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[0064645H]

August 28, 2018, Meeting Minutes  
Plutonium Finishing Plant (PFP)  
Project Managers Meeting  
2420 Stevens Center, Room 408

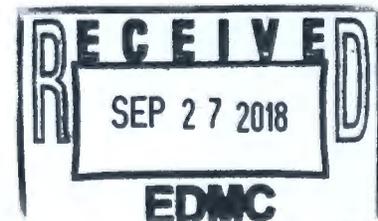
Date: 09/25/2018

Project Manager Representative, DOE-RL

Date: 9/25/18

Project Manager Representative, Ecology

Administrative Record	H6-08
S. G. Austin, CHPRC	A6-01
N. S. Cruz, CHPRC	A6-01
W. G. Cox, CHPRC	T5-60
M. T. Hughey, CHPRC	T4-53
G. R. Konzek, RL	A6-38
E. Laija, EPA	A3-46
S. N. Schleif, Ecology	H0-57
T. K. Teynor, RL	A6-38
K. A. Wooley, CHPRC	T5-60



cross ref: 1248887

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## Administrative Topics

Signing of the Minutes from the June 27, 2018 Project Manager Meeting was completed on August 15, 2018 and submitted for inclusion to the Administrative Record.

Minutes from the July 24, 2018 Project Manager Meeting were approved and signed and will be uploaded to the Administrative Record.

## Action Status

Action	Actionee	Status
Provide information to the regulators on funding impacts to other projects and milestones	RL	Closed for 2018, 2019 budget impacts still open.
Provide a schedule for installation, the number, the types, and locations for the new PFP monitoring equipment	RL	To complete the action attach map to these minutes.
Prepare agreement for use of temporary exhausters for 234-5Z remaining demolition	RL	Agreement prepared and to be provided to Ecology, EPA and DOH via email
Provide status of the 21 stabilization and risk reduction activities during PMM	RL	Three work activities from the list remain open. Will close at the next PMM.
Provide results of the non-destructive assay of exhausters final HEPA filters used during 236Z demolition	RL	Work package is being developed, and NDA is scheduled to be completed in October, 2018.
Provide work instructions, RWP and AMW for debris load out work package	RL	Closed (Email from DOE to EPA with cc: to Ecology and DOH dated June 6, 2018.)
Provide status of open pre-start corrective actions	RL	Pre-start corrective actions associated with PFP Causal Analysis (condition report CR-2018-0022) and HQ EM-3.112 Site Visit (condition report CR-2018-0378) are complete. There are new pre-start corrective actions to complete resulting from the Management Assessment.

## Status of PFP Waste Storage in the North Outside Storage Area (NOSA)

As of August 23, 2018 there were 28 1800TL container(s) of waste and 7 empty 1800 TL containers stored at the NOSA.

## PFP Milestone Status (RL/CHPRC).

- M-083-00A, *Complete PFP Facility transition & selected disposition activities. Completion of this major milestone includes the following key elements: 1) completion of all activities necessary to achieve end point criteria established through Milestone M-83-20 for placing the PFP facility in a safe and stable S&M mode, 2) completion of all activities described in the approved M-83 series interim milestones and target date; and 3) completion of the balance of PFP selected disposition activities pursuant to the final action memoranda and work plans. Also see "description/justification" contained in change form M-83-01-03. 9/30/2017 (Missed)*

Tom Teynor (RL) stated the milestone has been missed as previously discussed in other PMMs and that the project is still performing recovery actions. Budget impact for 2019 will be less than anticipated due to carry over funding for the PFP Project.

## Project Progress, Issues, Concerns, and Challenges

- **Status of open actions from 21 stabilization and risk reduction activities**  
Kelly Wooley (CHPRC) provided status of the open activities of the 21 stabilization and risk reduction activities. There are three activities left to complete (updated table attached).
- **Status of pre-start corrective actions**  
Kelly Wooley (CHPRC) provided status of the open pre-start corrective actions. The remaining pre-start corrective actions resulting from the causal analysis and the Headquarters Environmental Management visit have been closed. New pre-start corrective actions have been added as a result of the Management Assessment and the DOE-RL surveillance report on the Management Assessment (updated table attached).
- **Status of open actions from other meetings**  
Kelly Wooley (CHPRC) lead the discussion for the list of actions and each person listed as responsible for that action provided a status (updated list attached).
- **Changes to planned or actual work that departs from Demolition Resumption Plan**  
Kelly Wooley (CHPRC) stated there have been no changes to any planned work that affects the requirements of the Demolition Resumption Plan.

## Ecology Topics.

- **Change to schedule in Sample and Analysis Plan (SAP) DOE/EL-2016-25**  
Glenn Konzek (RL) stated work had started on this but has slipped due to other priorities. An action was agreed to that a draft of changes to the SAP would be provided at the next PMM.
- **Department of Health questions regarding wind speed measurement**  
Glenn Konzek (RL) and Kelly Wooley (CHPRC) responded to the question about what happens when meteorological stations or entire network is out. In the case of station unavailability, data from other stations can be used. When the whole network is out, the Project has 15 mph wind socks and calibrated hand held anemometers to determine wind speeds. Kelly Wooley (CHPRC) added that work is not started or is shut down prior to reaching the 15 mph limit based on forecasted wind speeds. Mr. Konzek stated that the question as to the location of station 40 instrumentation is being researched and information will be provided at the next Project Manager Meeting.
- **EPA/DOH questions on RWP for debris load out work**  
Todd Southerland (CHPRC) responded to the three questions from the EPA.
  1. The resuspension value used is based on planning form directions for determining which value to use. In this case, the resuspension value of  $1 \times 10^{-6}$  is appropriate for the tools being used.
  2. Mr. Southerland stated that Jim McAuley's (EPA) interpretation of PPE use is correct. Workers are allowed to wear a modified double set of PPE. If the RWP action level (1,600 dpm) is reached, work is paused and either decontamination or fixative application is initiated to stabilize the item or area. If contamination is greater than 100,000 dpm workers must be in full double sets of PPE.
  3. Mr. McAuley stated he believed there is an opportunity for conservatism by adding a work pause level between the action level of 1,600 dpm and prior to reaching the void limit of 2 million dpm. Mr. Southerland stated that the 1,600 dpm is the work pause level and is more conservative than using a higher number. Mr. McAuley indicated that while the current RWP Void and Pauses technically keep the workers in the HCA/CA/ARA within the protection level of their PPE and administrative level of the ARA, a pause between 100,000 to 2,000,000dpm/100cm<sup>2</sup> for a

management review and a worker briefing could add a necessary level of conservatism, particularly for how flighty the contamination is, for protecting the workers in the RBA or adjacent areas. Mr. McAuley recognizes he was not at the ALARA planning and will add this as a comment through Mr. Einan.

Mr. McAuley was satisfied that the information provided answered the first two questions.

- **EPA/DOH questions on Air Dispersion Model for 234-5Z**

The meeting was stopped prior to this discussion due to the timing of another meeting that Stephanie Schleif (Ecology) and John Martell (DOH) needed to attend.

