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Meeting Minutes Transmittal/Approval
Tri-Party Agreement Milestone Review Meeting
EPA Conference Room
Richland, Washington
December 13, 1993

From/ Appvl.: *SHW* Date: 1/19/94
Steven H. Wisness, RL (A5-19)
Hanford Project Manager

Appvl.: *Douglas R. Sherwood* Date: 1/19/94
Douglas R. Sherwood, EPA (B5-01)
Hanford Project Manager

Appvl.: *Roger Stanley* Date: 1/19/94
Roger Stanley, Ecology
Director, Tri-Party Agreement Implementation

Prepared by Appvl.: *Frank T. Calapristi* Date: 1/19/94
Frank T. Calapristi
Westinghouse Hanford Company

DISTRIBUTION

Austin, BA	WHC	B2-35	Price, SM	WHC	H6-23
Black, DG	WHC	H6-20	Sherwood, DR	EPA	B5-01
Calapristi, FT	WHC	B2-35	Stanley, R	ECO	Olympia
Carter, RP	DOE	R3-80	Thompson, RR	WHC	H6-32
Claussen, DW	DOE	R3-80	Tilden, HT	PNL	P7-79
Furman, MJ	DOE	R3-80	Wisness, SH	RL	A5-15
Gordon, RM	DOE	R3-80	Waite, JL	WHC	B2-35
Joyce, SM	WHC	H4-19	Walker, PJ	MACTEC	A7-27
Lucas, DR	WHC	G6-46	Wanek, DM	DOE	R3-80
Nylander, D	ECO	Kennewick	Yerxa, JK	RL	A5-15
Pabst, DB	WHC	B2-35	EPIC	WHC	H6-08



9413137.1095

Tri-Party Agreement Milestone Review
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1. M-11-00 Lab Hot Cell Expansion

The presentation was made by Paul Carter (Attachment 1) supplemented by photographs of the hot cell construction.

At the completion of the presentation, Steve Wisness invited EPA and Ecology to visit the hot cell construction site. The regulators accepted the invitation; WHC will arrange the field visit.

There were no action items or issues identified.

2. M-14-00 Low Level Lab

The presentation was made by Paul Carter (Attachment 2).

Under the "Issues" discussion, DOE reviewed two subjects:

- Ecotek protest of the commercial laboratory contracts.
- Start up of the Waste Sampling and Characterization Facility (WSCF) at a reduced level (Attachment 2A).

DOE requested regulator approval of the DOE plan to start the WSCF on April 30, 1994 but at a reduced staff level. The proposed reduction was caused by two events: reduced workload resulting from the delay of Project C-018 to June 1995 from the original October 1994 date and the reduced sample projection for the ER program.

Doug Sherwood (EPA) stated that a separate meeting is necessary to review this proposal; since other activities or requirements need to be considered. Doug suggested scheduling the meeting after the release of the GAO report on the protests; which is due January 20, 1994. It was also decided the meeting should define the programs WESF will be required to support beginning April 30, 1994.

As a follow up action, the Project Managers also agreed to review this topic at the January 19, 1994, Project Managers Meeting.

3. M-24-00 Groundwater Wells

The presentation was made by Marvin Furman (Attachment 3).

Under the "Special Topics" discussion, DOE projected a probable delay in drilling the last well by December 31, 1993, which is the result of a broken casing. (Milestone 24-00E)

A supplement to the "Special Topics" (Attachment 3A) was then distributed, indicating good progress in correcting the problem with the broken casing. DOE stated with good weather and no other unforeseen problems, timely completion of the milestone is possible.

9413137-1096

**Tri-Party Agreement Milestone Review
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The use of "Force Majeure" to support a schedule change, was discussed by EPA and DOE. EPA stated the change request should reflect the exact number of days in the delay, rather than an estimated delay under "Force Majeure." After additional discussion, DOE said the submittal of the change request will be delayed until December 17, 1993, in order to have a better estimate of the delay period.

4. M-18-00 WRAP I

The information was presented by Roger Gordon (Attachment 4).

Under the "Milestone Assessment" discussion, DOE reported a potential delay in construction because the "Notice of Construction" is still waiting approval.

There were no other issues or action items identified.

