies not addressed in this schedule will
be addressed in the compliance strategy of target
action M-32-01-T02).** Oct. 93
- M-32-01-T02 **Submit proposed compliance strategy for remaining
dangerous waste tank system issues.** June 94

M-32-01-T03	Complete construction of piping upgrades between 234-5Z, 236-Z and 241-Z Tank System (Project C-031H).	Dec. 94
M-32-02	Complete 219-S Tank Interim Status Actions.	Sept. 97
M-32-02-T01	Provide notification of completion of Definitive Design for Project W-178 - Construction of Interim Status Tank System Upgrades for 219-S Tank System.	Jan. 96
M-32-02-T02	Upgrade existing transfer lines to meet secondary containment requirements.	Sept. 97
M-32-03	Complete T Plant Tank Actions.	Sept. 99
M-32-03-T01	Implement periodic visual inspection and static leak test program for 2706-T and 211-T tanks.	Oct. 93
M-32-03-T02	Complete Conceptual Design Report (Project W-259) for T Plant tank system upgrades.	Apr. 94
M-32-03-T03	Submit schedule for completion of T Plant tank system upgrades (Project W-259).	June 94
M-32-03-T04	Complete modification of 2706-T Staging Pad to eliminate accumulation of precipitation.	June 94
M-32-03-T05	Install level indication device for 211-T tank.	June 94
M-32-03-T06	Complete scheduled upgrades to T Plant tank system (Project W-259).	Sept. 99
M-32-04	Complete Double-Shell Tank Interim Status Tank Actions.	June 94
M-32-04-T01	Submit design standards review for one tank farm.	Sept. 93
M-32-04-T02	Prepare and submit report documenting non-destructive examination equipment development and implementation plans.	Sept. 93
M-32-04-T03	Complete all DST visual examination and prepare and submit reports.	Sept. 93
M-32-04-T04	Complete and submit the Transfer Facility Compliance Plan.	June 94
M-32-04-T05	Submit to Ecology a final plan and schedule for completion of the Double-Shell Tank integrity assessments.	June 94
M-32-05	Complete 242-A Evaporator Interim Status Tank Actions.	1 Month after hot restart
M-32-05-T01	Complete and submit integrity assessment report for the 242-A Evaporator interim status tank system. Provide a schedule to address any deficiencies described in the report related to tank system compliance.	1 Month after hot restart

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M-32-06	Complete 244-AR Vault Interim Status Tank Actions.	Prior to restart
M-32-06-T01	Complete and submit integrity assessment report and identified upgrades for 244-AR Vault interim status tank system (except that DST transfer lines that penetrate the 244-AR Vault will continue to be used). Provide a schedule to address any deficiencies described in the report related to tank system compliance.	Prior to restart
M-32-07	Complete B Plant Interim Status Tank Actions.	Dec. 95
M-32-07-T01	Identify additional dangerous waste tanks and ancillary equipment that will be routinely used during cleanout and stabilization activities. Submit schedule to perform integrity assessments on identified additional dangerous waste tanks and ancillary equipment.	Apr. 94
	B Plant will not accept any waste for treatment, except waste generated as a result of on-going B Plant/WESF operations, without completion of tank integrity assessments and completion of upgrades necessary for compliance with WAC 173-303-640 or an applicable permit on systems used for the treatment, storage or disposal of the waste.	
M-32-07-T02	Complete and submit integrity assessment plan for Tanks 25-1, 25-2, 23-1, concentrator E-23-3, and identified ancillary equipment.	Oct. 94
M-32-07-T03	Complete and submit integrity assessment report for Tanks 25-1, 25-2, 23-1, concentrator E-23-3, and ancillary equipment as identified in the integrity assessment plan. Provide a schedule to address any deficiencies described in the report related to tank system compliance.	Dec. 95
	The integrity assessment report of the low level waste concentrator, E-23-3, and the concentrated waste receiver, TK-23-1, will be completed only if their operation is planned beyond December 1995. The determination to include these two tanks in the integrity assessment report will be made by October 1994.	
M-32-08	Complete Grout Interim Status Tank Actions.	Prior to processing DST waste
M-32-08-T01	Complete and submit integrity assessment report for Grout interim status tank system. Complete activities required to correct any deficiencies described in the report related to tank system compliance.	Prior to processing DST waste

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CORRESPONDENCE DISTRIBUTION COVERSHEET

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 Addressee: D. R. Sherwood, EPA
 R. F. Stanley, Ecology
 Correspondence No.: Incoming: 9306325
 Subject: HANFORD FEDERAL FACILITY AGREEMENT AND CONSENT ORDER MILESTONE CHANGE
 CONTROL FORM M-32-92-01

INTERNAL DISTRIBUTION

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