

DOE/RL-90-24

Revision 4

UC-630

Hanford Facility Dangerous Waste Permit Application, PUREX Storage Tunnels

Date Published
April 1997



**United States
Department of Energy**

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Approved for Public Release

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1 HANFORD FACILITY DANGEROUS WASTE PERMIT APPLICATION,
2 PUREX STORAGE TUNNELS
3
4
5 FOREWORD
6
7

8 The *Hanford Facility Dangerous Waste Permit Application* is considered to
9 be a single application organized into a General Information Portion (document
10 number DOE/RL-91-28) and a Unit-Specific Portion. The scope of the
11 Unit-Specific Portion is limited to Part B permit application documentation
12 submitted for individual, 'operating' treatment, storage, and/or disposal
13 units, such as the PUREX Storage Tunnels (this document, DOE/RL-90-24).
14

15 Both the General Information and Unit-Specific portions of the *Hanford*
16 *Facility Dangerous Waste Permit Application* address the content of the Part B
17 permit application guidance prepared by the Washington State Department of
18 Ecology (Ecology 1996) and the U.S. Environmental Protection Agency
19 (40 Code of Federal Regulations 270), with additional information needs
20 defined by the *Hazardous and Solid Waste Amendments* and revisions of
21 Washington Administrative Code 173-303. For ease of reference, the Washington
22 State Department of Ecology alpha-numeric section identifiers from the permit
23 application guidance documentation (Ecology 1996) follow, in brackets, the
24 chapter headings and subheadings. A checklist indicating where information is
25 contained in the PUREX Storage Tunnels permit application documentation, in
26 relation to the Washington State Department of Ecology guidance, is located in
27 the Contents Section.
28

29 Documentation contained in the General Information Portion is broader in
30 nature and could be used by multiple treatment, storage, and/or disposal units
31 (e.g., the glossary provided in the General Information Portion). Wherever
32 appropriate, the PUREX Storage Tunnels permit application documentation makes
33 cross-reference to the General Information Portion, rather than duplicating
34 text.
35

36 Information provided in this PUREX Storage Tunnels permit application
37 documentation is current as of April 1997.
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5 METRIC CONVERSION CHART
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89
10 The following conversion chart is provided to the reader as a tool to aid
11 in conversion.
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Into metric units

Out of metric units

| If you know | Multiply by | To get | If you know | Multiply by | To get |
|----------------------|-------------------------------------|--------------------|--------------------|---------------------------------|---------------|
| Length | | | | | |
| inches | 25.40 | millimeters | millimeters | 0.0393 | inches |
| inches | 2.54 | centimeters | centimeters | 0.393 | inches |
| feet | 0.3048 | meters | meters | 3.2808 | feet |
| yards | 0.914 | meters | meters | 1.09 | yards |
| miles | 1.609 | kilometers | kilometers | 0.62 | miles |
| Area | | | | | |
| square inches | 6.4516 | square centimeters | square centimeters | 0.155 | square inches |
| square feet | 0.092 | square meters | square meters | 10.7639 | square feet |
| square yards | 0.836 | square meters | square meters | 1.20 | square yards |
| square miles | 2.59 | square kilometers | square kilometers | 0.39 | square miles |
| acres | 0.404 | hectares | hectares | 2.471 | acres |
| Mass (weight) | | | | | |
| ounces | 28.35 | grams | grams | 0.0352 | ounces |
| pounds | 0.453 | kilograms | kilograms | 2.2046 | pounds |
| short ton | 0.907 | metric ton | metric ton | 1.10 | short ton |
| Volume | | | | | |
| fluid ounces | 29.57 | milliliters | milliliters | 0.03 | fluid ounces |
| quarts | 0.95 | liters | liters | 1.057 | quarts |
| gallons | 3.79 | liters | liters | 0.26 | gallons |
| cubic feet | 0.03 | cubic meters | cubic meters | 35.3147 | cubic feet |
| cubic yards | 0.76 | cubic meters | cubic meters | 1.308 | cubic yards |
| Temperature | | | | | |
| Fahrenheit | subtract 32 then multiply by 5/9ths | Celsius | Celsius | multiply by 9/5ths, then add 32 | Fahrenheit |

Source: *Engineering Unit Conversions*, M. R. Lindeburg, PE., Second Ed., 1990, Professional Publications, Inc., Belmont, California.

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Application Checklist

Complete this checklist by providing the facility name and indicating where the listed material has been placed in the application. This is particularly important when the application does not closely follow the outline of the checklist and guidance.

Include the completed checklist with the Dangerous Waste Permit application.

Facility name PUREX Storage Tunnels (DOE/RL-90-24), Rev. 4

Date Application Received _____

| State of Washington Part B Permit Application Review Checklist for Treatment and Storage in Tanks and Containers | | |
|---|-----------------------|-------------------------|
| | Technically Adequate? | Location in Application |
| A. Part A Form | | Chapter 1.0 |
| B. Facility Description and General Provisions | | Chapter 2.0 |
| B-1 General Description | | 2.1 |
| B-1(a) Facility Description | | 2.1 |
| B-1(b) Construction Schedule | | Not Applicable |
| B-2 Topographic Map | | 2.2 |
| B-2a General Requirements | | 2.2 |
| B-2b Additional Requirements for Land Disposal Facilities | Not Applicable | Not Applicable |
| B-3 Seismic Consideration | | Not Applicable |
| B-4 Traffic Information | | 2.3 |
| C. Waste Analysis | | Chapter 3.0 |
| C-1 Chemical, Biological and Physical Analyses | | 3.1 |
| C-1a Waste In Piles | Not Applicable | Not Applicable |
| C-1b Landfilled Wastes | | |
| C-1c Wastes Incinerated and Wastes Used in Performance Tests | | |
| C-2 Waste Analysis Plan | | 3.2 and Appendix 3A |

| | | Technically Adequate? | Location in Application |
|---------|---|-----------------------|-------------------------|
| C-2a | Detailed Chemical, Physical, and/or Biological Analysis | | Appendix 3A |
| C-2a(1) | Parameters and Rationale | | Appendix 3A |
| C-2a(2) | Analytical Methods | | Appendix 3A |
| C-2a(3) | Generator-Supplied Analyses | | Appendix 3A |
| C-2b | Additional Requirements for Wastes Generated Off-site | | Appendix 3A |
| C-2b(1) | Parameters and Rationale to Confirm Identity of Off-site Waste | | Appendix 3A |
| C-2b(2) | Analytical Methods to Confirm Identity of Off-site Waste | | Appendix 3A |
| C-2b(3) | Representative Sampling of Incoming Off-site Wastes | | Appendix 3A |
| C-2c | Methods for Collecting Samples for Detailed and Confirming Analyses | | Appendix 3A |
| C-2d | Frequency of Analyses | | Appendix 3A |
| C-3 | Manifest System | | Appendix 3A |
| C-3a | Procedures for Receiving Shipments | | Appendix 3A |
| C-3b | Response to Significant Discrepancies | | Appendix 3A |
| C-3c | Provisions for Non-acceptance of Shipment | | Appendix 3A |
| C-3c(1) | Non-acceptance of Undamaged Shipment | | Appendix 3A |
| C-3c(2) | Activation of Contingency Plan for Damaged Shipment | | Appendix 3A |
| C-4 | Tracking System | | 3.3 |

| | | Technically Adequate? | Location in Application |
|-------------------------------|---|-----------------------|-------------------------|
| D. Process Information | | | Chapter 4.0 |
| D-1 | Containers | | 4.2 |
| D-1a | Description of Containers | | 4.2 |
| D-1b | Container Management Practices | | 4.2 |
| D-1c | Container Labelling | | 4.2 |
| D-1d | Containment Requirements for Storing Containers | | 4.2 |
| D-1d(1) | Secondary Containment System Design | | 4.2 |
| D-1d(1)(a) | System Design | | 4.2 |
| D-1d(1)(b) | Structural Integrity of Base | | 4.2 |
| D-1d(1)(c) | Containment System Capacity | | 4.2 |
| D-1d(1)(d) | Control of Run-on | | 4.2 |
| D-1d(2) | Removal of Liquids from Containment System | | 4.2 |
| D-1e | Demonstration that Containment Is Not Required Because Containers Do Not Contain Free Liquids, Wastes That Exhibit Ignitability or Reactivity, or Wastes Designated F020 - 023, F026, or F027 | | 4.2 |
| D-1f | Prevention of Reaction of Ignitable, Reactive, and Incompatible Wastes in Containers | | 4.2 |
| D-1f(1) | Management of Certain Reactive Wastes in Containers | | 4.2 |
| D-1f(2) | Management of Ignitable and Certain Other Reactive Wastes in Containers | | 4.2 |

| | | Technically Adequate? | Location in Application |
|------------|--|-----------------------|-------------------------|
| D-1f(3) | Design of Areas to Manage Incompatible Wastes | | 4.2 |
| D-2 | Tank Systems | | Not Applicable |
| D-2a | Design, Installation and Assessment of Tanks Systems | | Not Applicable |
| D-2a(1) | Design Requirements | | Not Applicable |
| D-2a(2) | Integrity Assessments | | Not Applicable |
| D-2a(3) | Additional Requirements for Existing Tanks | | Not Applicable |
| D-2a(4) | Additional Requirements for New Tanks | | Not Applicable |
| D-2a(5) | Additional Requirements for New On-ground or Underground Tanks | | Not Applicable |
| D-2b | Secondary Containment and Release Detection for Tank Systems | | Not Applicable |
| D-2b(1) | Requirements for All Tank Systems | | Not Applicable |
| D-2b(2) | Additional Requirements for Specific Types of Systems | | Not Applicable |
| D-2b(2)(a) | Vault Systems | | Not Applicable |
| D-2b(2)(b) | Double-walled Tanks | | Not Applicable |
| D-2b(2)(c) | Ancillary Equipment | | Not Applicable |
| D-2c | Variances from Secondary Containment Requirements | | Not Applicable |
| D-2d | Tank Management Practices | | Not Applicable |
| D-2e | Labels or Signs | | Not Applicable |

| | | Technically Adequate? | Location in Application |
|------------|---|-----------------------|-------------------------|
| D-2f | Air Emissions | | Not Applicable |
| D-2g | Management of Ignitable or Reactive Wastes in Tank Systems | | Not Applicable |
| D-2h | Management of Incompatible Wastes in Tank Systems | | Not Applicable |
| D-3 | Waste Piles | Not Applicable | Not Applicable |
| D-4 | Surface Impoundments | | |
| D-5 | Incinerators | | |
| D-6 | Landfills | | |
| D-7 | Land Treatment | | |
| D-8 | Air Emissions Control | | Not Applicable |
| D-8a | Process Vents | | Not Applicable |
| D-8a(1) | Applicability of Subpart AA Standards | | Not Applicable |
| D-8a(1)(a) | Process Vents Subject to Subpart AA Standards | | Not Applicable |
| D-8a(1)(b) | Process Vents Not Subject to Subpart AA Standards | | Not Applicable |
| D-8a(1)(c) | Re-evaluating Applicability of Subpart AA Standards | | Not Applicable |
| D-8a(2) | Process Vents - Demonstrating Compliance | | Not Applicable |
| D-8a(2)(a) | The Basis for Meeting Limits/Reductions | | Not Applicable |
| D-8a(2)(b) | Demonstrating Compliance via Selected Method | | Not Applicable |
| D-8a(2)(c) | Design Information and Operating Parameters for Closed Vent Systems and Control Devices | | Not Applicable |
| D-8a(2)(d) | Re-evaluating Compliance with Subpart AA Standards | | Not Applicable |
| D-8b | Equipment Leaks | | Not Applicable |

| | | Technically Adequate? | Location in Application |
|------------|--|-----------------------|-------------------------------|
| D-8b(1) | Applicability of Subpart BB Standards | | Not Applicable |
| D-8b(1)(a) | Equipment Subject to Subpart BB | | Not Applicable |
| D-8b(1)(b) | Re-evaluating Applicability of Subpart BB Standards | | Not Applicable |
| D-8b(2) | Equipment Leaks - Demonstrating Compliance | | Not Applicable |
| D-8b(2)(a) | Procedures for Identifying Equipment Location and Method of Compliance, Marking Equipment, and Ensuring Records are Up-to-date | | Not Applicable |
| D-8b(2)(b) | Demonstrating Compliance with D-8b(1)(a) and (2)(a) Procedures | | Not Applicable |
| D-8b(2)(c) | Closed Vent Systems or Control Devices: Showing Compliance with Emission Reduction Standards | | Not Applicable |
| D-8c | Tanks and Containers | | Not Applicable |
| D-8c(1) | Applicability of Subpart CC Standards | | Not Applicable |
| D-8c(2) | Tank Systems and Container Areas - Demonstrating Compliance | | Not Applicable |
| D-9 | Waste Minimization | | Chapter 10.0 |
| D-10 | Groundwater Monitoring for Land-based Units | Not Applicable | Not Applicable Chapter 5.0 |

| | | Technically Adequate? | Location in Application |
|------------|---|-----------------------|-------------------------|
| E. | Releases from Solid Waste Management Units | | Chapter 2.0 |
| E-1 | Solid Waste Management Units and Known and Suspected Releases of Dangerous Wastes or Constituents | | 2.4 |
| E-1a | Solid Waste Management Units | | 2.4 |
| E-1b | Releases | | 2.4 |
| E-2 | Corrective Actions Implemented | | 2.4 |
| F. | Procedures to Prevent Hazards | | Chapter 6.0 |
| F-1 | Security | | 6.1 |
| F-1a | Security Procedures and Equipment | | 6.1 |
| F-1b | Waiver | | 6.1.2 |
| F-2 | Inspection Plan | | 6.2 |
| F-2a | General Inspection Requirements | | 6.2 |
| F-2b | Inspection Log | | 6.2 |
| F-2c | Schedule for Remedial Action for Problems Revealed | | 6.2 |
| F-2d | Specific Process or Waste Type Inspection Requirements | | 6.2 |
| F-2d(1) | Container Inspections | | Not Applicable |
| F-2d(2) | Tank System Inspections and Corrective Actions | | Not Applicable |
| F-2d(2)(a) | Tank System Inspections | | Not Applicable |
| F-2d(2)(b) | Tank Systems - Corrective Actions | | Not Applicable |

| | | Technically Adequate? | Location in Application |
|---|--|-----------------------|-------------------------|
| F-2d(3) | Storage of Ignitable or Reactive Wastes | | 6.2 |
| F-2d(4) | Air Emissions Control and Detection - Inspections, Monitoring, and Corrective Actions | | Not Applicable |
| F-2d(4)(a) | Process Vents | | Not Applicable |
| F-2d(4)(b) | Equipment Leaks | | Not Applicable |
| F-2d(4)(c) | Tanks and Containers | | Not Applicable |
| F-2d(5) F-2d(6) F-2d(7) F-2d(8) F-2d(9) | Waste Pile Inspection Surface Impoundment Inspection Incinerator Inspection Landfill Inspection Land Treatment Facility Inspection | Not Applicable | Not Applicable |
| F-3 | Preparedness and Prevention Requirements | | 6.3 |
| F-3a | Equipment Requirements | | 6.3.1 |
| F-3b | Aisle Space Requirement | | 6.3.2 |
| F-4 | Preventive Procedures, Structures, and Equipment | | 6.4 |
| F-5 | Prevention of Reaction of Ignitable, Reactive, and/or Incompatible Wastes | | 6.5 |
| F-5a | Precautions to Prevent Ignition or Reaction of Ignitable or Reactive Waste | | 6.5 |
| F-5b | Precautions for Handling Ignitable or Reactive Waste and Mixing Incompatible Wastes | | 6.5 |
| F-5b(1) | Ignitable or Reactive Wastes In Tanks | | Not Applicable |
| F-5b(2) | Incompatible Wastes In Containers or Tanks | | Not Applicable |

| | | Technically Adequate? | Location in Application |
|-----------|--|-----------------------|-------------------------|
| G. | Contingency Plan | | Chapter 7.0 |
| G-1 | General Information | | Appendix 7A |
| G-2 | Emergency Coordinators | | Appendix 7A |
| G-3 | Circumstances Prompting Implementation | | Appendix 7A |
| G-4 | Emergency Response Procedures | | Appendix 7A |
| G-4a | Notification | | Appendix 7A |
| G-4b | Identification of Dangerous Materials | | Appendix 7A |
| G-4c | Hazard Assessment and Report | | Appendix 7A |
| G-4d | Prevention of Recurrence or Spread of Fires, Explosions, or Releases | | Appendix 7A |
| G-4f | Post-Emergency Actions | | Appendix 7A |
| G-5 | Emergency Equipment | | Appendix 7A |
| G-6 | Coordination Agreements | | Appendix 7A |
| G-7 | Evacuation Plan | | Appendix 7A |
| G-8 | Required Reports, Recordkeeping, and Certifications | | Appendix 7A |
| G-8(1) | General Requirements | | Appendix 7A |
| G-8(2) | Requirements for Tank Systems | | Not Applicable |

| | | Technically Adequate? | Location in Application |
|------------|--|-----------------------|-------------------------|
| H. | Personnel Training | | Chapter 8.0 |
| H-1 | Job Title/Job Description | | Appendix 8A |
| H-2 | Outline of Training Program | | Appendix 8A |
| H-3 | Implementation of Training Program | | Appendix 8A |
| I. | Closure and Financial Assurance | | Chapter 11.0 |
| I-1 | Closure Plan/Financial Assurance for Closure | | Chapter 11.0 |
| I-1a | Closure Performance Standard | | Chapter 11.0 |
| I-1b | Closure Activities | | Chapter 11.0 |
| I-1b(1) | Maximum Extent of Operation | | Chapter 11.0 |
| I-1b(2) | Removing Dangerous Wastes | | Chapter 11.0 |
| I-1b(3) | Decontaminating Structures, Equipment, and Soil | | Chapter 11.0 |
| I-1b(4) | Sampling and Analysis to Identify Extent of Decontamination/ Removal and to Verify Achievement of Closure Standard | | Chapter 11.0 |
| I-1b(4)(a) | Sampling to Confirm Decontamination of Structures and Soils | | Chapter 11.0 |
| I-1b(5) | Other Activities | | Chapter 11.0 |
| I-1c | Maximum Waste Inventory | | Chapter 11.0 |
| I-1d | Closure of Waste Piles, Surface Impoundments, Incinerators, Land Treatment, and Miscellaneous Units | Not Applicable | Not Applicable |
| I-1e | Closure of Landfill Units | | |
| I-1f | Schedule for Closure | | Chapter 11.0 |

| | | Technically Adequate? | Location in Application |
|-----------|---|-----------------------|-------------------------|
| I-1g | Extension for Closure Time | | Chapter 11.0 |
| I-1h | Closure Cost Estimate | | Chapter 11.0 |
| I-1i | Financial Assurance Mechanism for Closure | | Chapter 11.0 |
| I-2 | Notice in Deed of Already Closed Disposal Units | | Not Applicable |
| I-3 | Post-Closure Plan | | Not Applicable |
| I-4 | Liability Requirements | | Not Applicable |
| I-4a | Coverage for Sudden Accidental Occurrences | | Not Applicable |
| I-4b | Coverage for Nonsudden Accidental Occurrences | | Not Applicable |
| I-4c | Request for Variance | | Not Applicable |
| J. | Other Federal and State Laws | | Chapter 13.0 |
| K. | Part B Certification | | Chapter 14.0 |

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1 1.0 PART A [A]

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3
4 The original Part A, Form 3, Revision 0, for the PUREX (plutonium-uranium
5 extraction) Storage Tunnels was submitted in November 1987. A revised Part A,
6 Form 3, Revision 1, was submitted in September 1990.

7
8 The Part A, Form 3, Revision 1, was submitted to redesignate the
9 PUREX Storage Tunnels as a miscellaneous unit. Additionally, dangerous waste
10 code D001 [Washington Administrative Code (WAC) 173-303-090(5)] was added to
11 address the ignitable characteristic of the silver nitrate stored in Tunnel
12 Number 2. The estimated annual quantities of waste also were modified to
13 represent the maximum quantity of waste placed in the PUREX Storage Tunnels in
14 any given year since initial operation.

15
16 The Part A, Form 3, Revision 2, was submitted in December 1994. This
17 revision was prepared to add Dangerous Waste Numbers D006 (cadmium),
18 D007 (chromium), WT01 (state-only, toxic, extremely hazardous waste), and
19 WC02 (state-only, carcinogenic, dangerous waste) to existing Process Code
20 S05 (storage-miscellaneous). Also, State-only Dangerous Waste Numbers
21 WT02 (state-only, toxic, dangerous waste) and WP01 (state-only, persistent,
22 extremely hazardous waste) were added to Process Code S05. State-only
23 Dangerous Waste Number WT01 was removed from Dangerous Waste Number D008
24 (lead) in accordance with WAC 173-303-100.

25
26 The Part A, Form 3, Revision 3, was submitted in August 1995. This
27 revision was prepared to add dangerous waste numbers D005 (barium), D010
28 (selenium), and WT02 (state-only, toxic, dangerous waste for light mineral
29 oil) to process code (S05). State-only designations for existing dangerous
30 waste numbers were revised as follows: D006 - WT01 replaced by WT02,
31 D007 - WT01 and WT02 removed, D009 - WT01 removed, D011 - WT01 removed,
32 Fluorothene - WT02 replaced by WT01, and WP01 removed.

33
34 The Part A, Form 3, Revision 4, was submitted in May 1996. This revision
35 was prepared to replace reference to 40 CFR 264, Subpart X, with
36 WAC 173-303-680. State-only dangerous waste number WC02 (carcinogenic,
37 dangerous waste) was removed. The number of railcars presently stored in
38 Tunnel Number 2 was updated.

39
40 The Part A, Form 3, Revision 5, included in this permit application
41 documentation consists of five pages, three figures, and one photograph, and
42 was prepared in support of the transition of contract responsibilities from
43 Westinghouse Hanford Company to the new Project Hanford Management Contractor.

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III. PROCESSES (continued)

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESS (code "T04"). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACI

S05

The PUREX Storage Tunnels, a miscellaneous unit (S05), are used for storage of mixed waste subject to the requirements of WAC 173-303-680. The two tunnels store waste from the PUREX Plant and other onsite sources. Since being placed into service, mixed waste has been stored in the tunnels on railcars. Not all material stored in the tunnels contains mixed waste.

The construction of Tunnel Number 1 was completed in 1956. The tunnel is approximately 5.8 meters (19 feet) wide by 6.7 meters (22 feet) high by 109 meters (358 feet) long and provides storage space for eight railcars. Between June 1960 and January 1965, all eight railcar positions were filled and the tunnel subsequently was sealed. The combined volume of the equipment stored on the eight railcars presently in Tunnel Number 1 is approximately 596 cubic meters (780 cubic yards). The maximum process design capacity for storage in Tunnel Number 1 is approximately 4,129 cubic meters (5,400 cubic yards).

The construction of Tunnel Number 2 was completed in 1964. Tunnel Number 2 is approximately 5.8 meters (19 feet) wide by 6.7 meters (22 feet) high by 514 meters (1,686 feet) long and provides storage space for 40 railcars. The first railcar was placed in Tunnel Number 2 in December 1967 and as of July 1996, 28 railcars have been placed in the tunnel. The combined volume of equipment stored on the 28 railcars presently in Tunnel Number 2 is approximately 2,204 cubic meters (2,883 cubic yards). The maximum process design capacity for storage in Tunnel Number 2 is approximately 19,878 cubic meters (26,000 cubic yards).

IV. DESCRIPTION OF DANGEROUS WASTES

A. DANGEROUS WASTE NUMBER - Enter the four digit number from Chapter 173-303 WAC for each listed dangerous waste you will handle. If you handle dangerous wastes which are not listed in Chapter 173-303 WAC, enter the four digit number(s) that describes the characteristics and/or the toxic contaminants of those dangerous wastes.

B. ESTIMATED ANNUAL QUANTITY - For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.

C. UNIT OF MEASURE - For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

| ENGLISH UNIT OF MEASURE | CODE |
|-------------------------|------|
| POUNDS | P |
| TONS | T |

| METRIC UNIT OF MEASURE | CODE |
|------------------------|------|
| KILOGRAMS | K |
| METRIC TONS | M |

If facility records use any other unit of measure for quantity, the unit of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

II. PROCESSES

1. PROCESS CODES:

For listed dangerous waste: For each listed dangerous waste entered in column A select the code(s) from the list of process codes contained in Section III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed dangerous wastes: For each characteristic or toxic contaminant entered in Column A, select the code(s) from the list of process codes contained in Section III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed dangerous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right of box of item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: DANGEROUS WASTES PROCESS BY MORE THAN ONE DANGEROUS WASTE NUMBER - Dangerous wastes that can be described by more than one Waste Number shall be described on the form as follows:

1. Select one of the Dangerous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other Dangerous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other Dangerous Waste Number that can be used to describe the dangerous waste.

EXAMPLE FOR COMPLETING SECTION IV (shown in line numbers X-1, X-2, X-3, and X-4 below) - A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

| N O. DANGEROUS WASTE NO. (enter code) | A. DANGEROUS WASTE NO. (enter code) | B. ESTIMATED ANNUAL QUANTITY OF WASTE | C. UNIT OF MEA- SURE (enter code) | D. PROCESSES | |
|---|--|--|---|-----------------------------|---------------------|
| | | | | 1. PROCESS CODES (enter) | |
| -1 | K 0 5 4 | 900 | P | T 0 3 D 8 0 | 1 1 1 1 |
| -2 | D 0 0 2 | 400 | P | T 0 3 D 8 0 | 1 1 1 1 |
| -3 | D 0 0 1 | 100 | P | T 0 3 D 8 0 | 1 1 1 1 |
| -4 | D 0 0 2 | | P | T 0 3 D 8 0 | 1 1 1 1 |
| | | | | | included with above |

Continued from page 2.
NOTE: Photocopy this page before completing if you have more than 26 wastes to list.

| | | | | | | | | | |
|-----------------------------------|--|--|--|--|--|--|--|--|--|
| I.D. NUMBER (entered from page 1) | | | | | | | | | |
| 7 8 9 0 0 0 8 9 6 7 | | | | | | | | | |

IV. DESCRIPTION OF DANGEROUS WASTES (continued)

| LINE | A. DANGEROUS WASTE NO. (enter code) | B. ESTIMATED ANNUAL QUANTITY OF WASTE | C. UNIT OF MEA- SURE (enter code) | D. PROCESSES | | | | | 2. PROCESS DESCRIPTION (if a code is not entered in D(1)) |
|------|--|--|---|-----------------------------|---|---|---|---|--|
| | | | | 1. PROCESS CODES (enter) | | | | | |
| 1 | D 0 0 5 | 454* | K | S05 | 1 | 1 | 1 | 1 | Storage - Miscellaneous |
| 2 | D 0 0 6 | 454* | | | 1 | 1 | 1 | 1 | |
| 3 | W T 0 2 | | | | 1 | 1 | 1 | 1 | |
| 4 | D 0 0 7 | 454* | | | 1 | 1 | 1 | 1 | |
| 5 | D 0 0 8 | 8,000* | | | 1 | 1 | 1 | 1 | |
| 6 | D 0 0 9 | 45* | | | 1 | 1 | 1 | 1 | |
| 7 | D 0 1 0 | 454* | | | 1 | 1 | 1 | 1 | |
| 8 | D 0 1 1 | 680* | | | 1 | 1 | 1 | 1 | |
| 9 | D 0 0 1 | | | | 1 | 1 | 1 | 1 | |
| 10 | W T 0 2 | 454* | Y | Y | 1 | 1 | 1 | 1 | Included With Above |

* The estimated annual quantity of waste listed above represents the maximum quantity of waste placed in either tunnel in a given year.

| | | | | | | | | | |
|----|--|--|--|--|---|---|---|---|--|
| 13 | | | | | | | | | |
| 14 | | | | | 1 | 1 | 1 | 1 | |
| 15 | | | | | 1 | 1 | 1 | 1 | |
| 16 | | | | | 1 | 1 | 1 | 1 | |
| 17 | | | | | 1 | 1 | 1 | 1 | |
| 18 | | | | | 1 | 1 | 1 | 1 | |
| 19 | | | | | 1 | 1 | 1 | 1 | |
| 20 | | | | | 1 | 1 | 1 | 1 | |
| 21 | | | | | 1 | 1 | 1 | 1 | |
| 22 | | | | | 1 | 1 | 1 | 1 | |
| 23 | | | | | 1 | 1 | 1 | 1 | |
| 24 | | | | | 1 | 1 | 1 | 1 | |
| 25 | | | | | 1 | 1 | 1 | 1 | |
| 26 | | | | | 1 | 1 | 1 | 1 | |

Continued from the front.

