



Department of Energy

Richland Operations Office
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9206453

SEP 22 1992

92-0B-123

Mr. Paul T. Day
Hanford Project Manager
U.S. Environmental Protection Agency
Region 10
712 Swift Boulevard, Suite 5
Richland, Washington 99352

Mr. David B. Jansen
Hanford Project Manager
State of Washington
Department of Ecology
Post Office Box 47600
Olympia, Washington 98504-7600



Dear Messrs. Day and Jansen:

REQUEST FOR DELAY OF INTERIM STABILIZATION MILESTONE

- References: (1) Letter from R. L. Stanley, Ecology, to J. P. Hamric, RL, "USDOE-RL Response to Ecology's C-106 Letter, dated 6/1/92," dated July 2, 1992. *28121*
- (2) Letter from D. B. Jansen, Ecology, to S. H. Wisness, RL, Ecology's response to Reference (of 5/4/92), dated June 8, 1992. *21413*
- (3) R. L. Stanley, Ecology to J. P. Hamric, RL, "Contingency Planning and Corrective Actions for Single-Shell Tank 241-C-106," dated June 1, 1992. *20851*
- (4) Letter from J. D. Wagoner, RL, to D. A. Rasmussen, EPA, and C. Clarke, Ecology, "Interim Stabilization of Single-Shell Tanks at Hanford Site," 92-TPA-043, dated May 4, 1992. *19142*
- (5) Letter from S. H. Wisness, RL, to P. T. Day, EPA, and D. B. Jansen, Ecology, "Creation of Danger, Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement)," 92-TPA-022, dated February 14, 1992. *23351*
- (6) Letter, David B. Jansen, Ecology, to Steve Wisness, RL, "Initiation of Milestones M-05 and M-07 TPA Negotiations", dated September 8, 1992. *16092*
- (7) Letter, John D. Wagoner, RL, to Christine Gregoire, Ecology, and Dana Rasmussen, EPA, "Interim Stabilization of Single-Shell Tanks (Milestone M-05-00)", dated September 9, 1991.



The Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) interim milestone M-05-04, "Interim stabilize nine single-shell tanks," is due by September 1992. This milestone cannot be met as currently written.

This milestone has been the subject of correspondence and technical discussions between the U.S. Department of Energy, Richland Field Office (RL), Washington State Department of Ecology (Ecology), and the U.S. Environmental Protection Agency (EPA) in an effort to develop a mutually acceptable change to Tri-Party Agreement milestone M-05-00 and its interim milestones. The negotiation process for changes to this major milestone is still in process, and the milestone M-05-04 completion date of September 1992 is drawing closer.

In Reference 4, Mr. J. D. Wagoner, RL Manager, requested that the regulators consider delaying the milestones while in the negotiation process for this change. Ecology disapproved a blanket approval of this delay (Reference 2), but remained open to considering this action on a case-by-case basis.

RL believes this to be one of those cases. A condition was identified and communicated in Reference 5, wherein a "creation of danger" existed which continues to currently impact the ability to proceed toward meeting interim milestone M-05-04. During subsequent milestone management review and unit manager meetings, RL notified regulators of a fissile material accountability concern in the tank farms. Due to this concern, all waste transfer activities in support of the interim stabilization process were immediately stopped. An interim justification for continued limited tank farm operations has since been approved, but waste transfers continue to be prevented by this safety issue which has to date impacted the interim stabilization milestone for a period of more than 200 days.

The regulators concurred with a delay of Tri-Party Agreement milestone M-15-02A. "200-BP-1 Draft Feasibility Study" because of a separate creation danger concern, thereby establishing a precedent. A specific change request for M-05-04 was not requested at that time due to the belief that the milestone revision process would have been completed more expeditiously. Even if a "creation of danger" delay had been requested for M-05-04, the milestone completion date would remain impacted, and a day-by-day slip of the scheduled date would be the current result.

Mr. R. L. Stanley, Ecology, has reiterated in correspondence (References 1 and 3) the importance of this milestone, and has provided suggested changes to this milestone (Reference 3). The involved parties have met to discuss his proposals, reached a mutual agreement on them, and have agreed to incorporate those into a change package for milestone M-05-00.