Meeting Summary

- Two Tri-Party Agreement change notices (TPA-CN-0780 and TPA-CN-0817) will be attached to these minutes in accordance with Section 9.3 of the Tri-Party Agreement Action Plan.
- New Actions:
  1. RL provide a draft changes to DOE/RL-2016-25

Next Meeting Date and Location:

Next meeting will be on Tuesday September 25, 2018 to be held in 2420 Stevens Center, room 408 at 8:30 a.m. (meeting to be scheduled for a longer period to allow discussion of air dispersion model).

**Attachments:**

Map of current PFP monitoring equipment location and type.

Status of 21 Stabilization and Risk Deduction Activities.

Open pre-start corrective Actions.

Status of open action items from other meetings to track in PMM

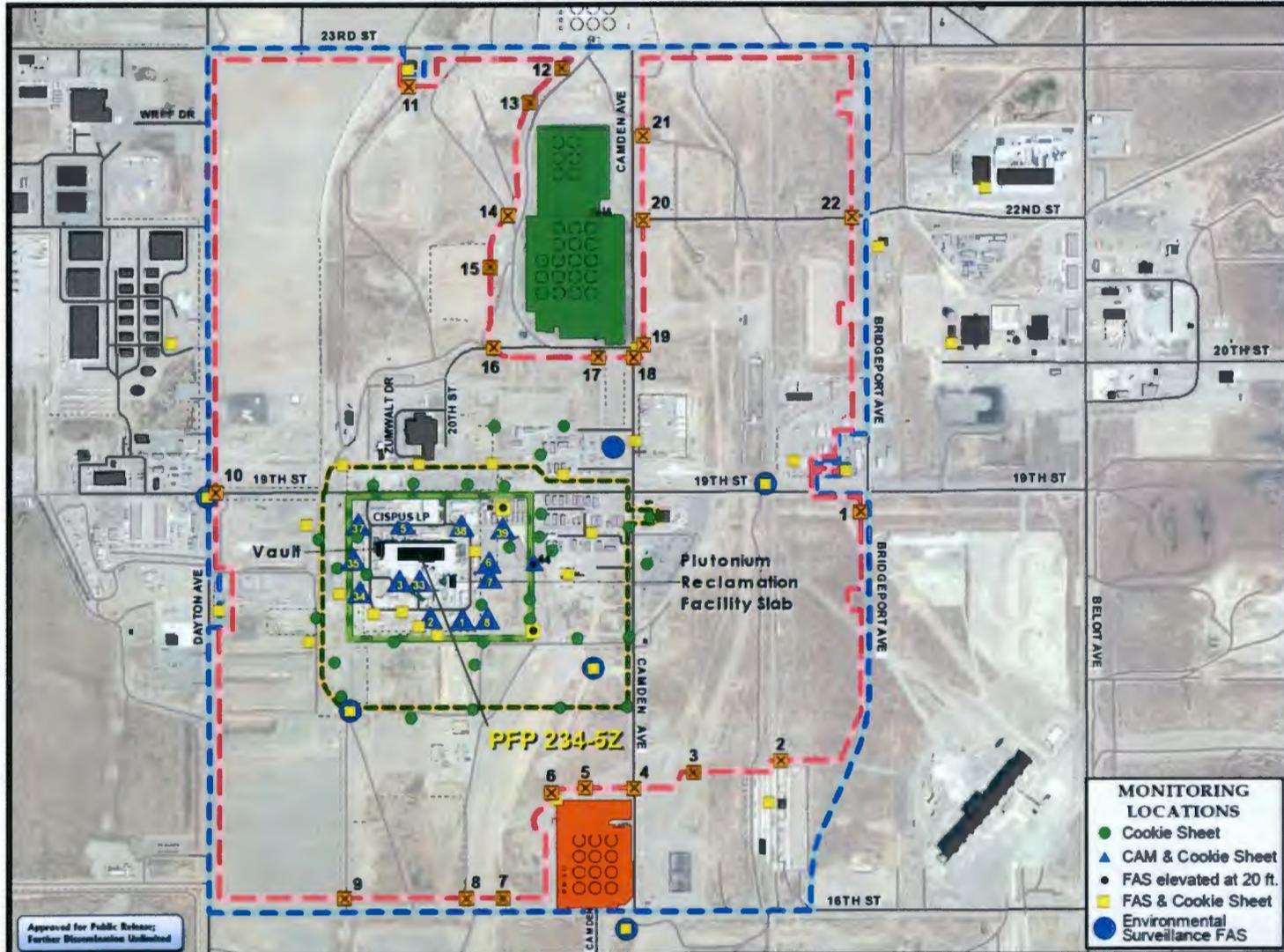
Department of Health Email RE: Exhauster & Dose Conversion Doc not setting precedent for future projects

TPA Change Notice TPA-CN-0780

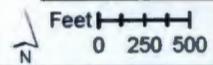
TPA Change Notice TPA-CN-0817

# Attachment 1 Map of Current PFP Monitoring Equipment

## PFP MONITORING, BOUNDARY AND GATE LOCATIONS (UPDATED 9/7/2018)



Approved for Public Release;  
Further Distribution Unlimited



- Gate Locations
- Access Control Boundary Implemented 5/30/18
- RBA Boundary Implemented 5/30/18
- HCA/ARA: PLANNED
- CA/ARA: PLANNED
- WRPS Managed RBA
- WRPS Managed CA
- Building
- Trailer
- Structure
- Fence

- MONITORING LOCATIONS**
- Cookie Sheet
  - CAM & Cookie Sheet
  - FAS elevated at 20 ft.
  - FAS & Cookie Sheet
  - Environmental Surveillance FAS

Map As of 1:19:38 PM 9/10/2018  
MSA Central Mapping Services  
(Reference Map)

180711\_AccessControlAndRBABoundaries\_WithGatesAndMonitoringLocations\_11x85\_Rev4

