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Meeting Minutes Transmittal

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

April 6, 1995
1:00 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: 6/29/95
Richard X. Gonzalez, Unit Manager, TPD, DOE-RL

Robert J. Julian Date: 6/29/95
Robert J. Julian, Unit Manager, Washington State Department of Ecology

Not Present Date:
Daniel L. Duncan, RCRA Program Manager, EPA Region 10

Gregory J. LeBaron Date: 6/29/95
Gregory J. LeBaron, Contractor Representative, WHC

Purpose: Discuss PUREX Deactivation and PUREX Storage Tunnels Permitting

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 - PUREX Deactivation Status
Attachment 6 - PUREX Storage Tunnels
Attachment 7 - PUREX Unit Managers Meeting - Waste Code Issues
Attachment 8 - Comments - PUREX Deactivation End Point Criteria

JUL 1995 RECEIVED EDMC

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Attachment 1

PUREX PLANT/STORAGE TUNNELS UNIT MANAGERS' MEETING
Federal Building, Richland, Washington
Thursday, April 6, 1995

- AGENDA -

1:00 PM - 3:30 PM INTRODUCTIONS

STATUS ITEMS

- TPA progress
- NEPA documentation for nitric acid and fuel transfer
- PUREX/UO3 transition status

TOPICS FOR DISCUSSION

- PUREX Storage Tunnels presentation
- Concerns raised by February 1995 Ecology/EPA letter
  - Clarification of the term "empty"
  - Listed waste

GENERAL TOPICS

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

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

9513359.0628

Attachment 2

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

April 6, 1995
1:00 p.m. - 3:30 p.m.

Summary of Discussion and Commitments/Agreements

STATUS ITEMS

- **TPA Progress**

  Ms. J. Robertson (WHC) inquired about the public meetings regarding the Tri-Party Agreement (TPA) revision. Mr. M. Jaraysi (Ecology) stated that comments have been received, and the responsiveness summary is being prepared.

- **NEPA Documentation for Nitric Acid and Fuel Transfer**

  Mr. R. Gonzalez (RL) reported that the Environmental Assessment (EA) for the fuel shipment was approved by the DOE review board. The EA has been issued to the Indian tribes, Ecology, and various stakeholders for review and comment. Public meetings concerning the nitric acid shipment were held last week in Portsmouth, Virginia; Baltimore, Maryland; and Newark, New Jersey. DOE has received written comments, and an appendix summarizing the comments and DOE's responses will be included in the final EA. The final EA is scheduled to be transmitted by May 1, 1995, for RL approval; if there is a finding of no significant impact, nitric acid shipments should be occurring by the end of May 1995. Mr. Gonzalez stated that the contract with British Nuclear Fuels, Limited (BNFL) for receipt of the nitric acid is being renegotiated because of delays as a result of the EA process.

- **PUREX/UO3 Transition Status**

  Mr. G. LeBaron (WHC) provided a handout regarding the PUREX/UO3 transition status (Attachment 5). Regarding the chemical product tanks in the 211A Area, Mr. LeBaron stated that the tanks were emptied some time ago. During deactivation, residuals from several tanks will be flushed to the chem sewer. Residuals from the nitric acid tank will first be sent through an elementary neutralization unit before being routed to the chem sewer, then to B Pond. Mr. LeBaron stated that RL/WHC will provide EPA with a notification and a certification that land disposal restrictions (LDRs) have been met before the nitric acid is sent out.[1]

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[1] The meeting minutes accurately reflect statements made during the meeting. However, 40 CFR 268 requirements indicate that the notification and certification may be provided after the fact. RL/WHC did, in fact, transmit these after the discharge occurred.

Regarding the fuel transfer to the K Basins, Mr. LeBaron stated that current efforts support making the transfer in August 1995, pending approval of National Environmental Policy Act (NEPA) documentation. Mr. P. Beaver (EPA) inquired about the need for approved NEPA documentation before the fuel transfer. Ms. Robertson explained that the fuel transfer is considered a new activity not covered under previously existing NEPA documentation.

Mr. LeBaron reported that Tanks D5 and E6 are empty, and the last of the plutonium solution is scheduled to be transferred to Tank Farms. He added that flushing activities are complete for K Cell, G and R Cells, and the backcycle vessels. Mr. LeBaron reported that sample results for Tank 156 (a stainless steel vessel that contained dilute nitric acid) unexpectedly revealed high chrome levels (26 ppm and 33 ppm). As a result, Tank 156 will be resampled, and Ecology and EPA will be notified when the sampling is scheduled.

Mr. LeBaron stated that the Treated Effluent Disposal Facility (TEDF) is scheduled to come on-line in May 1995, and the radiation limits imposed on material sent to TEDF may preclude operating the E-F11 concentrator. In response to an inquiry from Mr. Jaraysi, Mr. LeBaron explained that steam condensate from E-F11 will be sent through the chemical sewer to TEDF, and the condensate may exceed radiation limits at TEDF. RL/WHC are sampling the condensate.

TOPICS FOR DISCUSSION

- **PUREX Storage Tunnels Presentation**

Mr. Jaraysi introduced Mr. B. Julian (Ecology) as the new unit manager for the PUREX Storage Tunnels who will support the tunnels permitting process. Mr. P. Beaver (EPA) enquired about the permitting status of the tunnels. Mr. Jaraysi noted that a prerequisite for deactivation of a facility is termination of its mission. Mr. Jaraysi pointed out that waste would continue to be stored in the tunnels; therefore, Ecology is opposed to saying that the tunnels are being "deactivated." A Part B permit application is being processed for the continued storage operations at the tunnels.

At Mr. Jaraysi's request, Mr. LeBaron provided an overview of the PUREX Storage Tunnels (Attachment 6). Mr. LeBaron stated that current plans are to deactivate the tunnel fans and seal the storage tunnel doors. However, he acknowledged that there is an option being explored to store mixed waste from elsewhere onsite in Tunnel #2, and to leave the tunnels in an active state. Mr. LeBaron added that additional NEPA and safety documentation may be necessary for this new option for using the tunnels.

- **Concerns Raised by February 1995 Ecology/EPA Letter**

  Clarification of the Term "Empty"

  Ms. Robertson stated that RL/WHC's first concern was with regard to the use of the term "empty" as it pertains to tanks versus containers. Mr. Jaraysi confirmed that Ecology and EPA planned to issue a joint letter clarifying the issue. Mr. Jaraysi noted that the agreement reached during the Data Quality Objective (DQO) process was not reflected in the February 1995 Ecology/EPA letter. An action item was generated for Ecology/EPA to provide RL/WHC a letter clarifying their regulatory interpretation of "empty" tanks.

  Listed Waste

  Mr. M. Stephenson (WHC) distributed a handout (Attachment 7) and gave a presentation regarding listed waste concerns associated with debris in the PUREX Storage Tunnels and process effluent discharges to Cribs 216-A-5, 216-A-10 and 216-A-45. Mr. Stephenson stated that discharges to the 216-A-5 crib ceased before the effective date of regulation for mixed waste; therefore no permit is required for that crib. Based upon agreements reached during TPA negotiations held in 1994 regarding listed waste in the PUREX canyon, RL/WHC proposed that a Part A not be filed for the 216-A-45 Crib solely due to listed waste concerns, and that listed waste codes not be added to the permitting documents for the PUREX Storage Tunnels or the 216-A-10 crib. ~~listed waste concerns not be allowed to impact the permitting status of the tunnels and cribs that received waste generated from the PUREX process.~~ RL/WHC plan to request a contained-in determination from EPA regarding the F-listed codes for debris that is either in storage or will be placed in storage in the tunnels during deactivation. Mr. Jaraysi suggested that another meeting focusing solely on these issues should be arranged.

GENERAL TOPICS

- **Action Items**

  Past Action Items

  Action item 1-24-95:1, RL/WHC will provide Ecology and EPA a package which will address the issue of deviations from SW-846.

  For Ecology's information, Mr. LeBaron provided a package of procedures that WHC is using to analyze flush samples on site. This action item was closed.