5. M-19-00 WRAP II

The information was presented by Dennis Claussen (Attachment 5).

Under "Accomplishments", Privatization of Mixed Waste Treatment was discussed and DOE noted there was a recent briefing presented to Ecology and EPA. Both EPA and Ecology requested copies of the presentation and handouts.

Action: Provide copy of "Privatization Briefing" to
D. Nylander (Ecology) and D. Sherwood (EPA)

Resp.: Dennis Claussen
Due: December 30, 1993

Action: Provide D. Sherwood and D. Nylander a copy of the
"Process Confirmation Report"

Resp.: Dennis Claussen
Due: January 19, 1994

6. M-26-01 LDR Plan

After completion of the presentation made by Dennis Claussen (Attachment 6), EPA reported on an issue discussed at a recent Senior Management Regulatory meeting. There was a concern about the number of reports being produced which contain similar information. In the subsequent discussion, EPA suggested the need for a long term approach towards consolidation.

DOE replied consolidation is being considered but this can cause problems with other national reporting requirements. However, DOE is continuing to look into opportunities for reducing the number of reports.

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**Tri-Party Agreement Milestone Review
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December 13, 1993 (sheet 4 of 3)**

7. M-20-00 Part B and Closure Plans

The presentation was made by Sue Price, WHC (Attachment 7)

Under "Planned Actions", the schedule for closure plans, NOD's, etc. was discussed. It was recognized that there is a need to develop a formal schedule between DOE and Ecology, to include priorities. Meetings between DOE and Ecology are ongoing to work this problem.

There were no issues or action items identified.

9413137-1098

AGENDA

TRI-PARTY AGREEMENT MAJOR MILESTONE MANAGEMENT REVIEW

MONDAY, DECEMBER 13, 1993

EPA CONFERENCE ROOM
MEDICAL DENTAL CENTER

<u>TIME</u>	<u>MILESTONE</u>	<u>TITLE</u>	<u>RL DIVISION DIRECTOR</u>	<u>LEVEL 2/3 MGR.</u>	<u>PRESENTER</u>
9:00 am	M-11-00	Lab Hot Cell Expansion	J. M. Hennig	J. R. Kelly	R. P. Carter
	M-14-00	Low Level Lab	J. M. Hennig	C. R. Stroup	R. P. Carter
9:45 am	M-24-00	Groundwater Wells	J. M. Hennig	R. R. Thompson	M. J. Furman
10:00 am		BREAK			
10:15 am	M-18-00	WRAP I	J. M. Hennig	R. J. Roberts	R. M. Gordon
	M-19-00	WRAP II	J. M. Hennig	R. J. Roberts	D. W. Claussen
	M-26-01	LDR Plan	J. M. Hennig	G. W. Jackson	D. W. Claussen
10:45 am	M-20-00	Part B and Closure Plans	J. D. Bauer	S. M. Price	C. E. Clark
11:30 am		ADJOURN			

ATTENDEES

TPA MILESTONE MANAGEMENT REVIEW

DECEMBER 13, 1993

EPA CONFERENCE ROOM
MEDICAL DENTAL CENTER

<u>NAME</u>	<u>ORGANIZATION</u>	<u>MAILSTOP</u>
<u>F.T. CALAPRISTI</u>	<u>WHC / TPA</u>	<u>B2-35</u>
<u>D. Waeker</u>	<u>MACTEC</u>	<u>A7-27</u>
<u>Don Waneck</u>	<u>DOE</u>	<u>R3-80</u>
<u>PP Carter</u>	<u>DOE</u>	<u>R3-80</u>
<u>Steve Joyce</u>	<u>WHC / HASM</u>	<u>H4-19</u>
<u>Steve Wisneski</u>	<u>DOE</u>	<u>A5-15</u>
<u>Doug Sherwood</u>	<u>EPA</u>	<u>B5-01</u>
<u>JACK WATZ</u>	<u>WHC / TPA</u>	<u>B2-35</u>
<u>Becky Austin</u>	<u>WHC / TPA</u>	<u>B2-35</u>
<u>Dave Nylander</u>	<u>Ecology (Kennewick)</u>	<u>Kennewick</u>
<u>P. Ray Thompson</u>	<u>WHC / ROM</u>	<u>H6-32</u>
<u>M. Furman</u>	<u>DOE / WMD</u>	<u>R3-80</u>
<u>R. Gordon</u>	<u>DOE / WMD</u>	<u>R3-80</u>
<u>D.R. Lucas</u>	<u>WMC</u>	<u>G6-46</u>

