

Meeting Minutes Transmittal

FFTF
Project Managers Meeting
825 Jadwin/Room 554
Richland, Washington
October 27, 2011

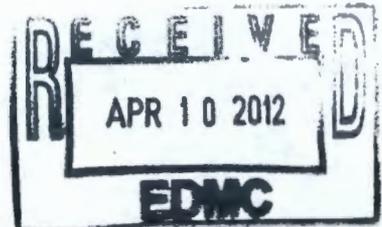
The undersigned indicate by their signatures that these meeting minutes reflect the actual occurrences of the above dated Project Managers Meeting. Signatures denote concurrence with the content only and are not intended to imply agreement to any commitments.

Fred H. Bond Date: 2/2/12
Project Manager Representative, Ecology

M. Eby Date: 02/09/12
Project Manager Representative, RL

Beth Date: 2/1/12
Project Manager Representative, CHPRC

- FFTF Administrative Record H6-08
- RA Almquist A3-04
- FW Bond H0-57
- DH Chapin A3-04
- ME Eby N2-57
- OA Farabee A5-11
- RA Kaldor A5-11
- DL Polzin N2-01



FFTF PROJECT MEETING MINUTES
Project Managers Meeting
825 Jadwin/Room 554/700 Area
Richland, Washington

October 27, 2011

- I. Approval of May 26, 2011 FFTF Project Meeting Minutes
 - A. The meeting minutes were approved.

- II. Administrative Issues
 - A. Introductions were made since there have been a number of changes in responsibilities within the contractor organization.

- III. Project Specific Issues
 - A. There were no project specific issues raised for discussion.

- IV. Milestone Status
 - A. Proposed target date for 400 WMU closure
Brian Dixon (CHPRC) initiated discussion regarding the proposed target date of September 30, 2018 for closure of the 400 Area waste management unit (WMU). Mr. Dixon stated that Rick Bond (Ecology) had requested consideration as to whether a milestone is needed for closure. Mr. Dixon noted that within the contract organization there are no milestones for other closures. Mr. Bond stated that there had not been any further internal discussions since DOE-RL provided the draft target milestone at the last PMM. Mr. Bond suggested that the parties take no further action on the target milestone and continue operating as long as needed. Mr. Bond added that when the disposition of the sodium is determined through the 2018 milestone, then the parties can make a decision regarding closure.

Doug Chapin (DOE-RL) noted that the reasons for the September 30, 2018 date is because that date is embedded in some of the sodium milestone documents. The September 2018 date is to allow the time frame to accommodate the decisions that come out of the tank closure Environmental Impact Statement (EIS) relative to FFTF end state and the Hanford Site sodium. Mr. Chapin reported that an initial draft review of the EIS was conducted at DOE Headquarters last week.

- V. New Topics
 - A. 400 Area WMU Inspection
Joel Williams, Jr. (CHPRC) stated that this topic was being forward after an inspection in the 400 Area that was conducted by Ecology in September 2011. During inspection of the two waste management units within the TSD (FSF Building and ISA), Ecology asked why the frequency of inspections was changed from weekly to semi-annually. Mr. Williams stated that the issue has been discussed with Mr. Bond and Mr. Chapin because there has been some indication by Ecology on the inspection side that the change in the frequency of inspection may be some type of violation. Mr. Williams provided a handout during today's PMM that included

a response to Ecology's question, an attendance roster for the inspection, and the permit modification form that was signed by Ecology on March 24, 2009. Mr. Williams stated that when the change of inspection frequency was pursued as a Class 1 prime instead of a Class 1 permit modification, an investigation was conducted and various meetings were held before submitting the Class 1 prime permit mod to Ecology. Mr. Williams noted that a Class 1 prime requires approval from Ecology prior to preparing the paperwork. As noted above and in the handout, Ecology approved the Class 1 prime permit mod.

Mr. Williams stated that the issue has been raised as to whether the permit mod should have been a Class 2 and not a Class 1 prime. Mr. Williams stated that based on the write-up provided today and other discussions with Ecology, DOE-RL and CHPRC maintain they are well within the justification to do a Class 1 prime for two reasons: 1) the facility is in a cold and dark status and the surveillance and maintenance (S&M) plan is being followed; 2) there is onsite precedent with the surveillance required for PUREX tunnels, the PUREX plant, and B Plant.

Mr. Bond stated that an internal meeting with the compliance team is scheduled next week to discuss the issue. Mr. Williams asked if Mr. Bond had a concern about the justification for the Class 1 prime. Mr. Bond stated that the regulations clearly state that it is a Class 2 when the frequency in inspections is reduced. Mr. Bond noted that he was not involved with the decision to do a Class 1 prime, and asked about the justification at the time for making the decision. There was a brief discussion about what the justification might have been at the time. Mr. Williams pointed out the Washington Administrative Code (WAC) that was cited in approving the Class 1 prime as 173-303-830, Appendix I, subsection A.8, which states: Changes to remove permit conditions that are no longer applicable (i.e., because the standards upon which they are based are no longer applicable to the facility).

