

0052099

Change Number M-19-91-1	Federal Facility Agreement and Consent Order Change Control Form <small>Do not use blue ink. Type or print using black ink.</small>	Date October 7, 1992
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Class of Change
 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 wastes.

Impact of Change
 The following are the current and proposed milestones:

<u>CURRENT</u>	<u>DESCRIPTION</u>	<u>DUE DATE</u>
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



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

Approvals <input checked="" type="checkbox"/> Approved <input type="checkbox"/> Disapproved <div style="display: flex; justify-content: space-between;"> <div style="width: 45%;"><i>John D. Wagoner</i></div> <div style="width: 45%; text-align: right;">10/27/92</div> </div> <hr/> <div style="display: flex; justify-content: space-between;"> <div style="width: 45%;">EPA</div> <div style="width: 45%; text-align: right;">Date</div> </div> <hr/> <div style="display: flex; justify-content: space-between;"> <div style="width: 45%;">Ecology</div> <div style="width: 45%; text-align: right;">Date</div> </div>	
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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.