**Attachment 2 Status of 21 Stabilization and Risk Deduction Activities**

#	Activity	Communication DOE/Regulators
1	Shipping previously containerized waste to CWC. (Approximately 20-TRU TL-1800s, 5-TRU SWBs, 10-TRU SLB2s, 10-LLW Boxes, 35-TRU Drums, 55-LLW Drums, 45-Hazardous Waste Drums, 5-Universal Waste Drums)	Shipments are ongoing
2	Placing covers over super sacs (containing PRF strongbacks and gallery GB sections) to ensure container integrity pending waste load out. (Approximately 25-IP1 Bags with PRF waste items, 20-Bags with PRF rubble)	Completed 7/19/2018
3	NDA of loaded waste containers (with specific focus on the 1800 TLs noted in item #1 above)	*
4	Perform visual inspection & repack of 5 loaded waste drums	Ready to start
5	Perform inspections, surveys, and shipment to ERDF of previously loaded RO/RO containers	Work is ongoing
6	Perform hydrant tie in to location adjacent to Dayton & 19 <sup>th</sup> to support water source outside of new proposed CA supplying PFP water loop	Completed 4/23/2018
6a.	Includes laying water line in and outside of current RBA/PFP work control zone	Completed 4/23/2018
6b.	Tie into current water loop replacing connection to current hydrant	Completed 4/23/2018
6c.	Excavation of road crossings under 19 <sup>th</sup> Street and Dayton Avenue are located in radiological clean areas outside the PFP access control boundary	Completed 4/23/2018
7	Isolation of water connections inside the PFP boundary and facilities	*
8	Define and implement access control updates in conjunction with MSA to support sewer maintenance activities and security surveillances. MSA is evaluating the possibility of sealing the manhole cover. Activities will not involve excavation inside of radiological posted Contamination Areas	Completed 3/15/2018
9	Working with MSA coordinate Electrical Utilities configuration in the proposed PFP boundaries to minimize impacts to 200W power distribution. Activities will not involve excavation inside of radiological posted Contamination Areas	Completed 3/15/2018
10	Implementation of additional expanded boundary monitoring equipment and associated power supply	*
11	Relocation of personal items from the PFP trailers	Completed 6/26/2018
12	Move clean equipment out of the work zones (NDA, chemicals, supplies)	*
13	Installation of back-up generators and battery change outs for the communications trailers	Completed 3/23/2018
14	Update Primary and alternate staging areas designations and postings	Completed 4/26/2018
15	Update Primary and alternate ICP designations, postings, and materials	Completed 6/5/2018
16	Update emergency response documentation to support the increased boundaries	Completed 4/26/2018
17	Perform baseline surveys of areas to be included in new work control zones	*
18	Establishment of warming/cooling areas/tents/buildings at exit/release points	*
19	Protect/cover/wrap equipment that must remain in the new boundary to support future use	*
20	Remove or relocate approximately 30 empty ERDF containers	Completed 4/26/2018
21	Perform Super Sack loading – Status 20 of 20 TRU Complete	Completed 6/18/2018

\* Completed – Will remain open due to other authorized activities still on going

**Attachment 3 Open Pre-Start Corrective Actions**

Source	CR Number	Action #	Action
PFM Causal Analysis	CR-2018-0022	CA-09	Implement the new radiological boundary for stabilization. <b>CLOSED 8/4/2018</b>
PFM Causal Analysis	CR-2018-0022	CA-10	NTS - Verify the new radiological boundary based on the revised ADM. Refine and adjust as required. <b>CLOSED 7/31/2018</b>
PFM Causal Analysis	CR-2018-0022	CA-11	NTS - Revise the Air Dispersion Model for remaining Material At Risk and facility configuration for the remaining scope to complete slab on grade, taking into account larger particles being swept in wind driven events. <b>CLOSED 7/12/2018</b>
PFM Causal Analysis	CR-2018-0022	CA-18	NTS - Incorporate newly developed methods and controls into the applicable work packages to address CA-02 and CA-03. Provide specificity to controls to allow consistent field implementation. <b>CLOSED 8/3/2018</b>
HQ EM-3.112 Site Visit (Jan)	CR-2018-0378	CA-02	Verify that if radiological monitoring (i.e. DAC-hr tracking for demolition rate) is utilized in the new size-reducing/load-out work package, that it is addressed in the AMW and provides a tracking mechanism. <b>CLOSED 7/17/2018</b>
HQ EM-3.112 Site Visit (Jan)	CR-2018-0378	CA-03	Verify that if radiological monitoring (i.e. DAC-hr tracking for demolition rate) is utilized in the new demolition work package, that it is addressed in the AMW and provides a tracking mechanism. Revise as appropriate. <b>CLOSED 8/3/2018</b>
Management Assessment Report	CR-2018-2257	CA-03	Conduct an Oral Board with the affected employee.
DOE/RL Report	CR-2018-2271	CA-01 CA-02 CA-04	Revise 18-007-SOI_R0 to reflect the new requirement for surveying items out at the RBA. Brief PFM FWSs on the revised SOI so they can provide the information of the changes to all PFM radiological workers. Issue a Read and Sign for all PFM exempt radiological workers to review 18-007-SOI-R1.
DOE/RL Report	CR-2018-2272	CA-01	Conduct a satisfactory operational drill to demonstrate expected response to emergent condition.

#### Attachment 4 Action Items From Other Meetings to Track in PMM

- Minutes for May 29, 2018 Air Dispersion Model Q&A – Cox/Konzek **Not completed yet due to competing priorities.**
- Provide RL with an email about WDOH not setting precedent for temporary exhausters – Schleif (on June 4, 2018, Schleif emailed Teynor two WDOH issues with the RAWP and ADM including clarifications on resolution). On June 5, 2018, Schleif clarified that another email will be forwarded for the minutes). **CLOSED (email from Ecology to RL on 8/19/2018)**
- Per July 20, 2018 Alex Smith email - Notify Ecology when MA prestarts are completed – Teynor **Three Management Assessment pre-starts were added to the Open Pre-Start Corrective Actions table (Attachment 3) for tracking.**
- From May 21, 2018 email) Notify Ecology prior to the start of each phase of low risk work at PFP (234-5Z rubble pile, demolition of 234-5Z building and duct) – Teynor
- Provide Final NARAC report when issued – Teynor **A status will be sent via Email from RL.**
- Pre-meeting for 236-Z ADM Revision 1 (including Summary of Changes and Key Assumptions/Control – Setup for August 22, 2018. **CLOSED (meeting held on 8/22/2018).**
- McAuley to forward comments on Waste Loadout WP to Schleif/Schleif to Consolidate comments from Regulatory Agencies. **CLOSED (Email from Ecology to RL on 8/21/2018).**
- 236-Z ADM - Revision 1 (expected by end of August/first week of September)

June 26, 2018 Ecology/EPA letter - Prerequisites for High Risk Work:

- RL briefing that includes:
  1. An evaluation of the effectiveness of the corrective actions that have been implemented in the Resumption of Work Plan.
  2. A high risk work package.
  3. The lessons learned from the completion of the low-risk demolition.
- Notify EPA/Ecology prior to beginning each phase of high risk work (demolition of A and C lines, and 236-Z rubble pile).

**Attachment 5 Email from Department of Health**

RE: Exhauster & Dose Conversion Doc not setting precedent for future projects

**From:** Mathey, Crystal D (DOH)

**Sent:** Friday, August 17, 2018 5:55 PM

**To:** Schleif, Stephanie (ECY)

**Cc:** Martell, John

**Subject:** RE: Updated Action Item list for PFP Stop Work/WDOH Letter of concern - Exhauster & Dose Conversion Doc Us/ not setting a precedent for future projects

Stephanie,

From our regulatory perspective, the use of the Dose Conversion Document DOE-RL-2006-29\_-\_Rev\_02 in lieu of CAP88 modeling for exhauster use under the circumstances below, would constitute an alternate approval.

Therefore, in order to ensure that allowing this for PFP demolition restart does not set a precedent for future CERCLA projects (especially those closer to the public), WDOH has drafted this email to Ecology for documentation in the PFP PMM meeting minutes.

The PFP RAWP DOE/RL-2011-03, Rev. 1 section 4.3.1.1 Airborne Source Information cites the Dose Conversion Document DOE-RL-2006-29\_-\_Rev\_02 in lieu of a CAP88 run for the use of the exhausters.

