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Department of Energy
Richland Operations Office
P.O. Box 550
Richland, Washington 99352

99-EAP-518

SEP 30 1999



Mr. Michael A. Wilson, Program Manager
Nuclear Waste Program
State of Washington
Department of Ecology
P. O. Box 47600
Olympia, Washington 98504

Dear Mr. Wilson:

COMPLETION OF HANFORD FEDERAL FACILITY AGREEMENT AND CONSENT
ORDER (TRI-PARTY AGREEMENT) MAJOR MILESTONE M-82-00

This letter notifies the State of Washington Department of Ecology (Ecology) that Tri-Party Agreement Major Milestone M-82-00, "Complete B Plant Facility Transition Phase and Initiate the Surveillance and Maintenance Phase," has been completed per the September 30, 1999, due date. With the approval from Ecology of the Part A Form 3, the Preclosure Work Plan, and the Surveillance and Maintenance Plan on September 21, 1999, all of the criteria for completing Major Milestone M-82-00 have been met.

If you have any questions, please contact me on (509) 376-6888 or Jon K. Yerxa, of my staff on, (509) 376-9628.

Sincerely,

George H. Sanders, Administrator
Hanford Tri-Party Agreement

EAP:JKY

cc: J. R. Wilkinson, CTUIR
S. V. Moore, Ecology
R. F. Stanley, Ecology
D. R. Sherwood, EPA
J. S. Hertz, FDH
A. M. Hopkins, FDH
L. J. Olguin, FDH
R. E. Piippo, FDH
M. B. Reeves, HAB
M. L. Blazek, OOE
P. Sobotta, NPT
R. Jim, YN
Ecology Library, Kennewick
Environmental Portal, LMSI
TPA Administrative Record, FDH

MEMORANDUM OF AGREEMENT
TRANSFER OF MANAGEMENT RESPONSIBILITY AT THE B PLANT FACILITY

I. PURPOSE

This Memorandum of Agreement (MOA) delineates overall management and financial responsibilities of the Office of Environmental Restoration (EM-40) and the Office of Transition and Management (EM-60) with respect to the transfer of B Plant into the Environmental Restoration Program for Surveillance and Maintenance (S&M) and final disposition.

II. SCOPE

This MOA sets forth the responsibilities, understandings, and commitments of the U.S. Department of Energy (DOE) Program Offices within EM-40 and EM-60 that are associated with the B Plant facility. The turnover of the B Plant facility has been conducted in accordance with the EM-40 Decommissioning Resource Manual (EM-0246). Outstanding transition issues and activities associated with end point criteria or other commitments have been punchlisted and are set forth in Attachment A, Post-Transition Punchlist. This MOA is limited to activities that relate to the B Plant facility, as defined in Section IV, and Tables 1 and 2, and does not cover any other Hanford Site environmental restoration activity.

III. BACKGROUND

The B Plant facility, located in the 200 East Area of the Hanford Site, had the mission from 1945 until 1956 to separate and purify plutonium. When the PUREX facility started up in 1956, the B Plant facility was shutdown. The B Plant facility underwent extensive modifications between 1961 and 1967 to re-equip the plant for ion exchange and solvent extraction processing. The mission then became the separation and isolation of cesium and strontium from fission byproducts in irradiated reactor fuels received from the PUREX facility. On October 5, 1995, the U.S. Department of Energy, Richland Operations Office (RL) directed Westinghouse Hanford Corporation to initiate transition to standby activities for the B Plant facility. The standby condition was achieved in September 1998.

IV. TRANSFER OF B PLANT

The entire B Plant facility is to be transferred per this MOA. EM-60 hereby transfers the entire B Plant facility to EM-40 and EM-40 accepts such transfer. The B Plant facility covered by this MOA includes (i) the main 221-B canyon building and compound, (ii) the 271-B administrative building, (iii) all ancillary buildings and waste sites listed in Tables 1 and 2, and (iv) all equipment associated with the foregoing facilities. Figure 1 is provided for orientation purposes only.

