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Meeting Minutes Transmittal - Approved

**Unit Managers Meeting
4843 ALKALI METAL STORAGE FACILITY
2440 STEVENS CENTER, RM 2519
Richland, Washington**

**Meeting Held March 29, 1995
From 1:00 pm to 2:00 pm**

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

Ellen M. Mattlin

Ellen M. Mattlin, Unit Manager, RL

Date: 5/16/95

Not present.

Daniel L. Duncan, RCRA Program Manager, EPA Region 10

Date: _____

Greta P. Davis

Greta P. Davis, Unit Manager, Washington State Department of Ecology

Date: 5/16/95

4843 Alkali Metals Storage Facility, WHC Concurrence

Fred A. Ruck III

Fred A. Ruck III, Contractor Representative, WHC

Date: 5/16/95

Not present.

P. C. Miller, Contractor Representative, WHC

Date: _____

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
- Attachment 5 - Ecology Letter of March 6, 1995



Attachment 1

**Unit Managers Meeting
4843 ALKALI METAL STORAGE FACILITY
2440 STEVENS CENTER, RM 2519
Richland, Washington**

**Meeting Held March 29, 1995
From 1:00 pm to 2:00 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 a 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
 - 4-14-94:1 Add information to the Administrative Record
 - 9-22-94:1 Funding for FY 1995
 - 12-6-94:1 Delays of Shipping the waste
 - 3-29-95:1 Research Ecology's Clean Closure Guidance for possible use at 4843
3. Status Closure Activities
 - Status on Waste Removal
 - Status of Aerial Photographs
4. New Business
 - DQO Approach/Schedule
5. Set Next Meeting Date

Attachment 2

**Unit Managers Meeting
4843 ALKALI METAL STORAGE FACILITY
2440 STEVENS CENTER, RM 2519
Richland, Washington**

**Meeting Held March 29, 1995
From 1:00 pm to 2:00 pm**

Summary of Discussion and Commitments/Agreements**1. Approval of Past UMM Minutes**

The February 28, 1995, Unit Managers Meeting minutes were approved and signed by Ecology and Westinghouse at the March 29, 1995, Unit Managers Meeting. DOE Representative EM Mattlin, will sign the March 29, 1995, minutes upon her return April 17, 1995. At this time there are no outstanding Unit Managers Meeting minutes to be signed.

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 Alkali Metal Storage Facility (AMSF) and scheduling of the survey.

- 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. A recent radiation survey dated 6/29/94 was provided at the August 23, UMM for 4843 AMSF. 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 data quality objective (DQO) meeting will be scheduled after completion of the 4843 AMSF radiation release survey. At the March 29, 1995, Unit Managers Meeting a DQO meeting was tentatively schedule for May 23, 1995, pending completion of the radiation release survey.

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

Pending. Work is continuing on locating aerial photographs of 4843 AMSF. It has been brought to our attention that these particular negatives have two different types of numbering systems. This is slowing the process of obtaining better photographs of 4843 AMSF.

- 4-14-93:1 Add information to the Administrative Record

Pending. This action item is ongoing and cannot be completed until the unit closure has been certified. Information to be added

includes: a copy of field logbooks, a copy of analytical results, a copy of the Professional Engineer's field logbook, and a copy of the radiation survey results

- 9-22-94:1 Funding for FY 1995

Pending. Funding is available for 4843 AMSF for FY 1995. A breakdown of costs to complete work at 4843 during FY 1995 was not available at this UMM.

- 12-6-94:1 Delays of shipping the waste

Pending. This action is ongoing until waste is removed from 4843.

- 2-28-95:1 Research Debris Rule for possible use at 4843

ZC Knaus has a copy of the Debris Rule and has been researching it for possible use at 4843. AD Huckaby stated "the Debris Rule will not be used at 4843, instead Ecology's Guidance for Clean Closure should be followed".

3. Status Closure Activities

- Status on Waste Removal

WHC (ZC Knaus) reported a meeting was held between FFTF and CWC to discuss the steps necessary to ship the last remaining overpack. At this time no problems are seen in shipping the last overpack, all shipping papers are in order. No exact date has been selected for the shipment as of March 29, 1995.

- Status of Aerial Photographs

WHC (JA Seamans) is to order necessary photographs for 4843 during the month of April 1995.

4. New Business

- Introduction of Greta Davis

Greta P. Davis, will be replacing Alisa D. Huckaby, as Washington State Department of Ecology, Unit Manager for 4843 AMSF. GP Davis should be included in distribution of all pertinent information regarding 4843 AMSF.

- DQO Approach/Schedule

ZC Knaus, suggested moving forward to completing closure plan revisions and sampling/analysis plans by tentatively scheduling a DQO meeting for the entire day of May 23, 1995. He went on to add that this meeting will occur if appropriate steps can be completed before this date. The steps being: shipment of the last remaining overpack container, scheduling a radiation survey, conducting a radiation survey, and finally the results of the radiation survey. ZC Knaus added that a 'DQO kick off meeting' might be held a week or so before the actual DQO meeting (this is scheduled to follow the Unit Managers

Meeting on May 6). This 'DQO kick off meeting' would be an appropriate time to distribute any historical information to people involved in this project.