  Ms. Robertson stated that a minor revision to Section 6.0 of the DQO document is necessary. The section states that analyses will be "performed using the methods described in SW-846," and the proposed revision would state that analyses will be "performed per SW-846." Ms. Robertson explained that the current text is not

strictly accurate because RL/WHC do not use methods right out of SW-846. She stated that the methods used by RL/WHC are based on SW-846 and fall within the level of variation allowed by SW-846 (e.g., in the preamble language in the Federal Register). Ms. Robertson briefly addressed the sitewide issue regarding deviations from SW-846, and she provided Mr. Jaraysi with excerpts from the Federal Register (60 FR 3089, January 1995) which specify that SW-846 is not required for all analyses done for RCRA. Ms. Robertson also provided a responsive summary document prepared by Ecology in 1993 which states that SW-846 will not be required in all circumstances. Mr. Jaraysi stated that Mr. J. Yokel (Ecology) would be making the final decision regarding deviations from SW-846, and he suggested that RL/WHC provide Mr. Yokel a package with the SW-846 references.

Mr. Beaver inquired about RL/WHC's rationale for generating procedures separate from SW-846. Mr. Jaraysi explained that RL/WHC could not always meet all of the requirements of SW-846; for instance, Hanford Site samples contain higher levels of radioactivity than can be analyzed using strict adherence to SW-846, and some samples must remain at the generation point until they are checked and, therefore, exceed the required 24-hour holding time. Mr. LeBaron noted that the differences between Hanford Site procedures and those of SW-846 may at times be as insignificant as the difference between "mix for five minutes" and "agitate thoroughly."

Action item 1-24-95:2, RL/WHC will provide a copy of the final memorandum of agreement between EM-40 and EM-60 regarding transition of UO3 from WHC to Bechtel.

This action item remained open.

Action item 3-2-95:1, RL will provide Mr. Jaraysi a draft of the PUREX Plant end point criteria document.

Mr. Jaraysi confirmed receipt of an informal transmittal of the draft document, and formal transmittal from RL/WHC will follow. Mr. Jaraysi provided a set of draft comments on the document (Attachment 8). This action item was closed.

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

Mr. Jaraysi stated that he reviewed the Part A, and he will be providing RL/WHC an approval letter. This action item was left open.

Action item 3-2-95:3, RL/WHC will include Mr. D. Duncan (EPA) via teleconference on March 16, 1995, to discuss the issues in the joint EPA/Ecology response to RL's October 28, 1994, letter.

The March 16, 1995, conference call was canceled. Mr. Duncan will be included during a teleconference scheduled for April 12, 1995,

to discuss the February Ecology/EPA letter. This action item was closed.

New Action Items

Ecology and EPA will provide a letter clarifying their regulatory interpretation of "empty" tanks.

- **Additional Discussion**

  There were no topics for discussion.

- **Scheduling of Next Meeting**

  The next PUREX Plant/Storage Tunnels Unit Managers' Meeting was scheduled for a videoconference the week of May 22, 1995.

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Attachment 3

PUREX
Unit Managers Meeting
Federal Building, Room 784B
Richland, Washington

April 6, 1995
1:00 p.m. - 2:30 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
Cindy Grant	DOH	206 4646206
Paul Beaver	EPA	376-8665
Rick Gonzalez	DOE-RL	373-9922
Felix Miera	DOE-RL	373-7589
Julie Robertson	WHC Env. Services	(509) 376-8162
Greg LeBaron	WHC	373-1792
Robert J. Julian	Ecology	736-5702
Mike Stephenson	WHC	376-3870
Moses Jaraysi	Ecology	736-3016

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Attachment 4

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

April 6, 1995
1:00 p.m. - 3:30 p.m.

Action Items

Action Item	Description
01-24-95:1	RL/WHC will provide Ecology and EPA a package which will address the issue of deviations from SW-846. ACTION: F. Ruck and R. Bhatia (WHC) **CLOSED**
01-24-95:2	RL/WHC will provide a copy of the final memorandum of agreement between EM-40 and EM-60 regarding transition of UO3 from WHC to Bechtel. ACTION: G. LeBaron (WHC) **OPEN**
03-02-95:1	RL will provide Mr. M. Jaraysi (Ecology) a draft of the PUREX Plant end point criteria document. ACTION: R. Gonzalez (RL) **CLOSED**
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) **OPEN**
03-02-95:3	RL/WHC will include Mr. D. Duncan (EPA) via teleconference on March 16, 1995, to discuss the issues in the joint EPA/Ecology response to RL's October 28, 1994, letter. ACTION: J. Robertson (WHC) **CLOSED**
04-06-95:1	Ecology and EPA will provide RL/WHC a letter clarifying their regulatory interpretation of "empty" tanks. ACTION: M. Jaraysi (Ecology) and D. Duncan (EPA) **OPEN**

9513359.0635

Attachment 5

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

April 6, 1995
1:00 p.m. - 3:30 p.m.

PUREX DEACTIVATION STATUS

#5
PUREX
4-6-95

PUREX DEACTIVATION

STATUS

9513359.0636

G.J. LeBaron
6 April '95

211A AREA TANK FLUSHING

- Tanks Have Been Emptied
  - Aluminum Nitrate
  - Ammonium Fluoride/Ammonium Nitrate
  - Nitric Acid
  - Potassium Hydroxide
- Flush Residuals In Tanks To Chemical Sewer

9513359.0637

FUEL TRANSFER TO K BASINS

Dissolver Cell Fuel Transfer:

- Fuel on A-Cell floor (4 Pieces) placed in canister
- B cell equipment removal in progress
- Dissolver cell fuel transfer scheduled for 8/8/95
    - Dependent on completion of NEPA documentation

9513359.0638

D5/E6 ACTIVITIES

- Emptied Tks D5 & E6
  - Planning Flushes
- Two batches left to transfer to Tank Farms

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D5/E6 ACTIVITIES

- Emptied Tks D5 & E6
    - Planning Flushes
- Two batches left to transfer to Tank Farms

9513359.0640

CANYON FLUSHING ACTIVITIES

- Completed
  (K Cell, G&R Cell [Part A, Part B], Backcycle Vessels)

- Awaiting RCRA sample results
  (Tk-156, Tk-G7, Cladding Waste Vessels, L-Cell)

- Currently Flushing
  (Head End)

- Future Flushing
  (U Cell vessels, Tk-M1, Tk-U1/U2, Tk-U3/U4, D5/E6, F13/F15/F16 vessels and F10/E-F11/F12/F18 vessels)

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E-F11

- Accomplished a WVR of 132,000 gallons thus far
- Make modifications to route condensate to chemical sewer from Tk-P5
- TEDF may preclude operation of E-F11
  - Estimated 420,000 gallons of water left

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N CELL

- Small equipment removal has been completed in all wet gloveboxes
    - NDA and isolate wet gloveboxes
- Equipment disassembly in the dry gloveboxes has begun

