

START

0044011

**Meeting Minutes Transmittal/Approval
Tri-Party Agreement Milestone Review Meeting
EPA Conference Room
Medical Dental Center
March 26, 1996**

From/ Appvl.: Charles Hansen Date: 4/23/96
Charles Hansen, RL (H0-12)
IAMIT Representative

Appvl.: Michael Wilson Date: 4/25/96
Michael Wilson, Ecology
IAMIT Representative

Appvl.: Douglas R. Sherwood Date: 4/23/96
Doug Sherwood, EPA
IAMIT Representative

Prepared by Appvl.: Frank T. Calapristi Date: 4/25/96
Frank T. Calapristi
Westinghouse Hanford Company



Attendees

Alexander, S. M.	Ecology	B5-18	Jaraysi, M. N.	Ecology	B5-18
Baker, T. L.	WHC	T3-01	Killooy, S. E.	WHC	S4-66
Black, D. G.	WHC	H6-20	Lundstrom, D.	Ecology	B5-18
Bowman, R. C.	WHC	H6-24	Mattlin, E. M.	RL	A5-15
Britton, M. K.	WHC	B3-56	Miera, F. R.	RL	A5-15
Brulotte, P. J.	WHC	B3-56	Rasmussen, J. E.	RL	A5-15*
Bullard, S. E.	RL	A2-27	Robbins, E. D.	WHC	S4-66
Calapristi, F. T.	WHC	B2-35*	Sherwood, A. R.	WHC	H6-20
Cusack, L. J.	Ecology	B5-18	Sherwood, D. R.	EPA	B5-01
Diliberto, A. J.	WHC	H6-10	Stanley, R.	Ecology-Olympia	
Einan, D. R.	EPA	B5-01	Stevenson, M. W.	WHC	B2-35
Furman, M. J.	RL	H4-83	Tebb, G. T.	Ecology	B5-18*
Greager, E. M.	WHC	H6-20	Teynor, T. K.	RL	S7-55
Gonzalez, R. X.	RL	R3-79	Tilden, H. T.	PNNL	P7-79
Hall, M. J.	WHC	T6-12	Waring, J. J.	RL	S7-55
Holt, R. G.	RL	S7-41	Wilson, M. A.	Ecology	B5-18*
Huckaby, A. D.	Ecology	B5-18*	York, M. T.	WHC	H6-25*
Jackson, D. E.	RL	A5-15	EDMC	WHC	H6-08*

cc:
L. K. McClain RL H4-83
J. E. Mecca RL R3-79
L. L. Piper RL R3-78

* W/Attachments

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Meeting Minutes
TPA Milestone Review Meeting
EPA Conference Room
Medical Dental Center
March 26, 1996

1. **M-33 Change Package / SW Facilities (Attachment 1)**

RL opened the discussion and presented an update of the M-33-00 negotiations between RL and Ecology. RL added the negotiations are scheduled to resume tomorrow. Three new major milestones are being contemplated and the negotiations have produced several proposals and counter-proposals. Ecology is reviewing the last RL counter-proposal and will withhold comments until tomorrow's negotiations. It was noted that negotiations will extend into June 1996 and will require the AIP to be modified.

2. **M-18-00 and M-19-00 WRAP I and II (Attachment 2A)**

During the presentation, RL noted the WRAP II LLMW Stabilization Services Contract Award, scheduled for June 1996 may slip because of unanticipated problems. However, RL said this will not affect the treatment schedule. In the "Issues" discussion, RL reported the Change Request (CR) M-18-95-01 as approved by Ecology. The CR revised the due date to 6/30/96. Ecology asked about WHC's legal concern in the language of the M-19 CR where "Ecology" is identified. WHC legal recommended to change the word to "regulators". There was some question as to the current location of the CR and RL said Ecology has it. Ecology will investigate and then added they will proceed with the "single regulator" concept.

The next topic was John Wagoner's (RL) CR M-19-95-01 transmittal letter to M. Riveland (Ecology) and C. Clark (EPA). Ecology said the CR was not approved (Attachment 2B). RL and Ecology will meet and determine the next step.

The WRAP I Construction status was discussed and RL will send a report to M. Jaraysi (Ecology) by March 27, 1996.

3. **M-26-01 LDR Report (Attachment 3)**

The LDR report was reported on schedule for delivery to the regulators by April 30, 1996.

4. M-34-00 Spent Nuclear Fuel (Attachment 4)

The presentation opened with the Contractor Performance Review; all categories were reported "Good". It was noted by RL that the ROD for the K-Basins EIS was issued on March 4, 1996. A change request proposing new interim and target milestones will be issued to Ecology about May 1, 1996.

When discussing "Issues", RL reported PCB was found in some areas of K-East Basins. RL and the regulators are currently discussing technical and regulatory issues associated with the sludge.

In the subsequent discussion, the following action was assigned.

Action: RL to provide Ecology with a copy of the Tom Grumbly letter "Points of Agreement Negotiation Guidance."

Resp.: Jim Rasmussen **Date:** 3/29/96

5. M-35-00 Data Management (Attachment 5)

RL reported the M-35-07 milestone due on March 31, 1996 was completed. The transmittal letter of milestone completion is now in RL management concurrence. RL also recommended TPA milestones M-35-08 due in June 1996 and M-35-09 due in 1998 and beyond, should be deleted. RL believes the actions required for these milestones are redundant with ongoing daily activities and provide no added value. RL will be discussing this proposal with the regulators in the next few weeks to reach an agreement.

6. M-24-00 Groundwater Wells (Attachment 6)

RL reviewed the M-24-00 well drilling requirements and followed up with a performance rating of the contractor. All performance categories were rated "Good" to "Outstanding".

RL Planned Actions include the installation of one well identified for FY 1996. There is also a goal to reach agreement with Ecology on ten TSD's as compliant or to identify new groundwater well locations for monitoring well networks.

The regulators asked what RL program is leading the groundwater effort, ER or WM? RL said all groundwater effort is under the ER program and starting in FY 1998, all ADS funding will be consolidated under the ER program.

When discussing "Issues", RL recommended discontinuing the quarterly M-24-00 milestone briefings and provided several justifications. RL added the current compliance monitoring strategies do not reflect the M-24-00 milestone requirements which are driven by rate and schedules. However, Ecology recommended the briefing should continue.

7. M-32-00 Waste Tanks/Corrective Actions (Attachment 7)

The presentation opened with a review of Accomplishments, Planned Actions and Milestone Assessment. Under the "Issues" discussions, two topics were discussed.

- **B-Plant (Change Request M-32-07-T05)**

It was noted the milestone due date of June 1996 may be missed because of technical difficulties in reducing the radionuclides. It is still possible to meet the June date but RL said in the event the work is not completed, a change request will be issued to complete the work under the B-Plant deactivation activities. The M-32-07-T05 milestone will be either deleted or declared "Complete".

- **219-S (M-32-02/Project W-178)**

Because of higher than anticipated close rates and the resulting increased costs, the milestone completion date of September 1997 is in jeopardy. Additional funds will be needed to complete the milestone on schedule.

8. M-20-00 Part B and Closure Plans (Attachment 8)

RL made the presentation and there were no new issues or action items identified. At the conclusion of the presentation, Ecology said they understand there is a problem in scheduling the Building 325 Workshop to resolve Ecology's Part B comments. RL said the workshop will not be pursued at this time but will be scheduled in the future depending upon workload.

AGENDA
IAMIT TRI-PARTY AGREEMENT MILESTONE REVIEW
(CHAIRPERSON: D. R. SHERWOOD)

TUESDAY, MARCH 26, 1996

EPA CONFERENCE ROOM
 712 SWIFT BLVD., RICHLAND

<u>TIME</u>	<u>MILESTONE</u>	<u>TITLE</u>	<u>RL DIVISION DIRECTOR</u>	<u>CONTRACTOR MGR.</u>	<u>PRESENTER</u>
8:30 am	M-33-00	CHANGE PKG./SW FACILITIES	T. K. Teynor	S. T. Smith	J. Rasmussen
	M-18-00	WRAP I	T. K. Teynor	D. E. McKenney	R. F. Guercia
	M-19-00	WRAP II	T. K. Teynor	D. E. McKenney	R. F. Guercia
	M-26-01	LDR REPORT	T. K. Teynor	J. K. Skolrud	R. F. Guercia
9:30 am	M-34-00	SPENT NUCLEAR FUEL	E. D. Sellers	G. C. Mooers	R. G. Holt
10:00 am	M-35-00	DATA MANAGEMENT	W. A. Rutherford	M. K. Britton	S. E. Bullard
10:15 am		BREAK			
10:30 am	M-24-00	GROUNDWATER WELLS	R. A. Holten	R. R. Thompson	M. J. Furman
10:50 am	M-32-00	WASTE TANKS/CORRECTIVE ACT'N	J. E. Rasmussen	E. M. Greager	E. M. Greager
11:15 am	M-20-00	PART B AND CLOSURE PLANS	J. E. Rasmussen	S. M. Price	E. M. Mattlin
11:45 am		LUNCH			

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ATTENDEES

TPA MILESTONE REVIEW

MARCH 26, 1995

EPA CONFERENCE ROOM
MEDICAL DENTAL CENTER

<u>NAME</u>	<u>ORGANIZATION</u>	<u>MAILSTOP</u>	<u>(✓) FOR ATTACHMENTS</u>
<u>F.T. CALAPRISTI</u>	<u>WHC/TPAI</u>	<u>B2-35</u>	<u>✓</u>
<u>DALE JACKSON</u>	<u>DOE-RL/EAP</u>	<u>A5-15</u>	
<u>T.L. BAKER</u>	<u>WHC</u>	<u>T3-01</u>	
<u>Joe Warrick</u>	<u>DOE-RL/WPD</u>	<u>S7-55</u>	
<u>Steve Alexander</u>	<u>Ecology</u>	<u>B5-18</u>	<u>✓</u>
<u>Laura Cusack</u>	<u>Ecology</u>	<u>B5-18</u>	
<u>Moses Jazayji</u>	<u>Ecology</u>	<u>B5-18</u>	
<u>Tom Teynor</u>	<u>DOE-RL/WPD</u>	<u>S7-55</u>	
<u>Dale Black</u>	<u>WHC/ES</u>	<u>H6-20</u>	
<u>Mark Stewart</u>	<u>WHC/TPAI</u>	<u>B2-35</u>	
<u>Doug Sherwood</u>	<u>EPA</u>	<u>B5-01</u>	
<u>Joe Lundstrom</u>	<u>Ecology</u>	<u>B5-18</u>	
<u>Felix R. Miera</u>	<u>DOE-RL-EAP</u>	<u>A5-15</u>	
<u>Rever Stanley</u>	<u>Ecology</u>		

ATTENDEES

TPA MILESTONE REVIEW

MARCH 26, 1995

EPA CONFERENCE ROOM
MEDICAL DENTAL CENTER

<u>NAME</u>	<u>ORGANIZATION</u>	<u>MAILSTOP</u>	<u>(✓) FOR ATTACHMENTS</u>
Mike Wilson	Ecology		✓
Jim Rasmussen	RL/EAP		✓
Bob Holt	RL/SFD	57-41	
G. THOMAS TEBB	Ecology	B5-18	✓
S Bullard	RL-SID	12-27	
MK Britton	WNC	B3-56	
PJ BRULOTTE	"	"	
Dave Einar	EPA		
mike York	WNC	H6-29	X
M. J. Fukumori	D.S. + U.S. + I.	H4-83	
A.J. DiIorio	WNC	H6-10	
Rick Gonzalez	DOERL	R3-79	
Eric Greager	WTR	H6-20	
MICHAEL J. HALL	WNC / LABS	T6-12	

