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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

3100 Port of Benton Blvd • Richland, WA 99352 • (509) 372-7950

August 8, 2008

Mr. David A. Brockman
Richland Operations Office
United States Department of Energy
P. O. Box 550, MSIN: A7-50
Richland, Washington 99352

Re: Approval of *Hanford Federal Facility Agreement and Consent Order (HFFACO)*
Milestone, M-91-03 Project Management Plan (PMP), Revision 4

Dear Mr. Brockman:

The Department of Ecology approves *United States Department of Energy (USDOE) M-91 Transuranic Mixed/Mixed Low-Level Waste Project Management Plan, HNF-19169, Revision 4*. Ecology is pleased with the USDOE's effort. We are also pleased with the content of the document, including the incorporation of the Comprehensive Environmental Response, Compensation, and Liability Act supplemental information in Appendix C.

Ecology acknowledges that several HFFACO or Tri-Party Agreement (TPA) Change Control Forms are presented in Appendices U, V, W, and X of the PMP. Ecology's approval of the PMP does not constitute approval of the enclosed TPA Change Control Forms.

Also, you will find Ecology's comments on Revision 4 of the PMP that are to be incorporated in Revision 5 enclosed.

If there are any questions, contact Deborah Singleton at 509-372-7923, or Michelle Mandis at 509-372-7970.

Sincerely,

Jane A. Hedges
by *ER Kennisland*

Jane A. Hedges
Program Manager
Nuclear Waste Program

mm/pll
Enclosure
cc: Please see next page

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cc: Nick Ceto, EPA
Mark French, USDOE
Larry Romine, USDOE
Greg Sinton, USDOE
Robert Piippo, FH
Stuart Harris, CTUIR
Gabriel Bohnee, NPT
Russell Jim, YN
Susan Leckband, HAB
Ken Niles, ODOE
Administrative Record: M-91-03/PMP
Environmental Portal

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REVIEW COMMENT RECORD (RCR)

1. Date 8/4/2008

2. Review No.

3. Project No.

4. Page 1 of 7

5. Document Number(s)/Title(s)

Project Management Plan (HNF-19169, Rev. 4)

Project Manager Name

Deborah Singleton

Reviewer Name

J. Ollero; E. Van Mason;
M. Mandis

Ron Skinnarland

Organization Manager (Optional)

10. Agreement with indicated comment disposition(s)

Reviewer/Point of Contract

Reviewer/Point of Contract

Date

Author/Originator

Date

Author/Originator

Item	12. Page/Line	13a. Comment/Discrepancy (Provide technical and/or regulatory justification.)	13b. Recommended Change	14. (A)ccpt or (R)ejct	15. Disposition (Provide justification if NOT accepted.)	17. Status
1.	General	Editorial: Document is difficult to follow as written. Topics jump around.	Add section numbers to the subsections.			
2.	Page i, 2 nd Paragraph	Section mentions compliance case funding, but doesn't describe.	Add brief description of case funding to executive summary then add into page 42/43 where funding is discussed.			
3.	Page ii, 2 nd Paragraph	The last sentence states that "Only the December 31, 2007 M-91-42J Milestone to certify 4,200 m ³ of transuranic waste has not been completed."	Strike this sentence. USDOE and Ecology disagree that certification of all TRU(M) backlog as of 2002, is an M-91-42 Milestone.			
4.	General	Editorial: Verify acronyms. Many are used, but not spelled out throughout the document.				
5.	Page iii, 3 rd Paragraph	Discussion of T Plant in standby through FY 14 doesn't align with presentations provided by DOE in March. Please verify and adjust, if necessary.				
6.	Page iii	Insert M-91-45 consolidation next year and quick summary to meet the M-91-				

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		45 requirements.				
7.	Pages 3 & 4	"Waste Designation" Why isn't NDA/NDE used as part of the waste designation process?				
8.	Page 5	"CERCLA Waste" A brief mention is made of a ROD. What ROD? Is this referring to any CERCLA ROD? Or is this directed at a specific ROD? As worded too difficult to determine.	Please revise sentence for clarity.			
9.	Page 7	Clarify how "When a waste container is determined to potentially contain classified matter, the container will be segregated for storage and future disposition in a manner protective of human health and the environment and in accordance with DOE directives."				
10	Page 8	Add... The large decrease in total MLLW-07 projected volume for processing is due to the update in the assumptions of RSW composition "as described in Appendix H, Retrieval (or appropriate)".				
11.	Page 8	Describe how "reassigned RH packages listed as CH" are counted in the M-91 milestone series. Also note how RH packages shielded down to CH levels are counted in the M-91 milestone series. (As M-91-42 or M-91-43?)				
12.	Pages 8 – 10	The document excludes MLLW-01, but continues to discuss it. Confusing. Suggest making an initial mention that it is not included (e.g. page 8) then no further discussion.				
13.	Page 11, Section 2.4; 2 nd	Sentence confusing, please revise to: ". . .has occurred in Trenches 31 and 34 of burial ground 218-W-5."				