9413137.1100

**Complete Construction and Initiate Operations
of Expanded Laboratory Hot Cells for
High-Level Radioactive Mixed Waste**

MILESTONE M-11-00

Paul Carter

December 13, 1993

MILESTONE DESCRIPTION

- **M-11-00** **Complete construction and initiate operations of expanded laboratory hot cells for high-level radioactive mixed waste.**

- **DELIVERABLE(S)** **Complete Conceptual Design for hot cell expansion - June 1989**

 Complete Definitive Design for hot cell expansion - March 1992

 Expanded laboratory hot cells that will provide double the sample throughput capacity of the current 222-S Laboratory - June 1994

- **BASELINE SCHEDULE** **Complete construction and initiate operations - June 1994**

ACCOMPLISHMENTS (Last three months)

- **Completed building ceiling, hot cell painting, and floor tile installation**
- **Contractor substantially completed his contract on November 15, 1993, one week ahead of contractual date.**
- **Contractor working off punchlist items.**
- **Started installation of manipulators and shielding windows.**

PLANNED ACTIONS (Next six months)

- **Complete all contractor punchlist items.**
- **Sign "Official Acceptance of Construction" and turn facility over Operations.**
- **Complete installation of windows and manipulators.**
- **Complete Readiness Review activities.**

MILESTONE ASSESSMENT

Schedule

- **Construction Schedule**
 - **Began construction July 1992**
- **Complete construction for Hot Cells Expansion March 1994 (Target Milestone M-11-00-T1) - On schedule**
- **Complete construction and initiate Operations June 1994 (Major Milestone M-11-00) - On schedule**

Technical Scope

- **No changes in scope**

MILESTONE ASSESSMENT (cont'd)

Budget vs. Cost (\$ in Thousands)

Fiscal Year to Date	Oct	Nov	Dec	Jan	Feb	Mar	3rd Qtr.	4th Qtr.
Budget	273	508	756					
Cost	-341	452						
Spending Variance	-68	56						

Variance Explanation: Accounting correction in October for procurement accrual costs. Remainder of variance is due to slipped schedule on W-001.

SPECIAL TOPICS

- **Project W-001 has experienced some construction delays, causing the construction complete date to slip to March 30, 1994. There will be no impact to the M-11-00 milestone.**

Provide Low-Level Mixed Waste Laboratory Services

Milestone M-14-00

Paul Carter

December 9, 1993

Milestone Description

- **M-14-00** **DOE shall comply with Senior Executive Committee Agreement on Resolution of Milestone M-14-00 Dispute (1/8/93)**

- **M-14-01** **WSCF Definitive Design (Complete) 11/90**

- **M-14-02** **Complete Construction of 27 Module WSCF (Complete) 10/93**

- **M-14-03** **Initiate Operations of 27 Module WSCF - 4/94**

Milestone Description (Continued)

- **M-14-04**
Best Efforts to Award Commercial Contract - 7/93 - Complete
Commence Local Operations of Commercial Laboratory - 10/95

- **Deliverables (s)** **WSCF and Commercial Laboratories accepted by operations contractor and RL for facility start-up.**
- **Baseline Schedule** **WSCF Startup - 4/94**
Commence Commercial Laboratory Startup - 10/95

Significant Events (Last three months)

M-14-02

- **WSCF construction**
 - **Completed construction. The Official Acceptance of Completion (OAC) Parts I and II were approved by DOE on 10/31/93. Punch list items being completed.**

M-14-03

- **Startup Activities:**
 - **Continued ramp-up of the operating staff.**

M-14-04

- **Commercial Laboratory:**
 - **Follow up assessments of the IT Facilities are being performed.**

Significant Planned Activities (next six months)

- **Complete punch list items.**
- **WSCF Startup.**
- **Receive and install analytical equipment and conduct operational testing.**
- **Continue assessments of facilities proposed to perform work under the new awards. Plan to initiate use of IT commercial laboratories in January 1994.**

Milestone Assessment

- **Schedule**

Laboratory construction completed October 1993.