TPA MILESTONE REVIEW

M-33

**Presented by: Felix Miera, EAP/DOE and
Moses Jaraysi, Ecology**

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Status of Negotiations

- **Negotiations started early February 1996**
- **Stakeholders invited to opening and periodic ongoing discussions**
- **Ecology provided a draft counter proposal to DOE on March 1, 1996**
- **DOE provided a draft counter proposal to Ecology on March 21, 1996**

Status of Negotiations (continued)

- **Modification proposed to original Agreement in Principle (June 1995) for completion of negotiations by June 14, 1996 (Goal: mid-May 1996)**
- **Public involvement to follow after completion of negotiations**

WRAP I - WRAP II
M-18-00 & M-19-00

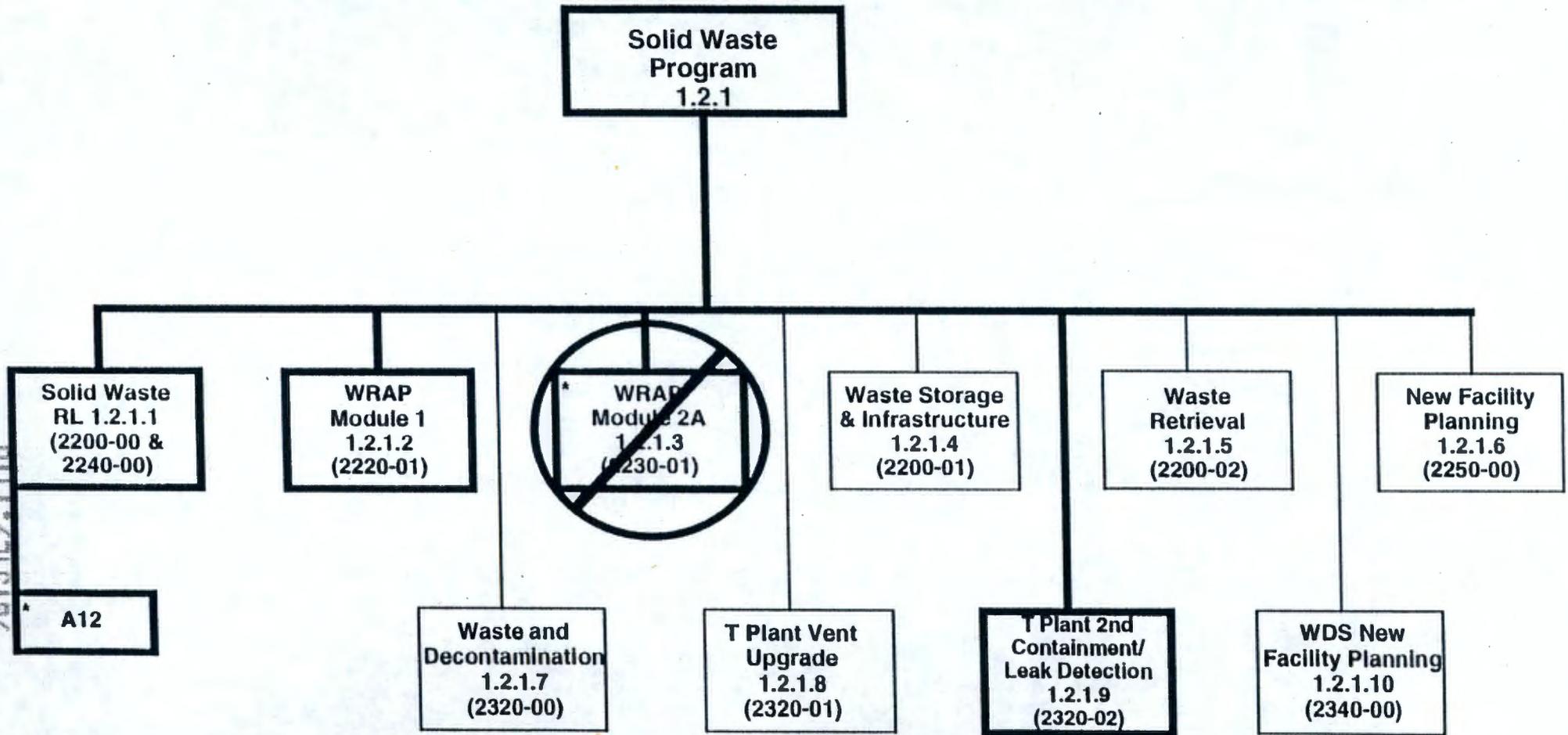
WASTE PROGRAMS DIVISION

R. F. Guercia

February 1996

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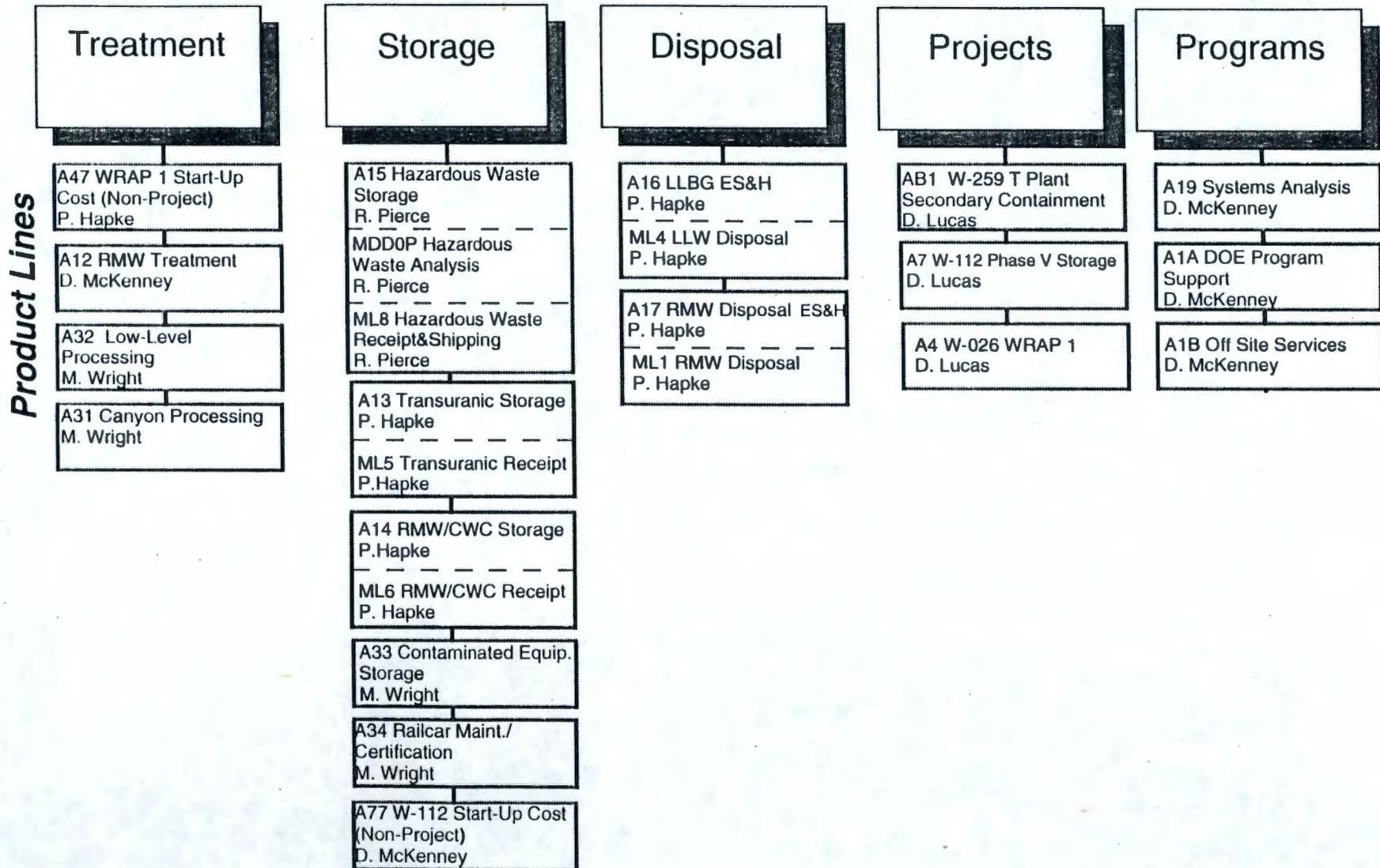
Work Breakdown Structure



*WRAP 2A has been terminated. The M-19 change request is in process to replace WRAP 2A treatment capability with commercial treatment services.

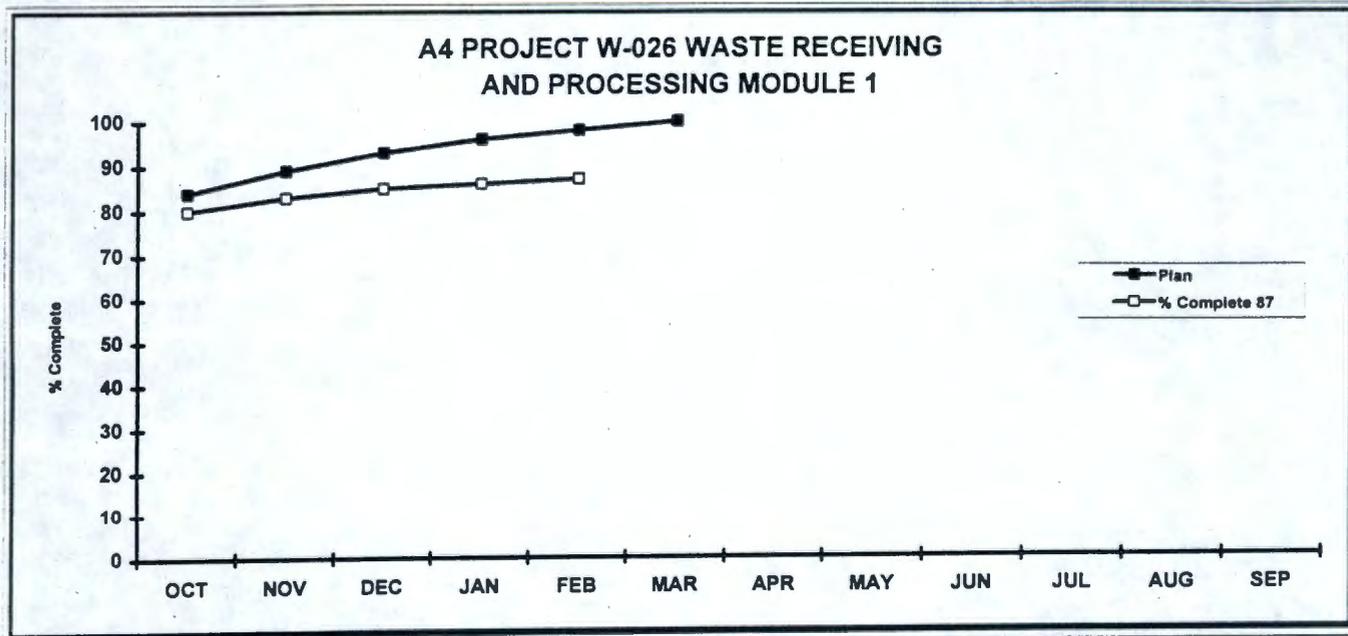
FY 1996 Solid Waste Program Product Lines

