



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

0055403

01-RCA-417

AUG 29 2001

Mr. Michael A. Wilson, Program Manager
Nuclear Waste Program
State of Washington
Department of Ecology
P.O. Box 47600
Olympia, Washington 98504

RECEIVED
SEP 06 2001

EDMC

Dear Mr. Wilson:

PLUTONIUM FINISHING PLANT (PFP) HANFORD FEDERAL FACILITY AGREEMENT
AND CONSENT ORDER (TRI-PARTY AGREEMENT) MILESTONE M-83-10 HANFORD
PU STABILIZED SOLUTIONS.

Enclosed is the signed Tri-Party Agreement Change Request M-83-01-04 for the direct discard solidification of solutions. This change request establishes Tri-Party Agreement Milestone M-83-10, complete solidification of selected plutonium-bearing solutions currently located in PFP and shipment to the Central Waste Complex. The change request was developed with the support and input from the State of Washington Department of Ecology's (Ecology) staff at the Kennewick office. The U.S. Department of Energy, Richland Operations Office, appreciates Ecology's contribution and ongoing efforts to move this project to completion. If you have any questions, please contact Jon Yerxa, of my staff, on (509) 376-9628.

Sincerely,

Joel Hebdon, Director
Regulatory Compliance and Analysis Division

RCA:JKY

cc: See page 2

Change Number M-83-01-04	Federal Facility Agreement and Consent Order Change Control Form Do not use blue ink. Type or print using black ink.	Date 8/23/2001
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Originator Larry Romine	Phone 376-4747
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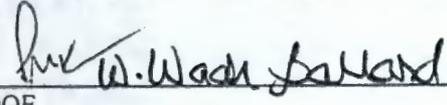
Class of Change		
<input type="checkbox"/> I - Signatories	<input checked="" type="checkbox"/> II - Executive Manager	<input type="checkbox"/> III - Project Manager

Change Title Establish one new PFP interim milestone for the direct discard (solidification) of solutions (M-83-10).

Description/Justification of Change This change request deals only with those plutonium-bearing solutions that are currently located at the Plutonium Finishing Plant (PFP) that are selected to be solidified and disposed of as TRU-mixed waste in support of DNFSB plutonium stabilization milestones. These plutonium-bearing solutions will be managed in accordance with WAC 173-303-400, unless otherwise noted in Section 1. The Parties have agreed in TPA CR M-83-01-02 to initiate PFP transition/disposition negotiations no later than November 1, 2001.

Impact of Change Approval of this change request establishes a new interim milestone governing the solidification of selected plutonium-bearing solutions currently located at PFP. On approval, Hanford Site planning and budget development documents (e.g., Multi Year Work Plans, Site Wide Systems Engineering Control Documents, and Project Management Plans) will be modified as required.

Affected Documents The Hanford Federal Facility Agreement and Consent Order, as amended, DOE's Annual Land Disposal Restrictions Report, and Hanford Site internal planning and budget documents (e.g., Agreement Action Plan, Appendix D, DOE and DOE contractor Baseline Change control documents, Multi Year Work Plans, Sitewide Systems Engineering Control Documents, Project Management Plans, and the Hanford Site Integrated Priority List).
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Approvals		
 _____ DOE	8/28/01 _____ Date	<input checked="" type="checkbox"/> Approved _____ Disapproved
N/A _____ EPA	_____ Date	<input type="checkbox"/> Approved _____ Disapproved
_____ Ecology	_____ Date	<input type="checkbox"/> Approved _____ Disapproved

Description of Locations and Processes Covered by this Change Request.

1. Scope

This Change Request covers regulated dangerous waste activities required to solidify those plutonium-bearing solutions currently located at PFP that are selected to be solidified and disposed of as TRU-mixed waste in support of DNFSB milestones, and the subsequent storage and transfer of the solidified waste forms to the Central Waste Complex (CWC). These activities will be conducted in various areas of PFP as described in the technical process description paper, "*Solutions Direct Discard Process*." The Parties have agreed in TPA CR M-83-01-02 to initiate PFP transition/disposition negotiations no later than November 1, 2001.

The solidification of the selected plutonium-bearing solutions will be carried out in compliance with the applicable and substantive requirements of Washington Administrative Code (WAC) 173-303-400, unless otherwise noted in the technical process description paper, *Solutions Direct Discard Process* or its attachment, *Direct Discard Compliance Matrix*, and stored at PFP pending transfer to the Central Waste Complex (CWC).

2. Identification of Waste

Approximately 1100 liters of low-plutonium concentration solutions currently in poly bottles and product receiver (PR) containers have been identified as candidates for possible solidification and disposal as TRU-mixed waste. If nondestructive analysis (NDA) confirms the low plutonium concentrations, the container's contents will be selected for solidification as described in the technical process description paper, "*Solutions Direct Discard Process*."

3. Characterization and Sampling

Sampling and characterization are described in the technical process description paper, "*Solutions Direct Discard Process*." PFP will complete waste designation of each group of solutions prior to initiating the solidification activity for that group.

4. Container Management

The containers holding the candidate dilute plutonium solutions will be removed from storage and analyzed for plutonium content using nondestructive analysis (NDA) equipment. If the candidate solution container contents meet the limit established to ensure criticality safety, then the selected container will be moved into Room 185 for solidification. The equipment in Room 185 will include a temporary radiological containment system consisting of a large tent enveloping three plastic glovebag-type enclosures. The enclosure also provides for secondary containment. The details are described in the technical process description paper, "*Solutions Direct Discard Process*."

5. Disposition of Waste (Interim and Final Locations)

The solidified matrix will be contained in drums that will be moved from Room 185, weighed, and then analyzed for plutonium content using NDA equipment. Once counted and determined to be acceptable, they will be stored in Room 235-D until relocated to a suitable staging area for preparation, loading, and transfer to CWC. The transfer of the solidified drums to CWC will occur no later than March 31, 2002. The details are described in the technical process description paper, "*Solutions Direct Discard Process*."

6. Schedule

The schedule and deliverables for performing this work are described in the M-83-10 milestone below.

This change control form establishes the following interim milestone for the solidification of the selected plutonium-bearing solutions and disposition as TRU-mixed waste.

"Does not contain classified or unclassified controlled nuclear information"

<u>Interim</u>	<u>Description</u>	<u>Due Date</u>
M-83-10	Complete solidification of selected plutonium-bearing solutions currently located in PFP and shipment to the Central Waste Complex for storage.	March 31, 2002

“Does not contain classified or unclassified controlled nuclear information”

Mr. Michael A. Wilson
01-RCA-417

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AUG 29 2001

cc: R. Bond, Ecology
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