- **Technical**

Commercial Laboratory contracts awarded and follow-up assessments of facilities being performed.

Expense: Cost/Schedule Performance
(project to date)

Budget Performance:

Fiscal Year to Date	1st Qtr	2nd Qtr	3rd Qtr	JUL	AUG	SEP	OCT	NOV
BUDGET	16717	17870	20091	21041	21766	23532	24920	26220
ACTUAL	14184	16336	18658	19562	20058	21926	23117	23947
VARIANCE	2533	1534	1433	1479	1706	1606	1803	2273

VARIANCE EXPLANATION: Contractor and vendor charges have not been received to complete billing entries. Estimated final project cost is \$31,193,000, which includes approximately \$5.0M of equipment charges.

Issues

- **Two protests have been filed by Ecotek on the commercial laboratory contracts. WHC legal has filed Agency Reports with GAO. GAO has 90 working days from date of filing to reply: Protest #1 resolution estimated 12/30/93 and Protest #2 resolution estimated 1/20/94. Still proceeding with technical assessments of commercial laboratories and plan on initiating use of IT in January 1994.**
- **Integration of WSCF Start-up with the Liquid Effluent Program analytical needs. See attached White paper.**

White Paper
WSCF Startup
December 6, 1993

Issue: Due to the delay in startup of the 200 Area Liquid Effluent Treatment facility and reductions in estimates for environmental characterization samples, how should DOE proceed with respect to startup of the Waste Sampling and Characterization Facility (WSCF) scheduled for April 30, 1994 (Interim Milestone M-14-03)?

Background:

The WSCF was descoped and delayed to an April 30, 1994 startup following a lengthy dispute resolution in January 1993. Subsequent to this, discussions arose amongst the parties as to what would entail startup of the laboratory. Even though not formally documented, the consensus seemed to be that all functions would be operational, but not necessarily up to full capacity. As a minimum, the needs of the user programs would be met at startup.

Construction of the laboratory was completed on schedule October 31, 1993 (Interim Milestone M-14-02). Completing construction on schedule required a significant effort due to the default of the US Modular contract.

Startup activities are currently ongoing towards the April 30, 1994 startup. Primary operating functions of the laboratory include:

- 0 Radiochemistry for low-level radioactive samples
- 0 Water Chemistry in support of liquid effluent program
- 0 Quality control analysis
- 0 Support of the Environmental Analytical Laboratory (transportable lab)

Discussion:

Startup of the 200 Area Liquid Effluent Treatment Facility (Project C-018), currently scheduled for October 1994, is being proposed for delay to June 1995 to allow sufficient time for the State to conduct SEPA activities. In addition, the Environmental Restoration program has reduced their projected sample load requiring full analysis, and will be relying more on screening analysis in support of the optimized baseline program. Due to this reduction in characterization samples requiring full analysis, adequate commercial laboratory contracts are currently in place to meet both the production and quality control requirements for the near term. Cost savings would be realized if the startup plan for the WSCF is adjusted to reflect these changes. This is very important due the limited availability of limited funding over the next 4 to 5 years, and possibly longer, and is consistent with the recently negotiated Cost Management Efficiency Initiative.

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Recommendation:

Startup the WSCF on April 30, 1994 as planned, but at a reduced level. The following summarizes the conditions at Startup:

- 0 The radiochemistry activity for lower level radioactive samples will have been transferred from the 222-S laboratory, and would be operational, as planned. As this involves primarily the transfer of existing personnel, cost impact would be minimal.
- 0 Screening of radioactive samples that cannot go to the Environmental Analytical Laboratory will be operational in support of the Environmental Restoration program.
- 0 Startup of the water chemistry functions necessary to support the liquid effluent program will have been delayed, consistent with the needs of the program.
- 0 Performance evaluation testing necessary to establish the capability for performing quality control functions will be initiated, but at a reduced level. A smaller cadre of personnel will be used to proceed with the tests, primarily in series, to establish the capability in support of future needs.

This will result in a reduced funding need for FY 1994 and FY 1995. In addition, slower (or phased) startup of functions such as quality control will allow DOE and its contractors to better manage the acquisition of personnel, resulting in the transfer of existing Hanford staff in lieu of new hires. This should further add to the savings of cost.

