



## Department of Energy

Richland Field Office  
P.O. Box 550  
Richland, Washington 99352

9205225

JUL 30 1992

92-TPA-061

Mr. Paul T. Day  
Hanford Project Manager  
U.S. Environmental Protection Agency  
Region 10  
712 Swift Boulevard, Suite 5  
Richland, Washington 99352

Mr. David B. Jansen, P. E.  
Hanford Project Manager  
State of Washington  
Department of Ecology  
P.O. Box 47600  
Olympic, Washington 98504-7600



Dear Messrs. Day and Jansen:

HANFORD FEDERAL FACILITY AGREEMENT AND CONSENT ORDER CHANGE CONTROL FORM M-20-92-3, "MODIFY PUREX PLANT PART B PERMIT APPLICATION INTERIM MILESTONE M-20-24"

Enclosed for your review and approval is the subject Class II Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) Change Control Form. This Change Control Form was prepared to establish a new interim milestone for submittal of a Part B permit application or closure plan for the Plutonium-Uranium Extraction (PUREX) Plant in fulfillment of Tri-Party Agreement and Consent Order Interim Milestone M-20-24.

Interim Milestone M-20-24 presently requires that a Part B Dangerous Waste Permit Application for the PUREX Plant be submitted by September 30, 1992. In October of 1990, The Secretary of Energy, James D. Watkins ordered the PUREX Plant be placed in a standby condition pending issuance of the Irradiated Fuel Environmental Impact Statement Record of Decision. Since that time the mode of operation and the characteristics of the waste have changed and will continue to change as more of the plant is placed in cold standby. At the present time, transition to standby is nearly completed; however, future plans for the plant remain uncertain. During cold standby operations, it is anticipated that Tanks U3, U4, and F18 of those tanks identified in the Part A permit application, and in the Notice of Intent currently in process, will be used for the storage and treatment of dangerous waste.

It is very difficult to anticipate what equipment and/or processes may be necessary to properly manage the waste that may be handled in the future at the plant. Until a decision is made regarding future operating plans for final shutdown conditions for the PUREX Plant, preparation and submittal of a



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Part B permit application as presently outlined in Milestone M-20-24 is not considered practical. Without better definition of the future uses of the PUREX Plant, the U.S. Department of Energy, Richland Field Office (RL) does not feel that a true, accurate, and complete application covering regulated activities for future activities at PUREX can be prepared. Therefore, any application submitted earlier than 1995 would likely be insufficient. If the decision is made to permanently close the PUREX Plant RL would have to develop a closure strategy that would ensure that other necessary activities that may require use of PUREX facilities, such as closure of the PUREX Tunnels could also be accomplished.

The enclosed Change Control Form provides a new interim milestone to submit a Part B permit application or closure plan for the PUREX Plant by July 1995. The date of July 1995, is predicated on the anticipation of eventual closure of the plant, and the need to complete definition of required plant shutdown and cleanup activities, including the scope of Resource Conservation and Recovery Act permitting requirements and associated estimates and schedules.

The original copy of the Change Request has been delivered via this letter to the State of Washington Department of Ecology (Ecology) for disposition. Upon disposition, Ecology is requested to forward the original to the U.S. Environmental Protection Agency (EPA). EPA should then return the completed Change Request to RL.

Should you or your staff have any questions regarding the enclosed Change Control Form, you may contact me on (509) 376-6798 or Mr. Clifford E. Clark on (509) 376-9333.

Sincerely,



Steven H. Wisness  
Hanford Project Manager

Enclosure:

cc w/encl: D. Duncan, EPA  
R. E. Lerch, WHC  
T. Michelena, Ecology  
J. C. Midgett, WHC  
T. B. Veneziano, WHC

Change Number M-20-92-3	Federal Facility Agreement and Consent Order Change Control Form	Date July 29, 1992
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Originator M. W. Cline	Phone (509) 376-9739
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Class of Change <input type="checkbox"/> I - Signatories	<input checked="" type="checkbox"/> II - Project Manager	<input type="checkbox"/> III - Unit Manager
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Change Title Modify PUREX Plant Part B Permit Application Interim Milestone M-20-24.
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Description/Justification of change - Interim Milestone M-20-24 requires that a Part B Dangerous Waste Permit Application be submitted for the PUREX Plant by September 1992. In October of 1990, The Secretary of Energy ordered that the PUREX Plant be placed in a standby condition pending issuance of the Irradiated Fuels Environmental Impact Statement Record of Decision. At the present time, transition to standby is nearly completed; however, future plans for the plant remain uncertain. Until a decision is made regarding future operating plans for the final shutdown conditions for the PUREX Plant, preparation and submittal of a Part B permit application as outlined in the Hanford Federal Facility Agreement and Consent Order Milestone M-20-24 is not considered practical. During standby operations, it is anticipated that Tanks U3, U4, and F18 of those tanks identified in the Part A permit application, and in the Notice of Intent currently in process, will be used for the storage and treatment of dangerous waste.

Number M-20-24	Milestone Submit PUREX Plant Part B permit application or closure plan.	Due Date July 1995
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Impact of Change - This change does not impact other Hanford Federal Facility Agreement and Consent Order Milestones.

Affected Documents - Hanford Federal Facility Agreement and Consent Order, Appendix D, Action Plan, Table D-3, Figure D-1.

Approvals	<input type="checkbox"/> Approved	<input type="checkbox"/> Disapproved
		7/30/92
DOE S. H. Wisness		Date
EPA P. T. Day		Date
Ecology D. B. Jansen		Date

## CORRESPONDENCE DISTRIBUTION COVERSHEET

Author	Addressee	Correspondence No.
J. R. Bellomy, WHC	P. T. Day, EPA D. B. Jansen, Ecology	Incoming: 9205225 XREF: 9253090D
Subject: HANFORD FEDERAL FACILITY AGREEMENT AND CONSENT ORDER CHANGE CONTROL FORM M-20-92-3 "MODIFY PUREX PLANT PART B PERMIT APPLICATION INTERIM MILESTONE M-20-24"		

### INTERNAL DISTRIBUTION

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		G. D. Carpenter	B2-16	X
		L. E. Clay	S6-19	X
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		R. E. Lerch, Asignee	B2-35	X
		P. J. Mackey	B3-15	X
		H. E. McGuire, Level 1	B3-63	X
		J. C. Midgett	S6-15	X
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		S. M. Price	H4-57	X
		R. C. Roal	S6-08	X
		F. A. Ruck	H4-57	X
		T. B. Veneziano	B2-35	X
		EDMC	H4-22	X
		MWC File/LB	H4-57	X