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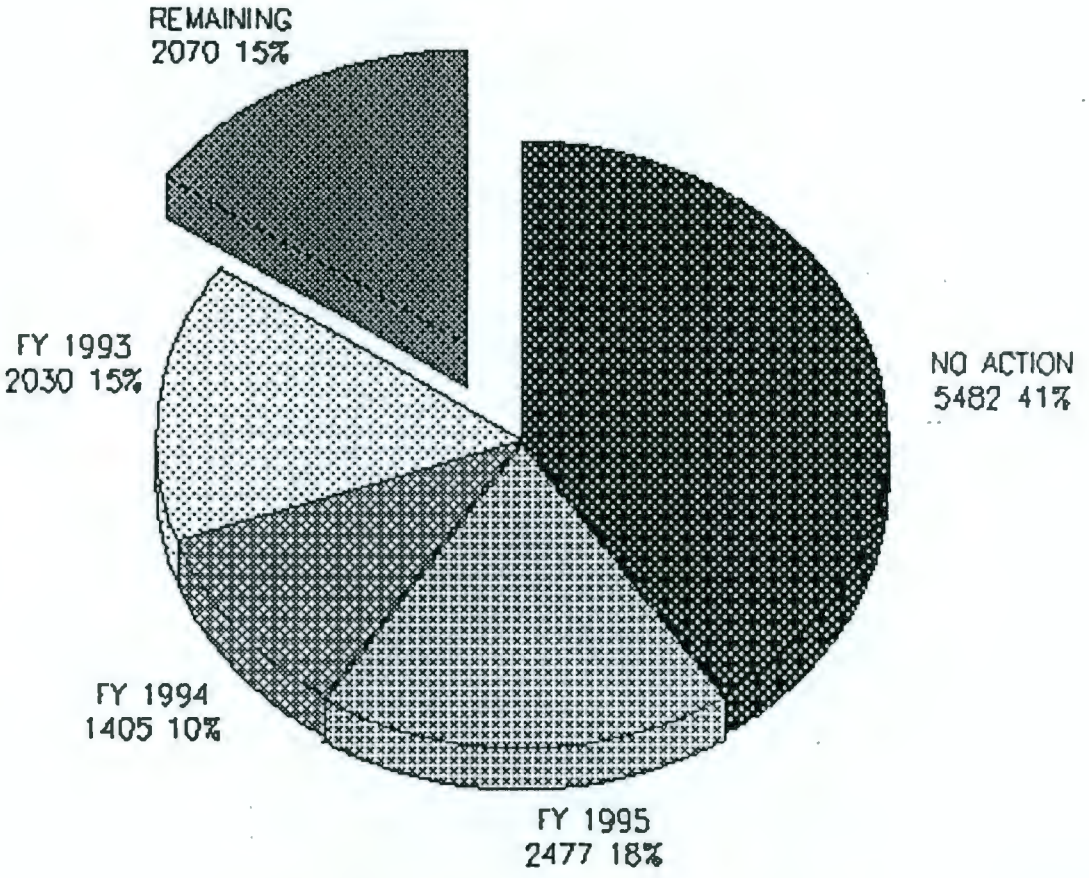
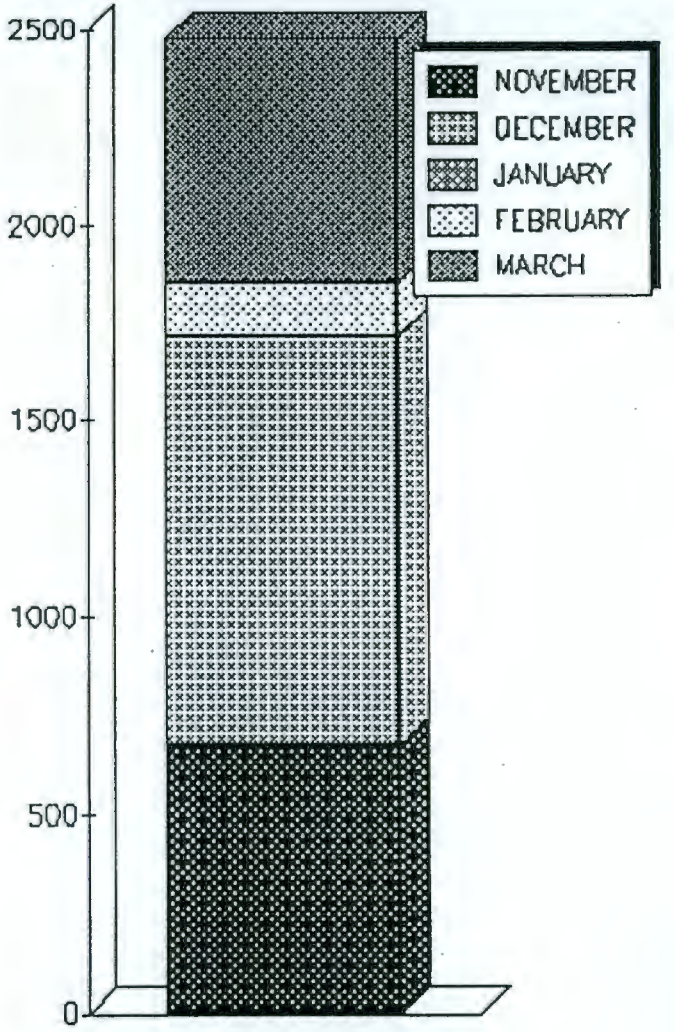
PUREX INSTRUMENT DEACTIVATION



Total Instrument Deactivation



Deactivation
FY 1995

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ELECTRICAL

- Design requirements being finalized
- Decided to install new sub-unit based on cost estimates

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HVAC

- Value Engineering Study held last week
  - Final Consolidation Criteria Being Planned
    - White Room
    - M Cell Pipe Chase
    - RR Tunnel
    - Pre-filters/preheat
    - Final Filtration
    - Others

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Attachment 6

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

April 6, 1995
1:00 p.m. - 3:30 p.m.

PUREX STORAGE TUNNELS

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PUREX STORAGE

TUNNELS

G. J. LeBaron
6 April '95

OVERVIEW

- Tunnel Configuration
- Tunnel Deactivation
- Tunnel Integrity

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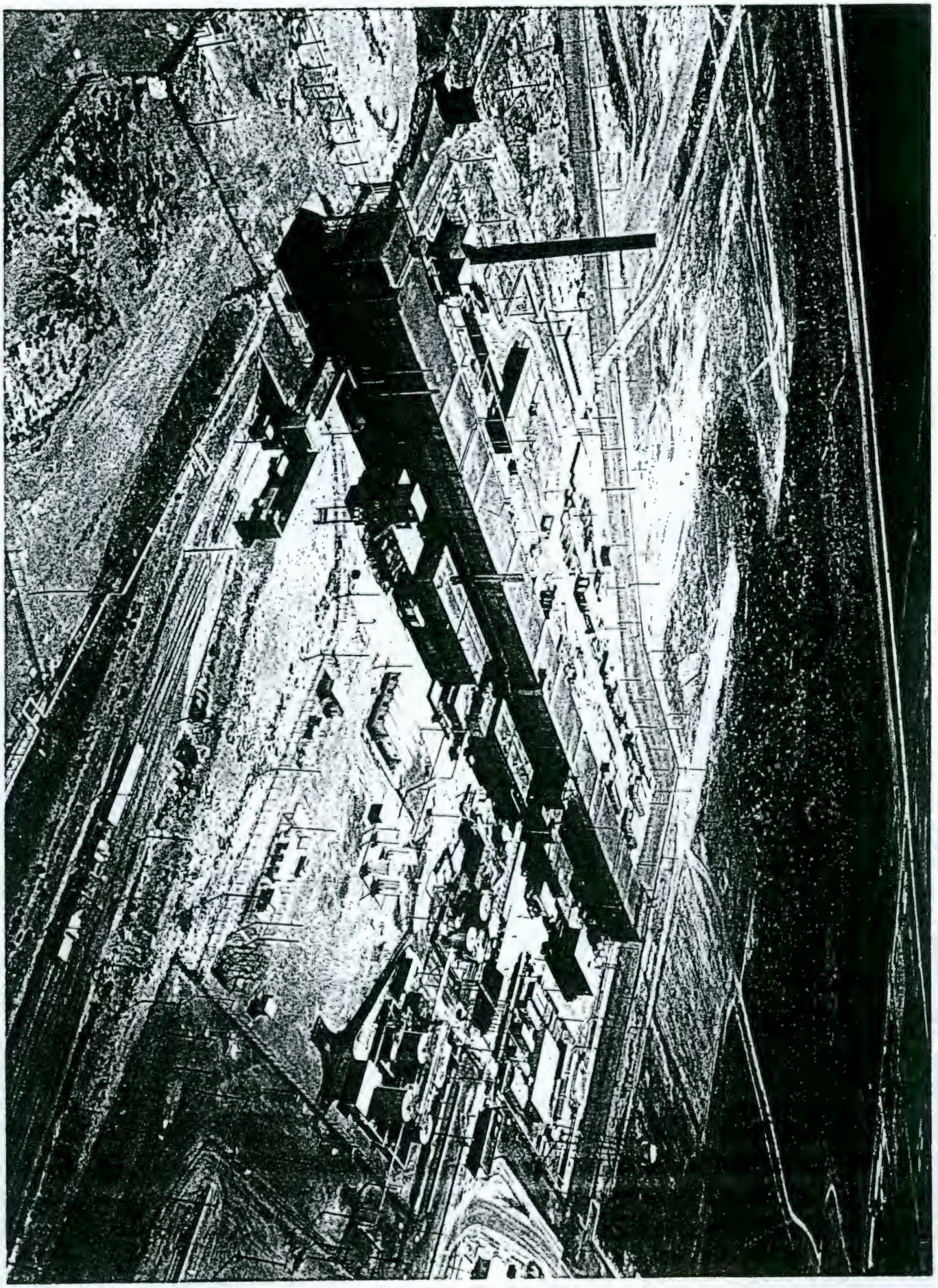