Under this recommendation, the M-14-03 milestone should not have to be changed, as the current wording does not specifically describe the conditions at startup.

Note: The agreed to recommendation, once accepted, should be formally documented. This can be accomplished by attaching the final white paper to the project manager's meeting minutes with a statement in the minutes referring to the parties agreement per the attached white paper. Another option would be to document the agreement as part of the C-018 change package, based on the white paper. If a formal letter is necessary, then DOE could transmit the recommendation to Ecology/EPA, who will in turn transmit back letters of concurrence.

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Install RCRA Groundwater Wells

Milestone M-24-00

M. J. Furman

Liquid Waste Branch

December 13, 1993

Install RCRA Groundwater Wells

Milestone M-24-00

Milestone Description

- o M-24-00
(As Amended)**

Install RCRA groundwater monitoring wells at the rate of 29 in CY 1989, 30 in CY 1990, and up to 50 per year thereafter as specified by agreed interim milestones until all land disposal units and single-shell tanks are determined to have RCRA compliant monitoring systems.

- o DELIVERABLE(S)**

Installation of groundwater wells shall mean that wells have been drilled, adequately sealed, and screened over no more than 15 feet of the aquifer unless otherwise approved by Ecology, that all pumps and associated sampling equipment have been installed, and that such wells have been developed sufficiently to provide satisfactory samples for all parameters to be analyzed. Ecology determines that all such groundwater monitoring systems meet the requirements of WAC-173-303-645.

- o BASELINE SCHEDULE**

Install wells annually beginning in CY 1989.

Install RCRA Groundwater Wells

Milestone M-24-00

Accomplishments (September 1993 to November 1993)

- **Drilled two wells to depth.**
- **Backpulled, developed and installed sample pumps on all but last well.**

Install RCRA Groundwater Wells

Milestone M-24-00

Planned Actions (next six months)

- Complete the remaining CY 1993 well.
- Establish milestones for required wells for CY 1994 program.
- Begin 1994 drilling program.

Install RCRA Groundwater Wells

Milestone M-24-00

MILESTONE ASSESSMENT - Schedule CY 1993

- 1325-N Crib(1) - (M-24-30) Drilled in March; sample ready in April.
- Low Level Burial Grounds(2) - (M-24-31) Previously drilled and backpulled well made sample ready. Second well drilled to depth; broken casing problem. Probable delay in completion date because of force majeure event.
- Grout(3) - (M-24-32) Finished drilling and backpulling; all wells sample ready.

Install RCRA Groundwater Wells

Milestone M-24-00

MILESTONE ASSESSMENT (cont'd)

- Budget vs. Cost (\$ in thousands)

Cumulative	OCTOBER	NOVEMBER	FISCAL YEAR
BCWS	354.8	611.9	4738.2
BCWP	164.5	560.1	
ACWP	106.4	250.5	
SV	(190.3)	(51.8)	
CV	58.2	309.6	

Install RCRA Groundwater Wells

Milestone M-24-00

SPECIAL TOPICS

- Change Requests

<u>Change Number</u>	<u>Class</u>	<u>Milestone</u>	<u>Description</u>
M-24-93-3	1	M-24-00E	Force Majeure delay of completion of last well being drilled for CY 93 program, because of broken temporary casing. Recovery efforts are under way. Completion after December 31 almost certain .
		M-24-31	

Install RCRA Groundwater Wells

Milestone M-24-00

SPECIAL TOPICS

LATE-BREAKING NEWS

- Successful Retrieval of Broken Casing on Dec. 11.
- Retrieved 140 feet of casing on Dec. 11. Break is near surface inside larger casing.
- Backpulling operation expected to be complete on Dec. 13.
- Redrilling planned to begin on Dec. 14, four days ahead of recovery schedule.
- Timely completion of milestones possible.

