

Meeting Minutes
March 28th, 2000
Inter-Agency Management Integration Team (IAMIT)

Approval: Michael A. Wilson Date: 6/27/00
Michael A. Wilson (B5-18)
Chairperson
Ecology IAMIT Representative

Approval: William W. (Wade) Ballard Date: 6/27/00
William W. (Wade) Ballard (A5-12)
RL IAMIT Representative

Approval: Douglas R. Sherwood Date: 6/27/00
Douglas R. Sherwood (B5-01)
EPA IAMIT Representative

Minutes Prepared by: Deborah F. Iwatate
Approval: Deborah F. Iwatate Date: 6-21-00
Deborah F. Iwatate (A1-14)
Fluor Hanford, Inc.

DISTRIBUTION

Ballard, W.	RL	A5-12 *	Murillo, D. G.	ORP	A2-15
Bartz, J.	Ecology	B5-15	Murphy-Fitch, E.	FH	A1-14 *
Bryson, D. C.	RL	H6-60	Piippo, R. E.	FH	A1-14 *
Cusack, L.	Ecology	B5-18 *	Prignano, A. L.	FH	G1-30
Dagan, E. B.	RL	A5-15 *	Riess, M. J.	CHG	A1-14 *
Dahl, S.	Ecology	A5-15	Rodriguez, H. M.	RL	A5-15 *
Furman, M. J.	RL	A5-13	Sanders, G. H.	RL	A5-15 *
Goswami, D.	Ecology	B5-15	Sherwood, D. R.	EPA	B5-01. *
Hedges, J.	Ecology	B5-15	Skurla, S. J.	Ecology	B5-15
Hertzel, J. S.	FH	A1-14 *	Sobczyk, S.	Nez Perce	
Huckaby, A. D.	Ecology	B5-15	Stanley, R.	Ecology	Lacey *
Iwatate, D. F.	FH	A1-14 *	Taylor, W. J.	ORP	H6-60 *
Jarvis, M. F.	RL	A5-15 *	Thompson, K. M.	RL	A5-13
Leja, S.	Ecology	B5-18	Yerxa, J. K.	RL	A5-15
Mattlin, E. M.	RL	A2-15	Williams, B. A.	PNNL	K6-81
Morrison R. D.	FH	A1-14 *	Wilson, M. A.	Ecology	B5-18 *
			Administrative Record	EDMC	H6-08 *

* w/Attachments

File: IAMIT Minutes.MAR00.doc

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General

- Initials provided with comments (below) are keyed to the attendees/distribution list for these minutes.

CY2000 RCRA Well Installation (M-24-00)

(S. Leja, K. M. Thompson)

- **MT** - Requirement for RCRA wells. State did an independent analysis that did not agree with the Hanford Site evaluation. We (DOE) are now in the dispute process over the differences. The DOE needs to come up with another offer for the regulators.
- **DB** - The DQO and the funding restraints make the possibility of another offer very tough. DOE will support the obligations of the DQO, but feels that this position will constitute, "going up another notch".
- **DS** (EPA) - Just how far apart are we on this?
- **DB** - The DQO has stated 14 wells will be prepared (Note that [only] 7 are for ORP). The state would like to see 19 wells (with 16 of those for ORP). The major disconnect between the two Parties is the **degree** of implementation (i.e., the number of wells) and the **rate** of installation. The dispute is not only on the number of wells that are required, but also the spacing, and where those wells will go. There is also dispute on whether the wells should be emplaced one, two, three, or four layers deep.
- **SL** (Ecology) - There is a large area downgrade of the tank farms that don't have coverage. We are also talking specifically about 2001 through 2004 and areas [that require wells] in addition to the tank farms. This includes assessment wells and monitoring wells. Feels that the current configuration is not adequate to pick up the expected plumes.
- **DS** - Then the debate is really with ORP? (No response directly to this question)
- **SL** - At this point the question is, whether or not to extend the debate upward from the IAMIT.
- **DB** - Feels that we are approaching [the need for] an upper management decision on this and that is where it needs to go.
- **JY** - The longer we dispute this item, the more field time we lose.
- **LC** - Do you think we are on a path (and have a need) for a Director's Determination? (No specific response provided)
- **DB** - Each month that we push this out makes it harder, and more expensive, to do the work.
- **WB** - This is a legitimate request that is related to other items as well: related to the cost/funding for tasks.
- **DS** - The approach that this is a, "new item," is just not true. DOE should have known that this was coming at the beginning of the year.
- **WB** - Sees no question that this will need to be bumped up.
- **DB** - At this level (i.e., the IAMIT), it does not seem possible to decide on and consider all of the facets of this problem. Needs to be done at a higher level.
- **SD** - Does not feel that a Director's Determination is appropriate to resolve the issue of where the funds should come from, where they should go, or what work is to be done. Consider that an appeal process would kick in.
- **DB** - Does not want to see this delayed for another month.
- **DS** - Are you (DOE) committing to having a counter-proposal prepared?.
- **MT & WT** - Stated agreement that they (DOE) will be preparing such a letter/proposal during the coming week. DOE has a specific amount of funds [available] and that only a limited number of wells can be done. DOE will be doing what they can do [within these funding constraints]. There are people working on determining the delta between what is required and what is possible.
- **LC** - It seems that efforts would be better spent in coming up with a counter-proposal, rather than proceeding with the preparation of a statement of dispute. Then there will be a proposal back to Ecology, worked on at the Project Manager level?
- **MT** - DOE will prepare a paper of what can be done this year, including a proposal of the impacts of putting in, or not putting in, the wells. This will also include a statement of the location and number of wells. We

