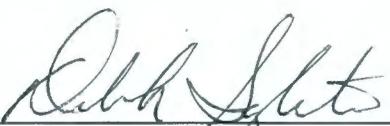
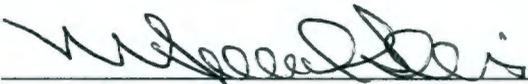


Meeting Minutes Transmittal

M-91
Project Managers Meeting
825 Jadwin/Room 340
Hanford, Washington
August 28, 2008

The undersigned indicate by their signatures that these meeting minutes reflect the actual occurrences of the above dated Project Managers Meeting. Signatures denote concurrence with content only and are not intended to imply agreement to any commitments.

 Date: 9/25/2008
Project Manager, Ecology

 Date: 25 September 2008
Project Manager Representative, RL

 Date: 9/25/08
Project Manager Representative, FH

- | | |
|----------------------------|-------|
| M-91 Administrative Record | H6-08 |
| CS Louie | A5-11 |
| DG Singleton | H0-57 |
| M Mandis | H0-57 |
| KM Quigley | H8-44 |

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**M-91 PROJECT MEETING
825 Jadwin/Room 340
Hanford, Washington
August 28, 2008**

10:15 a.m. to 10:45 a.m.

Agenda

- I. Approval of July 24, 2008 M-91 Project Meeting Minutes
(Ecology/DOE-RL/FH)
- II. Status Report
 - A. TPA Milestone Update
 - B. Concerns regarding meeting scheduled milestone completion dates
 - C. SAP Implementation
- III. General Discussions
- IV. Status of Actions
- V. New Action Items
- VI. Documents for Submittal to the Administrative Record
- VII. Next Project Managers Meeting

M-91 PROJECT MEETING MINUTES

Project Managers Meeting
825 Jadwin/Room 340/700 Area
Richland, Washington

August 28, 2008

- I. Approval of July 24, 2008 M-91 Project Meeting Minutes (Ecology/DOE-RL/FH). The PMM minutes were approved.

- II. Status Report
 - A. TPA Milestone Update

The M-91 milestone status summary for 8/28/08 was provided by Greg Sinton (RL). Regarding the M-91-15 completion letter sent to Ecology on July 24, 2008, Mr. Sinton provided Michelle Mandis (Ecology) with a table she requested which shows the totals of remote-handled and large size waste that was treated as of the end of June 2008. Ms. Mandis indicated that once the table is reviewed internally, Ecology will send RL an acceptance letter. Mr. Sinton stated that the M-91-40 retrieval of 9,700 cubic meters, which had been at risk, is anticipated to be met sometime in September 2008.

Regarding M-91-42, Mr. Sinton stated that the plan is to ship 7,400 cubic meters for treatment by the end of September 2008. Ken Quigley (FH) inquired about the status of the waste if it's been treated, but hasn't been sent back to the Hanford Site for disposal. Deborah Singleton (Ecology) stated that a discussion will be needed to address the issue if there is a risk of delay in receipt of the treated waste.
 - B. Concerns Regarding Meeting Scheduled Milestone Completion Dates

The concerns are addressed in the M-91 status summary.
 - C. SAP Implementation

A meeting was held on August 26, 2008 to discuss the M-91 retrieval SAPs. Mr. Sinton noted that the quarterly SAP report is being sent to Ecology, which states that there are no results this quarter.

- III. General Discussions
 - A. Larry Romine (RL) suggested scheduling workshops with Ecology to discuss options for streamlining retrieval, and Ms. Singleton concurred with the suggestion.

- IV. Status of Actions
 - A. 1974 - Schedule a meeting with Ecology the week of 8/26 to discuss the M-91 retrieval SAPs. A meeting was held August 26, 2008. Ecology will schedule a follow-up meeting to discuss issues and concerns.

- V. New Action Items
 - A. There were no new action items.

- VI. Documents for Submittal to the Administrative Record
 - A. The M-91-08-02 change package approval letter from Ecology with accompanying comments; the M-91-15 completion letter and the table requested by Ecology will be submitted.

- VII. Next Project Managers Meeting
 - A. The next PMM was scheduled for September 25, 2008.

M-91 Status Summary 8/28/08

| Milestone | Due Date(s) | Status Summary | Comments |
|---|-------------|---|--|
| General Comments | | | <p>A. Status of M-91 Change Packages:</p> <ol style="list-style-type: none"> 1. M-91-08-02: FY08 M-91-42 TRUM and MLLW CP: Now includes M-91-42 MLLW language also. The change package was approved by Ecology August 12, 2008. 2. M-91-08-03: M-91-45 consolidation into PMP CP: Change package was approved by Ecology 6/25/08 (approval letter dated June 27). <p>B. In this table "On-Schedule" means it is anticipated the milestone will be met.</p> |
| <p>M-91-00: Major Milestone for acquisition of needed facilities/capabilities for mixed and suspect mixed MLLW, and TRUM and suspect TRUM.</p> | TBD | On Schedule | |
| <p>M-91-01: Facility/Capability Interim Milestone (RH and/or large container TRUM)</p> | 6/30/12 | <p>At Risk</p> <p>The current understanding is that this milestone will be considered met by achieving capabilities to treat RH/Large transuranic waste</p> | <ul style="list-style-type: none"> • The CD-0 approval from DOE HQ has been obtained. • Additional discussion of proposed alternatives and methods to meet needed capabilities is included in the June 2008 PMP update. • A draft M-91 Project Alternatives Evaluation Study was completed in April to document the current state of alternatives analysis. Additional design work has been put on hold based on the lack of funding in the presidents budget for FY09, pending the FY09 appropriation. |

