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TRI-PARTY AGREEMENT

Change Notice Number TPA-CN- 0786	TPA CHANGE NOTICE FORM	Date: 6/20/2017
Document Number, Title, and Revision: DOE/RL-2011-59, *Surveillance and Maintenance Plan for the Plutonium Finishing Plant Complex,* Rev 0 1239194		Date Document Last Issued: June 2016
Approved Change Notices Against this Document:TPA-CN-0746		
Originato T.K. Teynor		Phone 509-376-6363

Description of Change:

Text revised to be consistent with a modification to the referenced Plutonium Finishing Plant (PFP) Complex Endpoint Criteria, Rev. 0 NMS-16404. TPA-CN-0785 modifies NMS-16404.

T.K. Teynor (**DOE**) and S.N. Schleif (**Lead Regulatory Agency**) agree that the proposed change modifies an approved workplan/document and will be processed in accordance with the Tri-Party Agreement Action Plan, Section 9.0, *Documentation and Records,* and not Chapter 12.0, *Changes to the Agreement.*

Affected page number(s): 3, 6, 7, 19

Justification and Impacts of Change:

Modified document to incorporate changes made in TPA-CN-0785 for NMS-16404, Plutonium Finishing Plant End Point Criteria Document Rev 0.

Modifications are denoted using ~~strikeout~~ for deletions and double underline to indicate text additions.

Approvals:

T.K. Teynor, DOE Project Manager	June 27, 2017 Date	[X] Approved [ ] Disapproved
NA EPA Project Manager	Date	[ ] Approved [ ] Disapproved
S.N. Schleif, Ecology Project Manager	6/27/17 Date	[X] Approved [ ] Disapproved

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1.2 Milestones

Tri-Party Agreement Major Milestone M-083-00A, *Proposed Tri-Party Agreement Modifications and Reference Documents for Plutonium Finishing Plant Transition and Selected Disposition Milestones (M-83-00A)*, (Ecology et al., 1989a, *Hanford Federal Facility Agreement and Consent Order*), has three key elements:

1. "Completion of all activities necessary to achieve end point criteria established through Milestone M-83-20 for placing the PFP facility in a safe and stable S&M mode."
2. "Completion of all activities described in the approved M-83 series interim milestones and target date."
3. "Completion of the balance of PFP selected disposition activities pursuant to the final action memoranda and work plans."

Upon completion of Milestone M-083-00A, PFP will transition to S&M under this S&M Plan, which was developed in accordance with Target Milestone M-083-24-T01.

In late 2015, Ecology and the DOE, Richland Operations Office agreed on removal of slabs for the 236-Z and 242-Z Buildings, following removal of the above-grade structures, to reduce potential residual radiological inventory in the PFP Complex area. The RAWP (DOE/RL-2011-03) and End Point Criteria document (HNF-22401) were updated using Tri-Party Agreement change notices (TPA-CN-681 and TPA-CN-682, respectively) to allow this change. TPA-CN-682 was subsequently superseded by TPA-CN-0785. Consequently, this plan describes an S&M phase with two distinct stages: an initial stage where post-transition actions, such as slab removal, will take place to reduce hazards further, and a caretaker stage pending final remedial action. These stages are further described in Chapter 2 of this plan.

1.3 Purpose and Scope

The purpose of this S&M Plan is to identify actions necessary to maintain safe and stable conditions until implementation of future remedial actions. The scope of this plan is limited to S&M of the items listed in Tables 1 and 2 within the fenced area shown in Figure 1. The east side of the PFP Complex (outside the fenced area) is the support area. This area contains mobile offices, parking lots, the 2607-WA Septic System (southwest corner of the intersection of 19th Street and Camden Avenue), and the 212-Z Lag Storage Yard. The mobile offices, parking lots, 212-Z lag storage yard, and septic system will remain active for an extended period and are not addressed by this S&M Plan. The 241-Z-361 tank, while inside the fence, has been included in the 200-PW-1/3/6 OU remedial action (EPA et al., 2011, Record of Decision Hanford 200 Area Superfund Site 200-CW-5 and 200-PW-1, 200-PW-3, and 200-PW-6 Operable Units) and, therefore, is not included in this S&M Plan.