However, the Dose Conversion Document, Section 3.4.2 states:

*Nonchronic Releases*

*"However, some of the release scenarios at the Hanford Site may occur over a relatively short period of time (i.e., less than 3 months), may be intermittent, and/or have variable emission rates. These types of releases are not considered chronic releases, which could make use of the dose-per-unit- release factors in Section 4 inappropriate."*

When work is to be done in a short period of time as planned for restart (i.e. less than 3 months as stated above), the concern is that dose-per-unit-release factors for short-term or high-level release scenarios could underestimate doses to the MEI. When the RAWP was originally drafted, it would not have been expected that these "unique" exhausters (i.e. 3 meters, lateral discharge, previously non AG-1, unmonitored, etc.) would be used for a short term campaign.

Another concern is that the MEIs (Offsite MEI: 14.9 miles away from PFP at the Horn of the Yakima River, Onsite MEI: 12.6 miles away from PFP at LIGO) used in the Dose Conversion Document could underestimate predictive dose under certain scenarios such as projects closer to the public.

Therefore, WDOH reiterates that a precedent should not be set for use of the Dose Conversion Document DOE-RL-2006-29\_-\_Rev\_02, rather it must be evaluated for each situation/project.

For PFP demolition resumption, our concerns will be captured in the Agreement for exhauster use. Therefore, the Exhauster Agreement for 234-5 will be utilized to resolve our concerns for this incidence of using the Dose Conversion Document to predict Non Chronic Releases from exhauster use for PFP restart.

Thank you,

**Crystal Mathey**

Radiation Health Physicist 3

Office of Radiation Protection

Washington State Department of Health

[crystal.mathey@doh.wa.gov](mailto:crystal.mathey@doh.wa.gov)

509-578-0843 | [www.doh.wa.gov](http://www.doh.wa.gov)

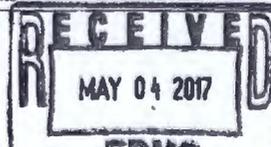


Attachment 6 TPA Change Notice TPA-CN-0780

1243967  
[0071380H]

TRI-PARTY AGREEMENT		
Change Notice Number TPA-CN- 0780	TPA CHANGE NOTICE FORM	Date: March 16, 2017
Document Number, Title, and Revision: DOE/RL-2011-03, Rev. 1, Removal Action Work Plan for the Deactivation, Decontamination, Decommissioning, and Demolition of the Plutonium Finishing Plant Complex 1238095		Date Document Last Issued: March 23, 2016
Approved Change Notices Against this Document: TPA-CN-0739		
Originator: T.K. Teynor	Phone: 509-376-6363	
<b>Description of Change:</b> This change notice documents approval of addendum DOE/RL-2011-03-ADD1, Rev. 0, Removal Action Work Plan for the Deactivation, Decontamination, Decommissioning, and Demolition of the Plutonium Finishing Plant Complex, Temporary Ventilation Exhauster Addendum by Ecology and Department of Energy.		
T.K. Teynor <u>DOE</u> and S.N. Schleif <u>Lead Regulatory Agency</u> agree that the proposed change Modifies an approved workplan/document and will be processed in accordance with the Tri-Party Agreement Action Plan, Section 9.0, Documentation and Records, and not Chapter 12.0, Changes to the Agreement.		
Note: Include affected page number(s): NA		
<b>Justification and Impacts of Change:</b> The addendum will provide additional flexibility in controlling emissions from implementation of work within the scope of the PFF Removal Action (particularly during demolition) by allowing the use of temporary ventilation exhausters. The exhausters will provide a positive impact to workers and the environment as potentially contaminated air from unventilated or poorly ventilated areas is filtered before being discharged to the environment. The exhausters may be used individually or together. Their main use would be to support demolition preparation work activities, but could be used for specific localized ventilation during demolition, or other related work scope.		
The Air Monitoring Plan (Section 4.3) of DOE/RL-2011-03 Rev 1, Removal Action Work Plan for the Deactivation, Decontamination, Decommissioning, and Demolition of the Plutonium Finishing Plant Complex (RAWP) stipulates that if temporary ventilation exhausters that discharge directly to the atmosphere are to be used, that descriptions of the units and proposed monitoring methods be included as an addendum to the PFF RAWP. The work plan states that the approval of the addendum will be accomplished through the TPA change process or by Project Manager Meeting Notes.		
<b>Approvals:</b>		
_____ DOE Project Manager	04-13-2017 Date	X Approved [ ] Disapproved
NA EPA Project Manager	_____ Date	[ ] Approved [ ] Disapproved
_____ Ecology Project Manager	4/25/17 Date	X Approved [ ] Disapproved

1243968



A-6005-413 (REV 1)



## Attachment 7 TPA Change Notice TPA-CN-0817 (Cont.)

DOE/RL-2011-03, REV. 1

1 **Transuranic Mixed Waste.** TRU mixed waste may exist in the form of lead shielding and equipment.  
2 This waste, in all probability, will be solid; however, there could be residual liquid from decontamination  
3 activities or process-related systems.

4 **PCB Waste.** The paint used to coat many of the structure interior surfaces (e.g., walls and ceilings) may  
5 contain elevated levels of PCBs. Light ballasts and other hydraulic and electrical equipment may contain  
6 some level of PCBs. Consequently, some of the waste streams discussed previously may also be  
7 contaminated with PCBs.

8 **Nonregulated Bulk Waste.** Some nonregulated waste (e.g., structure rubble and radiologically released  
9 metal and concrete) is expected to result from demolition.

### 10 4.2.2 Waste Characterization and Designation

11 The waste characterization requirements to support this removal action were developed as part of the  
12 DQO process. Waste generated will be characterized in accordance with the approved SAP  
13 (DOE/RL-2004-29) and the requirements of the receiving facility. Characterization may be accomplished  
14 through process knowledge, sampling/analysis, radiological surveys, etc.

15 The characterization criteria identified in the approved SAP (DOE/RL-2004-29) provide the rationale and  
16 strategy for conducting sampling and analysis activities in support of waste designation. They contain  
17 sampling, analysis, and radiological survey requirements to support waste designation and disposal  
18 decisions during all phases of the removal action project. The characterization data will be used to prepare  
19 waste profile summaries for evaluations against waste acceptance criteria to determine appropriate  
20 disposal options.

### 21 4.2.3 Waste Minimization and Recycling

22 By using waste separation and segregation, waste generation can be kept to a minimum. Waste will be  
23 segregated for the removal action as it is generated, which will minimize the volume of regulated waste.  
24 Waste will be separated into the following categories: LLW, mixed, dangerous, TRU, TRU mixed, and  
25 nonregulated bulk.

26 Decontaminating agents and solutions will be selected to minimize quantities of hazardous substances for  
27 disposal and the volume of waste generated. Waste materials will be recycled, reused, or reclaimed  
28 whenever practicable and economically feasible.