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| | | at the rates described in M-91-44. As with M-43 it may be desirable to allow early treatment of some of this waste to count toward the initial annual M-91-44 volume | |
| M-91-03: Submit TRUM/MLLW PMP | 12/31/03 (Complete), 12/28/06 (Complete) 6/30/08 and annually thereafter | On Schedule | The 2008 PMP (Rev 4) was delivered to Ecology June 30, 2008. Received Ecology approval and comments August 11, 2008. Some comments will not be applicable by next year, however the comments can be addressed through preparation of the June 2009 PMP revision. <ul style="list-style-type: none"> • Suggest near term meeting to go over questions and tentative plans for addressing comments. • Suggest preparing comment resolution table for discussion as part of preparation of June 2009 update when more current status/plan is known. |
| M-91-15: RH MLLW and/or Large Size MLLW Treatment | 6/30/08 | Complete | “COMPLETE ACQUISITION OF FACILITIES AND/OR CAPABILITIES AND INITIATE TREATMENT OF RH-MLLW AND CH MLLW IN LARGE CONTAINERS PER THE RATES STIPULATED IN M-91-43” <ul style="list-style-type: none"> • Treatment of both RH and large container MLLW has been adequately demonstrated at ES-Clive and Permafrix to meet this milestone. • An M-91-15 completion letter was sent to Ecology July 24, 2008 (08-AMCP-0232). |

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| <p>M-91-40: Retrieval and designation of CH-RSW (regardless of size)</p> | <p>9,700 m³ cumulative by 12/31/08 and annual retrieval volumes through 2010. Complete retrieval in 4C T-4 by 12/31/06. Plus various other requirements</p> | <p>At Risk</p> <p>Met 7200 level in November 2007;</p> <p>A recovery plan is in place with a plan to recover to meet or exceed 9,200 m³ by 9/30/08. FY09 appropriation may affect the ability to meet 12/31/08 and subsequent retrieval milestones.</p> | <ul style="list-style-type: none"> • Met the 12/31/07 milestone to retrieve 7200 m³ on 11/27/07 (08-AMCP-0072). • 8,822 m³ of RSW had been retrieved as of 8/20/08. • The October-December SAP quarterly report sent to Ecology March 21, 2008 includes the initial "step II" sampling results. Meeting held with Ecology to discuss results August 26, 2008. • January-March SAP quarterly report sent June 10. April-June transmittal in preparation (No results for this period). • Shipped repaired 4C T7 FRP Box 24 to CWC April 29, 2008. Shipped FRP box 23 to CWC May 23, 2008. |
| <p>M-91-41: Retrieval and Designation of RH RSW (regardless of size)</p> | <p>See comment column</p> | <p>On Schedule (Planning)</p> | <ul style="list-style-type: none"> • 1/1/11: Initiate retrieval of RH RSW • 12/31/14: Complete non-caisson RH RSW retrieval • 12/31/18: Complete 4B RH RSW retrieval |
| <p>M-91-42: Treatment of non-large size CH-MLLW and certification of non-large size CH TRUM</p> | <p>Annual treatment requirements through 12/31/09 (MLLW), 12/31/11 (TRUM)</p> | <p>At Risk</p> <p>Behind TPA schedule for CH TRUM certification.</p> <p>On schedule for</p> | <ul style="list-style-type: none"> • Met the MLLW 12/31/07 milestone (6520 cubic meters) December 20, 2007. • 6,776 m³ of the MLLW subject to this milestone (MLLW-2 through MLLW-10 excluding MLLW-7) had been treated as of 8/15/08 (7,220 m³ required by 12/31/08). • 7,251 cubic meters had been shipped as of 8/15/08. Now plan to ship approximately 7380 cubic meters by 9/30/08. • TPA change package M-91-08-02 has been approved to address 2008 M-91-42 MLLW and TRUM requirements. |

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| (M-91-42 Continued) | | revised MLLW and TRUM 2008 commitments | <ul style="list-style-type: none"> • The amount of M-91-42 MLLW in SWOC storage decreased 119 cubic meters in July to 529 m³ as of 7/31/08. • Shipped 2928 cubic meters of M-91-42 TRU/M and had accumulated a backlog of 286 cubic meters of certified but not shipped TRU/M bringing the total certified TRU/M counting toward M-91-42 to 3,214 cubic meters as of 8/21/08. • The volume of M-91-42 TRUM stored in SWOC increased 27 cubic meters in July to 2,352 cubic meters as of 7/31/08. • Repackaged 132 drums at T-Plant in July. • Repackaged 58 drums at WRAP in July. |
| M-91-43: Designation and treatment of RH and or Large Size MLLW (M-91-43 continued) | See Comment Column | On Schedule | <ul style="list-style-type: none"> • A shipment of 47 cubic meters of large containers was sent to PFNW May 13 bringing the M-91-43 cumulative shipped total to 330 cubic meters. No more M-91-43 shipments are planned for FY08 with shipment focus shifted to M-91-42 shipments. • Treated 283 m³ of MLLW-07 since 12/31/02 as of 8/16/08. • M-91-43 waste in storage in SWOC was unchanged in July at 403m³. • It is currently estimated that confirmation of treatment of the first 300 cubic meter M-91-43 increment will be obtained by 9/30/08, 9 months early. • Completion letter for designation of all above ground permitted storage M-91-43 waste was sent in July (combined with M-91-15 completion letter) |
| M-91-44: Designation of Newly Generated and Stored RH and or Large Size | See Comment Column | At Risk | <ul style="list-style-type: none"> • Existing requirements include: a) Designate all RH and large size Transuranic waste in storage by 12/31/12. b)Begin treating RH and/or large container TRUM at a minimum rate of 300 cubic meters per year by 6/30/2012 |