Product Groups

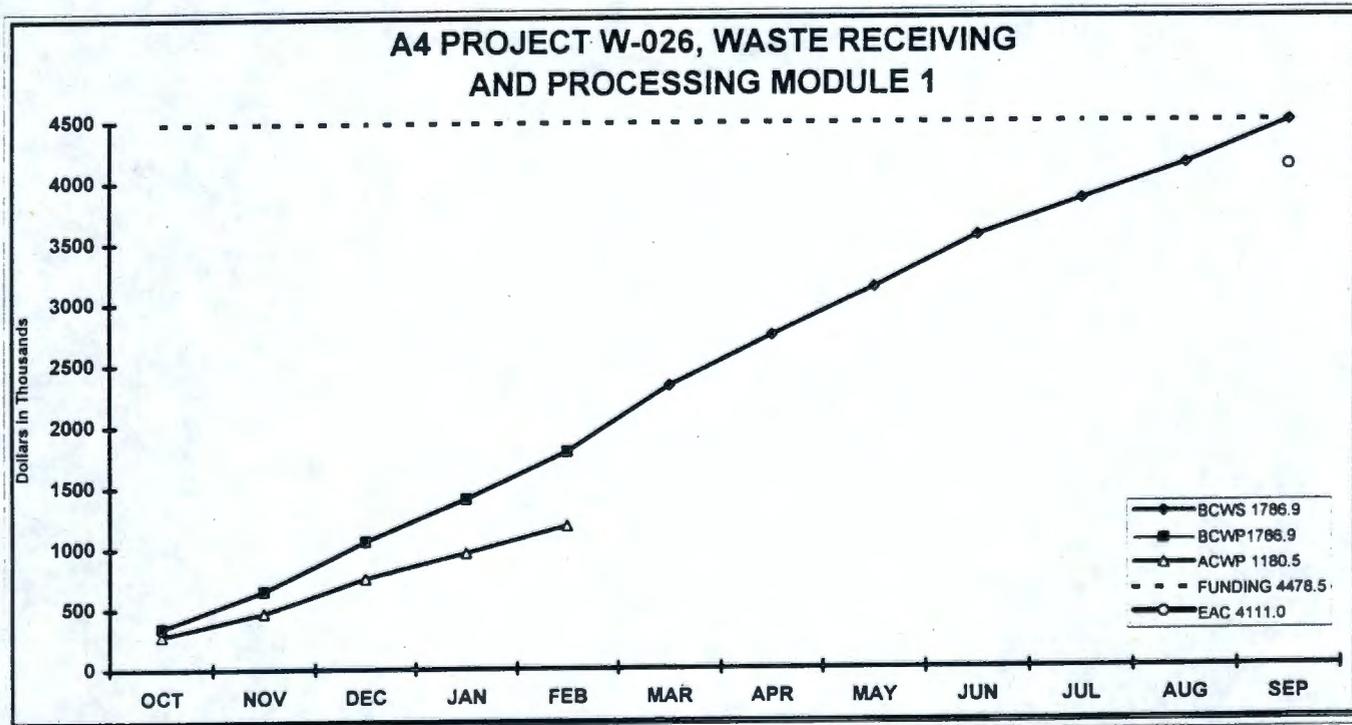


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SWD PRODUCT LINES FY 1996

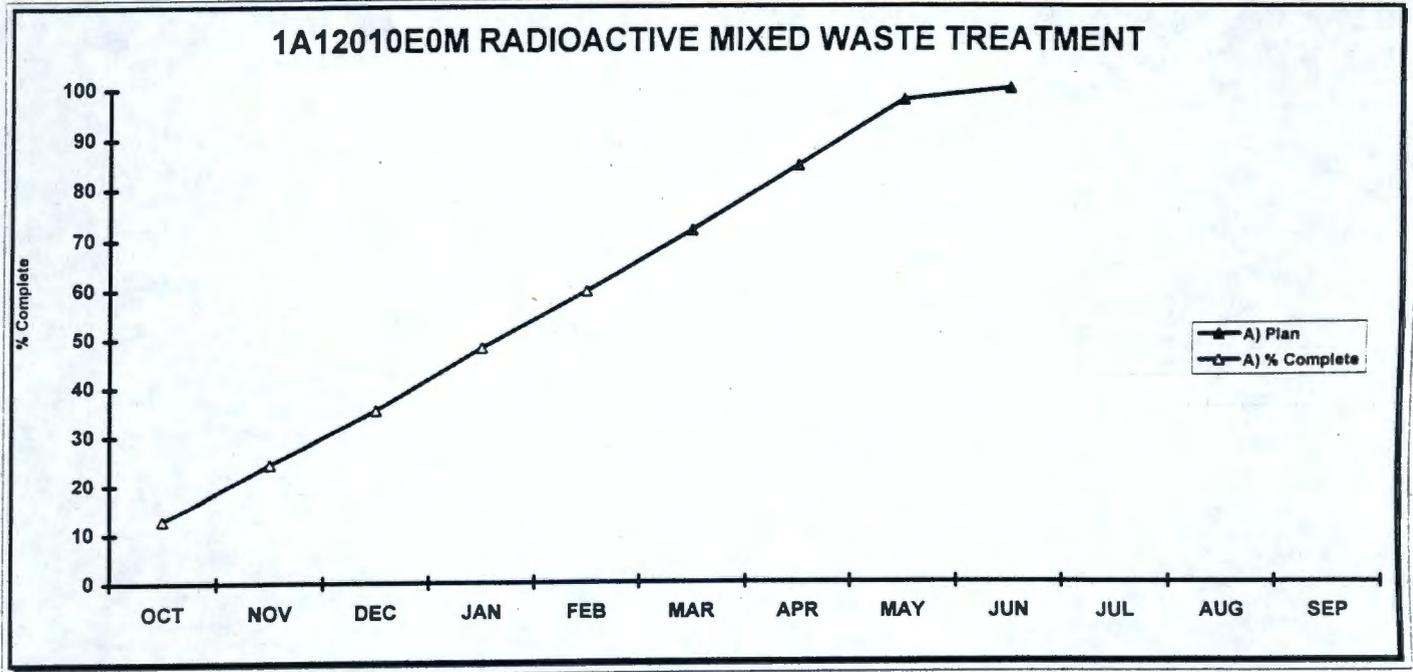


Complete construction of WRAP 1 by March 31, 1996.

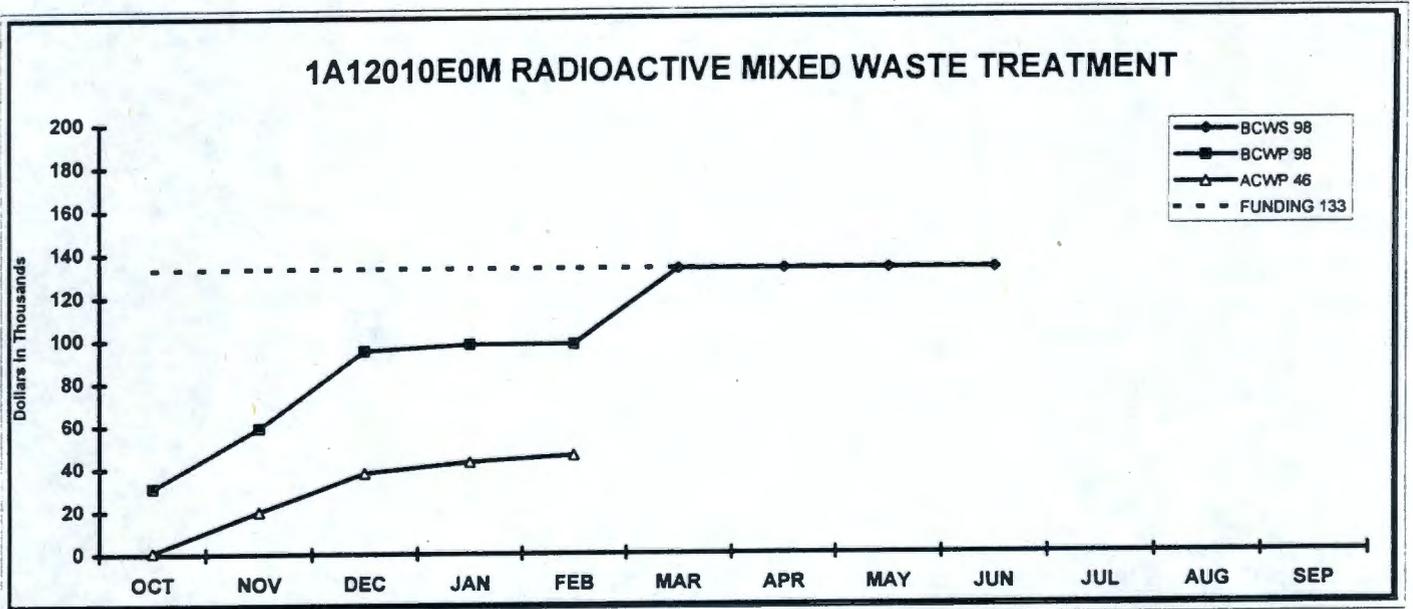


	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP.
CUM BCWS	348	651	1058	1404	1787	2324	2734	3122	3546	3840	4130	4477
CUM BCWP	348	651	1058	1404	1787							
CUM ACWP	281	468	756	963	1181							

SWD PRODUCT LINES FY 1996



Issue WHC-approved radioactive mixed waste stabilization purchase order by 06-14-96.



	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP
CUM BCWS	31	59	95	98	98	133	133	133	133	0	0	0
CUM BCWP	31	59	95	98	98							
CUM ACWP	1	20	38	43	46							

SITE MANAGEMENT
SYSTEM

WESTINGHOUSE HANFORD COMPANY
1.2.1 SOLID WASTE PROGRAM

FEBRUARY 1996

MILESTONE EXCEPTION REPORT

FUTURE MILESTONES IN JEOPARDY

<u>Number</u>	<u>Type</u>	<u>Title</u>	<u>Scheduled Date</u>	<u>Forecast Completion Date</u>	<u>Cause/Impact Recovery Plan</u>
M-19-01	TPA	Complete WRAP 2A construction	9/30/98	Deleted	CR M-19-95-01 will delete M-19-01 in favor of other treatment strategies including commercial treatment.
M-19-00	TPA	Complete WRAP 2A construction and initiate operations.	9/30/99	9/30/99	Commercial treatment will begin 9/30/99, replacing milestone M-19-00.

NOTE: CR M-19-95-01 has been agreed to by the regulators and is in the formal approval process.

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PROGRAM ACCOMPLISHMENTS

WBS

1.2.1.2

WRAP 1 (2336-W FACILITY)

The Data Management System (DMS) implementation was completed in February 1996 with formal performance testing planned for March 1996. The DMS development server has been transferred and installed in the 200 West Area.

All of the components for drum and box nondestructive examination (NDE) have arrived at the facility. Installation of the conveyors, manipulators, and imaging equipment has been completed on both drum NDE systems. Conveyors, manipulators, and imaging equipment for the box NDE system is currently being installed.

The boxed waste assay system was assembled in February 1996 and installation of the associated electrical is planned to be completed in April 1996.

Both imaging passive/active neutron drum assay systems were completely assembled in the facility during February 1996. Installation of the power and control cabling for the units is planned for completion in March 1996. This system will assess the amount of fissionable material contained in drum waste.

The first Part B Permit workshop with Ecology was held on February 6, 1996 and the format for future workshops was established. Part A and Chapter 1 were combined into a new chapter 1. It was also decided that details on future facility modules (WRAP 2A and 2B) be pulled out of the permit except for a summary in chapter 1. The next workshop is scheduled for March 28, 1996.