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V. ROLES AND RESPONSIBILITIES

General

Final facility deactivation and placement into S&M mode was accomplished with the acceptance of all end point criteria as documented in HNF-SD-WM-TPP-054, Rev. 2C, "B Plant End Point Document."

Upon approval of this MOA, the RL Contracting Officer is authorized to issue a letter of direction transferring responsibility for the B Plant facility from Fluor Daniel Hanford, Inc. (FDH) to Bechtel Hanford Inc. (BHI). The B Plant Surveillance and Maintenance Plan (S&M Plan), Safety Analysis Report (SAR) and Safety Evaluation Report (SER) implementation requirements and associated timelines will be set forth in the letter of direction transferring the facility to BHI for S&M. The S&M Plan, DOE/RL-99-24, Rev. 0 describes the current facility conditions and planned S&M activities to ensure the facility is maintained in a cost effective and environmentally secure configuration until final disposition is achieved. Parties intend to transfer all operational responsibilities for the B-plant facility except for those items specifically retained and identified herein. In addition, all of the responsibilities assigned below will take effect as specified in Section VI, below.

Nothing in this MOA shall be construed to modify Contract Nos. DE-AC06-96RL13200 (including Subcontract No. 80232764-9-K002) or DE-AC06-93RL12367; and to the extent any provision of this MOA is inconsistent with such contracts, the provisions of such contracts shall prevail.

Office of Environmental Restoration (EM-40)

EM-40 will provide funding for the cost associated with the facility S&M program immediately upon approval of this MOA and lasting through the duration of the program.

EM-40 will assume assigned responsibilities as delineated in the Post-Transition Punchlist (Attachment A). Completion of these items will not delay final deactivation or transfer of the facility to EM-40.

EM-40 will provide funding after turnover for all direct building and project activities, including Decontamination and Decommissioning (D&D), waste management, and compliance with all applicable regulatory requirements and interfaces, with the exception of the items specifically retained by EM-60 (see Attachment A for details).

EM-40 will provide programmatic direction on D&D methods, planning, and facility implementation.

EM-40 will be programmatically responsible for the building and operations therein. This will include responsibility for occurrence reporting, DOE Order compliance, and

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compliance with all regulatory requirements except for those items that remain the responsibility of EM-60 until completed.

EM-40 will be programmatically responsible for the ownership of the B Plant buildings, structures, and waste sites listed in Tables 1 and 2.

EM -40 will continue to coordinate with the Office of River Protection for the final isolation of lines 833/8618 and 834/8615 at the 244-AR vault

Office of Facility Transition (EM-60)

EM-60 will assume assigned responsibilities as delineated in the Post-Transition Punchlist (Attachment A). Completion of these items will not delay transfer of the facility to EM-40.

VI. FINANCIAL

Funding will be provided by either EM-40 or EM-60 as delineated in Section V, "Roles and Responsibilities." EM-60 will be financially responsible for all Post-Transition Punchlist items as assigned in Attachment A.

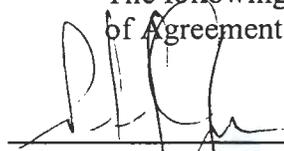
VII. TIMING

The B Plant facility will be transferred from EM-60 to EM-40 upon final approval of this MOA. Responsibility for the B Plant facility and associated structures and waste sites shall transfer to the S&M contractor, BHI, upon written direction from the RL Contracting Officer. The B Plant S&M Plan, SAR, and SER implementation requirements and associated timelines will be set forth in the letter of direction transferring the facility for S&M to BHI.

EM-60 and its contractors, FDH and B&W Hanford Company (BWHC), will no longer retain any responsibility for the B Plant facility after the applicable Post-Transition Punchlist (Attachment A) items have been completed.

