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Meeting Minutes Transmittal/Approval
Hanford Project Managers' Meeting
Richland, Washington
August 30, 1995

From/ Appvl.: Paul F. X. Dunigan Jr. Date: 9/27/95
P. F. Dunigan, RL
Hanford Project Manager

Appvl.: Douglas R. Sherwood Date: 9/27/95
Douglas R. Sherwood, EPA
Hanford Project Manager

Appvl.: Roger F. Stanley Date: 7-27-95
Roger F. Stanley, Ecology
Director, Tri-Party Agreement Implementation

Prepared by Appvl.: Frank T. Calapristi Date: 7/27/95
Frank T. Calapristi
Westinghouse Hanford Company

DISTRIBUTION

L. D. Arnold	WHC
J. M. Augustenborg	RL
S. E. Bullard	RL
A. L. Bunn	MACTC
F. T. Calapristi	WHC B2-35
J. M. Clark	RL
P. F. Dunigan	RL A5-15
G. R. Eidam	BHI
B. L. Foley	RL
R. F. Guercia	RL
R. S. Hajner	BHI

D. E. Jackson
P. S. Kube
D. R. Sherwood
R. F. Stanley
R. K. Stewart
T. K. Teynor
H. T. Tilden
M. W. Wells
J. H. Zeisloft
EDMC

RL	
RL	
EPA	B5-01
ECO	Olympia
RL	
RL	
PNL	
WHC	
RL	
WHC	H6-08



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Hanford Project Managers' Meeting
August 30, 1995

Project Managers (PMs): Doug Sherwood, Roger Stanley, Paul Dunigan
WHC Tri-Party Agreement Integration: Larry D. Arnold
Recorder: Frank T. Calapristi

1. Open Action Items (+ F. Calapristi)

The Open Action Items were reviewed and updated by the TPA Project Managers (Attachment 1).

2. Public Involvement (+ D. Faulk, L. Davies/telecon)

Dennis Faulk (EPA) reported the TWRS Monthly Briefing to the stakeholders was scheduled for Wednesday, September 6 at the Richland Tower Inn. The agenda will cover TWRS and M-33-00 topics.

The TWRS Quarterly (Public Involvement) meeting was proposed for Thursday evening, September 7, 1995. The attendance would consist of the HAB representatives, committee chairs and the general public. No final decision was made to have the meeting although it was noted quarterly meetings are required by TPA paragraph 10.5.1.

Revision of the Community Relations Plan (CRP) was discussed. Dennis and L. Davies (Ecology) recommended an October 9 date to go out for public comment on the revised CRP. Prior to this date, proposed changes to the CRP would then be submitted to the HAB on September 22. The "End of Comment" period is scheduled for November 22 and the CRP will be issued on January 4, 1996.

The final topic for discussion was the retention of documents in the Public Information Repository (PIR). Dennis Faulk said the Public Information Officers (PIO's) will develop a guidance which may be included in the revised CRP.

3. M-19-00 & M-33-00: Status of Changes and Planned Actions
(+ J. Augustenborg, and R. Guercia)

Jay Augustenborg (RL) opened the discussion on M-33-00 (Attachment 2A).

The Agreement in Principle (AIP) was reviewed which required agreement on new milestones by 3/31/96. Jay also reviewed the RL plan to meet this schedule as affected by the HAB. However, after a short discussion, it was agreed by the three agencies the original schedule will be followed by RL.

RL will make a M-33-00 presentation to the HAB on September 6, 1995.

R. Guercia (RL) led the discussion on the M-19-00 milestone and distributed a copy of a draft Change Request M-19-94-02 which was sent to EPA and Ecology (Attachment 2B). RL then reviewed the details of the change request. Moses Jaraysi (Ecology) suggested several changes to the language which RL will include or consider in a revised change request.

4. Change Requests

- M-41-95-03:

(There was no discussion on this topic since the change request was previously approved by the three parties.

- Discussion of C-95-01:

Roger Stanley opened the discussion and described the State's concern in getting the waste from the 100-HR-1 and 100-DR-1 Operable Unit's (OU's) into ERDF. Ecology agreed with the Change Request to redesignate the OU's from RCRA to CERCLA but recommended a change in language. Ecology then distributed a revised change request for RL and EPA evaluation (Attachment 3).

5. 200-BP-11 Potential Dispute (+B. Foley)

Bryan Foley (RL) opened the discussion and reported RL had received a July 20, 1995 Ecology letter stating RL had missed the M-20-36 milestone. The Ecology position was based on their opinion that the work plan did not have an adequate schedule.

There was a moderate discussion on what schedule requirements are necessary to complete a Work Plan. No consensus was reached by the parties. Bryan Foley will meet with N. Hepner (Ecology) to reach agreement on what constitutes a schedule.

6. M-35-00 Activity and Funding Status (+ S. Bullard)

Sue Bullard (RL) reported \$207K has been identified for FY 1996 data management support; which results in a \$80K shortfall but RL is continuing to work the problem. RL also stated no data management milestones are in jeopardy. RL raised a question about Ecology and EPA personnel infrequent usage of computer support services. Since these services are costly, is it practical to continue this level of support? An example is the \$1600/month for the T-1 Link to Lacey.

Roger suggested RL send a letter to Mike Wilson (Ecology) expressing their concerns. Ecology will provide a response at the September Project Managers Meeting.

7. Possible Facility Transition Impact from DOH "Notice of Correction" for 324 Building (+ H. Tilden)

Harold Tilden (PNL) reviewed the status and stated that PNL and DOH are expediting resolution of the "Notice of Correction" and the resulting "Notice of Construction." There will be no impact to any Facility Transition milestone.

8. Ecology Expectations for the TWRS Critical Path (+ J. Clark, M. Wells, F. Calapristi)

Frank Calapristi (WHC) opened the discussion and said this topic was originally put on the agenda to formalize an agreement between Ecology (T. Michelena) and RL, that it would not be necessary to run a critical path analysis of the TWRS baseline this October as required by the TPA. However, Since that point in time, it was learned that RL will run a Critical Path Analysis in October which will be based on the FY 1996 MPPP and assumes "privatization" will be authorized by DOE-HQ.

John Clark (RL) then proceeded to review the schedule for the TWRS MYPP review, Work Breakdown Structure, Organization for Schedule Integration and a detailed Program Summary Schedule (Attachment 4). RL will submit proposed changes, resulting from the Critical Path Analysis, to the regulators approximately on September 15, 1995. RL will officially submit the changes for review at the September 20, Salt Lake City Meeting.

The discussion concluded with Roger Stanley (Ecology) stating that RL is required to comply with the requirements of the TPA including Paragraph 102.

9. Columbia River Impact Assessment (+ R. Stewart, L. Gadbois, Dave Holland)

Bob Stewart (RL) distributed a status report (Attachment 5). Bob noted his emphasis will be on "Project Teamwork", and identified the team members. The results of the Technical Peer Review workshop, held on August 16 was then reviewed. Bob noted his satisfaction with the technical competence of the peer reviews.

It was noted some of the tribes and/or stakeholders requested additional Columbia River Assessments; however, it was recognized by the three parties some of these assessments will not be addressed because they are not part of the TPA or may be part of the Operable Unit Assessments.

A September 6, 1995 meeting is scheduled with the tribes to discuss the CRCIA Scope.

A follow-up meeting is scheduled for September 19 and 20 to define the project and revise the conceptual plan.

Dave Holland (Ecology) noted that after the scope and plan are finalized, we may require another study if "gaps" are identified after the initial scope and plan.

10. Revision to TPA Appendix F List (+ J. Zeisloft)

Jami Zeisloft (RL) reviewed the TPA requirements which requires all documents referenced in Appendix F of the TPA to be identified by a RL document number. Jami noted that WHC and BHI each have contractor procedures dealing with remediation activities and suggested that regulator acceptance of the workplans, which reference contractor procedures, may satisfy regulator concerns.

D. Sherwood (EPA) did not agree with the suggestion and noted that regulators are not part of the revision process for the workplans. After additional discussion between RL and EPA, the question was not resolved. J. Zeisloft (RL) suggested he will reinvestigate the issue with WHC and BHI and return to the project managers with an RL response.

11. Realignment of TPA Organizations and Integration Requirements

There was a brief discussion on this topic but there was agreement that a meeting should be scheduled between the members of the Interagency Management Integration Team (IAMIT) to discuss organization and roles of the parties. A meeting will be scheduled for September 6, 1995.