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**SITE MANAGEMENT
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**WESTINGHOUSE HANFORD COMPANY
1.2.1 SOLID WASTE PROGRAM**

FEBRUARY 1996

WRAP 2A

1.2.1.3

The final version of the Tri-Party Agreement CR M-19-95-01 has been negotiated with Ecology and EPA, and the CR is in the formal approval process. The CR allows treatment and/or disposal alternatives to WRAP 2A that will result in starting treatment within the time allotted to WRAP 2A, and treating waste quantities that exceed those planned for WRAP 2A.

Procurement of LLMW Stabilization services is on schedule for contract award in June 1996. Best and final offers were received from each bidder in early January. The contract award package has been completed by WHC procurement and submitted to RL for review and approval.

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SITE MANAGEMENT
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WESTINGHOUSE HANFORD COMPANY
1.2.1 SOLID WASTE PROGRAM

FEBRUARY 1996

EXPENSE COST PERFORMANCE

(\$ In Millions)

WBS (ADS)	FY TO DATE					AT COMPLETION					COMMENTS
	BUDGETED COST		ACTUAL COST	VARIANCE		BAC (1)	EAC (2)	FYSF (3)	EXPECTED FUNDS FY96 (4)	PROJECTED CARRYOVER WORKSCOPE	
	WORK SCHED	WORK PERF	WORK PERF	SCHED	COST	BCWS					
1.2.1.2 WRAP 1 (2220-01)	3.7	3.7	2.0	0.0	1.7	11.6	11.6	11.1	11.6	.5	Project terminated
1.2.1.3 WRAP 2A (2230-01)	0	0	0	0.0	0	0			0		
TOTAL	3.7	3.7	2.0	0	1.7	11.6	11.6	11.1	11.6	.5	

NOTES:

- (1) BAC represents BCWS.
- (2) Expected Funds include carryover \$0.3M.

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SITE MANAGEMENT
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WESTINGHOUSE HANFORD COMPANY
1.2.1 SOLID WASTE PROGRAM

FEBRUARY 1996

EXPENSE SCHEDULE VARIANCE ANALYSIS

WBS (ADS)	SCHEDULE VARIANCE (\$0M)	
1.2.1	<u>(Description and Cause:)</u> No current variance.	<u>(Impacts and Corrective Action:)</u>

9613429.1427

SITE MANAGEMENT
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WESTINGHOUSE HANFORD COMPANY
1.2.1 SOLID WASTE PROGRAM

FEBRUARY 1996

EXPENSE COST VARIANCE ANALYSIS

WBS (WBS)	COST VARIANCE \$1.7M	
1.2.1	<p><u>(Description and Cause):</u></p> <p>Cost variance is due to delayed contractor billings, impacts from delayed vendor information and potential savings from sharing of 10 CFR 835 compliance analysis with other projects.</p> <p>Staffing increase has been slower than planned because of the WRAP 1 construction delay.</p>	<p><u>(Impacts and Corrective Action):</u></p> <p>Impact: None</p> <p>Corrective Action: None required</p>

9613429.1428

SITE MANAGEMENT
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WESTINGHOUSE HANFORD COMPANY
1.2.1 SOLID WASTE PROGRAM

FEBRUARY 1996

CENRTC COST PERFORMANCE

(\$ In Thousands)

WBS (ADS)	PROJECT-TO-DATE					TOTAL B/A	COMMITTED (P/O, W/O)	UNCOMMITTED	COMMENTS
	BUDGETED COST		ACTUAL COST	VARIANCE					
	WORK SCHED	WORK PERF	WORK PERF	SCHED	COST				
1.2.1.2 (2220-01) WRAP Module 1									
Activity for Current Year Funded Equip.	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	\$161.1 Calibration and testing of BWAS
Activity for Prior Year Funded Equip.	392.5	286.7	286.6	(105.8)	0.1	447.7	0.0	161.1	
1.2.1.3 (2230-01) WRAP Module 2									
Activity for Current Year Funded Equip.	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	Class I change request is in approval cycle to transfer balance to ADS 2200-0.
Activity for Prior Year Funded Equip.	272.1	272.2	272.1	0.1	0.1	391.9	0.0	119.7	
TOTAL	664.6	558.9	558.7	(105.7)	.2	839.6	0.0	280.8	

NOTES: (1) Commitments include 14 percent G&A/SWS adder.

SITE MANAGEMENT
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WESTINGHOUSE HANFORD COMPANY
1.2.1 SOLID WASTE PROGRAM

FEBRUARY 1996

CONSTRUCTION COST PERFORMANCE

(\$ In Millions)

WBS (ADS)	PROJECT TO DATE						AMOUNT AUTH. TO DATE	AT COMPLETION (PROJECT)		COMMENTS
	BUDGETED COST		ACTUAL COST	VARIANCE		TOTAL ESTIMATED COST		PRESENT WORKING ESTIMATE		
	WORK SCHED	WORK PERF	WORK PERF	SCHED	COST					
1.2.1.2 WRAP 1 (2220-01)	51.1	47.3	46.4	(3.8)	(.9)	53.6	53.6	53.6		
1.2.1.3 WRAP 2A (2230-01)	4.9	4.3	4.5	(0.6)	(0.2)	5.6	5.6	5.6	Project terminated.	
TOTAL	56.0	51.6	50.9	(4.4)	.7	59.2	59.2	59.2		

9613429.1430

SITE MANAGEMENT
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WESTINGHOUSE HANFORD COMPANY
1.2.1 SOLID WASTE PROGRAM

FEBRUARY 1996

CONSTRUCTION SCHEDULE VARIANCE ANALYSIS

WBS (ADS)	SCHEDULE VARIANCE \$(4.4M)	
1.2.1	<u>(Description and Cause:)</u> Variance is within established thresholds.	<u>(Impacts and Corrective Action:)</u>

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SITE MANAGEMENT
SYSTEM

WESTINGHOUSE HANFORD COMPANY
1.2.1 SOLID WASTE PROGRAM

FEBRUARY 1996

CONSTRUCTION COST VARIANCE ANALYSIS

WBS (WBS)	COST VARIANCE (\$.7M)	
1.2.1	<u>(Description and Cause:)</u> Variance is within established thresholds.	<u>(Impacts and Corrective Action:)</u>

9613429.1432

SITE MANAGEMENT SYSTEM	WESTINGHOUSE HANFORD COMPANY 1.2.1 SOLID WASTE PROGRAM	FEBRUARY 1996
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ISSUES

WBS NO.	DATE IDENT	ISSUE	IMPACT	STATUS
1.2.1.2		<p><u>WRAP 1 CONSTRUCTION SCHEDULE</u></p> <p>The delay in glovebox fabrication has impacted the schedule for completion of construction.</p>	<p>Tri-Party Agreement Milestone M-18-01, "Complete Construction of WRAP Module 1" is changed from 3/31/96 to 6/30/96.</p> <p>The major milestone, M-18-00, Initiate WRAP 1 Operation by 3/31/97, will not be impacted by this change.</p>	<p>CR M-18-95-01 has been approved by Ecology. The CR revises the due date for milestone M-18-01 to 6/30/96.</p> <p>This issue is resolved.</p>
1.2.1.3	10/94	<p><u>WRAP 2A HAS BEEN TERMINATED</u></p> <p>CR M-19-95-01 proposes alternatives to constructing WRAP 2A, including commercial treatment.</p>	<p>The change request proposes treatment and/or disposal alternatives that will result in starting treatment within the time allotted to WRAP 2A, and treating waste quantities that meet or exceed those planned for WRAP 2A.</p>	<p>The FY 1996 MYPP contains funds adequate to support CR M-19-95-01 as submitted to Ecology. The CR has been verbally approved by Ecology and is in the formal approval process.</p>

9613429.1433

9613429.1434

(ATTACHMENT 2B)



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Mail Stop PV-11 • Olympia, Washington 98504-8711 • (206) 459-6000

March 11, 1996

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

Mr. John Wagoner, Manager
U. S. Department of Energy
Richland WA 99352

Dear Mr. Wagoner and Mr. Clarke:

Please note enclosed Tri Party Agreement change request M-19-95-01: "REVISE M-19 MILESTONES TO ALLOW FOR ALTERNATE TREATMENT AND DIRECT DISPOSAL OPTIONS FOR LOW LEVEL MIXED WASTES." This change request was forwarded to me by U.S. Department of Energy (DOE) letter dated March 1, 1996. I am returning it to you disapproved for the following reasons:

- 1.) This proposed major milestone modification can not be approved by the Parties prior to an opportunity for public comment. Please note, however, that Ecology believes that these proposed modifications are appropriate (See exception noted below). We hope to approve these same changes following public review.
- 2.) In addition to the above, I note that minor corrections to this (M-19-00) copy have been discussed between and agreed to by the three parties. These changes are restricted to minor modifications necessary in order to accurately reflect implementation of the Lead Regulatory Agency concept.

Should you have any questions regarding this matter, please feel free to call me or Mr. Moses Jaraysi of Ecology's Kennewick staff (509) 736 3016.

Mary Riveland

Mary Riveland
Director

cc: Administrative Record

9613429.1435



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

MAR 01 1996

96-SWT-036

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

RECEIVED
MAR 07 1996
DEPARTMENT OF ECOLOGY
OFFICE OF DIRECTOR

Dear Mr. Clarke and Ms. Riveland:

CHANGE REQUEST M-19-95-01: "REVISE M-19 MILESTONES TO ALLOW FOR ALTERNATE TREATMENT AND DIRECT DISPOSAL OPTIONS FOR LOW-LEVEL MIXED WASTES"

Enclosed for your approval is Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) Change Control Form M-19-95-01: "Revise M-19 Milestones to Allow for Alternate Treatment and Direct Disposal of Low-Level Mixed Wastes." This change request has been discussed extensively with the State of Washington, Department of Ecology staff and agreed to in draft form.

Should you have any questions regarding this matter, please feel free to call me on (509) 376-7395 or Mr. T. K. Teynor, of the Waste Programs Division, on (509) 376-1366.

Sincerely,

John D. Wagener
John D. Wagener
Manager

WPD:KDB

Enclosure

cc w/encl:
L. Arnold, WHC
W. Hamilton, Jr., WHC
M. Jaraysi, Ecology
D. Sherwood, FPA
R. Stanley, Ecology
M. Wilson, Ecology

Change Number N-19-95-01	Federal Facility Agreement and Consent Order Change Control Form	Date December 20, 1995
Originator T. L. Baker		Phone (509)376-5681
Class of Change <input checked="" type="checkbox"/> I - Signatories <input type="checkbox"/> II - Executive Manager <input type="checkbox"/> III - Project 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 would 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 (FY) 2002.</p> (continued)		
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, M-19-00, "Complete WRAP Module II Construction and Initiate Operations," due September 1999, 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 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.)		
Approvals <div style="display: flex; justify-content: space-between;"> <div style="width: 30%;"> <p><i>[Signature]</i> Date <u>5/11/96</u></p> </div> <div style="width: 40%;"> <p><input checked="" type="checkbox"/> Approved <input type="checkbox"/> Disapproved</p> </div> </div>		
EPA <div style="display: flex; justify-content: space-between;"> <div style="width: 30%;"> <p><i>[Signature]</i> Date _____</p> </div> <div style="width: 40%;"> <p><input type="checkbox"/> Approved <input type="checkbox"/> Disapproved</p> </div> </div>		
Ecology <div style="display: flex; justify-content: space-between;"> <div style="width: 30%;"> <p><i>[Signature]</i> Date _____</p> </div> <div style="width: 40%;"> <p><input type="checkbox"/> Approved <input checked="" type="checkbox"/> Disapproved</p> </div> </div>		

Hanford Federal Facility Agreement and Consent Order
Change Control Form M-19-96-01

Description/Justification (cont.)