IV. DESCRIPTION OF DANGEROUS WASTES (continued)

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM SECTION D(1) ON PAGE 3.

The waste stored in the tunnels could include barium (D005), cadmium (D006), chromium (D007), lead (D008), mercury (D009), selenium (D010), silver (D011), and light mineral oil (WT02, state-only, toxic, dangerous waste) contained in oil absorption material. The silver is predominately in the form of salts and is considered ignitable (D001) because of the presence of silver nitrate (AgNO_3). Cadmium also could be considered state-only, toxic, dangerous waste (WT02).

V. FACILITY DRAWING Refer to attached drawing(s).

All existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail).

VI. PHOTOGRAPHS Refer to attached photograph(s).

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

VII. FACILITY GEOGRAPHIC LOCATION This information is provided on the attached drawing(s) and photograph(s).

LATITUDE (degrees, minutes, & seconds)

| | | | |
|--|--|--|--|
| | | | |
| | | | |
| | | | |

LONGITUDE (degrees, minutes, & seconds)

| | | | |
|--|--|--|--|
| | | | |
| | | | |
| | | | |

VIII. FACILITY OWNER

A. If the facility owner is also the facility operator as listed in Section VII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER

2. PHONE NO. (area code & no.)

3. STREET OR P.O. BOX

4. CITY OR TOWN

5. ST.

6. ZIP CODE

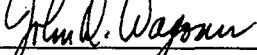
IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

NAME (print or type)

John D. Wagoner, Manager
U.S. Department of Energy
Richland Operations Office

SIGNATURE



DATE SIGNED

9/26/96

X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

NAME (print or type)

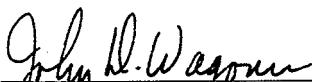
SEE ATTACHMENT

SIGNATURE

DATE SIGNED

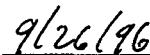
X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.



Owner/Operator

John D. Wagoner, Manager
U.S. Department of Energy
Richland Operations Office

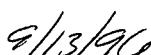


Date



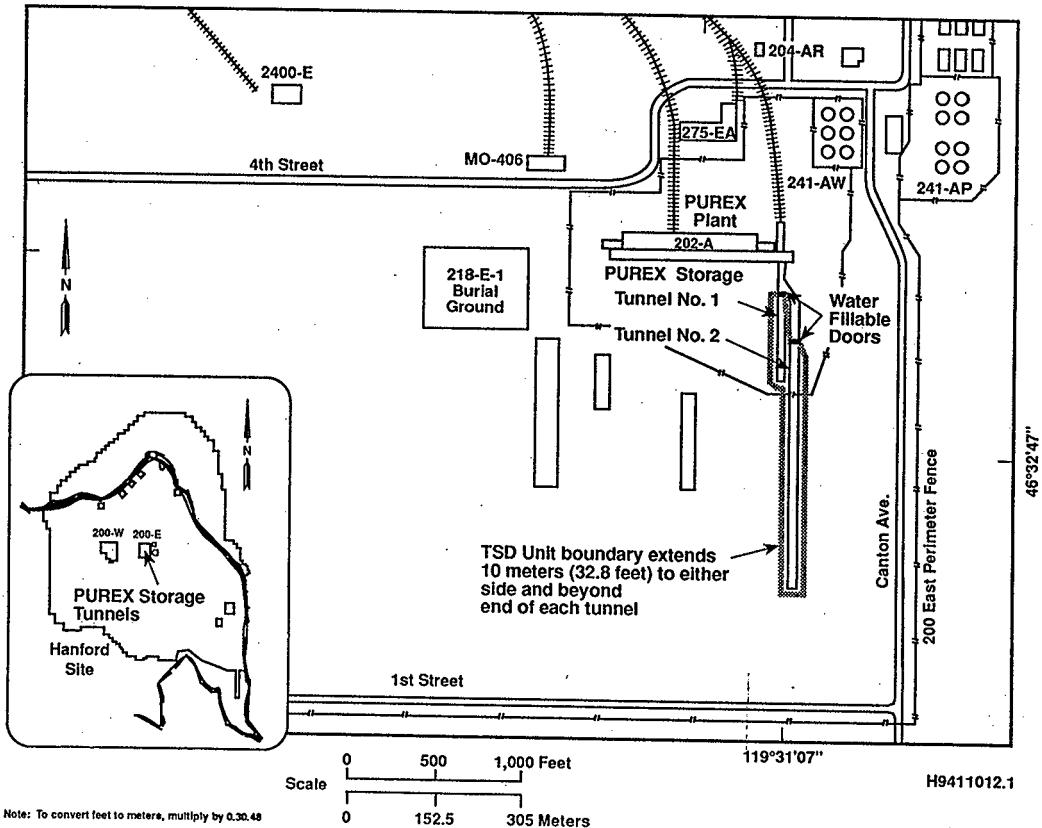
Co-operator

H. J. Hatch,
President and Chief Executive Officer
Fluor Daniel Hanford, Inc.

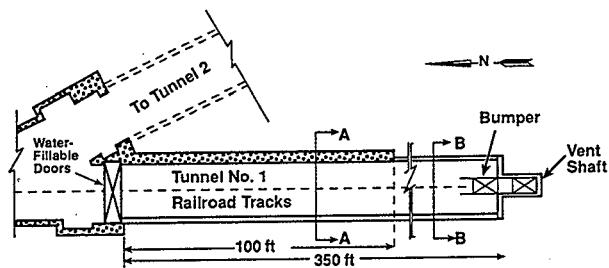


Date

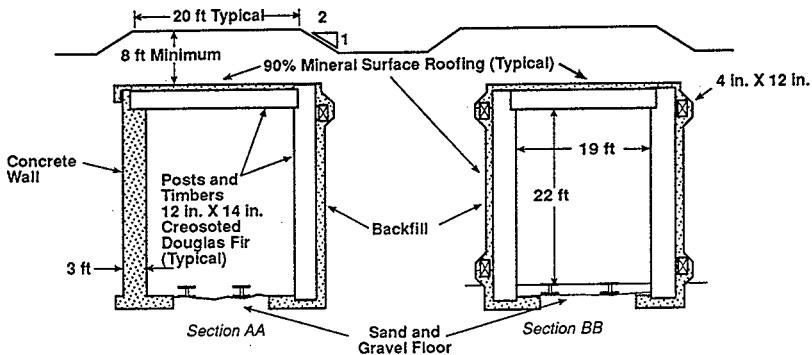
PUREX Storage Tunnels Site Plan



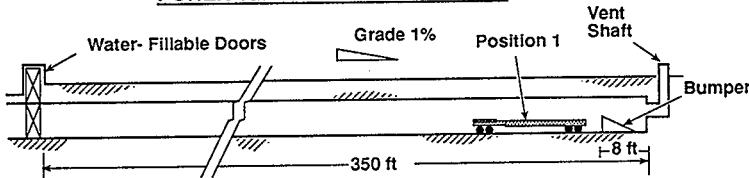
PUREX Tunnel No. 1 - Details



PUREX Tunnel No.1 - Plan View



PUREX Tunnel No.1 - Section View

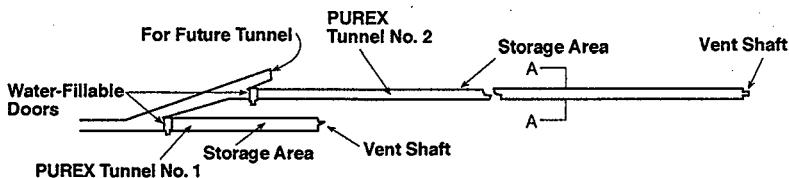


PUREX Tunnel No.1 - Elevation View

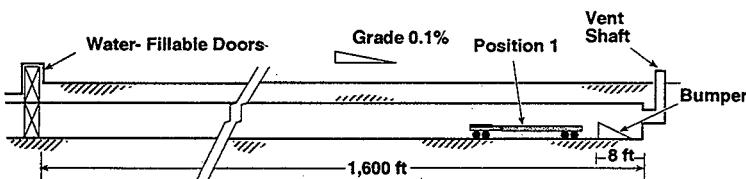
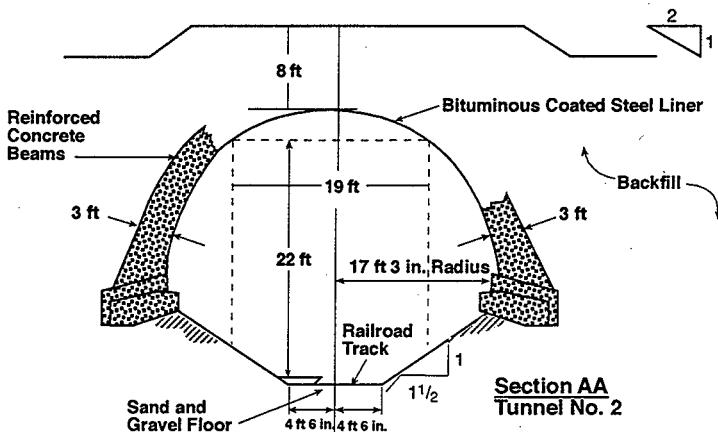
For conversion to meters, multiply feet by 0.3048.
For conversion to centimeters, multiply inches by 2.54.

H96030106.2

PUREX Tunnel No. 2 - Details



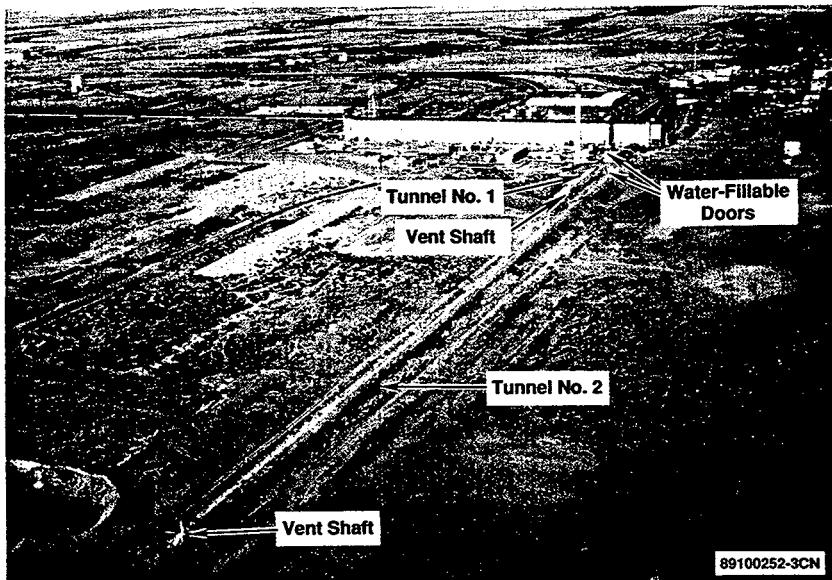
PUREX Tunnels - Plan View



PUREX Tunnel No. 2 - Elevation View

For conversion to meters, multiply feet by 0.3048.
For conversion to centimeters, multiply inches by 2.54.

PUREX STORAGE TUNNELS



46°32'47"
119°31'07"

89100252-3CN
(PHOTO TAKEN 1989)

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12 APPENDIX

| | | | |
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3
4
5

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1 **2.0 FACILITY DESCRIPTION AND GENERAL PROVISIONS [B AND E]**

2

3

4 This chapter briefly describes the PUREX Storage Tunnels location and

5 operational information, including the following:

6

7 • General description

8 • Topography

9 • Traffic information.

10

11 A more detailed discussion of the waste types, known characteristics, and

12 operating methods of the PUREX Storage Tunnels is provided in Chapters 3.0

13 and 4.0, respectively. Because dangerous waste is not considered by the

14 DOE-RL to include the source, special nuclear, and by-product material

15 components of mixed waste, radionuclides are not within the scope of this

16 permit application documentation. The information on radionuclides is

17 provided only for general knowledge.

18

19 The PUREX Facility, located in the 200 East Area (Figures 2-1 and 2-2),

20 consists of two separate treatment, storage, and/or disposal (TSD) units, the

21 PUREX Plant (202-A Building) and the PUREX Storage Tunnels.

22

23 In 1991, the PUREX Plant ceased operations and was placed in a standby

24 mode. In December 1992, the U.S. Department of Energy notified the

25 U.S. Department of Energy, Richland Operations Office (DOE-RL) that the PUREX

26 Plant would no longer operate and directed the PUREX Plant to transition into

27 deactivation. The PUREX Storage Tunnels provided direct support to transition

28 activities by accepting PUREX Plant waste material for storage. On a case-by-

29 case basis, the PUREX Storage Tunnels could accept waste generated from other

30 sources on the Hanford Facility.

31

32 Access to the PUREX Storage Tunnels is by means of the railroad tunnel.

33 The reinforced concrete walls and roof of the railroad tunnel that extend

34 southward have been deleted from Figure 2-3 to show the cask car and the

35 extended railroad track.

36

37

38 **2.1 THE PUREX STORAGE TUNNELS DESCRIPTION [B-1]**

39

40 The PUREX Storage Tunnels branch off from the railroad tunnel and extend

41 southward from the east end of the PUREX Plant (Figure 2-2). The tunnels are

42 used for storage of mixed waste from the PUREX Plant and from other onsite

43 sources. Each storage tunnel is isolated from the railroad tunnel by a

44 water-fillable shielding door. There are no electrical utilities, water

45 lines, drains, fire detection or suppression systems, radiation monitoring, or

46 communication systems provided inside the PUREX Storage Tunnels.

47

48 Material selected for storage is loaded on railcars modified to serve as

49 both transport and storage platforms. Normally, a remote-controlled,

50 battery-powered locomotive was used to position the railcar in the storage

51 tunnel. In the past and possibly in the future, other remote movers, e.g.,

52 standard locomotive with a string of railcar spacers, power winch, etc., have

1 or could be used to position a railcar into the tunnel or to withdraw a car
2 from the tunnel. The railcar storage positions are numbered sequentially,
3 commencing with Position 1 that abuts the railstop bumper at the south end of
4 each tunnel. Position 2 is the location of the railcar that abuts the railcar
5 in Position 1 and so forth. The railcars and material remain in the storage
6 tunnel until retrieval is required. Each railcar is retrievable; however,
7 because the railcars are stored on a single, dead-end railroad track, the
8 railcars can be removed only in reverse order (i.e., last in, first out).

9
10 Transfers into or out of the PUREX Storage Tunnels were infrequent and
11 were not manpower-intensive operations. A more detailed description of the
12 operation of the PUREX Storage Tunnels is provided in Chapter 4.0.

13
14
15 **2.1.1 Tunnel Number 1 (218-E-14)**

16
17 Construction of Tunnel Number 1 was completed in 1956 and consists of
18 three areas: the water-fillable door, the storage area, and the vent shaft
19 (Figure 2-4). The water-fillable door is located at the north end of Tunnel
20 Number 1 and separates the storage tunnel from the PUREX railroad tunnel. The
21 door is 7.5 meters high, 6.6 meters wide, and 2.1 meters thick, and is
22 constructed of 1.3 centimeter steel plate. The door is hollow so that the
23 door can be filled with water to act as a radiation shield when the door is in
24 the down (closed) position. If the door is filled with water, the water must
25 be pumped from the door before the door can be raised.

26
27 Above the door is a reinforced concrete structure into which the door is
28 raised to open the tunnel. Electric hoists used for opening and closing the
29 door are located on the top of this concrete structure.

30
31 Pumps and valves used for filling and draining the door are located in a
32 room northwest of the door closure. Operational controls are located in the
33 PUREX Plant on the north wall at the east end of the pipe and operating
34 gallery.

35
36 Beneath the water-fillable door is a sump with a 15.2-centimeter drain
37 that connects to a railroad tunnel sump; water was pumped to the Double-Shell
38 Tank System. The drain was sealed as part of deactivation activities.

39
40 The storage area is that portion of the tunnel that extends southward
41 from the water-fillable door. Inside dimensions of Tunnel Number 1 are
42 109.1 meters long, 6.7 meters high, and 5.9 meters wide. Ceiling and walls
43 are 35.6 centimeters thick and constructed of 30.5- by 35.6-centimeter
44 creosote pressure-treated Douglas fir timbers arranged side by side. The
45 first 30.5 meters of the east wall are constructed of 0.9-meter-thick
46 reinforced concrete (Section AA of Figure 2-4). A 40.8-kilogram-
47 mineral-surface roofing material was used to cover the exterior surface of the
48 timbers before placement of 2.4 meters of earth fill. The earth cover serves
49 as protection from the elements and as radiation shielding. The timbers that
50 form the walls rest on reinforced concrete footings 0.9 meter wide by
51 0.3 meter thick. The floor consists of a railroad track laid on a gravel bed.

1 The space between the ties is filled to top-of-tie with gravel ballast. The
2 tracks are on a 1.0 percent downward slope to the south to ensure that the
3 railcars remain in their storage position. A railcar bumper is located
4 2.4 meters from the south end of the tracks to act as a stop. The capacity of
5 the storage area is eight, 12.8-meter-long railcars.

6
7 From 1962 through 1980, nine pipe risers were installed through the roof
8 of Tunnel Number 1. Seven of the nine risers were used for wood sampling of
9 the tunnel ceiling timbers. The other two risers were used to obtain air
10 samples and temperature data of the internal environment of the tunnel.
11 Currently, all risers are capped.

12
13 The results of the wood strength survey (conducted in 1980) concluded
14 that the wood beams in Tunnel Number 1 were within standards for present day
15 wood. Design calculations performed at the time also found the tunnel to be
16 "within safe limits" (Silvan 1980). Air sampling conducted in Tunnel Number 1
17 did not identify the presence of any combustible gases and found oxygen levels
18 to be at about 21 percent with carbon dioxide at about 0.3 percent. The
19 reported temperature in Tunnel Number 1 remains consistent at 15.6 °C
20 (Rambosek and Foster 1972).

21
22 An independent evaluation of the 1980 data collected by Silvan was
23 conducted in 1991 to further evaluate the structural integrity of PUREX
24 Storage Tunnel Number 1 (Hand and Stevens 1991). This study concluded that
25 any degradation of the treated timbers because of decay or insect attack
26 should be minimal and found that the tunnel timbers structurally should be
27 sound. This study also confirmed the reasonableness of the values used and
28 agreed with the findings of the Silvan study. In addition, the study
29 concluded that the methods used by Silvan to calculate the loss of timber
30 strength were sufficiently conservative to accurately determine the soundness
31 of the timbers. The exposure of the timbers to the high gamma radiation field
32 emitted by the material stored within the tunnel was factored into the
33 evaluation.

34
35 A vent shaft is located at the south end of Tunnel Number 1. The shaft
36 is approximately 1.5 meters by 1.5 meters in cross-section and is constructed
37 of reinforced concrete. The vent stack extends approximately 0.3 meter above
38 grade and was capped with a single-stage, high-efficiency particulate air
39 (HEPA) filter, a 283-cubic-meter per minute exhaust fan, and a 6.1-meter tall
40 exhaust stack. After filling Tunnel Number 1 to capacity, the tunnel was
41 sealed. Sealing activities included de-energizing the ventilation system and
42 blanking the ventilation system to prevent interaction of the tunnel air with
43 external air. Deactivation of the vent system is described in Chapter 4.0,
44 Section 4.1.6.1. A further discussion of the tunnel ventilation system is
45 provided in Chapter 4.0.

46
47 In June 1960, the first two railcars were loaded with a single,
48 approximately 12.5-meter-long, failed separation column and placed in Tunnel
49 Number 1. Between June 1960 and January 1965, six more railcars were placed
50 in Tunnel Number 1, filling the tunnel. After the last car was placed in the
51 northern-most storage position (Position 8), the water-fillable door was

1 closed, filled with water, and deactivated electrically. The Tunnel Number 1
2 door was drained as part of PUREX Facility transition activities.
3
4

5 **2.1.2 Tunnel Number 2 (218-E-15)**

6
7 Construction of Tunnel Number 2 was started and completed in 1964. Like
8 Tunnel Number 1, Tunnel Number 2 consists of three functional areas: the
9 water-fillable door, the storage area, and the vent shaft. Construction of
10 Tunnel Number 2 differs from that of Tunnel Number 1 as follows.
11

- 12 • A combination of steel and reinforced concrete was used in the
13 construction of the storage area for Tunnel Number 2 (Figure 2-5)
14 rather than wood timbers, as used in Tunnel Number 1.
15
- 16 • Tunnel Number 2 is longer, having a storage capacity of five times
17 that of Tunnel Number 1.
18
- 19 • The floor of Tunnel Number 2, outboard of the railroad ties, slopes
20 upward to a height of approximately 1.8 meters above the railroad bed,
21 whereas the floor in Tunnel Number 1 remains flat all the way out to
22 the side walls.
23
- 24 • The railroad tunnel approach to Tunnel Number 2 angles eastward then
25 angles southward to parallel Tunnel Number 1 (Figure 2-4). The
26 approach to Tunnel Number 1 is a straight extension southward from the
27 PUREX Plant. Center-line to center-line distance between the two
28 tunnels is approximately 18.3 meters.
29

30 The physical structure of the water-fillable door at the north end of
31 Tunnel Number 2 essentially is identical to the water-fillable door for Tunnel
32 Number 1. The water-fillable door for Tunnel Number 2 is approximately
33 57.9 meters south and 18.3 meters east of the water-fillable door for Tunnel
34 Number 1 (Figure 2-2).
35

36 Controls for operation of the water-fillable door are located above the
37 tunnel on the east exterior wall of the door enclosure (Chapter 4.0,
38 Figure 4-1). Chapter 4.0 provides additional operational information on the
39 Tunnel Number 2 water-fillable door. Presently, the door is empty and there
40 are no plans to fill it. Procedures for filling and draining the door are
41 presented in Chapter 4.0.
42

43 The storage area of Tunnel Number 2 is that portion of the tunnel.
44 extending southward from the water-fillable door. Construction of this
45 portion of Tunnel Number 2 consists of a 10.4-meter diameter, steel
46 (0.5 centimeter plate), semicircular-shaped roof, supported by internal I-beam
47 wales attached to external, reinforced concrete arches. The concrete arches
48 are 0.4-meter thick and vary in width from 0.4 to 1.8 meters. The arches are
49 spaced on 4.8-meter centers. This semicircular structure is supported on
50 reinforced concrete grade beams approximately 1.8 meters wide by 1.2 meters
51 thick (one on each side) that run the full length of Tunnel Number 2. The
52 interior and exterior surfaces of the steel roof are coated with a bituminous

1 coating compound to inhibit corrosion. The entire storage area is covered
2 with 2.4 meters of earth fill to serve as radiation shielding.

3
4 The nominal inside dimensions of Tunnel Number 2 are 514.5 meters long,
5 7.9 meters high, and 10.4 meters wide. However, because of the arch-shaped
6 cross-section of Tunnel Number 2 and entry clearance at the water-fillable
7 door, the usable storage area (width and height above top-of-rail) is
8 6.7 meters high and 5.8 meters wide, the same dimensions as for Tunnel
9 Number 1. The floor consists of a railroad track laid on a gravel bed. The
10 space between ties is filled to top-of-tie with gravel ballast. Commencing at
11 the ends of the 2.4-meter-long ties, the earth floor is sloped upward on a
12 1 (vertical) to 1 1/2 (horizontal) grade. The tracks are on a 1/10 of
13 1 percent downgrade slope to the south to ensure the railcars remain in their
14 storage position. A railcar bumper is located 2.4 meters from the south end
15 of the tracks to act as a stop. The capacity of the storage area is 40,
16 12.8-meter-long railcars.
17

18 There are 17 tunnel ports located along the ridge of the tunnel roof (for
19 details, refer to Drawing H-2-58195 in Appendix 4A). The ports are on
20 29.3-meter centers. A 7.6-centimeter diameter bar plug is located in the
21 center of each tunnel port and is secured in place with a length of chain and
22 a padlock. Operations administers access control of these tunnel ports.
23

24 The vent shaft, located at the south end of Tunnel Number 2, is
25 approximately 1.5 meters by 1.5 meters in cross-section and is constructed of
26 reinforced concrete. The vent shaft extends approximately 0.3 meter above
27 grade and is capped with an exhaust system consisting of a single-stage, HEPA
28 filter, a 153-cubic meter per minute exhaust fan, and a 6.1-meter-tall exhaust
29 stack. The ventilation system currently is inactive (Chapter 4.0,
30 Section 4.6.1.2); however, when operating the exhaust fan normally is damped
31 to provide only about 100 cubic meters per minute of exhaust flow. A further
32 discussion of the tunnel ventilation system is provided in Chapter 4.0.
33

34 The first railcar was placed in storage in December 1967. Table 1 in
35 Appendix 3A contains current storage inventory data.
36

37
38 **2.1.3 Other Environmental Permits**

39 Applicable air permits have been issued and are on file. A radioactive
40 air emissions notice of construction for the transfer of waste from the
41 324 Building for storage in PUREX Storage Tunnel Number 2 has been submitted.
42

43
44
45 **2.2 TOPOGRAPHIC MAP [B-2]**

46 A topographic map (Drawing H-2-79998), showing a distance of at least
47 305 meters around the PUREX Storage Tunnels, is located in Appendix 2A. This
48 map is at a scale of 1 unit equals 2,000 units. The contour interval clearly
49 shows the pattern of surface water flow in the vicinity of each storage
50 tunnel. The map contains the following information:
51

- Map scale
- Date
- Prevailing wind speed and direction
- A north arrow
- Surrounding land use
- Buildings
- Access road location
- Access control
- Monitoring and sampling well locations
- TSD unit locations.

2.3 TRAFFIC INFORMATION FOR THE PUREX STORAGE TUNNELS [B-4]

General traffic information for the Hanford Facility is presented in the General Information Portion (DOE/RL-91-28).

2.3.1 The PUREX Storage Tunnels Roadway Access

The paved roads providing access to the 200 East Area and the PUREX Facility also provide adequate all-weather access to the external portions of the PUREX Storage Tunnels (Figure 2-1). A paved parking area is provided northwest of the main gate.

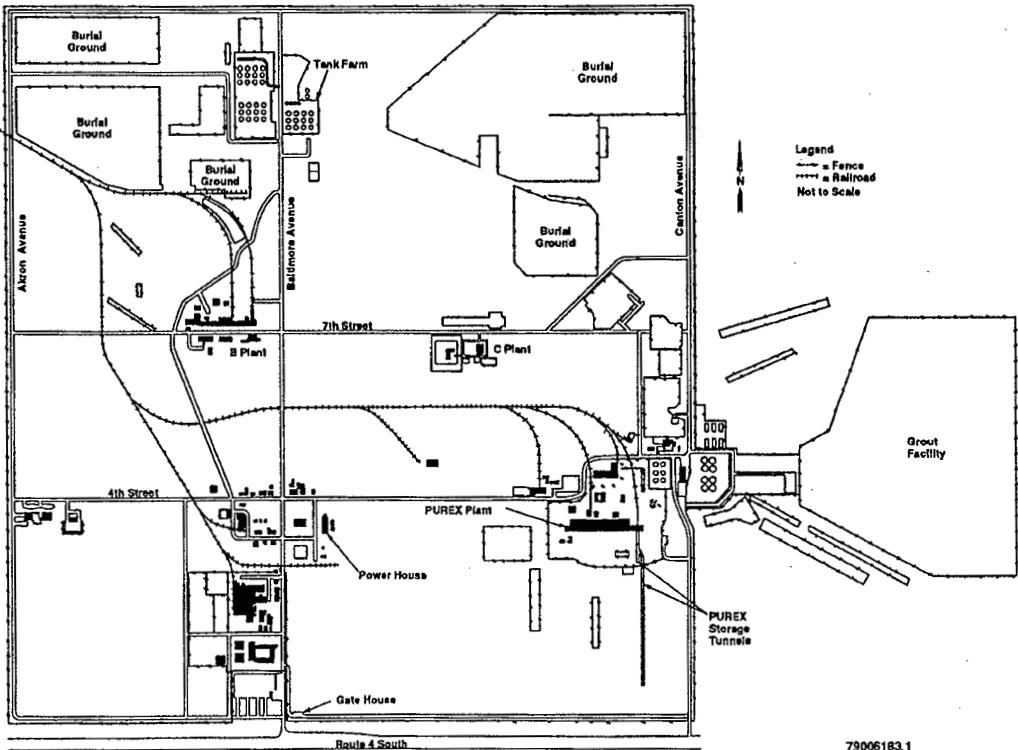
2.3.2 The PUREX Storage Tunnels Railroad Access

Railroad access to the PUREX Storage Tunnels is by an extension of the railroad spur that services the PUREX Plant (Figure 2-2).