### 29 4.2.4 Waste Handling, Storage, and Packaging

30 All waste packaged for shipment from this removal action will be staged in waste storage areas pending  
31 further action or shipment and identified by signs reading "CERCLA WASTE MANAGEMENT AREA."  
32 Incompatible waste will be separated within the waste storage areas to prevent commingling of the waste.

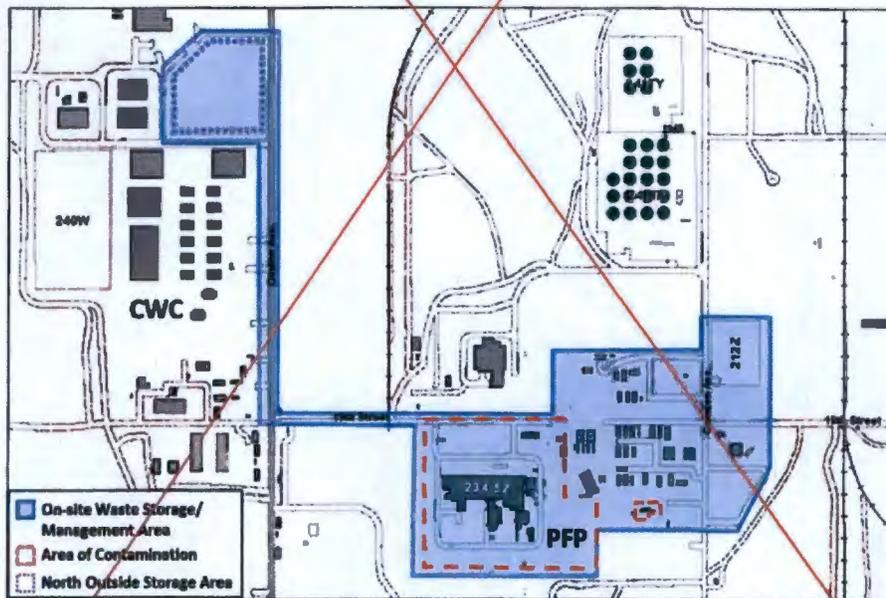
33 All packaged waste staged will meet the ARARs identified in the Action Memorandum  
34 (DOE/RL-2005-13). Appropriate areas will be established in which waste is staged prior to shipment, if  
35 necessary. These waste staging and storage areas ~~either reside within the area of contamination or in the~~  
36 on-site waste storage/management area, as identified in Figure 4-2, including the areas adjacent to the  
37 west, east, northeast, and south of the outer PFP fence line and the North Outside Storage Area. To  
38 facilitate PFP project logistics, waste staging and storage areas may be relocated, as needed, within the  
39 on-site area. A means of tracking waste staging and storage areas will be maintained at PFP. These waste  
40 staging and storage areas are on-site and are necessary for implementation of the removal action.

41 Demolition will result in piles of bulk demolition waste. This waste will be processed and loaded  
42 concurrently with demolition activities. These piles of bulk demolition waste will be on or near the

Attachment 7 TPA Change Notice TPA-CN-0817 (Cont.)

DOE/RL-2011-03, REV. 1

- 1 associated structure footprint and positioned to allow equipment access to the structure undergoing  
2 demolition and equipment access to the bulk waste.
- 3 The CERCLA hazardous waste areas will be inspected weekly, and the universal waste and recyclables  
4 management areas will be inspected quarterly at a minimum to verify container integrity, legibility of  
5 markings and labels, and proper placement of signs. An inventory of the waste generated will be  
6 maintained. Before shipment to ERDF, the North Outside Storage Area, or an off-site location (e.g.,  
7 Perma-fix Northwest), the containers must be properly sealed and checked for leaks or other damage. At  
8 that time, a final inspection will be performed. Regulated waste from the removal action activities will be  
9 packaged per 49 CFR 100-185 regulations (or equivalent approved packaging guidelines for Hanford Site  
10 shipments). Samples and associated sample waste may be returned to PFP for disposition or sent to ERDF  
11 for disposal, if it meets the waste acceptance criteria.
- 12 Most contaminated soil and other remediation waste (e.g., structure rubble) that can be characterized as  
13 LLW and meeting ERDF Waste Acceptance Criteria will be shipped in bulk to ERDF using  
14 roll-off/roll-on containers that will have liners. Additionally, the trailer units will be equipped with tarps.  
15 If needed, other approved packages (e.g., burial boxes and/or sea-land containers) may be used for surface  
16 contaminated objects, bulk, and low specific activity shipments.
- 17 Waste not appropriate for bulk shipment (e.g., piping, transfer columns, or other processing equipment)  
18 will be cut to size, packaged, and shipped in non-bulk containers to meet the appropriate facility's waste  
19 acceptance criteria. The containers must also be weighed and visually inspected for leaks or other damage  
20 before the waste is transported.



21  
22 Figure 4-2. PFP Removal Action On-site Waste Storage/Management Area and Area of Contamination

## Attachment 7 TPA Change Notice TPA-CN-0817 (Cont.)

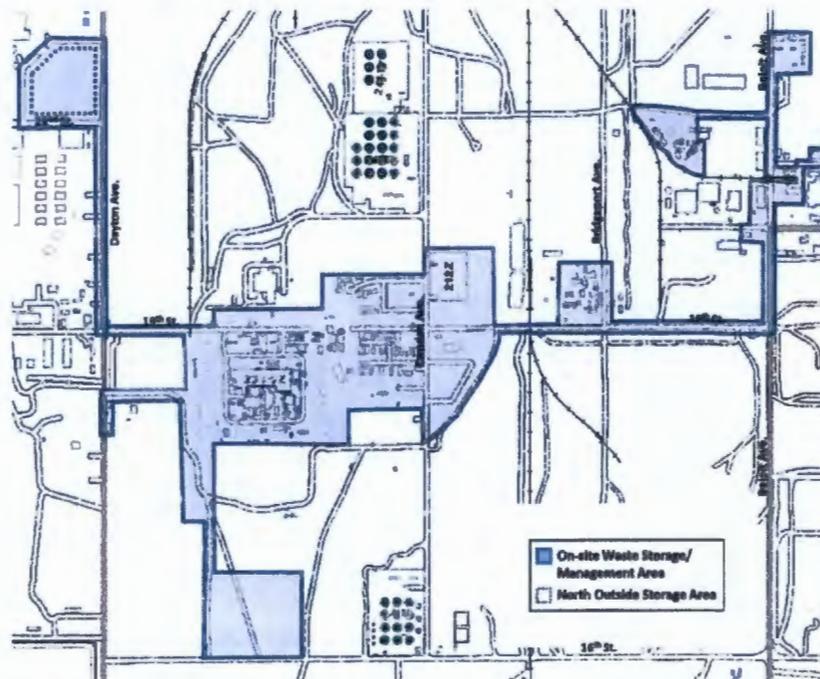
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14 roll-off/roll-on containers that will have liners. Additionally, the trailer units will be equipped with tarps.  
15 If needed, other approved packages (e.g., burial boxes and/or sea-land containers) may be used for surface  
16 contaminated objects, bulk, and low specific activity shipments.