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| Transuranic Waste and Large/RH TRUM certification | | | <ul style="list-style-type: none"> • M-91-44 TRUM in SWOC storage increased 99 cubic meters in July to 4038 cubic meters. |
| M-91-45: RH and or Large Size Waste Annual Report | 9/30/04 and annually thereafter | On Schedule | <ul style="list-style-type: none"> • 2007 report was mailed to Ecology 9/24/07 (07-AMCP-0293) and approved by an Ecology letter dated November 20, 2007. • Change Package M-91-08-03 incorporating this reporting requirement into the annual M-91 PMP submittal was approved June 25, 2008. The M-91-45 information will be consolidated into the June 2009 and subsequent PMP submittals. • There will be no separate M-91-45 submittal 9/30/08 since FY08 reporting will be covered by the next PMP update. |
| M-16-93: Submit implementation workplan for acquisition of capabilities necessary to prepare TRU/M waste generated by CERCLA clean-up actions at Hanford for disposal at WIPP. | 9/30/2006 | Complete Next revision is anticipated to occur in 2009. | <ul style="list-style-type: none"> • Report Delivered to EPA and Ecology 9/29/06 (06-AMCP-312) • Briefing to EPA and Ecology on workplan October 11, 2006 • May want to consider elimination of M-16-93 report by incorporation of information in M-91 PMP. The M-16-93 update could be included in the June 2009 PMP submittal instead of a separate 12/31/09 M-16-93 submittal. |

Fn: M-91 PMM Status table 8-28-08

| LDR Waste Stream | SHIPPED PIN | OUTGOING SHIPMENT NO. | OUTBOUND SHIPMENT DATE | WASTE PACKAGE VOL (m ³) | COMPLETED WASTE VOL AS-OF 8/1/08 (m ³) | COMPLETION DATE | TREATMENT FACILITY (if applicable) | DISPOSAL LOCATION | TREATMENT or DISPOSITION METHOD | MLLW-07 LDR TG JUSTIFICATION |
|------------------|----------------|-----------------------|------------------------|-------------------------------------|--|-----------------|------------------------------------|-------------------|---------------------------------|---|
| MLLW-07 | 3285 | Facility Transfer | 9/13/04 | 0.41 | 0.41 | 9/13/04 | n/a | MW Disposal Units | Direct Disposal | RH-MLLW shield down to CH-MLLW levels to allow for storage at the CWC |
| MLLW-07 | 4415 | Facility Transfer | 9/13/04 | 0.91 | 0.91 | 9/13/04 | n/a | MW Disposal Units | Direct Disposal | RH-MLLW shield down to CH-MLLW levels to allow for storage at the CWC |
| MLLW-07 | 0004998 | CC081 | 7/21/04 | 0.21 | 0.21 | 9/3/04 | PEcoS | MW Disposal Units | MACRO | RH-MLLW shield down to CH-MLLW levels to allow for storage at the CWC |
| MLLW-07 | 0005002 | CC081 | 7/21/04 | 0.21 | 0.21 | 9/3/04 | PEcoS | MW Disposal Units | MACRO | RH-MLLW shield down to CH-MLLW levels to allow for storage at the CWC |
| MLLW-07 | 0005115 | CC081 | 7/21/04 | 0.21 | 0.21 | 9/3/04 | PEcoS | MW Disposal Units | MACRO | RH-MLLW shield down to CH-MLLW levels to allow for storage at the CWC |
| MLLW-07 | 9401308 | CC061 | 7/21/04 | 0.21 | 0.21 | 9/3/04 | PEcoS | MW Disposal Units | MACRO | RH-MLLW shield down to CH-MLLW levels to allow for storage at the CWC |
| MLLW-07 | 9401309 | CC061 | 7/21/04 | 0.21 | 0.21 | 9/9/04 | PEcoS | MW Disposal Units | MACRO | RH-MLLW shield down to CH-MLLW levels to allow for storage at the CWC |
| MLLW-07 | 9519113 | CC083 | 8/12/04 | 6.37 | 6.37 | 11/3/04 | PEcoS | MW Disposal Units | MACRO | RH-MLLW shield down to CH-MLLW levels to allow for storage at the CWC |
| MLLW-07 | 9521684 | CC081 | 7/21/04 | 0.21 | 0.21 | 9/9/04 | PEcoS | MW Disposal Units | MACRO | RH-MLLW shield down to CH-MLLW levels to allow for storage at the CWC |
| MLLW-07 | 9521695 | CC061 | 7/21/04 | 0.21 | 0.21 | 10/11/04 | PEcoS | MW Disposal Units | MACRO | RH-MLLW shield down to CH-MLLW levels to allow for storage at the CWC |
| MLLW-07 | 9522119 | CC061 | 7/21/04 | 0.21 | 0.21 | 9/9/04 | PEcoS | MW Disposal Units | MACRO | RH-MLLW shield down to CH-MLLW levels to allow for storage at the CWC |
| MLLW-07 | 9522513 | CC063 | 8/12/04 | 6.37 | 6.37 | 10/11/04 | PEcoS | MW Disposal Units | MACRO | RH-MLLW shield down to CH-MLLW levels to allow for storage at the CWC |
| MLLW-07 | 9600457 | CC053 | 6/3/04 | 0.21 | 0.21 | 9/3/04 | PEcoS | MW Disposal Units | MACRO | RH-MLLW shield down to CH-MLLW levels to allow for storage at the CWC |
| MLLW-07 | 9607973 | CC053 | 6/3/04 | 0.21 | 0.21 | 9/3/04 | PEcoS | MW Disposal Units | MACRO | RH-MLLW shield down to CH-MLLW levels to allow for storage at the CWC |
| MLLW-07 | 9701602 | CC061 | 7/21/04 | 0.21 | 0.21 | 9/3/04 | PEcoS | MW Disposal Units | MACRO | RH-MLLW shield down to CH-MLLW levels to allow for storage at the CWC |
| MLLW-07 | 9703458 | CC021 | 7/17/03 | 0.21 | 0.21 | 11/13/03 | PEcoS | MW Disposal Units | MACRO | RH-MLLW shield down to CH-MLLW levels to allow for storage at the CWC |
| MLLW-07 | 9802782 | CC024 | 11/6/03 | 0.68 | 0.68 | 7/23/04 | PEcoS | MW Disposal Units | MACRO | RH-MLLW shield down to CH-MLLW levels to allow for storage at the CWC |
| MLLW-07 | 9804066 | CC053 | 6/3/04 | 0.21 | 0.21 | 9/3/04 | PEcoS | MW Disposal Units | MACRO | RH-MLLW shield down to CH-MLLW levels to allow for storage at the CWC |
| MLLW-07 | 9804077 | CC053 | 6/3/04 | 0.21 | 0.21 | 9/3/04 | PEcoS | MW Disposal Units | MACRO | RH-MLLW shield down to CH-MLLW levels to allow for storage at the CWC |
| MLLW-07 | 9901269 | CC061 | 7/21/04 | 0.21 | 0.21 | 9/3/04 | PEcoS | MW Disposal Units | MACRO | RH-MLLW shield down to CH-MLLW levels to allow for storage at the CWC |
| MLLW-07 | 9901854 | DC006 | 7/8/04 | 12.69 | 12.69 | 10/27/04 | PEcoS | MW Disposal Units | MACRO | Large Size Ch-MLLW (i.e., >10m ³) |
| MLLW-07 | 9901855 | DC007 | 6/24/04 | 12.69 | 12.69 | 10/27/04 | PEcoS | MW Disposal Units | MACRO | Large Size Ch-MLLW (i.e., >10m ³) |
| MLLW-07 | 9901856 | DC008 | 8/5/04 | 12.69 | 12.69 | 10/27/04 | PEcoS | MW Disposal Units | MACRO | Large Size Ch-MLLW (i.e., >10m ³) |
| MLLW-07 | 9901857 | DC009 | 7/22/04 | 12.69 | 12.69 | 10/27/04 | PEcoS | MW Disposal Units | MACRO | Large Size Ch-MLLW (i.e., >10m ³) |
| MLLW-07 | 9902234 | CC063 | 8/12/04 | 6.37 | 6.37 | 11/3/04 | PEcoS | MW Disposal Units | MACRO | RH-MLLW shield down to CH-MLLW levels to allow for storage at the CWC |
| MLLW-07 | 9903188 | CC048 | 4/22/04 | 5.43 | 5.43 | 7/9/04 | PEcoS | MW Disposal Units | MACRO | RH-MLLW shield down to CH-MLLW levels to allow for storage at the CWC |
| MLLW-07 | 221T-92-000093 | Facility Transfer | 6/26/03 | 24.64 | 24.64 | 6/26/03 | n/a | MW Disposal Units | Direct Disposal | Large Size Ch-MLLW (i.e., >10m ³) |