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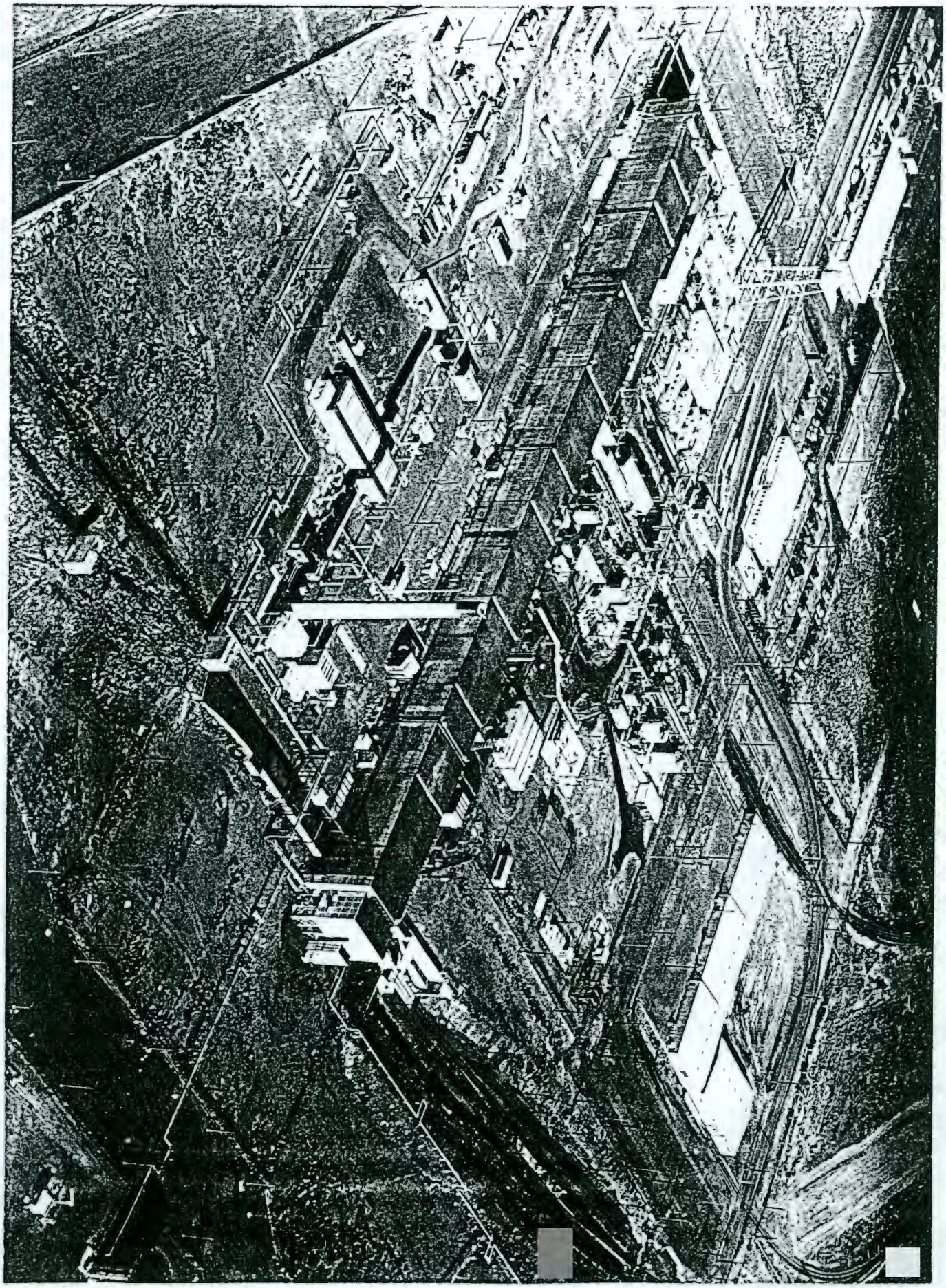

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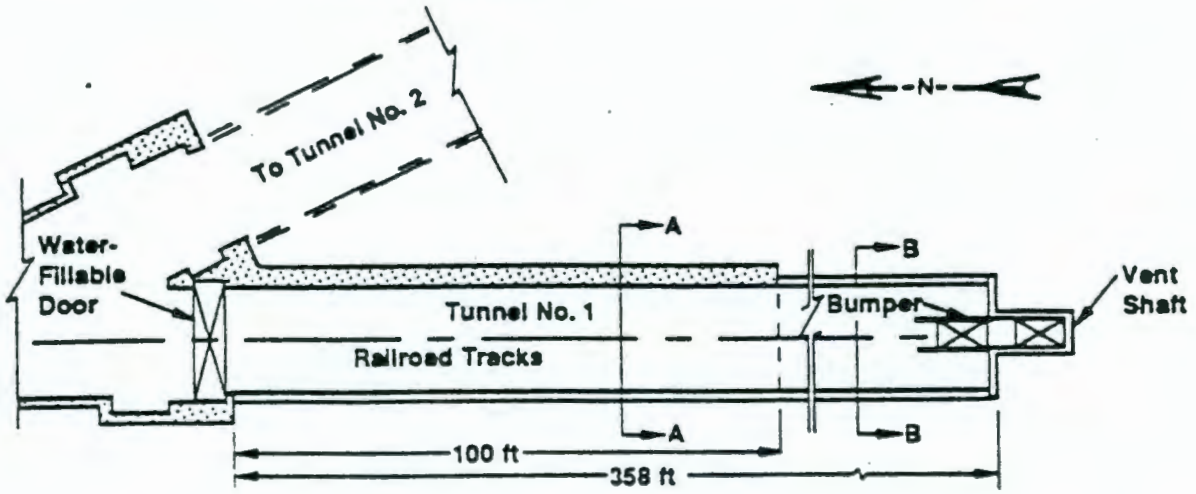
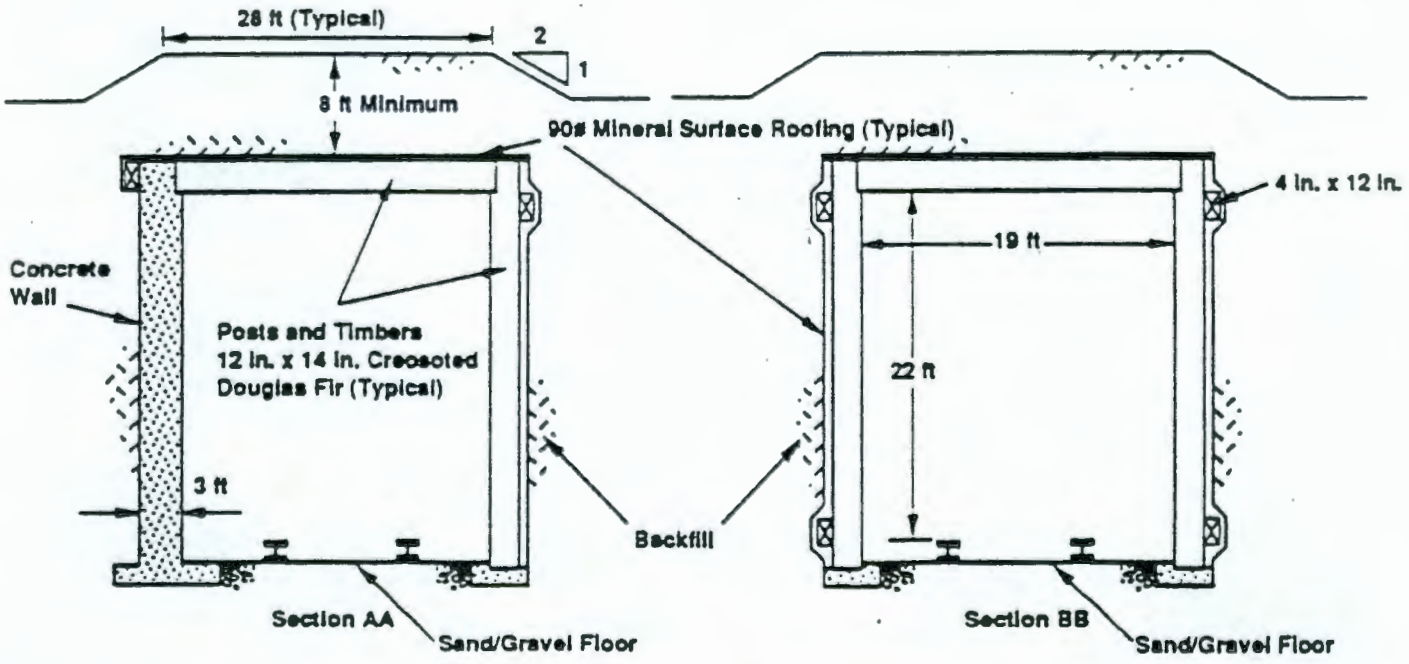
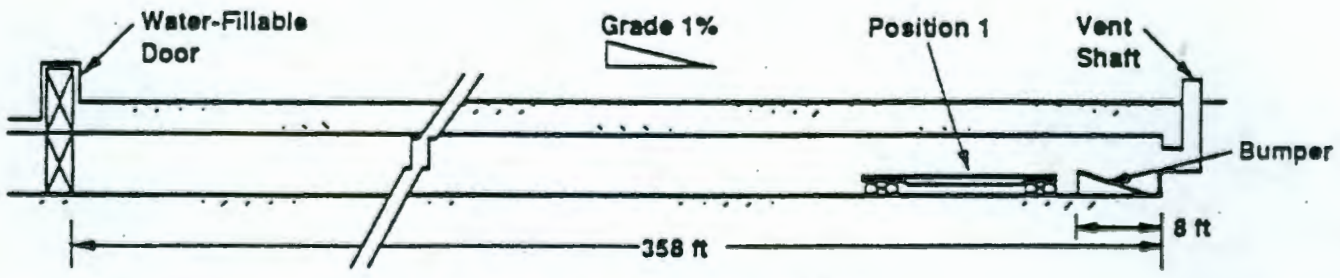


