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Meeting Minutes Transmittal

PUREX Plant/Storage Tunnels Unit Managers Meeting
Federal Building, Room 784B
Richland, Washington

August 9, 1995
2:00 p.m. - 3:30 p.m.

The undersigned indicate by their signatures that these meeting minutes reflect the actual occurrences of the above-dated meeting.

Richard X. Gonzalez Date: 9/14/95
Richard X. Gonzalez, Unit Manager, DOE-RL

Date: 9/14/95
Robert Julian, Unit Manager, Washington State Department of Ecology

Daniel L. Duncan 9/19/95
Daniel L. Duncan, RCRA Program Manager, EPA Region 10

Lucinda L. Grant Date: 10/2/95
Lucinda L. Grant, Washington State Department of Health

Date: 14 SEP '95
Gregory J. LeBaron, PUREX Contractor Representative, WHC

Purpose: Discuss PUREX Deactivation Process

Meeting Minutes are attached. The minutes are comprised of the following:

Attachment 1 - Agenda
Attachment 2 - Summary of Discussion and Commitments/Agreements
Attachment 3 - Attendance List
Attachment 4 - Action Items
Attachment 5 - TPA Milestone Status/PUREX Deactivation Status
Attachment 6 - Listed Waste Status

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Attachment 1

PUREX PLANT/STORAGE TUNNELS UNIT MANAGERS' MEETING
Federal Building, Richland, Washington
Wednesday, August 9, 1995

- AGENDA -

2:00 PM - 3:30 PM INTRODUCTIONS

APPROVE PAST MEETING MINUTES

STATUS ITEMS

- TPA progress
  - Amendment 5
  - M-80 Milestones
- Listed waste
- PUREX Storage Tunnels Part B
- PUREX transition status

TOPICS FOR DISCUSSION

- Receipt of 300 Area waste
  - PUREX Plant and Storage Tunnels Part A permitting
  - Air permitting issues

GENERAL TOPICS

- Additional topics
- Action items
  - Past action items
  - New action items
- Scheduling of next meeting

The videoconference meeting will link Seattle and the Federal Office Building (room 784-B) in Richland.

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Attachment 2

PUREX Plant/Storage Tunnels Unit Managers Meeting
Federal Building, Room 784-B
Richland, Washington

August 9, 1995
2:00 p.m. - 3:30 p.m.

Summary of Discussion and Commitments/Agreements

APPROVE PAST MEETING MINUTES

Mr. G. LeBaron (WHC) made a correction to the June 29, 1995 Unit Manager Meeting minutes. Under the topic of PUREX Transition Status, the last sentence states that "samples have been taken from L Cell and WHC/RL have requested a rush on the sample results." Mr. LeBaron indicated that the statement was incorrect, and the sentence was crossed out. The minutes were approved by Mr. R. Julian (Ecology). The minutes will be sent to Mr. D. Duncan (EPA) for signature.

STATUS ITEMS

- **TPA Progress**

  Amendment 5

  Mr. R. Bowman (WHC) reported that Amendment 5 of the Tri-Party Agreement (TPA) was approved on July 28, 1995. Mr. Julian and Mr. Duncan requested two copies of Amendment 5.

  M-80 Milestones

  Mr. LeBaron distributed a handout regarding the TPA milestone status (Attachment 5). Mr. LeBaron noted that Milestone M-80-03 (remove process waste solutions from Tanks D5 and E6) was due to be completed by January 1997, and it has already been completed.

- **Listed Waste**

  Mr. Julian distributed a handout (Attachment 6) addressing Ecology's position with regard to the PUREX listed waste issue. This position will be utilized by RL to determine certain permitting and management options related to PUREX and downstream facilities. The 2-21-95 letter referred to in Attachment 6 was included as Attachment 9 in the June 29, 1995 Unit Manager Meeting minutes.

- **PUREX Storage Tunnels Part B**

  Mr. Bowman stated that the following chapters from the PUREX Storage Tunnels Part B permit application will be transmitted to Ecology on 8-11-95: the draft Waste Analysis Plan; the PUREX

Storage Tunnels Inventory Table; the Dangerous Waste Inspection Plan; the Training Plan and the Inspection Plan.

Following Ecology's review of the above-listed chapters, a meeting will be scheduled with RL/WHC and Ecology to discuss Ecology's comments. Mr. Bowman added that the Part B permit application will be submitted to Ecology on November 15, 1995, for inclusion in modification B of the RCRA Hanford Facility Permit.

- **PUREX Transition Status**

Mr. LeBaron provided an update regarding the PUREX deactivation status (see Attachment 5). Mr. Duncan inquired about the schedule for completing shipment of the nitric acid. Mr. LeBaron responded that the shipment is targeted for completion by December 1995.