AGENDA

TRI-PARTY AGREEMENT PROJECT MANAGERS MEETING

WEDNESDAY, AUGUST 30, 1995

EPA CONFERENCE ROOM
MEDICAL DENTAL CENTER

- 12:30 pm REVIEW OF OPEN ACTION ITEMS-- ATTACHMENT 1 (F. CALAPRISTI)
- o 5 Year Review / Review Progress of Three Parties
 - o TPA Article XL, Para. 122 Changes / (R. Stanley)
- 12:45 pm PUBLIC INVOLVEMENT
(J. YERXA, D.A. FAULK, L.DAVIES, P.BENGTSON)
- o TWRS Monthly Briefings to the Stakeholders
 - o TPA Quarterly Meetings
 - o Revision of the "Community Relations Plan"
 - o Retention of PIR Documents
 - o M-33-00 Public Involvement Activities
- 1:30 pm M-19-00 & M-33-00: STATUS OF CHANGES AND ACTIONS REQUIRED
(R.STANLEY, P.DUNIGAN, D.SHERWOOD, J.AUGUSTENBORG, R.GUERCIA)
- 2:15 pm CHANGE REQUESTS
(P. DUNIGAN, R. STANLEY, D. SHERWOOD, R. MORRISON)
- o Approval
 - o M-41-95-03: Modify scope of M-41-12
 - o Discussion
 - o C-95-01: Change of OU Designation (RPP & CPP)
- 2:30 pm BREAK
- 2:45 pm 200 BP-11 POTENTIAL DISPUTE
(P. DUNIGAN, R. STANLEY, D. SHERWOOD, B. FOLEY, S. HAJNER)
- 3:15 pm M-35-00 ACTIVITY AND FUNDING STATUS
(R.STANLEY, P.DUNIGAN, D.SHERWOOD, S.BULLARD, F.CALAPRISTI)
- 3:30 pm POSSIBLE FT IMPACT FROM DOH "NOTICE OF CORRECTION" FOR BLDG 324
(P. DUNIGAN, R. STANLEY, D. SHERWOOD, H. TILDEN)
- 4:00 pm ECOLOGY EXPECTATIONS FROM THE TWRS CRITICAL PATH
(P. DUNIGAN, R. STANLEY, D. SHERWOOD, F. CALAPRISTI)
- 4:15 pm STATUS OF COLUMBIA RIVER IMPACT ASSESSMENT
(R. STANLEY, P. DUNIGAN, D. SHERWOOD, R. STEWART, R. BRICH)
- 4:45 pm REVISION TO TPA APPENDIX F LIST
(P. DUNIGAN, R. STANLEY, D. SHERWOOD, J. ZEISLOFT, F. CALAPRISTI)

- 5:00 pm FY 96 PROJECT MANAGERS MEETING SCHEDULE
(P. DUNIGAN, R. STANLEY, D. SHERWOOD, F. CALAPRISTI).
- 5:10 pm REALIGNMENT OF TPA ORGANIZATIONS AND INTEGRATION REQUIREMENTS
(R. STANLEY, P. DUNIGAN, D. SHERWOOD)
- o Single Regulator Concept
 - o Coordination between the PM and IAMIT
- 5:45 pm ADJOURN

ATTENDEES

TPA PROJECT MANAGERS MEETING

AUGUST 30, 1995

EPA CONFERENCE ROOM
MEDICAL DENTAL CENTER

<u>NAME</u>	<u>ORGANIZATION</u>	<u>MAILSTOP</u>	<u>(✓) FOR ATTACHMENTS</u>
<u>FRANK CALAPRISTI</u>	<u>WHC/TPAI</u>	<u>B2-35</u>	<u>✓</u>
<u>Paul Dungen</u>	<u>DOE-RL-EAP</u>	<u>A5-15</u>	<u>✓</u>
<u>DALE JACKSON</u>	<u>RL/EAP</u>	<u>A5-15</u>	
<u>Tom Teynor</u>	<u>DOE/RL/WPD</u>		
<u>PAUL KUBE</u>	<u>DOE-RL-EAP</u>	<u>A5-15</u>	
<u>Jay Augustenberg</u>	<u>DOE-RL ^{WPD} SA</u>	<u>S755</u>	
<u>Rudy Guzman</u>	<u>DOE-RL LOAN</u>	<u>S755</u>	
<u>R. SCOTT HAZEN</u>	<u>BHI</u>	<u>H4-79</u>	
<u>James Zeisloff</u>	<u>DOE/RL/EAP</u>	<u>H4-83</u>	
<u>Greg Eidan</u>	<u>ERC</u>		
<u>Susan Bullard</u>	<u>RL-SID</u>		<u>✓</u>
<u>Bryan Foley</u>	<u>DOE-RL</u>	<u>H4-83</u>	
<u>Harold Tiddem</u>	<u>PNL/ECD</u>	<u>P7-79</u>	
<u>Jon Clark</u>	<u>DOE-RL</u>	<u>S7-54</u>	

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ATTENDEES

TPA PROJECT MANAGERS MEETING

AUGUST 30, 1995

**EPA CONFERENCE ROOM
MEDICAL DENTAL CENTER**

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(ATTACHMENT 1)

Open Action Items
Project Managers Meetings

1. The Five Year Review of the TPA is due and was discussed by the Project Managers. A response is required from the Project Managers to close out this action item. (May 26, 1994)

Resp: K. M. Thompson
R. Stanley
D. Sherwood

Due: March 30, 1995

Status: Ron Morrison, (WHC) distributed a draft document which included all received inputs (attachment 1A). EPA accomplishments need to be identified and will be included with the RL input (attachment 1B). When the EPA input is received, a consolidated document will be prepared by WHC.

2. Revise TPA Article XL, Paragraph 122 to clarify process and intent of signed and unsigned change requests and the start of the 14 day response period. (November 22, 1994)

Resp. R. Stanley
D. Sherwood
K. M. Thompson

Due: March 30, 1995

Status: Ron Morrison (WHC) distributed a draft of the proposed changes to Paragraph 122 (attachment 1C). Roger Stanley (Ecology) said the proposed changes will have to be modified. Roger had a concern about how "modifications" would be handled under this proposed language.

The project managers reported at the August meeting that this item has been resolved and will be part of TPA Amendment 6. This action item is completed.

F. T. Calapristi
Status date: August 30, 1995

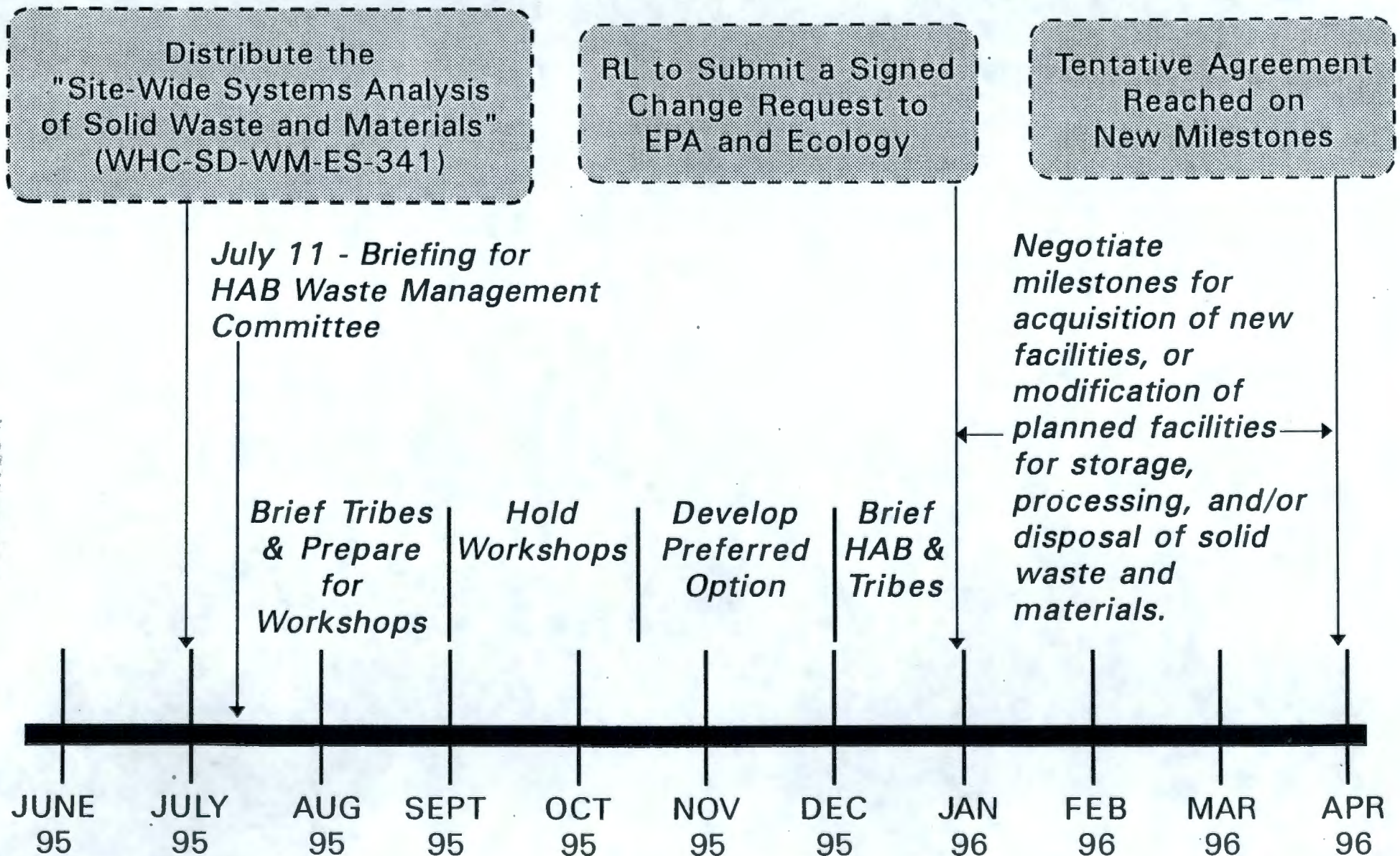
TPA Milestone M-33

Submit a DOE-signed change package for acquisition of new facilities, modification of existing facilities, or modification of planned facilities for storage, processing and/or disposal of SOLID WASTE AND MATERIALS based upon the results of the "Site-Wide Systems Analysis."