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(ATTACHMENT 4)

Waste Receiving and Processing Module 1

Milestone M-18-00

R. M. Gordon

Waste Management Division

December 13, 1993

Milestone Description

- **M-18-00** **Complete Waste Receiving and Processing (WRAP) Module 1 construction and initiate operations. The WRAP Module 1 is required to sort and repackage wastes that are planned to be retrieved from retrievable storage units. Much of the waste currently stored in the retrievable storage units is anticipated to be radioactive mixed waste. Some of the radioactive waste stored on the pads is known to contain extremely hazardous waste as well as federally land-banned waste.**
- **Deliverable** **The completion of construction and the initiation of Operational Test Procedures (OTP's) and start-up will constitute the deliverable.**
- **Baseline Schedule** **Completion of milestone M-18-00 is scheduled for March 1997**

Accomplishments

- **On November 28, 1993, Key Decision 3 (KD-3, DOE approval to start construction) was received**
- **The WRAP 1 Construction contractor bids for Package 1, Facility and Processing, were opened on November 28, 1993. The apparent low bidder is PCL Construction Services**
- **Awarded contract for engineering during construction**
- **Preliminary Septic Report was submitted to the Washington State Department of Health on November 10, 1993**

Planned Actions

- Award construction contract for Package 1, "Site Facility and Processing Equipment" (December 1993)
- Initiation of site Construction (approximately March 1994 -- Contractor schedule pending)
- Bid and award contracts for Package 2, NonDestructive Examination, and Package 3, NonDestructive Assay (January 1994)
- Obtain approval from Ecology for Notice of Construction (TBD)
- Obtain Washington State Department of Health approval of the Septic Permit (January 1994)

Milestone Assessment

- **Milestones due but not completed (next six months)**
 - **None**
- **Milestone in jeopardy (beyond six months)**
 - **Construction may be impacted due to lack of an approved Notice of Construction from Ecology**
 - **Requested: March 26, 1993**
 - **Critical path need Date: March 1, 1994**

Milestone Assessment (continued)

- Budget vs. Cost (\$ Thousands)

CUMULATIVE

OCTOBER-NOVEMBER

- FY TD Budget*

0.0

- FY TD Cost

941.8

* Budget Not Approved

9413137.1134

(ATTACHMENT 5)

Waste Receiving and Processing Module 2A

Milestone M-19-00

D. W. Claussen

Waste Management Division

December 13, 1993

Milestone Description

This presentation assumes approval of Tri-Party Agreement Change Request M-19-91-01

- **M-19-00** Complete Waste Receiving and Processing (WRAP) Module 2A construction and initiate operations. The WRAP Module 2A will provide treatment for low level radioactive waste and radioactive mixed waste, including wastes generated from environmental remediation. WRAP 2A is critical to achieving compliance for the management of wastes that are restricted from land disposal and extended storage. Start-up is proposed for September 1999.
- **Deliverables** The completion of Construction and the initiation of Operational Test Procedures (OTP's) and start-up will constitute the deliverable.
- **Baseline Schedule** Completion of milestone M-19-00 is scheduled for September 1999.

Accomplishments

Advanced Conceptual Design (ACD)

- **Completed ACD studies**
- **Completed Value Engineering Assessment to optimize the process configuration design basis**
- **Issued feed specification**
- **Revised the Functional Design Criteria (FDC)**

Waste Immobilization Demonstration

- **Issued Process Confirmation Report**
- **Conducted surrogate waste form testing**
- **Completed initial waste form mixing tests**

Two Initial Discussions Held with Washington State Department of Ecology Concerning Privatization of Mixed Waste Treatment

Planned Actions

- **Complete the Advanced Conceptual Design Report (ACDR)
(February 1994)**
- **Obtain Key Decision 1 (March 1994)**
- **Start Preliminary Design (Title I) (March 1994)**
- **Issue the Supplemental Design Requirements Document (SDRD)
(February 1994)**
- **Continue Waste Immobilization Demonstration (WID) activities
(Ongoing)**
- **Continue preparation of Preliminary Safety Analysis Report (PSAR)
Chapters (Ongoing)**

Milestone Assessment

- Milestones due but not complete (next six months)
 - None

- Milestones in jeopardy (beyond six months)
 - None

Special Topics

- Met with the U.S. Department of Ecology on November 24, 1993 and December 7, 1993 to discuss privatization of mixed waste treatment
- Change Requests

<u>CHANGE #</u>	<u>CLASS</u>	<u>MILESTONE</u>	<u>DESCRIPTION</u>
M-19-91-01	1	M-19-00	Split WRAP 2 into WRAP 2A and 2B. Assumed approval by Ecology and EPA