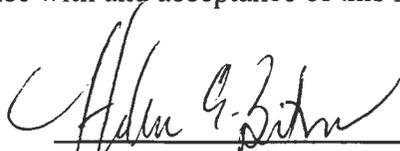
VIII. APPROVAL

The following signatures indicate concurrence with and acceptance of this Memorandum of Agreement.



Pete M. Knollmeyer
Assistant Manager for
Facility Transition

9/26/99
Date



Helen E. Bilson
Acting Assistant Manager for
Environmental Restoration

9/28/95
Date

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**Table 1
B Plant Facility Buildings and Structures (Page 1 of 2)**

B-Plant Facility Buildings and Structures to be transferred to EM-40	
Building ID	Building Description/Components
207-BA	CBC Sampling Building
211-B	Chemical Tank Farm Area
211-BB	MCC Building for 211-B Area
212-B	Cask Transfer Building
217-B	Demineralized Water Building
221-B	B-Plant Canyon Building <ul style="list-style-type: none"> • Canyon and Process Cells • Electrical Gallery • Pipe Gallery • Operating Gallery • SWP Change Room • Railroad Tunnel
221-BA	15-inch Cooling Water Monitor Building
221-BB	Condensate Building for LLW Concentrator
221-BC	SWP Change Building
221-BD	Laundry Storage Building
221-BF	BCP Diversion Pit Building
221-BG	24-inch Cooling Water Monitor Building
221-BK	Canyon Exhaust Instrumentation Building and Canyon Exhaust System <ul style="list-style-type: none"> • Duct • Filters • Fans
222-B	Office Building
271-B	B-Plant Support Building <ul style="list-style-type: none"> • Basement • First Floor • Second Floor • Third Floor
271-BA	Laundry Storage Building
2711-B	Breathing Air Compressor Building
2715-B	Paint and Oil Storage Building
2716-B	Storage Building – RR Cut
276-B	Paint Shop
276-BA	ISO Tank Area
291-B	Exhaust Fans Control/Turbine Building
291-BA	Exhaust Air Sample Building
291-BB	Instrument Building – A and B Filters
291-BC	C Filter Building
291-BD	C Filter Instrument Building

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**Table 1
B Plant Facility Buildings and Structures (Page 2 of 2)**

B-Plant Facility Building and Structures to be transferred to EM-40	
Building ID	Building Description/Components
291-BF	D Filter Instrument Building
291-BG	E Filter Instrument Building
291-BJ	F Filter Instrument Building
291-BK	E Filter Monitoring Building
292-B	Stack Monitoring Building
291-B-1	Retired Canyon Ventilation Stack
296-B-1	Canyon Ventilation Stack
296-B-2	Filter Vault Passive Vent Stack
296-B-5	Retired 221-BB Stack
296-B-13	Retired 221-BF Stack
296-B-21	Retired Pipe Gallery Exhauster
296-B-22	Retired Pipe Gallery Exhauster
296-B-23	Retired Pipe Gallery Exhauster
296-B-24	Retired Pipe Gallery Exhauster
296-B-25	Retired Pipe Gallery Exhauster
296-B-26	Retired Pipe Gallery Exhauster
296-B-27	Retired Pipe Gallery Exhauster
C8-S49	Main B-Plant Substation (221-B/271-B)
C8-S77	B-Plant 291-B Area Substation
A-F Filters	A-F Filter Vaults
Yard	Total Area Inside the Fence

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The following table provides identification and describes the type of Waste Sites associated with the B Plant facility that will be transferred to the EM-40 contractor, BHI, upon direction of the contracting officer following approval of this MOA.