| | | | | | | | | | | |
|---|--------------------------------|-------------------|----------|------------|------------|------------|----------|--------------------|-----------------|---|
| MLLW-07 | 221T-92-00094 | Facility Transfer | 6/26/03 | 24.64 | 24.64 | 6/26/03 | n/a | MW Disposal Units | Direct Disposal | Large Size CH-MLLW (i.e., >10m3) |
| MLLW-07 | 328-88-0012S | Facility Transfer | 6/26/03 | 30.41 | 30.41 | 3/11/04 | n/a | LLW Burial Grounds | Direct Disposal | Large Size CH-MLLW (i.e., >10m3) |
| MLLW-07 | 340-89-0011 | CC053 | 6/3/04 | 0.21 | 0.21 | 9/3/04 | PEcoS | MW Disposal Units | MACRO | RH-MLLW shield down to CH-MLLW levels to allow for storage at the CWC |
| MLLW-07 | ERO-93-000733 | Facility Transfer | 7/1/03 | 6.66 | 6.66 | 3/11/04 | n/a | LLW Burial Grounds | Direct Disposal | RH-MLLW shield down to CH-MLLW levels to allow for storage at the CWC |
| MLLW-07 | ERO-93-000734 | Facility Transfer | 7/1/03 | 6.66 | 6.66 | 3/11/04 | n/a | LLW Burial Grounds | Direct Disposal | RH-MLLW shield down to CH-MLLW levels to allow for storage at the CWC |
| MLLW-07 | ERO-93-000735 | Facility Transfer | 7/1/03 | 6.66 | 6.66 | 3/11/04 | n/a | LLW Burial Grounds | Direct Disposal | RH-MLLW shield down to CH-MLLW levels to allow for storage at the CWC |
| MLLW-07 | ETF-241-900463 | CC061 | 7/21/04 | 0.21 | 0.21 | 9/3/04 | PEcoS | MW Disposal Units | MACRO | RH-MLLW shield down to CH-MLLW levels to allow for storage at the CWC |
| MLLW-07 | FFS-01-268-03 | CC047 | 2/9/04 | 6.37 | 6.37 | 7/23/04 | PEcoS | MW Disposal Units | MACRO | RH-MLLW shield down to CH-MLLW levels to allow for storage at the CWC |
| MLLW-07 | FFS-01-310-02 | CC063 | 8/12/04 | 6.37 | 6.37 | 10/1/04 | PEcoS | MW Disposal Units | MACRO | RH-MLLW shield down to CH-MLLW levels to allow for storage at the CWC |
| MLLW-07 | WTFF-91-148-02 | CC053 | 6/3/04 | 0.21 | 0.21 | 9/3/04 | PEcoS | MW Disposal Units | MACRO | RH-MLLW shield down to CH-MLLW levels to allow for storage at the CWC |
| MLLW-07 | 3597-24-223 | HC013 | 02/01/08 | 11.695 | 11.695 | 4/23/08 | PFNW | MW Disposal Units | MACRO | Large Size CH-MLLW (i.e., >10m3) |
| MLLW-07 | 3597-24-224 | HC013 | 02/01/08 | 11.695 | | In Process | PFNW | | MACRO | Large Size CH-MLLW (i.e., >10m3) |
| MLLW-07 | 3597-25-227 | HC013 | 02/01/08 | 11.695 | | In Process | PFNW | | MACRO | Large Size CH-MLLW (i.e., >10m3) |
| MLLW-07 | 3597-6-98 | HC013 | 02/01/08 | 11.695 | 7.797 | 4/23/08 | PFNW | MW Disposal Units | MACRO | Large Size CH-MLLW (i.e., >10m3) |
| MLLW-07 | 3597-18-210 | HC015 | 03/05/08 | 11.270 | | In Process | PFNW | | MACRO | Large Size CH-MLLW (i.e., >10m3) |
| MLLW-07 | 3597-23-218 | HC015 | 03/05/08 | 11.270 | | In Process | PFNW | | MACRO | Large Size CH-MLLW (i.e., >10m3) |
| MLLW-07 | 0047110 (inner drum BN184-011) | GC027 | 04/08/08 | 0.208 | | In Process | PFNW | | MACRO | RH-MLLW shield down to CH-MLLW levels to allow for storage at the CWC |
| MLLW-07 | 0047111 (inner drum BN184-012) | GC034 | 04/08/08 | 0.208 | | In Process | PFNW | | MACRO | RH-MLLW shield down to CH-MLLW levels to allow for storage at the CWC |
| MLLW-07 | 0047112 (inner drum BN184-013) | GC035 | 04/08/08 | 0.208 | | In Process | PFNW | | MACRO | RH-MLLW shield down to CH-MLLW levels to allow for storage at the CWC |
| MLLW-07 | 0004318 | HC014 | 04/24/08 | 0.680 | | In Process | ES-Clive | | MACRO | RH-MLLW shield down to CH-MLLW levels to allow for storage at the CWC |
| MLLW-07 | 0042918 | HC014 | 04/24/08 | 17.400 | | In Process | ES-Clive | | MACRO | Large Size CH-MLLW (i.e., >10m3) |
| MLLW-07 | CPO-02-120-01 | HC014 | 04/24/08 | 0.680 | | In Process | ES-Clive | | MACRO | RH-MLLW shield down to CH-MLLW levels to allow for storage at the CWC |
| MLLW-07 | CSSO-94-293-11 | HC014 | 04/24/08 | 1.120 | | In Process | ES-Clive | | MACRO | RH-MLLW shield down to CH-MLLW levels to allow for storage at the CWC |
| MLLW-07 | 3597-13-195 | HC024 | 05/13/08 | 11.695 | | In Process | PFNW | | MACRO | Large Size CH-MLLW (i.e., >10m3) |
| MLLW-07 | 3597-24-225 | HC024 | 05/13/08 | 11.695 | | In Process | PFNW | | MACRO | Large Size CH-MLLW (i.e., >10m3) |
| MLLW-07 | 3597-24-228 | HC024 | 05/13/08 | 11.695 | | In Process | PFNW | | MACRO | Large Size CH-MLLW (i.e., >10m3) |
| MLLW-07 | 3597-25-228 | HC024 | 05/13/08 | 11.695 | | In Process | PFNW | | MACRO | Large Size CH-MLLW (i.e., >10m3) |
| TPA MILESTONE M-91-43 TOTALS | | | | 330 | 213 | | | | | |
| Large Size CH-MLLW (i.e., >10m3) | | | | 284 | 150 | | | | | |
| RH-MLLW shield down to CH-MLLW levels to allow for storage at the CWC | | | | 46 | 63 | | | | | |



