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Department of Energy

Richland Field Office

P.O. Box 550

Richland, Washington 99352

MAY 23 1994

94-SWT-260

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

Mr. Douglas R. Sherwood
Hanford Project Manager
U.S. Environmental Protection Agency
712 Swift Boulevard, Suite 5
Richland, Washington 99352



Dear Messrs. Sherwood and Stanley:

CHANGE REQUEST M-19-94-01: REVISE M-19 MILESTONES TO ALLOW OPTIONS FOR COMMERCIAL TREATMENT OF LOW LEVEL RADIOACTIVE MIXED WASTES

The subject formal Class I Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) change control form M-19-94-01: "Revise M-19 Milestones to allow options for commercial treatment of Low Level Radioactive Mixed Wastes," has been approved by the U.S. Department of Energy, Richland Operations Office (RL) and is hereby transmitted for your approval. In accordance with revised Tri-Party Agreement Article XL, paragraph 122, your action is requested within the specified 14 day period.

As you are aware, RL has been evaluating alternative concepts for providing certain waste processing systems at Hanford to meet Tri-Party Agreement milestones. Aggressive pursuit of these alternatives is essential for maintaining cost effective and timely acquisition of major new facilities/systems, especially in light of the high capital costs involved with these facilities/systems and the expected funding limitations that are becoming increasingly apparent.

In our approach to reducing the high capital costs associated with acquisition of major new facilities/processes, commercialization, or privatization is seen as a viable option. The private sector currently has the capability of meeting some of our key treatment and disposal needs by utilizing existing technology. With your cooperation, RL feels strongly that we can implement a cost effective plan for bringing these commercial capabilities to bear on certain of our current needs. However, just as approval of this change request is needed, so too is the assistance from your agencies in making these commercial applications both realistic and timely.

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Messrs. Sherwood and Stanley
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Many issues regarding the details of applying commercial talent toward the cleanup of Hanford must be worked out by the Project and Unit Managers, but, we certainly see these efforts as fruitful for the future of Hanford cleanup and for the region at large. Approval of this change request will represent one more step toward making these commercial applications a reality at Hanford. We are excited about the possibilities of applying this toward completion of the M-19 milestones and anxiously look forward to working with you to make it happen.

Should you have any questions regarding this matter, please feel free to call me on (509) 376-2028 or Ms. J. M. Hennig of the Waste Management Division on (509) 376-1366.

Sincerely,



Patrick W. Willison
Acting Hanford Project Manager

Enclosure:
Federal Facility Agreement and
Consent Order Change Control Form

cc: L. D. Arnold, WHC
S. D. Godfrey, WHC
W. H. Hamilton, Jr., WHC
F. Olson, Ecology
N. Pierce, Ecology
R. J. Roberts, WHC