(DOE) will propose what we can do this year and what the impacts will be in light of that proposal. We should then proceed from that point.

- **SL** - Do you (DOE) feel that the number of wells and the budget will be any different to what has been proposed over the past months?
- **MT** - We don't have an answer for that question yet. Reminded that there are multiple "owners" of the wells - outside of, and in addition to, the ORP needs. These need to obtain funding support also.

Polychlorinated Biphenyls (PCBs) Toxic Substances Control Act (TSCA) Tank Waste Treatment (D. Sherwood, J. Poppiti)

- **DS** - Opening statement: Stated that we need to work out a technical solution, and that we need to improve communication on the [PCB] subject. He did not like learning about this by reading the paper. Felt that this [type of information] should be conveyed directly from DOE to the regulators. We (EPA) weren't aware of the paperwork that had already gone back and forth between BNFL and the DOE over the past several months on this subject - and that this was a potentially \$1.5B cost increase that would have to be addressed. They consider this to be a very big problem, in light of the ongoing tank waste negotiations. Asked that DOE do better about this type of communication [should there be a] next time. Wanted to know if there was any other issue(s) related to this problem that they should know about? Did not like getting blind-sided with such information.
- **SD** - Ecology has become increasingly frustrated over the lack of communication for topics such as this. We have been asking about information on PCB's for 5 years and told that BNFL wouldn't be getting any. Not much has ever happened... not a lot of effort to get back to Ecology. Even though it is known to have been brought up in BNFL meetings. At this critical time of the negotiations this is a very bad thing to surface.
- **JP** - There is data and correspondence regarding the labs and others and that is available. There was some material left in the bottom of a T-plant tank that had about 700 ppm of PCB. What does that say about the status of the tank? Does it cause us to move into TSCA regulation or not? Spending that much money to reduce such a small risk might not be a good path. The 222-S material was actually "nothing" in comparison - a few ppb..
- **DS** - Having the letters [regarding what is there, and where it is located] is crucial to determining the regulation. Did the DOE provide the Government Accounting Office (GAO) a technical response to the BNFL write-up? Did DOE have anything stated on the record? Additional work regarding the disposal of secondary waste. Forget the TSCA regulation... is DOE doing the right thing?
- **WT** - Yes, we are [doing the right thing] - putting the documentation in place prior to the first transfers.
- **DS** - There are design-related elements of this discovery that need to be addressed also.
- **JP** - Several tanks have been sampled and nothing has been found above the detection level. The more salt and "gunk" in the matrix, the higher the detection limit. Of all the samples that were taken, none showed content above a ppm.
- **DS** - [Ecology] Still wants to know... is DOE going to tell the GAO that these numbers [from BNFL] are inaccurate?
- **WT** - We had been struggling with the resolution of the TSCA issue for some time. Regulatory folks were asked to provide an estimate of the impacts on the tank system. They came up with a \$300M number. Dick French wanted a good technical estimate from the knowledgeable contractor staff. It was then a challenge to even phrase the request correctly. The estimate came back in the form of the letter (Attachment 1). DOE can certainly respond to the letter if needed.
- **DS** - EPA is worried about having to respond to the Congressional Committee that is doing an investigation of this topic.
- **WT** - Comments and dialog are ongoing with the [DOE] folks in the Forrestal Building (HQ). The outcome of this dialog is available if needed.
- **DS** - This is all very similar to past discussions and revelations on the SNF sludge - and we certainly hope that it doesn't happen again. Summarized with: "In the future, when you (DOE) see something coming that will be as important and controversial as this... please call US first!"