MILESTONE M-33 AS AMENDED BY AGREEMENT IN PRINCIPLE

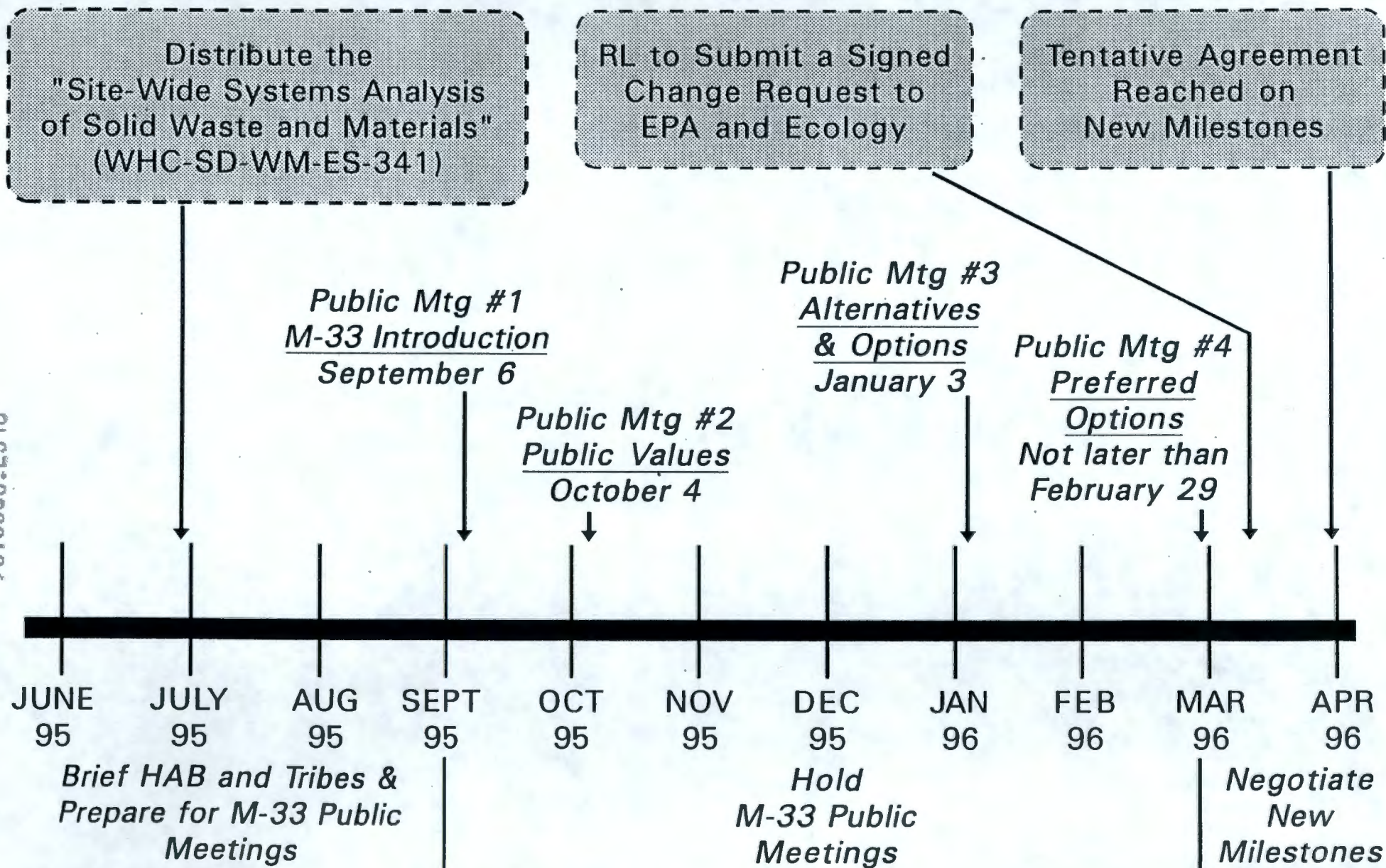
- **Issue “*Solid Waste and Materials Systems Alternatives Study*”:
June 30, 1995 (Complete)**
- **DOE-RL to Submit a Signed TPA Change Request to EPA and
Ecology: December 31, 1995**
- **Reach Agreement on New Milestones:
March 31, 1996**