The new strategy will utilize a combination of several different approaches as described below:

1. Contracts with commercial firm(s) to provide stabilization of Contact Handled Low Level Mixed Waste (CH-LLMW) on a fixed unit price basis. These contracts 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 per approach 2 and/or via a second commercial contract for treating high mercury subcategory waste as discussed in approach 4. Contracts will be maintained (extended or recompleted) until no longer needed to meet regulatory requirements. The stabilization contract will require that treatment begin during September 1999, and continue for a base period of five years with five optional one-year extensions.
2. 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.
3. 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 KMW landfill. Preliminary testing has shown that these streams, previously categorized as requiring additional treatment, will meet LDR treatment standards. 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 by the regulators will default to the commercial contract for treatment.
4. In addition, additional contracts may be let for treatment services for small quantities of waste not within the scope of the WRAP 2A project or for high mercury waste (discussed in approach 1) which is not included in the stabilization contract.

The revised M-19 milestones use the WRAP-2A treatment plan (Ref: WHC-SD-W100-RD-001 Rev-1, Waste Receiving and Processing Module 2A, Feed Specification, November 1994) as the basis for the type and volume of waste to be treated and/or disposed. This basis was used in the WRAP-2A requirements document (Ref: WHC-SD-W100-FDC-001 Rev-2, Functional Design Criteria, Waste Receiving and Processing Facility Module 2A, Project W-100, October 1993) to establish a 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.

Description/Justification (cont.)

This new strategy will be consistent with the site treatment planning approach prescribed by the Federal Facilities Compliance Act and with offsite generator Site Treatment Plans approved prior to October 6, 1995.

Revised Milestones

Delete existing Milestones M-19-00 and M-19-01 as follows:

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

Add revised Milestones M-19-00 and M-19-01 as follows:

M-19-00 Complete treatment/and or direct disposal of at least 1,644 cubic meters of Contact Handled Low Level Mixed Waste already in storage as of October 1, 1995 as well as newly generated Hanford Site low level mixed waste. September 2002

Cumulative treatment and/or direct disposal rates will be at least 246 cubic meters by the end of FY 2000, 822 cubic meters by the end of FY 2001, and 1,644 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.

For the purpose of these M-19 series milestones, direct disposal of low-level mixed waste via use of the waivers and variances described below, will be considered equivalent to treatment.

M-19-01 Initiate Treatment of Contact Handled Low Level Mixed Wastes September 1999

Treatment of Contact Handled Low Level Mixed Waste will begin on or before September 30, 1999.

Additional Target Dates and Interim Milestones are established as follows:

M-19-01-T01 Complete the determination of the level of NEPA documentation that will be required for commercial treatment contractor(s). 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

Description/Justification (cont.)

M-19-02 Obtain Ecology/EPA decision regarding acceptability of a treatment variance for 183H Basin formic acid waste. 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 stabilization 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 Complete sampling and analysis to determine if 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 of in the non-regulated I1W 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-19-04 Obtain Ecology/EPA decision on the acceptability of the existing solidification treatment of 183H Solidified Liquids as LDR treatment. December 1996

M-19-04A Submit justification for accepting existing solidification treatment of 183H Solidified Liquids to Ecology/EPA. July 1996

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

LAND DISPOSAL RESTRICTIONS ANNUAL REPORT

M-26-01

WASTE PROGRAMS DIVISION
R. F. Guercia
March 26, 1996

Milestone Description

- M-26-01 Submit an annual Hanford Site Land Disposal Restrictions (LDR) Report in accordance with the LDR Plan to cover the period from April 1 through March 31.
- Deliverables Submit the "1996" Report on Hanford Site Land Disposal Restrictions for Mixed Waste" to EPA and Ecology (M-26-01F).
- Schedule Reports submitted annually by April 30.

Accomplishments

- Report input obtained and draft report prepared.
- Contractor review of the draft report completed.

Planned Actions

- Complete RL review (in progress) and finalize the report.

Milestone Assessment - schedule and technical

- Preparation of the 1996 updated LDR status report is on schedule.

Budget

- Budget versus cost (\$ in 000's)

	FY 96					FY TOTAL
	Oct	Nov	Dec	Jan	Feb	
- FYTD Budget	9	18	28	37	46	120
- FYTD Cost	8	15	24	32	42	
- Spending Variance	1	3	4	5	4	

9613429.1410

Hanford Spent Nuclear Fuel Project

TPA Milestone Status M-34-00

*Complete Actions specified by agreed Interim Milestones
related to Remediation of the K East Basin*

Bob Holt
U.S. Department of Energy, Richland Operations Office

March 26, 1996



9613429.1441

SPENT NUCLEAR FUEL PROJECT TPA MILESTONES

March 1996

MILESTONE	COST	SCHEDULE	TECHNICAL	CUSTOMER	COMMENT
<p>M-34-00 Complete actions specified by interim milestones for remediation of K-East Basin (TBD)</p> <p>M-34-01 Dependent upon September 1994 Fuel Consolidation study, disposition KE Basin water by either (a) draining the basin starting in March 1999 completion in September 2000, or (b) drain and replace 2 million gallons per year starting in September 1996 until basin water H-3 is lowered to 300,000 pCi/l. (TBD)</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>Programmatic changes required a restructuring of M-34-00.</p> <p>See Note 1.</p>
<p>M-34-02 Submit TPA change request, commensurate with ROD on spent fuel EIS, proposing milestones for (1) removal of fuel and sludge from K Basins, (2) complete stabilization of the basins. 6/96</p> <p>M-34-00-T01 Issue Notice of Intent (NOI) for N Reactor Fuel EIS. TBD</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>Record of Decision (ROD) completed March 4, 1996. See Note 1.</p> <p>Record of Decision (ROD) completed March 4, 1996.</p>

LEGEND			
<input checked="" type="checkbox"/>	Outstanding	○	Marginal
<input type="checkbox"/>	Good	●	Unsatisfactory
<input type="checkbox"/>	Satisfactory	+	Improved from last month
		-	Worsened from last month
		↑	Improved future outlook
		↓	Worsened future outlook

2/11/96 2:27:12 PM

SPENT NUCLEAR FUEL PROJECT TPA MILESTONES

March 1996

MILESTONE	COST	SCHEDULE	TECHNICAL	CUSTOMER	COMMENT
M-34-00-T02 Initiate KE encapsulation. TBD					See Note 1.
M-34-00-T03 Submit engineering study to determine feasibility of consolidating encapsulated KE fuel at KW. 9/94 met.	☐	☐	☐	☐	Milestone met.
M-34-00-T04 Submit schedule for the disposition of KE water. 10/94	☐	☐	☐	☐	Milestone met.
M-34-00-T05 Submit schedule for fuel and sludge encapsulation, and KE water disposition. 3/95					See Note 1.
M-34-00-T06 Initiate KE sludge encapsulation. 6/96					See Note 1.
M-34-00-T07 Complete fuel and sludge encapsulation. 12/98					See Note 1.
M-34-00-T08 Remove all fuel and sludge from KE and KW. 12/2002					See Note 1.

LEGEND

- Outstanding
- Good
- Satisfactory

- Marginal
- Unsatisfactory

- + Improved from last month
- Worsened from last month
- ↑ Improved future outlook
- ↓ Worsened future outlook

9613129 1113

SPENT NUCLEAR FUEL PROJECT TPA MILESTONES

March 1996

NOTE 1: On June 13, 1995, the Unit Managers for Tri-Party Agreement Milestone M-34 met and discussed potential changes to several existing target milestones and one interim milestone. It was agreed by the three parties that interim milestone M-34-01 and the target dates for M-34-00-T02, M-34-00-T06, M-34-00-T07, and M-34-00-T08 no longer accurately reflect the path forward for the Spent Nuclear Fuels Project. As a result of this meeting, the Unit Managers agreed that the most prudent near term action in dealing with this issue was to resume discussions after the K Basins Spent Nuclear Fuel Environmental Impact Statement (EIS) Record of Decision (ROD).

The Record of Decision (ROD) for K Basins Spent Nuclear Fuel Environmental Impact Statement (EIS) was issued on March 4, 1996. Preliminary discussions have started between DOE-RL and Ecology, the lead regulatory agency, on resuming negotiations for potential new interim and target milestones that more accurately reflect the path forward as established in the EIS ROD.

LEGEND			
■	Outstanding	+	Improved from last month
□	Good	-	Worsened from last month
◇	Satisfactory	↑	Improved future outlook
		↓	Worsened future outlook
		○	Marginal
		●	Unsatisfactory

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Accomplishments

- **March 1, 1996 -- DOE-RL submitted draft of proposed M-34 negotiation strategy to DOE-HQ (EM-60) for comment per DOE HQ requirements**
- **April 4, 1996 -- DOE-RL will submit formal request to EM-60 requesting approval to resume negotiations with Ecology based on negotiation strategy**
- **May 1, 1996 -- DOE-RL will provide Ecology with TPA change package for M-34-00**

Planned Activities

- **All activities on hold**

9613429.1446

Milestone Assessment

Milestones due but not complete (next six months)

- M-34-02

Milestones in jeopardy (beyond six months)

- None

Issues

- **PCBs have been found in some areas of KE Basin as a result of sludge characterization**
- **Technical and regulatory issues associated with final disposal of sludge require resolution**

**Westinghouse Hanford Company
SITE MANAGEMENT SYSTEM**

PROGRAM

CONTRACTS & MANAGEMENT SERVICES

**J. M. KNOLL, WHC
Phone: 376-4040**

**A. W. KELLOGG, RL
Phone: 376-7489**

MARCH 1996

9613429.1449

MILESTONE SCHEDULE

WBS	Baseline Date	Fiscal Year 1996											FY 1997
		OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	
6.10.14.5 Contracts Data Management & Integration		<p>Update Publish Historical Information Access Improvement Plan M-35-05</p>											T01 Draft Completed 6/22/95 T02 Plan Published 9/29/95 Milestone Completed 9/29/95
		<p>Update TPA Databases, Access Mechanism and Procedures Document M-35-06</p>											T01 Draft Completed 11/18/95 Milestone Completed 1/25/96
		<p>Develop an Information Locator Service on HLAN M-35-07</p>											T01 Completed 6/4/95 T02 Completed 9/29/95 T03 Completed 3/xx/96 Milestone completed 3/xx/96
		<p>Complete Negotiation of Definitive Implementation Schedules for Access Enhancements M-35-08</p>											
Milestone Types:		<input type="radio"/> ^M TPA Major		<input checked="" type="radio"/> DOE-HQ		<input type="radio"/> ^{FO} DOE-FO		<input type="radio"/> ^{RL} DOE-RL		<input type="radio"/> Forecast		FOOTNOTES:	
		<input type="radio"/> ^I TPA Interim											

9613429-1450

<p style="text-align: center;">SITE MANAGEMENT SYSTEM</p>	<p style="text-align: center;">Westinghouse Hanford Company 6.10.14 Contracts Data Management & Integration</p>	<p style="text-align: center;">MARCH 1996</p>
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90-DAY LOOK AHEAD

DUE DATE	TITLE
<p>6/30/96</p>	<p><u>M-35-08 thru M-35-09C</u> - Milestones not needed. RL requesting elimination of milestones.</p>

9613429.1451

SITE MANAGEMENT SYSTEM	Westinghouse Hanford Company 6.10.14 Contracts Data Management & Integration	MARCH 1996
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TRI-PARTY AGREEMENT STATUS

M-35-00, Complete Data Management Enhancements as Negotiated and Approved:

No current activities or open action items.