2.4 RELEASE FROM SOLID WASTE MANAGEMENT UNITS [E]

Information concerning releases from solid waste management units is discussed in the General Information Portion (DOE/RL-91-28, Appendix 2D).

200 East Area



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Figure 2-1. The 200 East Area.

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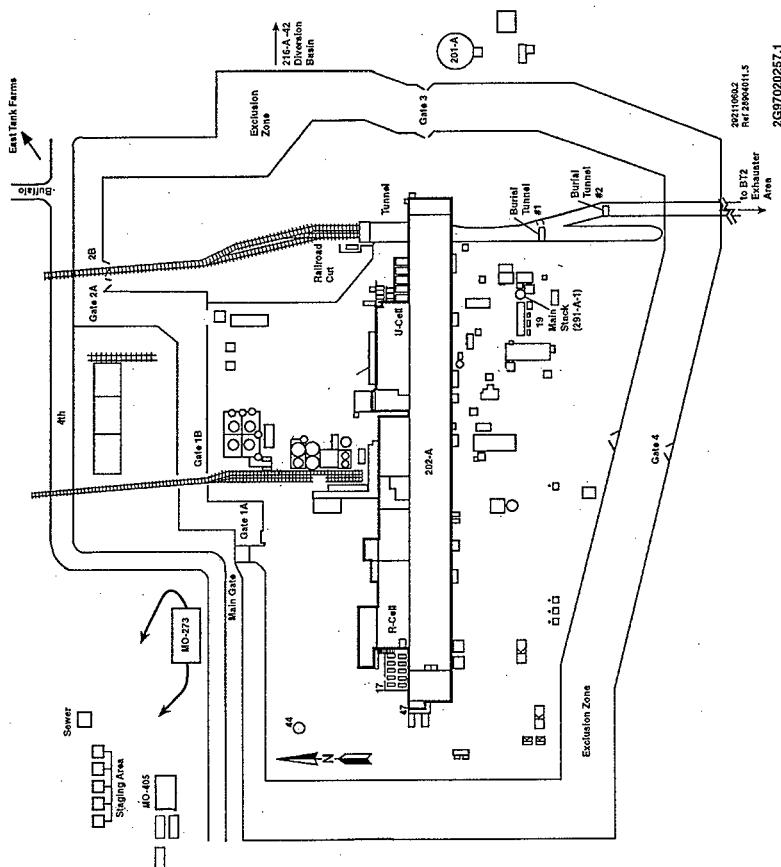
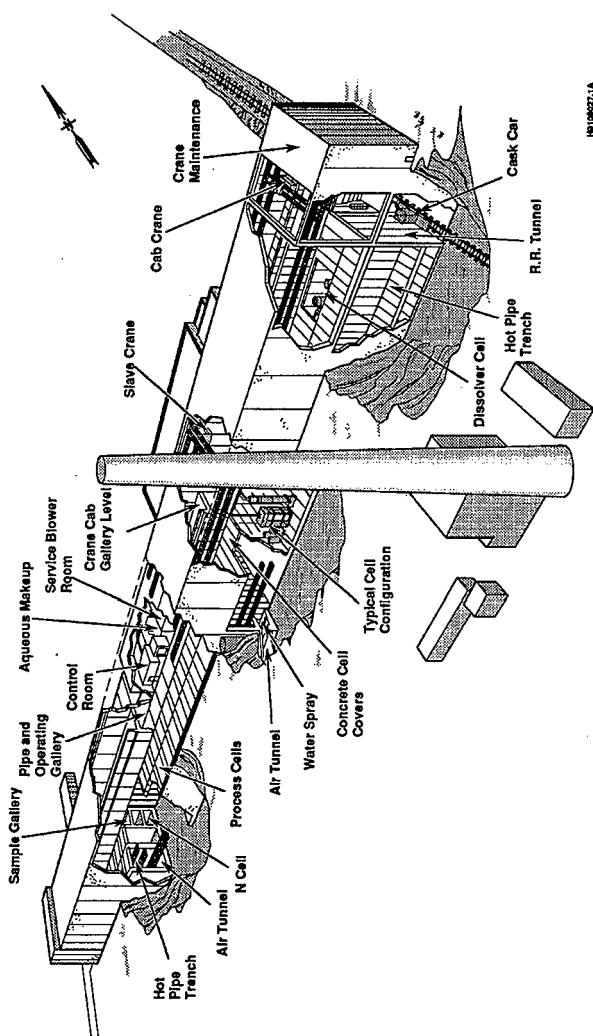
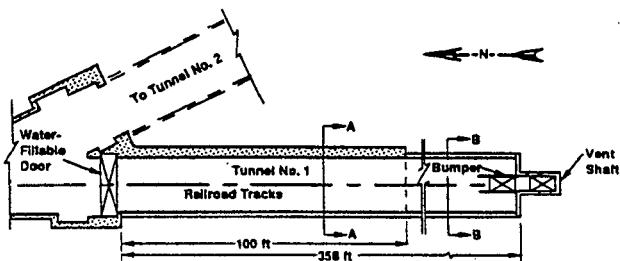


Figure 2-2. The PUREX Facility.

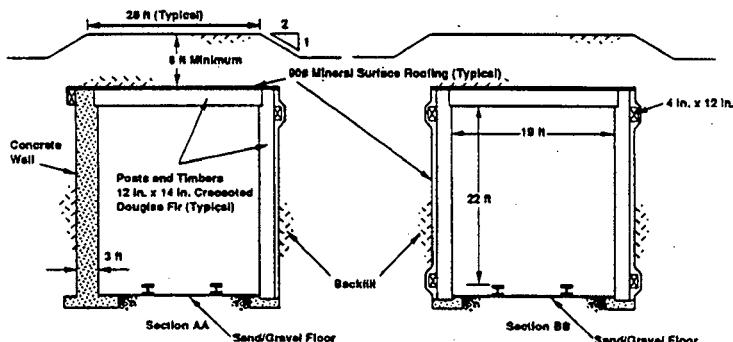
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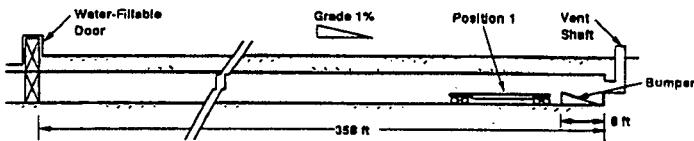
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Tunnel No. 1 - Plan View



PUREX Tunnel No. 1 - Section Views

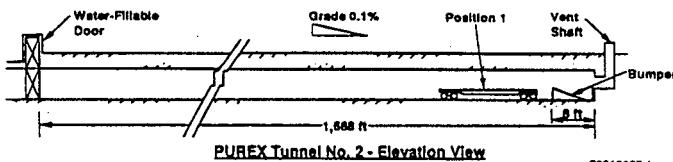
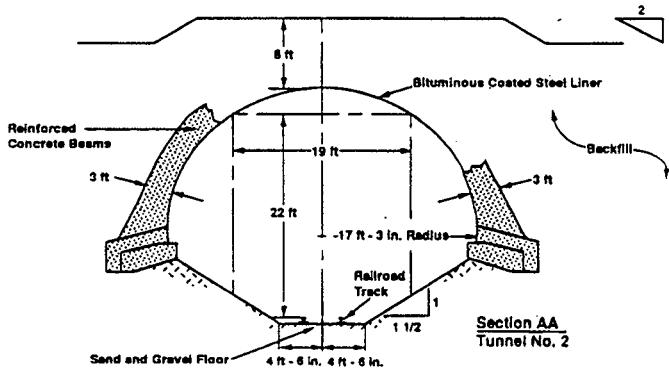
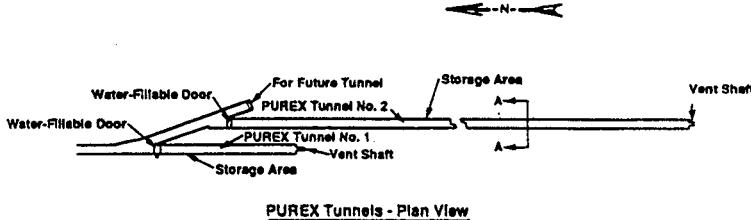


PUREX Tunnel No. 1 - Elevation View

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Figure 2-4. The PUREX Storage Tunnel Number 1.

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Figure 2-5. The PUREX Storage Tunnel Number 2.

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3.0 WASTE ANALYSIS [C]

This chapter provides information on the chemical, biological, and physical characteristics of the dangerous waste stored in the PUREX Storage Tunnels. A waste analysis plan (Appendix 3A) describes the methodology used in the characterization of the stored waste. Knowledge of the characteristics of the dangerous waste to be stored is used to ensure that the waste is managed properly.

Waste stored in the tunnels is mixed waste as a result of radioactive contamination. Because the dangerous waste is an integral part of radioactively contaminated material, this waste is managed as a mixed waste. The PUREX Storage Tunnels provide the necessary shielding for the protection of employees and the environment.

3.1 CHEMICAL, BIOLOGICAL, AND PHYSICAL ANALYSES [C-1]

Regulated material presently stored in the PUREX Storage Tunnels contains the following dangerous waste:

- Lead
- Mercury
- Silver and silver salts
- Chromium
- Cadmium
- Barium
- Mineral oil.

In general, dangerous waste is either attached to, contained within, or actually is material removed from the PUREX Plant and other onsite sources. Changes in the amount of dangerous waste stored will be updated annually in the annual dangerous waste report submitted to Ecology. Future storage of barium and selenium may occur in Tunnel Number 2. Further discussion of waste types is included in the waste analysis plan (Appendix 3A).

The PUREX Storage Tunnels are being permitted as a miscellaneous unit under WAC 173-303-680 because the tunnels are not a typical containerized storage unit. That is, the bulk of the material stored in the tunnels is not placed in a container; rather, this material is placed on a portable device (railcar) used as a storage platform. In general, the mixed waste stored in the PUREX Storage Tunnels is encased or contained within carbon or stainless steel plate, pipe or vessels that meets the WAC 173-303-040 definition of container. Therefore, the mixed waste normally is not exposed to the tunnel environment.

The only free-liquid dangerous waste stored in the tunnels is elemental mercury. The mercury is contained within thick-walled (0.8-centimeter) thermowells. The amount of mercury per thermowell is less than 1.7 liters.

1 Other liquid containers, such as large discarded process tanks, are
2 stored in the PUREX Storage Tunnels. These containers are 'empty'
3 [per WAC 173-303-160(2)(a)]. In the future, containers will be flushed and
4 the final rinsate sampled and analyzed to verify that the residual heel is not
5 a dangerous waste.

6
7 The only stored mixed waste that is designated as either reactive or
8 ignitable (D001) is silver nitrate in the silver reactors
9 [WAC 173-303-090(5)]. There is no mixed waste designated as reactive (D003).
10 The potential for ignition from this source is considered to be negligible
11 because this material is dispersed on ceramic packing and is physically
12 isolated from contact with any combustible material or ignition source.

13
14 **3.2 WASTE ANALYSIS PLAN [C-2]**

15
16 The *Waste Analysis Plan for the PUREX Storage Tunnels* is provided in
17 Appendix 3A.

18
19 **3.3 TRACKING SYSTEM [C-4]**

20
21 Specific waste tracking forms for the movement of waste destined for the
22 PUREX Storage Tunnels are used. These waste tracking forms effectively track
23 waste inventories from generation through storage.

24
25 The waste tracking forms and other supporting documentation will be
26 maintained at the Hanford Facility for a minimum of 5 years following closure
27 of the PUREX Storage Tunnels.

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APPENDIX

APP 4A-i

FIGURE

45 4-1. Water-Fillable Door Exterior (Tunnel Number 2) F4-1

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1 4.0 PROCESS INFORMATION [D]

2
3
4 This chapter discusses the processes involved in the operation of the
5 PUREX Storage Tunnels. The PUREX Storage Tunnels are used for the storage of
6 mixed waste from the PUREX Plant and other onsite sources.

7
8 The PUREX Storage Tunnels were designed and constructed to provide a
9 means of protecting personnel and the environment from radiation associated
10 with stored material. This design also serves to protect personnel and the
11 environment from the dangerous waste component of the mixed waste stored
12 inside the tunnels. A physical description of the PUREX Storage Tunnels is
13 provided in Chapter 2.0.

14
15 The PUREX Storage Tunnels are being permitted as a miscellaneous unit
16 under WAC 173-303-680. The WAC regulations require that miscellaneous unit
17 permit terms and provisions address appropriate requirements provided for
18 other TSD units. Because the operation and construction of the PUREX Storage
19 Tunnels most closely resemble that of a container storage unit, the
20 appropriate requirements prescribed for a container storage unit are addressed
21 in this chapter.

22 23 4.1 OPERATION OF THE PUREX STORAGE TUNNELS

24
25
26 This section describes the selection, characterization, preparation,
27 placement, and removal activities associated with storage of mixed waste in
28 the PUREX Storage Tunnels. Except as noted, these activities also apply to
29 the storage of radioactive waste placed in the PUREX Storage Tunnels.

30 4.1.1 Preparation for Tunnel Activities

31
32
33 Management, with the concurrence of an appropriate cognizant engineer,
34 determines when material is to be removed and transported to the PUREX Storage
35 Tunnels. A job specific work plan describing the overall transfer activities
36 is prepared.

37
38 4.1.1.1 Storage/Removal Equipment Preparation. A remotely controlled,
39 battery-powered locomotive normally was used to move railcars into and out of
40 the PUREX Storage Tunnels. Other mechanical means such as a standard
41 locomotive or a winch also can be used independently or in combination with
42 the remote locomotive should the need arise. Methods for use of the remote
43 locomotive are described in this chapter as this represents the normal
44 placement and removal of railcars at the PUREX Storage Tunnels. Should
45 storage activities require the use of a mechanical means other than the remote
46 locomotive to place or withdraw a railcar, methods for that application will
47 be developed.

48
49 Preparatory activities associated with the remote-controlled locomotive
50 included the following:

- 1 • Charging the batteries for both the locomotive and the radio
2 transmitter
- 3 • Performing operational checks
- 4 • Installing a plastic shroud over the locomotive to facilitate
5 decontamination
- 6 • Installing an anticoupling device on the south coupler of the
7 locomotive (storage only)
- 8 • Performing physical inspections of the railroad track within the
9 railroad tunnel to ensure that the track switches are positioned
10 properly and the track is clear of obstructions.

11 **4.1.1.2 Water-Fillable Door Preparation.** Each PUREX Storage Tunnel has a
12 water-fillable door that isolates the storage area from the PUREX railroad
13 tunnel. (Chapter 2.0 provides a description of the door.)

14 Currently, the water-fillable door to Tunnel Number 2 is empty and is not
15 expected to be filled. Operational checks are performed on the door hoists.
16 Before performing operational checks on the water-fillable door, the operator
17 confirms with a dispatcher that the railroad tunnel area is clear of
18 personnel.

19 **4.1.1.3 Other Preparation Tasks.** Before material storage, the following
20 preparatory tasks are completed.

- 21 • The storage tunnel exhaust fan is verified to be operating.
- 22 • Labels will be attached to the railcar in accordance with
23 WAC 173-303-395(6) and 173-303-630(3) if the material contains
24 dangerous waste components.

35 **4.1.2 Tunnel Storage Activities**

36 This section describes the placement of material within the PUREX Storage
37 Tunnels.

38 **4.1.2.1 Physical Characterization of Material to be Stored.** Physical
39 characterization includes an evaluation of the following physical properties:

- 40 • Length, width, and height
- 41 • Gross weight and volume
- 42 • Preferred orientation for transport and storage
- 43 • Presence of mixed waste.

44 Information sources used in physical characterization include equipment
45 fabrication and installation drawings, operational records, and process
46 knowledge. Physical characterization provides information necessary to

1 appropriately describe the mixed waste materials. Such information also is
2 used to design and fabricate, if required, supports on the railcar.
3

4 Specific material known to contain constituents that would cause the
5 equipment to be designated as mixed waste is discussed in the waste analysis
6 plan (Appendix 3A). The material includes but is not limited to dissolvers
7 that contain elemental mercury; silver reactors that contain silver salts;
8 jumpers and other equipment that have elemental lead counterweights; a
9 concentrator that contains chromium; neutron absorbing equipment containing
10 cadmium. Characteristics of these materials when stored as mixed waste are
11 described in Chapter 3.0. Waste transferred to the PUREX Storage Tunnels from
12 other than PUREX Plant also would be physically characterized.
13

14 **4.1.2.2 Material Flushing.** Before removal from service, the material from
15 the PUREX Plant was flushed to minimize loss of products, to reduce
16 radioactive contamination, and to reduce to nonregulatory levels the
17 concentration of any dangerous chemicals present in a residual heel. In the
18 future the analysis of the rinsate will be used to determine when these goals
19 have been achieved. The analysis of the final flush will be retained as part
20 of the PUREX Storage Tunnel records. Material removed from other onsite units
21 will be prepared for transfer to the tunnels in accordance with this dangerous
22 waste permit application.
23

24 **4.1.2.3 Railcar Preparation.** Railcars are modified to serve as dedicated
25 storage platforms and transporters for material placed in the PUREX Storage
26 Tunnels. The wooden decking on the railcars is removed to minimize the amount
27 of combustible material placed in the PUREX Storage Tunnels. The south
28 coupler is disabled or removed to prevent the railcar from coupling to the
29 railcar stored ahead. Brakes are disabled to ensure free wheeling of the
30 railcar. Steel decking, catch pans filled with absorbent, and equipment
31 cradles are provided as needed to modify the railcar for its specific task.
32

33 **4.1.2.4 Placement of Material into Storage Position.** With all preparations
34 complete and with the approval of cognizant management, transferring material
35 to the PUREX Storage Tunnels proceeds as follows.
36

- 37 • The water-fillable door to the storage tunnel is opened.
38
- 39 • The railcar is loaded as specified in the storage tunnel checklist.
40
- 41 • An inventory of items loaded on the railcar and a record of their
42 location on the railcar are recorded in the storage tunnel checklist.
43
- 44 • A health physics technician obtains a radiation level survey of the
45 loaded railcar at a distance commensurate with ALARA practices.
46
- 47 • The railcar is pushed into the storage tunnel to its storage position.
48
- 49 • Once the railcar is in position, the water-fillable door is closed.
50
- 51

1 4.1.3 Removal of Stored Material

2
3 Removal of material stored within the PUREX Storage Tunnels is not
4 conducted routinely. It is planned that the material will remain in storage
5 until a means to accommodate processing and repackaging of the material for
6 disposal or further storage or until another final disposition option becomes
7 available. Removal of material from storage within the PUREX Storage Tunnels
8 would proceed after the preparation activities identified in Section 4.1.1.

9
10 With all preparations complete and approval of management, removal of
11 material from the storage area of the PUREX Storage Tunnels would proceed as
12 follows.

13
14 • The equipment that will be used to remove material is positioned in
15 the PUREX railroad tunnel.

16
17 • Verification is made that the PUREX railroad tunnel is configured
18 properly to proceed with entrance into the PUREX Storage Tunnels
19 (i.e., tunnel ventilation system is operating, the overhead door is
20 closed and the health physics technician has performed a radiation
21 survey of the area.

22
23 • The water-fillable door is opened.

24
25 • The equipment that will be used to remove material is moved into the
26 storage tunnel and connected to the railcar.

27
28 • Verification is made that the railcar is connected to the removal
29 equipment and the railcar is extracted from the storage tunnel and
30 positioned within the PUREX railroad tunnel.

31
32 • The water-fillable door is closed.

33
34 The loaded railcar retrieved from the tunnel would be remotely viewed and
35 radiation measurements may be obtained to determine the possibility of mixed
36 waste containment failure during storage in the PUREX Storage Tunnels. If
37 evidence of containment failure is detected, the specific details (i.e.,
38 material, location on railcar, storage position) would be documented and
39 attached to the waste tracking form. This information would be maintained in
40 the files and would be used to establish sampling locations within the tunnels
41 at closure. After remote viewing and radiation surveys, the railcar and
42 associated material may be prepared as required for transfer to an appropriate
43 onsite TSD unit for treatment or further storage.

44
45 4.1.4 Filling the Water-Fillable Door (Tunnel Number 2)

46
47 If radiation shielding beyond that provided by the empty water-fillable
48 door becomes necessary, the door can be filled with water. In the past, this
49 was accomplished by connecting a fire hose from the water hydrant to the wall
50 stub on the exterior of the door housing (Figure 4-1). Once the fire hose was
51 in place, the hydrant valve was opened and the door was filled with water.

1 The hydrant was closed by personnel when a high-level indicator light
2 illuminated. Although attendance by an operator is required at all times
3 during filling operations, should the door overfill, excess water is channeled
4 through a vent/spill pipe to the door sump. A 15.2-centimeter drain is
5 provided in each door sump. Water accumulated in the door sump was pumped out
6 to the Double-Shell Tank System, and the sump and drain were made inoperable
7 during PUREX Facility deactivation activities. The drain was sealed during
8 PUREX Facility deactivation. In the future, a temporary source of water could
9 be provided for filling the water-fillable door.

10

11

12 4.1.5 Poststorage Activities

13

14 The following poststorage activities would conclude the tunnel storage
15 task.

16

17 • Decontamination activities, if required, are performed.
18 • Management is notified of any unusual conditions observed during the
19 storage/retrieval activities.
20

21

22

23 4.1.6 Operation of the Tunnel Ventilation System

24

25 The ventilation systems for Tunnel Number 1 and Tunnel Number 2 were
26 designed to ventilate air from within the tunnels so the airborne radioactive
27 contamination is vented through a HEPA filtered exhaust system.
28

29 4.1.6.1 Tunnel Number 1 Ventilation. Active ventilation of Tunnel Number 1
30 presently is not provided. After placement of the last railcar into Tunnel
31 Number 1, the tunnel was sealed (Chapter 2.0). As part of the sealing
32 activities, the ventilation fan was deactivated electrically and the exhaust
33 stack and filter were isolated from the system by installing blanks upstream
34 and downstream of both the exhaust fan and filter and the stack was removed.
35 In the event railcar removal activities are initiated, it is planned that the
36 ventilation system would be reactivated. Operation of the ventilation system
37 would be similar to that for Tunnel Number 2.
38

39 4.1.6.2 Tunnel Number 2 Ventilation. The Tunnel Number 2 ventilation system
40 presently is inactive. As part of PUREX Facility deactivation, the water-
41 fillable door and outer PUREX railroad tunnel door were sealed. The seal may
42 be temporary or permanent depending on the future need for storing waste in
43 the tunnel. The ventilation system may be operated continuously, or
44 de-energized and reactivated during waste placement activities. During
45 deactivation, a blank was installed on the downstream side of the filter and
46 the stack was capped. When the determination has been made that Tunnel
47 Number 2 will no longer receive waste, the ventilation system will be blanked
48 and deactivated electrically similar to the Tunnel Number 1 ventilation
49 system. While the Tunnel Number 2 ventilation system is operating and the
50 water-fillable door is closed, the exhaust system, which discharges
51 approximately 100 cubic meters per minute, maintains a slightly negative
52 pressure in the tunnel. The exhaust air is replaced by infiltration around

1 the water-fillable door and through the porosity of the tunnel structure.
2 (e.g., the rail-bed ballast). When the water-fillable door is open (during
3 transfer activities), inward airflow is maintained through the open doorway.
4 This inward airflow channels airborne radioactive contamination away from both
5 the railroad tunnel and personnel following railcars (if allowed) into the
6 storage tunnel. A HEPA filter provides filtration of all exhaust air before
7 release to the atmosphere. When the ventilation system is operating, the HEPA
8 filter is tested in place at least annually to ensure radioactive particulate
9 removal efficiency. Exhausted air is sampled periodically and analyzed for
10 airborne radionuclides.

11

12

13 4.2 CONTAINERS [D-1]

14

15 This section describes the various types of containment used to isolate
16 mixed waste stored in the PUREX Storage Tunnels. The PUREX Storage Tunnels
17 are considered to be a miscellaneous unit most closely resembling that of a
18 container storage unit. The mixed waste stored in the PUREX Storage Tunnels
19 is contained and is not considered a risk to human health or to the
20 environment.

21

22

23 4.2.1 Containers with Free Liquids

24

25 The only mixed waste stored as a free liquid is elemental mercury.
26 A small quantity, less than 1.7 liters, of mercury is contained in each of the
27 two thermowells attached to and contained within each dissolver (Chapter 3.0).
28 Primary containment of the mercury is provided by the all-welded construction
29 of the thermowell itself, which is fabricated from 7.6-centimeter,
30 Schedule 80, 304L stainless steel pipe. The open upper end of the thermowell
31 was plugged with a 304L stainless steel nozzle plug in preparation for
32 storage. The dissolver rests on a cradle on its railcar in an inclined
33 position. This ensures that the mercury remains in the lower portion of the
34 thermowell and is not in contact with the mechanical closure on the nozzle end
35 of the thermowell.

36

37 A secondary containment barrier for mercury, should it leak from the
38 thermowell, is provided by the dissolver itself. The dissolver is a
39 304L stainless steel process vessel constructed from 1-centimeter-thick plate
40 and is approximately 2.7 meters in diameter. The dissolver is of all-welded
41 construction and contains no drains or nozzle outlets in the bottom several
42 feet of its lower section, which contains both thermowells.

43

44 The 304L stainless steel used to contain the elemental mercury is both
45 compatible with the waste itself and the storage environment. The potential
46 for significant deterioration of either the primary or secondary containment
47 barrier material before closure is considered to be negligible.