TPA Agreement In Principle



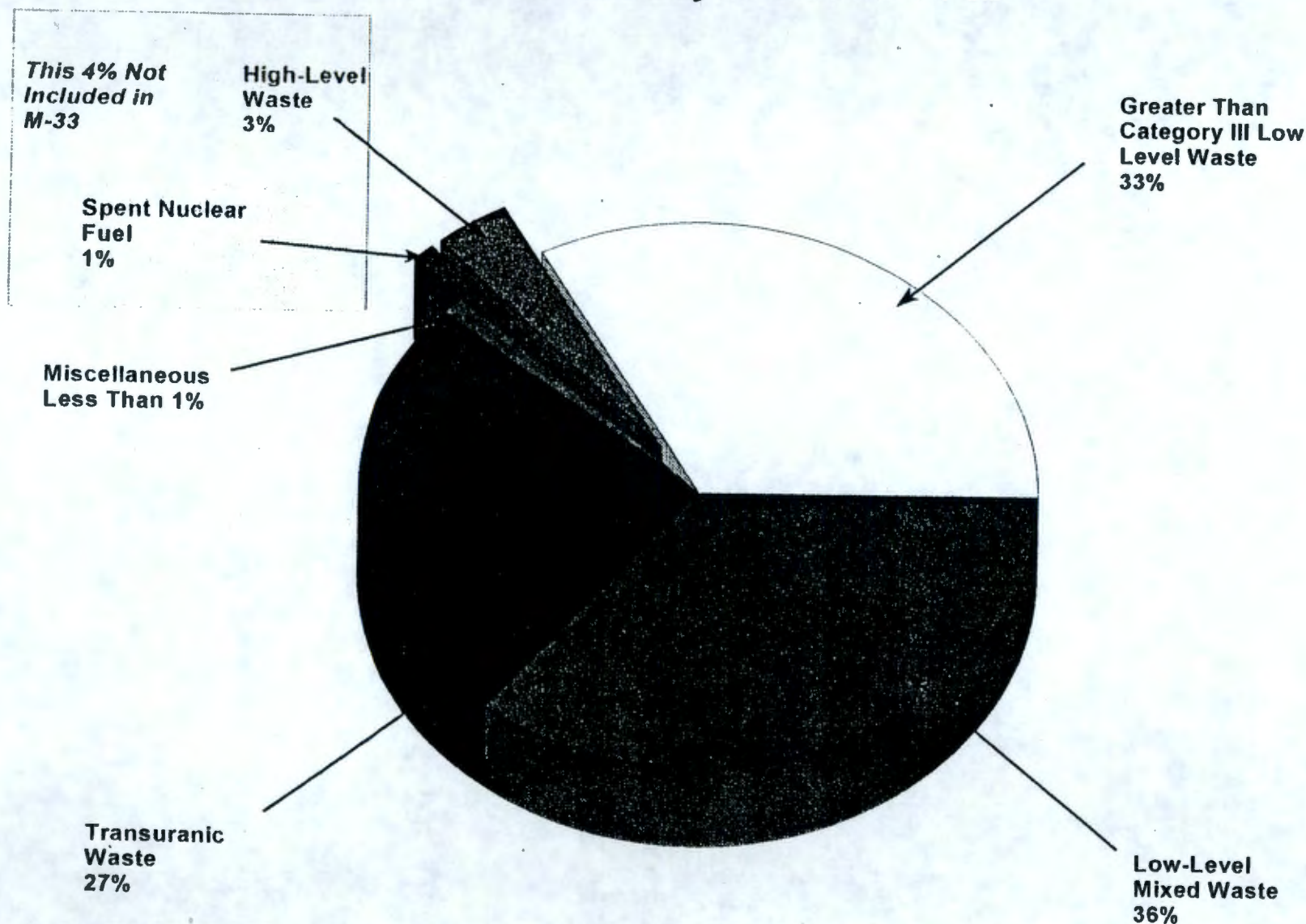
TPA Agreement In Principle

PROPOSED SCHEDULE



HANFORD SOLID WASTE AND MATERIAL VOLUMES

96% of All Hanford Solid Waste and Materials
Are Addressed by Milestone M-33



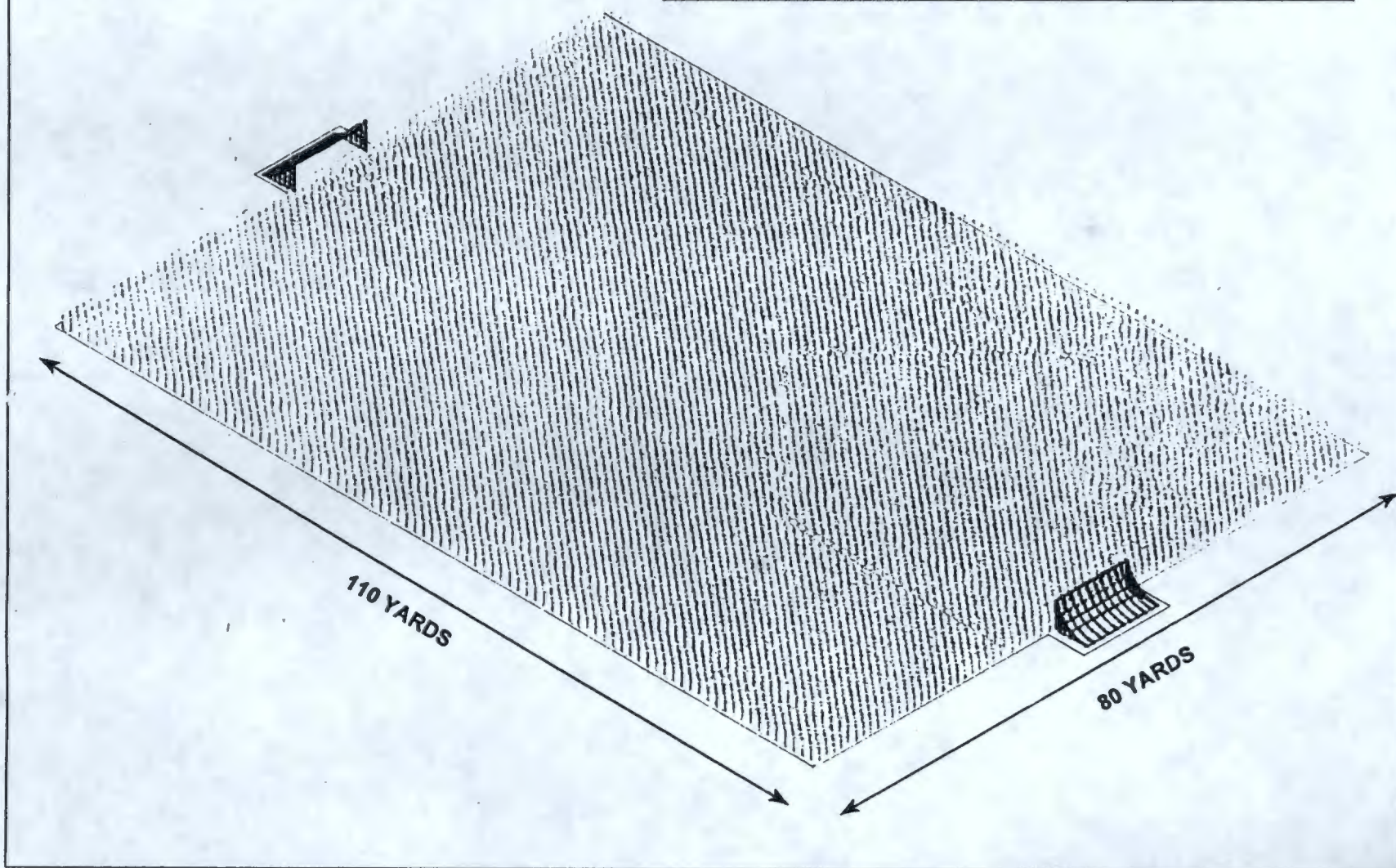
TOTAL VOLUME OF HANFORD
SOLID WASTE AND MATERIALS = 9,500,000 CUBIC FEET

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M-33 SOILD WASTE MATERIALS FILL 65 SOCCER FIELDS

19,800 55-GALLON DRUMS FILL ONE SOCCER FIELD



TREATMENT, STORAGE, AND DISPOSAL SOLID WASTE AND MATERIALS CURRENT PLANNING BASELINE

WASTE STREAMS AND MATERIALS	STORAGE PRIOR TO PROCESSING	PROCESSING	STORAGE PRIOR TO DISPOSAL	DISPOSAL/ FINAL DISPOSITION
UNIRRADIATED URANIUM				
Unirradiated Uranium	Not Required	Not Required	UO ₃ Plant and 300 Area Warehouse (M-33)	Commercial Sale and/or LLW Burial Grounds
CESIUM AND STRONTIUM CAPSULES				
Strontium and Cesium Capsules	Waste Encapsulation and Storage Facility (WESF) or Canister Storage Building (CSB) (M-33)	WESF or Tank Waste Remediation System (TWRS) High-Level Waste Vitrification (M-33)	WESF or CSB (M-33)	Offsite Repository
MISCELLANEOUS MATERIALS				
FFTF Sodium	FFTF Sodium Storage Facility (Ongoing TPA Negotiations)	400 Area Sodium Reaction Facility (Ongoing TPA Negotiations)	TWRS (Ongoing TPA Negotiations)	TWRS
Hallam and Sodium Reactor Experiment (SRE) Sodium	2727-W Building and Alkali Metal Storage Modules (M-33)	TBD (M-33)	Commercial Use or TWRS (M-33)	Commercial Use or TWRS
Special-Case Waste (SCW) and Special-Case Mixed Waste*	SCW Storage Facility (M-33)	TBD (M-33)	TBD (M-33)	Waste Isolation Pilot Plant (WIPP) for RH TRU. Requirements for Remainder Not Specified
SPENT NUCLEAR FUEL (Interface Only)				
K Basins	CSB (M-34)	SNF Conditioning Facility (M-34)	CSB (M-34)	Offsite Repository
T Plant	TBD	Not Required	TBD	Offsite Repository
300 Area Laboratories	TBD	Not Required	TBD	Offsite Repository
200 Area (Buried)	TBD	TBD	TBD	Offsite Repository

* Wastes from 300 Area Radiochemical Engineering Cell Operations

ASSUMPTIONS

Disposal:

- Waste Isolation Pilot Plant (WIPP) Will Accept All Remote-handled TRU, Beginning in 1998.
- Mixed Waste Disposal Trenches #31 and #34 Are Available to Accept LLMW.
- Off-Site Repository Will Be Available to Accept Spent Nuclear Fuel, Strontium/Cesium Capsules, and High-level Waste Canisters.

Wastes and Materials Not Addressed by M-33 Study:

- Waste Streams and Materials Addressed in Other TPA Milestones.
- Nonregulated Waste Streams and Materials (i.e., Low-Level Waste and Weapons Grade Materials) Managed Outside of the TPA.
- Waste Streams Without a Record of Decision (Pre-1970 Buried TRU and TRU Contaminated Soil).