PROBLEMS/ISSUES/CONCERNS

NONE

2541-6742196
9613429-1452

<p align="center">SITE MANAGEMENT SYSTEM</p>	<p align="center">Westinghouse Hanford Company 6.10.14 Contracts Data Management & Integration</p>	<p align="center">MARCH 1996</p>
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MILESTONE EXCEPTION REPORT

MILESTONES DUE BUT NOT COMPLETE

<u>Number</u>	<u>Type</u>	<u>Title</u>	<u>Scheduled Date</u>	<u>Forecast Completion Date</u>	<u>Cause/Impact/ Recovery Plan</u>
NONE					

FUTURE MILESTONES IN JEOPARDY

<u>Number</u>	<u>Type</u>	<u>Title</u>	<u>Scheduled Date</u>	<u>Forecast Completion Date</u>	<u>Cause/Impact/ Recovery Plan</u>
NONE					

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SITE MANAGEMENT SYSTEM	Westinghouse Hanford Company 1.5.2/6.9 ENVIRONMENTAL SUPPORT	MARCH 1996
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EXPENSE COST PERFORMANCE

(\$ In Thousands)

WBS (ADS)	FY TO DATE					AT COMPLETION	
	BUDGETED COST		ACTUAL COST	VARIANCE		BAC	EAC
	WORK SCHED	WORK PERF	WORK PERF	SCHED	COST		
DIRECT 1.5.2.1 (7330-00) HEMP (M-35 Milestone cost only)	<u>65.7</u>	<u>65.7</u>	<u>58.6</u>	<u>0.0</u>	<u>(7.2)</u>	<u>67.3</u>	

9613429.1454

EXPENSE SCHEDULE VARIANCE ANALYSIS

WBS	COST VARIANCE \$K	
<u>1.5.2.1</u> (7330-00)	<u>(Description and Cause:)</u> HEMP 2.3 The underrun is due to change in HLAN access charge method and Internet document delivery versus hard copy document delivery.	<u>(Impacts and Corrective Action:)</u> Impact: Minimal. Corrective Action: Variances will be evaluated monthly to determine if any action is required.

9613429.1455

Install RCRA Groundwater Wells

Milestone M-24-00

M.J. Furman

RCRA & Operational Monitoring

March 26, 1996

9613429.1456

Install RCRA Groundwater Wells Milestone M-24-00

PROGRAM MANAGER'S ASSESSMENT

WBS	PROGRAM ELEMENT	ES&H COMPLIANCE	CUSTOMER	TECHNICAL	SCHEDULE	COST	COMMENTS
1.5.3.2	RCRA Groundwater Well Installation	N/A	□	□	■	■	

<u>LEGEND</u>			
<u>RATING GRADIENT SYMBOLS</u>		<u>INDICATORS</u>	
■	Outstanding	+	Improved from last month
□	Good	--	Worsened from last month
◇	Satisfactory	↑	Improved future outlook
◐	Marginal	↓	Worsened future outlook
●	Unsatisfactory		

The information contained within this report is complete and accurate to the best of my knowledge.

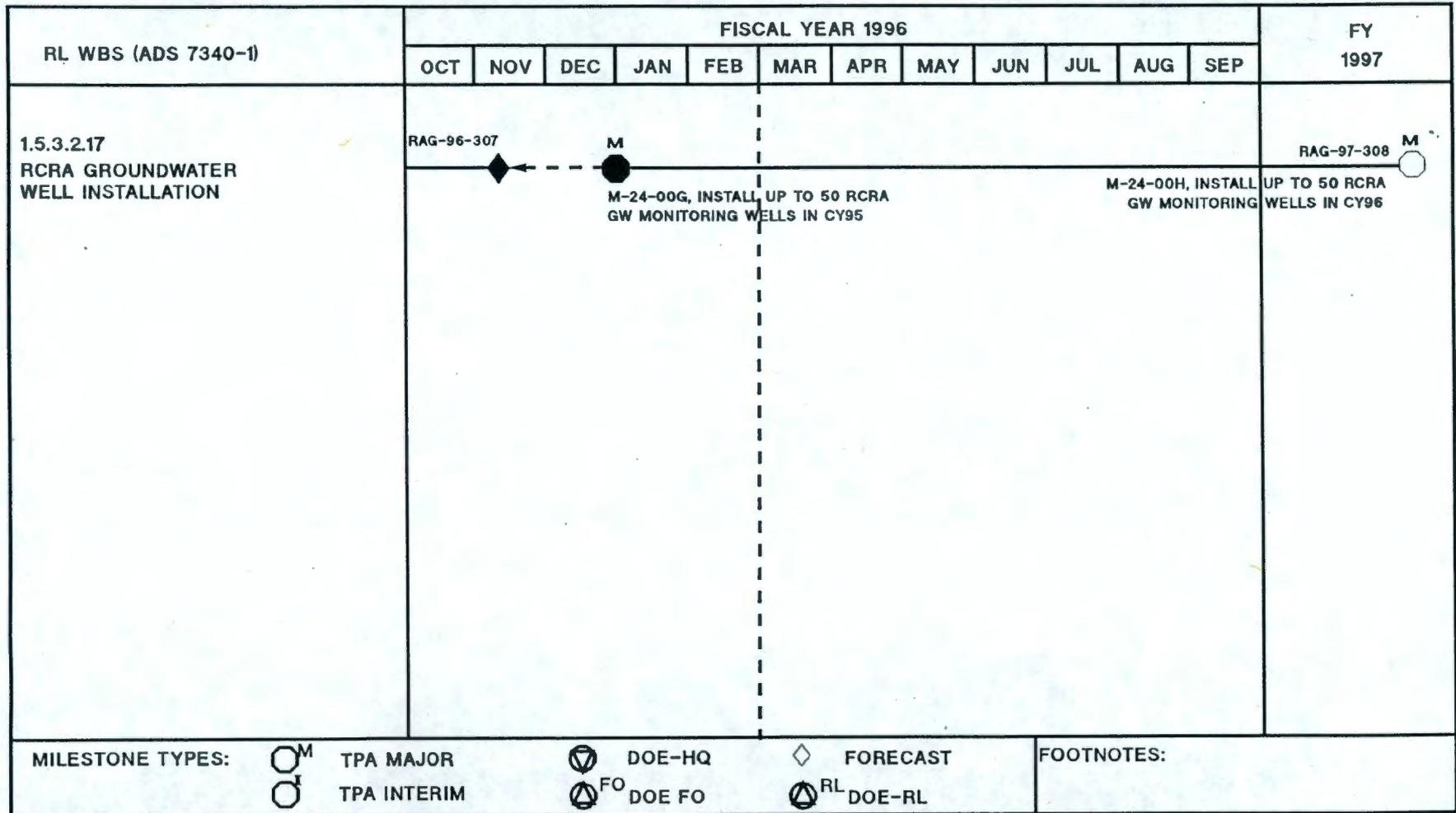


A.J. DILIBERTO
WHC PROGRAM MANAGER

9613429.1457

Install RCRA Groundwater Wells Milestone M-24-00

PROGRAM PERFORMANCE BASELINE SCHEDULE



9613429.1458

Install RCRA Groundwater Wells Milestone M-24-00

Planned Actions: (Next 6-Months)

- **Install one well in the 216-A37-1 Area for groundwater monitoring.**
- **Department of Ecology to concur with compliance of 10 TSD's or provide new groundwater well location(s) for complaint groundwater monitoring well networks**

Install RCRA Groundwater Wells Milestone M-24-00

Accomplishments:

- **Petitioned Washington State Department of Ecology for concurrence on ten Treatment, Storage and Disposal Facilities groundwater monitoring networks.**
- **Issued whitepaper on consolidation of waste site at 216-A37-1 for groundwater monitoring purposes.**
- **Proposal will reduce the number of monitoring wells from 23 to 11, for a three crib area, providing more applicable, usable and economical data**
- **Proposed drilling one well in the 216-A37-1 area.**

9613429.1460

Install RCRA Groundwater Wells Milestone M-24-00

Issues:

- **Require the Department of Ecology to accept the consolidation sites near 216-A37-1 for groundwater monitoring before the CY 1996 well can be drilled.**
- **Discontinue Quarterly Briefing on TPA Milestone M-24-00.**
 - **Reconsideration of Groundwater Monitoring Strategies**
 - **RL/WHC consider the remaining TDS's covered by M-24 to be compliant networks**
 - **Department of Ecology's Action to review network data and concur with network compliance or identify new wells for compliance**
 - **No New Well installation campaign for RCRA compliance expected**

9613429.1461

**Interim Status Dangerous Waste Tank
Systems Hanford Federal Facility
Agreement and Consent Order
Milestone M-32**

Eric M. Greager

March 26, 1996

Milestone Description

"Complete Identified Dangerous Waste Tank Corrective Actions" - September 1999

M-32 establishes TPA compliance schedules for correcting known compliance deficiencies in certain Hanford interim status dangerous waste tank systems while allowing the continued operation of those tank systems.

Deliverables and Baseline Schedules

- M-32-01 Complete PFP Actions - Dec 94**
- M-32-02 Complete 219-S Actions - Sept 97**
- M-32-03 Complete T Plant Actions - Sept 99**
- M-32-04 Complete DST Actions - June 94**
- M-32-05 Complete 242-A Evaporator Actions - one month after hot restart**
- M-32-06 Complete 244-AR Actions - prior to restart**
- M-32-07 Complete B Plant Actions - June 96**
- M-32-08 Complete Grout Actions - prior to processing waste**

Significant Accomplishments

219-S (222-S Lab)

- **Project W-178 (tank system upgrades):** B Cell liner and Tank 104 have been installed. Electrical upgrades are complete. Compressed air tubing has been tested. Pumps P-2, P-6, P-8 and P-9 have been set in place.

Project W-087 (line replacement): Phase I piping (from 219-S to 244-S) is complete. Phase II piping (from 222-S to 219-S) is installed.

T Plant

- **Project W-259 (tank system upgrades):** Initiated definitive design 2 weeks ahead of schedule. Briefed Ecology on rescoping of project.

Significant Accomplishments (cont'd)

DST

- DST integrity assessment selection criteria document issued. UT will be performed on certain tanks meeting the selection criteria.

B Plant

- M-32-07-T06 - Provided a plan and schedule for transferring the aqueous waste, generated during operations to separate radionuclides from the organic solvent waste, to Tank Farms.

Significant Accomplishments (cont'd)

340/RLWS Complex

- Completed 340 Facility integrity assessment physical testing (results were favorable). Completed draft integrity assessment report.

Negotiations on proposed interim milestone ongoing.

9613429.1467

Significant Planned Activities (next six months)

219-S (222-S Lab)

- **Project W-178 (tank system upgrades):** Install pump P-7, sump leak detectors and wiring/conduits between transmitters and instrumentation panels. Reroute drain lines to Tank 104 and remove steam siphon jets and associated piping. Finish remaining Phase I work.

Project W-087 (line replacement): Complete punchlist items on Phase I and perform acceptance testing. Perform acceptance testing on Phase II transfer line. Initiate piping installation in the 222-S service tunnels.