17 Waste not appropriate for bulk shipment (e.g., piping, transfer columns, or other processing equipment)  
18 will be cut to size, packaged, and shipped in non-bulk containers to meet the appropriate facility's waste  
19 acceptance criteria. The containers must also be weighed and visually inspected for leaks or other damage  
20 before the waste is transported.



21

22 **Figure 4-2. PFP Removal Action On-site Waste Storage/Management Area and Area of Contamination**

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- 1 • Fixatives or cover material (e.g., soil, gravel, and plastic) will be applied to disturbed contaminated  
2 soils and debris associated with the PFP Complex demolition activities at any time field activities will  
3 be inactive for more than 24 hours. Additionally, if the sustained wind speed is predicted to be greater  
4 than 32 km/hr (20 mi/hr) overnight, based on the Hanford Meteorological Station forecast, fixative or  
5 cover material will be applied, as practicable.
  - 6 • Before starting intrusive activities (such as isolating utilities and piping, or dismantling an exhaust  
7 system), removable contamination in the affected area(s) will be fixed, or reduced to ALARA.  
8 Measures such as decontamination solutions, expandable foam, encasement in grout, fixatives, or  
9 glove bags also will be used to the extent practicable to help minimize the spread of contamination.
  - 10 • During open-air demolition, stabilized items identified as requiring special handling would be  
11 managed in a manner to minimize disturbance of the contamination. Methods of stabilization will be  
12 implemented prior to demolition to address void space issues and eliminate the need for excessive  
13 crushing, size reduction, or other actions that could lead to potential airborne releases.
  - 14 • Applicable work documents for demolition and debris loadout activities will incorporate processes  
15 and controls needed to ensure key assumptions from the PFP air dispersion modeling reports remain  
16 valid (PNNL-27456, *Air Dispersion Modeling of Radioactive Releases During Proposed 234-5Z*  
17 *Building Demolition Activities* and PNNL-27464, *Air Dispersion Modeling of Radioactive Releases*  
18 *During Proposed 236Z Rubble Pile Activities*). DOE will inform Ecology of potential changes to  
19 work processes and controls which could deviate from meeting the key assumptions in advance of  
20 implementation. Ecology will be provided the opportunity to review and comment on such changes.
  - 21 • Radioactive surface contamination or airborne concentrations from PFP work activities found beyond  
22 PFP radiological controlled areas (e.g., Radiological Buffer Area) above 10 CFR 835 posting criteria  
23 (i.e., 20 dpm/100 cm<sup>2</sup> removable alpha contamination or 12 Derived Air Concentration (DAC)-  
24 hr/week), or airborne concentrations exceeding 1.9x10<sup>-16</sup> Ci/m<sup>3</sup> of Am-241, 2.1x10<sup>-16</sup> Ci/m<sup>3</sup> of Pu-238,  
25 2.0x10<sup>-16</sup> Ci/m<sup>3</sup> of Pu-239/240, or 1.0x10<sup>-14</sup> Ci/m<sup>3</sup> of Pu-241 as measured every six months by the  
26 near field ambient air monitoring stations listed in Section 4.3.1.3 of this RAWP will be reported to  
27 Ecology (within 24 hours upon discovery) who will make further notifications as necessary.
  - 28 • TRU waste containers will remain closed, except during packaging and waste inspection activities.
  - 29 • Any vacuum cleaners and portable exhausters used for demolition activities will be equipped with  
30 appropriately tested nonstandard (HEPA-type) filters.
- 31 The following additional controls have been selected and could be implemented as practicable to  
32 minimize diffuse and fugitive emissions further:
- 33 • Planning for the special handling of stabilized items while minimizing risk of damage during  
34 handling
  - 35 • Vacuum cleaners and/or portable exhausters used for demolition activities equipped with HEPA-type  
36 filters to provide point source or down draft contamination control
  - 37 • Temporary exhausters with HEPA filters to provide alternate exhaust as practicable during  
38 decommissioning and preparation for final demolition
- 39 Temporary contamination control structures may be used as practicable with or without active portable  
40 HEPA-type filtered exhausters during portions of the demolition preparation activities to minimize  
41 worker exposure. HEPA-type is intended to reflect nonstandard application of HEPA abatement not

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1 meeting engineered specifications of the applicable standards. No abatement credit is taken for  
2 "HEPA-type" devices.

### 3 **4.3.1.3 Airborne Emission Monitoring**

4 The quantification of radioactive air emissions and air monitoring has been identified as requirements for  
5 D4 activities. There are two components associated with airborne emissions monitoring at PFP. Point  
6 source monitoring (e.g., stacks, HEPA-filtered vacuums, portable HEPA-filtered exhausters, temporary  
7 exhausters) and diffuse and fugitive monitoring (temporary ambient air monitors, near facility monitors,  
8 radiological surveys). During the D4 activities at the PFP Complex, both components (point sources and  
9 diffuse and fugitive sources) will be monitored at the same time. Monitoring activities may include:

- 10 • Real time and periodic radiological monitoring using temporary ambient air monitors as prescribed by  
11 the Radiological Control organization (primary method for evaluating compliance with the action  
12 levels and void limits), with concurrence from the Environmental organization.

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1 minor source criterion. If contamination levels over 2,000 dpm alpha/100 cm<sup>2</sup> (i.e., high surface  
2 contamination area) are inadvertently exceeded, a separate evaluation regarding emissions  
3 measurement will be conducted.

4 Portable HEPA-type filtered vacuums, portable HEPA-type filtered exhausters, and various types of  
5 containments will be used, as needed. A distinction between portable HEPA-type filtered exhausters and  
6 temporary HEPA filtered exhausters is intended. Portable exhausters are minor emission units that are  
7 easily set up for use and readily portable, being either hand carried or wheel mounted. Due to the nature  
8 of the activities involving use of the HEPA-type filtered air movers, measurable abated releases  
9 associated with these devices are not anticipated, and the near facility monitoring stations described  
10 below will be used to assess air emissions for the activities associated with these portable point sources.

11 Once demolition activities begin, worksite air monitoring will be the primary indicator of effectiveness of  
12 abatement and ALARA control methods during demolition activities. Worksite monitoring includes using  
13 temporary ambient air monitors (real time continuous air monitors with alarms, personnel samplers,  
14 ambient air samplers) and surveys. The worksite monitoring network will be established as directed by  
15 the Radiological Control organization, with concurrence from the Environmental organization, and will  
16 be focused around and in the established demolition zones. This monitoring network provides the primary  
17 emissions data used to ensure the limits set in the RWP are not exceeded. At a minimum, three (one  
18 upwind and two downwind) real time alpha continuous air monitors with alarms will be located at each  
19 demolition zone boundary.

20 In the event of a continuous air monitor alarm (not including spurious or radon related alarms), stored  
21 continuous air monitoring data will be retrieved by the project for trending and analysis. As entry into or  
22 near the radiological control areas will be necessary to access the continuous air monitor data, worker  
23 safety will be a factor in retrieving this information and therefore the process of deploying employees will  
24 be in line with current worker protection and ALARA considerations.