- Research Ecology's Clean Closure Guidance

AD Huckaby requested that ZC Knaus should become familiar with the "Alternate Treatment Standards for Hazardous Debris," as described in Ecology's guidance for clean closure.

- Ecology Letter of March 6, 1995

AD Huckaby requested that a copy of the Ecology Letter of March 6, 1995, be attached to the March 29, 1995, Unit Managers Meeting minutes. This letter discusses the status of closure activities at 4843 AMSF.

5. Set Next Meeting Date

The next meeting has been set for May 16, 1995, from 8:30 am to 9:30 am, 1315 West 4th, Ecology Building, Conference Rm. 8 in Kennewick, Washington.

Attachment 4

**Unit Managers Meeting
4843 ALKALI METAL STORAGE FACILITY
2440 STEVENS CENTER, RM 2519
Richland, Washington**

**Meeting Held March 29, 1994
From 1:00 pm to 2:00 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: Z.C. Knaus)
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: Z. C. Knaus)
02-18-94:1	OPEN	Arrange and schedule for the DQO meeting the 4843 AMSF. (WHC: Z. C. Knaus)
03-17-94:1	OPEN	Provide aerial photographs of the 4843 AMSF to Ecology. (WHC: Z. C. Knaus)
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: Z. C. Knaus)
09-22-94:1	OPEN	Provide information on funding available for 4843 AMSF for F.Y. 1995. Included in this will be breakdowns for specific jobs such as: DQO, NODs, Rad Survey, Waste Shipment. (WHC: Z. C. Knaus)
12-06-94:1	OPEN	Provide Ecology with answers to waste shipping questions raised at Unit Managers Meeting. The questions are as follows: 1. Why is an open trailer being used to transport the waste shipment? 2. What is the status of overpack material with regards to the required shipping papers, scheduled shipping date and finally has CWC accepted the overpack material? (WHC: Z. C. Knaus/ J. A. Seamans)
2-28-95:1	CLOSED 3-29-95	Research the Debris Rule and its possible use at 4843 for a reduction in sampling and remediation costs. (WHC: Z. C. Knaus)
3-29-95:1	New	Research Ecology's Clean Closure Guidance for its possible use at 4843. (WHC: Z. C. Knaus)

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Attachment 5

**Unit Managers Meeting
4843 ALKALI METAL STORAGE FACILITY
2440 STEVENS CENTER, RM 2519
Richland, Washington**

**Meeting Held March 29, 1994
From 1:00 pm to 2:00 pm**

TITLE - ECOLOGY LETTER OF MARCH 6, 1995

DEPARTMENT OF ECOLOGY

March 6, 1995

TO: Steve Alexander, Perimeter Area Section Manager
Dave Lundstrom, 200 Area Section Manager
Jack Donnelly, Unit Supervisor
Moses Jaraysi, Unit Supervisor
Nuclear Waste Program

FROM Alisa Huckaby, Permit Writer 
Nuclear Waste Program

SUBJECT: 4843 AMSF

LOCATION AND BACKGROUND

The 4843 Alkali Metal Storage Facility (AMSF) is located in the northwest corner of the 400 Area. Construction of the 4843 AMSF (originally known as Building #3) was completed in 1971. From 1971 to 1980, Building #3 was used primarily as a tool shed. In 1980, Building #3 was relocated to its current site and renamed Building 4722-E. From 1980 to 1986, Building 4722-E was used as construction support for the Fuels and Material Examination Facility. In 1986, Building 4722-E was renamed 4843 AMSF. 4843 AMSF began receiving dangerous and mixed alkali metal waste in April 1986. 4843 AMSF continues to be used to store dangerous and mixed alkali metal waste, including sodium and lithium, which has been generated at the Fast Flux Test Facility and at various other Hanford Site operations which used alkali metals.

PROGRESS TO DATE

Ecology is currently reviewing, for approval, the closure plan submitted for the RCRA unit entitled, "The 4843 Alkali Metal Storage Facility Closure Plan," dated June 1991 (document # DOE/RL-90-49, Revision 0). To date, the majority of waste stored at the unit has been relocated to the Central Waste Complex. One large bulky item remains at the unit, and is awaiting shipment to the Central Waste Complex.

ADMINISTRATIVE REVIEW PROCESS STATUS

Concerning the review process related to the closure plan, the original plan has not been revised and USDOE has responded to the First Notice of Deficiency (dated December 9, 1992) on February 23, 1993. Ecology responded with a Response Table on July 19, 1993. USDOE responded to Ecology's Response Table on November 4, 1993. Ecology responded to USDOE's Response Table with a Response Table on February 28, 1994.