Tunnel No. 1 - Plan View



PUREX Tunnel No. 1 - Section Views



PUREX Tunnel No. 1 - Elevation View

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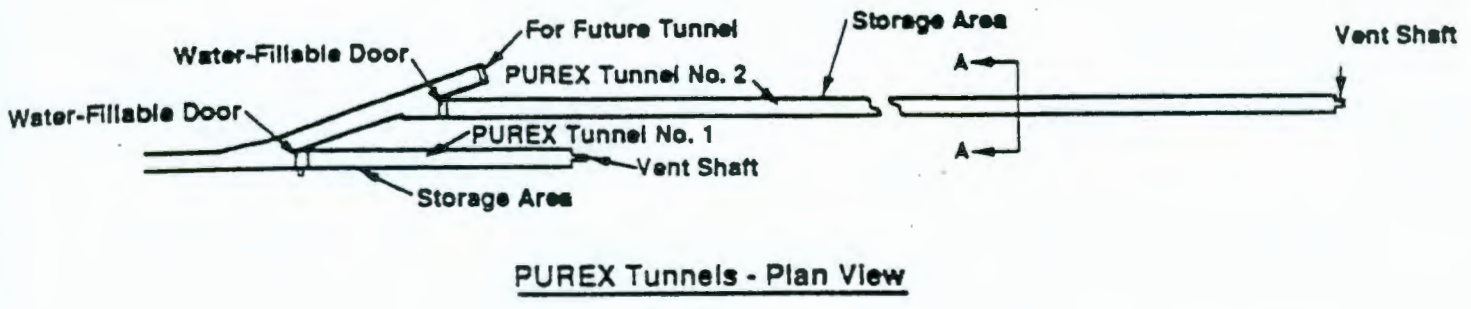
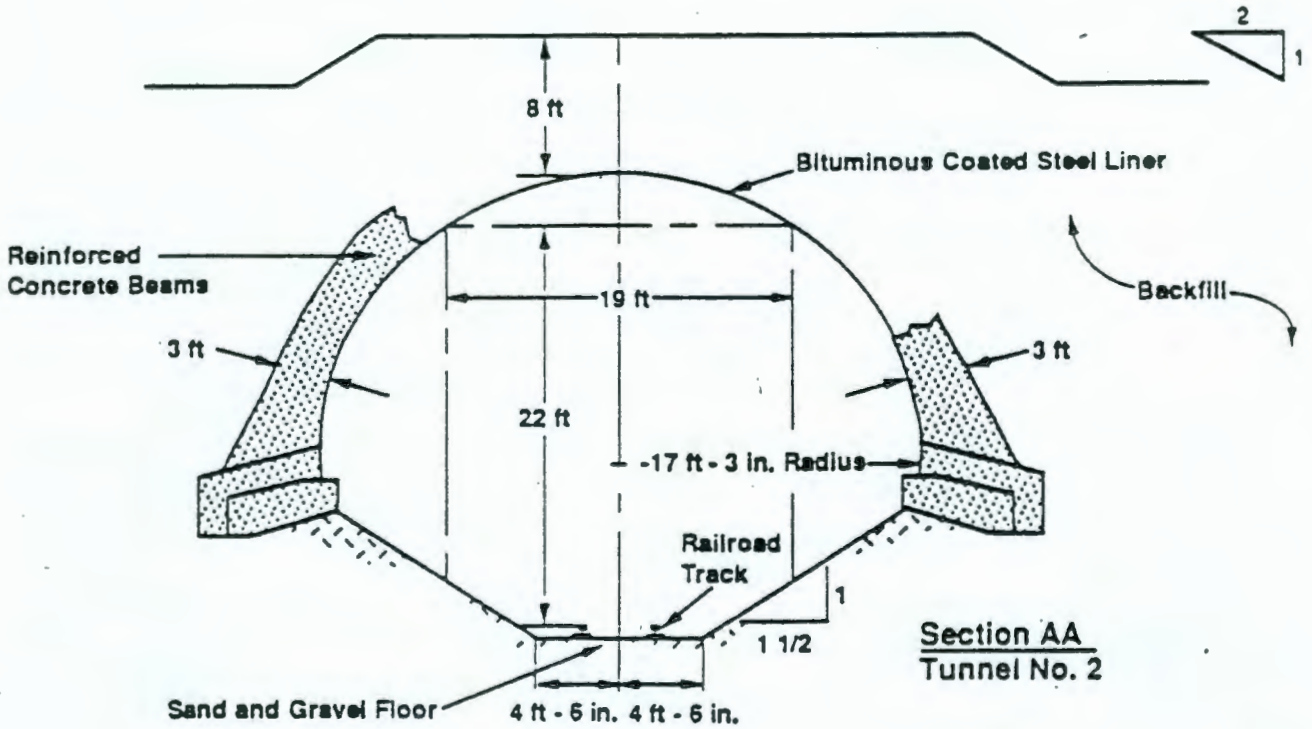
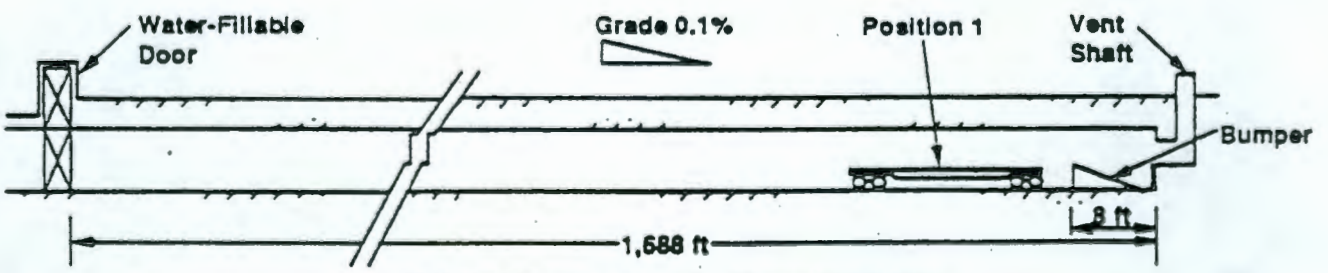


PUREX Tunnels - Plan View





PUREX Tunnel No. 2 - Elevation View

78910032.1

Figure 2-7. The PUREX Storage Tunnel Number 2.