- Privatization

Milestone Assessment (continued)

- Budget vs. Cost (\$ Thousands)

CUMULATIVE

OCTOBER-NOVEMBER

- FY TD Budget*	0.0
- FY TD Cost	979.1

* Budget Not Approved

LAND DISPOSAL RESTRICTIONS ANNUAL REPORT

M-26-01

WASTE MANAGEMENT DIVISION

D. W. Claussen

December 13, 1993

Milestone Description

- **M-26-01** **Submit an annual Hanford Land Disposal Restrictions (LDR) Report in accordance with the LDR Plan to cover the period from April 1 through March 31.**
- **Deliverables** **Submit "1994 Report on Hanford Land Disposal Restrictions for Mixed Wastes" to EPA and Ecology.**
- **Schedule** **Reports submitted annually by April 30.**

Accomplishments

- **Initiated preparation of 1994 report.**

Planned Actions

- Incorporate EPA comments into the 1994 LDR report.
- Continue gathering input for April 1994 report update.

Milestone Assessment - schedule and technical

- Preparation of 1994 updated LDR status report is on schedule.

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

	FY 93 Total	FY 94		FY TOTAL
		Oct	Nov	
- FYTD Budget	137.1	9.4	24.2	141.0
- FYTD Cost:	147.1	8.6	21.2	
- Spending Variance	10.0	0.8	3.0	

PERMITS AND CLOSURE PLANS

Milestone M-20-00

C. E. Clark

**Environmental Permits
U.S. Department of Energy
Richland Operations Office**

December 13, 1993

MILESTONE DESCRIPTION

M-20-00 **Submit Part B Permit Applications or closure plans for all RCRA TSD Units (5-96)**

Deliverable(s) **Complete individual TSD unit submittals in accordance with Appendix D Work schedules (~ 10 submittals per year)**

ACCOMPLISHMENTS (last three months)

Closure Plans

- **Submitted a NOD response table for the following closure plans:**
 - **4843 Alkali Metal Storage Facility (11/4/93)**
 - **304 Concretion Facility (11/30/93)**

- **Submitted revised closure plans for the following units:**
 - **216-B-3 Expansion Ponds (12/15/93)**
 - **303-K Storage Facility (12/15/93)**
 - **304 Concretion Facility (11/30/93)**

ACCOMPLISHMENTS (last three months)

Part A

- **Submitted revised Hanford Facility Part A Permit Application Form 3s for the following units:**
 - **241-CX Tank System, Revision 2 (10/25/93)**
 - **216-B-3 Main Pond, Revision 4 (12/15/93)**
 - **216-B-3 Expansion Ponds, Revision 0 (12/15/93)**
 - **303-K Storage Facility, Revision 4 (12/15/93)**

ACCOMPLISHMENTS (last three months)

Part B

- **Submitted supplemental waste characterization documents to supplement the 305-B Storage Unit and 616 Nonradioactive Dangerous Waste Storage Facility waste analysis plans (WAP). The documents were prepared as an interim response to a July 16, 1993, NOD on the WAPs until they can be revised.**

Research, Development and Demonstration

- **Submitted review comments (11/29/93) to Ecology and the EPA on the Draft Waste Water Pilot Plant RD&D Permit that was issued for public comment on 10/15/93**

PLANNED ACTIONS (next six months)

Unit-Specific Closure Plans

- **Respond to closure plan NODs when received from Ecology for the following units:**
 - **Nonradioactive Dangerous Waste Landfill
(Closure Plan Submitted: 08/31/90) (M-20-07)**
 - **300 Area Waste Acid Treatment System
(Closure Plan Submitted: 11/26/90) (M-20-10)**
 - **100-D Ponds
(Closure Plan Submitted: 2/26/93) (M-20-40)**

PLANNED ACTIONS (next six months)

Unit-Specific Closure Plans (Cont'd)

- **Revise closure plan for Simulated High Level Waste Slurry Treatment/Storage (last submittal June 1990)**
 - **No formal Notice of Deficiency comments from EPA/Ecology**
 - **Current information and regulations being incorporated**

PLANNED ACTIONS (next six months)