Regarding the disposition of the approximately 21,000 gallons of organic material in Tank 40, Mr. R. Gonzalez (RL) referred to discussions among RL, Ecology and the contractor (DSSI) in Tennessee who is receiving the waste. Mr. G. Pollett had raised the question whether the organic material is a carcinogenic dangerous waste and if the Federal Facilities Compliance Act (FFCA) is applicable. Mr. Gonzalez stated that the organic is designated as a Washington State dangerous waste and therefore DSSI does not consider the organic material a hazardous waste. Mr. Gonzalez added that Mr. T. Tebb (Ecology) discussed the issue with Mr. Pollett, and RL considers the issue satisfactorily addressed.

Regarding the canyon flushing activities (see Attachment 5), Mr. LeBaron noted the following errors on the second bullet under N Cell activities: N23 should be corrected to N2B, and N13 should be corrected to N1B.

TOPICS FOR DISCUSSION

- **Receipt of 300 Area Waste**

Mr. LeBaron provided a brief status of the 324 Building waste (see Attachment 5). Mr. Bowman noted that RL/WHC are pursuing a revision to the State of Washington Environmental Policy Act (SEPA) checklist to address storage of waste (other than waste from the PUREX Plant and Storage Tunnels) in the tunnels. RL/WHC intend to submit the revised SEPA checklist with the PUREX Tunnels Part B permit application.

Mr. Duncan asked about the composition of the Hanford waste. Mr. LeBaron responded that identification of Hanford waste is being left open to include other waste codes that would be covered under the Part A permit application.

Mr. Duncan inquired about the schedule for moving the 324 waste into the PUREX Storage Tunnels. Mr. LeBaron stated the goal is to start moving the waste in September 1995.

PUREX Plant and Storage Tunnels Part A Permitting

The PUREX Plant and Storage Tunnels Part A's have been modified and will be transmitted to Ecology for review within two weeks. Mr. LeBaron noted that the PUREX Tunnels Part A will include all the waste codes for the 324 Building waste.

Air Permitting Issues

Mr. Bowman stated that the purpose of discussing air permitting issues was to identify the Department of Health (DOH) plans with respect to the 324 Building (PNL) and the impact any air permitting issues may have on the transfer of the 324 waste to the PUREX facility. Ms. C. Grant (DOH) stated that the DOH issued a stop work order at the 324 Building until it is confirmed that the removal of the 324 waste is a safe undertaking. The DOH is waiting for receipt of a Notice of Construction (NOC) from PNL.

Mr. Bowman inquired about the potential impact on RL/WHC's schedule for transferring the 324 waste through the PUREX facility. Ms. Grant responded that it was dependent upon DOH's review of the 324 Building information and receipt of PNL's NOC. Ms. Grant noted that the DOH inspected the PUREX exhauster yesterday (8-8-95) to determine whether it was capable of handling the added source term.

GENERAL TOPICS

- **Additional Topics**

  It was agreed to include Ms. Grant as a DOH signatory for the Unit Manager Meeting minutes.

  Mr. Duncan inquired about the four rail cars located outside the fence near the PUREX facility. Mr. LeBaron stated that the rail cars are not considered a PUREX issue. It was agreed to provide a status of the rail cars if they are to be stored in the PUREX Tunnels.

- **Action Items**

  Past Action Items

  Action item 3-2-95:2, Mr. Jaraysi will provide RL/WHC a letter responding to the revised PUREX Plant Part A permit application.

  RL/WHC received a letter from Ecology. This action item was closed.

  Action item 4-6-95:1, Ecology and EPA will provide RL/WHC a letter clarifying their regulatory interpretation of "empty" tanks.

  This action item was left open.

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New Action Items

There were no new action items generated.

- **Scheduling of Next Meeting**

  The next Unit Managers Meeting was scheduled for a videoconference on September 14, 1995, from 2 p.m. to 3:30 p.m.

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Attachment 3

PUREX Plant/Storage Tunnels Unit Managers Meeting
Federal Building, Room 784B
Richland, Washington

August 9, 1995
2:00 p.m. - 3:30 p.m.

Attendance List

A stenographer is present to take detailed notes on the proceedings of this meeting. These notes will be used for the sole purpose of preparing Unit Manager Meeting minutes. After these Unit Manager Meeting minutes are finalized, the detailed notes will be discarded. If any attendee has objections with this approach, they should voice these objections at this time.