Significant Planned Activities (cont'd)

T Plant

- **Project W-259 (tank system upgrades): Complete definitive design.**

Double-Shell Tanks

- **Complete study of DST UT examination alternatives.**
- **Complete evaluation of DST design standards.**
- **Re-plan assessment activities to accommodate budget cuts.**
- **Continue to conduct meetings with Ecology to establish a new DST interim milestone in M-32.**

Significant Planned Activities (cont'd)

B Plant

- Remove radionuclides from organic solvent waste to support disposition.

340/RLWS Complex

- Identify a date by which time the 340 Facility will cease accepting waste shipments.

9613429.1470

Milestone Assessment

- **Milestones Due But Not Complete (next six months)**

M-32-07 - Complete B Plant Interim Status Tank Actions by June 1996.

- **Milestones in Jeopardy (beyond six months)**

M-32-02 - Complete 219-S Tank Interim Status Actions by September 1997.

9613429.1471

Issues

B Plant Issue:

M-32-07-T05 (interim milestone): Efforts to decontaminate organic to acceptance levels for disposition of the waste to an offsite disposal facility or compliant interim storage may not be achievable by June 1996 because of technical issues. Present planning will move the organic to an interim storage tank outside of B Plant. The NOI for this storage tank is undergoing public comment.

9613429.1472

Issues

219-S Issue:

M-32-02/Project W-178 Increase in the Total Estimated Cost (TEC) has jeopardized ability to support completion of construction by interim milestone September 1997 due date. The increase in the TEC is a result of higher radiation dose rates than anticipated, decreases in personnel dose rates allowed (Rad Con manual changes), increases in cell decontamination criteria (Rad Con manual changes), and additional cell cleanup costs.

Interim Status Dangerous Waste Tank Systems Milestone M-32-00 Project Manager's Assessment

Interim Milestone	Description	ES & H Compliance	Customer	Technical	Schedule	Cost
M-32-01	Complete PFP Actions	<input type="checkbox"/>				
M-32-02	Complete 219-S Action	↓	<input type="checkbox"/>	<input type="checkbox"/>	↓	↓
M-32-03	Complete T Plant Actions	<input type="checkbox"/>				
M-32-04	Complete DST Actions	<input type="checkbox"/>				
M-32-05	Complete B Plant Actions	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	↓	<input type="checkbox"/>

9613429.1474

Legend:
 Good Performance
 ↓ Worsened Future Outlook


 D. E. Jackson
 RL Project Manager

3-22-96
 Date

	Federal Facility Agreement and Consent Order Change Control Form	Date
Originator Paul J. Krupin		Phone (509) 372-1112
Class of Change <input checked="" type="checkbox"/> I - Signatories <input type="checkbox"/> II - Project Manager <input type="checkbox"/> III - Unit Manager		
Change Title Interim Status Dangerous Waste Tank Systems Hanford Federal Facility Agreement and Consent Order Milestone, M-32.		
Description/Justification of Change Add milestone. The proposed milestone establishes Tri-Party Agreement compliance schedules for the Hanford interim status dangerous waste tank systems.		
Impact of Change This change establishes a new major milestone with interim milestones. Completion of interim milestone tasks may identify the need for additional actions or interim milestones in the future. This milestone does not impact any other Tri-Party Agreement interim or major milestone.		
Affected Documents Affected Documents: Hanford Federal Facility Agreement Consent Order Action Plan, Appendix D, Figure D-1 Work Schedule, and Table D-3.		
Approvals <input type="checkbox"/> Approved <input type="checkbox"/> Disapproved		
_____ DOE	_____ Date	
_____ EPA	_____ Date	
_____ Ecology	_____ Date	

Proposed Interim Status Dangerous Waste Tank Systems Hanford Federal
Facility Agreement and Consent Order Milestone
M-32

M-32-00

**Complete Identified Dangerous Waste Tank
Corrective Actions.**

Sept. 99

Completion of interim milestone tasks may identify the need for additional actions or interim milestones in the future. The reports and deficiency correction schedules prepared to satisfy current milestones will be used to identify any appropriate new interim milestones. Any new interim milestones will subsequently be established via the change process in Section 12 of the Action Plan.

Tank integrity assessments will not be required for terminal cleanout of the Plutonium-Uranium Extraction Plant, except for Tanks F18, U3, and U4. Integrity assessments for Tanks F18, U3, and U4 have been completed.

M-32-01

**Complete Plutonium Finishing Plant (PFP) Tank
Interim Status Actions.**

Dec. 94

Stabilization activities at the Plutonium Finishing Plant (PFP), dependent on evaluation of alternatives under the National Environmental Policy Act, will be limited to a liquid waste generation of 300,000 gallons or less to the 241-Z tank system. The waste is temporarily stored in the 241-Z Tank System prior to transfer to the Double-Shell Tank Farms. Following any such stabilization activity, the PFP will not initiate any additional mission(s), except as described below, that results in the discharge of waste to the 241-Z tanks prior to completion of tank system upgrades necessary for compliance with state and federal dangerous waste regulations.

Glove-box scale, laboratory, plant maintenance, and miscellaneous support activities necessary for safe, secure storage of materials and protection of personnel and the environment will continue. With exception of the stabilization activities, discharge to 241-Z will be limited to 50,000 gallons per year until compliance is achieved or terminal cleanout is completed. Any terminal cleanout discharge requirements in excess of 50,000 gallons per year will be reviewed and approved by the three parties prior to implementation.

M-32-01-T01	Complete and submit integrity assessment report for PFP interim status tank system. Provide a schedule to address any deficiencies described in the report related to tank system compliance (Deficiencies not addressed in this schedule will be addressed in the compliance strategy of target action M-32-01-T02).	Oct. 93
M-32-01-T02	Submit proposed compliance strategy for remaining dangerous waste tank system issues.	June 94
M-32-01-T03	Complete construction of piping upgrades between 234-5Z, 236-Z and 241-Z Tank System (Project C-031H).	Dec. 94
M-32-02	Complete 219-S Tank Interim Status Actions.	Sept. 97
M-32-02-T01	Provide notification of completion of Definitive Design for Project W-178 - Construction of Interim Status Tank System Upgrades for 219-S Tank System.	Jan. 96
M-32-02-T02	Upgrade existing transfer lines to meet secondary containment requirements.	Sept. 97
M-32-03	Complete T Plant Tank Actions.	Sept. 99
M-32-03-T01	Implement periodic visual inspection and static leak test program for 2706-T and 211-T tanks.	Oct. 93
M-32-03-T02	Complete Conceptual Design Report (Project W-259) for T Plant tank system upgrades.	Apr. 94
M-32-03-T03	Submit schedule for completion of T Plant tank system upgrades (Project W-259).	June 94
M-32-03-T04	Complete modification of 2706-T Staging Pad to eliminate accumulation of precipitation.	June 94
M-32-03-T05	Install level indication device for 211-T tank.	June 94
M-32-03-T06	Complete scheduled upgrades to T Plant tank system (Project W-259).	Sept. 99
M-32-04	Complete Double-Shell Tank Interim Status Tank Actions.	June 94
M-32-04-T01	Submit design standards review for one tank farm.	Sept. 93
M-32-04-T02	Prepare and submit report documenting non-destructive examination equipment development and implementation plans.	Sept. 93
M-32-04-T03	Complete all DST visual examination and prepare and submit reports.	Sept. 93
M-32-04-T04	Complete and submit the Transfer Facility Compliance Plan.	June 94
M-32-04-T05	Submit to Ecology a final plan and schedule for completion of the Double-Shell Tank integrity assessments.	June 94
M-32-05	Complete 242-A Evaporator Interim Status Tank Actions.	1 Month after hot restart

M-32-05-T01	Complete and submit integrity assessment report for the 242-A Evaporator interim status tank system. Provide a schedule to address any deficiencies described in the report related to tank system compliance.	1 Month after hot restart
M-32-06	Complete 244-AR Vault Interim Status Tank Actions.	Prior to restart
M-32-06-T01	Complete and submit integrity assessment report and identified upgrades for 244-AR Vault interim status tank system (except that DST transfer lines that penetrate the 244-AR Vault will continue to be used). Provide a schedule to address any deficiencies described in the report related to tank system compliance.	Prior to restart
M-32-07	Complete B Plant Interim Status Tank Actions.	Dec. 95
M-32-07-T01	Identify additional dangerous waste tanks and ancillary equipment that will be routinely used during cleanout and stabilization activities. Submit schedule to perform integrity assessments on identified additional dangerous waste tanks and ancillary equipment. B Plant will not accept any waste for treatment, except waste generated as a result of on-going B Plant/WESF operations, without completion of tank integrity assessments and completion of upgrades necessary for compliance with WAC 173-303-640 or an applicable permit on systems used for the treatment, storage or disposal of the waste.	Apr. 94
M-32-07-T02	Complete and submit integrity assessment plan for Tanks 25-1, 25-2, 23-1, concentrator E-23-3, and identified ancillary equipment.	Oct. 94
M-32-07-T03	Complete and submit integrity assessment report for Tanks 25-1, 25-2, 23-1, concentrator E-23-3, and ancillary equipment as identified in the integrity assessment plan. Provide a schedule to address any deficiencies described in the report related to tank system compliance. The integrity assessment report of the low level waste concentrator, E-23-3, and the concentrated waste receiver, TK-23-1, will be completed only if their operation is planned beyond December 1995. The determination to include these two tanks in the integrity assessment report will be made by October 1994.	Dec. 95

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M-32-08

Complete Grout Interim Status Tank Actions.

Prior to
processing
DST waste

M-32-08-T01

Complete and submit integrity assessment report for Grout interim status tank system. Complete activities required to correct any deficiencies described in the report related to tank system compliance.

Prior to
processing
DST waste

Interim Status Dangerous Waste Tank Systems Hanford Federal
Facility Agreement and Consent Order Milestone
M-32

M-32-00

**Complete Identified Dangerous Waste Tank
Corrective Actions.**

Sept. 99

Completion of interim milestone tasks may identify the need for additional actions or interim milestones in the future. The reports and deficiency correction schedules prepared to satisfy current milestones will be used to identify any appropriate new interim milestones. Any new interim milestones will subsequently be established via the change process in Section 12 of the Action Plan.

Tank integrity assessments will not be required for terminal cleanout of the Plutonium-Uranium Extraction Plant, except for Tanks F18, U3, and U4. Integrity assessments for Tanks F18, U3, and U4 have been completed.

M-32-01

**Complete Plutonium Finishing Plant (PFP) Tank
Interim Status Actions.**

Dec. 94

Stabilization activities at the Plutonium Finishing Plant (PFP), dependent on evaluation of alternatives under the National Environmental Policy Act, will be limited to a liquid waste generation of 300,000 gallons or less to the 241-Z tank system. The waste is temporarily stored in the 241-Z Tank System prior to transfer to the Double-Shell Tank Farms. Following any such stabilization activity, the PFP will not initiate any additional mission(s), except as described below, that results in the discharge of waste to the 241-Z tanks prior to completion of tank system upgrades necessary for compliance with state and federal dangerous waste regulations.

Glove-box scale, laboratory, plant maintenance, and miscellaneous support activities necessary for safe, secure storage of materials and protection of personnel and the environment will continue. With exception of the stabilization activities, discharge to 241-Z will be limited to 50,000 gallons per year until compliance is achieved or terminal cleanout is completed. Any terminal cleanout discharge requirements in excess of 50,000 gallons per year will be reviewed and approved by the three parties prior to implementation.