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	Paragraph; 1 st sentence					
14.	Page 12	Specifically, can alpha containing wastes be treated thermally?				
15.	Pages 15 and 16 ^{1st} bullet	In-trench treatment is only approved in Trenches 31 and 34. Please clarify this bullet as it leads the reader to think that in-trench treatment could occur in the other "in-active" trenches.				
16.	Page 15 and 19	Provide a status of In-Trench Treatment and how it will be conducted and for what types of waste streams/containers.				
17.	Page 17	Add dates and cite the reports that document the 218-E-12B RSW Treatability Study.				
18.	Page 19	Section 2.6 is a description of the regulatory requirements. Please remove the statement "A revision of the LLBG Part A Permit application was approved for treatment in-trench." This sentence is out of place and needs to be relocated to the section describing in-trench treatment.				
19.	Page 21	Central Waste Complex description: The statement "Some RH waste stored in the burial ground 218-W-3AE". Clarify how this inventory relates to the operating indoor capacity of 12,800m ³ at CWC and note when there will be a facility to store the RH waste above ground.				
20.	Page 23	T-Plant description: The statement "Approximately 10 percent of the 55-gallon drums over-packed into 85-gallon drums will not be able to be processed through the T plant PermaCons due to processing limitations including plutonium quantities, weight, sharp				

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		items, etc. Modification of WRAP is being evaluated for processing these containers." The current funding proposals for WRAP do not seem to allow for these modifications as a viable option. How will these 10% of containers be processed?				
21.	Page 24, 2 nd paragraph	Duplicative paragraph to the "Mixed Low-Level Waste Disposal Trenches."				
22.	Page 24, 3 rd Paragraph	Add in-trench treatment to this paragraph (see comment #9)				
23.	Page 28	Add language in the Retrieval of RH RSW section regarding the Engineering Studies, schedule of activities, documents and filed testing, etc. that will be required before RH retrieval actions.				
24.	Page 37	Revision 3 of the PMP noted that USDOE was evaluating on-site capability for direct-loading of certified RH-TRU waste into WIPP shipping containers/casks. Describe the result of this study and note if this capability is still being considered.				
25.	Page 37	Add when USDOE plans to evaluate alternatives to establish offsite processing capabilities for selected M-91-42 TRU(M) waste				
26.	Page 38	Describe how Hanford waste streams are approved by WIPP for acceptance for disposal. Add an appendix for a flowchart, and text.				
27.	Page 40	Add more information regarding treatment/disposition paths for RH-TRU (M).				
28.	Page 41 and Charts in	Note if the years are calendar years per the Milestones, or DOE fiscal years.				

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	Appendices Q, R, S					
29.	Page 42	Clarify the duplicate text in the M-91-44 TRU Waste section, first paragraph, and charts in Appendix R				
30.	Page 42 and 43	The inventory and funding scenario described, with all SWOC facilities placed in "min-safe" mode along with continued retrieval from 2009 to 2013 raises concerns regarding a large backlog of waste at Hanford waiting to be processed and shipped. Demonstrate that the CWC and other SWOC units have the capacity to handle such a backlog of M-91 related wastes (approximately 14,532 m ³ per Appendix S) while also accepting waste from other Hanford site missions.				
31.	Page 43	HSW-EIS cited in Section 4.3, <i>Regulatory Requirements</i> . Please update to cite the TW-WM EIS in development.				
32.	Page 44	Describe the effort needed to "Restart the SWPC Project at \$5.6M." Note if this includes the CD-1 Deliverable.				
33.	Page A-2	Add "per WAC 173-303-040 to "Acceptable Knowledge" in the Designation definition.				
34.	Pages C-6 and C-7	List References for this information				
35.	Pages C-6 and C-7	Add information for the other LLBGs including: 218-W-3AE, 218-W-4C, 218-W-5, 218-W-6, 218-C-9, 218-E-2A, 218-E-4, 218-E-8, 218-E-9, and 218-W-11.				
36.	Page C-8	Foot note 14 states "reserved". Clarify.				
37.	Pages C-9-	Add SST and DST storage Tanks and				

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	C-19	other ancillary equipment to this listing.				
38.	Pages C-9-C-19	Add references for data.				
39.	Pages C-20 and C-21	Add references for data. Also add any waste sites, equipment, burial grounds, etc. in the 400 Area, 600 Areas, and 100 Area.				
40.	Page D-2	Note in the text associated, why the forecast CH value has increased.				
41.	Page D-2	Change the ALL box from 29,570 to 35,637				
42.	Page D-2	Note in the text associated the increase from last year's ALL value (even with the decrease in MLLW-07).				
43.	Page M-3	Add the provision for "Building Blocks" to the Base Case Assumptions for FY 2009, should additional funding be awarded.				
44.	Page M-3	Add a date when all waste streams will be approved by.				
45.	Page M-3	Add an assumption on what Hanford Resources will be available to meet the obligations/assumptions listed.				
46.	Page M-3	Add an assumption regarding the operations for drum repackaging at WRAP and T-Plant.				
47.	Page M-3	Add funding needed for characterization and documentation for waste to meet WIPP WAC certification requirements.				
48.	Page N-5	Provide a basis for why all RH TRU (M) non-confirming items are assumed to be CH MLLW.				
49.	Page N-5	Note what percentage of drums or boxes require repackaging or additional processing and verification for CH TRU(M) Waste SWB (M-91-42).				

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50.	Page O-7	Add a provision that the SWPC work could begin before 2014 provided that funding becomes available.				
51.	Page P-2	Describe why the 2009 costs for IDF are high when no waste is being disposed into the unit.				
52.	Page P-2	Describe what is entailed with the facility costs for each of the SWOC units?				
53.	Page P-3	Describe why the costs have doubled from the last year's PMP costs for the M-91 project and related facilities when unconstrained funding was a basic assumption. (Adding ERDF and IDF does increase the costs, but does not double to estimate.)				
54.	Pages Q-2 to Q-5 and R-2 to R-9	Describe what the inventory in storage is due to. Note when the backlog in storage is worked-off. Also note when "treat as you go" for newly generated waste occurs.				