



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Richland Field Office

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September 21 , 2022

22-NWP-137

Thomas K. Teynor
Deputy Assistant Manager for the River and Plateau
Richland Operations Office
United States Department of Energy
PO Box 550, MSIN: H5-20
Richland, Washington 99352

Re: M-091 Transuranic Mixed/Mixed Low-Level Waste Project Management Plan, HNF-19169,
Revision 24

Reference: Letter 22-PFD-001545, dated June 30, 2022, "M-091 Transuranic Mixed/Mixed
Low-Level Waste Project Management Plan, HNF-19169, Revision 24"

Dear Thomas K. Teynor:

The Department of Ecology (Ecology) received Revision 24 of the M-091 Transuranic Mixed/Mixed Low-Level Waste Project Management Plan from the United States Department of Energy (USDOE) for review and concurrence (Reference). Tri-Party Agreement Milestone M-091-03 requires an annual submittal of this document and approval of the document by Ecology is required by Tri-Party Agreement Milestone M-091-03Q.

Ecology appreciates the USDOE's efforts in producing this report. We note that Revision 24 includes many of the resolutions reached on past reports. The enclosed Review Comment Record provides our comments on Revision 24.

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We look forward to discussing our comments. If you have any questions, please contact me at debra.alexander@ecy.wa.gov or (509) 212-3505, or Ed Soto, Chemist, at ed.soto@ecy.wa.gov or (509) 537-6516.

Sincerely,

**Alexander, Debra
(ECY)**

Digitally signed by Alexander,
Debra (ECY)
Date: 2022.09.21 13:25:42 -07'00'

Debra Alexander
TPA Project Manager for the M-091 Milestone Series
Waste Management Project Manager
Nuclear Waste Program

eh/lb
Enclosure

cc electronic w/enc:

Laura Buelow, EPA
David Einan, EPA
Michelle Mullin, EPA
Mark French, USDOE
Sara Austin, CPCCo
Stephanie Brasher, HMIS
Scott Davis, HMIS
Michael Turner, HMIS
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Max Woods, ODOE
Debra Alexander, Ecology
Edward Holbrook, Ecology
John Price, Ecology
Stephanie Schleif, Ecology
Ed Soto, Ecology
Environmental Portal
Hanford Administrative Record (M-091)
Hanford Facility Operating Record
HAB Correspondence Control
CPCCo Correspondence Control
HMIS Correspondence Control
USDOE Correspondence Control

Review Comment Record	Washington State Department of Ecology Nuclear Waste Program	Date: August 4, 2022
		Page 1 of 2
Document Title(s)/Number(s): HNF-19169, Revision 24, "M-091 Transuranic Mixed and Mixed Low-Level Waste Project Management Plan"		
PMP Revision 24 Review		

Document Manager	Project Manager	Facility Site ID	Cleanup Site ID
Ed Soto	Deb Alexander	N/A	N/A

Item No.	Pg. # Sec. # Para./Sent.	Comment or Question	Modification Needed	Basis/Justification	U.S.D.O.E. Response	Ecology Response	Open/Close	Reviewer Initials
1	Pg. 2-1, Sect. 2, Para. 4	<p>The plan states, "<i>The large boxes not eligible for treatment and repackaging at Perma-Fix Northwest will remain at SWOC but be relocated to other dangerous waste management units for eventual treatment via the onsite capabilities to be developed for treatment of M-091 waste.</i>"</p> <p>Are the large boxes referred to the oversized boxes in storage in OSA-B? If yes, please identify the containers by unique ID number.</p> <p>Has it been determined where the capacity is available to relocate waste awaiting treatment?</p>	<p>Name the "<i>other dangerous waste management units</i>" that will treat large boxes not eligible for treatment and repackaging at Perma-Fix.</p> <p>Include the milestones or schedule for onsite treatment capabilities to be developed for M-091 waste.</p>					
2	Pg. 2-2, Sect. 2, Para. 2	<p>The plan states, "<i>It is expected that these capabilities will be suitable to prepare a portion of the future shipments to WIPP. Additional capabilities will likely be needed to complete all shipping operations needed under the M-091 Milestone series.</i>"</p> <p>In light of the additional capabilities needed to complete shipping, is there a milestone to drive this anticipated need?</p> <p>Figure 1-2 does not include additional shipping in the "Needed Capabilities" row.</p>	<p>In the plan include a schedule to determine if additional shipping capabilities are needed and include the a reference to the appropriate milestone for new shipping capabilities to be determined.</p> <p>Identify the additional capabilities and include this information in Figure 1-2.</p>					
3	Pg. 5-1, Sect. 5, Para. 3 & 4	<p>The plan states, "<i>A new capability is needed to load CH SLB2 containers into Transuranic Package Transporter Model 3 (TRUPACT-III) casks. A new capability will be needed to load RH TRUM containers into casks for shipment to WIPP.</i>"</p> <p><i>Subsequent milestones will address the selection of preferred alternatives for the design and construction of the needed capabilities to certify and ship the remaining TRUM waste to WIPP.</i>"</p>	<p>Describe the additional capabilities needed to meet the objectives stated in the Plan and prepare containers for shipment to WIPP.</p> <p>Include the milestones for new capabilities for loading containers destined for WIPP.</p> <p>Include the schedule for determining the needed capabilities to certify and ship TRUM waste to WIPP.</p>					

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4	Pg. 7-3, Sect. 7.1.1, Para. 1	<p>The plan states, “<i>Sludge has been packaged in casks and transferred to T Plant, where it will remain in storage until sludge treatment and packaging capabilities are available.</i>”</p> <p>Does the 100-K ROD Amendment account for a schedule to determine treatment and packaging capabilities needed to complete waste disposal of 105KW Basin waste?</p>	<p>Include in the plan the schedule to determine new capabilities for treatment and packaging of 105KW Basin waste. Include a reference to any milestones in relation to these capabilities.</p>					