Mr. Bond asked if the weekly inspection is what is considered no longer applicable. Mr. Dixon responded that the justification is stating that weekly inspections are not applicable. Dave Gray (CHPRC) stated that when the change in inspection was being made, the environmental compliance officer (ECO) at that time (Mark Eby) indicated that the main reason for the change was because the activity level had dropped to zero. When weekly inspections were done, the WMU was being actively loaded and work was being conducted routinely. Once the WMU was completely loaded and there was no more material to put in, there was no activity and the material was sitting in storage. Mr. Gray added that if any activity was started up, then the weekly inspections would have to be initiated. Mr. Dixon noted that there has been a lot of discussion about the rationale for a semi-annual inspection versus a weekly inspection, but there hasn't been much discussion about why subsection A.8 was used rather than another provision that maybe would have triggered a Class 2. Mr. Bond noted that the Class 1 prime was approved by Ecology and that he has no objection to the semi-annual inspection, but his question was why the inspection was approved as a Class 1 prime.

Mr. Bond also noted a question about the semi-annual inspection for the ISA (outdoor storage area), where the material is stored inside a sealed Conex box and it would require some effort to open it up to inspect on a weekly basis. Mr. Bond stated that there has been some discussion within Ecology that it makes good sense to not go into the FSF, which is a containment building, on a weekly basis. Tony McKarns (DOE-RL) stated that maintaining consistency with the FSF

and the ISA makes sense from a record-keeping aspect and the ability to maintain control if the inspections are conducted at the same time.

Mr. Chapin stated that his recollection of discussion with Mr. Eby supports Mr. Gray's summary of the reason for reducing the inspection frequency, and that he and Mr. Eby worked with Greta Davis (Ecology) on the issue. Mr. Chapin added that the S&M plan, which is a TPA milestone, has a key requirement to maintain compliance with the 400 Area WMU. The change from weekly to bi-annual inspections should be documented in the S&M plan or in the work control procedures. Mr. Chapin noted that the inspection is for the entire 400 Area WMU, and he questioned how inspection of the FSF and/or versus the ISA area could be piecemealed. Mr. McKarns agreed with Mr. Chapin argument against piece mealing the inspection.

Mr. Bond asked if anyone looks at the ISA area weekly. Mr. Gray stated that there is no informal inspection done, other than a monthly check of the fire extinguisher that is hanging on the fence. It was noted that inspection of the fire extinguisher is a fire requirement separate from the WMU requirements. Mr. Bond asked about the argon in FFTF. Mr. Gray responded that the power operators send him their log readings on the argon every week, and he plots the readings on an Excel file. If an increase in argon is noted over a period of time, an investigation would be done. If there was a big leak of argon, there would be an immediate alarm. Mr. Chapin stated that during Ecology's inspection in September, the detection system for the argon was explained in detail in response to Ecology's question, and Ecology seemed to acknowledge and understand the response at the time.

Mr. Bond initiated a discussion regarding the sodium potassium (NAK) issue that was brought up during Ecology's September 2011 inspection of the 400 Area. Mr. Bond stated that the Ecology compliance team is questioning why the NAK is not being dealt with now. Mr. Bond indicated that it would be more practical to deal with the NAK at the same time the rest of the sodium is dispositioned since the NAK is such a small amount and the same equipment would be used. Mr. Chapin noted that in the ongoing tank closure EIS, a decision has not been made to disposition the sodium residuals, which would include the NAK. Mr. Chapin added that DOE-RL is precluded from doing anything until the NEPA Record of Decision (ROD) is issued for the overall FFTF end state, the sodium management, and completing deactivation of the sodium residuals, of which the NAK is included.

Mr. Bond initiated discussion regarding the inclusion of the NAK in the SEPA checklist, and that there are several updated SEPA checklists that Ecology has not received from DOE-RL. Mr. Chapin stated that he has informally provided comments to Ecology on the SEPA checklist, and he is working through the system to resolve the issue. Mr. Chapin noted that one comment from DOE-RL is that the SEPA checklist is the responsibility of Ecology. Mr. Bond indicated that the NAK addition to the SEPA checklist was supposed to come from DOE-RL. Mr. Chapin suggested that CHPRC and the respective DOE-RL program team ensure their involvement in the review of the SEPA checklist for the Hanford permit. Mr. Dixon took an action to follow up on the CHPRC side for the SEPA checklist to ensure it is being tracked and sent to the appropriate people for review. Mr. Bond stated that he will follow up with Cliff Clark (DOE-RL) and Steve Weil (DOE-RL).

VI. New Action Items

- A. Mr. Chapin provided an update on his action from the May 2011 PMM to set up a walk-down of the FFTF facility with Mr. Bond. A formal tour has not been done; however, Mr. Chapin noted that Mr. Bond is always present during the annual S&M. Mr. Chapin added that the annual S&M usually coincides with the contractor's bi-annual RCRA S&M (fall and spring), and the RCRA inspection covers about a two-week time frame. Mr. Gray and Max Edington (CHPRC) will notify Mr. Bond and Mr. Chapin when the RCRA inspection is to take place so they can participate.

Mr. Bond or an Ecology representative will contact DOE-RL following Ecology's meeting next week and provide an update on the frequency of inspection issue at the 400 Area WMU.

VII. Documents for the Administrative Record

- A. There were no documents identified for submittal to the AR.

VIII. Next Project Managers Meeting

- A. The next meeting was scheduled for April 26, 2012 at 8:00 a.m. Jenny Seaver (CHPRC) raised the issue of the potential for needing to prepare a permit modification, pending the outcome of Ecology's internal meeting next week regarding the inspection issue at the 400 Area WMU. Ms. Seaver stated that a PMM may be needed earlier than next April, depending on the outcome of Ecology's meeting. The parties agreed that a PMM could be scheduled earlier than April, if necessary, to discuss the issue. Tony Miskho (CHPRC) noted that a Class 1 quarterly modification for the contingency plans is being prepared, and the mods need to be signed off by December 31, 2011.