25 In addition to point source monitoring and worksite monitoring, the 200 West Area Near Facility  
26 Ambient Air Program stations nearest the PFP Complex (shown in Figure 4-3) provide a secondary layer  
27 of monitoring. These six stations (N433, N554, N975, N165, N155, and N555) do not provide real time  
28 data so their data will be used as indicators along with the worksite monitoring data for overall trending of  
29 potential diffuse and fugitive emissions. During periods of demolition and debris removal, no more than  
30 one of these six monitors will be allowed to be inoperative for more than 24 hours.

31 The Hanford Site perimeter monitoring provides the last layer of monitoring and is used to measure the  
32 diffuse and fugitive emissions from the Hanford Site.

33 The well-established Hanford Site protocol for emission monitoring will be followed, including  
34 Hanford Site perimeter ambient air data collection, sampling frequencies, sample analysis, and data  
35 reporting (DOE/RL-91-50, *Hanford Site Environmental Monitoring Plan*). This method will address the  
36 substantive requirements of WAC 246-247-75.

37 Demonstration of compliance with the 40 CFR 61.92 effective dose equivalent of 10 mrem/year limit is  
38 provided by the Radioactive Air Emissions Report for the Hanford Site.

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## 5 Project Management

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This chapter describes overall project management elements for the PFP removal action.

### 5.1 Project Team

The project team includes the individuals working to accomplish the removal action. Accordingly, the project team includes a DOE Project Manager representing the Lead Agency, an Ecology Project Manager representing the Lead Regulatory Agency and a Contractor Project Manager.

The DOE Project Manager is responsible for monitoring the technical/scope, cost, and schedule baselines through all phases of this removal action.

The Ecology Project Manager is responsible for regulatory oversight.

The Contractor Project Manager has overall responsibility and accountability for the performance of all activities associated with this removal action.

### 5.2 Project Cost and Schedule Tracking

The demolition of structures is part of the overall TPA (Ecology et al., 1989a) milestone M-083-00A completion schedule. This overall schedule is provided as Figure 5-1. This schedule is subject to acceleration or delay due to changes in priority as determined by the TPA (Ecology et al., 1989a) signatories and consistent with the TPA change processes.

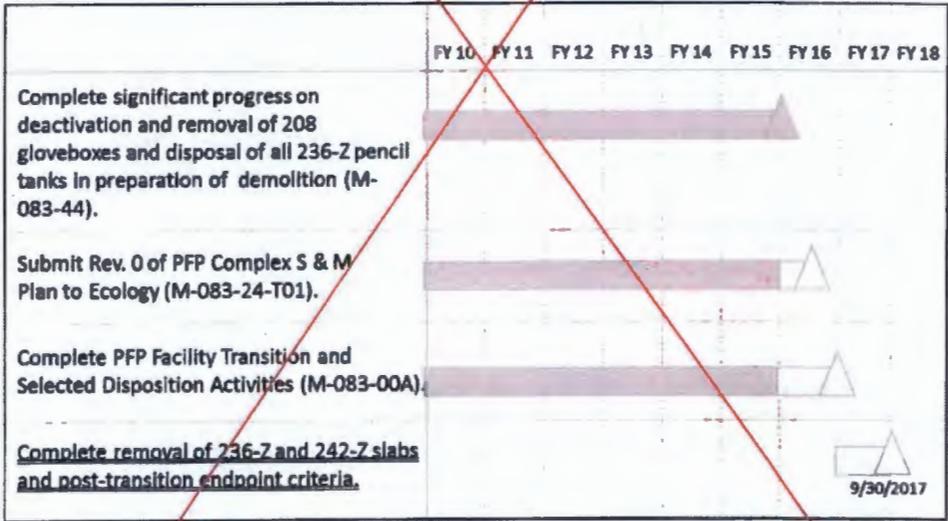


Figure 5-1. Project Schedule

Cost and schedule tracking is managed in accordance with Section 4 of the TPA (Ecology et al., 1989a).

## Attachment 7 TPA Change Notice TPA-CN-0817 (Cont.)

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1

### 5 Project Management

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 5 project team includes a DOE Project Manager representing the Lead Agency, an Ecology Project  
 6 Manager representing the Lead Regulatory Agency and a Contractor Project Manager.

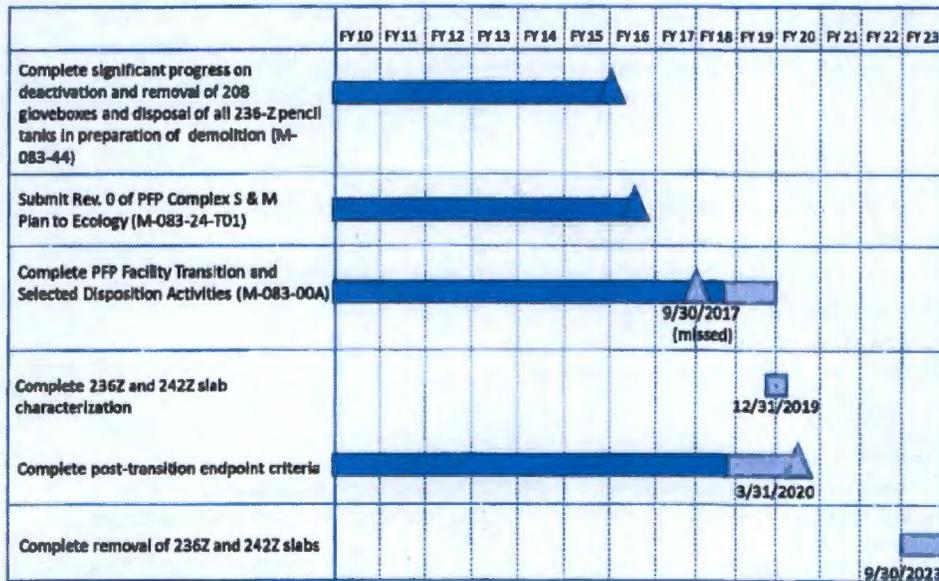
7 The DOE Project Manager is responsible for monitoring the technical/scope, cost, and schedule baselines  
 8 through all phases of this removal action.

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17

Figure 5-1. Project Schedule

18

19 Cost and schedule tracking is managed in accordance with Section 4 of the TPA (Ecology et al., 1989a).

## Attachment 7 TPA Change Notice TPA-CN-0817 (Cont.)

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1 SW-846, *Test Methods for Evaluating Solid Waste: Physical/Chemical Methods, Third Edition; Final*  
2 *Update IV-B*. QA activities will use a graded approach based on the potential impact on the environment,  
3 safety, health, reliability, and continuity of operations. Other specific activities will include QA  
4 implementation, responsibilities and authority, document control, QA records, and audits.

### 5 **5.7 Removal Action Closeout**

6 Removal action closeout will consist of a review to determine the final action status and validation that  
7 the Action Memorandum (DOE/RL-2005-13) is completed, the S&M Plan is approved, property is turned  
8 over to S&M, and appropriate documents are incorporated into the administrative record.