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Attachment 1

Change Request M-19-94-01

Page 1 of 3

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Change Number M-19-94-01	Federal Facility Agreement and Consent Order Change Control Form <small>Do not use blue ink. Type or print using black ink.</small>	Date April 20, 1994									
Originator M. M. McCarthy		Phone (509) 376-1589									
Class of Change <input checked="" type="checkbox"/> I - Signatories <input type="checkbox"/> II - Project Manager <input type="checkbox"/> III - Unit Manager											
Change Title Revise M-19 Milestones to Allow Options for Commercial Treatment of Low Level Radioactive Mixed Wastes											
Description/Justification of Change The current M-19 milestones are as follows: <table style="width:100%; border: none;"> <tr> <td style="width:15%;">M-19-00</td> <td style="width:70%;">Complete WRAP Module II Construction and Initiate Operations</td> <td style="width:15%; text-align: right;">9/30/1999</td> </tr> <tr> <td colspan="3" style="padding: 5px;">The WRAP Module II will include waste treatment capabilities to minimize land disposal of low-level radioactive waste and radioactive mixed waste. The September 1999 completion date of WRAP Module II is critical to achieving compliance for the management of wastes that are prohibited from land disposal and extended storage. WRAP Module 2 will provide for treatment of secondary solid waste resulting from treated effluent disposal systems.</td> </tr> <tr> <td>M-19-01</td> <td>Complete WRAP Module II Construction</td> <td style="text-align: right;">9/30/1998</td> </tr> </table> <p style="text-align: right;">(Continued on next page)</p>			M-19-00	Complete WRAP Module II Construction and Initiate Operations	9/30/1999	The WRAP Module II will include waste treatment capabilities to minimize land disposal of low-level radioactive waste and radioactive mixed waste. The September 1999 completion date of WRAP Module II is critical to achieving compliance for the management of wastes that are prohibited from land disposal and extended storage. WRAP Module 2 will provide for treatment of secondary solid waste resulting from treated effluent disposal systems.			M-19-01	Complete WRAP Module II Construction	9/30/1998
M-19-00	Complete WRAP Module II Construction and Initiate Operations	9/30/1999									
The WRAP Module II will include waste treatment capabilities to minimize land disposal of low-level radioactive waste and radioactive mixed waste. The September 1999 completion date of WRAP Module II is critical to achieving compliance for the management of wastes that are prohibited from land disposal and extended storage. WRAP Module 2 will provide for treatment of secondary solid waste resulting from treated effluent disposal systems.											
M-19-01	Complete WRAP Module II Construction	9/30/1998									
Impact of Change This change will consolidate the existing M-19 milestones into a single milestone to allow for the possible commercialization of waste treatment capabilities provided by WRAP Module 2A. <p style="text-align: right;">(Continued on next page)</p>											
Affected Documents Hanford Federal Facility Agreement and Consent Order, Forth Ammendment, January 1994, Appendix D (Table D, pages D-41 and D-42, and Action Plan Work Schedule, page 13 of 40)											
Approvals											
_____ DOE	_____ Date		___ Approved ___ Disapproved								
_____ EPA	_____ Date		___ Approved ___ Disapproved								
_____ Ecology	_____ Date		___ Approved ___ Disapproved								

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Description/Justification of Change (continued)

The revised M-19 milestones are as follows:

M-19-00 Provide Capability for Treatment of Low Level Radioactive Mixed Wastes. 9/30/1999

The WRAP Module 2A or its commercial equivalent will include waste treatment capabilities to minimize land disposal of low level radioactive mixed waste. The September, 1999 completion date of this milestone is critical to achieving compliance for the management of wastes that are prohibited from land disposal and extended storage.

M-19-01 Complete WRAP Module II Construction 9/30/1998 (Deleted)

Commercialization or privatization of certain waste processing systems at Hanford is a viable means for reducing near-term capital funding requirements, while at the same time cutting back construction and startup schedules to allow for early operation of major new facilities and/or processes. Hanford is currently exploring these options in the area of low level radioactive mixed waste treatment. Specifically, it is the intent of Hanford to explore the commercialization options for WRAP 2A.

Impact of Change (continued)

WRAP 2A or its commercial equivalent will fulfill the proposed M-19 milestone without impact to the original scheduled completion date of September, 1999.

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CORRESPONDENCE DISTRIBUTION COVERSHEET

Author

Addressee

Correspondence No.

S. H. Wisness, RL

D. R. Sherwood, EPA
R. F. Stanley, Ecology

Incoming: 9403666

Subject: CHANGE REQUEST M-19-94-01: REVISE M-19 MILESTONES TO ALLOW OPTIONS
FOR COMMERCIAL TREATMENT OF LOW LEVEL RADIOACTIVE MIXED WASTES

INTERNAL DISTRIBUTION

Approval	Date	Name	Location	w/att
		Correspondence Control	A3-01	
		President's Office		
		L. D. Arnold	B2-35	
		B. A. Austin	B2-35	
		S. D. Godfrey	B2-35	
		W. H. Hamilton, Assignee	N3-10	
		K. L. Hladek	H5-33	
		O. S. Kramer	B2-35	
		P. J. Mackey	B3-15	
		M. M. McCarthy	N3-13	
		H. E. McGuire, Level 1	B3-63	
		S. R. Moreno	B3-06	
		R. D. Morrison	B2-35	
		R. D. Pierce	T3-04	
		R. J. Roberts	B5-26	
		W. E. Ross	S5-07	
		J. A. Swenson	G6-45	
		EPIC	H6-08	



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