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Department of Energy

Richland Operations Office
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Richland, Washington 99352

92-TPA-056

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CORRESPONDENCE CONTROL

Ms. Dana A. Rasmussen
Regional Administrator
U.S. Environmental Protection Agency
Region 10
1200 Sixth Avenue
Seattle, Washington 98101

Mr. Chuck Clarke, Director
State of Washington
Department of Ecology
P.O. Box 47600
Olympia, Washington 98504-7600

Dear Ms. Rasmussen and Mr. Clarke:

WASTE RECEIVING AND PROCESSING FACILITY (WRAP) MODULE II RESCOPE

Attached for your review is the subject proposed draft Class I Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) Change Control Form. This proposed draft request rescopes the WRAP II facility to address the uncertainties of the final waste acceptance criteria for the Waste Isolation Pilot Plant. This proposed draft change request is consistent with the previous quarterly milestone meeting discussions. The facility is proposed to be rescoped into a mixed waste treatment module and a transuranic waste treatment facility.

In my recent letter to you concerning Single Shell Tanks, I discussed the utilization of a procedure for the future in which our organizations work together, informally, in a method which supplements the formal procedures of the Tri-Party Agreement. In correspondence to you, I outlined four steps that I believe will enhance the understanding of problems and provide avenue for jointly resolving issues. Those steps are:

(1) RL submit a written request to review potential modifications to milestones;

(2) Following approval of RL's request, the regulators jointly review the potential modification to Tri-Party Agreement milestones, with an allowance provided by the regulators for any delay in RL's progress towards meeting an established milestone while such reviews are being conducted;

(3) If agreement is reached by the parties, submit a formal change package by any party, as appropriate, to reflect the results of such a review; and

(4) If no agreement is reached, or if RL's request to review potential modifications is denied, any party may submit a formal change package as provided by the Tri-Party Agreement.

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In recent months, both U.S. Environmental Protection Agency and the State of Washington Department of Ecology (Ecology) have concurred, in varying degrees, with the benefits to this type of an approach. I now solicit your support for utilizing this same approach to work together to resolve the issues surrounding the separation of WRAP II into two modules. The fact that constraints and technical issues elsewhere have impacted this milestone have been discussed with your people at the Unit Manager and Project Manager levels. The Tri-Party Agreement change package is necessary for this milestone. We had committed to provide a change package to you, at the earliest possible time. We recognize that some time has passed since that commitment. However, it has been critical to obtain Headquarters input of this proposal prior to beginning our discussions on this proposed draft. Rather than send you a unilateral position, I want my people to work with your people to come to a cooperatively-derived, supportable change to this milestone.

Toward this end, I propose that Mr. Steven H. Wisness, coordinate a series of discussions between cognizant technical staff from your two organizations, RL and Westinghouse Hanford Company, with the objective to develop and process a change package for milestone M-19-00.

I ask that you support these discussions with resources available to you. My staff and I are eager to work together with you in this spirit of cooperation to provide timely resolution of this issue. Please contact me and provide your comments and, hopefully, your commitment to support this endeavor. Should you have questions, feel free to call me, or your staff may call Mr. S. H. Wisness on (509) 376-6798, or Mr. R. D. Izatt on (509) 376-5441.

Sincerely,

GR Hunter for
John D. Wagoner
Manager

EAP:SHW

Attachment

cc w/attach:
P. T. Day, EPA
N. Pierce, Ecology
D. B. Jansen, Ecology
~~I. R. Veneziano, WHC~~

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Change Number	Federal Facility Agreement and Consent Order Change Control Form	Date
M-19-91-1	Do not use blue ink. Type or print using black ink.	

Originator: R. D. Pierce

Phone: 6-5681

Class of Change

[X] I - Signatories [ ] II - Project Manager [ ] III - Unit Manager

Change Title

WRAP Module 2 Milestone Rescope (M-19-00, and M-19-01)

Description/Justification of Change

Due to technical uncertainties associated with the WIPP Waste Acceptance Criteria (WIPP-WAC), portions of the currently planned WRAP Module 2 Project will be delayed. Over the past five months efforts have been made to process Key Decision 0 (KD-0), which allows the start of conceptual design. However, due to continuing uncertainties with the WIPP-WAC, Hanford could not further develop conceptual designs for the TRU portion of the WRAP 2 waste stream until these uncertainties were solved. WIPP may not have a definitive WAC until 1994 or later. Therefore, Hanford proposes to modularize WRAP Module 2 into two sub-modules: 1) a mixed waste treatment unit (called Module 2A) for Low-Level Mixed Waste (LLMW), and 2) Module 2B for TRU waste requiring further treatment including large boxes and remote-handled TRU. Modularization will allow Hanford to proceed with appropriate treatment of LLW where treatment options are clearer, while awaiting necessary acceptance criteria from WIPP on TRU waste.