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**TREATMENT, STORAGE, AND DISPOSAL
SOLID WASTE AND MATERIALS
CURRENT PLANNING BASELINE**

WASTE STREAMS AND MATERIALS	STORAGE PRIOR TO PROCESSING	PROCESSING	STORAGE PRIOR TO DISPOSAL	DISPOSAL/ FINAL DISPOSITION
HIGH-LEVEL WASTE				
High-Level Waste Canisters	Tank Farms	Privatized High-Level Vitrification (M-51)	Canister Storage Building (CSB) or At/Below Grade Storage in 200 Area (M-33)	Offsite Repository
Low-Level Vitrified Waste	Tank Farms	Privatized Low-Level Vitrification (M-50)	TBD	LLW Burial Grounds
TRU WASTE				
Remote-Handled	Limited Storage in Special-Case Waste (SCW) Storage Facility, Remaining Storage TBD (M-33)	TBD (M-33)	TBD (M-33)	WIPP
Large Container Contact-Handled	TBD (M-33)	TBD (M-33)	TBD (M-33)	WIPP
Small Container Contact-Handled	Central Waste Complex (CWC) and Transuranic Waste Storage Facility (TRUSF)	WRAP-1 (M-18)	CWC and TRUSF	WIPP
LLMW				
Remote-Handled	TBD (M-33)	TBD (M-33)	TBD (M-33)	Mixed Waste Disposal Trench
Large Container Contact-Handled	Limited Storage at CWC, Remaining Storage TBD (M-33)	TBD (M-33)	Limited Storage at CWC, Remaining Storage TBD (M-33)	Mixed Waste Disposal Trench
Small Container Contact-Handled	CWC	Privatized LLMW Processing and Thermal Treatment (M-19)	CWC	Mixed Waste Disposal Trench
GREATER THAN CATEGORY 3 LLW AND LLMW				
Remote-Handled	Limited Storage at SCW Storage Facility and CWC, Remaining Storage TBD (M-33)	Treatment Requirements Not Identified	Limited Storage at SCW Storage Facility and CWC, Remaining Storage TBD (M-33)	Disposal Requirements Not Identified
Contact-Handled	Limited Storage at CWC, Remaining Storage TBD (M-33)	Treatment Requirements Not Identified	Limited Storage at CWC, Remaining Storage TBD (M-33)	Disposal Requirements Not Identified



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

Mr. Chuck Clarke
Regional Administrator
U.S. Environmental Protection Agency
Region 10
1200 Sixth Avenue
Seattle, Washington 98101

Ms. Mary Riveland, Director
State of Washington
Department of Ecology
P.O. Box 47600
Olympia, Washington 98504-7600

Dear Mr. Clarke and Ms. Riveland:

DRAFT CHANGE REQUEST M-19-94-02: "REVISE M-19 MILESTONES TO ALLOW OPTIONS FOR COMMERCIAL TREATMENT OF SOLID LOW-LEVEL RADIOACTIVE MIXED WASTES"

The subject draft Class I Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) Change Request is being forwarded for your consideration.

The Change Request embodies a proposal to obtain stabilization treatment for certain low-level waste streams from the commercial sector by September 1999. This proposal would include the waste streams presently covered by the M-26 Milestone in the Tri-Party Agreement (TPA), and additional waste streams listed in the Site Treatment Plans prepared under the Federal Facility Compliance Act. The proposal also calls for ceasing present WRAP 2A design activities so that limited resources may be conserved.

The U.S. Department of Energy (DOE), Richland Operations Office's (RL) has had our contractor issue a Request for Proposal (RFP) for these services which will require that the services be available to initiate treatment by September 1999, so that no change is proposed to the current TPA Milestone date.

RL is also looking at other alternative treatment options for waste streams including those originally slated for WRAP 2A. RL initiated the formation of a team to look at waste streams that could be disposed in compliance with applicable regulations without any additional treatment. This team evaluated the waste streams for any environmental impacts that would result from direct disposal of the waste. The goal of this team was to reduce cost while still adhering to good environmental practices. Each mixed waste stream selected for direct disposal would require your agencies approval prior to implementation. In addition, RL is reviewing site facilities already in place that may be able to provide stabilization for certain mixed waste streams.

Mr. Clarke and Ms. Riveland
95-SWT-488

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DOE would appreciate any thoughts you might have on any other alternatives that will achieve our above goal.

If you or your staff have questions, please contact me, or Thomas K. Teynor, of the Waste Programs Division, on (509) 376-1366.

Sincerely,

John D. Wagoner
Manager

WPD:KDB

Enclosure:
Federal Facility Agreement and
Consent Order Change Control Form

cc w/encl:
L. Arnold, WHC
W. Hamilton, Jr., WHC
M. Jaraysi, Ecology
M. McLaughlin, WHC
D. Sherwood, EPA
R. Stanley, Ecology
J. Wallace, Ecology

Change Number DRAFT M-19-95-01	Federal Facility Agreement and Consent Order Change Control Form Do not use blue ink. Type or print using black ink.	Date 8/7/95
Originator T. L. Baker		Phone (509) 376-5681
Class of Change <input checked="" type="checkbox"/> I - Signatories <input type="checkbox"/> II - Project Manager <input type="checkbox"/> III - Unit Manager		
Change Title Revise M-19 Milestones to Allow for Alternate Treatment and Direct Disposal Options for Low Level Mixed Wastes		
Description/Justification of Change <p>This change request proposes an alternative to constructing and operating the WRAP 2A facility on the Hanford site. The revised strategy can employ several parallel paths to accomplish the WRAP 2A mission for treating Contact Handled Low Level Mixed Waste. The new milestones will require that waste treatment and/or direct disposal begin by the same date planned for WRAP 2A and continue at a rate that equals or exceeds the cumulative throughput previously planned for WRAP 2A. A new major milestone establishes this treatment/disposal rate as a requirement through Fiscal Year 2002.</p> <p style="text-align: right;">(Continued on next page)</p>		
Impact of Change <p>This change request creates a new major milestone (M-19-00) which sets specific requirements for treating and/or disposing of at least 1,644 cubic meters of Contact Handled Low Level Mixed Waste by the end of FY 2002. The previous major milestone, "Complete WRAP Module II Construction and Initiate Operations" is replaced by interim milestone M-19-01, which requires that treatment and/or direct disposal of waste be initiated by the same date, September 1999. The previous milestone M-19-01, "Complete WRAP Module II Construction" is deleted. Additional interim milestones and target dates are established for the treatment and disposal of Contact Handled Low Level Mixed Waste.</p>		
Affected Documents <p>Hanford Federal Facility Agreement and Consent Order, Fourth Amendment, January, 1994, Appendix D (Table D, pages D-41 and D-42, and Action Plan Work Schedule, page 13 of 40).</p>		
Approvals <div style="display: flex; justify-content: space-between;"> <div>DOE _____</div> <div>Date _____</div> <div>___ Approved ___ Disapproved</div> </div> <div style="display: flex; justify-content: space-between;"> <div>EPA _____</div> <div>Date _____</div> <div>___ Approved ___ Disapproved</div> </div> <div style="display: flex; justify-content: space-between;"> <div>Ecology _____</div> <div>Date _____</div> <div>___ Approved ___ Disapproved</div> </div>		

The new strategy can utilize several different approaches including:

- Contracts with commercial firm(s) to provide stabilization of Contact Handled Low Level Mixed Waste (CH-LLMW) on a fixed unit price basis. This contract will provide required treatment for all of the waste streams originally designated for WRAP 2A, except for four small waste streams which will constitute less than two percent of the CH-LLMW projected for treatment in WRAP 2A. These small streams will be treated on site using laboratory scale equipment and via a second commercial contract for treating high mercury subcategory waste.
- Onsite treatment in WRAP 1, 2706-T or another permitted TSD facility using macro-encapsulation and/or a small scale deactivation/stabilization capability. Certain waste streams, such as radioactive elemental lead and debris, will require Ecology/EPA concurrence with macro-encapsulation using sealed polyethylene containers. However, the commercial contract option can be utilized for any or all of these waste streams if regulator concurrence is not obtained or the commercial approach is determined to be more cost effective.
- Direct disposal of certain waste streams in compliance with applicable regulations, without any additional treatment. Three waste streams are candidates for this option. In each case additional sampling and analysis will be required to demonstrate that the streams meet LDR treatment requirements for disposal in the RMW landfill. Preliminary testing has shown that these streams, previously categorized as requiring additional treatment, will meet LDR. One of the streams, 183 H Basin Solidified Liquids, will require a variance for trace amounts of formic acid. This variance was also planned in order to treat 183 H Basin wastes in the WRAP 2A facility. Any of these waste streams that are found unsuitable for direct disposal will default to the commercial contract for treatment.
- In addition, additional contracts may be let for treatment services for small quantities of waste not within the scope of the WRAP 2A project

The revised M-19 milestones use the WRAP 2A treatment plan as a basis for the minimum volume of waste to be treated and/or disposed. The Functional Design Criteria document (WHC-SD-W100-FDC-001L2) established a WRAP 2A treatment throughput rate of 822 cubic meters per year. Facility implementation plans called for operating at 30% of capacity in the first year (FY 2000), 70% in the second, and 100% thereafter. Thus, the revised milestones are based upon annual treatment and/or disposal rates of 246 cubic meters in FY 2000, 575 cubic meters in FY 2001, and 822 cubic meters for FY 2002 and beyond until compliance is reached with the RCRA storage time limitation for land disposal restricted waste. The treatment and/or disposal requirements are stated on a cumulative basis as shown in Milestone M-19-00 below.

This new strategy is consistent with the site treatment planning approach prescribed by the Federal Facilities Compliance Act.