**Table 2
Waste Sites (Page 1 of 2)**

B-Plant Waste Sites to be transferred to BHI.	
200-E-6	Septic Tank
200-E-16	LLW Concentrator (In Canyon)
200-E-25	Miscellaneous Stream # 659
200-E-28	221-B Steam Condensate Release
200-E-30	291-B Sand Filter
200-E-55	Miscellaneous Stream # 322
200-E-88	Miscellaneous Stream # 3
200-E-89	Miscellaneous Stream # 4
200-E-90	Miscellaneous Stream # 5
200-E-91	Miscellaneous Stream # 6
200-E-92	Miscellaneous Stream # 7
200-E-93	Miscellaneous Stream # 8
200-E-94	Miscellaneous Stream # 9
200-E-95	Miscellaneous Stream # 308
200-E-97	Miscellaneous Stream # 470
200-E-98	Miscellaneous Stream # 490
200-E-99	Miscellaneous Stream # 570/#1 (Duplicate)
200-E-100	Miscellaneous Stream # 571/#2 (Duplicate)
207-B	Cooling Water Retention Basin
216-B-4	Dry Well
216-B-13	Crib
216-B-59	Trench
216-B-59B	Retention Basin
216-B-64	Retention Basin
217-B NU	217-B Building Elementary Neutralization Unit
221-B-26-1	221-B-TK-26-1 Radioactive Organic Waste Solvent Tank 1
221-B-27-2	Tank Tk-27-2
221-B-27-3	221-B-TK-27-3 Radioactive Organic Solvent Tank 2
221-B-27-4	221-B-TK-27-4 Radioactive Organic Waste Solvent Tank 3
221-B-28-3	221-B-TK-28-3 Radioactive Organic Solvent Tank 4
221-B-28-4	221-B-TK-28-4 Radioactive Organic Solvent Tank 5
221-B-29-4	221-B-TK-29-4 Radioactive Organic Solvent Tank 7
221-B-30-3	221-B-TK-30-3 Radioactive Organic Solvent Tank 6
221-B NANU	221-B Nitric Acid Neutralization Unit
221-B SDT	221-B Plant Settle and Secant Tank
221-B SHNU	221-B Sodium Hydroxide Elementary Neutralization Unit
221-B-WS-1	B-Plant Storage
221-B-WS-2	B-Plant Waste Pile
270-E-1	Condensate Collection Tank
2607-E3	Septic Tank
2607-E4	Septic Tank
B-Plant Filter	F-34-4 Filter

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**Table 2
Waste Sites (Page 2 of 2)**

B Plant Unplanned Release Sites transferred to BHI	
Unplanned Release Site	<ul style="list-style-type: none">• UPR-200-E-1• UPR-200-E-2• UPR-200-E-3• UPR-200-E-7• UPR-200-E-32• UPR-200-E-41• UPR-200-E-44• UPR-200-E-52• UPR-200-E-64• UPR-200-E-69• UPR-200-E-80• UPR-200-E-85• UPR-200-E-90• UPR-200-E-95• UPR-200-E-103• UPR-200-E-112• UPR-200-E-140

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Attachment A

Post-Transition Punchlist

Conditions in this list represent transition issues and activities that have been punchlisted to allow closure of the associated end point criteria or to track outstanding EM-60 and EM-40 commitments associated with the deactivation and transfer of the B Plant facility.

1. Issue:

Property Records Transfer

Resolution/Scope:

The scope of this punchlist item is the completion and acknowledgement of the documentation required to show physical transfer of all remaining B Plant property including buildings, structures and equipment to the EM-40 contractor, BHI. Upon approval of this MOA, an Inter-Contractor-Transfer-Order (ICTO) will be approved signifying property transfer. RL Property System records will be updated accordingly.

Path Forward:

Perform final review of ICTOs and obtain appropriate level of signatures.

Cost of work scope:	LOE
Work to be completed by:	BWHC/BHI
Work to be funded by:	EM-60 & EM-40
Estimated date of completion:	10/29/99

2. Issue:

Waste Sites Transfer

Resolution/Scope:

The scope of this punchlist item is to document transfer of ownership and responsibility for the cribs, ditches, and unplanned release sites identified in Table 2 that are associated with the B Plant facility from the EM-60 contractor to the EM-40 contractor using this MOA. Contractor personnel have previously agreed upon the scope and field-verified conditions as acceptable to perform this transfer. Information files will be transferred upon approval of the MOA.