48

49 The dissolvers stored within the PUREX Storage Tunnels are not labeled
50 as containing characteristic toxic mercury (D009) [WAC 173-303-090(8)(c)].
51 Procedures for labeling were not in place at the time of storage. Personnel
52 access into the storage area for purposes such as labeling is not feasible

1 because of the radiation levels and cannot be justified under ALARA
2 guidelines. Based on ALARA, mixed waste presently within the PUREX Storage
3 Tunnels will remain unlabeled. However, during future transfers of mixed
4 waste into the PUREX Storage Tunnels the railcars will be labeled as specified
5 by WAC 173-303-395(6) and WAC 173-303-630(3).
6
7

8 **4.2.2 Containers Without Free Liquids That Do Not Exhibit Ignitability
9 or Reactivity**

10 Most lead is fully contained in all-welded encasements of either carbon
11 steel or 304L stainless steel (refer to Table 1 in Appendix 3A). The
12 encasement serves as support, protection against mechanical damage, and
13 protection of the lead from exposure to the environment. Also, lead has been
14 placed in burial boxes of appropriate size. The boxes provide secondary
15 containment for the lead in the unlikely event the primary encasement should
16 fail. Although boxes may be open on the top, the PUREX Storage Tunnels are
17 enclosed; therefore, the containers are protected from the elements.
18
19

20 Both carbon steel and 304L stainless steel used to encase the lead are
21 compatible with the waste and the storage environment. Significant
22 deterioration of either the primary or secondary containment barrier materials
23 before closure is not considered to be credible.
24

25 In the past, material that contains lead or that has encased lead
26 attached was not labeled as containing characteristic toxic lead
27 (D008) [WAC 173-303-090(8)], because the requirements were not yet on line.
28 As stated in Section 4.2.1, personnel entry into the tunnel storage area for
29 purposes of labeling would be inconsistent with ALARA guidelines. However,
30 during future storage of material containing lead the railcars will be labeled
31 in accordance with WAC 173-303-395(6) and WAC 173-303-630(3).
32
33

34 **4.2.3 Protection of Extremely Hazardous Waste in Containers**

35 The present amount of mixed waste stored in the PUREX Storage Tunnels is
36 sufficient to characterize this material as extremely hazardous waste.
37 Because the PUREX Storage Tunnels are enclosed totally, protective covering
38 from the elements and from run-on is provided for the storage of extremely
39 hazardous waste. Periodic inspection of the equipment stored in the PUREX
40 Storage Tunnels is not feasible because of radiation levels in excess of
41 5 roentgen per hour. Safe management of this waste is based on the following
42 considerations.
43

44

- 45 • The operation of the PUREX Storage Tunnels is passive, i.e., once a
46 storage position is filled, the storage position remains undisturbed
47 until closure.
- 48 • The extremely hazardous waste is compatible with its storage container
49 and the storage environment.

1 4.2.4 Prevention of Reaction of Ignitable, Reactive, and Incompatible
2 Waste in Containers
3

4 There is no reactive or incompatible waste known to be stored in the
5 PUREX Storage Tunnels. The only mixed waste stored in the PUREX Storage
6 Tunnels considered an ignitable waste is the silver nitrate in Tunnel
7 Number 2. The silver nitrate fraction of the silver salts, within the silver
8 reactors, exhibits the characteristic of ignitability as defined in
9 49 CFR 173.127(a). Therefore, the silver salts are managed as an ignitable
10 dangerous waste in accordance with WAC 173-303-395.

11
12 The risk of fire associated with the storage of silver nitrate in the
13 PUREX Storage Tunnels is considered to be extremely low. This conclusion is
14 based on the following considerations.

- 16 • The operation of the PUREX Storage Tunnels is passive; i.e., once a
17 storage position is filled, the storage position remains undisturbed
18 until closure.
- 20 • The silver nitrate is contained within large, heavy-walled stainless
21 steel vessels that isolate the silver nitrate from contact with any
22 combustibles that might be in the tunnels.
- 24 • The silver nitrate is dispersed over a large surface area on a ceramic
25 packing substraight and is not conducive to build-up of heat that
26 could lead to spontaneous combustion.
- 28 • Personnel access to the occupied areas of the tunnels is not
29 permitted, thereby precluding activities that could present a fire
30 hazard (e.g., smoking, flame cutting, welding, grinding, and other
31 electrical activities).

33 Although ignitable waste storage units are required by
34 WAC 173-303-395(1)(d) to have inspections conducted at least yearly by a fire
35 marshall or professional fire inspector familiar with the requirements of the
36 uniform fire code, the radiation levels within the PUREX Storage Tunnels make
37 such inspections impractical. These inspections are not considered
38 appropriate or necessary for the safe operation of the unit because of the
39 nature of the ignitable waste, the means of storage, and ALARA concerns
40 (Chapter 6.0, Section 6.2).

41

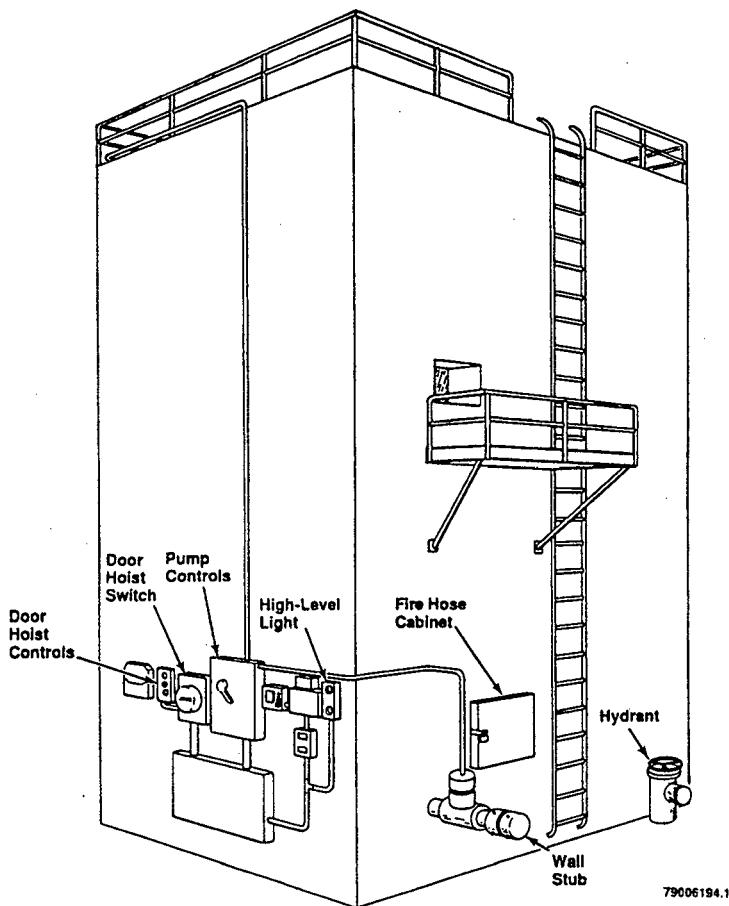


Figure 4-1. Water-Fillable Door Exterior (Tunnel Number 2).

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CONTENTS

5.0 GROUNDWATER MONITORING FOR LAND-BASED UNITS [D-10] 5-1

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1 **5.0 GROUNDWATER MONITORING FOR LAND-BASED UNITS [D-10]**

2
3
4 The PUREX Storage Tunnels are not operated as a dangerous waste surface
5 impoundment, waste pile, land treatment unit, or a landfill as referenced in
6 WAC 173-303-645(1)(a). Therefore, groundwater monitoring is not required.

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1 **6.0 PROCEDURES TO PREVENT HAZARDS [F]**

2

3

4 This chapter discusses security; inspection schedules; preparedness and
5 prevention requirements; preventative procedures, structures and equipment;
6 and prevention of reaction of ignitable, reactive, and incompatible waste
7 stored in the PUREX Storage Tunnels.

8

9

10 **6.1 SECURITY [F-1]**

11

12 The following sections describe the security measures, equipment, and
13 warning signs used to control entry into the PUREX Storage Tunnels. Hanford
14 Facility security measures are discussed in the General Information Portion
15 (DOE/RL-91-28).

16

17

18 **6.1.1 Security Procedures and Equipment [F-1a]**

19

20 The following sections describe the 24-hour surveillance system, barrier,
21 and warning signs used to provide security and control access to the PUREX
22 Storage Tunnels.

23

24 **6.1.1.1 24-Hour Surveillance System.** The entire Hanford Facility is a
25 controlled access area. For surveillance information refer to the General
26 Information Portion (DOE/RL-91-28).

27

28 **6.1.1.2 Barrier and Means to Control Entry.** The PUREX Storage Tunnels are
29 protected by the 200 East Area fence and building structures to enhance
30 physical security. Visitors are required to be escorted. Personnel wishing
31 to enter either storage tunnel must be qualified radiation zone workers and
32 must obtain appropriate approval on a need-to-enter basis. Entry into either
33 storage tunnel is made from the PUREX Plant compound or from outside the
34 railroad tunnel. Actual access into the active portion, the storage area, of
35 the storage tunnels can be made only through the north entry after the
36 massive, water-fillable doors are raised. The water-fillable doors normally
37 are closed and require operations approval, as well as mechanical assistance,
38 to open.

39

40 **6.1.1.3 Warning Signs.** Points of access to the PUREX Storage Tunnels are
41 posted with a sign, printed in English, reading "DANGER-UNAUTHORIZED PERSONNEL
42 KEEP OUT," or an equivalent legend, in black and red letters on a white
43 background, in accordance with requirements of WAC 173-303-310(2)(a). In
44 addition to these signs, the 200 East Area fence is posted with signs warning
45 against unauthorized entry. The signs also are visible from all angles of
46 approach, from a distance of at least 7.6 meters.

1 6.1.2 Waiver [F-1b]

2 A waiver of the security procedures and equipment requirements for the
3 PUREX Storage Tunnels is not requested. Therefore, the requirements of
4 WAC 173-303-310(1)(a) and (b) are not applicable to the PUREX Storage Tunnels.

5 6.2 INSPECTION PLAN [F-2]

6 Because waste within the PUREX Storage Tunnels is inaccessible because of
7 the levels of radiation present (levels that exceed 5 roentgen per hour in
8 certain areas of the tunnels), inspection of the tunnel interior will not be
9 performed. External inspections of the tunnels only will be performed
10 annually. The inspection schedules and inspection reports will be maintained
11 with the tunnel storage records. Inspection records will be maintained for a
12 minimum of 5 years.

13 Information from inspections is recorded on inspection reports. The
14 report forms are used to initiate corrective action if necessary. The
15 following identifies types of inspections that occur at the PUREX Storage
16 Tunnels.

17 • External surfaces of the PUREX Storage Tunnels are observed for
18 evidence of structural deterioration. Tunnel subsidence, erosion of
19 the earth cover, and vent stack damage are of primary concern.
20 Abnormal conditions are recorded, evaluated, and corrective action
21 initiated as necessary.

22 • The points of access to the PUREX Storage Tunnels are inspected to
23 ensure warning signs (Section 6.1.3) are in place, visible, and
24 legible. Abnormal conditions are recorded, evaluated, and corrective
25 action will be initiated as necessary.

26 6.3 PREPAREDNESS AND PREVENTION REQUIREMENTS [F-3]

27 The following sections document the preparedness and prevention
28 measures taken at the PUREX Storage Tunnels.

29 6.3.1 Equipment Requirements [F-3a]

30 The following sections describe the internal and external communications
31 systems and emergency equipment required.

32 6.3.1.1 Internal Communications. The PUREX Storage Tunnels are not occupied
33 and personnel entry is allowed only on a very limited basis and under close
34 supervision. Normal and emergency communications equipment (portable two-way
35 radios) is available for use.

36 6.3.1.2 External Communications. External communications equipment for
37 summoning emergency assistance from the Hanford Fire Department and/or

1 emergency response teams are provided by two-way portable radios or other
2 devices.

3
4 **6.3.1.3 Emergency Equipment.** Equipment included in the emergency plan for
5 the PUREX Storage Tunnels is provided in Appendix 7A.

6
7 **6.3.1.4 Water for Fire Control.** The fire hazard associated with the
8 operation of the PUREX Storage Tunnels is considered to be very low because of
9 the minimal amount of combustibles stored within the tunnels and the lack of
10 an ignition source (Rambosek and Foster 1972). In the event it is determined
11 there is a fire in the storage area of the tunnels, the contingency plan will
12 be activated. Because of the potential of the mixed waste stored within the
13 tunnels to leach, the use of water for fire control will be avoided if
14 possible. Reduction of the air supply to the storage area by isolation of the
15 tunnel exhaust system, if operating, should permit the fire to
16 self-extinguish. Should the fire continue to propagate, heavy equipment and
17 cranes will be called to the scene to cover areas of the tunnels that might
18 collapse. Heavy equipment and cranes are readily available on the Hanford
19 Facility at all times and generally are available for deployment to the scene
20 of an emergency within 1 hour. In the event that a fire resulted in the
21 collapse of the tunnels, a recovery plan will be developed in accordance with
22 emergency response procedures included in Appendix 7A. The recovery plan will
23 take into consideration plans, if any, for retrieval of the waste stored
24 within the tunnel(s).

25
26 **6.3.2 Aisle Space Requirement [F-3b]**

27 Requirements for aisle space are not considered appropriate for the safe
28 operation of the PUREX Storage Tunnels and were not included in design
29 documents.

30
31 **6.4 PREVENTIVE PROCEDURES, STRUCTURES, AND EQUIPMENT [F-4]**

32
33 The following sections describe preventive procedures, structures, and
34 equipment.

35
36 **6.4.1 Unloading Operations**

37 Operation of the PUREX Storage Tunnels does not involve the loading or
38 unloading of dangerous waste. All loading and unloading operations are
39 conducted at the PUREX Facility or other onsite units. Therefore, the
40 requirements of WAC 173-303-806(4)(a)(viii)(A) are not applicable to the PUREX
41 Storage Tunnels.

42
43 **6.4.2 Run-Off**

44 The design of the PUREX Storage Tunnels included consideration and
45 provisions for the control of run-off and run-on. Construction of both

1 tunnels included the application of a moisture barrier before placement of the
2 soil overburden. On Tunnel Number 1, 40.8-kilogram mineral surface roofing
3 was applied to the external surfaces of the structural timbers (top and
4 sides). The roofing material was nailed in place with an overlap of
5 approximately 10 centimeters at all joints and seams. All interior and
6 exterior steel surfaces of Tunnel Number 2 were coated with at least a
7 0.9 millimeter bituminous, solvent coal tar base, coating compound. The
8 coating was applied using a two-coat system, with each coat not less than
9 0.45 millimeter, ensuring a total dry film thickness of not less than
10 0.9 millimeter.

11
12 The soil overburden covering the PUREX Storage Tunnels also is contoured
13 to provide a sideslope of 2 (horizontal) to 1 (vertical). This construction
14 serves to divert any seasonal or unanticipated run-on away from the storage
15 area of the PUREX Storage Tunnels. For potential situations where a natural
16 catastrophic event occurs, inspections of the tunnel sideslopes are conducted
17 to ensure the contours remain in a condition that ensures proper run-off and
18 continues to divert run-on away from the tunnel storage areas. Further
19 discussion of the design of the PUREX Storage Tunnels is provided in
20 Chapter 2.0.

21
22 Run-on at the PUREX Storage Tunnels is controlled by the design features
23 of the exterior of the tunnels that serve to divert run-on away from the
24 interior of the tunnels. Additionally, all waste within the tunnels is stored
25 well above the floor level on railcars. The control of run-on combined with
26 the storage of all waste above the floor elevation provides adequate assurance
27 that run-off will not occur at the PUREX Storage Tunnels.

28
29
30 **6.4.3 Water Supplies**

31
32 Water was supplied to the PUREX Storage Tunnels from the PUREX Plant.
33 This water was used for the sole purpose of filling the water-fillable doors
34 should it have been determined necessary. There are no other sources or uses
35 of water at the PUREX Storage Tunnels. The line that supplied water to the
36 PUREX Storage Tunnels was blanked and emptied during deactivation activities.
37 In the future, a temporary source of water would be provided for filling the
38 water fillable door.

39
40
41 **6.4.4 Equipment and Power Failures**

42
43 The procedures, structures, and equipment used to mitigate the effects of
44 equipment failure and power outage are described in the following sections.

45
46 **6.4.4.1 Mitigation of the Effects of Equipment Failure.** Maintaining safe
47 storage of materials in the PUREX Storage Tunnels is not contingent on
48 continued operation of equipment. The operable equipment associated with the
49 PUREX Storage Tunnels were the remote-controlled locomotive or waste placement
50 and removal equipment, the railcars, and the water-fillable door and
51 ventilation system for both tunnels. No operable equipment is associated with
52 either tunnel, as these tunnels have been sealed and may no longer receive

1 dangerous waste. Backup or redundant systems are not provided for either
2 tunnel, as failure of the equipment would not have the potential to result in
3 a release of dangerous waste to the environment. There are no hazards
4 associated with tunnel equipment failure.

5
6 **6.4.4.2 Mitigation of the Effects of Power Failure.** Maintaining safe storage
7 of materials in the PUREX Storage Tunnels is not contingent on continued
8 supply of electrical power. Electrical power is required to operate the
9 water-fillable door and the ventilation fan in both tunnels. Back-up or
10 redundant ventilation systems are not provided as the system is operated only
11 to maintain air balance and provide secondary control of radioactive airborne
12 particulate. Power failure to either tunnel would not have the potential to
13 result in the release of dangerous waste or radioactive material to the
14 environment. There are no hazards associated with the shutdown of the tunnel
15 ventilation systems due to loss of electrical power.

16
17
18 **6.4.5 Personnel Protection Equipment**

19
20 Personnel entering the PUREX Storage Tunnels are required to wear special
21 protective clothing and respiratory protection at all times because of the
22 radioactive material stored in the PUREX Storage Tunnels. Protective clothing
23 and full-face respirators with filters are considered to be sufficient
24 protection from the dangerous waste stored within the PUREX Storage Tunnels.
25 Personnel are trained and qualified in using the protective equipment and are
26 checked routinely for mask fit.

27
28
29 **6.5 PREVENTION OF REACTION OF IGNITABLE, REACTIVE, AND/OR INCOMPATIBLE**
30 **WASTE [F-5]**

31
32 There is no reactive or incompatible waste stored in the PUREX Storage
33 Tunnels. The only ignitable waste stored within the tunnels is silver
34 nitrate. The silver nitrate is present within the silver reactors (deposited
35 on unglazed ceramic packing) stored in Tunnel Number 2.

36
37 Although silver nitrate exhibits the characteristic of ignitability, it
38 is contained within stainless steel vessels, stored on railcars above the
39 floor level, and isolated from combustible materials and other dangerous
40 waste. Additional measures to prevent reaction of the ignitable waste are not
41 considered necessary.

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11 7A UNIT-SPECIFIC CONTINGENCY PLAN FOR THE 218-E-14 AND
12 218-E-15 STORAGE TUNNELS APP 7A-i

APPENDIX

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1 **7.0 CONTINGENCY PLAN [G]**

2
3
4 The WAC 173-303 requirements for contingency plans are satisfied in the
5 following documents: the *Unit-Specific Contingency Plan for the 218-E-14 and*
6 *218-E-15 Storage Tunnels* (Appendix 7A) and the *Hanford Facility Contingency*
7 *Plan* [Attachment 4 of the Hanford Facility RCRA Permit (Dangerous Waste
8 Portion)].

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APPENDIX

8A 8A DANGEROUS WASTE TRAINING PLAN FOR THE PUREX FACILITY APP 8A-i

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1 **8.0 PERSONNEL TRAINING [H]**

2
3
4 The training plan provided in Appendix 8A discusses training requirements
5 pertaining to the PUREX Storage Tunnels.

6
7 The training program is designed to be compliant with all applicable
8 federal, state, and DOE-RL training requirements. The training program
9 complies with requirements contained within WAC 173-303-330 for the
10 development of a written dangerous waste training program. The training
11 program is designed to prepare personnel to manage and maintain TSD units in a
12 safe, effective, efficient, and environmentally sound manner. In addition to
13 preparing employees to manage and maintain TSD units under normal conditions,
14 the training program ensures that employees are prepared to respond in a
15 prompt and effective manner should abnormal or emergency conditions occur.

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1 CONTENTS

2 3 4 9.0 EXPOSURE INFORMATION REPORT 9-1

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1 **9.0 EXPOSURE INFORMATION REPORT**

2
3
4 The PUREX Storage Tunnels do not store, treat, or dispose of hazardous
5 waste in a surface impoundment or a landfill as defined in 40 CFR 270.10 and
6 RCRA, Section 3019. Therefore, exposure information is not required.

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CONTENTS

10.0 WASTE MINIMIZATION [D-9] 10-1

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1 **10.0 WASTE MINIMIZATION [D-9]**

2
3
4 To fulfill the requirements of 40 CFR 264.73(b)(9), a certification form
5 that the PUREX Storage Tunnels have a waste minimization/pollution prevention
6 program in place will be entered, annually, into the PUREX Storage Tunnels
7 operating record.

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11.0 CLOSURE AND FINANCIAL ASSURANCE [I]

4 Closure of the PUREX Storage Tunnels requires coordination with closure
5 of the PUREX Plant to ensure a cost effective closure for both units. In
6 addition, the highly radioactive nature of the mixed waste located within the
7 PUREX Plant and PUREX Storage Tunnels precludes the determination of the type
8 of treatment and/or disposition of the waste at this time.

10 The PUREX Storage Tunnels will be managed as a RCRA storage unit until
11 closure can be coordinated with the final closure plan for the PUREX Plant.
12 The PUREX Storage Tunnels closure plan will be submitted after any required
13 *National Environmental Policy Act of 1969* documentation and land usage
14 agreements, which initiate disposition and aid in identifying or developing
15 necessary disposition activities, have been adopted. The PUREX Storage
16 Tunnels closure plan will be submitted for Ecology approval with the PUREX
17 Plant closure plan.

18 The PUREX Storage Tunnels closure plan will be written to meet the
19 requirements of WAC 173-303-140 and WAC 173-303-610. This closure plan might
20 consider but will not be limited to the following options for either in situ
21 disposal or retrieval/clean closure of this unit.

22 Federal facilities are not required to comply with WAC 173-303-620 as is
23 stated in the regulations and as described in Condition II.H.3. of the
24 Dangerous Waste Portion of the Hanford Facility RCRA Permit (Ecology 1994).

11.1 IN SITU DISPOSAL OPTIONS

31 This closure plan might consider but will not be limited to the following
32 options for in situ disposal of waste in this unit.

11.1.1 Backfilling the PUREX Storage Tunnels with Gravel

37 This option could involve backfilling the tunnels with gravel to
38 eliminate void space and prevent ground subsidence. A modified commercially
39 available centrifugal rock throwing device could be placed in newly
40 constructed risers evenly spaced along each tunnel roof. Fill material could
41 be supplied and dispersed into the tunnels by automated controls. Following
42 the fill process, all equipment could be removed from the tunnel roofs and all
43 means of access to the tunnels could be permanently sealed. Final activities
44 could involve the construction of a final surface barrier that meets RCRA
45 landfill cover requirements to prevent water from leaching mixed waste
46 contained in the tunnels.

11.1.2 Injecting the PUREX Storage Tunnels with Grout

52 This option could involve the injection of grout material into each
53 tunnel to stabilize and immobilize contained materials and prevent ground

1 subsidence. A grout injector could be alternately placed in newly constructed
2 risers evenly spaced along each tunnel roof. Grout material could be supplied
3 and dispersed into the tunnels by automated controls. The grout material
4 could be injected in lifts to accommodate curing and heat dissipation normally
5 associated with the use of this type of material. Final activities could
6 involve the construction of a final surface barrier that meets RCRA landfill
7 cover requirements to prevent water from leaching mixed waste contained in the
8 tunnels.

9

10 11.1.3 Combination of Grout Injection and Backfilling

11

12 This options combines grout injection with gravel backfilling similar to
13 the processes discussed previously. Grout could be injected first to fill
14 void spaces under the railcars and provide a basal structure. Gravel could be
15 dispersed to fill remaining void space and prevent ground subsidence. Final
16 activities could involve the construction of a final surface barrier that
17 meets RCRA landfill cover requirements to prevent water from leaching mixed
18 waste contained in the tunnels.

19

20

21 22 11.2 RETRIEVAL/CLEAN CLOSURE OPTIONS

23

24 This closure plan might consider but will not be limited to the following
25 options for retrieval/clean closure of this unit.

26

27 28 11.2.1 Retrieval and Disposal in the PUREX Plant

29

30 Railcars stored in both tunnels could be remotely retrieved one at a time
31 and moved beneath the horizontal door of the railroad tunnel extension for
32 remote viewing, and if possible, characterization. Transfer procedures could
33 be initiated to move waste material from the railcars to the PUREX Plant
34 canyon deck area. Following transfer of the waste material, the railcars
35 could be decontaminated and removed for final disposition at other onsite
36 units. Final disposition of the waste transferred to the canyon deck area
37 could be in accordance with PUREX Plant closure documentation. The PUREX
38 Storage Tunnels could be closed after submittal and implementation of a PUREX
39 Storage Tunnel's closure plan in conjunction with PUREX Plant closure
40 documentation. The PUREX Storage Tunnels closure plan will detail
41 verification sampling and analysis to be performed as a part of closure
42 activities.

43

44 45 11.2.2 Retrieval and Physical Processing (size reduction) in the
46 PUREX Plant and Subsequent Disposal

47

48 Retrieval of waste material stored in the tunnels could be similar to
49 that described in the previous section. Once the waste material was
50 transferred to the PUREX Plant canyon deck area, characterization and size
51 reduction of waste material could proceed. An area located on the canyon deck.
52 or in a process cell could be modified to include all necessary equipment to

1 perform characterization and size reduction activities. Size reduction could
2 be performed through various technologies that include, but are not limited
3 to, flame cutting, water jet cutting, sawing, or other technologies. Final
4 disposition of the processed waste material either onsite or offsite could be
5 in accordance with regulations and procedures in place at that time. The
6 PUREX Storage Tunnels could be closed after submittal and implementation of a
7 PUREX Storage Tunnels closure plan in conjunction with PUREX Plant closure
8 documentation. The PUREX Storage Tunnels closure plan will detail
9 verification sampling and analysis to be performed as a part of closure
10 activities.

11

12

13 **11.2.3 Construction of a New Facility for Retrieval, Processing, and**
14 **Treatment of Equipment for Disposal**

15

16 This option involves the construction of a new unit that is either mobile
17 or stationary to excavate, retrieve, and treat waste material stored in the
18 tunnels. The unit could be constructed in a manner consistent with the
19 retrieval and handling requirements for large, contaminated waste material.
20 Following retrieval, the waste material could be treated in accordance with
21 final onsite or offsite disposition requirements identified at such time. The
22 excavated tunnels could have a temporary surface barrier placed in position
23 until verification and sampling analysis could be performed as a part of
24 closure activities to be performed in conjunction with PUREX Plant closure.

25

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| 4 | 12.0 REPORTING AND RECORDKEEPING 12-1 |
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12.0 REPORTING AND RECORDKEEPING

4 Reporting and recordkeeping requirements that could be applicable to the
5 Hanford Facility are described in Chapter 12.0 of the General Information
6 Portion (DOE/RL-91-28). Not all of these requirements and associated reports
7 and records identified in Chapter 12.0 of the General Information Portion are
8 applicable to the PUREX Storage Tunnels. Those reporting and recordkeeping
9 requirements determined to be applicable to the PUREX Storage Tunnels are
10 summarized as follows:

- Hanford Facility Contingency Plan and incident records (as identified in the General Information Portion):
 - Immediate reporting
 - Written reporting
 - Shipping paper discrepancy reports.
- Unit-specific Part B permit application documentation and associated plans
- Personnel training records
- Inspection records (unit)
- Onsite transportation documentation
- Land disposal restriction records
- Waste minimization and pollution prevention.

In addition, the following reports prepared for the Hanford Facility will contain input, when appropriate, from the PUREX Storage Tunnels:

- Quarterly Hanford Facility RCRA Permit modification report
- Anticipated noncompliance
- Required annual reports.

Annual reports updating projections of anticipated costs for closure and postclosure will be submitted when the PUREX Storage Tunnels closure plan is submitted with the PUREX Plant closure plan for Ecology approval (Chapter 11.0).

The PUREX Tunnels Operating Record 'records contact' is kept on file in the General Information file of the Hanford Facility Operating Record (refer to Chapter 12.0, DOE/RL-91-28).

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1 CONTENTS

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4 13.0 OTHER FEDERAL AND STATE LAWS [J] 13-1
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1 13.0 OTHER FEDERAL AND STATE LAWS [J]
2
3

4 Other federal and state laws and local requirements applicable to the
5 PUREX Storage Tunnels (*Atomic Energy Act of 1954*, *Clean Air Act Amendments of*
6 *1990*, *Toxic Substances Control Act of 1976*, *State Environmental Policy Act of*
7 *1971*, *Federal Facilities Compliance Act of 1992*, and the *Federal Insecticide,*
8 *Fungicide, and Rodenticide Act of 1975*) are discussed in Chapter 13.0 of the
9 General Information Portion (DOE/RL-91-28).