Revised Milestones

~~M-19-00 Complete WRAP Module II Construction and Initiate Operations 9/30/1999~~

~~The WRAP Module II will include waste treatment capabilities to minimize land disposal of Low Level Radioactive Waste and Radioactive Mixed Waste. The September 1999 completion date of WRAP Module II is critical to achieving compliance for the management of wastes that are prohibited from land disposal and extended storage. WRAP Module 2 will provide for treatment of secondary solid waste resulting from treated effluent disposal systems.~~

~~M-19-00 Treat and/or directly dispose of at least 1,544 cubic meters of Contact Handled Low Level Mixed Waste September 2002~~

~~Cumulative treatment and/or direct disposal rates will be 246 cubic meters by the end of FY 2000, 822 cubic meters by the end of FY 2001, and 1,544 cubic meters by the end of FY 2002. These treatment/disposal rates are contingent upon Ecology/EPA approval of the variance from treatment standards for formic acid per M-19-02 below.~~

~~M-19-01 Initiate Treatment and/or Direct Disposal of Contact Handled Low Level Mixed Wastes September 1999~~

~~Treatment and/or direct disposal of Contact Handled Low Level Mixed Waste will begin on or before September 30, 1999.~~

~~M-19-01 Complete WRAP Module II Construction 9/30/1998~~

~~M-19-01-T01 Complete the determination of the level of NEPA that will be required for commercial treatment contractor May 1996~~

~~M-19-01-T02 Award a commercial contract for stabilization of Contact Handled Low Level Mixed Waste July 1996~~

~~M-19-01-T03 Complete all NEPA requirements related to the commercial contract for stabilization of Contact Handled Low Level Mixed Waste September 1997~~

~~M-19-02 Obtain Ecology/EPA approval of treatment variance for 183H Basin formic acid September 1996~~

~~M-19-02A Submit petition to Ecology/EPA for variance from treatment standards for formic acid April 1996~~

~~This treatment variance for trace amounts of formic acid is required for both commercial treatment of 183H sludge and crystalline solids, and direct disposal of 183H solidified liquids. The variance was also required and planned for the WRAP 2A project. If the treatment variance is not granted, the 183H waste stream will require thermal treatment prior to stabilization and/or disposal.~~

~~M-19-03 Obtain Ecology/EPA decision regarding the acceptability of using macro-encapsulation of lead and debris using sealed polyethylene containers September 1996~~

~~M-19-03A Submit to Ecology/EPA the regulatory basis for using sealed polyethylene containers for macro-encapsulation of lead and March 1996~~

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debris

The macro-encapsulation approach using sealed polyethylene containers appears to comply with RCRA LDR requirements. This approach will permit the use of onsite facilities including WRAP 1, 2706-T or other permitted TSD facilities for treatment. If macro-encapsulation is rejected by the regulators, or the commercial approach proves more cost effective, the commercial option will be utilized.

M-19-04 Complete sampling and analysis to determine if the Backlog Soils meet LDR treatment standards and/or MTCA risk based concentrations December 1996

If additional sampling and analysis demonstrates that backlog soils meet MTCA risk based concentrations, they will be disposed in the LLW landfill. If the soils fail MTCA risk based concentrations, but meet LDR treatment standards, they will be disposed in the RMW landfill. Otherwise, stabilization using the commercial contract will be required before disposing of the soils.

M-19-05 Obtain Ecology/EPA acceptance of the existing solidification treatment of 183H Solidified Liquids as LDR treatment December 1996

M-19-05A Submit justification for accepting existing solidification treatment of 183H Solidified Liquids to Ecology/EPA July 1996

Ongoing sampling and analysis of the 183H Solidified Liquids indicates that the existing grouted waste form meets applicable RCRA stabilization treatment standards and all TCLP requirements. Additional sampling and analysis will be utilized to determine if the waste stream meets applicable standards for direct disposal to the RMW landfill.

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(ATTACHMENT 3)

Change Number C-95-01A	Federal Facility Agreement and Consent Order Change Control Form <small>Do not use blue ink. Type or print using black ink.</small>	Date 8/28/95 DRAFT
Originator Ecology		Phone
Class of Change [] I - Signatories [X] II - Project Manager [] III - Unit Manager		
Change Title Redesignation of 100-HR-1 and 100-DR-1 Operable Units (OUs) from RCRA past practice Units to CERCLA Past Practice Units.		
Description/Justification of Change This redesignation of 100-HR-1 and 100-DR-1 OUs from Resource Conservation and Recovery Act past practice (RPP) Units to Comprehensive Environmental Response, Compensation, and Liability Act past practice (CERCLA) Units is expected to facilitate disposal of past practice site remediation waste in the Environmental Restoration Disposal Facility (ERDF) in conjunction with accelerated OU cleanup adjacent to the Columbia River. This redesignation is for the express purpose of ensuring that past practice site wastes resulting from initial OU Records of Decision (ROD) are available for disposal at the ERDF as it becomes operational (scheduled for September 1996). This redesignation applies only to past practice sites within the OU's noted. Hazardous waste management units (RCRA TSD's) within these OU's will continue to be managed under the state's delegated RCRA program, and are not effected by this change request. Lead regulatory agency responsibility will remain with the Washington State Department of Ecology for these operable units.		
Impact of Change This change will not impact other OU's or TPA milestones.		
Affected Documents Hanford Federal Facility Agreement and Consent Order Action Plan, Appendix C		

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Approvals

_____ Disapproved	_____	_____ Approved
DOE	Date	

_____ Disapproved	_____	_____ Approved
EPA	Date	

_____ Disapproved	_____	_____ Approved
Ecology	Date	

p:thisone

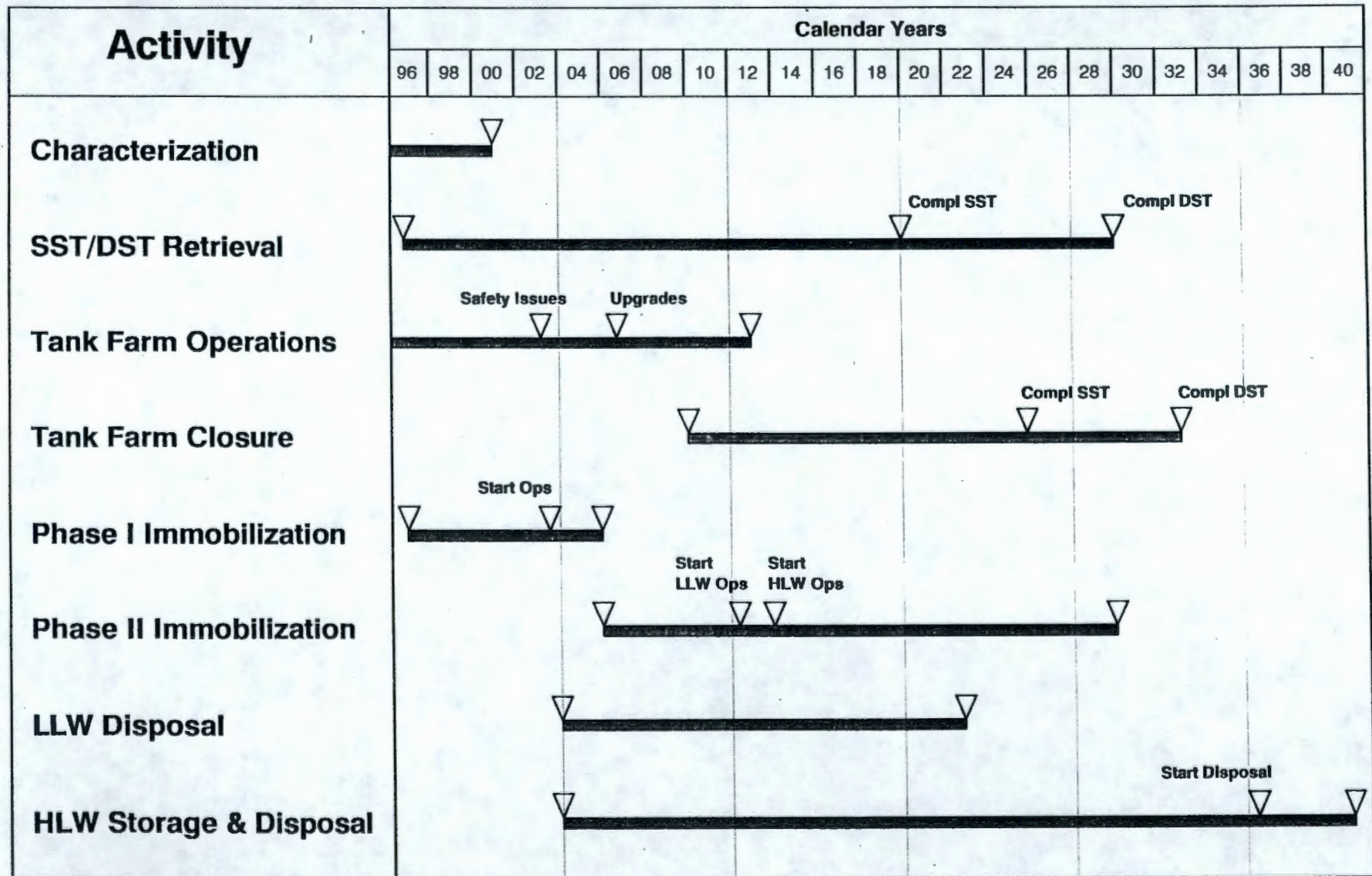
Tank Waste Remediation System Richland Operations Office