- **WT** - Brought attention to the fact that this issue is a show-stopper - with the upcoming decision to proceed coming up in the next few weeks.
 - There was some additional, general discussion from all attendees.
-

Hanford Advisory Board Presentations Discussion

(W. Ballard, L. Cusack, D. Sherwood)

- This was a general discussion about topics that would be presented at the next HAB meeting.
- **WB** - Re: Discussion regarding inspections as a regulatory tool? Suggested that this subject/discussion should be presented by EPA and Ecology.

ATTENDEES

INTER AGENCY MANAGEMENT INTEGRATION TEAM (IAMIT) MEETING

DATE: 3-28-2000

<u>NAME</u>	<u>ORGANIZATION</u>	<u>MAILSTOP</u>	<u>(✓) FOR ATTACHMENTS</u>
✓ <u>JON YERXA</u>	<u>U.S. DOE-RL-ORL</u>	<u>A5-15</u>	
✓ <u>Hector M Rodriguez</u>	<u>DOE-ORL</u>	<u>A5-15</u>	✓
✓ <u>Andrea Prignano</u>	<u>FH/ES</u>	<u>G1-30</u>	
✓ <u>Jane Hedco</u>	<u>Ecology</u>		
✓ <u>MARK RIESS</u>	<u>CHG</u>		✓
✓ <u>LAURA CUSACK</u>	<u>Ecology</u>		✓
✓ <u>M. J. FURMAN</u>	<u>DOE-GW/VZ</u>		
✓ <u>K. Michael Thompson</u>	<u>DOE-RL</u>		
✓ <u>Jana Bryson</u>	<u>DOE-ORP</u>		
✓ <u>TRACE A. WILLIAMS</u>	<u>PNNL</u>	<u>K6-81</u>	
✓ <u>Stan Leja</u>	<u>Ecology</u>		
✓ <u>Dib Goswami</u>	<u>Ecology</u>		
✓ <u>Alison D. Huckaby</u>	<u>Ecology</u>		
✓ <u>Keun Garms</u>	<u>CHG</u>	<u>A1-14</u>	✓

**AGENDA
INTER AGENCY MANAGEMENT INTEGRATION TEAM (IAMIT)
MEETING**

March 28, 2000

1:00 PM – 2:00 PM

**EPA CONFERENCE ROOM
712 SWIFT BLVD., SUITE 5**

CHAIRPERSON: D. R. Sherwood

1:00 pm CY 2000 RCRA WELL INSTALLATION
(S. Leja, K.M. Thompson)

1:15 pm POLYCHLORINATED BIPHENYLS / TSCA / TANK WASTE TREATMENT
(D. Sherwood, J. Poppiti)

1:30 pm HANFORD ADVISORY BOARD PRESENTATIONS DISCUSSION
(W. Ballard, L. Cusack, D. Sherwood)

2:00 pm ADJOURN



River Protection Project
Waste Treatment Plant
3000 George Washington Way
Richland, WA 99352
Tel: (509) 371-3500
Fax: (509) 371-3504

Mr. Michael K. Barrett
U.S. Department of Energy
Office of River Protection
P.O. Box 550, MSIN H6-60
Richland, Washington 99352

Direct tel: (509) 373-4143
Direct fax: (509) 373-0628

CCN: 008809

DEC 15 1999

Dear Mr. Barrett:

**CONTRACT NO. DE-AC06-96RL13308 – W375 – EVALUATION OF PROJECTED
IMPACTS FROM POTENTIAL TOXIC SUBSTANCES CONTROL ACT
REGULATION OF FEED**

References: 1) CCN 008653, Letter, Michael K. Barrett, DOE/ORP, to M.J. Lawrence, BNFL Inc., "Evaluation of Projected Impacts from Potential Toxic Substances Control Act (TSCA) Regulation of Feed," 99-DPD-063, dated November 29, 1999.