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Path Forward:

Place the applicable information files in the end point turnover files upon approval of this MOA.

Cost of work scope:	LOE
Work to be completed by:	BWHC/BHI
Work to be funded by:	EM-60 & EM-40
Estimated date of completion:	MOA Approval

3. Issue:

Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) and regulatory commitments.

Resolution/Scope:

The scope of this punchlist item is to ensure the remaining Tri-Party Agreement or regulatory commitments are completed. These commitments consist of:

- 1) Updating the Hanford Air Operating Permit (AOP) Application and provide current and accurate information and comments on the draft permit to reflect the B Plant facility in its deactivated state.

Path Forward:

Update and review the Tables in the Draft AOP that apply to B Plant to ensure it reflects the current status of the facility.

Cost of work scope:	TBD
Work to be completed by:	BWHC/BHI
Work to be funded by:	EM-60 & EM-40
Estimated date of completion:	11/30/99

Resolution/Scope:

- 2) Complete and submit the Dangerous Waste Part A Permit Application, Form 3 to the State of Washington, Department of Ecology.

Path Forward:

The Part A application will be revised to show BHI as co-operator and BHI will submit the Part A application to RL for transmittal to the Washington State Department of Ecology.

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Cost of work scope:	LOE
Work to be done by:	BHI
Work to be funded by:	EM-40
Estimated date of completion:	Upon BHI's receipt of the Letter of Direction from RL.

4. Issue:

Facility Roof Repairs

Resolution/Scope:

The scope of this punchlist item is the repair of the facility roof coverings to prevent water intrusion during the post deactivation S&M period.

The roof covering on the 221-B, 212-B, 271-B, and 222-B Buildings will be repaired in order to eliminate water infiltration. Repair of the 221-B, 212-B, 271-B, and 222-B Buildings will be accomplished by either replacing the existing covering or removing the covering in order to allow the entrapped water to evaporate and then installing the required underlayment and cover. Two independent engineering evaluations performed by both on- and off-site personnel have confirmed this replacement activity is required in order to meet the requirements for a watertight roof as specified in the End Point Criteria document.

Path Forward:

EM-60 to provide funding to initiate and complete roof covering replacement or repair on the 221-B, 212-B, 271-B, and 222-B Buildings. This MOA documents the agreement that EM-60 shall transfer the funding for the 221-B, 212-B, 271-B, and 222-B roof membrane replacements or repairs prior to the unacceptable degradation (as determined by roof assessments performed by a qualified structural engineer).

Funding will be provided in FY 2000 as defined in the FY 1999 Facility Stabilization Projects (EM-60) Multi-Year Work Plan (MYWP).

Cost of work scope:	\$ 1.951m
Work to be done by:	BHI
Work to be funded by:	EM-60
Estimated date of completion:	TBD by EM-40 and EM-60

5. Issue:

Turnover of regulatory files, operating records, air emission records, end point criteria documentation, and essential drawings.

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Resolution/Scope:

Physical transfer of the regulatory files, operating records, air emission records, end point turnover files and essential drawings, including hard copies and electronic databases, from EM-60 to EM-40 contractor personnel.

Path Forward:

BWHC to prepare a letter transmitting the regulatory files, operating records, air emission records, end point turnover files and essential drawings, including applicable databases to BHI.

Cost of work scope:	LOE
Work to be completed by:	BWHC
Work to be funded by:	EM-60
Estimated date of completion:	10/29/99

6. Issue:

Annual "Draw Test" for Passive Vent System

Resolution/Scope:

The scope of this punchlist item is the preparation and demonstration of a viable methodology for conducting the annual "draw test". This will include developing the criteria for determining a successful test.

This requirement has been established as an Administrative Control (AC) in the Safety Evaluation Report (SER) and has not been addressed in any previous documentation or requirements. In order to comply with the intent of the SER and meet the AC's for the passive vent system, a technical instruction needs to be developed to describe how to accomplish the AC. The instruction will need to include the criteria for designating the flow test as a success or failure. As this has not been done before, the technical instruction will need to be field validated.