Part A

- **Submit revised Hanford Facility Part A Permit Application Form 3s for the following units:**
 - **Single Shell Tank System, Revision 3**
 - **PUREX Plant, Revision 4**

PLANNED ACTIONS (next six months)

Part B

- **Respond to Part B NODs when received from Ecology for the following units:**
 - **242-A Evaporator
(Part B Submitted: 6/30/91) (M-20-17)**
 - **325/3100 Hazardous Waste Treatment Unit
(Part B Submitted: 6/30/92) (M-20-20)**
 - **TRUSAF
(Part B Submitted: 6/30/92) (M-20-23)**
 - **WRAP
(NOD Response Table Submitted: 6/10/93)**

PLANNED ACTIONS (next six months)

Part B (Cont'd)

- **Respond to Part B NODs when received from Ecology for the following units: (Cont'd)**
 - **Liquid Effluent Retention Facility
(NOD Response Table Submitted: 6/24/93)**
 - **Double-Shell Tank System
(NOD Response Table Submitted: 7/13/93)**
 - **Grout, Revision 2
(NOD Response Table Submitted: 7/13/93)**
 - **RMW Storage Facility
(NOD Response Table Submitted: 7/16/93)**

PLANNED ACTIONS (next six months)

Part B (Cont'd)

- **Submit a TPA Change Request to modify Milestone M-20-24 concerning PUREX**
- **Submit Notices of Intent for expansion under interim status for the following Hanford Facility units:**
 - **340 Complex**
 - **242-A Evaporator**
 - **Double-Shell Tank System**
 - **B Plant Complex**
 - **222-S Laboratory Complex**
 - **WRAP**

PLANNED ACTIONS (next six months)

Research, Development and Demonstration

- **Issue Waste Water Pilot Plant RD&D Permit (M-20-49) (EPA/Ecology Action)**
- **Discuss with Ecology and EPA in early 1994 the proposed Hanford RD&D Permitting Strategy**

EPA/State Identification Numbers

- **Continue pursuit of separate identification numbers for non-contiguous waste management areas associated with the Hanford Site (awaiting feedback from Ecology)**

MILESTONE ASSESSMENT

Budget vs. Cost (\$ in 000's)

	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep
FYTD Budget	434	872	1450	2003	2553	3269	3979	4766	5645	6381	6950	8174
FYTD Cost	589	1423										
Variance*	-155	-551										

* Budget is low due to the number of cost account plans that are still in the development stage.

SPECIAL TOPICS

Draft Hanford Facility Permit

- **Draft Hanford Facility Permit preparation**
 - **RL informal review**
 - **Ecology internal review**
 - **Ecology preparation for public review**

- **Target date for reissuance of the Draft Hanford Facility Permit for public comment**

SPECIAL TOPICS - Cont'd

PUREX/UO₃ Deactivation

- **Place the PUREX Plant into a safe and secure shutdown configuration.**
 - **Remove process liquids from the plants**
 - **Terminate liquid effluents/consolidate gaseous effluents**
 - **Shut off steam and water utilities to the plants**
 - **Remove need for frequent personnel entry (surveillance only)**
 - **PUREX Deactivation strategy presented to public on December 10, 1993**

SPECIAL TOPICS - Cont'd

RD&D Permitting Strategy

- **Draft input transmitted to EPA and Ecology on October 29, 1993**
- **Draft input includes:**
 - **Volume 1: Initial conclusions and recommendations**
 - **Volume 2: RCRA permitting options brief**
 - **Volume 3: PNL technology summaries and database**
 - **Volume 4: WHC technology summaries and database**
- **Summary of recommendations:**
 - **For small scale treatability study exemption**
 - **Base waste stream definition on physical and chemical characteristics**
 - **Consider each unit dedicated to analytical and/or experimental activities as a "laboratory or testing facility"**
 - **Raise quantity limits**

SPECIAL TOPICS - Cont'd

- **Summary of recommendations: (Cont'd)**
 - **Prepare RCRA RD&D permits on a programmatic basis rather than individual project basis, where sensible**
 - **Allow research buildings, or portions thereof, to be permitted as Part B TSD facilities; allow changes to proceed as Class 1 modifications**
 - **Allow operational TSD units conducting technology activities and having a Part B to proceed with technology-associated changes as Class 1 modifications**