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On March 24 and 31, 1994, issue resolution meetings were held by Ecology, USDOE, and WHC. The purpose of these meetings was to discuss and resolve the open NOD Response Table comments. Resolution was reached on 22 NOD comments with these comments being considered closed. Four comments were consolidated into another comment dealing with the same subject. This brings the total number of resolved and closed comments to 81 out of a total 88. Of the remaining 7 comments, 3 are considered to be associated directly with the Data Quality Objectives (DQO) process. The other 4 comments are more general in nature.

During the issue resolution process, it was agreed to schedule the DQO process after the radiation release survey for the unit has been performed. In addition, it was also agreed to not revise the closure plan until after the radiation release survey and the DQO process were complete (to avoid the numerous "what if" scenarios which would have to be addressed in the closure plan). It should be noted the agreement to postpone resolution of the remaining 7 comments was two-fold in nature. Not only did the postponement avoid the numerous "what if" scenarios, which would be required to be included in the closure plan, but the postponement would allow emerging MTCA regulation to be adopted, as well as Ecology's closure guidance to be issued.

FUTURE PLANS

The remaining waste will be moved out of the unit and transferred to the Central Waste Complex, possibly in March 1995.

After the waste is removed, the radiation survey (to release the entire building from radiological control requirements) will be conducted. The survey will take approximately two weeks to schedule and approximately one day to conduct. The survey could possibly be conducted in March or April 1995.

It has been agreed to schedule the DQO meetings upon completion of the 4843 AMSF radiation release survey to resolve the outstanding deficiencies of the Notice of Deficiency (NOD).

The closure plan will be revised (Revision 1) after the completion of the DQO process. It should be noted the current permit writer has formally expressed a commitment to generate only one closure plan revision prior to approval of the closure plan to avoid additional costly revisions. During the NOD resolution process, USDOE concurred with this commitment.

Upon approval of the closure plan, via modification of the Hanford Facility RCRA permit to include the plan, the plan will be implemented and the RCRA storage unit will undergo closure.

PERMITTING SCHEDULE

Currently, there is a draft permitting schedule which identifies that 4843 AMSF will be included in the Hanford Facility RCRA permit by July 1, 1996. The modification will be made by March 1, 1995. The final copy of the closure plan for "advance review" will be due by October 1, 1995. Therefore, to support this schedule, the waste must be removed from the unit, the radiological

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survey must be completed, the DQO must be completed, and the closure plan must be revised. These activities would be necessary to be completed within seven months.

TRANSITION ISSUES

There are several regulatory and technical considerations which must be addressed during the DQO process. Of particular importance are the decontamination and/or confirmation requirements. Prior to the adoption of MTCA, numerical values for RCRA closure standards and the issuance of Ecology's closure guidance, the confirmation path for the closure would have required the generation of a statistically defensible number of concrete samples. In addition, due to the lack of MTCA values for lithium and sodium, background comparisons would have been consistent with RCRA clean closure guidance. Using Ecology's closure guidance (issued last fall), a debris-like approach may be utilized whereby the concrete may be decontaminated, meeting three criteria. The debris-like approach also allows the decontamination to be conducted without requiring the follow-up confirmation sampling. During February's Unit Manager's meeting, the usage of Ecology's closure guidance debris-like application was discussed and will very likely be utilized for closure at 4843 AMSF. This application should greatly simplify the DQO process.

During the NOD resolution process, although USDOE and Ecology could not agree on radionuclide authority as it relates to mixed waste, USDOE agreed to include the data generated during the radiological survey in the closure plan. In addition, the Department of Health (DOH) has agreed to provide oversight support during the radiological survey. The intent to use the radiological survey data as part of the clean closure confirmation warrants utilization of DOH's expertise during the conductance of USDOE's radiological survey. It is recommended Ecology coordinate the survey to allow DOH's oversight support to be provided.

Transition of the closure plan to another permit writer can occur at any time. If the transition directly to another permit reviewer cannot occur soon, an evaluation of the priority of this unit's closure plan approval is recommended to be performed (i.e., should the unit's closure plan be included in the Hanford Facility RCRA permit effective July 1, 1997?). As this is not an urgent closure project (environmental insult is not occurring with a delayed closure), an out-year deferral of closure plan approval may be the preferred path.

If you have any questions or comments, please let me know.

AH:mf

cc: Joe Witczak
Administrative Record - 4843 AMSF

Distribution:

J. K. Bartz	GSSC	R3-82
R. M. Carosino	RL	A4-52
D. H. Chapin	RL	N2-36
G. P. Davis	Ecology	B5-18
D. L. Duncan	EPA	HW-106 (Seattle)
A. D. Huckaby	Ecology	B5-18
Z. C. Knaus	WHC	H6-23
P. J. Mackey	WHC	B3-15
E. M. Mattlin	RL	A5-15
P. C. Miller	WHC	N2-04
S. M. Price	WHC	H6-23
F. A. Ruck III	WHC	H6-23
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 EDMC, WHC (H6-08)]

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

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Record Center, Mail Stop HW-074

Please send comments on distribution list to Zachery C. Knaus (H6-23),
(509) 372-1597.