Path Forward:

EM-60 will develop a technical instruction for conducting the annual 'draw test' on the passive vent system associated with the retired filters that meets the requirements of the AC established in the B Plant SER. This will include the criteria for success and failure of the proposed testing. The technical instruction will be field validated by EM-60. Only after the field validation, will the technical instruction be accepted by EM-40 and be converted to an S&M procedure. (EM-40 will be responsible for converting the validated procedure into their format for continued S&M.)

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If the flow path is determined to be blocked or the procedure is determined to be inadequate during the field validation EM-60 will continue to resolve the issue until the system meets the AC requirements in the SER. The system will have recently passed the flow test requirements for WAC 246-247 and 40 CFR 61-93.

Cost of work scope:	TBD
Work to be done by:	BWHC
Work to be funded by:	EM-60
Estimated date of completion	12/31/99

7. Issue:

W-059 Ventilation Duct Repairs

Resolution/Scope:

The scope of this punch list item is the repair of the ventilation ductwork on the W-059 ventilation system at B Plant.

The ventilation ductwork from the fans to the stack is experiencing extreme wear over the short time it has been operational. The ductwork has significant cracking along the ductwork and especially near welded segments. The root cause of the system component failure needs to be determined and the system returned to an operating condition acceptable to EM-40.

Path Forward:

EM-60 will continue to work on developing the root cause of the system component failure and keep EM-40 and their contractors apprised of the determinations. When the root cause is determined, the system will be repaired/replaced by EM-60 to a condition acceptable to EM-40. The system will be operational by the end of the first quarter in FY00.

Cost of work scope:	TBD
Work to be done by:	BWHC
Work to be funded by:	EM-60
Estimated date of completion	12/31/99

8. Issue:

W-059 Filter Replacement

Resolution/Scope:

The filters need to be replaced on both W-059 filter trains. The original purpose of changing out the filters was to verify the procedure for the filter change and gain

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information for the set points on the radiation detection instrumentation on the ventilation system. This work was to be completed on one of the filter trains and the information gathered would be used to determine what was required for the second filter train. During the recent attempt to change the filters in the first train, dose readings significantly above the established controls were encountered. The instrument readings on this filter were at 40mrem/hr and indicate significant loading on the filter train. The second filter train is currently reading 35mrem/hr. This appears to indicate significant loading is present on the second filter train. The second filter train needs to have its' filters replaced and the data from the two filter banks will be utilized to adjust the set points for the radiation sensors to determine when filter change outs should occur. This is required as the existing design basis for the set points (50mrem/hr) is invalid as shown by the recent attempt to replace the filters.

Path Forward:

EM-60 will complete the replacement of filters in both filter trains in the W-059 system. The radiation loading data from the filters will be collected and used to adjust the current system set points in the procedures to determine when filter change replacements should occur.

Cost of work scope:	TBD	(FY-00 WESF funds may be used)
Work to be done by:	BWHC	
Work to be funded by:	EM-60	
Estimated date of completion	12/31/99	

9. Issue:

Reporting Requirements

Resolution/Scope

Compliance with nuclear safety and environmental commitments and requirements, including applicable reporting of occurrences/exceedances, associated with EM-60 work on the W-059 vent duct repair, the W-059 filter bank replacement, and the passive vent system will remain the responsibility of EM-60 until the work is completed and accepted by EM-40. EM-40 will not audit this work; however, EM-60 will immediately notify EM-40 of any occurrences/exceedances that may be reportable.

Path Forward:

EM-60 will remain responsible and close out all issues associated with the vent duct repair, the filter replacements, and the passive vent system. EM-40 will validate closure at the completion of the work scope.

Cost of work scope:	TBD
Work to be done by:	BWHC

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Work to be funded by:	EM-60
Estimated date of completion	12/31/99