STORAGE TUNNEL DEACTIVATION ACTIVITIES

- Deactivate tunnel fan and blank
- Seal storage tunnel door
- Tack-Weld tunnel door shut, install a blank and seal
- Install louvers in overhead door and seal door
- Seal sample gallery/tunnel connecting duct
- Issue tunnel Part B as Part of Hanford Site Permit

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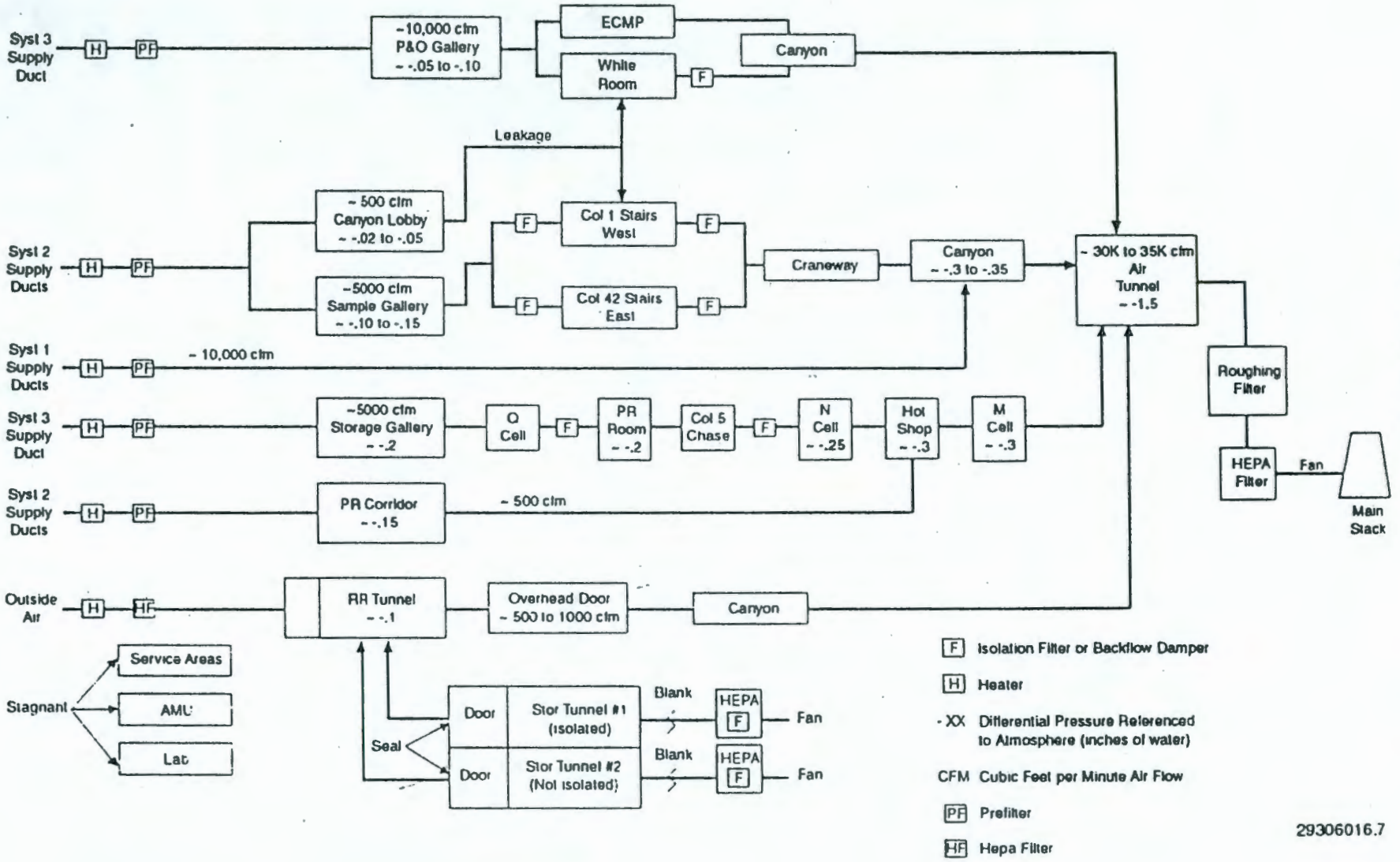

Figure G-9 PUREX Ventilation Consolidation.

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CONSIDERATIONS IN USING PUREX FOR WASTE STORAGE

- Not in plans
  - Ventilation
  - Electrical
  - Decontamination
- Permitting
- Documentation
  - Radiation levels
  - NEPA
  - Safety
- Cost and schedule

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ADDITIONAL CONSIDERATIONS IN USING PUREX FOR WASTE STORAGE AFTER DEACTIVATION

- Program
  - Turn over to EM-40

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RECOMMENDATION

- Determine if tunnels should be used for Hanford Site Waste
- Determine what waste and time interval for use
- Modify program planning, including costs and schedules, accordingly

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TUNNEL

INTEGRITY

9513359.0659

PUREX STORAGE TUNNEL #1
STRUCTURAL INTEGRITY

EVALUATION	METHOD	RESULTS
1971 WOOD SAMPLING	FOUR 3/16 INCH DIAMETER BORE SAMPLES OBTAINED FROM ROOF TIMBERS FOR DETERMINATION OF EFFECTS OF DECAY BY RADIATION AND/OR INSECTS	NO NUMERICAL RESULTS OBTAINED; VISUAL EXAMINATION OF SAMPLES INDICATED SATISFACTORY CONDITION AFTER 15 YEARS
1978 EVALUATION OF TUNNEL ENVIRONMENT	NO STRUCTURAL DATA OBTAINED, ONLY ENVIRONMENTAL DATA	TEMPERATURE RECORDED @ 64°F, HUMIDITY @ 7%, WITH LITTLE SEASONAL CHANGE ANTICIPATED
1980 CORE SAMPLING (SILVAN STUDY)	CORE SAMPLES 4-1/8 INCHES IN DIAMETER BY 14 INCHES LONG OBTAINED FROM ROOF TIMBERS FOR STATIC BENDING TESTS	NUMERICAL TEST RESULTS SHOWED AFTER 24 YEARS TIMBERS WERE WITHIN STANDARDS FOR PRESENT DAY NEW WOOD @ 65.4% OF ORIGINAL STRENGTH
LATA STUDY (MAY 1991)	REVIEW OF PAST STUDIES TO DETERMINE STRUCTURAL INTEGRITY AND PREDICTION OF FUTURE TUNNEL LIFE	RESULTS INDICATED THAT THE TIMBERS ARE STRUCTURALLY SOUND; CONSERVATIVE ESTIMATION PREDICTED THAT THE TIMBERS WILL BE 60% OF ORIGINAL STRENGTH IN 2001

9513359.0660

PUREX STORAGE TUNNEL #2
STRUCTURAL INTEGRITY

EVALUATION	METHOD	RESULTS
NO STRUCTURAL INTEGRITY EVALUATION HAS BEEN PERFORMED FOR TUNNEL #2	NONE	TUNNEL #2 IS CONSTRUCTED OF STEEL MEMBERS WITH TRANSVERSE REINFORCED CONCRETE RIBS, THEREFORE AN EVALUATION OF DECAY DUE TO RADIATION OR INSECT ATTACT IS NOT NECESSARY

9513359.0661

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Attachment 7

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

April 6, 1995
1:00 p.m. - 3:30 p.m.

PUREX UNIT MANAGERS MEETING - WASTE CODE ISSUES

#7.
PUREX
4-6-95

PUREX Unit Managers Meeting

April 6, 1995

9513359.0663

M. J. Stephenson
Westinghouse Hanford Company

Introduction

- Small quantities of F-listed waste were introduced from the PUREX laboratory into the PUREX Process.
- Listed waste constituents included acetone, xylene, n-butyl alcohol and toluene.
- Transferred to steam heated concentrators.
- Concentrate sent back into PUREX process.
- Gaseous phase condensed and routed to 3 cribs.