#### 9 **5.7.1 Final Project Status**

10 To achieve the removal action end state, endpoints for dismantlement of the PFP Complex to  
11 slab-on-grade must be achieved consistent with removal action objectives specified in the EE/CA.  
12 Project closeout consists of endpoint criteria completion. The status of the performance measures at  
13 completion of each project will be evaluated. At a minimum, a final updated schedule and cost report will  
14 be completed and added to the project file. Any in-scope work not completed will be noted. Once a  
15 structure is determined to have met pre-transition endpoint criteria, it will be ready to be transferred for  
16 S&M activities.

17 Documentation required to support transition to a safe and stable S&M mode will be provided in a  
18 turnover package at transition to S&M (completion of M-083-00A). The final turnover package will be  
19 provided at the completion of all post-transition endpoint criteria by ~~September 30, 2018~~ March 31, 2020,  
20 as identified in Figure 5-1. The turnover package will support future surveillances, audits, and final  
21 disposition planning. It will be provided to the organization responsible for S&M of the PFP Complex  
22 following completion of the above-grade removal action and be available for the final remedial action  
23 planning. The following specific elements must be addressed in the turnover package:

- 24 • The as left condition of confined spaces (eliminated or sealed)
- 25 • Compliance with the asbestos standards
- 26 • The as left condition and location of remaining below-grade equipment
- 27 • Description of remaining industrial hazards
- 28 • The amount and locations of remaining radiological contamination/hazardous substances
- 29 • Final radiological surveys
- 30 • Work packages and plans
- 31 • Modified configuration management documents
- 32 • Photographs

#### 33 **5.7.2 Records Disposition and Retention**

34 Records created during the execution of the PFP Complex removal action are managed in accordance  
35 with Section 9.4 of the TPA Action Plan (Ecology et al., 1989b, *Hanford Federal Facility Agreement and*  
36 *Consent Order Action Plan*).

## Attachment 7 TPA Change Notice TPA-CN-0817 (Cont.)

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- 1 *National Historic Preservation Act of 1966*, 16 USC 470, et seq. Available at:  
2 <http://www.achp.gov/docs/nhpa%202008-final.pdf>.
- 3 PNNL-27456, 2018. *Air Dispersion Modeling of Radioactive Releases During Proposed 234-5Z Building*  
4 *Demolition Activities*. Pacific Northwest National Laboratory, Richland, Washington.
- 5 PNNL-27464. *Air Dispersion Modeling of Radioactive Releases During Proposed 236Z Rubble Pile*  
6 *Activities*. Pacific Northwest National Laboratory, Richland, Washington.
- 7 RCW 43.21A, "Department of Ecology," *Revised Code of Washington*, Olympia, Washington.  
8 Available at: <http://apps.leg.wa.gov/RCW/default.aspx?cite=43.21A>.
- 9 RCW 70.94, "Washington Clean Air Act," *Revised Code of Washington*, Olympia, Washington.  
10 Available at: <http://apps.leg.wa.gov/RCW/default.aspx?cite=70.94>.
- 11 RCW 70.95, "Solid Waste Management—Reduction and Recycling," *Revised Code of Washington*,  
12 Olympia, Washington. Available at: <http://apps.leg.wa.gov/RCW/default.aspx?cite=70.95>.
- 13 RCW 70.105, "Hazardous Waste Management," *Revised Code of Washington*, Olympia, Washington.  
14 Available at: <http://apps.leg.wa.gov/RCW/default.aspx?cite=70.105>.
- 15 *Resource Conservation and Recovery Act of 1976*, 42 USC 6901, et seq. Available at:  
16 <http://www.epa.gov/epawaste/inforesources/online/index.htm>.
- 17 SW-846, 2007, *Test Methods for Evaluating Solid Waste: Physical/Chemical Methods, Third Edition;*  
18 *Final Update IV-B*, as amended, Office of Solid Waste and Emergency Response,  
19 U.S. Environmental Protection Agency, Washington, D.C. Available at:  
20 <http://www.epa.gov/epawaste/hazard/testmethods/sw846/online/index.htm>.
- 21 *Toxic Substances Control Act of 1976*, 15 USC 2601, et seq. Available at:  
22 <http://www.epw.senate.gov/tsca.pdf>.
- 23 TPA-CN-254, 2009, *Change Notice for Modifying Approved Documents/Workplans in Accordance with*  
24 *the Tri-Party Agreement Action Plan Section 9.0 Documentation and Records:*  
25 *DOE/RL-2005-14, Revision 0, Removal Action Work Plan For The Plutonium Finishing Plant*  
26 *Above-Grade Structures: Facility Deactivation*, dated February 26, U.S. Department of  
27 Energy, Richland Operations Office, and U.S. Environmental Protection Agency, Richland,  
28 Washington. Available at:  
29 <http://pdw.hanford.gov/arpir/index.cfm/viewDoc?accession=0912220122>.
- 30 TPA-CN-255, 2009, *Change Notice for Modifying Approved Documents/Workplans In Accordance with*  
31 *the Tri-Party Agreement Action Plan, Section 9.0, Documentation and Records:*  
32 *DOE/RL-2005-15, Revision 0, Removal Action Work Plan for the Plutonium Finishing Plant*  
33 *Above-Grade Structures: Ancillary Facility Demolition*, dated February 26, U.S. Department  
34 of Energy, Richland Operations Office, and Washington State Department of Ecology,  
35 Richland, Washington. Available at:  
36 <http://pdw.hanford.gov/arpir/index.cfm/viewDoc?accession=1109060935>.
- 37 WAC 173-160, "Minimum Standards for Construction and Maintenance of Wells," *Washington*  
38 *Administrative Code*, Olympia, Washington. Available at:  
39 <http://apps.leg.wa.gov/WAC/default.aspx?cite=173-160>.
- 40 WAC 173-162, "Regulation and Licensing of Well Contractors and Operators," *Washington*  
41 *Administrative Code*, Olympia, Washington. Available at:  
42 <http://apps.leg.wa.gov/WAC/default.aspx?cite=173-162>.
- 43 WAC 173-216, "State Waste Discharge Permit Program," *Washington Administrative Code*, Olympia,  
44 Washington. Available at: <http://apps.leg.wa.gov/WAC/default.aspx?cite=173-216>.
- 45 216-020, "Policy Enunciated."

**PFM Project Managers Meeting**  
**2420 STVCN, CR 408**  
**August 28, 2018**  
**ATTENDANCE LIST**

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1. Mariana Oswa H-Spy	CHPRC - PFP	373-4422
2. Bill Cox	CHPRC-PFP	372-9345
3. Emerald Länja	EPA	202-564-2721
4. Tom Teyner	DOE-RL	376-6363
5. Kelly Wodey	CHPRC-PFP	308-9861
6. Crystal Martney	WDOH	609-578-0843
7. Stephanie Scholt	Ecology	372-7929
8. JOHN MARTELL	WDOH	946-3798
9. Glenn R. Konzeck	DOE-RL	376-8399
10. Jim McAuley	EPA	on phone
11. Allison Wright	DOE-RL	373-7303
12. Todd Southerland	CHPRC	on phone
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