Name	Organization	Phone #
Kathy Knox	WHC	372-3596
Robert J. Julian	Ecology	736-5702
Mike Stephenson	WHC	376-3870
JEFF MORICILLE	DAMES & MOORE/GSSC	946-3685
ELLEN MATTLIN	DOE-RL	376-2385
RICK GONZALEZ	DOE, RL	3739922
Roger Bowman	WHC	376-4876
GREG LEBARON	WHC	3-1792
Dan Duncan	EPA	(206) 553-6693
Cindy Grant	Wa. DOH	(206) 464-6206

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Attachment 4

PUREX Plant/Storage Tunnels Unit Managers Meeting
Federal Building, Room 784-B
Richland, Washington

August 9, 1995
2:00 p.m. - 3:30 p.m.

Action Items

Action Item	Description
03-02-95:2	Mr. M. Jaraysi (Ecology) will provide RL/WHC a letter responding to the revised PUREX Plant Part A permit application. ACTION: M. Jaraysi (Ecology) **CLOSED**
04-06-95:1	Ecology and EPA will provide RL/WHC a letter clarifying their regulatory interpretation of the term "empty" tanks. ACTION: M. Jaraysi (Ecology) and D. Duncan (EPA) **OPEN**
05-25-95:1	RL will include Mr. M. Jaraysi (Ecology) on the mailing list for the 30-day rolling schedule for transporting nitric acid. ACTION: R. Gonzalez (DOE-RL) **CLOSED**
05-25-95:2	RL will provide Mr. M. Jaraysi (Ecology) and Mr. D. Duncan (EPA) a copy of the final EA for the nitric acid shipment. ACTION: R. Gonzalez (RL) **CLOSED**
05-25-95:3	RL/WHC will provide Ecology with a copy of cleanout videos related to the removal of fuel from A, B, and C Cells, if available. ACTION: G. LeBaron (WHC) **CLOSED**
05-25-95:4	RL/WHC will provide Ecology with a copy of the inspection reports for the first month of weekly inspections for the rail cars containing nitric acid heels. ACTION: G. LeBaron (WHC) **CLOSED**

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Attachment 5

PUREX Plant/Storage Tunnels Unit Managers Meeting
Federal Building, Room 784-B
Richland, Washington

August 9, 1995
2:00 p.m. - 3:30 p.m.

TPA MILESTONE STATUS/PUREX DEACTIVATION STATUS

#5 PUREX 8-4-95

TPA MILESTONE STATUS

Dec 94	M-80-00-T01 Issue USDOE approved End Point Criteria for the UO_3 Plant. (94-POT-060)
Apr 95	M-08-01 Complete Deactivation of PUREX Plant R-Cell. (95-PUREX-031)
Jun 95	M-80-00-T02 Complete all UO_3 Plant Transition Activities and Initiate S&M Phase (95-PUREX-021)
Jun 95	M-80-00-TO3 Submit options and recommendations for final management of Tank 40 organic material to EPA and/or Ecology in accordance with their respective authorities

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TPA MILESTONE STATUS (Cont.)

Jun 95	M-80-02-T01 Submit proposed End Point Criteria for Transition of PUREX (95-PUREX-042)
May 96	M-80-02-T02 Submit PUREX Surveillance and Maintenance Plan
Jun 96	M-80-00-T04 Complete removal of concentrated (recovered) 203-A Nitric Acid at PUREX
Jul 96	M-20-24A Submit a PUREX Preclosure Work Plan to EPA and Ecology

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TPA MILESTONE STATUS (Cont.)

Jul 96	M-80-02 Submit the end point criteria and surveillance and maintenance plan in support of the PUREX Preclosure Work Plan
Jan 97	M-80-03 Remove Process Waste Solutions from Tanks D5 and E6 (95-PUREX-047)

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PUREX DEACTIVATION

STATUS

G. J. LeBaron
9 Aug 1995

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FUEL TRANSFER TO K BASINS

- Fuel transfer targeted for October 1995
  - Transfer to K West
  - NEPA documentation has been completed
  - NESHAPs documentation approved by EPA
  - Shipments dependent on approval of NOC
  - Cask car water replacement in progress

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203-A AREA

- Began loadout/shipping nitric acid (05/18/95)
  - On Schedule
- 22 containers loaded with 3700 gallons per container (about 82,500 gallons)

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ORGANIC DISPOSITION

- Contract is being finalized with DSSI to dispose of organic (NPH/TBP)
- ~ 21,000 of organic will be destroyed by thermal destruction
- Transport containers are being identified

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CANYON FLUSHING ACTIVITIES

- Completed
  (K cell, G & R cells [Part A & B], backcycle waste, cladding waste, Tk-G7, Tk-156)

- Awaiting RCRA sample results
  (Head End)

- Currently flushing
  (L Cell [reflush])

- Future flushing
  (U cell, Tk-U1/U2, F11 system, D5/E6/F15/F16 system, Tk-U3/U4)

