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Meeting Minutes Transmittal - Approved

**Unit Managers Meeting
4843 ALKALI METAL STORAGE FACILITY
2440 STEVENS CENTER, RM 2100
Richland, Washington**

**Meeting Held May 17, 1994
From 2:30 pm to 4:00 pm**

The undersigned indicate by their signatures that these meeting minutes reflect the actual occurrences of the above dated Unit Managers Meeting.

Randall N. Krekel Date: 6-16-94
Randall N. Krekel, Unit Manager, RL

Not present. Date: _____
Daniel L. Duncan, RCRA Program Manager, EPA Region 10

Alisa D. Huckaby Date: 6-16-94
Alisa D. Huckaby, Unit Manager, Washington State Department of Ecology

4843 Alkali Metals Storage Facility, WHC Concurrence

Fred A. Ruck III Date: 6/16/94
Fred A. Ruck III, Contractor Representative, WHC

J. A. (Mickey) Seamans Date: 6/16/94
J. A. (Mickey) Seamans, Contractor Representative, WHC

Purpose: Discuss Permitting Process

- Meeting Minutes are attached. The minutes are comprised of the following:
- Attachment 1 - Agenda
 - Attachment 2 - Summary of Discussion and Commitments/Agreements
 - Attachment 3 - Attendance List
 - Attachment 4 - Action Items



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Attachment 1

Unit Managers Meeting
4843 ALKALI METAL STORAGE FACILITY
2440 STEVENS CENTER, RM 2100
Richland, Washington

Meeting Held May 17, 1994
From 2:30 pm to 4:00 pm

Agenda

1. Approval of Past UMM Minutes
2. Status Action Items
 - 7-14-93:1 Arrange for Ecology to attend radiation survey of 4843 AMSF
 - 7-14-93:2 Provide Ecology with copy of the radiation survey procedure
 - 2-18-94:1 Arrange and schedule the DQO meeting for 4843 AMSF.
 - 3-17-94:1 Provide aerial photographs of 4843 AMSF to Ecology.
 - 4-14-93:1 Add the information to the Administrative Record.
3. Status Closure Activities
 - Status of RL/WHC response to NOD Comments
 - Status on response to Comment No. 15 (action levels)
 - Status on response to Comment No. 61 (cost estimates)
4. New Business
 - None
5. Set Next Meeting Date

Attachment 2

Unit Managers Meeting
4843 ALKALI METAL STORAGE FACILITY
2440 STEVENS CENTER, RM 2100
Richland, Washington

Meeting Held May 17, 1994
From 2:30 pm to 4:00 pm

Summary of Discussion and Commitments/Agreements

1. Approval of Past UMM Minutes

The April 14, 1994 meeting minutes were reviewed and approved.

2. Status Action Items

- 7-14-93:1 Arrange for Ecology to attend radiation survey of 4843 AMSF

Pending. Awaiting removal of waste from 4843 AMSF and scheduling of the survey. An additional waste overpack container is needed before the final waste shipment can occur. Delivery of the overpack is behind schedule. This has stretched the date of the survey into the 3rd quarter of 1994.

- 7-14-93:2 Provide Ecology with copy of the radiation survey procedure

Pending. Radiation survey documents will be provided once the date of the survey is determined. Copies of the Health Physics Procedures (WHC-IP-0718) and the WHC Radiological Control Manual (WHC-CM-1-6) were provided to Ecology at the December 14, 1993 UMM.

- 2-18-94:1 Arrange and schedule the DQO meeting for 4843 AMSF.

Pending. The DQO meeting will be scheduled after completion of the 4843 AMSF radiation release survey.

- 3-17-94:1 Provide aerial photographs of 4843 AMSF to Ecology.

Pending. Work to collect the aerial photos is continuing.

- 04-14-93:1 Add the information to the Administrative Record.

Pending. The pertinent information has not yet been developed.

3. Status Closure Activities

- Status of RL/WHC response to NOD Comments

- Status on response to Comment No. 15 (action levels)

WHC (J. G. Adler) stated that a formal response is not ready at this time. However, WHC is leaning toward retaining the term in the closure plans. It is felt that 'action levels' is appropriate

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terminology and there is no regulatory driver for not including it. RL (R. N. Krekel) stated that this could also be discussed at the DQO meeting. Ecology (A. D. Huckaby) stated that retaining the term 'action levels' was not acceptable. This comment remains unresolved.

- Status on response to Comment No. 61 (cost estimates)

WHC (J. G. Adler) stated that additional cost estimates will not be provided under the individual closure plans. Closure cost estimates will be provided per the site-wide permit. In addition, Ecology is being provided with information on the budgeting process at Hanford. Ecology (A. D. Huckaby) indicated that this was not acceptable. This comment remains unresolved.

After being provided the responses to the above comments, Ecology (A. D. Huckaby) asked how RL/WHC would be responding to the comments. RL (R. N. Krekel) stated that the comments would remain open until the NOD Response Table was submitted to Ecology along with the revised closure plan. Also, revision of the closure plan would not occur until mutual agreement was reached by the Ecology and RL Unit Managers.