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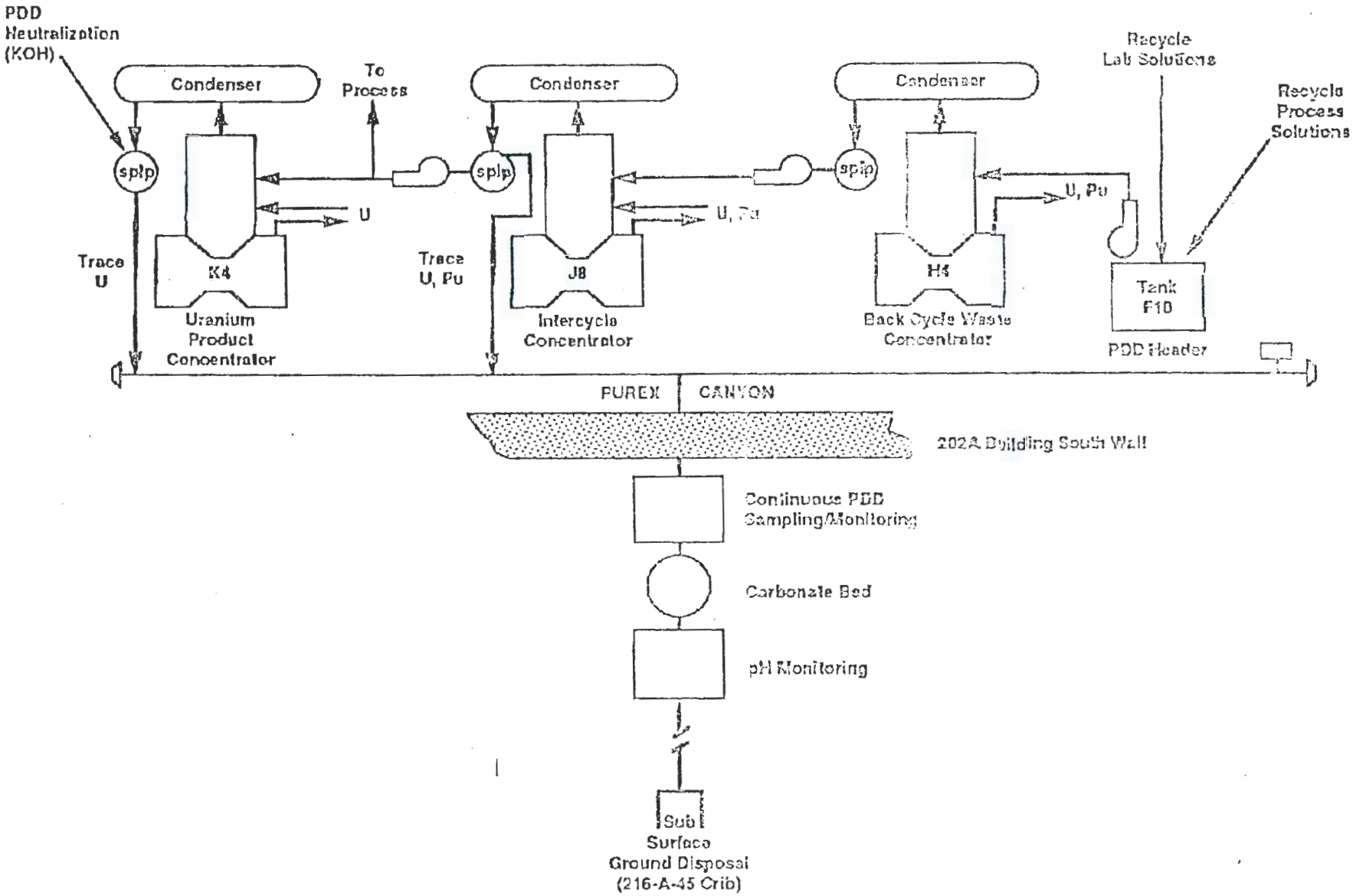
PDD System Overview

Since February 23, 1987



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Existing Agreements

- TPA agreements regarding laboratory listed waste at PUREX:
  - Tanks or vessels won't be added to the PUREX Part A solely because of listed waste concerns;
  - Listed waste codes won't be added to the PUREX Part A;
  - The PUREX system has been sufficiently flushed and decontaminated since the last discharge of laboratory listed waste into the system so that process solutions should not carry F-codes.
- Decisions are based on an environmentally-safe, common-sense, cost-effective point of view.

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Open Issues

- Two issues regarding listed waste require clarification and resolution
  - Debris in storage in the tunnels, now and in the future;
  - Wastewater discharge to the cribs.

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PUREX Storage Tunnels

- Strict interpretation of mixture and derived from rule could require some debris from the PUREX canyon to carry F-listed codes.
- Debris is currently in the PUREX Storage Tunnels.
- Debris is being and will continue to be generated throughout transition activities.

9513359.0668

PUREX Tunnels (continued)

- A determination from EPA will be sought for debris from the canyon that
  - is in the tunnels; and
  - will be generated throughout transition.
- A determination can be made by EPA that the debris is no longer contaminated with a listed waste [40 CFR 261.3(f), 57 FR 37225, August 18, 1992].
- The debris will still need to be evaluated for characteristics.

9513359.0669

PUREX Storage Tunnels (continued)

- WHC/RL believe that the available information and previous decisions regarding listed waste provide justification for EPA to make a determination that the debris is no longer contaminated with a listed waste.

- Consistent with previous agreements, it is recommended that the tunnels Part A and B Permits are not updated to include F-listed codes for debris which has been or will be placed into storage.

9513359.0670

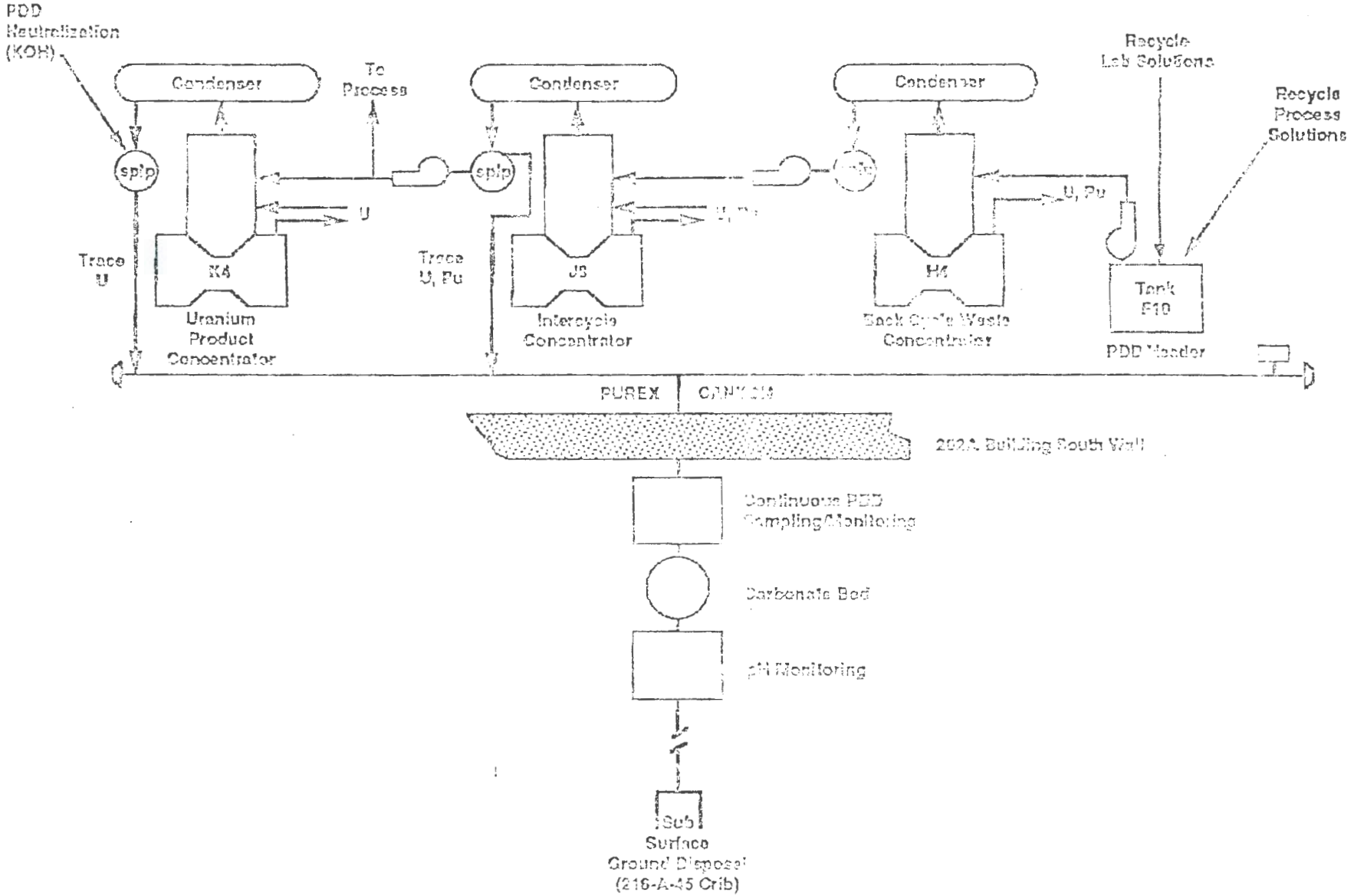
Cribs

- Some portion of recycled aqueous condensate was discharged to the soil via three cribs within the 200-P0-2 Operable Unit.
  - 216-A-5 Crib
  - 216-A-10 Crib
  - 216-A-45 Crib