M-32-01-T01	Complete and submit integrity assessment report for PFP interim status tank system. Provide a schedule to address any deficiencies described in the report related to tank system compliance (Deficiencies not addressed in this schedule will be addressed in the compliance strategy of target action M-32-01-T02).	Oct. 93
M-32-01-T02	Submit proposed compliance strategy for remaining dangerous waste tank system issues.	June 94
M-32-01-T03	Complete construction of piping upgrades between 234-5Z, 236-Z and 241-Z Tank System (Project C-031H).	Dec. 94
M-32-02	Complete 219-S Tank Interim Status Actions.	Sept. 97
M-32-02-T01	Provide notification of completion of Definitive Design for Project W-178 - Construction of Interim Status Tank System Upgrades for 219-S Tank System.	Jan. 96
M-32-02-T02	Upgrade existing transfer lines to meet secondary containment requirements.	Sept. 97
M-32-03	Complete T Plant Tank Actions.	Sept. 99
M-32-03-T01	Implement periodic visual inspection and static leak test program for 2706-T and 211-T tanks.	Oct. 93
M-32-03-T02	Complete Conceptual Design Report (Project W-259) for T Plant tank system upgrades.	Apr. 94
M-32-03-T03	Submit schedule for completion of T Plant tank system upgrades (Project W-259).	June 94
M-32-03-T04	Complete modification of 2706-T Staging Pad to eliminate accumulation of precipitation.	June 94
M-32-03-T05	Install level indication device for 211-T tank.	June 94
M-32-03-T06	Complete scheduled upgrades to T Plant tank system (Project W-259).	Sept. 99
M-32-04	Complete Double-Shell Tank Interim Status Tank Actions.	June 94
M-32-04-T01	Submit design standards review for one tank farm.	Sept. 93
M-32-04-T02	Prepare and submit report documenting non-destructive examination equipment development and implementation plans.	Sept. 93
M-32-04-T03	Complete all DST visual examination and prepare and submit reports.	Sept. 93
M-32-04-T04	Complete and submit the Transfer Facility Compliance Plan.	June 94
M-32-04-T05	Submit to Ecology a final plan and schedule for completion of the Double-Shell Tank integrity assessments.	June 94

M-32-05	Complete 242-A Evaporator Interim Status Tank Actions.	1 Month after hot restart
M-32-05-T01	Complete and submit integrity assessment report for the 242-A Evaporator interim status tank system. Provide a schedule to address any deficiencies described in the report related to tank system compliance.	1 Month after hot restart
M-32-06	Complete 244-AR Vault Interim Status Tank Actions.	Prior to restart
M-32-06-T01	Complete and submit integrity assessment report and identified upgrades for 244-AR Vault interim status tank system (except that DST transfer lines that penetrate the 244-AR Vault will continue to be used). Provide a schedule to address any deficiencies described in the report related to tank system compliance.	Prior to restart
M-32-07	Complete B Plant Interim Status Tank Actions.	June 96
M-32-07-T01	Identify additional dangerous waste tanks and ancillary equipment that will be routinely used during cleanout and stabilization activities. Submit schedule to perform integrity assessments on identified additional dangerous waste tanks and ancillary equipment. B Plant will not accept any waste for treatment, except waste generated as a result of on-going B Plant/WESF operations, without completion of tank integrity assessments and completion of upgrades necessary for compliance with WAC 173-303-640 or an applicable permit on systems used for the treatment, storage or disposal of the waste.	Apr. 94
M-32-07-T02	Complete and submit integrity assessment plan for Tanks 25-1, 25-2, 23-1, concentrator E-23-3, and identified ancillary equipment.	Oct. 94
M-32-07-T03	Complete and submit integrity assessment report for Tanks 25-1, 25-2, 23-1, concentrator E-23-3, and ancillary equipment as identified in the integrity assessment plan. Provide a schedule to address any deficiencies described in the report related to tank system compliance. The integrity assessment report of the low level waste concentrator, E-23-3, and the concentrated waste receiver, TK-23-1, will be completed only if their operation is planned beyond December 1995. The determination to include these two tanks in the integrity assessment report will be made by October 1994.	Dec. 95

- | | | |
|-------------|---|-------------------------------|
| M-32-07-T04 | Consolidate organic solvent waste into two tanks and perform external visual inspection and structural integrity test of these tanks and associated tank supports. | Dec. 95 |
| | Continue daily monitoring of overflow/leak detection devices (e.g., tank level detection, high level alarms) until organic solvent waste is removed from the B Plant canyon. No additional visual inspections, integrity tests, or secondary containment upgrades will be performed unless required by the new interim milestone proposed by target action M-32-07-T05. | |
| M-32-07-T05 | Perform operations to separate radionuclides from the organic solvent waste to support disposition of the waste to an offsite disposal facility, or compliant interim storage. | June 96 |
| M-32-07-T06 | Provide a plan and schedule for transferring the aqueous waste, generated during operations to separate radionuclides from the organic solvent waste, from the B Plant canyon to the Tank Farms double shell tanks. | Feb. 96 |
| | After completion of target action M-32-07-T06, continue daily monitoring of overflow/leak detection devices (e.g., tank level detection, high level alarms) until aqueous waste is removed from B Plant and transferred to the Tank Farms double shell tanks for long term storage. No additional visual inspections, integrity tests, integrity assessments, or secondary containment upgrades will be performed in FY 1996. | |
| M-32-08 | Complete Grout Interim Status Tank Actions. | Prior to processing DST waste |
| M-32-08-T01 | Complete and submit integrity assessment report for Grout interim status tank system. Complete activities required to correct any deficiencies described in the report related to tank system compliance. | Prior to processing DST waste |

Submit Part B Permit Applications or Closure Plans
for all RCRA TSD Units
Milestone M-20-00

PROGRAM MANAGER'S ASSESSMENT

WBS	PROJECT ELEMENT	ES & H COMPLIANCE	CUSTOMER	TECHNICAL	SCHEDULE	COST	COMMENTS
1.5.2	Hanford Environmental Management Program	■	■	■	■	■	
1.4.10	Environmental Restoration	□	□	■	□	□	All milestones are on schedule.

LEGEND

RATING GRADIENT SYMBOLS

- | | | | |
|---|----------------|----|--------------------------|
| ■ | Outstanding | + | Improved from last month |
| □ | Good | -- | Worsened from last month |
| ◇ | Satisfactory | ↑ | Improved future outlook |
| ● | Marginal | ↓ | Worsened future outlook |
| ○ | Unsatisfactory | | |

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PERMITS AND CLOSURE PLANS

Milestone M-20-00

E. M. Mattlin

Environmental Assurance, Permits
and Policy Division
U.S. Department of Energy
Richland Operations Office

March 26, 1996

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MILESTONE DESCRIPTION

M-20-00

Submit Part B Permit Applications or closure plans for all RCRA TSD Units (2-00)

Deliverable(s)

Complete individual TSD unit submittals in accordance with Appendix D Work Schedules

ACCOMPLISHMENTS (last three months)

Closure Plans

- Submitted a revised Hanford Facility Dangerous Waste Part A Permit Application, Form 3, with "CLOSED" stamped on the front page for the 304 Concretion Facility

Hanford Facility RCRA Permit

- Two RCRA Permit Steering Committee meetings were held
- Quarterly Class 1 Modification package submitted to Ecology in accordance with Permit Condition I.C.3. on 01/02/96

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ACCOMPLISHMENTS (last three months)

Hanford Facility RCRA Permit (cont'd)

- Annual Noncompliance report submitted to Ecology in accordance with Permit Condition I.E.19. on 02/28/96
- Annual Dangerous Waste report submitted to Ecology in accordance with Permit Condition I.E.22. on 03/01/96
- Schedule for Class 3 Modification B (1996) was tentatively scheduled by Ecology, Public Comment beginning mid-July and Permit Rev. effective mid-October
- Delivered Permit Handbook on 03/14/96 to Steering Committee members for action

ACCOMPLISHMENTS (last three months)

Hanford Facility RCRA Permit (cont'd)

Part A

- Submitted the following Hanford Facility Dangerous Waste Part A Permit Application Form 3 revisions:
 - 224-T Transuranic Waste Storage and Assay Facility, Rev. 5, submitted 02/09/96
 - 300 Area Waste Acid Treatment System, Rev. 4, submitted 03/13/96
 - T Plant Complex, Rev. 6, submitted 12/21/95
 - Liquid Effluent Retention Facility, Rev. 4, submitted 03/13/96

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ACCOMPLISHMENTS (last three months)

Part A (cont'd)

- Notices of Intent for Expansion Under Interim Status were filed for the following units:
 - None

Part B

- Submitted the following Hanford Facility Dangerous Waste Part B Permit Applications:
 - None

PLANNED ACTIONS (next six months)

Unit-Specific Closure Plans

- Continue decommissioning and decontamination activities at the following unit:
 - 105-DR Sodium Fire Facility
- Complete closure for 183-H Solar Evaporation Basins
- Submit closure certification for the following units:
 - 105-DR Sodium Fire Facility
 - 183-H Solar Evaporation Basins
 - 4843 Alkali Metal Storage Facility
 - 3718-F Alkali Metal Storage and Treatment Facility

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PLANNED ACTIONS (next six months)

Unit-Specific Closure Plans (cont'd)

- Submit revised Hanford Facility Dangerous Waste Part A Permit Application, Form 3s, with "Closed" stamped on front page for the following units:
 - 4843 Alkali Metal Storage Facility
 - 3718-F Alkali Metal Storage and Treatment Facility

PLANNED ACTIONS (next six months)

Part A

- Form 3 Revisions
 - 200 Area Effluent Treatment Facility, Rev. 2
 - B Plant Complex, Rev. 4
 - PUREX Plant, Rev. 7
 - Low-Level Burial Grounds, Rev. 8

- Pursue procedural closure for the following units:
 - Biological Treatment Test Facilities
 - 221-T Containment Systems Test Facility
 - 1706-KE Waste Treatment System

PLANNED ACTIONS (next six months)

Part A (cont'd)

- 2727-WA SRE Sodium Storage Buildings
- 437 Maintenance and Storage Facility

- Notices of Intent (NOI) for Expansion Under Interim Status
 - Low-Level Burial Grounds - Addendum to Recent NOI Addressing Operational Flexibility of Trenches 31 and 34 and Leachate Treatment
 - SUBMIT NOI for ^{BLDG.} 1025 HAZARDOUS WASTE

Part B

- Continue NOD workshops with Ecology for the following units:
 - Double-Shell Tank System (NOD Response Tables submitted 7/13/93 and 3/25/94)

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PLANNED ACTIONS (next six months)

Part B (cont'd)

- 200 Area Liquid Waste Complex (LERF, ETF, 242-A) (NOD Response Tables, submitted 06/24/93, 09/26/94, and 10/26/94)
- Low-Level Burial Grounds (NOD Response Table, submitted 04/09/95)
- Central Waste Complex (NOD Response Table, submitted 09/27/95)
- Waste Receiving and Processing Facility (NOD Response Table, submitted 02/17/95)

TSCA Application

- Low-Level Burial Grounds - Authority to Dispose of PCB Waste in Mixed Waste Trenches 31 and 34

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PLANNED ACTIONS (next six months)

Hanford Facility RCRA Permit

- Submit Quarterly Class 1 Modification packages to Ecology in accordance with Permit Condition I.C.3. by 04/10/96 and 07/10/96
- Finalize Rev. 2 of the Hanford Facility Dangerous Waste Permit Application, General Information Portion with Ecology for inclusion into Modification B
- Conduct and complete sitewide inspections by 09/26/96
- Support administration of Class 3 Modification (Mod B)
- Submit marking and mapping methods and procedures description report (Permit Condition II.U.1.) by 09/26/96

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