The following response to your referenced letter is provided without prejudice to any future evaluation of cost, schedule or other contractual implication should the DOE instruct BNFL to take account of TSCA regulation and the distribution of PCBs in the future. The findings contained in this letter are based on a minimal amount of work given the short timescale and limited resources available.

BNFL Inc. has carried out an assessment of the impact of Toxic Substances Control Act (TSCA) regulation of River Protection Project – Waste Treatment Plant (RPP-WTP) feeds. The assessment has been performed by a small specialist group in order to avoid impacting our B1 deliverables. We have identified the main features affected by TSCA and have produced an assessment of cost and schedule impacts consistent with the level of information available.

The estimated cost of carrying out this assessment has been recorded separately and is well within the not to exceed cost given in Reference 1.

The details of our assessment are given in Attachment 1 and can be summarized according to the headings in Reference 1.

Physical Modifications/Additions to RPP-WTP

The main addition is likely to be a secondary combustion unit in both the HLW and LAW Vitrification off gas systems to meet TSCA required destruction efficiencies.

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DEC 22 1999

RECORDS MGMT.

Mr. M. K. Barrett
Page 2 of 3

CCN: 008809

Process Modifications/Additions

Additional waste characterization work, waste treatability studies, and an additional performance test will be required to establish the flowsheet and equipment performance.

Additional Administrative Requirements

Additional resources would be required to manage a joint TSCA/RCRA permit and the associated interactions with EPA and there are additional operating costs associated with operator training and record keeping.

Differential Capital Cost

The increase in capital costs are estimated to be of the order of \$520M which includes increased cost associated with B1 and cost in B2 up to facility operations.

Differential Operating Cost

The increase in operating costs are estimated to be of the order of \$160M which includes deactivation.

Differential Financing Cost

It has not been possible to translate the costs identified above into an impact on price. As an indication a pro rata based on previous submission (e.g. Oct IMP) would result in a price impact of about \$1.5B. There are significant risks relating to investor support for the project if new regulatory requirements are introduced at this stage prior to financial closure.

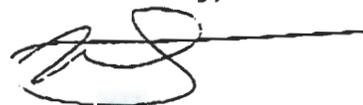
Differential Schedule Impact

In order to implement TSCA requirements it is estimated that an additional 18 months would be required in B1 and an additional 27 months would be required in B-2 to complete the contract quantities and deactivate the facility.

Clearly the cost and schedule impacts of TSCA are potentially very high and would require more detailed analysis before any formal commitment could be made. A full analysis of the implications would be a substantial effort and would seriously affect our ability to meet current B1 commitments.

For further clarification of the contents of this assessment please contact Mr. Andy Elsdon on 371-3593.

Yours sincerely,



Maurice J. Bullock
Vice President

Mr. M. K. Barrett
Page 3 of 3

CCN: 008809

ADE/ctf

Attachment

cc:

Brown, N. R. w/a	DOE/ORP	H6-60
Burrows, C. w/o	BNFL Inc.	A208
Elsden, A.D. w/a	BNFL Inc.	A217
Erickson, L. w/o	DOE/ORP	H6-60
Fittro, C.T. w/o	BNFL Inc.	A212
Landry, W. w/o	BNFL Inc.	Fairfax
Lawrence, M. J. w/o	BNFL Inc.	A110
Morgan, S. w/a	BNFL Inc.	A116
PDC w/a	BNFL Inc.	K110
Short, J. w/o	DOE/ORP	H6-60
Smith, L. w/o	BNFL Inc.	H150
Smyser, L. w/a	PNNL	H6-61
Taylor, W. J. w/o	DOE/ORP	H6-60
Tooze, R. w/o	BNFL Inc.	Fairfax
Trautner, L. w/o	BNFL Inc.	A216
Turner, S. w/o	BNFL Inc.	A203

6 x's

WASTE INTEGRATION TEAM PROJECT (WIT)