4. New Business

- Drum spacing at 4843 AMSF

Ecology (A. D. Huckaby) stated that an Ecology RCRA compliance inspector (S. V. Moore) has identified the absence of 30-in spacing between the waste drums stored in the 4843 AMSF as a compliance issue. WHC (S. A. Szendre and J. A. Seamans) reported on the issue: The current drum configuration was set up as an ALARA measure to minimize the radiation exposure to the operator doing the weekly inspections. Drums with low dose rates are used to shield the operator from drums with higher dose rates. The current configuration results in a dose of less than 2 mrem per inspection. It is recognized that this does not negate the Dangerous Waste Regulations (WAC 173-303) requirement for 30-in spacing.

FFTF's intention is to come into 'voluntary compliance' by reconfiguring the drums. The new configuration will meet the 30-in spacing requirements and will allow for preparation of the drums for shipment to the Central Waste Complex (CWC). A dose rate map of the drums will be completed by Tuesday, May 24. (Ecology requested a copy.) The map will be used in estimating the dose rates that the operators reconfiguring the drums will receive and to estimate the dose rates coming off the reconfigured drums. Then drums will then be reconfigured to the 30-in spacing requirement. Then drums and other waste containers will then be labeled for shipment. The new labeling will provide required shipping information for the waste containers, as specified in the SDAR. Transportation will then be scheduled for shipping the waste to the CWC.

Reconfiguring the drums should occur in late May or early June at the latest. The best estimate for shipping to the CWC is mid to late June. Past experience indicates that it could be as late as

July. (Ecology requested to be informed when the shipping was scheduled and requested to be provided with the shipping documentation.) The appropriate storage containers are at the CWC for this waste. Most of the preliminaries have been completed.

All of the waste will be shipped to the CWC, except for one waste container that requires a Department of Transportation specification overpack container. The one remaining container will be shipped to the CWC after the overpack arrives. The overpack is being procured from off-site and is late being delivered.

Ecology (A. D. Huckaby) asked if this issue would have any impact on the closure plan. WHC (J. G. Adler) stated that there is no impact. The sampling strategy does not depend upon the drum spacing or exact configuration of the radiation zone. RL (R. N. Krekel) asked if Ecology had submitted anything formally on this issue yet? Ecology responded that they were waiting for the informal response from RL/WHC, which is being given at this UMM. And that they were willing to wait until RL/WHC provided some of the information requested at this UMM.

WHC (J. G. Adler) clarified the administrative lines of communication for this issue. Since the drum spacing was predominately a compliance issue, the primary response action and communications channel will be through WHC RCRA Compliance Support to RL and Ecology (both the 4843 AMSF Unit Manager and the RCRA compliance inspector). Acting for the RL and Ecology 4843 AMSF Unit Managers, WHC RCRA Permits will continue to use the UMM meeting minutes to document the progress and decisions made concerning this issue.

5. Set Next Meeting Date

The next meeting has been set for June 14, 1994, for 2:30 pm in Richland, Washington.

Attachment 4

Unit Managers Meeting
4843 ALKALI METAL STORAGE FACILITY
2440 STEVENS CENTER, RM 2100
Richland, Washington

Meeting Held May 17, 1994
From 2:30 pm to 4:00 pm

Action Items

<u>Action Item #</u>		<u>Description</u>
07-14-93:1	OPEN	Arrange for Ecology to attend radiation survey of 4843 AMSF. (WHC: J. G. Adler)
07-14-93:2	OPEN	Provide Ecology with copy of the radiation survey procedure. Current commitment is for a copy of an old radiation survey report. (WHC: J. G. Adler)
02-18-94:1	OPEN	Arrange and schedule the DQO meeting the 4843 AMSF. (WHC: J. G. Adler)
03-17-94:1	OPEN	Provide aerial photographs of the 4843 AMSF to Ecology. (WHC: J. G. Adler)
04-14-93:1	OPEN	Add the following to the Administrative Record: Field logbook(s); analytical results; PE's logbook; and the radiation survey results. (WHC: J. G. Adler)

Distribution:

J. G. Adler	WHC	H6-23
J. K. Bartz	GSSC	B1-42
R. M. Carosino	RL	A4-52
D. L. Duncan	EPA	HW-106 (Seattle)
O. A. Farabee	RL	N1-39
R. G. Hastings	RL	N1-39
A. D. Huckaby	Ecology	B5-18
R. N. Krekel	RL	A5-15
P. J. Mackey	WHC	B3-15
S. M. Price	WHC	H6-23
F. A. Ruck III	WHC	H6-23
J. A. Seamans	WHC	N2-04
S. A. Szendre	WHC	H6-30
J. L. Waite	WHC	B2-35
RCRA file/GHL	WHC	H6-23
Field File Custodian	WHC	H6-08

ADMINISTRATIVE RECORD: 4843 ALKALI METAL STORAGE FACILITY (S-4-1) [Care of EPIC, WHC (H6-08)]

Washington State Department of Ecology Nuclear and Mixed Waste, Hanford Files,
P.O. Box 47600, Olympia, Washington 98504-7600

Environmental Protection Agency Region 10, Seattle, Washington 98101,
Record Center, Mail Stop HW-074

Please send comments on distribution list to Kari R. Schmildi (H6-23),
(509) 373-2083.