The scope of this plan may be modified in accordance with the Tri-Party Agreement process for primary document changes as items transition from active to inactive status or transition to coverage under other documents. Activities performed according to this S&M Plan will be conducted in accordance with applicable or relevant and appropriate requirements (ARARs) under CERCLA authorization.

Table 1. Building Slabs

Identification	Description	Identification	Description
232-Z	Waste Incinerator Facility	267-Z	Fire Riser Valve House
234-5Z	Plutonium Fabrication Facility	296-Z-3	241-Z Stack

drawings, available characterization information, location and condition of remaining features, and similar information of particular importance during longer term S&M.

2.1 Stage 1 S&M Expected Conditions and Activities

At the time of transition to S&M, all end point criteria pre-transition actions will have been completed. Documentation verifying completion will be provided in appendices to each of the EPCC documents. A brief summary of expected conditions at the beginning of Stage 1 S&M follows:

- Process and storage facilities, and their supporting ancillary structures, will have been removed to slab on grade.
- ~~Areas with residual radioactive contamination will have been placed in a safe and stable condition that satisfies underground radioactive material area (URMA) requirements.~~
- ~~Radiological and other required postings (e.g., vehicle exclusion areas and confined spaces) will be in place.~~
- Hazardous materials and transuranic (TRU) wastes will have been removed from accessible below-grade spaces.
- Ventilation ducting will have been isolated and sealed at building boundaries.
- Buried piping that entered or exited buildings will have been checked for liquids and drained if needed.
- Process drains to 243Z/ZA will have been flushed.
- The 241Z RCRA unit will have been clean closed (see Section 2.2.3).
- Drain lines, vents, and penetrations will have been isolated and sealed.
- No plutonium that poses a significant security risk or criticality potential will remain in underground systems.
- Unattached materials and equipment in below-grade spaces in buildings will have been removed and the space stabilized to prevent release of contamination and structural collapse.
- ~~Manhole covers to inactive systems will be isolated or sealed to prevent water intrusion and removal from confined space listing.~~
- ~~PFP Complex electrical supply will be isolated at a point minimizing dead legs.~~
- Septic tanks 2607-Z and 2607-Z1 will be backfilled.
- Asbestos from above~~Above~~-grade steam lines will be removed.
- ~~Inactive PFP Complex utility poles will be removed.~~
- TRU waste (e.g., equipment, piping, and ducting) in accessible below-grade spaces will have been removed or decontaminated to the point that remaining equipment, piping, and ducting could be dispositioned as low-level waste.

During Stage 1 S&M, slab removal and other EPC post-transition actions will take place. The following is a summary of actions that will be conducted in accordance with the RAWP (DOE/RL-2011-03).

- Remove 242-Z and 236-Z slabs.
- Finalize characterization data for remaining tubing, piping, ducting, and drain lines and identify and label those containing contamination.
- Remove, fix, and contain any radiological contamination. Areas with residual radioactive contamination will have been placed in a safe and stable condition that satisfies underground radioactive material area (URMA) requirements.
- Install contamination control caps where required.
- Perform final radiological survey to document radiological conditions.
- Remove miscellaneous above-grade structures and materials.
- Remove and dispose of waste and verify/document elimination of waste accumulation areas.
- Isolate or seal manhole covers to inactive systems to prevent water intrusion and to eliminate confined spaces.
- Isolate the PFP Complex water and electrical supplies ~~supply at a point minimizing~~ to minimize isolation points and dead legs.
- Remove remaining above-grade steam lines and supports inside the PFP Complex.
- Remove inactive PFP Complex utility poles.
- Grade soil to promote drainage away from below-grade structures.
- Stabilize soil to mitigate dust and erosion.
- Provide posting as needed (e.g., radiological, confined space, vehicle restrictions).
- Provide controls to prevent unauthorized access.
- Compile documentation for remaining industrial hazards, radiological issues, and hazardous substances.
- Develop S&M procedures.
- Fulfill remaining RAWP (DOE/RL-2011-03) and End Point Criteria document (HNF-22401) regulatory commitments, and prepare regulatory documentation.