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14.0 PART B CERTIFICATION [K] 14-1

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1 14.0 PART B CERTIFICATION [K]
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I certify under penalty of law that this document and all attachments
were prepared under my direction or supervision in accordance with a system
designed to assure that qualified personnel properly gather and evaluate the
information submitted. Based on my inquiry of the person or persons who
manage the system, or those persons directly responsible for gathering the
information, the information submitted is, to the best of my knowledge and
belief, true, accurate, and complete. I am aware that there are significant
penalties for submitting false information, including the possibility of fine
and imprisonment for knowing violations.

13

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John D. Wagoner

4/14/97

Date

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H. J. Hatch

4/10/97

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Fluor Daniel Hanford, Inc.

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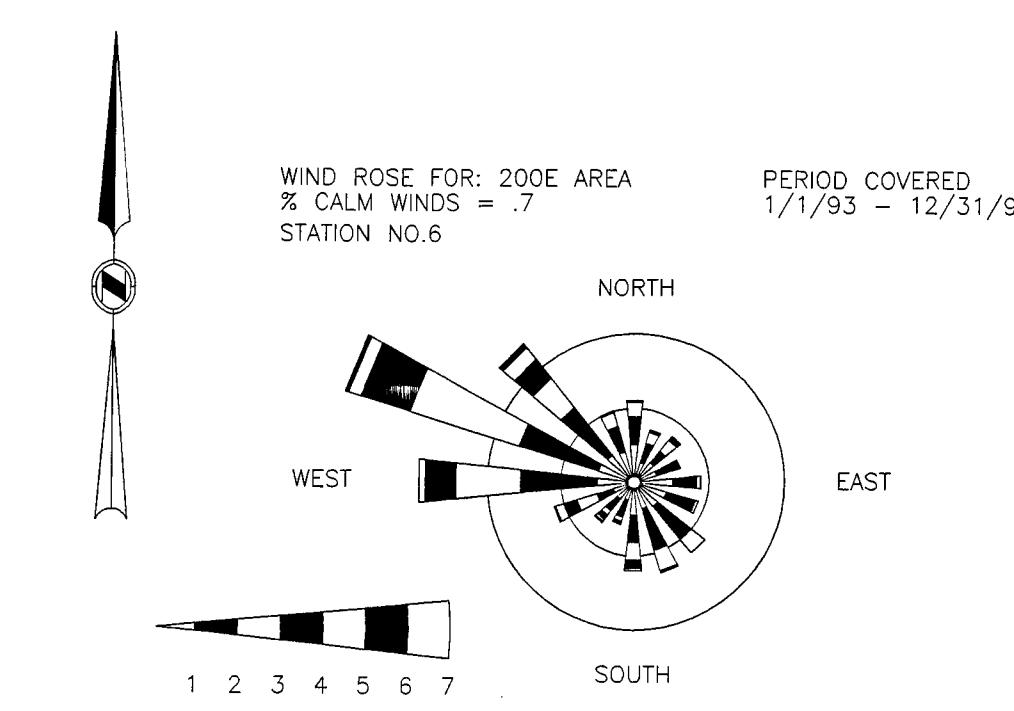
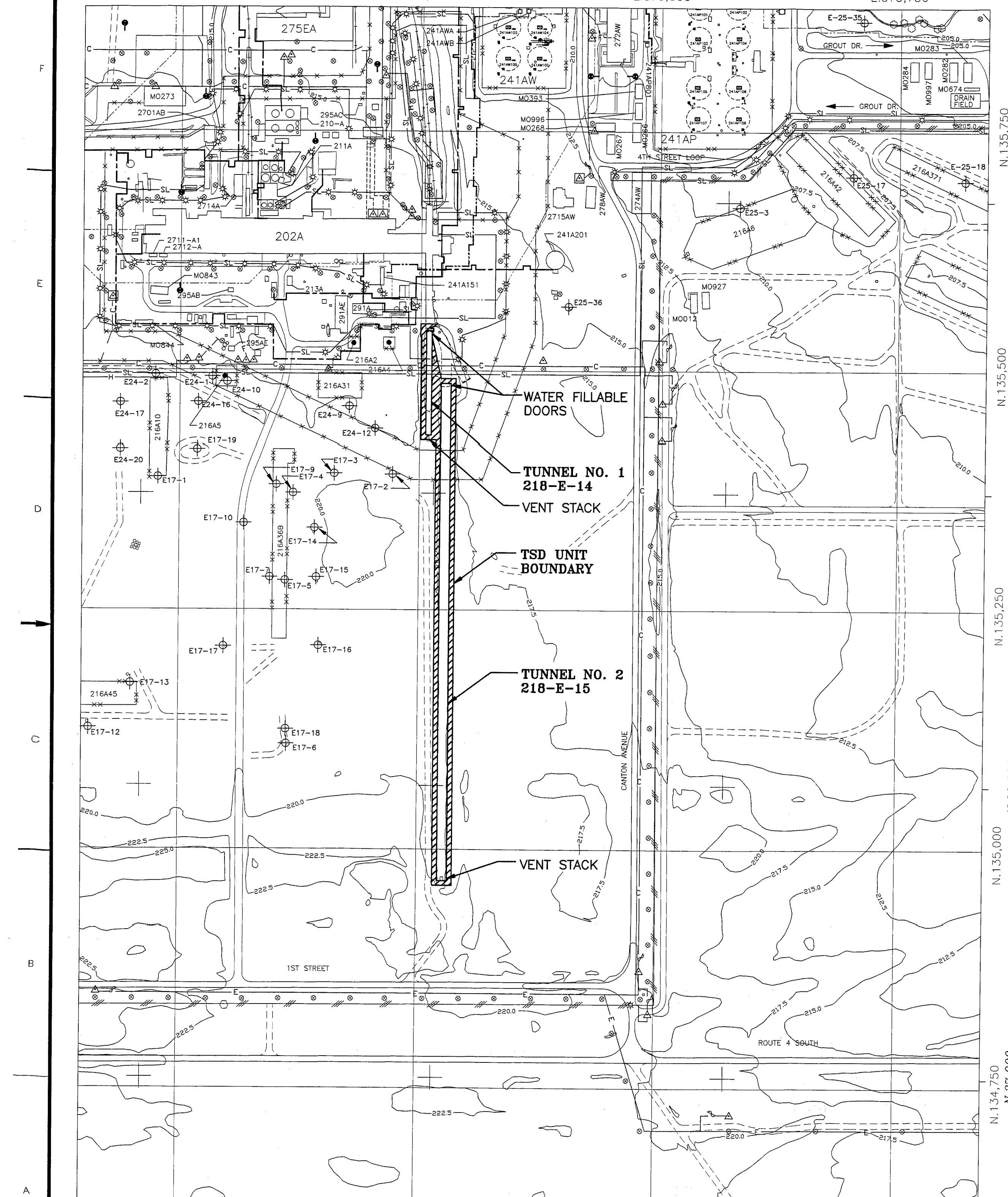
APPENDIX 2A

TOPOGRAPHIC MAP

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APPENDIX 2A

TOPOGRAPHIC MAP PUREX STORAGE TUNNELS

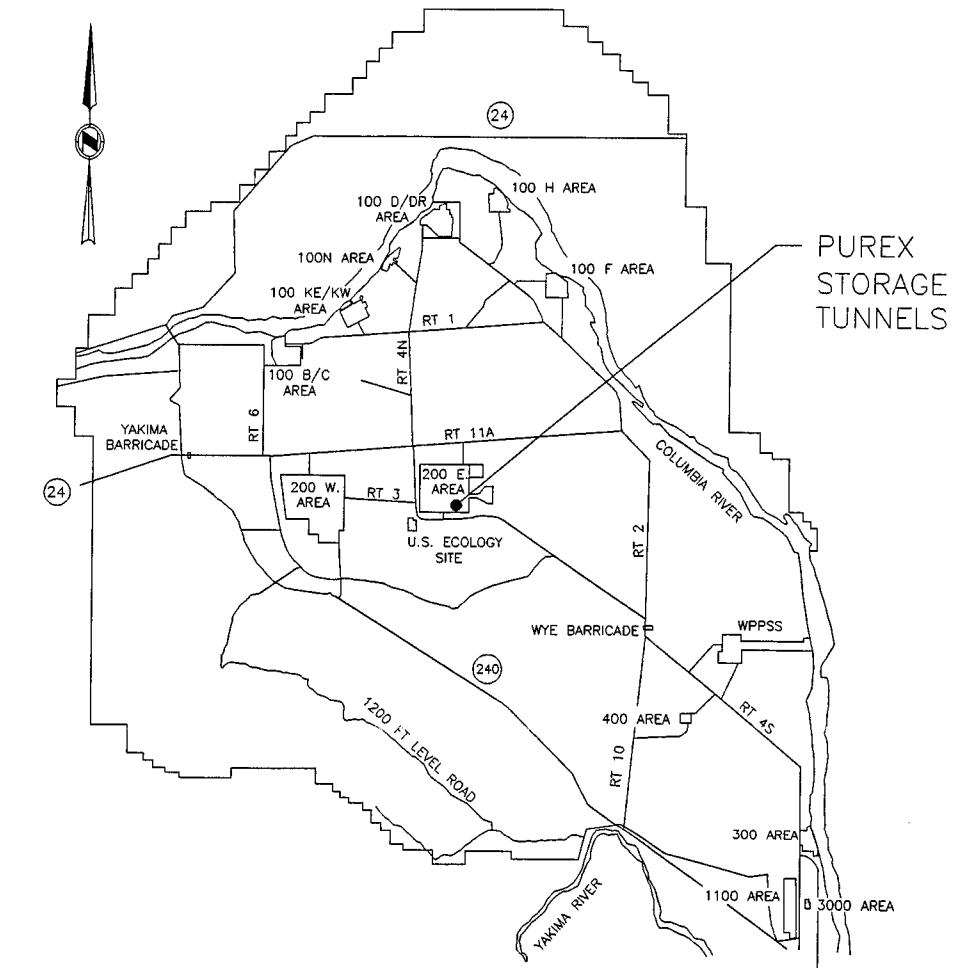
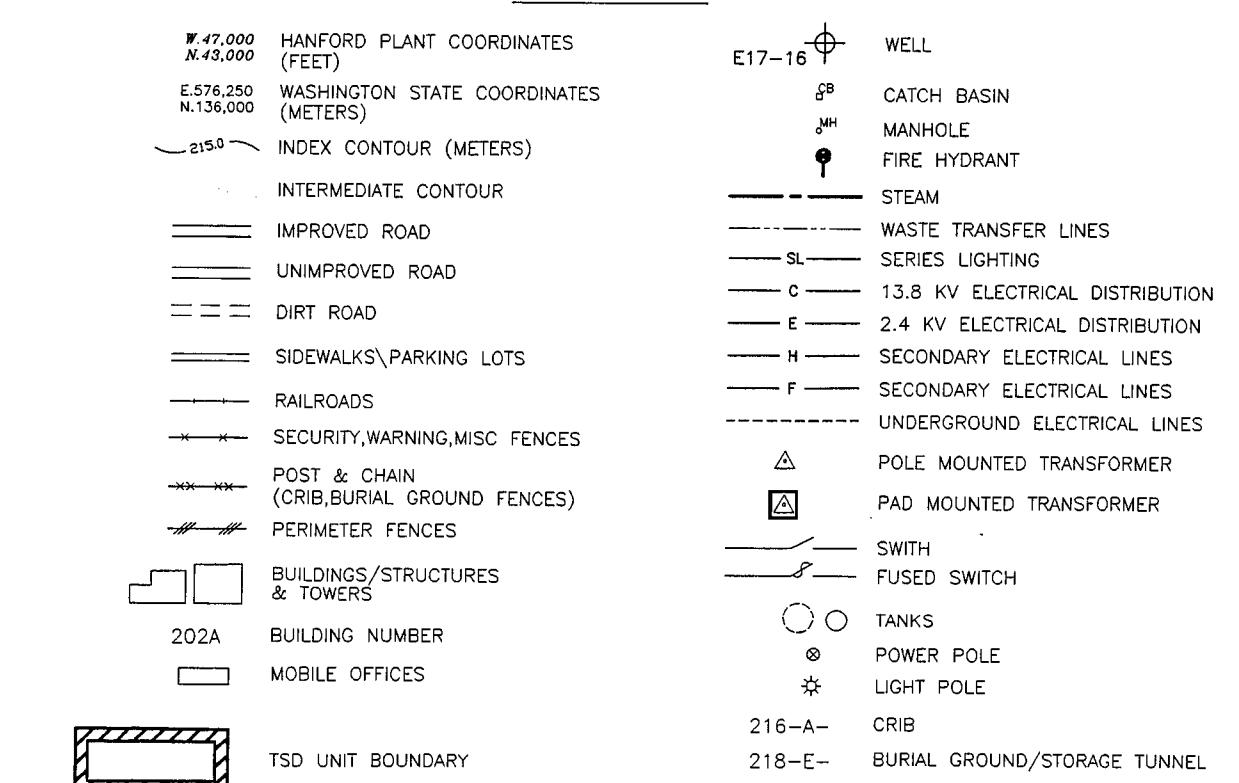


| <u>WIND CLASS</u> | <u>MILES/HOUR</u> | | |
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| 2----- | 4.0 | - | 7.0 |
| 3----- | 8.0 | - | 12.0 |
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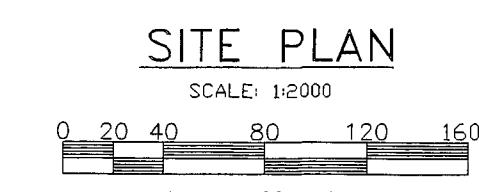
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GENERAL NOTES

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HORIZONTAL DATUM: NAD-83 LAMBERT PROJECTION. WASHINGTON STATE PLANE COORDINATES ARE SHOWN IN METERS.
CONTOUR INTERVAL: 0.5 METERS.
3. HANFORD PLANT GRID: A LOCAL GRID SYSTEM WITH ITS INITIAL POINT NORTHEAST OF THE 400 AREA. IT COVERS 200 EAST AND 200 WEST AREA AS WELL AS GENERAL SITE WORK SUCH AS WELLS AND BURIAL GROUNDS. HANFORD COORDINATES ARE SHOWN IN FEET.



KEY PLAN
SCALE: NONE



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| THIS MAP IS TO BE USED FOR REFERENCE PURPOSES ONLY. DO NOT USE THIS MAP FOR CONSTRUCTION PURPOSES. | | | | | | |
| TORRES | DATE 4-4-97 | U.S. DEPARTMENT OF ENERGY Richland Operations Office Lockheed Martin Hanford Company | | | | |
| <i>del</i> | 4-4-97 | A TOPOGRAPHIC MAP PUREX STORAGE TUNNELS | | | | |
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| <i>DB</i> | 4/7/97 | | | | | |
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APPENDIX 3A

WASTE ANALYSIS PLAN FOR PUREX STORAGE TUNNELS

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GLOSSARY

| | | |
|----|---------|--|
| 3 | ALARA | as low as reasonably achievable |
| 4 | ECOLOGY | Washington State Department of Ecology |
| 5 | EHW | extremely hazardous waste |
| 6 | EPA | U.S. Environmental Protection Agency |
| 7 | pH | negative logarithm of the hydrogen-ion |
| 8 | PUREX | concentration |
| 9 | QA/QC | plutonium-uranium extraction |
| 10 | TSD | quality assurance and quality control |
| 11 | | treatment, storage, and/or disposal |
| 12 | WAC | Washington Administrative Code |
| 13 | WAP | waste analysis plan |

METRIC CONVERSION CHART

The following conversion chart is provided to the reader as a tool to aid in conversion.

Into metric units

Out of metric units

| If you know | Multiply by | To get | If you know | Multiply by | To get |
|----------------------|-------------------------------------|--------------------|--------------------|---------------------------------|---------------|
| Length | | | | | |
| inches | 25.40 | millimeters | millimeters | 0.0393 | inches |
| inches | 2.54 | centimeters | centimeters | 0.393 | inches |
| feet | 0.3048 | meters | meters | 3.2808 | feet |
| yards | 0.914 | meters | meters | 1.09 | yards |
| miles | 1.609 | kilometers | kilometers | 0.62 | miles |
| Area | | | | | |
| square inches | 6.4516 | square centimeters | square centimeters | 0.155 | square inches |
| square feet | 0.092 | square meters | square meters | 10.7639 | square feet |
| square yards | 0.836 | square meters | square meters | 1.20 | square yards |
| square miles | 2.59 | square kilometers | square kilometers | 0.39 | square miles |
| acres | 0.404 | hectares | hectares | 2.471 | acres |
| Mass (weight) | | | | | |
| ounces | 28.35 | grams | grams | 0.0352 | ounces |
| pounds | 0.453 | kilograms | kilograms | 2.2046 | pounds |
| short ton | 0.907 | metric ton | metric ton | 1.10 | short ton |
| Volume | | | | | |
| fluid ounces | 29.57 | milliliters | milliliters | 0.03 | fluid ounces |
| quarts | 0.95 | liters | liters | 1.057 | quarts |
| gallons | 3.79 | liters | liters | 0.26 | gallons |
| cubic feet | 0.03 | cubic meters | cubic meters | 35.3147 | cubic feet |
| cubic yards | 0.76456 | cubic meters | cubic meters | 1.308 | cubic yards |
| Temperature | | | | | |
| Fahrenheit | subtract 32 then multiply by 5/9ths | Celsius | Celsius | multiply by 9/5ths, then add 32 | Fahrenheit |

Source: *Engineering Unit Conversions*, M. R. Lindeburg, PE., Second Ed., 1990, Professional Publications, Inc., Belmont, California.

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14 TABLE

1.0 FACILITY DESCRIPTION

1
2
3
4 This waste analysis plan (WAP) has been prepared for the PUREX Storage
5 Tunnels, located on the Hanford Facility, Richland, Washington. This WAP
6 applies to all mixed waste (containing both radioactive and dangerous
7 components) regulated by Washington Administrative Code (WAC) 173-303 that is
8 transferred to and/or contained in the PUREX Storage Tunnels.

9
10 The PUREX Storage Tunnels are permitted as a miscellaneous unit under
11 WAC 173-303-680. The bulk of the waste stored in the PUREX Storage Tunnels is
12 not placed in a typical container; rather, this waste is placed on a portable
13 device (railcar) that is used as a storage platform. In general, the mixed
14 waste stored in the PUREX Storage Tunnels is encased or contained within
15 carbon or stainless steel plate, pipe, or vessels. Therefore, the mixed waste
16 normally is not exposed to the tunnel environment.

17
18 The PUREX Facility, located in the 200 East Area, consists of two
19 separate treatment, storage, and/or disposal (TSD) units, the PUREX Plant
20 (202-A Building) and the PUREX Storage Tunnels. Access to the PUREX Storage
21 Tunnels is by means of the railroad tunnel.

22
23 The PUREX Storage Tunnels branch off from the railroad tunnel and extend
24 southward from the east end of the PUREX Plant. The tunnels are used for
25 storage of radioactive and mixed waste from the PUREX Plant and from other
26 onsite sources. Each storage tunnel is isolated from the railroad tunnel by a
27 water-fillable shielding door. There are no electrical utilities, water
28 lines, drains, fire detection or suppression systems, radiation monitoring, or
29 communication systems provided inside the PUREX Storage Tunnels.

30
31 Material selected for storage is loaded on railcars modified to serve as
32 both transport and storage platforms. Normally, a remote-controlled,
33 battery-powered locomotive was used to position the railcar in the storage
34 tunnel. In the past and possibly in the future, other remote movers, e.g.,
35 standard locomotive with a string of railcar spacers, power winch, etc., have
36 or could be used to position a railcar into the tunnel or to withdraw a car
37 from the tunnel. The railcar storage positions are numbered sequentially,
38 commencing with Position 1 that abuts the railstop bumper at the south end of
39 each tunnel. Position 2 is the location of the railcar that abuts the railcar
40 in Position 1 and so forth. The railcars and material remain in the storage
41 tunnel until final disposition is determined. Each railcar is retrievable;
42 however, because the railcars are stored on a single, dead-end railroad track,
43 the railcars can be removed only in reverse order (i.e., last in, first out).

44
45 Construction of Tunnel Number 1 was completed in 1956 and consists of
46 three areas: the water-fillable door, the storage area, and the vent shaft.
47 The water-fillable door is located at the north end of Tunnel Number 1 and
48 separates the storage tunnel from the railroad tunnel. The door is 7.5 meters
49 high, 6.6 meters wide, and 2.1 meters thick, and is constructed of
50 1.3-centimeter steel plate. The door is hollow so that the door can be filled
51 with water to act as a radiation shield when the door is in the down (closed)

1 position. If the door is filled with water, the water must be pumped from the
2 door before the door can be raised. Above the door is a reinforced concrete
3 structure into which the door is raised to open the tunnel. Electric hoists
4 used for opening and closing the door are located on the top of this concrete
5 structure.

6 The storage area is that portion of the tunnel that extends southward
7 from the water-fillable door. Inside dimensions of Tunnel Number 1 are
8 109.1 meters long, 6.7 meters high, and 5.9 meters wide. Ceiling and walls
9 are 35.6-centimeters thick and constructed of 30.5- by 35.6-centimeter
10 creosote pressure-treated Douglas fir timbers arranged side by side. The
11 first 30.5 meters of the east wall are constructed of 0.9-meter-thick
12 reinforced concrete. A 40.8-kilogram mineral-surface roofing material was
13 used to cover the exterior surface of the timbers before placement of
14 2.4 meters of earth fill. The earth cover serves as protection from the
15 elements and as radiation shielding. The timbers that form the walls rest on
16 reinforced concrete footings 0.9 meter wide by 0.3 meter thick. The floor
17 consists of a railroad track laid on a gravel bed. The space between the ties
18 is filled to top-of-tie with gravel ballast. The tracks are on a 1.0 percent
19 downward slope to the south to ensure that the railcars remain in their
20 storage position. A railcar bumper is located 2.4 meters from the south end
21 of the tracks to act as a stop. The capacity of the storage area is eight,
22 12.8-meter-long railcars.

23 In June 1960, the first two railcars were loaded with a single,
24 approximately 12.5-meter-long, failed separation column and placed in Tunnel
25 Number 1. Between June 1960 and January 1965, six more railcars were placed
26 in Tunnel Number 1, filling the tunnel. After the last car was placed in the
27 northern-most storage position (Position 8), the water-fillable door was
28 closed, filled with water, and deactivated electrically.

29 Construction of Tunnel Number 2 was started and completed in 1964. Like
30 Tunnel Number 1, Tunnel Number 2 consists of three functional areas: the
31 water-fillable door, the storage area, and the vent shaft. Construction of
32 Tunnel Number 2 differs from that of Tunnel Number 1 as follows.

- 33 • A combination of steel and reinforced concrete was used in the
34 construction of the storage area for Tunnel Number 2 rather than wood
35 timbers, as used in Tunnel Number 1.
- 36 • Tunnel Number 2 is longer, having a storage capacity of five times
37 that of Tunnel Number 1.
- 38 • The floor of Tunnel Number 2, outboard of the railroad ties, slopes
39 upward to a height of approximately 1.8 meters above the railroad bed,
40 whereas the floor in Tunnel Number 1 remains flat all the way out to
41 the side walls.
- 42 • The railroad tunnel approach to Tunnel Number 2 angles eastward then
43 angles southward to parallel Tunnel Number 1. The approach to Tunnel
44 Number 1 is a straight extension southward from the PUREX Plant.

1 Center-line to center-line distance between the two tunnels is
2 approximately 18.3 meters.
3

4 The physical structure of the water-fillable door at the north end of
5 Tunnel Number 2 essentially is identical to the water-fillable door for Tunnel
6 Number 1. The water-fillable door for Tunnel Number 2 is approximately
7 57.9 meters south and 18.3 meters east of the water-fillable door for Tunnel
8 Number 1. As of March 1997, the door is empty and there is no plan to fill
9 the door.
10

11 The storage area of Tunnel Number 2 is that portion of the tunnel
12 extending southward from the water-fillable door. Construction of this
13 portion of Tunnel Number 2 consists of a 10.4-meter diameter, steel
14 (0.5 centimeter plate), semicircular-shaped roof, supported by internal I-beam
15 wales attached to external, reinforced concrete arches. The concrete arches
16 are 0.4 meter thick and vary in width from 0.4 to 1.8 meters. The arches are
17 spaced on 4.8 meter centers. This semicircular structure is supported on
18 reinforced concrete grade beams approximately 1.8 meters wide by 1.2 meters
19 thick (one on each side) that run the full length of Tunnel Number 2. The
20 interior and exterior surfaces of the steel roof are coated with a bituminous
21 coating compound to inhibit corrosion. The entire storage area is covered
22 with 2.4 meters of earth fill to serve as radiation shielding.
23

24 The nominal inside dimensions of Tunnel Number 2 are 514.5 meters long,
25 7.9 meters high, and 10.4 meters wide. However, because of the arch-shaped
26 cross-section of Tunnel Number 2 and entry clearance at the water-fillable
27 door, the usable storage area (width and height above top-of-rail) is
28 6.7 meters high and 5.8 meters wide, the same dimensions as for Tunnel
29 Number 1. The floor consists of a railroad track laid on a gravel bed. The
30 space between ties is filled to top-of-tie with gravel ballast. Commencing at
31 the ends of the 2.4-meter-long ties, the earth floor is sloped upward on a
32 1 (vertical) to 1 1/2 (horizontal) grade. The tracks are on a 1/10 of
33 1 percent downgrade slope to the south to ensure the railcars remain in their
34 storage position. A railcar bumper is located 2.4 meters from the south end
35 of the tracks to act as a stop. The capacity of the storage area is 40,
36 12.8-meter-long railcars.
37

38 The first railcar was placed in storage in December 1967. Table 1
39 contains an approximate inventory of waste stored in the PUREX Storage
40 Tunnels.
41

42 The only free-liquid dangerous waste stored in the tunnels is mercury.
43 The mercury is contained within thick-walled 0.8 centimeter thermowells
44 constructed from 7.6-centimeter Schedule 80, 304L stainless steel pipe. The
45 top of the thermowell is closed with a 304L stainless steel nozzle plug with a
46 metal-to-metal seal. The amount of mercury per thermowell is less than
47 1.7 liters.
48

49 Other liquid containers, such as large discarded process tanks or
50 vessels, are stored in the PUREX Storage Tunnels. The containers in storage
51 are empty [per WAC 173-303-160(2)(a)]. Before storage, the vessels have been

1 flushed and in recent years the final rinsate sampled and analyzed to verify
2 that the residual heel is not a dangerous waste.
3

4 The only stored dangerous waste that is either reactive or ignitable is
5 silver nitrate in the silver reactors, which is designated as ignitable (D001)
6 [WAC 173-303-090(5)]. The potential for ignition is considered to be
7 negligible because this material is dispersed on ceramic packing and is
8 physically isolated from contact with any combustible material or ignition
9 source.

10
11
12 **1.1 PROCESS AND ACTIVITIES**
13

14 The function of the PUREX Tunnels is to store mixed waste until the waste
15 can be processed for final disposal. When waste is to be placed in the
16 storage tunnels, a work plan, describing the overall transfer activities, and
17 a storage tunnel checklist are prepared. The work plan and storage tunnel
18 checklist are routed for review and concurrence by key personnel and forwarded
19 to management for approval.
20

21
22 **1.2 PHYSICAL CHARACTERIZATION OF MATERIAL TO BE STORED**
23

24 Physical characterization of waste includes an evaluation of the
25 following physical properties:
26

- 27 • Length, width, and height
- 28 • Gross weight and volume
- 29 • Preferred orientation for transport and storage
- 30 • Presence of dangerous waste constituents.