0802086
CC Recd: 08/20/2008

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

3100 Port of Benton Blvd • Richland, WA 99354 • (509) 372-7950

August 15, 2008

Mr. David A. Brockman, Manager
Richland Operations Office
United States Department of Energy
P.O. Box 550, MSIN: A7-50
Richland, Washington 99352

Re: Hanford Federal Facility Agreement and Consent Order Change Control
Number M-91-08-02

Dear Mr. Brockman:

This letter transmits a copy of the signed Hanford Federal Facility Agreement and Consent Order (HFFACO) Change Control Number M-91-08-02. Terry Noland, Fluor Hanford, Inc., picked up the original, signed document on August 13, 2008.

This change package authorizes an update to the HFFACO to modify the two interim milestones:

- M-91-42 Requirement 2.E: Treatment Rates for Mixed Low-Level Waste.
- M-91-42 Requirement 4: Certification Rates for Transuranic and Transuranic Mixed Waste.

If you have any questions, please contact Ron Skinnarland at 509-372-7924 or Deborah Singleton at 509-372-7923.

Sincerely,

Jane A. Hedges
Program Manager
Nuclear Waste Program

mm/pll
Enclosure

cc: Larry Romine, USDOE
Greg Sinton, USDOE
Steve Weil, USDOE
Rob Piippo, FH
Stuart Harris, CTUIR
Gabriel Bohnee, NPT

Russell Jim, YN
Susan Leckband, HAB
Ken Niles, ODOE
Administrative Record: M-91-42
Environmental Portal



| | | |
|--|--|---|
| Change Number M-91-08-02 | Federal Facility Agreement and Consent Order Change Control Form Do not use blue ink. Type or print using black ink. | Date August 1, 2008 |
| Originator Matt McCormick | | Phone (509) 373-9971 |
| Class of Change <input type="checkbox"/> I – Signatories <input checked="" type="checkbox"/> II – Executive Manager <input type="checkbox"/> III – Project Manager | | |
| Change Title Modification of Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) M-91-42 TRUM certification and MLLW treatment interim milestone | | |
| Description/Justification of Change This change package modifies the M-91-42 requirement 4, to treat/certify 5,400 cubic meters cumulative of Contact Handled (CH) transuranic waste by December 31, 2008, to a requirement to treat/certify 600 cubic meters of transuranic waste between October 1, 2007, and September 30, 2008. This change package also modifies the M-91-42 requirement to treat 8,150 cubic meters of contact handled mixed low level waste (CH MLLW) by December 31, 2008, to 7,220 cubic meters. These changes are necessary due to constraints associated with certifying/treating the volumes of remaining TRUM and MLLW currently needed to meet the cumulative totals as specified in the existing milestone. <p style="text-align: center;">(Continued on page 2)</p> | | |
| Impact of Change The change recognizes that the original milestone cannot be met in Fiscal Year 2008 and modifies the milestone to reflect the amount of waste that will be certified and treated with the available technical resources and appropriated funds in 2008. | | |
| Affected Documents The Hanford Federal Facility Agreement and Consent Order, as amended and Hanford Site internal planning, management and budget documents (e.g., baseline control documents, related work authorization and directives). M-91 TRU Mixed/Mixed Low Level Waste Project Management Plan. | | |
| Approvals | | |
| Jane A. Hedges by <i>E.R. Skinn</i> Ecology | 8/12/08 Date | <input checked="" type="checkbox"/> Approved <input type="checkbox"/> Disapproved |
| David A. Beach DOE-RL | 8/5/08 Date | <input checked="" type="checkbox"/> Approved <input type="checkbox"/> Disapproved |
| N/A EPA | _____ Date | <input type="checkbox"/> Approved <input type="checkbox"/> Disapproved |

Description/Justification continued:

The volumes to be certified and treated and the 2008 certification due date are being adjusted per the Agreement Article XL's Good Cause for Extensions provisions paragraph 119, "Either a timetable and deadline or a schedule shall be modified upon receipt of a timely request for extension and when good cause exists for the requested extension" and paragraph 120, subparagraph E, Any other event or series of events mutually agreed to by the Parties as constituting good cause.