Multi-Year Program Plan Schedule Status Review
August 30, 1995

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Tank Waste Remediation System Program Summary Schedule



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FY 1996 MYPP BASES

- Implement RL-TWRS high-level schedule direction
- Maintain major TPA milestones
 - 2018 Complete SST Waste Retrieval
 - 2024 Complete SST Farm Closure
 - 2028 Complete Tank Waste Immobilization
- Ensure funding requirements are within IRB profiles
- Incorporate privatization of retrieval, pretreatment, and immobilization
- Incorporate projectization of all workscope

TWRS Program Work Breakdown Structure

WBS Level

II

Tank Waste Remediation System

III

Management Systems

Waste Storage

Waste Disposal

IV

Management
Systems

Waste
Characterization

Safety Issue
Resolution

Tank Farm
Operations

Waste
Retrieval

Low Level
Waste

High Level
Waste

Storage
& Disposal

V

Management
Systems

Waste
Characterization

Flammable
Gas

Waste Vol. Mgmt,
Recpt, Trans & Evap

SST
Retrieval

LLW Treat
& Immobilize

HLW Treat
& Immobilize

LLW Storage
& Disposal

Ferrocyanide
Gas

Transition 200E to
Cntrl, Cln & Stable

DST
Retrieval

HLW Interim
Storage

Organic &
Nox Vapors

Transition 200W to
Cntrl, Cln & Stable

Tank Farm
Closure

Cs & Sr
Capsules

High Heat &
Others

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MYPP Integrated Schedule

- Employs top-down planning
- Incorporates higher degree of integration due to projectization
- Identifies acceleration of TPA milestones due to privatization
- Supports assignment of project manager accountability
- Creates environment for application of project management techniques

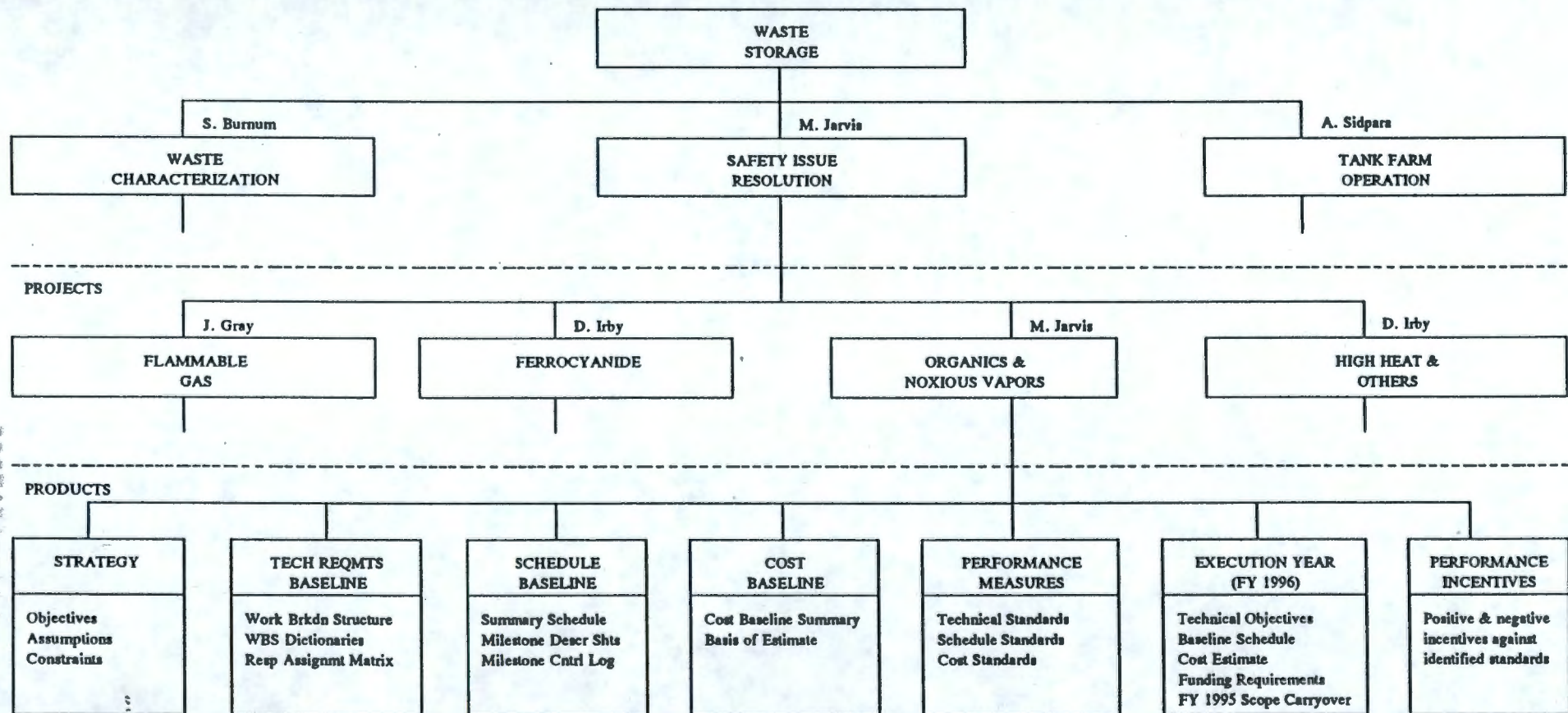
Tank Waste Remediation System

Program Summary Schedule

(Separate Handout)

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FY 1996 MYPP SCHEDULE INTEGRATION



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MYPP Integrated Schedule Challenges

- Effective use of integrated schedules as a project management tool.
- Effective integration of scheduling system with other RL systems
- Overcoming consequences of including privatization and funding reductions.

SUMMARY

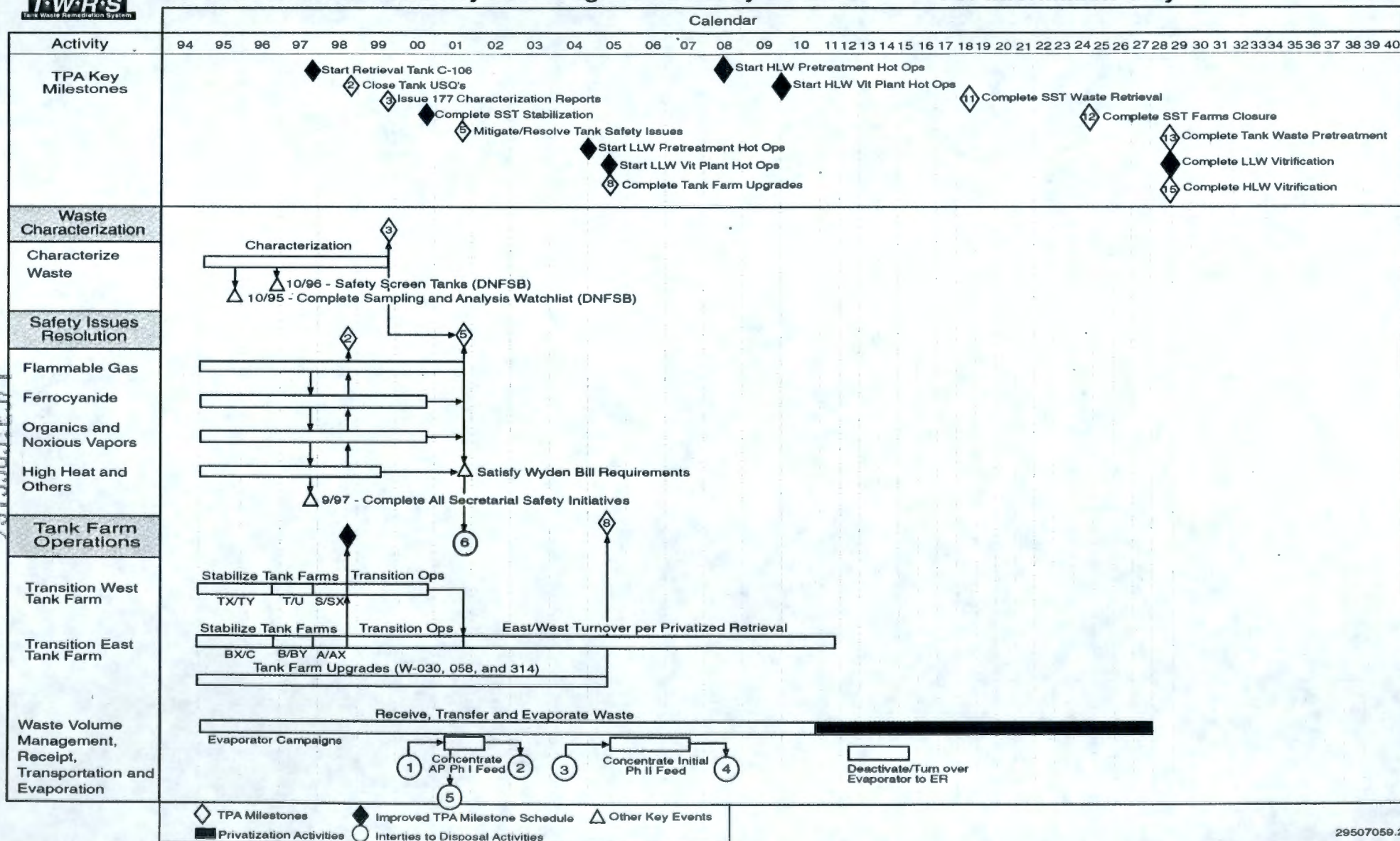
- Use current integrated schedule for balance of FY 1995
- Develop FY 1996 integrated schedule
 - Integrates all projects
 - Establishes new and meaningful critical path
 - Supports management reporting/decision-making
- Verify FY 1996 integrated schedule meets RL-TWRS requirements
- Identify interim milestone changes to regulators September 20
- Closely monitor project performance