George B. Mellinger, Program Manager

Kathy Cravens, PM Secretary

Doc. No. 008809

Receipt Date: 12-22-99

BNFL CORRESPONDENCE SUBJECT	WIT COPIES
Assistant Manager for Tank Waste Processing and Disposal	Mellinger
Audits/Inspections/Ext. Reviews - (cover only; no attachments)	Mellinger
Baseline Management - BNFL/PHMC Interface	Mellinger, Reynolds, Robershotte, Schmieman
Budget Obligation/Budget Authority	Weimar
Business/Finance BNFL Contract	Mellinger, Schmieman, Weimar
Configuration Management	Holter, Reynolds, Schmieman
Contract Negotiations	Mellinger
(BNFL) Contract Revisions/Final Drafts	Holbrook, Holton, Kovach, Lerchen, Mellinger, Reynolds, Ryder, Schmieman, Weimar, Wiemers
Contractor (Integration) Report	Reynolds
Cost/Price Analyst - BNFL Contract	Mellinger, Weimar
Data/Tank Inventory/Historical Data/Models	Holton, Kovach, Wiemers
Ecology Correspondence/DPD	Bengtson, Lerchen, Nickola
Envelope D Samples	Holton, Wiemers
External Reviews/ Evaluations/ Inspections	Holbrook, Nickola
Financial Modeling	Weimar
Hanford Advisory Board (HAB)	Bengtson, Nickola
High-Level Waste (HLW)	Holton, Kovach, Lerchen, Perez, Wiemers
HLW Steering Committee	Holton, Kovach, Ryder, Perez, Wiemers
HLW-Interim Storage	Holton, Kovach, Perez
HLAW - Interim Storage/Disposal Facility	Holton, Kovach, Perez
HLAW - Performance Assessment	Holton, Kovach, Perez
Integrated Product Teams (IPTs)	Holbrook, Holton, Kovach, Lerchen, Mellinger, Perez, Reynolds, Schmieman, Weimar, Wiemers
Interface Control Documents	Kovach, Lerchen, Perez, Reynolds, Wiemers
Low Activity Tank Waste Fraction	Holton, Kovach, Lerchen, Wiemers
Monthly Progress Report - BNFL	Bengtson, Brothers, Holbrook, Holton, Lerchen, Mellinger, Nickola, Reynolds, Robershotte, Schmieman, Weimar, Wiemers
OCRWM/Yucca Mountain Repository	Holton, Ryder, Perez
Operational Waste Volume Projections (OWVP)	Holton, Kovach, Wiemers
Permits, (Environmental, Air, Applications)	Holton, Lerchen
Private Financing - BNFL	Mellinger, Weimar
Privatization	Holbrook, Holton, Kovach, Mellinger
Privatization Alternatives/Analysis	Holbrook, Holton, Kovach, Mellinger, Robershotte, Triplett, Weimar
Privatization Contractors (See Attachment) BNFL	Mellinger
Privatization Cost Estimates	Mellinger, Weimar
Privatization Stakeholders	Bengtson, Nickola
Privatization Support Project Schedule	Schmieman
Privatization Public Involvement	Bengtson, Nickola
Process Waste	Holton, Kovach, Lerchen, Perez
Quality Assurance (including Audits)	Holton, Perez, Ryder
Regulatory Unit (Note: Any transmittal to or from Clark Gibbs)	Holton, Lerchen
Reviews & Inspections of BNFL	Holton, Mellinger, Schmieman
Risk Management	Brothers, Holbrook, Lerchen, Robershotte, Schmieman, Triplett
Safety Evaluation Report (SER)	Holton, Wiemers
Storage & Disposal Project/Immobilized Products Distribution	Holton, Perez
Safety Issues Management System (SIMS)	Robershotte
Test Plans/Procedures/Reports (from BNFL)	Holton, Kovach, Lerchen, Perez, Reynolds, Wiemers
TW04 - TWSOUP & Interfaces with PHMC/BNFL (ICD's)	Holton, Kovach, Lerchen, Perez, Reynolds, Wiemers
TPA M-30	Bengtson, Holton, Lerchen
TPA M-31	Bengtson, Holton, Lerchen
TPA M-60	Bengtson, Holton, Lerchen
TPA M-61	Bengtson, Holton, Lerchen
TPA M-90-20; 92-05	Bengtson, Holton, Lerchen
W-211	Reynolds
W-320	Kovach, Perez
W-464	Perez
W-465	Perez
W-520	Perez
Waste Acceptance Product Specification (WAPS)	Holton, Perez, Ryder, Wiemers
Waste Disposal Integration Team Project (WIT)	Mellinger
Waste Feed Delivery	Holton, Kovach, Perez, Wiemers, Mellinger, Hawkins
Waste Processing Responsibility	Holton, Kovach, Perez, Wiemers

Attachment 1
CCN 008809

Impact of TSCA Regulation

The impacts of TSCA were evaluated at a workshop on 12/6/99 with participants from Technical and Permitting (A. Elsdon, K. Boomer, S. Mackay, L. Bostic, D. Wanek). The impacts were generated under headings of Waste Characterization, Treatability Studies, Flowsheet, Permitting and Commissioning, Operations and Deactivation.