9513359.0671

PDD System Overview

Since February 28, 1987



96-WSD-067

216-A-5 Crib

- Has no Part A Permit.
- Discharge ceased in 1967.
- Disposal ceased prior to effective date of regulation for mixed waste (November 23, 1987); therefore, no permit is required.
  [51 FR 24504, July 3, 1986 and 52 FR 35556, November 23, 1987]
- The Waste Information Data System (WIDS) will be updated.

9513359.0673

216-A-10 Crib

- Has a Part A Permit with D002.
- Scheduled for closure.
- Discharge ceased in March, 1987.
- Disposal ceased prior to the effective date of regulation for mixed waste (November 23, 1987); therefore, the permit will not be updated to include F-listed codes.
  [51 FR 24504, July 3, 1986 and 52 FR 35556, November 23, 1987]
- The Waste Information Data System (WIDS) will be updated.

9513359.0674

216-A-45 Crib

- Has no Part A Permit.
- Discharge ceased in 1989.
- The Waste Information Data System (WIDS) will be updated.
- Consistent with agreements for tanks, it is recommended not to file a Part A solely for listed waste concerns.

9513359.0675

Conclusion/Recommendation

- Two issues:
  - Debris in tunnels
  - Discharge to cribs.

9513359.0676

Conclusion/Recommendation (continued)

- The tunnels Part B should not be updated to include F-listed codes.
- A determination from EPA will be sought for debris from the canyon that
  - is in the tunnels; and
  - will be generated throughout transition.
- A determination can be made by EPA that the debris is no longer contaminated with a listed waste [40 CFR 261.3(f), 57 FR 37225, August 18, 1992].

9513359.0677

Conclusion/Recommendation (continued)

- A Part A Permit is not required for the 216-A-5 crib.
- The Part A Permit for the 216-A-10 crib is not required to be updated for F-listed codes.
- A Part A Permit should not be submitted for the 216-A-45 crib solely for listed waste concerns.

9513359.0678

Conclusion/Recommendation (continued)

- WHC/RL believe these recommendations are:
  - Consistent with prior agreements reached regarding listed waste at PUREX; and
  - Based on an environmentally safe, common sense, cost effective point of view.

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9513359.0680

Attachment 8

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

April 6, 1995
1:00 p.m. - 3:30 p.m.

COMMENTS
PUREX DEACTIVATION END POINT CRITERIA

9513359.0681

DRAFT

DRAFT

COMMENTS

PUREX DEACTIVATION END POINT CRITERIA

WHC-SD-TPP-XXX

1. Page 4, first bullet states, "... end point decision should be driven by, ... objectives, not by feasibility or capability.". while on page 4, the fifth bullet states, "To be workable, end points must be:

- feasible and practical." The two statements should agree , not lead the reader to the idea that you do not start out trying to be feasible while forming end points but then ensure the end points must be feasible.

2. Page 4, the sixth bullet from the top states, "... should not be driven by D&D presumptions." while in V. on page 5 states "Every end point is driven ...which will then form the basic criteria for the end points. ... they are:

- Facilitating the ultimate D&D Work" The two statements do not agree.

3. Need a definition of "Task Areas".

4. Page 20. "Identify these locations in the turnover package.." should be "Document and Label" not "Contamination".

5. Page 23, "Furnish lighting ... turnover package." should be "Document and Label" not "Monitor and Control".

6. Page 32, "Plug floor drains." and "Tape/seal ... Tk-113)." should be "Monitor and Control" not "Isolate and Contain".

7. Page 53, "Seal gaps ... and Seal (plug) ..." should be "Isolate and Contain" not "Contamination".

8. Page 56 and 70, how is "Remove cages ... " an action for "Waste"?

9. Page 60, "Plug floor drains." should be "Isolate and Contain" not "Monitor and Control".

10. Page 72, "Seal penetrations ... and Seal (plug) ..." should be "Isolate and Contain" not "Contamination".

11. Page 99, change to read "Empty all bays of excess waste material.".

12. Page 125, "Provide space lighting." should be ""Refurbish or Install" not "Isolate and Contain".

13. Page 140, "Remove water ..." should be "Contamination" or "Waste" not "Hazards".

14. Page 142, "Provide space lighting." should be "Refurbish or Install' not "Monitor and Control".

15. Page 170, "Isolate open ..." should be "Isolate and Contain" not "Contamination".

16. Page 171, "provide space lighting." should be ""Refurbish or Install" not "Monitor and Control" and "Remove doors ..." should be "Refurbish or Install' not "Monitor and Control".

17. Page 191, "Include survey ..." should be "Document and Label" not "Contamination".

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18. Page 201. "Include roof studies ..." should be "Document and Label" not "Isolate and Contain".

19. Page 210, how does "Remove monitoring CAMs." mitigate "Hazards"?

20. Pages 211 and 212, "Cap stack 296-A-14." should be "Isolate and Contain" not "Contamination".

22. Pages 213, 218, 219, 220, and 221, what are "PUREX books? If they are real books, then why not "Document and Label" instead of "Refurbish or Install".

23. Page 229, "Include administrative controls in the turnover package" and "Identify electrical supply in the turnover package.." should be "Document and Label" not "Hazards".

24. Page 232, "Identify accumulation ..." should be "Document and Label" not "Waste"

25. Page 234, "Provide lighting ..." should be "Refurbish or Install" and "Define system ..." should be "Document and Label" not "Monitor and Control".

26. Page 238, "Blank supply ...", "Blank U-Cell...", and "Blank R-Cell..." should be "Isolate and Contain" not "Contamination".

27. Page 260, "Seal doors." should be "Isolate and Contain" not "Contamination".

27. Page 264, "Seal doors ..." and "Seal exterior ..." should be "Isolate and Contain" not "Contamination".

28. Page 280, "Include administrative controls in the turnover package" should be "Document and Label" not "Hazards".

29. Page 305, "isolate vacuum..." should be be "Isolate and Contain" not "Contamination".

30. Pages 308 316, 343, 352, 374, 383, and 400, how does "Remove monitoring CAMs." mitigate "Hazards"?

31. Page 313, add "Verify chemical addition lines are drained.".

32. Page 317, how does "Document zirconium ..." mitigate "Hazards"?

33. Page 327, how does "Drain water." mitigate "Hazards"? If it is radioactive, then it should be under "Contamination".

34. Page 337, "Isolate water add to Tk-U8." makes no sense.

35. Page 342, "Fix/isolate radiation contamination in exhaust ducting." and "seal the open face of hoods." should be "Isolate and Contain" not "Contamination".

36. Page 357, how does "Remove monitoring CAMs." mitigate "Document and Label".

37. Page 359, "remove titanium ..." should be "Isolate and Contain" not "Contamination".

38. Page 388, "Isolate sanitary ..." should be "Isolate and Contain" not "Hazards".

39. Page 398, "Isolate raw water ... south ..." and "Isolate raw water ... north ..." should be "Isolate and Contain" not "Hazards".

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40. Page 399, "Seal glove ..." should be "Isolate and Contain" not "Contamination".

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