The certification in lieu of LDR treatment of TRU/M waste is behind the current Tri-Party Agreement schedule. The Parties have agreed that it is not feasible to recover the current Tri-Party Agreement schedule for Calendar Year 2008. Thus, the Parties have agreed to adjust the Fiscal Year 2008 certification volume to 600 cubic meters as specified in the M-91-42 Stipulated Penalty Agreement, paragraph 9, signed June 12, 2008.

USDOE has consistently met the Tri-Party Agreement schedule for the LDR treatment of M-91-42 MLLW. However, in December of 2007, USDOE noted that only 660 cubic meters of M-91-42 MLLW was available for treatment. Also over 200 cubic meters of this M-91-42 MLLW in storage does not have a treatment path available. Most of this waste is PCB contaminated waste that was anticipated to be treated commercially. Technology problems and permitting delays at commercial facilities have resulted in no currently available treatment path. Thus, as of December 2007, only 460 cubic meters of M-91-42 MLLW was available for treatment. This volume coupled with the newly generated and retrieved M-91-42 MLLW still is an insufficient volume to meet the 8150 cubic meters cumulative volume specified by the Tri-Party Agreement for 2008. The Parties have agreed that it is not feasible to meet the current 2008 Tri-Party Agreement schedule. Thus, the Parties have agreed to adjust the 2008 M-91-42 MLLW cumulative volume to 7220 cubic meters. In order to meet the 7,220 cubic meter milestone at least 7,280 cubic meters of applicable waste will have been shipped for treatment by that date.

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| <p>M-91-42</p> | <p>REGARDING SMALL CONTAINERS OF: (1) NEWLY GENERATED CH WASTE; (2) CH RSW; AND (3) CH WASTE CURRENTLY IN ABOVE-GROUND STORAGE</p> <ol style="list-style-type: none"> 1. DOE SHALL DESIGNATE ALL NEWLY GENERATED CH WASTE AT THE POINT OF GENERATION. SUCH DESIGNATION SHALL COMPLY WITH THE REQUIREMENTS OF WAC 173-303-070 THROUGH 100. 2. THERE WERE 5,066 CUBIC METERS OF CH-MLLW IN PERMITTED STORAGE AT DOE'S CENTRAL WASTE COMPLEX (CWC) AND ELSEWHERE AT HANFORD AS OF 12/31/02 (AS IDENTIFIED IN DOE HFFACO MILESTONE M-26-01 LDR REPORT MLLW TREATABILITY GROUPS MLLW-02 THROUGH MLLW-10, EXCLUDING MLLW-07) THAT HAD NOT BEEN TREATED TO MEET LDR REQUIREMENTS. (THIS VOLUME DOES NOT INCLUDE 600 CUBIC METERS OF WASTE REQUIRING THERMAL TREATMENT, AS THAT WASTE HAS SEPARATE TREATMENT REQUIREMENTS PER M-91-12 AND M-91-12A). APPROXIMATELY 4422 CUBIC METERS OF MLLW SUBJECT TO M-91-42 WAS TREATED BETWEEN 12/31/02 AND 12/31/05. DOE'S 2002 LDR REPORT ESTIMATED GENERATION OF AN ADDITIONAL ANNUAL VOLUME OF APPROXIMATELY 330 CUBIC METERS OF CH-MLLW (AS WASTE TYPES IDENTIFIED IN DOE HFFACO MILESTONE M-26-01 LDR REPORT MLLW TREATABILITY GROUPS MLLW-02 THROUGH MLLW-10, EXCLUDING MLLW-07). IT WAS ALSO ESTIMATED IN 2002 THAT DOE WOULD RETRIEVE APPROXIMATELY 800 CUBIC METERS OF CH-MLLW BY 2010. BASED ON THE CY2005 LDR SUMMARY REPORT AS OF 12/31/05 FOR MLLW SUBJECT TO M-91-42, THERE WERE APPROXIMATELY 2100 CUBIC METERS IN PERMITTED STORAGE, AND 280 CUBIC METERS FORECAST TO BE GENERATED BY THE END OF CY2009. <p>ACCORDING TO THE M-91 PMP (HNF-19169 REV 2) APPROXIMATELY 2550 CUBIC METERS OF M-91-42 MLLW WAS EXPECTED TO BE RETRIEVED BETWEEN 12/31/05 AND 12/31/09. IN ADDITION TO MEETING THE REQUIREMENTS OF M-91-12 AND M-91-12A, DOE SHALL TREAT THE WASTE DESCRIBED ABOVE TO MEET LDR REQUIREMENTS ON A SCHEDULE MEETING, AT MINIMUM, THE FOLLOWING CUMULATIVE TOTALS BASED ON A START DATE OF 12/31/02:</p> <ol style="list-style-type: none"> A. 1630 CUBIC METERS (CUMULATIVE) SHALL BE TREATED BY 12/31/04, | <p>DUE DATES AS INDICATED IN THE DESCRIPTIVE TEXT OF THIS MILESTONE</p> |
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- B. 3260 CUBIC METERS BY (CUMULATIVE) SHALL BE TREATED BY 12/31/05,
- C. 4890 CUBIC METERS (CUMULATIVE) SHALL BE TREATED BY 12/31/06,
- D. 6520 CUBIC METERS (CUMULATIVE) SHALL BE TREATED BY 12/31/07,
- E. 7,220 ~~8150~~-CUBIC METERS (CUMULATIVE) SHALL BE TREATED BY 12/31/08, AND
- F. COMPLETE TREATMENT OF ALL CH-MLLW (5066 CUBIC METERS IN STORAGE AS OF 12/31/02 AS DESCRIBED ABOVE, AND RETRIEVED CH-MLLW AND NEWLY GENERATED CH-MLLW IN THE TREATABILITY GROUPS DESCRIBED ABOVE, AS OF 6/30/09, BY 12/31/09.)