1. Waste and Product Characterization Impacts

- 1.1 The required limits of detection for PCB's will need to be lowered into the parts per billion range, current methods cannot achieve these levels.
- 1.2 More measurement points and analysis (feeds, intermediate stages, products and secondary wastes) will be required in the process and treatability studies to demonstrate behavior at PCB's.
- 1.3 In order to establish a flowsheet basis, a series of new active samples of sufficient volume for characterization from DOE would be required to give confidence in source term.

2. Treatability Study Impacts

- 2.1 Potential risk of current subcontractors being unable to handle TSCA materials without additional Permit requirements. (e.g. Pilot Melter cannot accept TSCA Regulated feeds).
- 2.2 Additional work required to establish behavior of PCB's in our process (e.g. Ion Exchange fouling, ultrafilter fouling and behavior in Joule Ceramic Melters). This would need rework of some of the simulant and active sample tests to obtain basic data.
- 2.3 Additional work required to demonstrate that the equipment selected can achieve the required 99.9999% destruction efficiency compared to the current 99.99%.
- 2.4 Increased costs of working with PCB's due to analytical requirements and cost associated with disposing of secondary wastes.

3. Flowsheet/Design Impacts

- 3.1 HLW melter off gas would likely require a secondary combustion unit capable of achieving a minimum 2 second residence time and 1200° C exit temperature. The location of such a unit could be either in a new secondary off gas cell or in a separate facility depending upon detailed analysis of the safety, operability and maintainability of cost of various options particularly arising from the need for an additional feed source.
- 3.2 LAW melter off gas might require similar provisions to HLW unless data can be generated to show that PCB's remain with solids and are routed to HLW.

3.3 Changes to the acceptance criteria for DOE provided services (solid and liquid wastes) would be required to avoid the need for additional waste treatment i.e. down stream facilities for Radioactive/Dangerous liquid effluents, non radioactive/non dangerous liquid effluents and solid wastes would need TSCA permits. The majority of PCB's entering RPP-WTP would be captured in evaporator overheads and scrubber liquors and routed to DOE as liquid effluent.

4. Permitting Impact

- 4.1 The format and content of a joint TSCA/RCRA permit could be very similar to that required under RCRA. BNFL Inc.'s Advanced Mixed Waste Treatment Facility Project (AMWTP) in Idaho is currently applying for a permit under a joint RCRA/TSCA permit application.
- 4.2 The requirements for addressing air emission related concerns in the permit may be affected (i.e., there could be an increased need to resolve emission concerns in the RCRA/TSCA permit rather than deferring the bulk of discussion to permits under the Clean Air Act.)
- 4.3 Negotiations with the EPA Regional regulating agencies would be required, specifically regarding secondary combustion and combustion efficiency monitoring and the need for an expedited review process.
- 4.4 Since vitrification is not one of the approved thermal treatment technologies for treating PCB wastes regulated under TSCA, a special case determination could be required. This determination could be made through approval of the joint permit.
- 4.5 Risk Assessment Work Plan would need to address higher PCB's in feed system.
- 4.6 Impact on NEPA requirements and EIS impact needs DOE assessment.

5. Commissioning, Operations and Deactivation

- 5.1 Additional TSCA specific commissioning and performance test may be required.
- 5.2 Plant availability reduced due to more complex off gas systems (control, maintenance/replacement). May take longer to process minimum order quantities.
- 5.3 Additional operator training and record keeping required.
- 5.4 Deactivation likely to take longer and deactivation wastes more costly to dispose.

The cost, schedule and risk impact for each of the above items has been addressed using best judgement available on a limited amount of information. The data resulting is given in Table 1.