31 Information sources used in physical characterization include equipment
32 fabrication and installation drawings, operational records, and process
33 knowledge. Physical characterization provides information necessary to
34 appropriately describe the waste material. Such information also is used to
35 design and fabricate, if required, supports on the railcar.
36

37 Before removal from service, the equipment could be flushed to minimize
38 loss of products, to reduce radioactive contamination, and to reduce dangerous
39 waste constituents present in a residual heel to nonregulated levels. When
40 equipment is flushed, analysis of the rinsate is used to determine when these
41 goals have been achieved.
42

43
44 **1.3 IDENTIFICATION/CLASSIFICATION AND QUANTITIES OF DANGEROUS**
45 **WASTE MANAGED WITHIN THE PUREX STORAGE TUNNELS**
46

47 Because dangerous waste is an integral part of radioactively contaminated
48 material, the dangerous waste is managed as mixed waste. Table 1 contains an
49 inventory of waste stored within the PUREX Storage Tunnels.
50

2.0 WASTE ANALYSIS PARAMETERS

Analytical requirements were selected on the basis of knowledge required for the safe handling and storage of the waste within the PUREX Storage Tunnels, including any operational compliance issues.

2.1 WASTE IDENTIFICATION

A prerequisite step in proper waste management is to adequately address whether waste being considered for management within the PUREX Storage Tunnels falls within the scope of this unit's permit. This includes identifying any dangerous waste in accordance with regulatory and permit requirements and applicability of any land disposal restrictions.

This section provides information on how the chemical and physical characteristics of the mixed waste currently stored in the PUREX Storage Tunnels were determined so that the waste is stored and managed properly.

Regulated material presently stored in the PUREX Storage Tunnels contains the following dangerous waste:

- Lead
- Mercury
- Silver and silver salts
- Chromium
- Cadmium
- Barium
- Mineral oil.

Because the dangerous waste is an integral part of radioactively contaminated material, this material is managed as a mixed waste. Table 1 provides an approximation of the total amount of waste contained in the PUREX Storage Tunnels.

Storage of non-PUREX Plant waste is reviewed on a case-by-case basis. Sampling, chemical analysis, process knowledge (as discussed in the following section), and/or inventory information from waste tracking forms provided from other onsite sources are required to confirm the characteristics and quantities of mixed waste to be stored. Future waste and dangerous constituents might not be in the same configuration or form as described in the following sections.

2.1.1 Lead

Lead stored was used in various capacities during past Hanford Facility operations. Primary functions of lead included use as weights, counterweights, and radiation shielding. Often the lead is encased in steel.

1 (carbon or stainless) to facilitate its attachment to various types of
2 equipment.

3
4 Lead exhibits the characteristic of toxicity as determined by the
5 toxicity characteristics leaching procedure and is designated D008
6 [WAC 173-303-090(8)]. The quantity of lead present could produce an extract
7 greater than 500 milligrams per liter should the lead be exposed to a
8 leachate. However, because the bulk of the lead is encased in steel, is
9 stored inside a weather-tight structure, and is elevated above floor level on
10 railcars that isolate the lead from other materials stored, the potential for
11 exposure of bare lead to a leachate is considered negligible.

12
13 Sampling and chemical analysis is not performed on lead associated with
14 the material placed in the PUREX Storage Tunnels. Therefore, the accuracy of
15 the estimate on the amount of lead presently stored in each tunnel is limited
16 to the data available from process knowledge. Counterweights on equipment
17 dunnage and lead used for shielding cannot be quantified by existing
18 historical records and are not included in the amount of lead listed on
19 Table 1. However, if removed from the tunnels, the material will be examined
20 and any suspect attachments will be removed, evaluated, and disposed of in
21 accordance with established methods.

22 23 2.1.2 Mercury

24
25 Mercury is contained within thermowells that are an integral part of
26 irradiated reactor fuel dissolvers used at the PUREX Plant. The dissolvers
27 are large 304L stainless steel process vessels that are approximately
28 2.7 meters in diameter, 7.3 meters tall, and weigh approximately
29 26,309 kilograms. The outer shell is constructed of a 1-centimeter-thick
30 plate. The dissolvers were used in decladding and dissolving irradiated
31 reactor fuel in the PUREX Plant.

32
33 Depending on the specific dissolver in question, 19.1 or 45.4 kilograms
34 of mercury (1.4 or 1.77 liters) were poured into each of the two thermowells
35 per dissolver (38.2 or 90.8 kilograms total per dissolver) following vertical
36 installation of the dissolvers inside the PUREX canyon and before the
37 dissolver was installed in a process cell. The mercury served to transfer
38 heat from the dissolver interior to the thermohm temperature sensor mounted
39 within the thermowell. This mercury remains within the thermowells of
40 discarded dissolvers. In preparation for storage, the thermohms were removed
41 and the upper end of each thermowell was plugged with a 304L stainless steel
42 nozzle plug. In storage, the discarded dissolver rests in an inclined
43 position in a cradle on the railcar. The mercury contained in the thermowells
44 remains in the lower portion of each thermowell and, under normal conditions,
45 is never in contact with the mechanical closure on the nozzle end of the
46 thermowell.

47
48 Mercury exhibits the characteristic of toxicity as determined by the
49 toxicity characteristics leaching procedure and is designated D009
50 [WAC 173-303-090(8)].

1 The potential for mercury to become exposed to leachate is considered
2 negligible. The PUREX Storage Tunnels are designed and constructed as
3 weather-tight structures. Further, the mercury is encased in a stainless
4 steel pipe within a stainless steel vessel that is stored on a railcar above
5 the floor level of the tunnels. Therefore, exposure of the mercury stored in
6 the tunnels to leachate is not considered a credible occurrence.
7

8 Sampling and chemical analysis is not performed on mercury associated
9 with the dissolvers stored in Tunnel Number 2. The quantity of mercury
10 present in each thermowell is documented on Table 1.
11
12

13 2.1.3 Silver 14

15 Silver, mostly in the form of silver salts deposited on unglazed ceramic
16 packing, is contained within the discarded silver reactors stored in Tunnel
17 Number 2. The silver reactors were used to remove radioactive iodine from the
18 offgas streams of the irradiated reactor fuel dissolvers. The reactor vessel
19 is approximately 1.4 meters in diameter by 4.1 meters tall and is constructed
20 of 1-centimeter 304L stainless steel. The vessel contains two 1.2-meter-deep
21 beds of packing. Each bed consists of a 30.5-centimeter depth of
22 2.5-centimeter unglazed ceramic saddles topped with a 0.6-meter depth of
23 1.3-centimeter unglazed ceramic saddles. The two beds are separated
24 vertically by a distance of about 0.6 meter, and each bed rests on a support
25 made of stainless steel angles and coarse screen. The packing was coated
26 initially with 113.4 kilograms of silver nitrate used for iodine retention.
27 Nozzles on the top of the reactor were provided to allow flushing and/or
28 regeneration of the packing with silver nitrate solution as the need arose.
29

30 Because of competing reactions, which include conversion of silver
31 nitrate to silver iodide, reduction of silver nitrate to metallic silver, and
32 formation of silver chloride, the packing of a stored silver reactor contains
33 a mixture of silver nitrate, silver halides, and silver fines.
34

35 Silver salts exhibit the characteristics of toxicity as determined by the
36 toxicity characteristics leaching procedure and are designated D011
37 [WAC 173-303-090(8)]. Also, silver salts exhibit the characteristic of
38 ignitability and are designated as D001 [WAC 173-303-090(5)].
39

40 The potential of silver, including silver salts, stored in the PUREX
41 Storage Tunnels to become exposed to leachate is considered negligible.
42 Silver is contained within a stainless steel vessel, stored inside a
43 weather-tight structure, and elevated above floor level on a railcar.
44 Therefore, exposure of the silver stored in the tunnels to leachate is not
45 considered to be a credible occurrence. Also, the contained silver is
46 isolated from contact with any combustibles; therefore, the possibility of
47 ignition is considered to be extremely remote.
48

49 Provisions for taking samples of the packing were not provided in the
50 design of the vessels. Therefore, sampling and chemical analysis are not
51 performed for silver salts before placing a silver reactor in storage.
52

1 However, for accountability, the total silver content (Table 1) is considered
2 to be silver nitrate, the salt that exhibits the characteristics of both
3 ignitability and toxicity.

4
5 The quantity of silver salts contained within a discarded silver reactor
6 is a function of silver nitrate regeneration history. Operating records
7 (process knowledge) of regenerations and flushes are used to estimate the
8 total accumulation of silver within each reactor.
9

10
11 2.1.4 Chromium

12
13 Presently, chromium stored in Tunnel Number 2 is contained within a
14 failed concentrator removed from the PUREX Plant, and within stainless steel
15 containers received from the 324 Building. The concentrator is a vertical
16 tube structure that was used to concentrate aqueous streams from the final
17 uranium cycle, final plutonium cycles, final neptunium cycles, and condensate
18 from the acid recovery system for recycle. Following service, the
19 concentrator was inspected and found to contain silicate solids with high
20 levels of chromium from the corrosion of stainless steel. The existence of
21 chromium within the 324 Building waste was determined through process
22 knowledge.
23

24 Chromium exhibits the characteristic of toxicity as determined by the
25 toxicity characteristics leaching procedure and is designated D007
26 [WAC 173-303-090(8)].
27

28 The potential for the chromium stored in Tunnel Number 2 to become
29 exposed to leachate is considered negligible. Tunnel Number 2 is designed and
30 constructed to be weather-tight. Further, the chromium is encased within
31 stainless steel vessels and containers that are stored on railcars above the
32 floor level of the tunnel. Therefore, exposure of the chromium stored in the
33 tunnel to leachate is not considered a credible occurrence.
34

35 The quantity of chromium within the concentrator was estimated by
36 calculating the volume of silicate solids and the percentage of chromium
37 within the silicate solids. The quantity of chromium in the 324 Building
38 waste was based on process knowledge.
39

40
41 2.1.5 Cadmium

42
43 Presently, cadmium stored in the PUREX Storage Tunnel Number 2 is
44 associated with radiation shielding and with a dissolver moderator removed
45 from the PUREX Plant, and within stainless steel containers received from the
46 324 Building. The cadmium was used to shield equipment from radiation and
47 consists of sheets of the metal attached to lead, both of which could be
48 encased in steel. The cadmium received from the 324 Building was used in
49 waste technology research and development programs.
50

1 The dissolvers are annular vessels that are geometrically favorable for
2 criticality safety. The dissolvers were placed over cadmium lined (neutron
3 absorbers) moderators for additional criticality safety. The moderator is a
4 centrally located, cylindrical, cadmium-jacketed 0.08-centimeter-thick
5 concrete 15.2-centimeter-thick neutron absorber. The moderators are
6 approximately 4.4 meters tall by approximately 1.5 meters outer diameter.

7 Cadmium exhibits the characteristic of toxicity as determined by the
8 toxicity characteristics leaching procedure and is designated D006
9 [WAC 173-303-090(8)]. If exposed to a leachate, the quantity of cadmium
10 present could produce an extract having a concentration of greater than or
11 equal to 1 milligram per liter, but less than 100 milligrams per liter;
12 therefore, the mixed waste is managed as a WT02 [WAC 173-303-100(5)].

13 The potential for the cadmium stored in Tunnel Number 2 to become exposed
14 to leachate is considered negligible. Tunnel Number 2 is designed and
15 constructed to be weather-tight. Further, the cadmium is stored on railcars
16 above the floor level of the tunnel. Therefore, exposure of the cadmium
17 stored in the tunnel to leachate is not considered a credible occurrence.

21 2.1.6 Barium

22 Presently, barium is stored in Tunnel Number 2 in stainless steel
23 containers received from the 324 Building. The waste was generated during
24 numerous research and development programs conducted in B-Cell of the Waste
25 Technology Engineering Laboratory (324 Building). The existence of barium
26 within the 324 Building waste was determined through process knowledge.

27 Barium exhibits the characteristic of toxicity as determined by the
28 toxicity characteristics leaching procedure and is designated D005
29 [WAC 173-303-090(8)].

30 The potential for barium stored in Tunnel Number 2 to become exposed to
31 leachate is considered negligible. Tunnel Number 2 is designed and
32 constructed to be weather-tight. Further, the barium is encased in steel
33 containers stored on a railcar above the floor level of the tunnel.
34 Therefore, exposure of the barium stored in the tunnel to leachate is not
35 considered a credible occurrence.

41 2.1.7 Mineral Oil

42 Presently, mineral oil is stored in Tunnel Number 2 in stainless steel
43 containers received from the 324 Building. The mineral oil was used in the
44 B-Cell viewing windows in the 324 Building. Oil leaking from the windows was
45 absorbed on rags and clay absorbent material.

46 The material safety data sheet for the mineral oil lists a lethal dose
47 (LD_{50}) of 2 grams per kilogram (dermal rabbit). Therefore, the oil designates
48 as a Toxic Category A WT02 [WAC 173-303-100(5)].

1 The potential for the absorbed mineral oil stored in Tunnel Number 2 to
2 become exposed to leachate is considered negligible. Tunnel Number 2 is
3 designed and constructed to be weather-tight. Further, the mineral oil is
4 encased in steel containers stored on a railcar above the floor level of the
5 tunnel. Therefore, exposure of the mineral oil stored in the tunnel to
6 leachate is not considered a credible occurrence.

7

8 2.1.8 Identification of Incompatible Waste

9

10 The next step is to ensure that sufficient information concerning the
11 waste has been provided so the waste can be managed properly. This includes
12 identifying incompatible waste. These safety issues primarily are related to
13 prevention of unwanted chemical reactions that could create a catastrophic
14 situation, such as a fire, an explosion, or a large chemical release.

15

16

17 2.1.9 Operational Considerations

18

19 Sufficient information must be available to ensure that incoming waste
20 meets operational acceptance limits, e.g., physical size, radiation limits,
21 and WAC 173-303 requirements. These operating specifications are limits and
22 controls imposed on a process or operation that, if violated, could jeopardize
23 the safety of personnel, and could damage equipment, facilities, or the
24 environment. Operating specifications have been established from operating
25 experience, process knowledge, and calculations.

26

27

28 2.2 PARAMETER AND RATIONALE SELECTION PROCESS

29

30 This WAP describes the process to ensure that the dangerous waste
31 components of the material stored in the tunnels are properly characterized
32 and designated so that dangerous and mixed waste is managed properly.

33

34 The parameters considered for waste designation under WAC 173-303-070(3)
35 and the rationale for their application are discussed in the following
36 sections.

37

38

39 2.2.1 Discarded Chemical Products

40

41 The first category of dangerous waste designation is "Discarded Chemical
42 Products" (WAC 173-303-081). The waste stored in the tunnels does not fit the
43 definitions in WAC 173-303-081 for a discarded chemical product. Therefore,
44 the waste stored in the PUREX Storage Tunnels is not designated as a discarded
45 chemical product.

46

47

48 2.2.2 Dangerous Waste Sources

49

50 The second category of dangerous waste designation is "Dangerous Waste
51 Sources" (WAC 173-303-082). The waste stored in the tunnels is not listed on

1 the "Dangerous Waste Sources List" (WAC 173-303-9904). Therefore, the waste
2 stored in the PUREX Storage Tunnels is not designated as a dangerous waste
3 source.

4

5

6 **2.2.3 Dangerous Waste Characteristics**

7

8 The third category of dangerous waste designation is "Dangerous Waste
9 Characteristics" (WAC 173-303-090). The characteristics are as follows.

10

11 • Characteristic of Ignitability--Although the solid silver nitrate has
12 not been tested in accordance with Appendix F of 49 CFR 173, the waste
13 is assumed to be an oxidizer as specified in 49 CFR 173.127(a).
14 Therefore, the silver nitrate waste is assumed to exhibit the
15 characteristic of ignitability under WAC 173-303-090(5) and is
16 designated as D001.

17

18 • Characteristic of Corrosivity--Some of the material stored within the
19 tunnels either has contained or has been in contact with corrosive
20 liquids. The standard operating procedure has been to flush vessels
21 with water to recover as much special nuclear material as practical.
22 Also, flushing removes much of the radioactive contamination,
23 minimizing the spread of contamination during handling. Currently,
24 the final aqueous rinse is sampled and analyzed to confirm that the pH
25 is greater than 2 and less than 12.5. Therefore, the waste stored in
26 the PUREX Storage Tunnels is not designated as corrosive waste.

27

28 • Characteristic of Reactivity--The waste stored in the tunnels does not
29 meet any of the definitions of reactivity as defined in
30 WAC 173-303-090(7). The waste material is not unstable, does not
31 react violently with water, does not form explosive mixtures, or does
32 not generate toxic gases. Therefore, the waste stored in the PUREX
33 Storage Tunnels is not designated as reactive waste.

34

35 • Characteristic of Toxicity--Lead, mercury, silver, chromium, barium,
36 and cadmium are identified on the Toxicity Characteristics list. The
37 quantity of these materials stored in the tunnels is sufficient that,
38 should the substances come in contact with a leachate (an event
39 considered unlikely), the concentration of the extract could be above
40 the limits identified in the list. Therefore, this waste is
41 designated D005, D006, D007, D008, D009, and D011.

42

43 The PUREX Storage Tunnels also are permitted for selenium (D010).
44 Currently, there is no waste stored in the tunnels that is designated
45 for D010; however, there is a potential for waste with this waste
46 number to be stored within the tunnels.

47

48

49 **2.2.4 Dangerous Waste Criteria**

1 The fourth category of dangerous waste designation is "Dangerous Waste
2 Criteria" (WAC 173-303-100). The criteria are as follows:

3

4 • Toxicity Criteria--Cadmium meets the toxicity criteria in
5 WAC 173-303-100(5) when performing a book designation. Because of the
6 concentrations present, the waste containing these constituents is
7 designated as dangerous waste (DW) and is assigned the dangerous waste
8 number of WT02.

9

10 • Persistence Criteria--Currently, no waste stored in the tunnels has
11 been designated as persistent per WAC 173-303-100(6).

12

13 **2.2.5 Waste Designation Summary**

14

15

16 The mixed waste currently stored in the PUREX Storage Tunnels is
17 designated as follows:

18

19 • Lead--D008; EHW

20 • Mercury--D009; EHW

21 • Silver and silver salts--D001, D011; EHW

22 • Chromium--D007; EHW

23 • Cadmium--D006, WT02; DW

24 • Barium--D005; EHW

25 • Mineral Oil--WT02; DW.

26

27 **2.3 RATIONALE FOR PARAMETER SELECTION**

28

29 Refer to Section 2.2.

30

31 **2.4 SPECIAL PARAMETER SELECTION**

32

33 Refer to Section 2.2.

34

35 **3.0 SELECTION OF SAMPLING PROCEDURES**

36

37

38

39 The following sections discuss the sampling methods and procedures that
40 will be used. Sampling usually will be in accordance with requirements
41 contained in the pertinent sampling analysis plan, procedures, and/or other
42 documents that specify sampling and analysis parameters.

43

44

45

46 **3.1 SAMPLING STRATEGIES**

47

48 The only analysis presently used in support of the PUREX Storage Tunnels
49 operation is a corrosivity check on the final in-place aqueous rinse of

1 discarded vessels before the vessels are released for storage. The pH is
2 determined by a pH meter using U.S. Environmental Protection Agency (EPA) Test
3 Method 9040 or 9041 in *Test Methods for the Evaluation of Solid Waste: Physical/Chemical Methods* (EPA 1986). The RCRA sampling will not be performed
4 on any waste currently stored in the PUREX Storage Tunnels.
5

6 Waste received that is not generated at the PUREX Plant could require
7 sampling strategies associated with this waste that will be developed on a
8 case-by-case basis.
9

10
11
12 **3.1.1 Sampling Methods**
13

14 Process knowledge of the characteristics and the quantities of the
15 dangerous waste to be stored in the PUREX Storage Tunnels is considered
16 sufficient to properly designate and manage the stored waste.
17

18 The waste currently stored in the tunnels is lead, mercury, chromium,
19 cadmium, barium, mineral oil, silver, and silver salts. Sampling and chemical
20 analysis of the lead, mercury, cadmium, barium, mineral oil, or chromium to
21 confirm their presence would not provide additional data beneficial to proper
22 management of the waste and would not be in compliance with as low as
23 reasonably achievable (ALARA) principles. The silver salts are dispersed over
24 a large area on ceramic packing contained within a large stainless steel
25 reactor vessel. Representative sampling of the ceramic packing is not
26 considered to be practical and therefore was not performed.
27

28 If RCRA sampling is required for operation of the PUREX Storage Tunnels,
29 representative sampling methods referenced in WAC 173-303-110 or some other
30 method approved by the Washington State Department of Ecology (Ecology) will
31 be used.
32

33 For waste received from other Hanford Facility activities, existing
34 sampling, chemical analysis, and/or process knowledge documentation is used to
35 confirm the characteristics and quantities of mixed waste to be stored.
36 Storage of non-PUREX Facility waste is reviewed on a case-by-case basis.
37
38

39 **3.1.2 Frequency of Analyses**
40

41 Because the dangerous waste components of mixed waste stored in the PUREX
42 Storage Tunnels are stable and will remain undisturbed for a long time, the
43 waste designations and quantities present will remain the same as assigned at
44 the time of storage. Therefore, repeated analysis is not considered necessary
45 to ensure that waste designation data are representative.
46
47

48 **3.2 SELECTION OF SAMPLING EQUIPMENT**
49

50 The only analysis presently used in support of the PUREX Storage Tunnels
51 operation is for corrosivity on the final in-place aqueous rinse of discarded

1 vessels before the vessels are released for storage. The pH is determined by
2 Method 9040 or 9041 (SW-846). The RCRA sampling methods, as referenced in
3 WAC 173-303-110, will not be performed on any waste currently stored in the
4 PUREX Storage Tunnels.

5
6
7 **3.3 MAINTAINING AND DECONTAMINATING FIELD EQUIPMENT**

8
9 All RCRA sampling equipment used to collect and transport samples must be
10 free of contamination that could alter test results. Equipment used to obtain
11 and contain samples must be clean. Acceptable cleaning procedures for sample
12 bottles and equipment include, but are not limited to, washing with soap or
13 solvent, and steam cleaning. After cleaning, cleaning residues must be
14 removed from all equipment that could come into contact with the waste. One
15 method to remove these residues would be a solvent (acetone or other suitable
16 solvent) rinse followed by a final rinse with deionized water. Equipment must
17 be cleaned before use for another sampling event.

18
19 After completion of sampling, equipment should be cleaned as indicated
20 previously. If decontamination of the equipment is not feasible, the sampling
21 equipment should be disposed of properly.

22
23
24 **3.4 SAMPLE PRESERVATION AND STORAGE**

25
26 Following RCRA sampling, sample preservation follows methods set forth
27 for the specific analysis identified. Preservation is in accordance with the
28 methods stated in SW-846 or any of the test methods adopted by the Hanford
29 Facility that meet WAC 173-303 requirements. No preservation method will be
30 used when there are ALARA concerns.

31
32
33 **3.5 QUALITY ASSURANCE AND QUALITY CONTROL PROCEDURES**

34
35 The only test method presently used in support of the PUREX Storage
36 Tunnels operation is a corrosivity check on the final in-place aqueous rinse
37 of discarded vessels before the vessels are released for storage. The RCRA
38 sampling will not be performed on any waste currently stored in the PUREX
39 Storage Tunnels. Field duplicates, field blanks, trip blanks, and equipment
40 blanks will not be taken. Split samples could be taken at the request of
41 Ecology.

42
43 Generally, quality assurance and quality control (QA/QC) requirements for
44 sampling will be divided between paperwork requirements, such as chain-of-
45 custody, and sampling and analysis activities. This section addresses
46 sampling QA/QC requirements. Analytical QA/QC is discussed in Section 4.0.

47
48 A chain-of-custody procedure is required for all sampling identified by
49 this WAP. At a minimum, the chain of custody must include the following:
50 (1) description of waste collected, (2) names and signatures of samplers,

1 (3) date and time of collection and number of containers in the sample, and
2 (4) names and signatures of persons involved in transferring the samples.

3
4
5 **3.6 HEALTH AND SAFETY PROTOCOLS**

6
7 The safety and health protocol requirements established for the Hanford
8 Site must be followed for all RCRA sampling activities required by this WAP.

9
10 **4.0 LABORATORY SELECTION AND TESTING AND ANALYTICAL METHODS**

11
12
13 This section discusses laboratory selection and the types of acceptable
14 analytical methods for RCRA samples.

15
16
17 **4.1 LABORATORY SELECTION**

18
19
20 Laboratory selection is limited as only a few laboratories are equipped
21 to handle mixed waste because of the special equipment and procedures that
22 must be used to minimize personnel exposure to radiation. Laboratory
23 selection depends on laboratory capability, nature of the sample, timing
24 requirements, and cost. At a minimum, the selected laboratory must have the
25 following:

26
27 • A comprehensive QA/QC program (both qualitative and quantitative)
28 • Technical analytical expertise
29 • An effective information management system.

30
31 These requirements will be met if the selected laboratory follows the
32 pertinent requirements contained in the *Hanford Analytical Services Quality*
33 *Assurance Plan* (DOE/RL-94-55). The selected laboratory also can meet these
34 requirements by having some other type of QA/QC program as long as equivalent
35 data quality is achieved.

36
37
38 **4.2 TESTING AND ANALYTICAL METHODS**

39
40 The testing and analytical methods for corrosivity used by the various
41 onsite analytical laboratories are outlined in SW-846. These methods will in
42 some cases deviate from SW-846 and American Society for Testing and Materials-
43 accepted specifications for holding times, sample preservation, and other
44 specific analytical procedures. These deviations are discussed in *Analytical*
45 *Methods for Mixed Waste Analyses at the Hanford Site* (DOE/RL-94-97).

46
47
48
49 **5.0 WASTE RE-EVALUATION FREQUENCIES**

1 Re-evaluation of waste within the PUREX Storage Tunnels will not occur
2 because of high radiation levels and the way the railcars are positioned in
3 the tunnels. The waste is expected to remain stable.

4
5
6
7
8
9

6.0 SPECIAL PROCEDURAL REQUIREMENTS

10 The following sections describe special procedural requirements
11 associated with waste in the PUREX Storage Tunnels.

6.1 PROCEDURES FOR RECEIVING WASTES GENERATED OFFSITE

15 The PUREX Storage Tunnels do not accept waste generated off the Hanford
16 Site.

17
18

6.2 PROCEDURES FOR IGNITABLE, REACTIVE, AND INCOMPATIBLE WASTE

21 Presently, the only ignitable, reactive, or incompatible dangerous waste
22 stored in the PUREX Storage Tunnels is the silver nitrate coating on the
23 ceramic packing inside the silver reactors. This material is confined to the
24 interior of a large stainless steel vessel (Section 2.1.3) that separates this
25 material from all other waste material stored in the tunnel. The requirements
26 in WAC 173-303-395(1)(a) require 'No Smoking' signs be conspicuously placed
27 wherever there is a hazard present from ignitable or dangerous waste. 'No
28 Smoking' signs are not considered appropriate at the PUREX Storage Tunnels
29 because the tunnels are a designated radiation area. Smoking is not allowed
30 in any radiation area on the Hanford Site and rules prohibiting smoking are
31 strictly enforced. Because the posting of radiation area barriers serves to
32 achieve the no smoking intent of WAC 173-303-395(1)(a), posting and
33 maintaining 'No Smoking' signs are not considered appropriate.

34
35 Isolated areas within the PUREX Storage Tunnels have radiation levels in
36 excess of 5 roentgen per hour. Personnel entry into such radiation areas to
37 make periodic inspections [e.g., an annual fire inspection as required by
38 WAC 173-303-395(1)(d) for storage areas containing ignitable waste] would
39 be inconsistent with ALARA guidelines of the *Atomic Energy Act of 1954*.
40 Therefore, such inspections are not performed.

6.3 PROVISIONS FOR COMPLYING WITH LAND DISPOSAL RESTRICTION REQUIREMENTS

45 Operation of the PUREX Storage Tunnels does not involve land disposal or
46 treatment of dangerous waste. The information provided by the generating unit
47 regarding land disposal restrictions of dangerous waste is sufficient to
48 operate the PUREX Storage Tunnels in compliance with land disposal restriction
49 requirements. When final disposition of the waste occurs, this information
50 will be passed on for final treatment or disposal of the waste.

51

1 6.4 DEVIATIONS FROM THE REQUIREMENTS OF THIS PLAN

2 Management may approve deviations from this plan if special circumstances
3 arise that make this prudent. These deviations must be documented in writing
4 with a copy to be retained by the management.