IF CH-MLLW IN THE TREATABILITY GROUPS SUBJECT TO THIS MILESTONE GENERATED DURING THE PERIOD FROM 12/31/02 THROUGH 6/30/09 IS TREATED TO LDR STANDARDS PRIOR TO DELIVERY TO STORAGE OR DISPOSAL, THE ORIGINAL PRE-TREATMENT VOLUME OF THAT WASTE SHALL BE COUNTED TOWARD MEETING THE VOLUME REQUIREMENTS OF THIS MILESTONE. EXCEPT FOR WASTE ALREADY IN PERMITTED STORAGE AS OF 12/31/02, TREATMENT OF CERCLA WASTE WILL NOT BE COUNTED TOWARD MEETING THE VOLUME REQUIREMENTS OF THIS MILESTONE. RSW DETERMINED TO BE MLLW IN THE TREATABILITY GROUPS COVERED BY THIS MILESTONE WILL BE COUNTED TOWARD MEETING THE VOLUME REQUIREMENTS OF THIS MILESTONE WHEN TREATED.

IF THE ACTUAL VOLUME OF NEWLY GENERATED OR RETRIEVED CH-MLLW COVERED BY THIS MILESTONE IS LOWER THAN THE ESTIMATED VOLUMES ANTICIPATED BY THESE MILESTONES DOE WILL ONLY BE REQUIRED TO TREAT THE VOLUME OF WASTE GENERATED, RETRIEVED AND/OR IN STORAGE. IF THE ACTUAL VOLUME OF NEWLY GENERATED OR RETRIEVED CH-MLLW COVERED BY THIS MILESTONE IS SIGNIFICANTLY MORE THAN THE ESTIMATED VOLUMES THE PARTIES' MAY AGREE TO REVISE THESE REQUIREMENTS.

- 3. AFTER JUNE 30, 2009, DOE SHALL TREAT TO MEET LDR TREATMENT REQUIREMENTS ALL SMALL CONTAINERS OF NEWLY GENERATED CH-MLLW CONTAINING LDR CONSTITUENTS IN COMPLIANCE WITH WAC 173-303-140.

4. THERE ARE APPROXIMATELY 440 CUBIC METERS OF CH-TRUM IN PERMITTED STORAGE AT DOE'S CENTRAL WASTE COMPLEX (CWC) AND ELSEWHERE AT HANFORD AS OF 12/31/02. DOE'S CY 2002 LDR REPORT ESTIMATES THAT IT WILL GENERATE AN ADDITIONAL ANNUAL VOLUME OF APPROXIMATELY 220 CUBIC METERS OF CH-TRUM AND DOE ESTIMATES THEY WILL RETRIEVE APPROXIMATELY 1600 CUBIC METERS OF CH-TRUM BY 2010. CONSIDERING THESE ESTIMATES AND THE CONSIDERABLE UNCERTAINTY ASSOCIATED WITH THEM DOE SHALL TREAT THE WASTE CATEGORIES DESCRIBED ABOVE TO MEET LDR REQUIREMENTS ON THE FOLLOWING CUMULATIVE SCHEDULE:

- 700 CUBIC METERS BY 12/31/04;
- 1,800 CUBIC METERS (CUMULATIVE) BY 12/31/05;
- 3,000 CUBIC METERS (CUMULATIVE) BY 12/31/06;
- 4,200 CUBIC METERS (CUMULATIVE) BY 12/31/07;
- 600 ~~5,400~~ CUBIC METERS (CUMULATIVE) ~~BY 12/31/08~~ BETWEEN 10/1/2007 AND 9/30/2008;
- 6,600 CUBIC METERS (CUMULATIVE) BY 12/31/09;
- 7,600 CUBIC METERS (CUMULATIVE) BY 12/31/10;
- 8,600 CUBIC METERS (CUMULATIVE) BY 12/31/11.

IF THE ACTUAL VOLUME OF NEWLY GENERATED OR RETRIEVED CH-TRUM COVERED BY THIS MILESTONE IS LOWER THAN THE ESTIMATED VOLUMES ANTICIPATED BY THESE MILESTONES DOE WILL ONLY BE REQUIRED TO TREAT THE VOLUME OF WASTE GENERATED, RETRIEVED AND/OR IN STORAGE. IF THE ACTUAL VOLUME OF NEWLY GENERATED OR RETRIEVED CH-TRUM COVERED BY THIS MILESTONE IS SIGNIFICANTLY MORE THAN THE ESTIMATED VOLUMES THE PARTIES' MAY AGREE TO REVISE THESE REQUIREMENTS.

5. FOR CH TRANSURANIC WASTE NEWLY GENERATED ON OR AFTER 7/1/11 THAT IS DESIGNATED IN ACCORDANCE WITH WAC 173-303-070 THROUGH 100 AS MIXED AND AS CONTAINING LDR RESTRICTED CONSTITUENTS, DOE SHALL TREAT SUCH WASTES TO MEET LDR REQUIREMENTS PURSUANT TO WAC 173-303-140 WITHIN ONE YEAR OF GENERATION.