Attached is a change package requesting a 120-day extension of the completion date for interim milestone M-05-04. Based on the existing facts, RL believes this extension to be warranted, and believes that the extension would allow sufficient time with which to adequately address Mr. Stanley's concerns, and to allow the Tri-Party Agreement to be modified in a manner that would provide a viable, realistic approach to mitigating the potential for leaks from

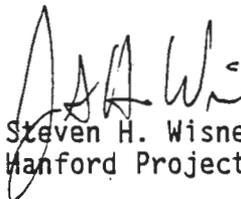
single-shell tanks at the Hanford Site. RL also requests that you consider the attached draft change in the realization that it is not a final step, but rather that it is a progressive step being made in this complex and important area. RL will be ready to address your specific requests for renegotiation of the M-05 Milestone contained in reference six shortly.

As discussed in reference seven, RL has encountered substantial difficulty in accomplishing the interim milestones as presently described in Tri-Party Agreement Milestone M-05. The details of these difficulties have been related to you in numerous subsequent discussions and correspondence. Therefore, RL believes there is no issue of timeliness in the submission of this extension request to you at this time.

As allotted by the Tri-Party Agreement, it is requested that you take action on the attached Tri-Party Agreement Change Control Form within seven days of receipt of this correspondence, and respond to me with your decision.

If you have any questions, contact me on (509) 376-6798, or Mr. J. K. Yerxa of my staff on (509) 376-9628.

Sincerely,



Steven H. Wisness
Hanford Project Manager

TFP:GEB

Attachment:
Federal Facility Agreement and
Consent Order Change Control
Form M-05-92-02A

cc w/attach:
S. McKinney, Ecology
D. Sherwood, EPA
D. Pabst, WHC
R. Raymond, WHC
T. Veneziano, WHC

Change Number M-05-92-02B	Federal Facility Agreement and Consent Order Change Control Form <small>Do not use blue ink. Type or print using black ink.</small>	Date September 18, 1992
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Originator G. E. Bishop/R. E. Raymond	Phone 373-2113/373-2785
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Class of Change <input type="checkbox"/> I - Signatories <input checked="" type="checkbox"/> II - Project Manager <input type="checkbox"/> III - Unit Manager
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Change Title Administrative Delay to Fiscal Year 1992 Interim Stabilization Milestone

Description/Justification of Change: This change would provide a 120 day delay to the FY 1992 interim stabilization milestone, M-05-04, to allow the parties time to complete a major renovation to the major milestone. It will also incorporate new milestones as previously agreed in the area of single-shell tank leak detection. These changes are:

Milestone	Description	Due Date
M-05-04	Interim stabilize an additional 9 single-shell tanks (was September 1992)	January 1993
M-05-10	Provide basis for current water addition practices and status on measures to minimize water additions for tanks 241-C-105 and C-106 to EPA and Ecology.	September 1992
M-05-11	Provide a revised contingency plan for leaks from 241-C-106 to EPA and Ecology.	January 1993
M-05-12	Provide to Ecology and EPA a plan which evaluates actions, schedules, and cost impacts for removing tank contents from 241-C-106.	September 1992

continued on next page

Impact of Change This change will delay one existing interim milestone by 120 days and adds three new interim milestones. No other TPA activities are affected by this change.

Affected Documents
Hanford Federal Facility Agreement and Consent Order Action Plan, Appendix D (Table D-1 and Figure D-1 Work Schedule).

Approvals	<input type="checkbox"/> Approved	<input type="checkbox"/> Disapproved
DOE 		9/22/92
		Date
EPA		Date
Ecology		Date

HANFORD FEDERAL FACILITY AGREEMENT AND CONSENT ORDER
CHANGE CONTROL FORM
(continued)

Change Title Administrative Delay to Fiscal Year 1992 Interim Stabilization Milestone

Description/Justification of Change (continued)

<u>Milestone</u>	<u>Description</u>	<u>Due Date</u>
M-05-13	Upgrade leak detection and site characterization at tanks 241-C-105 and 241-C-106.	Mar 1993
M-05-13-T1	Initiate monthly psychrometric measurements at 241-C-105 and 241-C-106 commencing fiscal year 1993, to be taken while exhausters are operating.	Jan 1993
M-05-13-T2	Complete physical logging of 14 dry wells at 241-C-105 and 241-C-106 using a spectral gamma probe.	Mar 1993
M-05-13-T3	Reduce the logging speed of the gross gamma probes for the 14 dry wells around 241-C-105 and 241-C-106.	Oct 1992
M-05-13-T4	Provide to EPA and Ecology a plan for further improvements in gross gamma probe.	Dec 1992