5
6
7
8 7.0 RECORDKEEPING

9
10 Records associated with this waste analysis plan and waste verification
11 program are maintained on the Hanford Facility. These records will be
12 maintained until closure of the PUREX Storage Tunnels. Records associated
13 with the waste inventory will be maintained for 5 years.

14
15
16 8.0 REFERENCES

17
18
19 DOE/RL-94-55, *Hanford Analytical Services Quality Assurance Plan*, Rev. 2,
20 U.S. Department of Energy, Richland Operations Office, Richland,
21 Washington.

22
23 DOE/RL-94-97, *Analytical Methods for Mixed Waste Analyses at the Hanford Site*,
24 Rev. 0, U.S. Department of Energy, Richland Operations Office, Richland,
25 Washington.

26
27 EPA, 1986, *Test Methods for the Evaluation of Solid Waste: Physical/Chemical*
28 *Methods*, SW-846, 3rd ed., U.S. Environmental Protection Agency,
29 Washington, D.C.

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2
3
4
5

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Table 1. PUREX Storage Tunnels Inventory. (sheet 1 of 4)

PUREX #1 STORAGE TUNNEL (218-E-14)

TUNNEL IS AT ITS CAPACITY AS OF 1/22/65

PUREX #1 Storage Tunnel is located at the southeast end of the PUREX Plant and is an extention of the railroad tunnel. The storage area is approximately 109 meters long, 6.9 meters high and 5.8 meters wide. The tracks have a one percent down-grade toward the south end of the tunnel. The capacity of the Storage Tunnel is eight modified railroad cars, 12.8 meters long.

| position | | | |
|----------|--|------------------------|---------------------------|
| 1. & 2. | HA COLUMN AND MISC JUMPERS IN BOX PLACED IN TUNNEL #1 ON 6/60 HA 4,700 CU. FT., 400 CURIES, 5 rem/hr. @ 60', JUMPERS 2,190 CU. FT., 2,000 CURIES, Pb - 115 Kg. | JMP's | BOX H2-58373 HA-COLUMN |
| 3. | E-F11 #1 (1WW WASTE) CONCENTRATOR FAILED 7/24/60. PLACED IN TUNNEL #1 ON 7/29/60, 12.5 rem/hr. @ 100', 1,900 CU. FT., 40,000 CURIES AFTER FIFTY-FIVE MONTHS SERVICE. | 1WW | |
| 4. | G-F2 CENTRIFUGE. MISC JUMPERS IN BOX AND TWO TUBE BUNDLES. PLACED IN TUNNEL #1 ON 12/24/60 (FUG SER# 762) 2,465 CU. FT., 3,000 CURIES, Pb - 115 Kg., 1.5 rem/hr. @ 150'. | JMP's G E2 2 TBS | |
| 5. | E-H4 (3WB) CONCENTRATOR FAILED 1/4/61. PLACED IN TUNNEL #1 ON 1/4/61, 150 mrem/hr. @ 50', 2,336 CU. FT., 1,000 CURIES. AFTER FIVE YEARS SERVICE. | 3WB | |
| 6. | E-F6 (2WW WASTE) ORIGINAL CONCENTRATOR FAILED 4/21/61. PLACED IN TUNNEL #1 ON 4/21/61, 5 rem/hr. @ 20', 2,336 CU. FT., 700 CURIES. AFTER FIVE YEARS FOUR MONTHS SERVICE. | 2WW | |
| 7. | E-F11 (1WW WASTE) #2 CONCENTRATOR FAILED 2/1/62. PLACED IN TUNNEL #1 ON 2/8/62, 25 rem/hr. @ 150', 2,336 CU. FT., 40,000 CURIES. AFTER EIGHTEEN MONTHS SERVICE. | 1WW | |
| 8. | E-F6 (2WW WASTE) #3 SPARE CONCENTRATOR FAILED 5/23/64. PLACED IN TUNNEL #1 ON 1/22/65 FLAT CAR 3821. 2,400 CU. FT., 700 CURIES, 5 rem/hr. @ 20'. | 2WW | |

Table 1. PUREX Storage Tunnels Inventory. (sheet 2 of 4)

PUREX #2 STORAGE TUNNEL (218-E-15)

PUREX #2 Storage Tunnel is located at the southeast end of the PUREX Plant and is an extention of the railroad tunnel. The storage area is approximately 514.5 meters long, 7.9 meters high and 10.4 meters wide. The tracks have a one percent down-grade toward the south end of the tunnel. The capacity of the Storage Tunnel is 38-40 modified railroad cars, 12.8 meters long. The Tunnel contains 21 cars as of 2/95.

| position | contents | car diagrams |
|----------|---|--------------|
| 1. | E-F6 # (2WW WASTE) CONCENTRATOR, TK F 15-2, ONE TUBE BUNDLE AND AGITATOR MOTORS PLACED IN TUNNEL ON 12/12/67 ON CAR 61439 2,400 CU. FT., 700 CURIES, 1.3 rem/hr. @ 100'. | |
| 2. | E-F6 #5 (E-H4 3WB) CONCENTRATOR, TWO TUBE BUNDLES PLACED IN TUNNEL ON 3/26/69 ON CAR MILW 60883 2,400 CU. FT., 500 CURIES, 800 mrem/hr. @ 2'. | |
| 3. | E-F6 #6 (2WW WASTE) CONCENTRATOR, TWO TUBE BUNDLES FAILED PLACED IN TUNNEL ON 3/19/70 ON CAR 3612. 2,400 CU. FT., 700 CURIES, 500 rem/hr. @ 2'. | |
| 4. | L CELL PACKAGE IN A SEALED STEEL BOX (H2-66012) PLACED IN TUNNEL ON 12/30/70 ON CAR MILW 60033 2,400 CU. FT., 500 GRMS Pu, 200 mrem/hr. @ CONTACT. | |
| 5. | F2 SILVER REACTOR, F6 DEMISTER, VESSEL VENT LINE STEEL CAT-WALK AND GUARD RAILS. PLACED IN TUNNEL ON 2/26/71 ON GONDOLA CAR 4610. 2,400 CU. FT., 20 CURIES, Ag - "625 Kg, 2 rem/hr. @ CONTACT. | |
| 6. | MODIFIED A3-1 TOWER, SCRUBBER, LID AND VAPOR LINE PLACED IN TUNNEL ON 12/12/71 ON GONDOLA CAR 4611. 2,400 CU. FT., 10 CURIES, 1 rem/hr. @ CONTACT. | |
| 7. | A3 DISSOLVER PLACED IN TUNNEL ON 12/22/71 ON NINE FT. SHORTENED CAR B58 2,400 CU. FT., 50 CURIES, Hg - "45 Kg, 5 rem/hr. @ 5'. | |
| 8. | A1W1 FUEL ENDS IN STEEL LINER BOX AND NPP FUEL HANDLING EQUIP. USED WITH THE SUSPECTED CANISTERS, ON CAR 19808 PLACED IN TUNNEL ON 8/29/72. 800 CU. FT., 17,500 CURIES, 10 rem/hr. @ 150'. | |
| 9. | C3 DISSOLVER PLACED IN TUNNEL ON 9/30/72 ON CAR 19811 1590 CU. FT., 50 CURIES, Hg - "45 Kg, 5 rem/hr. @ 5'. | |
| 10. | E-H4 (3WB) CONCENTRATOR, #61 TUBE BUNDLE, PROTOTYPE COOLING COIL AND A F-F1 FILTER TANK. PLACED IN TUNNEL 8/30/83 ON CAR CDX-1. 2,400 CU. FT., 500 CURIES, 800 mrem/hr. @ 2'. | |
| 11. | A3 DISSOLVER (VESSEL #10 AND HEATER VESSEL #6) PLACED IN TUNNEL ON 1/18/86 ON CAR 3613 3,960 CU. FT., 0.81 CURIES, Hg - "40 Kg, Cd - "43 Kg, 3 mrem/hr. @ 3'. | |
| 12. | WHITE BOX (H2-58456) CONTAINING EIGHT TUBE BUNDLES #S 57, 60, 62, 64, 67, 68, 74, AND 76 PULSER #5 AND OLD HEATER DISS LID OLD STYLE DUMPING TRUNNIONS (9). PLACED IN TUNNEL ON 1/20/86 ON CAR 3611. 5,438 CU. FT., 540 CURIES, 2 rem/hr. @ 3'. | |

Table 1. PUREX Storage Tunnels Inventory. (sheet 3 of 4)

PUREX #2 STORAGE TUNNEL (218-E-15)

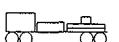
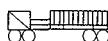
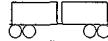
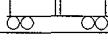
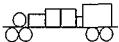
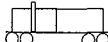
| position | |
|----------|---|
| 13. | J5 TANK (VESSEL #30). F1 COND (VESSEL #13) AND F12-B CELL BLK, OLD FOUR-WAY DUMPER, DISS YOKE AND FLANGE PLATE, 3 rem/hr. @ 1'. PLACED IN TUNNEL ON 1/21/86 ON CAR 19806, 2,500 CU. FT., 90 CURIES.  |
| 14. | L-1 PULSER, 2-COLUMN CARTRIDGES, 1-JUMPER CUTTER, 3-JUMPER ALIGNMENT TOOLS, 9-EXTERIOR DUMPING TRUNNIONS, 10-PUMPS, 3-AGITATORS, 4-TUBE BUNDLES, 2-VENT JUMPERS AND 7-YOKES. PLACED IN TUNNEL ON 11/18/87 ON CAR PX-10 (10A-19380) & RACK H2-96629.50, 50 TONS, 3,600 CU. FT., 33,740 CURIES (REF: LETTER 12110-88-074), Pb - "2540 Kg., 5 rem/hr. @ 1'.  |
| 15. | SILVER REACTOR, E-F2 STEAM HEATER AND STORAGE LINER (H2-65095) FULL OF CUT UP JUMPERS PLACED IN TUNNEL ON 5/13/88 ON CAR PX-9 (10A-19809) & S/R CRADLE SK-GLR-11-2-87, 20 TONS, 2,775 CU. FT., 240 CURIES (REF: LETTER 12110-88-074), Cd - "13 Kg., Ag - "115 Kg., Pb - "230 Kg., 20 rem/hr. @ 20'.  |
| 16. | E-J8-1 UNITIZED CONCENTRATOR VESS #1 H2-52477, FAILED 3/11/89 PLACED ON STORAGE CAR H2-96008, PX-6 (10A-19028) AND INTO #2 TUNNEL 4/6/89 GRAVEYARDS. EST. 42 TONS, 6,000 CU. FT. 1.5 CURIES (REF: LETTER 12113-89-027), 0.5 rem/hr. @ 10'.  |
| 17. | NORTH STORAGE LINER H2-65095 CONTAINING SIX PUMPS, ONE AGITATOR AND CUT UP JUMPER (14 TONS), SOUTH STORAGE LINER H2-65095 CONTAINING ONE PUMP, ONE #15 YOKE AND CUT UP JUMPERS (11.5 TONS), PLACED ON STORAGE CAR PX-19 (10A-19830) AND INTO #2 TUNNEL 8/5/89 DAYS. EST 25.5 TONS, 2,574 CU. FT. 3.0 CURIES (REF: LETTER 12113-89-051), 80 rem/hr. @ 1'.  |
| 18. | T-F5 ACID ABSORBER, ID#1-T-F5/F-168713, H2-52535 AND H2-52487/488. PLACED ON STORAGE CAR PX-2 AND INTO #2 TUNNEL 4/8/94. EST 22 TONS, 835 CU. FT., 185 CURIES, 90 rem/hr. @ CONTACT.  |
| 19. | FOUR METAL LINER STORAGE BOXES H-2-65095/J-2-100187-0 CONTAINING FAILED JUMPERS AND MISCELLANEOUS OBSOLETE CANYON EQUIPMENT ITEMS. PLACED ON STORAGE CAR PX-23 AND INTO #2 TUNNEL 9/16/94. EST 60 TONS, 4032 CU. FT., 927 CURIES, 30 rem/hr. @ 2'.  |
| 20. | E-H4-1 UNITIZED CONCENTRATOR (H-2-52477/56213)/(E-H4-1). PLACED IN TUNNEL ON 1/27/95 ON CAR PX-28. EST 40 TONS, 5,760 CU. FT., 3,070 CURIES, Cd - "8 Kg., 1000 rem/hr. @ 5'.  |
| 21. | TANK E-5 (H-2-52453)/(F-166955), LEAD STORAGE BOX ASSEMBLY (H-2-131629)/(H-2-131629-1), H4 CONCENTRATOR TOWER (H-2-58102)/(F-223017-CBT-4), HOT SHOP COVER PLATE (H-2-52222)/(C*), TUBE BUNDLE WASH CAPSULE (H-2-58647), DISSOLVER CHARGING INSERT (H-2-76975)/(H-2-75876-1), LIFTING YOKE #7A (H-2-96837), LIFTING YOKE #9 (H-2-52458). PLACED IN TUNNEL ON 2/8/95 ON CAR PX-3609. EST 44 TONS, 3,457 CU. FT., 26,000 CURIES, Pb - "1930 Kg., 1000 rem/hr. @ 4'.  |

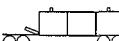
Table 1. PUREX Storage Tunnels Inventory. (sheet 4 of 4)

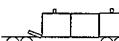
PUREX #2 STORAGE TUNNEL (218-E-15)

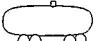
position

22. METAL LINER BOX (H-2-65095) CONTAINING JUMPERS AND FAILED/ OBSOLETE CANYON EQUIPMENT, F7 NEUTRON MONITOR (H-2-75825), LEAD STORAGE BOX (H-2-131629) CONTAINING JUMPER COUNTERWEIGHTS AND MISCELLANEOUS LEAD ITEMS, SCRAP HOPPER (H-2-57347) CONTAINING MISCELLANEOUS CANYON EQUIPMENT, CANISTER CAPPING STATION (H-2-821891), TEST CANISTER CONTAINING VARIOUS LENGTHS OF CARBON STEEL PIPE. PLACED IN TUNNEL 3-11-96 ON CAR #3616. ESTIMATED WEIGHT 22 TONS, 1,712 CU. FT., 16 CURIES, Pb - "8,232 Kg., Cd - "2 Kg., 100 mrem/hr. @ 1'. 

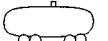
23. TWO BURIAL BOXES (H-2-100187) CONTAINING JUMPERS AND FAILED/ OBSOLETE CANYON EQUIPMENT, LIFTING YOKE (H-2-99652). PLACED IN TUNNEL 3-11-96 ON CAR #PX-31. ESTIMATED WEIGHT 21 TONS, 2,116 CU. FT., 2 CURIES, 10 mrem/hr. @ 1'. 

24. CONCRETE BURIAL BOX (H-1-44980) STORING 8 CONTAINERS OF 324 BUILDING, B-CELL WASTE. FOR ADDITIONAL DETAILS, SEE PUREX WORK PLAN WP-P-95-60. PLACED IN TUNNEL ON CAR #PX-29, ON APRIL 26, 1996. ESTIMATED WEIGHT 36 TONS, 1,890 CU. FT., < 244,000 CURIES, ~15 mrem/hr. @ 150'. Pb - "1,802 Kg., Cd - ~10.5 kg., absorbed oil - ~8.5 kg., Cr - ~1 kg., Ba - ~3 kg, ~24 g Pu. 

25. CONCRETE BURIAL BOX (H-1-44980) STORING 9 CONTAINERS OF 324 AND 325 BUILDING WASTE. FOR ADDITIONAL DETAILS, SEE PUREX WORK PLAN WP-P-96-015. PLACED IN TUNNEL ON CAR #10A-3619, ON JUNE 12, 1996. ESTIMATED WEIGHT 46.5 TONS, 1,890 CU. FT., < 1.75 M CURIES, "200 mrem/hr. @ 150'. Ba - "4 g., Cd - <1 g., Cr - "2 g., Pb - < 1 g, "43 g Pu. 

26. 20,000 GALLON LIQUID WASTE TANK CAR HO-10H-18580, EMPTY PER RCRA, PLACED IN TUNNEL ON JUNE 19, 1996, APPROXIMATELY 30 TONS, 5 CURIES, 100 mrem/hr. @ 3', "53 g Pu. 

27. 20,000 GALLON LIQUID WASTE TANK CAR HO-10H-18579, EMPTY PER RCRA, PLACED IN TUNNEL ON JUNE 19, 1996, APPROXIMATELY 30 TONS, 9 CURIES, 300 mrem/hr. @ 3', "131 g Pu. 

28. 20,000 GALLON LIQUID WASTE TANK CAR HO-10H-18582, EMPTY PER RCRA, PLACED IN TUNNEL ON JUNE 19, 1996, APPROXIMATELY 30 TONS, 23 CURIES, 650 mrem/hr. @ 3', "11 g Pu. 

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APPENDIX 4A

ENGINEERING DRAWINGS

1 APPENDIX 4A
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7 ENGINEERING DRAWINGS
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As-built drawings (aperture cards) for the PUREX Storage Tunnels:

H-2-55587 218-E-14 Structural Floor Plan and Section, Rev. 7
H-2-55588 Structural Sections and Details: Disposal Facility for Failed Equipment, Rev. 7
H-2-55589 Structural Sections and Details: Disposal Facility for Failed Equipment, Rev. 2
H-2-55590 Door and Hoist Details
H-2-55591 Door and Hoist Details
H-2-55592 Door and Hoist Details
H-2-55593 Electrical Details
H-2-55594 Shielding Door Fill and Drain Lines Arrangement: Disposal Facility for Failed Equipment, Rev. 2
H-2-55599 Electrical Door Control Plan, Elementary Diagram and Miscellaneous Details: Disposal Facility for Failed PUREX Equipment, Rev. 2
H-2-58134 Ventilation Details (sheets 1 and 2)
H-2-58175 PUREX Tunnel: As Built, May 1962, Rev. 2
H-2-58193 Sump Details
H-2-58194 Sump Details
H-2-58195 Structural Sections and Details: Equipment Disposal - PUREX, Rev. 1
H-2-58206 Sump Details
H-2-58208 Fan Details
H-2-94756 Filter Details

Note: These drawings are under revision to reflect current configuration.
Revised drawings will be submitted through a Class 1 Modification.

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APPENDIX 7A

UNIT-SPECIFIC CONTINGENCY PLAN FOR THE 218-E-14 AND 218-E-15 STORAGE TUNNELS

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APPENDIX 7A

4 The building unit-specific contingency plan is updated annually. Future
5 updates will reflect terminology consistent with the permit application.

Document Title: UNIT-SPECIFIC CONTINGENCY PLAN FOR THE 218-E-14 and
218-E-15 STORAGE TUNNELS

Prepared by:

C.N. Villalobos
C.N. Villalobos, Engineer
PUREX Facility Stabilization Project

4-2-97

Date

Approved by:

R.W. Bailey
R.W. Bailey, Manager
PUREX Facility Stabilization Project

4/2/97

Date

Approved by:

C.J. LeBaron
C.J. LeBaron, Officer
PUREX Regulatory Compliance Officer

3 APR '97

Date

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1.0 GENERAL INFORMATION (G-1)

The PUREX Storage Tunnels are located in the 200 East Area of the 1,450-square kilometer U.S. Department of Energy, Richland Operations Office (DOE-RL) operated Hanford Site in southeastern Washington State. This unit-specific contingency plan describes the basic responses to upset and/or emergency conditions for the Plutonium-Uranium Extraction (PUREX) 218-E-14 and 218-E-15 Storage Tunnels. This plan in conjunction DOE/RL-93-75, *Hanford Facility Contingency Plan* meet the requirements of contingency planning as required by WAC 173-303.

1.1 FACILITY NAME: U.S. Department of Energy Hanford Site
PUREX Storage Tunnels.

1.2 FACILITY LOCATION: Benton County, Washington; within the 200 East Area. Structures covered by this plan are:

218-E-14 Tunnel Number 1
218-E-15 Tunnel Number 2

1.3 OPERATOR: U.S. Department of Energy
Richland Operations Office
825 Jadwin Avenue
Richland, Washington 99352

1.4 CO-OPERATOR: Fluor Daniel Hanford, Inc.
P.O. Box 1000
Richland, WA 99352-1000

1.5 DESCRIPTION OF FACILITY OPERATIONS

The PUREX Storage Tunnels consist of two structures, 218-E-14 (Tunnel Number 1) and 218-E-15 (Tunnel Number 2). The tunnels are used for the storage of material from the PUREX Plant and from other onsite sources. The material stored in the tunnels contains dangerous waste and varying amounts of radioactive contamination; therefore, the stored material is managed as mixed waste. Tunnel Number 1 is filled to capacity. Tunnel Number 2 currently has storage positions available and may continue to receive mixed waste from the PUREX Plant and other onsite sources until the tunnel is either filled to capacity or a determination is made that waste will no longer be received.

Mixed waste is stored in the PUREX Storage Tunnels on railcars that are modified to serve as both transporter and storage platforms. Each railcar is retrievable. However, because the railcars are stored on a single, dead-end railroad spur inside each storage tunnel, the railcars can be removed only in reverse order (i.e., last in, first out).

1.6 SITE PLAN/EVACUATION ROUTE

The PUREX Storage Tunnels Site Plan and evacuation route are shown in Figure 1. During an emergency, personnel that enter the storage tunnels during material placement, operations will evacuate via the north end of the railroad tunnel, through the pedestrian door.

2.0 EMERGENCY COORDINATORS (G-2)

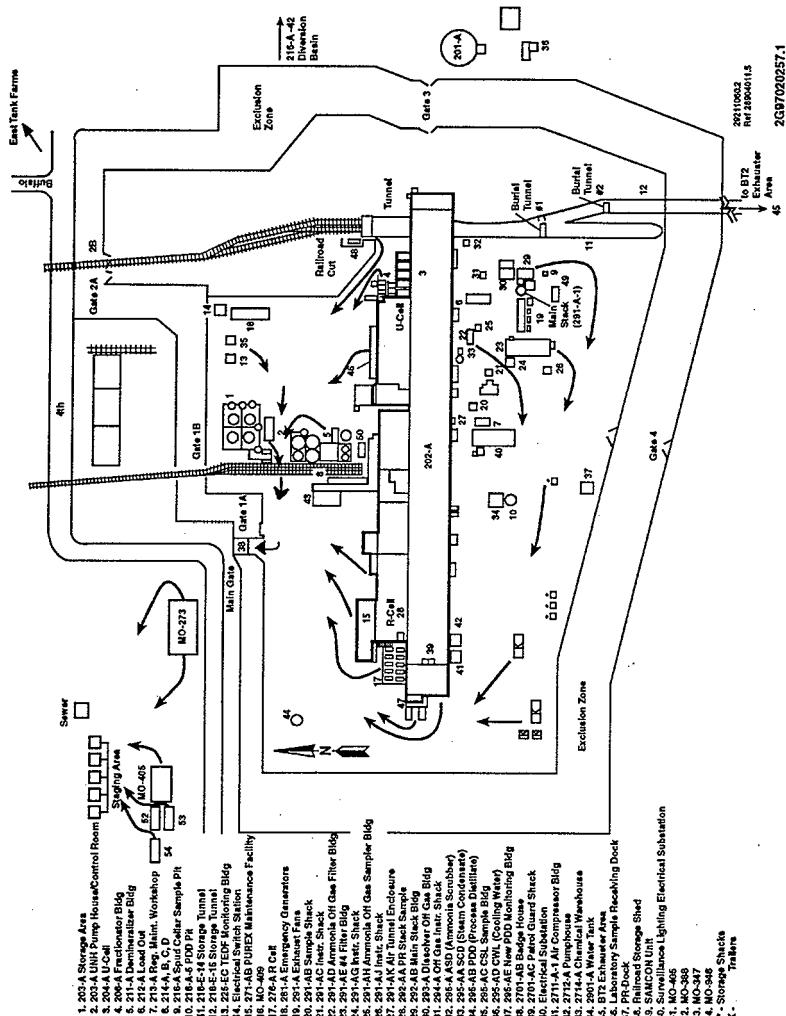
| Emergency coordinator ^a | | | |
|------------------------------------|-----------------------|---------------|------------|
| Designation | Job title | Work location | Work phone |
| Primary | PUREX Project Manager | M0-273 | 373-4999 |
| Alternate | Team Leader | M0-273 | 373-4134 |
| Alternate | Team Leader | M0-273 | 373-1781 |

^aThe names and home phone numbers of all Emergency Coordinators are maintained at the single point-of-contact (the Hanford Patrol Operations Center) telephone number 373-3800 in accordance with the Hanford Facility RCRA Permit, Dangerous Waste Portion, General Condition II.A.4.

UNIT-SPECIFIC CONTINGENCY PLAN FOR
THE 218-E-14 AND 218-E-15 STORAGE
TUNNELS

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Issue Date April 2, 1997

Figure 1. PUREX Storage Tunnels Site Plan and Evacuation Route.



3.0 IMPLEMENTATION OF THE PLAN (G-3)

Potential emergency conditions could include any of the following three basic categories:

- (1) Operational (e.g., damaged waste shipment)
- (2) Natural phenomena (e.g., earthquakes)
- (3) Security contingencies (e.g., bomb threat).

Any of these conditions could lead to an emergency situation and require the implementation of this plan. Each incident will be classified for both DOE Order and RCRA purposes. The RCRA classification will be accomplished in accordance with DOE/RL-93-75, *Hanford Facility Contingency Plan*, Section 5.1.5.

3.1 DANGEROUS AND/OR MIXED WASTE RELEASE

A seismic event, explosion, tornado, or an aircraft crash could cause damage to the storage tunnels and could involve environmental exposure to mixed waste.

Emergency responses for dangerous and/or mixed waste releases can be found in DOE/RL-93-75, *Hanford Facility Contingency Plan*, Section 5.0.

3.2 FIRE OR EXPLOSION

The fire hazard associated with the PUREX Storage Tunnels is considered to be very low because of the minimal amount of combustibles stored within the tunnels and the lack of an ignition source.

Because of the extremely remote potential for mixed waste to leach, water is not the preferred choice for fire control. Reduction of the air supply to the storage area by isolation of the tunnel exhaust system, if operating, should permit a fire to self-extinguish. Should the fire continue to spread, heavy equipment and cranes will be called to the scene to cover areas of the tunnels that might collapse.

Depending on the magnitude of a natural phenomena event, fire, or explosion, damage to the storage tunnels is possible. The hazards could involve personnel and environmental exposure to mixed waste. In the event of such an occurrence, a recovery plan will be developed in accordance with DOE/RL-93-75, *Hanford Facility Contingency Plan*, Section 6.0. The recovery plan will take into consideration methods, if any, for retrieval of the waste stored within the tunnels.

Additional emergency responses for fires and explosions can be found in DOE/RL 93-75, *Hanford Facility Contingency Plan*, Section 5.4.

3.3 SEISMIC EVENT

Depending on the magnitude of the seismic event, damage to the storage tunnels is possible. The hazards could involve personnel and environmental exposure to mixed waste.

Emergency responses for seismic events can be found in DOE/RL-93-75, *Hanford Facility Contingency Plan*, Section 5.0.

3.4 AIRCRAFT CRASH

In addition to the potential for serious injuries or fatalities involved with an aircraft crash, damage to the storage tunnels is possible, which could result in a fire, explosion, or a mixed waste release.

Emergency responses for fires, explosions, and dangerous and/or mixed waste releases can be found in DOE/RL-93-75, *Hanford Facility Contingency Plan*, Section 5.0.

3.5 BOMB THREAT/EXPLOSIVE DEVICE

Depending on the magnitude of an explosion, damage to the storage tunnels is possible. The hazards could involve personnel and environmental exposure to mixed waste. For emergency responses, refer to Section 3.2 of this plan for explosions.

3.6 DAMAGED DANGEROUS AND/OR MIXED WASTE SHIPMENT

In the event that a mixed waste shipment is damaged or otherwise presents a hazard to the public health and the environment, the damaged shipment should not be moved. Emergency responses for damaged waste shipments can be found in DOE/RL-93-75, *Hanford Facility Contingency Plan*, Section 5.8.