Tank Waste Remediation System Program Summary Schedule

For Information Only

Draft

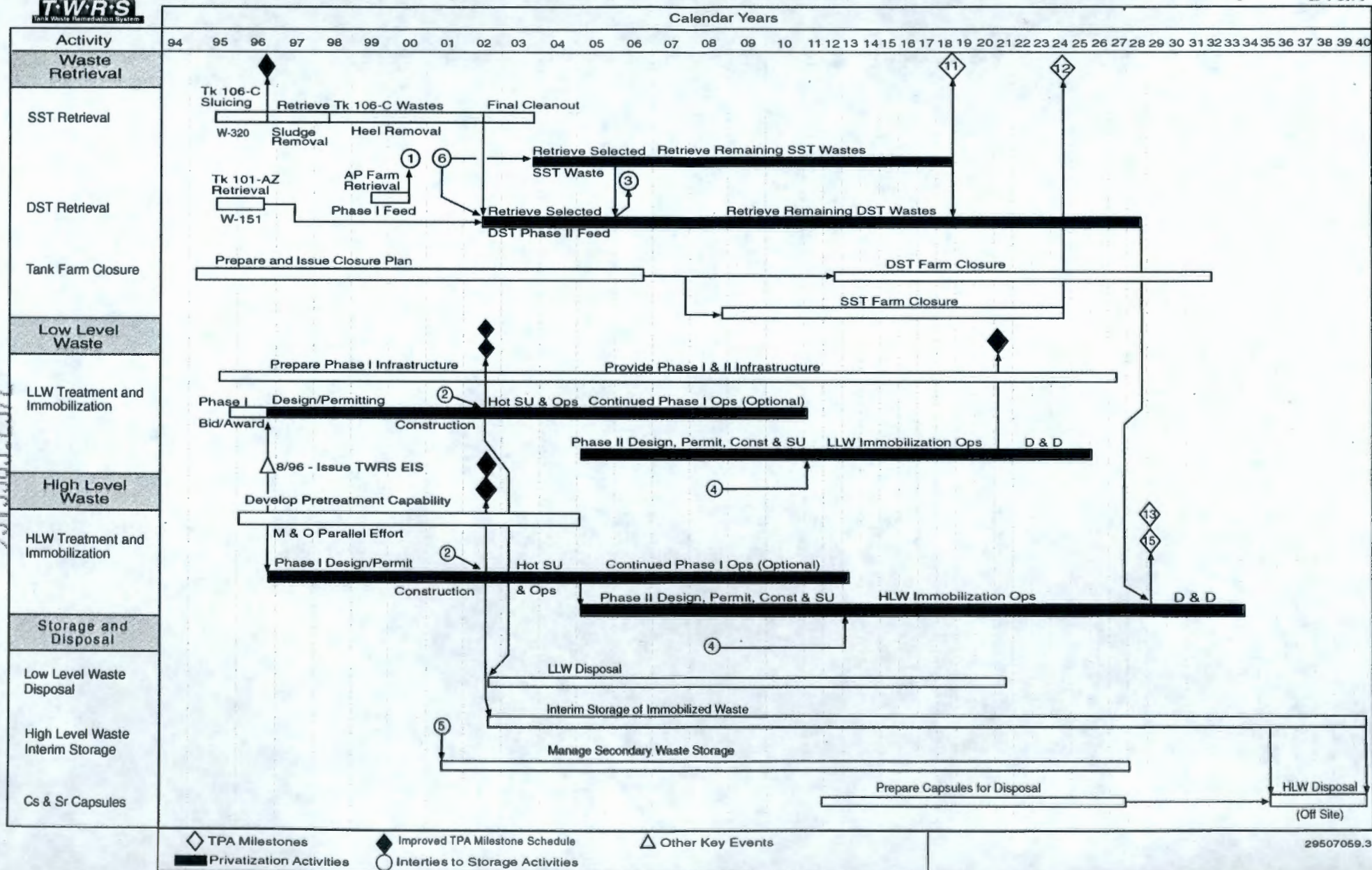




Tank Waste Remediation System Summary Schedule (continued)

For Information Only

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8/30/95

Columbia River Comprehensive Impact Assessment

Status update for TPA Project Managers
Bob Stewart, Larry Gadbois, Dave Holland

Accomplishment highlights (since last report to TPA PMs):

- Instituted Weekly CRCIA Project Team Mtgs
 - Team Members: Bob Stewart - DOE, Larry Gadbois - EPA, Dave Holland Ecology, Roger Dirkes - PNL, Sue Finch - PNL, Amoret Bunn - GSSC Support, Dick Biggerstaff - Bechtel
 - Added: J. R. Wilkinson - CTUIR, Tom Woods, YIN, Stan Sobczyk, (& Paul Danielson), NPT
 - Being Added: Ralph Pat - HAB (ER)/State of Oregon
- UMM Discipline (coordinated agendas, summary minutes, actions, etc)
- Conducted Technical Peer Review Workshop, August 16th
Summary Results:
 - 78 Attendees (19 organizations, excl Peer Reviewers)
 - strong tribal participation; vocal Columbia River United inputs
 - results mixed:

Positives:

- Peer reviewers did well, showed expertise, deflected conflict of interest Issue
- Indian tribes and others reacted favorably to noon decision to modify agenda to allow participant concerns to be heard by peer reviewers
- Favorable response to two initiatives announced at the workshop aimed at improving tribal participation:
 - 1) "Opening-up" of the CRCIA Project Management Team (Unit Manager Meetings) to include tribal representatives - on a trial basis
 - 2) Proposal to develop, in conjunction with the tribes, "Indian Involvement Plan" - for the CRCIA as a pilot project.

Negatives:

- Appearance of lack of direction - TPA intent to have workshop prior to agreement on scope not well understood, caused confusion, negative reaction of with peer reviewers, perception of DOE, Tri-Parties "as not having act together

- Continuing issue on lack of CRCIA comprehensiveness - Indian and Columbia River United participants again voiced need for more comprehensive study than that defined by the TPA milestone "driving" the CRCIA (not new, an especially difficult issue to resolve, based on limited funding available, extent to which science can address some of concerns, and because of expectations; word COMPREHENSIVE part of problem)

- Developed concept to address "lack of comprehensiveness" issue:

Propose to: add "framework element" which would define scope within the broader context of other Columbia River studies and efforts.

(For Example, to deal with the issue of future river contamination, a brief summary would be added of the work that Bechtel is performing to develop a groundwater remediation strategy for prioritizing potential remediation efforts on individual contaminated plumes.

- discussed in 8/29 CRCIA Project Team meeting (included tribal representatives), and generally regarded as an approach which could get the project past its present stage of disagreement.

- Conducted initial Project Management Team meeting with tribal representatives on August 29th. Results were:

- 1) general agreement on the "modus operandi" of the Team meetings
- 2) concept of addressing comprehensiveness agreed, subject to specifics
- 3) Agreement to "bring in" the Hanford Advisory Committee via participation of Ralph Pat (ER Subcommittee chair) who would also represent State of Oregon
- 4) Agreement to 1/2 day meeting 9/6 to try to come to agreement on CRCIA scope
- 5) Initiative to develop CRCIA Tribal Involvement Plan tabled
- 6) Agreement to go forward with "STIR" (9/19-20) Meeting

- Have addressed several project control, project integration, and coordinations issues

- PTS reporting, inclusion in FY 1996 Work Plan

- Sue Finch on board to perform project control, coordination function

- Dick Biggerstaff member of Team to improve Bechtel coordination

- Worked to keep Directors, peer reviewers "on board"

Upcoming/Issues: Scope discussions, WSU/OSU contract changes, revision to Draft Conceptual Plan, "start of technical work", STIR, etc