DOE MAY CHOOSE TO COMPLETE CERTIFICATION OF CH TRANSURANIC WASTE FOR DISPOSAL AT WIPP IN LIEU OF LDR TREATMENT, PROVIDED THAT ECOLOGY IS NOTIFIED IN WRITING OF SUCH COMPLETION OF CERTIFICATION, AND ONLY IF, AS OF THE TIME OF CERTIFICATION, SUCH WASTE IS EXEMPT FROM LDR

TREATMENT REQUIREMENTS WHEN DISPOSED AT WIPP. IF DOE CHOOSES TO CERTIFY IN LIEU OF TREATMENT, IT MAY MEET THE VOLUME REQUIREMENTS SPECIFIED IN THIS MILESTONE FOR ANY GIVEN YEAR BY CERTIFYING CH TRU OR CH TRUM., PROVIDED THAT ~~1) ALL CH TRUM IN PERMITTED STORAGE AS OF 12/31/02 IS TREATED TO MEET LDR REQUIREMENTS OR CERTIFIED BY 12/31/2006 AND 2) ALL CH TRUM IN PERMITTED STORAGE AS OF 7/1/11 IS TREATED TO MEET LDR REQUIREMENTS OR IS CERTIFIED BY 12/31/2011.~~

NOTE: THE REQUIREMENTS OF ITEMS 4 AND 5 OF THIS MILESTONE APPLY AS SET FORTH IN THE SETTLEMENT AGREEMENT BETWEEN THE UNITED STATES AND THE STATE OF WASHINGTON, DEPARTMENT OF ECOLOGY, DATED OCTOBER 23, 2003.

NOTE: IN THE EVENT THAT ITEMS 4 OR 5 BECOME APPLICABLE, AMOUNTS OF CH TRUM CERTIFIED BETWEEN 12/31/02 AND THE DATE ON WHICH ITEMS 4 OR 5 BECOME APPLICABLE SHALL COUNT TOWARDS SATISFACTION OF THE OBLIGATIONS IN ITEMS 4 AND 5.

6. EACH REQUIREMENT OF THIS MILESTONE IS CONSIDERED A DISTINCT WORK REQUIREMENT INDEPENDENTLY SUBJECT TO THE ENFORCEMENT PROVISIONS OF THE AGREEMENT.



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

08-AMCP-0232

JUL 24 2008

Ms. J. A. Hedges, Program Manager
Nuclear Waste Program
State of Washington
Department of Ecology
3100 Port of Benton
Richland, Washington 99354

Dear Ms. Hedges:

COMPLETION OF HANFORD FEDERAL FACILITY AGREEMENT AND CONSENT ORDER (TRI-PARTY AGREEMENT) INTERIM MILESTONE M-091-15, COMPLETE ACQUISITION OF FACILITIES AND/OR CAPABILITIES AND INITIATE TREATMENT OF RH MLLW AND CH MLLW IN LARGE CONTAINERS, AND INTERIM MILESTONE M-091-43, REQUIREMENT TO BEGIN TREATING RH MLLW AND LARGE CONTAINERS OF CH MLLW BY JUNE 30, 2008; AND INTERIM MILESTONE M-091-43, REQUIREMENT TO DESIGNATE ALL RH LOW-LEVEL WASTE CURRENTLY IN ABOVE GROUND PERMITTED STORAGE (AS OF JUNE 30, 2003) BY DECEMBER 31, 2008

The purpose of this letter is to notify the State of Washington Department of Ecology of completion of the subject Tri-Party Agreement Interim Milestone requirements. Tri-Party Agreement Interim Milestone M-091-15, for the acquisition of capabilities and the initiation of treatment for remote handled (RH) mixed low-level waste (MLLW) and large containers of contact handled (CH) MLLW per the rate stipulated in Tri-Party Agreement Interim Milestone M-091-43, due June 30, 2008, has been accomplished by acquiring commercial capabilities that have initiated treatment and are capable of treating at the minimum rate of 300 cubic meters per year. As of June 1, 2008, 330 cubic meters of Tri-Party Agreement Interim Milestone M-091-43 waste had been shipped for treatment and 213 cubic meters had been treated. Treatment to date has consisted primarily of macroencapsulation at commercial treatment facilities; however, other treatment such as stabilization and sorting for various treatment is also available. Sixty-three cubic meters of waste that had been treated through June 1, 2008, was RH waste with the remainder being large container waste. Initiation of treatment has also met the Tri-Party Agreement Interim Milestone M-091-43 requirement to begin treatment of this waste at a minimum rate of 300 cubic meters per year no later than June 30, 2008.

The Tri-Party Agreement Interim Milestone M-091-43 requirement to designate all RH low-level waste and large containers of CH low-level waste currently in above ground permitted storage (as of June 30, 2003) according to the requirements of WAC 173-303-070 through 100 by December 31, 2008, has also been completed. A review and update of stored waste

Ms. J. A. Hedges
08-AMCP-0232

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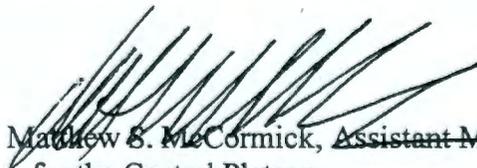
JUL 24 2008

designations was completed in 2007 as part of the disposition path planning process for Tri-Party Agreement Interim Milestones M-091-42 and M-091-43 MLLW. This review included the subset of waste covered by the Tri-Party Agreement Interim Milestone M-091-43 designation requirement as well as other stored waste.

A summary listing of the 330 cubic meters of Tri-Party Agreement Interim Milestone M-091-43 containers that have been shipped for disposition is available upon request and can be provided during the next M-91 Project Manager meeting.

If you have any questions, please contact me, or your staff may contact Larry Romine, of my staff, on (509) 376-4747.

Sincerely,



~~Matthew S. McCormick, Assistant Manager~~
for the Central Plateau

AMCP:GLS

cc: G. Bohnee, NPT
L. Buck, Wanapum
C. E. Cameron, EPA
N. Ceto, EPA
S. Harris, CTUIR
R. Jim, YN
S. L. Leckband, HAB
M. L. Mandis, Ecology
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K. M. Quigley, EFSH
C. J. Simiele, FHI
D. G. Singleton, Ecology
R. Skinnarland, Ecology
J. G. Vance, FFS
Administrative Record (M-91)
Environmental Portal

