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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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August 14, 2000

Mr. George Sanders, Director
Waste Management Division
U.S. Department of Energy
P.O. Box 550, MSIN: H0-12
Richland, Washington 99352

Dear Mr. Sanders:

Re: Review of the Project Management Plan (PMP) for Transuranic and Transuranic Mixed Waste (*Hanford Federal Facility Agreement and Consent Order [HFFACO]*), Milestone M-91-03)

Please note that the Washington State Department of Ecology (Ecology) has completed its review of the PMP (Document #HNF-6287, Revision 1) submitted by the U.S. Department of Energy (USDOE) on June 28, 2000, (00-ORL-064). Please see the enclosed comments.

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Milestone M-91-03 requires that USDOE "Submit Hanford Site TRU/TRUM Waste Project Management Plan (PMP) to Ecology pursuant to Agreement Section 11.5." Based on requirements set forth in Section 11.5, the PMP (and its associated Change Request) do not meet HFFACO requirements and are consequently hereby disapproved.

Ecology looks forward to continuing to work with you and your staff to resolve the deficiencies associated with this submittal. If you have questions or concerns, please feel free to contact me at (509) 736 3012.

Sincerely,

Ted Wooley
Nuclear Waste Program

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TW:sb
Enclosure (1)

cc: Douglas Sherwood, EPA
Russel Warren, USDOE
Mary Lou Blazek, OOE
Administrative Record: M-91-03



Washington State Department of Ecology
Comments on Project Management Plan for TRU/TRUM Waste
Document #HNF-6287, Revision 1
June 2000
M-91-03

General Comments:

- 1) Planning retrieval for RH TRU, lacks the following elements:
 - no funding base
 - no technology development
 - no cost or scope for the 200 Area (i.e., RH TRU caissons)
- 2) It is understood that the WIPP WAC for RH TRU is under development; however, this should not inhibit preparation of the waste for disposition to WIPP.
- 3) PMP does not support Spent Nuclear Fuel-Remote Handled TRU storage or treatment.
- 4) Project cost estimate does not correlate well with the proposed work scope.
- 5) Plans to leave Post-1970TRU waste in the ground is a violation of the WIPP Land Withdrawal Act and the Hanford Defense Waste Environmental Impact Statement Record of Decision requirement to ship waste.
- 6) Milestones presented in the change package are incomplete and unenforceable.

Specific Comments

Page 1-2, Line 11, Sentence 2:

1. The statement that read, "Startup activities such as equipment calibration and required equipment functional tests will be identified and defined in the Startup Plan." When will the "startup plan" be available and what external review will occur? Ecology will expect to provide input to this plan prior to issuance of final revision.

Page 2-2, Line 5:

2. Line 17 of the Draft PMP (regarding percentage of stored waste in SWBs) was dropped from revision 1. Section 2.1 of revision 1 was suppose to include this information but does not. Ecology considered this information useful because much of the funding seems to be bounded by waste repackaging. An accurate cost estimate should be based on the amount of waste already package'd in the SWB versus that which isn't. Revise the document to include the estimated percentage of waste stored in SWBs.

Page 2-2, Line 21-27:

3. This paragraph identifies a potentially serious problem with data quality. For instance, if generator data for 1970 to 1973 TRU waste was not based upon a concentration limit, this data has limited use for determining whether the waste is TRU mixed or not. Further effort must be given to flagging data that has questionable utility, so that appropriate analysis of the waste in the future can occur.

Page 2-5, Line 29-32:

4. Provide detailed information (i.e., data logs or other documentation) regarding "good management practices." It is important that Ecology understands what this means so that any information tied to these practices can be considered as being credible.

Page 2-5, Line 36:

5. This section claims that there are no areas of contamination related to retrievably stored TRU/TRU mixed waste. It further identifies several documents that supposedly support this position. For Ecology to agree, all documents would have to be submitted for review and concurrence. Revise the section to qualify the statement with the following: "based on the documents identified in the PMP there is no known area of contamination (AOC); however, this does not rule out the possibility that there is an AOC. Further investigation may be required in the future."

Page 3-2, Line 49:

6. What does DOE-RL base its assumption regarding sitewide infrastructure upon?

Page 3-2, Line 26-29:

7. An assumption made here is that DOE will propose to Congress that the WIPP-WAC be revised to accept PCB contaminated TRU waste, and it is further stated that this will allow disposal at WIPP. How viable is this assumption?

Page 3-7, Lines 26-27:

8. How much estimated capacity for storage is potentially being provided by CWC and LLBG? Also, isn't LLBG one of the areas that TRU/TRU mixed waste will be retrieved from? Revise the PMP to identify the amount of storage capacity that is being potentially provided by CWC and LLBG.

Page 3-7, Line 29-37:

9. Ecology is concerned that the proposal for using T-Plant as storage capacity is not being followed up with funding commitments from DOE-RL to upgrade. Moreover,

the submittal date of the certified RCRA Part B application is not currently known. Caution should be given to writing text that commits other programs to funding and work scope that are not yet agreed to.

Page APP A-1, Appendix A:

10. The Change Request does not meet the requirements of HFFACO 11.5 (See especially the descriptive text in 11.5 following the bullets). Revise the PMP accordingly.
11. The boilerplate of the Change Request is unacceptable in that it is rudimentary and not up to current, HFFACO practices. Please update the change request.
12. The Change Request will need to be redrafted to meet 11.5 requirements, to reflect project critical path and key deliverables for RH and CH (e.g., See PMP figures 4.2 and 6.0). Milestones will need to be spaced at a minimum of 1/year per/project (for CH and RH). Revise PMP accordingly.

Page APP B-I, Appendix B:

13. Although Appendix B does have some physical data, the data quality is unknown. In cases where designation was performed, no information is provided on the basis for the designation (i.e., what process knowledge was used?). For this information to be usable, more background will be required. Describe what makes this information usable for decision making.

Page E-ii, Appendix E:

14. This PMP does meet previously agreed to requirements set forth in section 11.5 of the TPA. For example, Project Scope (i) facility description requires that the facility boundary be clearly delineated. Nowhere in this PMP is a clear facility boundary description presented. Revise PMP accordingly.
15. Section 11.5 requires that the PMP include detailed work schedules (11.5, pp1). Revise PMP accordingly.
16. Section 11.5 requires that critical path (implementation) schedules be provided which include, but are not limited to, start and completion dates (11.5, pp2). Revise PMP accordingly.
17. PMP is weak at a number of additional points including: text which should detail interfaces with other HFFACO (site) projects, issues raised, and how they will be managed; discussion of regulatory requirements (11.5, v); and project scope (11.5, bullet 3). The PMP does not clearly articulate either the "physical" or "action" boundaries of the project.