Impact of Change

The following are the current and proposed milestones:

CURRENT	DESCRIPTION	DUE DATE
M-19-00	Complete WRAP 2 construction and initiate operation	September 30, 1999
M-19-01	Complete WRAP 2 construction	September 30, 1998
PROPOSED:		
M-19-00	Complete WRAP 2A construction and initiate operation	September 30, 1999
	The WRAP Module 2A will include waste treatment capabilities for low-level radioactive waste and radioactive mixed waste. WRAP Module 2A is critical to achieving compliance for the management of wastes that are prohibited from land disposal and extended storage.	
M-19-01	Complete WRAP 2A construction	September 30, 1998
M-19-02	Complete Conceptual Design Report for WRAP 2A	September 30, 1992
M-19-03	Complete engineering study to develop alternatives for transuranic treatment and recommendation for treatment (includes WRAP 2B).	March 31, 1993

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Affected Documents

Hanford Federal Facility Agreement and Consent Order, Action Plan, Appendix D. Table D-3, and work schedule for Figure D-1.

Approvals ___ Approved ___ Disapproved

DOE _____ Date _____

EPA _____ Date _____

Ecology _____ Date _____

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Federal Facility Agreement and Consent Order
Change Control Form

IMPACT OF CHANGES (continued)

The Waste Receiving and Processing (WRAP) Module 2, Project W-100, was scoped to provide characterization, treatment, and packaging to permit permanent disposal of low-level and TRU waste. Waste sources to be treated are newly generated TRU and suspect TRU in containers too large or heavy to be handled in WRAP Module 1, non-thermally treatable LLMW, and all remote-handled TRU and LLMW. The WRAP 2 Facility has been changed to sub-modularize the original facility into two separate facilities and projects. The schedule listed above assumes a 32 month review and approval cycle for the Part B permit application concurrent with design-the initial Part B application submittal is based on the conceptual design with additional detail being provided during the Notice-of-Deficiency cycle .

DESCRIPTION OF CHANGE

The WRAP Module 2 scope remains the same but is sub-modularized into two different facilities and projects. The WRAP 2A Facility retains the original project identification as W-100 and the contact-handled (CH) LLMW treatment capability. The WRAP Module 2A Facility is a 1994 Line Item project. The other half of WRAP Module 2 is provided per the WRAP 2B Facility which has a new project number of W-255. The WRAP Module 2B Facility will provide characterization, treatment, and packaging required to permit permanent disposal of newly generated TRU and suspect TRU in containers too large or heavy to be handled in WRAP Module 1 and all RH-TRU waste and LLMW.

JUSTIFICATION

The design of a facility to process TRU waste to permit disposal at the WIPP is unacceptably risky at this time due to uncertainties associated with the WIPP-WAC and transportation requirements. However, the LLMW treatment portion of the original project scope, WRAP Module 2A, is not dependent on WIPP and is needed immediately to treat waste accumulating in storage since 1987 and waste projected to be generated or received at Hanford over the next twenty years. The TRU treatment capability, WRAP Module 2B, is delayed until resolution of WIPP uncertainties, but is still needed to retrieve and treat RCRA non-compliant suspect TRU waste in below ground storage and permit permanent disposal of TRU waste.

SCHEDULE STATUS

The WRAP Module 2A Functional Design Criteria (FDC) is currently under Westinghouse Hanford Company comment resolution. The WRAP Module 2A Conceptual Design Report (CDR) effort is scheduled to start in February of 1992.

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CORRESPONDENCE DISTRIBUTION COVERSHEET

Author	Addressee	Correspondence No.
J. D. Wagoner, RL	C. Clarke, Ecology D. A. Rasmussen, EPA	Incoming: 9203668

Subject: WASTE RECEIVING AND PROCESSING FACILITY (WRAP) MODULE II RESCOPE

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