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N CELL

- Continue to clean dry glove boxes and load out waste ~45% complete
- Finished capping lines in 2 wet glove boxes (N6 & N7) Need to finish N2C, N2A, N23, N1A & N13

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324 BUILDING WASTE

- Planning to receive identified waste items for storage
  - Modified Part A s
  - Revising Part B to include Hanford Waste
  - Pursuing DOH & EPA approvals
  - Safety analysis drafted and in review
- Final decision to receive waste made by DOE
  - Dependent on impact to PUREX Deactivation

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Attachment 6

PUREX Plant/Storage Tunnels Unit Managers Meeting
Federal Building, Room 784-B
Richland, Washington

August 9, 1995
2:00 p.m. - 3:30 p.m.

LISTED WASTE ISSUE

9513383.2242

#6
PUREX
8-9-95

On February 21, 1995, the Department of Energy, Richland Operations received a letter from Dan Duncan of EPA-Region 10, and Moses Jaraysi of the Washington State Department of Ecology, regarding interim status issues at PUREX. This letter addressed the issue of listed dangerous waste codes.

In keeping with this letter and with other formal and informal communications regarding this subject, the Washington State Department of Ecology has determined, based on the exercise of its enforcement discretion that:

1) Listed waste codes associated with the PUREX laboratory solvents will not be required to be added to the Part A Application for PUREX.

2) RL will not be required to designate waste managed in or generated from the PUREX facility as a listed waste solely because of PUREX laboratory listed waste concerns.

3) At the time of final disposition of any waste from the PUREX facility, all constituents of concern shall be addressed in the sampling plan and in the assessment of final disposal options.

The above cited letter is attached as Attachment 9 in the June 29, 1995 PUREX Unit Manager Meeting minutes.

The issue of dangerous listed waste codes associated with the Part B Application for the PUREX storage tunnels, the Part A permit for crib 216-A-10 will be discussed in future respective Unit Managers Meetings.

The United States Department of Energy, Richland Operations Office will not be required to designate waste managed in or generated from the PUREX storage tunnels, crib 216-A-5, 216-A-10, and 216-A-45, as a listed waste solely because of PUREX laboratory listed waste concerns.

In addition, at the time of final disposition of any waste from the PUREX storage tunnels, the associated cribs, and vessels, all constituents of concern shall be addressed in the sampling plan and in the assessment of final disposal options.

The Department of Energy, Richland Operations Office may evaluate and request a "contained-in" determination at any stage of waste management closure, or cleanup under CERCLA, at these facilities.

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Distribution:

L. D. Arnold	WHC	B2-35
R. A. Bhatia	WHC	H6-23
R. C. Bowman	WHC	H6-24
R. C. Brunke	WHC	H6-23
R. M. Carosino	RL	A4-52
C. E. Clark	RL	A5-15
M. W. Cline	WHC	H6-24
A. W. Conklin	DOH	
D. L. Duncan	EPA	HW-106
R. X. Gonzalez	RL	R3-79
L. L. Grant	DOH	
E. M. Greager	WHC	H6-20
D. G. Hamrick	WHC	S6-15
D. G. Harlow	WHC	S6-19
J. P. Hayfield	WHC	S6-18
M. N. Jaraysi	Ecology	B5-18
W. G. Jasen	WHC	S6-17
R. J. Julian	Ecology	B5-18
R. C. King	Ecology	Lacey
P. J. Krupin	RL	A5-15
G. J. LeBaron	WHC	S6-19
J. J. Luke	WHC	H6-25
J. R. Markillie	GSSC	B1-42
E. M. Mattlin	RL	A5-15
J. E. Mecca	RL	R3-78
T. M. Michelena	Ecology	Lacey
M. R. Morton	BHI	X5-55
S. M. Price	WHC	H6-23
J. E. Rasmussen	RL	A5-15
J. R. Robertson	WHC	H6-30
F. A. Ruck III	WHC	H6-23
M. J. Stephenson	WHC	H6-30
G. T. Tebb	Ecology	B5-18
W. E. Toebe	WHC	H6-22
B. D. Williamson	WHC	B3-15
RCRA Files/GHL	WHC	H6-23

ADMINISTRATIVE RECORD: PUREX, TS-2-6 [Care of EDMC, WHC (H6-08)]

Washington State Department of Ecology Nuclear and Mixed Waste Hanford Files, P.O. Box 47600, Olympia, Washington 98504-7600

Environmental Protection Agency Region 10, Seattle, Washington 98101, Mail Stop HW-074 (Records Center)

Please send comments on distribution list to K. E. Knox, WHC (H6-23), (509) 372-3596.