2.2 Stage 2 S&M Expected Conditions

Following completion of remaining RAWP and end point criteria document requirements, the PFP Complex will transition to Stage 2 S&M (i.e., long-term S&M pending final remediation). All remaining components (structure slabs, underground portions of the original structures, pipelines, tanks, and potentially contaminated soil below or around the original structures) will be evaluated under the CERCLA process to determine potential threats to human health and the environment and, if determined to need further action, assigned to an OU and added to Appendix C of the Tri-Party Agreement Action Plan (Ecology et al., 1989b).

The area subject to this S&M Plan will be controlled with a continuous chain link fence with locked access points. High mast lights may remain in place. The following active structures and equipment will remain in place and are not covered by this S&M Plan:

- 2702-Z cell tower and support building, along with associated active utility poles
- 2607-Z-1 sewage lift station and associated main sewer line through the PFP Complex
- Groundwater monitoring well ~~299-W15-42~~

Ecology, EPA, and DOE, 1989a, *Hanford Federal Facility Agreement and Consent Order*, 2 vols., as amended, Washington State Department of Ecology, U.S. Environmental Protection Agency, and U.S. Department of Energy, Olympia, Washington. Available at: http://www.hanford.gov/?page=81.

Ecology, EPA, and DOE, 1989b, *Hanford Federal Facility Agreement and Consent Order Action Plan*, as amended, Washington State Department of Ecology, U.S. Environmental Protection Agency and U.S. Department of Energy, Olympia, Washington. Available at: http://www.hanford.gov/?page=82.

EPA, Ecology, and DOE, 2011, *Record of Decision Hanford 200 Area Superfund Site 200-CW-5 and 200-PW-1, 200-PW-3, and 200-PW-6 Operable Units*, U.S. Environmental Protection Agency, Washington State Department of Ecology, and U.S. Department of Energy, Olympia, Washington. Available at: http://pdw.hanford.gov/arpir/index.cfm/viewDoc?accession=0093644.

H-2-29620, 2010, *Structural Concrete Foundation Plan & Details*, Rev. 6, CH2M HILL Plateau Remediation Company, Richland, Washington.

HNF-22401, 2004, *Plutonium Finishing Plant (PFP) Complex End Point Criteria*, Rev. 0, Fluor Hanford, Inc., Richland, Washington. Available at: http://pdw.hanford.gov/arpir/index.cfm/viewDoc?accession=D6455017.

Modified by:

~~TPA-CN-682, 2015, *Tri-Party Agreement Change Notice Form: NMS-16404, Plutonium Finishing Plant (PFP) Complex Endpoint Criteria, Rev 0 [also identified as HNF-22401, Rev 0]*, dated November 5, U.S. Department of Energy, Richland Operations Office, U.S. Environmental Protection Agency, and Washington State Department of Ecology, Richland, Washington. Available at: http://pdw.hanford.gov/arpir/index.cfm/viewDoc?accession=0079499H~~

TPA-CN-0785, 2017, *Tri-Party Agreement Change Notice Form: NMS-16404, Plutonium Finishing Plant (PFP) Complex Endpoint Criteria, Rev 0 [also identified as HNF-22401, Rev 0]*, dated June 20, U.S. Department of Energy, Richland Operations Office, and Washington State Department of Ecology, Richland, Washington.

HNF-33999, 2007, *241-Z As Left Characterization*, Rev. 0, Fluor Hanford, Inc., Richland, Washington.

M-083-00A, 2002, *Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement): Proposed Tri-Party Agreement Modifications and Reference Documents for Plutonium Finishing Plant Transition and Selected Disposition Milestones (M-83-00A)*, U.S. Department of Energy, Richland Operations Office, U.S. Environmental Protection Agency, and Washington State Department of Ecology, Richland, Washington, January 30. Available at: http://pdw.hanford.gov/arpir/index.cfm/viewDoc?accession=D9084946.

Resource Conservation and Recovery Act of 1976, 42 USC 6901, et seq. Available at: http://www.epa.gov/regulations/laws/rcra.html.