Table 1 Impact of TSCA on RPP-WTP

Item	Impact	Part B1			Part B2		
		Basis	Cost (\$M)	Schedule (months)	Basis	Cost (\$M)	Schedule (months)
1	Waste and Characterization Impacts	Allow for 5 samples Each sample @ \$0.75M	\$3.8	6	10 tanks to be characterized @ 2 samples/tank x \$0.75M/sample	\$15.0	
2	Treatability Study Impacts	Repeat B1 Estimated at 50% of B1 estimate	\$25.0	12	10 samples @ \$2M/sample for active trials	\$20.0	
3	Flowsheet/Design Impacts	LOE @ 8 FTE x 18 mos x 15k/mo = 2,160k Additional design costs 150,000 hrs x \$80 = \$12,000k	\$14.2	0	Impact on capital costs - Combustible Unit (allow) = \$100M x 2 - Process/Facility Impact = \$100M x 2	\$400.0	
4	Permitting Impact	6 FTE for 12 mos. X 12k/mo = 864k 2 FTE for 18 mos. X 15k/mo = \$540k Reproduction, publications = \$100k Consulting services - allow = \$500k	\$2.0	0	Maintain permit over 10 years 2 FTE for 120 mos. X 15k/mo = \$3,600k Allow for associated costs = \$400k	\$4.0	
5	Commissioning, Operations and De-commissioning	Not Applicable	\$0.0	0	Add'l commissioning for 3 mos. @ 10% of facility estimate Additional year of operation due to reduced plant availability Deactivation - add'l 1 year @ 80% of current estimate	\$2.5 \$100.0 \$40.0	3 12 12
6	Cost Associated with running RPP-WTP	18 months @ \$3M/month	\$54.0	0			
	Net Cos. Impact	Impact on B1	\$99.0	18	Impact on B2	\$581.5	27

Notes: Pre-conceptual cost estimate

Ref: CCN 008653, Letter from M. Barrett, DOE/ORP, to M. Lawrence, BNFL, dated November 29, 1999.

U.S. Department of Energy

Office of River Protection

P.O. Box 450

Richland, Washington 99352

99-DPD-063

NOV 29 1999

Mr. M. J. Lawrence, General Manager RPP-WTP
and Executive Vice President
BNFL Inc.
3000 George Washington Way
Richland, Washington 99352

Dear Mr. Lawrence:

**CONTRACT NO. DE-AC06-96RL13308 - EVALUATION OF PROJECTED IMPACTS
FROM POTENTIAL TOXIC SUBSTANCES CONTROL ACT (TSCA) REGULATION OF
FEED**

As Hanford Site cleanup activities move forward, the site contractors are discovering unanticipated Polychlorinated Biphenyls (PCBs) in many areas. While BNFL Inc.'s (BNFL) contract does not include processing TSCA regulated waste feed, the U.S. Department of Energy (DOE) would like to understand the cost, price, and schedule impacts to the BNFL facility should tank waste feed be regulated under TSCA at some point in the future.

BNFL is requested to evaluate cost, price, and schedule impacts of accepting tank waste feed, for treatment and immobilization, regulated under the TSCA, in addition to the Atomic Energy Act and The Resource Conservation and Recovery Act. The evaluation of cost, price, and schedule impacts shall consider: (a) any physical plant modifications and/or additions required to process tank waste feed regulated under TSCA; (b) any process modifications and/or additions required to process tank waste feed regulated under TSCA; (c) administrative requirements related to the implementation of TSCA (e.g. reporting, recordkeeping, permitting, logkeeping, etc.); and (d) any impacts to primary and secondary waste streams and their treatment and disposal.

The results of the evaluation shall be provided to DOE in a letter report and include the following:

- Summary description of any physical modifications/additions to the River Protection Project (RPP) Waste Treatment Plant (WTP) necessary to support treatment of TSCA regulated tank waste;
- summary description of any process modifications/additions to the WTP;
- summary description of any additional administrative requirements driven by TSCA over current regulatory baseline or the WTP;
- projected differential capital cost;

Mr. M. J. Lawrence
99-DPD-063

-2-

NOV. 29 1999

- projected differential in operating cost, on an annual and cumulative basis;
- projected differential in financing/fee cost; and
- projected differential in design, construction, and operation schedules from baseline.

Results of the evaluation and a price proposal should be provided to DOE by December 15, 1999. The total effort for this activity should not exceed \$100K. Upon a negotiated price, DOE will adjust the \$250M Part B-1 ceiling appropriately prior to the end of Part B-1. Additionally, this effort shall not impact BNFL's ability to meet Part B-1 requirements. If, in BNFL's opinion, this effort will impact Part B-1 performance of base scope, please notify me immediately.

Sincerely,



Michael K. Barrett
Contracting Officer

DPD:LAH

cc: C. Burrows, BNFL
G. B. Mellinger, BNFL