4.0 UNIT/BUILDING EMERGENCY RESPONSE PROCEDURES

The initial response to any emergency is to immediately protect the health and safety of persons in the area. Identification of released material is essential to determine appropriate protective actions. Containment, treatment, and disposal assessment are secondary responses.

The preceding sections describe the process for implementing basic protective actions as well as descriptions of response actions for events.

4.1 NOTIFICATION (G-4a)

Procedures and methods for immediate notification following an imminent or actual emergency are found in DOE/RL-93-75, *Hanford Facility Contingency Plan*, Section 9.0.

4.2 IDENTIFICATION OF RELEASED/SPILLED MATERIALS

Methods for identifying the character, source, amount, and a real extent of any materials when there has been a release or spill to the environment, a fire, or an explosion is outlined in DOE/RL-93-75, *Hanford Facility Contingency Plan*, Section 5.1.4.

4.3 HAZARD ASSESSMENT AND REPORT

The Building Emergency Director (BED) will assess the possible hazards to human health and the environment that might result from a fire, a release, a spill, or an explosion, considering direct, indirect, immediate, and long-term effects as outlined in DOE/RL-93-75, *Hanford Facility Contingency Plan*.

Procedures and methods for immediate notification following an emergency are found in Section 4.1.

4.4 PREVENTION OF RECURRANCE OR SPREAD OF FIRES, EXPLOSIONS, RELEASES

The BED, in coordination with emergency response organizations, takes the steps necessary to ensure that a secondary release, fire, or explosion does not occur. The following actions are taken:

- Isolate the area of the initial incident by shutting off power, closing off ventilation systems, if still operating, etc., to minimize the spread of a release and/or the potential for a fire or explosion
- Inspect surface of the tunnels for leaks, cracks, or other damage
- Contain and isolate residual mixed waste material
- Cover or otherwise stabilize areas where residual released mixed waste remains to prevent migration or spread from wind or precipitation run-off
- Install new structures, systems, or equipment to enable better management of mixed waste
- Reactivate adjacent operations in affected areas only after cleanup of residual mixed waste is achieved.

4.5 POST-EMERGENCY ACTIONS (G-4f)

It is a function of the BED (Emergency Coordinator) to declare the termination of an event, as outlined in DOE/RL-93-75, *Hanford Facility Contingency Plan*, Section 6.1. However, in an event where additional emergency centers are activated only the highest activated level of the emergency organization, in conjunction with the BED, will declare that an event has ended.

5.0 EMERGENCY EQUIPMENT (G-5)

Because personnel only enter the storage tunnels during material placement operations, no permanent emergency equipment, communications equipment, warning systems, personal protective equipment, or spill control and containment supplies are located in the tunnels.

During storage tunnel operations, personnel use portable emergency equipment. Also, for such operations, work plans are followed and pre-job safety meetings conducted.

6.0 COORDINATION AGREEMENTS (G-6)

The DOE-RL has established a number of coordination agreements, or memoranda of understanding (MOU) with various agencies to ensure proper response resource availability for incidents involving the Hanford Site. A description of the agreements is contained in DOE/RL-93-75, *Hanford Facility Contingency Plan*, Section 8.0.

7.0 EVACUATION (G-7)

Personnel that enter the storage tunnels during material placement operations will evacuate via the north end of the railroad tunnel, through the pedestrian door (Figure 1).

8.0 REQUIRED REPORTS (G-8)

Three types of written post-incident reports are required for incidents on the Hanford Site. The reports are summarized in DOE/RL-93-75, *Hanford Facility Contingency Plan*, Section 9.0.

9.0 REFERENCES

DOE/RL-93-75, *Hanford Facility Contingency Plan*, U.S. Department of Energy, Richland, Washington.

**UNIT-SPECIFIC CONTINGENCY PLAN FOR
THE 218-E-14 AND 218-E-15 STORAGE
TUNNELS**

Document HNF-IP-0603-218-E-14/15
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APPENDIX 8A

DANGEROUS WASTE TRAINING PLAN FOR THE PUREX FACILITY

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**DANGEROUS WASTE TRAINING PLAN
for the
PUREX FACILITY**

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4/4/97
Date

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4/4/97
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4 APR '97
Date

1.0 INTRODUCTION

The PUREX Facility consists of two separate treatment, storage, and/or disposal (TSD) units, the PUREX Plant and the PUREX Storage Tunnels. The PUREX Plant is permitted for storage and treatment of dangerous and/or mixed waste. The PUREX Storage Tunnels are permitted as a miscellaneous unit for the storage of dangerous and/or mixed waste.

This PUREX Facility Training Plan in conjunction with Chapter 8.0 of the *Hanford Facility Dangerous Waste Permit Application, General Information Portion*, (DOE/RL-91-28), complies with the requirements of Washington Administrative Code (WAC), Chapter 173-303, "Dangerous Waste Regulations." Training records associated with personnel identified in this plan are maintained in the PUREX Regulatory file.

This training plan describes general requirements, worker categories, and provides course descriptions for operation of the two TSD units and the less than 90-day accumulation areas.

2.0 TRAINING PROGRAM

Centralized training organizations are responsible for developing the overall Hanford Facility training program of classroom instruction and maintaining training records. The project manager is responsible for developing a program for unit/building-specific training supplementing the general Hanford Facility classroom program. General requirements of a training program include:

- a. Instructing personnel to perform duties in compliance with the "Dangerous Waste Regulations", WAC 173-303.
- b. Instruction by a person knowledgeable of dangerous waste management procedures that includes training relevant to the employee's position.
- c. A unit/building-specific program that includes instruction to familiarize personnel with applicable procedures (inspection plans, operating procedures, etc.), container management practices, spill response, and emergency procedures. Refresher training must be given annually to personnel. An annual review of the contingency plan and the emergency procedures maintained at the unit/building will satisfy the spill response and emergency procedures review.
- d. New employees must receive training within 6 months of employment or transfer, and must be supervised until completion of training.
- e. Employees must receive appropriate annual refresher training.

3.0 TRAINING PLAN CONTENT REQUIREMENTS

In accordance with the requirements in WAC 173-303-330(2), a training plan must contain the following:

1. For each position related to dangerous waste management at the facility, the job title, the job description, and the name of the employee filling each job. The job description must include the requisite skills, education, other qualifications, and duties for each position.
2. A written description of the type and amount of both introductory and continuing training required for each position.
3. Records documenting that facility personnel have received and completed the training required by this section.

The following three sections describe how these requirements are met for the PUREX Facility.

3.1 Job Title, Job Description, and Names of Employees

Personnel who are associated with dangerous waste management at the PUREX Facility are maintained in this training plan in Appendix A. Personnel are placed into the following five general worker categories to properly assign the correct training that is commensurate with their duties and responsibilities. Personnel duties and responsibilities may overlap between categories. When overlaps occur, personnel will complete appropriate training pertaining to courses applicable from each category. The determining factor for placing specific personnel within any of the worker categories is the corresponding job duties. The five worker categories are as follows:

1. All Employees
2. General Worker
3. Advanced General Worker
4. General Manager
5. General Shipper.

The duties corresponding to these categories are contained in Table 1. The descriptions of job duties for each category are general in nature. However, the descriptions do provide adequate specifics that can be matched to individual job titles or job positions commonly found at the Hanford Facility. The responsibilities for personnel categorized as Advanced General Worker, General Manager, and General Shipper are provided since these categories are directly associated with the safe and compliant management of dangerous and/or mixed waste at the PUREX Facility. Since personnel categorized as All Employees and

General Workers are not directly related to the safe and compliant management of dangerous and mixed waste at the PUREX Facility, these personnel are not maintained in Appendix A.

All personnel are assigned a job title (from the salaried nonexempt or bargaining unit classifications) or position (from the exempt classifications). The job or position descriptions include applicable requisite skills, work experience, education, and other qualifications, and a brief list of duties and/or responsibilities for each job title or position. Information regarding work experience, education, and other qualifications required for each position is maintained by B&W Hanford Co. Human Resources Department.

Personnel assigned duties as a Dangerous Waste Worker will be removed from that assignment if their training goes delinquent. Upon requalification, the person could resume previously assigned duties.

Table 1. Worker Categories

| WORKER CATEGORIES | GENERATOR JOB DUTIES | PERSONNEL JOB TITLES ¹ |
|-------------------------|---|--|
| ALL EMPLOYEES | Is not categorized as a General Worker, Advanced General Worker, General Manager, or General Shipper. | Administrative personnel Touring visitors Oversight personnel |
| GENERAL WORKER | Generates dangerous waste and places waste into appropriate containers. Waste management activities are overseen by person-in-charge or other PUREX Facility personnel. Contingency plan duties are to immediately evacuate incident area and report incident to appropriate personnel. Duties and responsibilities would not exceed those stated above. | Maintenance personnel Health physics technicians Contractor crafts Truck drivers Power operators |
| ADVANCED GENERAL WORKER | Duties include the management of dangerous waste in tanks, containers, containment buildings, and storage tunnels. Selects, packages, or prepares containers of dangerous waste for movement including proper marking and labeling of containers. Performs inspections and operates the TSD unit. Samples containers of dangerous waste or prepares samples for delivery to a laboratory. Contingency plan duties include responding to small spills in accordance with procedures. | Operators |
| GENERAL MANAGER | Environmental Compliance Officer, someone who can act as the Building Emergency Director, or someone who directs Advanced General Workers in accumulation of dangerous waste. Responsible for the accountability and directing of employees during dangerous waste emergency events. | Building Emergency Director Manager or Team Leader of Advanced General Worker Environmental Compliance Officer |

| WORKER CATEGORIES | GENERATOR JOB DUTIES | PERSONNEL JOB TITLES ¹ |
|-------------------|---|-----------------------------------|
| GENERAL SHIPPER | Duties include the preparation and shipment of dangerous or mixed waste containers in compliance with applicable requirements. Directs General and Advanced General Workers in dangerous and/or mixed waste management and/or transportation activities. Authorized individual for signing offsite waste manifests and onsite waste movement documentation. | Hazardous Material Specialist |

¹Duties and responsibilities of personnel must be compared to the table.

In general, all personnel require a high school diploma or General Equivalent Diploma. Personnel filling exempt management or engineering positions may require a college degree with 2 or more years of industry experience. Many prerequisites exist for these positions. In some cases, a college degree may be waived as a prerequisite requirement. An equivalent combination of education and experience also may be accepted. Additional information on specific prerequisites can be provided upon request. The following sections describe within the appropriate worker category, the job titles and a brief position description of personnel at the PUREX Facility who are categorized as Advanced General Workers, General Managers, and General Shippers.

3.1.1 PUREX Facility Advanced General Workers

3.1.1.1 PUREX Facility Operators

Responsibilities of Operators may include the following:

- Perform work activities in accordance with current operating procedures
- Perform sampling as required by procedure
- Conduct routine surveillance of waste treatment and storage vessels, containment buildings and storage tunnels
- Respond to alarms, dangerous waste leaks or spills
- Respond to off-normal and/or emergency conditions according to established procedures

Responsibilities of PUREX Facility Container Management Operators may include the following:

- Receive, segregate, sort, inventory, store, and stage dangerous waste

- Provide surveillance of less than 90-day accumulation areas for off-normal conditions.
- Assist truck drivers in loading and unloading
- Ensure that trucks transporting dangerous waste are properly placarded
- Respond to dangerous waste leaks or spills
- Ensure that the waste has been properly secured in the transportation vehicle.

3.1.2 PUREX Facility General Managers and Team Leaders

3.1.2.1 PUREX Facility Emergency Coordinator/Alternates

Responsibilities and duties of the Emergency Coordinator and the alternates may include the following:

- Function as the Emergency Coordinator as defined in WAC 173-303-360.
- Determine if a RCRA contingency plan has been implemented during the course of an incident or process upset.
- Ensure all reports to Ecology have been made after an incident or process upset has occurred.
- Become thoroughly familiar with the TSD units' Contingency Plan, operations, activities, location and properties of all wastes handled, location of all records, and the layout of the TSD unit.

3.1.2.2 PUREX Facility Environmental Compliance Officer

Responsibilities may include the following:

- Provide support to management to ensure compliance with the applicable environmental compliance requirements, environmental permits, and compliance orders
- Ensure that management is aware of the TSD units' environmental compliance status and environmental compliance activities.
- Understand and be able to explain the environmental compliance status of the TSD units with all applicable environmental requirements

- Advise management of new environmental requirements and policies, the associated impacts, and recommend implementation mechanisms to ensure compliance

3.1.3 PUREX Facility General Shipper

3.1.3.1 Hazardous Material Specialist

- Provide technical direction for handling, storage, transportation, and disposal of hazardous materials dangerous and/or mixed waste.
- Sign waste manifests and other waste movement documentation
- Perform weekly inspections of 90-day and satellite accumulation areas
- Direct/coordinate RCRA sampling for containerized waste
- Write/implement plant operation procedures for the proper handling, storage, and disposal of solid waste
- Provide direction for response to dangerous and/or mixed waste leaks or spills

3.2 Written Description of the Type and Amount of Training

Based on the categorization of personnel to the worker categories, the appropriate courses are chosen. The following courses may be assigned as a requirement by worker category, to help ensure the correct course is assigned. The course descriptions contain additional information concerning the course. Courses applicable to all personnel categorized as Advanced General Workers, General Managers, and General Shippers are listed in Appendix A.

3.2.1 Worker Category Courses

- All Employees
Hanford General Employee Training (HGET) - 000001
Retraining: 12 Months
PUREX Complex Orientation - 250701
Retraining: 12 Months
- General Workers
Waste Management Awareness - 02006G
Retraining: N/A - one time only

- Unit/building-specific contingency plan training (training waived when escorted by qualified PUREX personnel) - 03E024
Retraining: 12 Months
Advanced General Workers, General Managers,
General Shippers
- Courses are identified in Appendix A.

3.2.2 Emergency Response Training

Federal and state regulations require that personnel be able to respond effectively to emergencies. In accordance with WAC 173-303-330(1)(d), personnel are trained on emergency equipment, systems, and procedures. PUREX Facility operations involve the management of dangerous waste within containers, tanks, containment building, and storage tunnels. Table 2 indicates requirements from WAC 173-303-330(1)(d) that are applicable to each TSD unit operation. Specific topics required by federal and state dangerous waste regulations are included in courses taught at the Hanford Facility. The courses cover a wide spectrum of target audiences. For example, some courses address the level appropriate for All Employees. At the other end of the spectrum, some of these courses concern responsibilities of General Managers who function as the emergency coordinator as defined in WAC 173-303-360.

Table 2. Applicability of WAC 173-303-330(1)(d) to
TSD Units

| | Less Than 90 DAY Accumulation Areas | TANK SYSTEMS | CONTAINMENT BUILDINGS | STORAGE TUNNELS |
|---|--|-----------------|--------------------------|--------------------|
| Procedures for using, inspecting, repairing, and replacing emergency and monitoring equipment | Y | N | Y | N |
| Key parameters for automatic waste feed cut-off systems | N | N | N | N |
| Communications or alarm systems | Y | N | Y | Y |
| Response to fires or explosions | Y | N | Y | Y |
| Response to groundwater contamination incidents | N | N | N | N |
| Shutdown of operations | N | N | Y | N |

3.2.3 Operator Certification Packages

To ensure personnel are properly trained in PUREX Facility Deactivation and Operation, certifications for specific work assignments have been created. Not every certification offered for PUREX Facility operators is based upon Dangerous and/or Mixed Waste Management. Only the certifications that are based on Dangerous and Mixed Waste Management are included in this training plan. Of the five certification packages developed, only one is applicable to this plan, and is Course 250020, PUREX Solid Waste Management. Areas such as systems surveillance, alarm emergency response, spill control, and equipment are addressed to meet the requirements of Section 3.2.2, Emergency Response Training.

3.3 Training Records

3.3.1 Location of Training Records

Training records, as described in WAC 173-303-330, consist of documentation that shows training has been completed. Hanford Facility training records include both electronic data storage and hard copies. The electronic data storage information is the training record initially presented to demonstrate that personnel have been trained. After a course is completed, the electronic data storage record is created on the Training Record Information (TRI) system.

The electronic data storage record will contain the course number, course title, date of attendance, and any refresher dates. Hard copies of training records that are sent to the training record organization for entry on the TRI System are initially maintained in Richland, Washington. Original hard copy training records are transferred quarterly to the Records Holding Facility in Richland, Washington. After approximately 1 year, the original hard copy training records are archived at the permanent record storage center in Renton, Washington. Electronic data storage and hard copy training records of former employees are kept for at least 3 years from the date the employee last worked at PUREX.

3.3.2 Access of Training Records

When a training record is requested during an inspection, an electronic data storage record will initially be provided. When the electronic data storage record does not satisfy the inspection concern, a hard copy training record will be provided. Training records of former employees may not be available through computers at the PUREX Facility and may

require a representative from the Training Records organization to access the TRI System for this information.

3.3.3 Determining Current Training Status

After an electronic data storage training record is obtained, it will be compared to information in this plan. This plan can be used to determine the RCRA training status of all personnel in relation to all worker categories identified in this plan. The electronic data storage training record coupled with this training plan will give any inspector the ability to quickly determine the training status of personnel in the field.

4.0 UPDATING THE TRAINING PLAN

A current list by name, job title, and job description for the PUREX Facility will be issued quarterly. The list will be maintained on the Hanford Facility to satisfy the requirements of WAC 173-303-330. When the Emergency Coordinators change (i.e., BED), Emergency Preparedness will also be contacted to ensure the list of Emergency Coordinators is properly maintained.

5.0 RCRA COURSE DESCRIPTIONS

The following courses are driven by the requirements of the WAC 173-303, Dangerous Waste Regulations. Appendix A includes personnel in the applicable worker categories, (3, 4, or 5) and the training courses applicable for their responsibilities. This attachment is updated quarterly in the unit specific file.

| COURSE NUMBERS | COURSE TITLES |
|----------------|--|
| 000001 | Hanford General Employee Training |
| 02006G | Waste Management Awareness |
| 02028B | Building Emergency Director Training |
| 03E024 | Unit/Building-specific contingency plan training - PUREX Facility |
| 035010 | Waste Designation |
| 035020 | Facility Waste Sampling and Analysis |
| 035120 | Waste Management Administrative - Initial |
| 035130 | Waste Management Administrative - Requalification |
| 037510 | Building Emergency Director Requalification |
| 250020 | PUREX Solid Waste Management |
| 250701 | PUREX Complex Orientation |

PUREX FACILITY
STAFFING/TRAINING PLAN

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| | |
|------------------------------|--|
| Title | 000001 Hanford General Employee Training |
| Description | Course covers DOE Orders and applicable policies pertaining to employer and employee rights and responsibilities, general radiation training, hazard communications, dangerous waste, fire prevention, personal protective equipment, safety requirements, certain unit/building orientation refresher training, emergency preparedness, accident reporting, and avenues for addressing safety concerns. |
| Mandating Document(s) | WAC 173-303-330 |
| Target Audience | All Hanford Facility personnel |
| Delivery | Computer-based training with interactive video |
| Evaluation | Computer generated questions |
| Length | Average = 2 to 6 hours |
| Frequency | Annual |

| | |
|------------------------------|---|
| Title | 020066 Waste Management Awareness |
| Description | Course introduces workers to federal laws governing chemical safety in the work place. The course provides the hazardous material/waste worker with the basic fundamentals for safe use and disposal of hazardous material. Course defines hazard communication and hazardous material, reviews labeling requirements, and introduces material safety data sheets and key terms used in chemical safety. The course also introduces methods for waste minimization. |
| Mandating Document(s) | WAC 173-303-200(2) |
| Target Audience | Hanford Facility personnel categorized as a General Worker, Advanced General Worker, General Manager, and General Shipper |
| Delivery | Classroom |
| Evaluation | Written examination - 80% passing grade |
| Length | 4 hours |
| Frequency | N/A - One Time Only |

| | |
|------------------------------|--|
| Title | 020288 Building Emergency Director Training |
| Description | Course provides an overview of the responsibilities of the building emergency director, identifies the building emergency organizations, actions required during an event, implementing the contingency plan, and discusses drill and exercise requirements. |
| Mandating Document(s) | WAC 173-303-340, -350, and -360 |
| Target Audience | Building Emergency Directors and their alternates who can function as the Emergency Coordinator |
| Delivery | Classroom |
| Evaluation | Not Applicable |
| Length | 2 hours |
| Frequency | Initial (Retrained annually by 037510 Building Emergency Director/Warden Requalification) |

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| | |
|------------------------------|---|
| <u>Title</u> | 03E024 Unit/building-Specific Contingency Plan Training- PUREX Facility |
| <u>Description</u> | Course consists of a review of specific hazards associated with the TSD units as covered by the contingency plan (WHC-IP-0263-202A). The training is completed by the supervisor, manager, or a designated individual using a checklist. The unit/building-specific information is reviewed concerning hazards in the work area and emergency response requirements, including where applicable, waste feed cut-off, communication and alarm systems, and response to fires. The checklist acts as a guide to ensure consistent coverage of necessary topics. |
| <u>Mandating Document(s)</u> | WAC 173-303-330(1)(d), -340, and -350 |
| <u>Target Audience</u> | All Hanford Facility personnel categorized as Advanced General Workers, General Managers, and General Shippers assigned to TSD units. All General Workers may take this course, or equivalent training may be given during the pre-job safety meeting the General Worker may be escorted by qualified TSD units personnel. |
| <u>Delivery</u> | One-on-one or as a group with supervisor, manager or designated individual |
| <u>Evaluation</u> | Training checklist documentation |
| <u>Length</u> | 1 hour |
| <u>Frequency</u> | Annual |

| | |
|------------------------------|--|
| <u>Title</u> | 035010 Waste Designation |
| <u>Description</u> | Course teaches dangerous waste designation according to WAC 173-303. Class content includes section-by-section lecture on the regulations, with examples following each section. Students complete examples using a waste designation flow chart. Examples addressed include: federal listed waste, discarded chemical products, dangerous waste source, Washington State criteria: toxicity, persistence, carcinogenic, and federal characteristics: ignitability, corrosivity, reactivity, and toxicity. |
| <u>Mandating Document(s)</u> | WAC 173-303-070, and -080 through -100 |
| <u>Target Audience</u> | General Shippers |
| <u>Delivery</u> | Classroom |
| <u>Evaluation</u> | Written Exam - 80% passing grade |
| <u>Length</u> | 12 Hours |
| <u>Frequency</u> | One Time Only |

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| | |
|------------------------------|--|
| Title | 035020 Facility Waste Sampling and Analysis |
| Description | Course presents waste sampling methodologies according to EPA Protocols SW-846, Test Methods for Evaluating Solid Waste Physical/Chemical Methods. This course also covers documentation requirements in a sampling plan, field and laboratory quality control/assurance, and use of actual sampling equipment. One-time training is required because the General Shipper, in most cases, will utilize resources on the Hanford Facility to acquire samples. This training provides an overview of information to ensure that sampling efforts are properly set up. |
| Mandating Document(s) | WAC 173-303-110 and -070 |
| Target Audience | General Shippers |
| Delivery | Classroom presentation, exercises, demonstration and discussion |
| Evaluation | Written Examination |
| Length | 12 hours |
| Frequency | One time only |

| | |
|------------------------------|---|
| Title | 035120 Waste Management Administration - Initial |
| Description | Course is designed for personnel preparing to become authorized shippers of dangerous and/or mixed waste. This course covers regulatory and company policies, forms, reports, forecasts, and plans. Topics also covered include: waste characterization, waste storage disposal request, low level waste storage/disposal record, transuranic waste storage/disposal record, and radioactive mixed waste attachment sheet. In addition, students will learn how these forms are used to complete shipping papers. |
| Mandating Document(s) | WAC 173-303-330 |
| Target Audience | General Shippers |
| Delivery | Classroom |
| Evaluation | Written Examination - 80% passing grade |
| Length | 8 Hours |
| Frequency | Initial (Retrained annually by 035130 Waste Management Administration - Refresher) |

| | |
|------------------------|--|
| Title | 035130 Waste Management Administration - Refresher |
| Description | Refreshes course 035120 |
| Target Audience | General Shippers |
| Delivery | Classroom |
| Evaluation | Written Examination - 80% passing grade |
| Length | 4 Hours |
| Frequency | Annual |

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| | |
|-----------------|--|
| Title | 037510 Building Emergency Director Requalification |
| Description | Refresher for Building Emergency Director Training |
| Target Audience | Building Emergency Directors and alternates |
| Delivery | Classroom |
| Evaluation | Not Applicable |
| Length | 2 hours |
| Frequency | Annual |

| | |
|-----------------------|--|
| Title | 250020 PUREX Facility Solid Waste Management |
| Description | Course elements include Operators specific responsibilities with regards to the safe and compliant packaging, storage, and shipment of Dangerous and/or Mixed Waste at the PUREX Facility. Information includes all applicable information covering administration and use of Satellite Accumulation Areas and <90 Day Accumulation Areas. Course also includes elements of compliance with all Federal, State, Local, and DOE and WHC regulations governing the packaging and storage of Dangerous and/or Mixed Wastes. |
| Mandating Document(s) | WAC 173-303-330 |
| Target Audience | Advanced General Workers (Operators and immediate Managers) |
| Delivery | Classroom |
| Evaluation | Written examination - Operators-70% passing grade, OJT, Job Performance Measures/Managers Exam only, 80% passing grade. |
| Length | 3 days |
| Frequency | Every other year |

| | |
|-----------------------|--|
| Title | 250701 PUREX Complex Orientation |
| Description | Course describes the general layout of the PUREX Facility, as well as, some of the general hazards employees may encounter at various locations within the facility. |
| Mandating Document(s) | WAC 173-303-330 |
| Target Audience | All PUREX Facility Advanced Waste Workers, General Shippers and General Managers. |
| Delivery | Computer Based Training |
| Length | 1 hour |
| Frequency | Every other year |

PUREX Facility Gen Mgrs

| Example | WST | BLDG | BED | PUREX | PUREX |
|------------|------------------|------------|------------------|------------------|------------------|
| | HGET | MGMT | | BLDG | FCLTY |
| Name | 000001-M | 02006G-M | TRNG INI | REQUAL | ORIENT |
| | <u>12 Months</u> | <u>N/A</u> | <u>12 Months</u> | <u>12 Months</u> | <u>24 Months</u> |
| Employee 1 | 06/21/97 | Complete | Complete | 02/24/98 | 01/29/98 |
| Employee 2 | 04/26/97 | Complete | Complete | 02/24/98 | 01/31/98 |
| Employee 3 | 10/30/97 | Complete | N/A | N/A | 01/30/98 |
| | | | | | 11/03/97 |

PUREX Facility Ad Wst WK

| Example | WST | MGMT | PUREX | BLDG | FCLTY | WST | PUREX | PUREX |
|------------|------------------|------------|------------------|------------------|------------------|------------------|------------------|------------------|
| | HGET | AWR | EMER | PLAN | MGMT | CMPLX | ORIENT | CMPLX |
| Name | 000001-M | 02006G-M | 03E024-M | 250020-P | 250701-R | <u>12 Months</u> | <u>24 Months</u> | <u>24 Months</u> |
| | <u>12 Months</u> | <u>N/A</u> | <u>12 Months</u> | <u>24 Months</u> | <u>24 Months</u> | | | |
| Employee 4 | 05/31/97 | Complete | 01/16/98 | 11/30/98 | 09/24/98 | | | |
| Employee 5 | 09/24/97 | Complete | 04/19/97 | 11/30/98 | 09/13/97 | | | |
| Employee 6 | 07/29/97 | Complete | 12/12/97 | 11/30/98 | 08/01/97 | | | |

PUREX Facility Gen Ships

| Example | WST | WASTE | FCLTY | WASTE | PUREX | PUREX |
|------------|------------------|------------|------------|------------------|------------------|------------------|
| | HGET | DESIGNAT | WST | | MGMT | CMPLX |
| Name | 000001-M | ION | SAMPLE & | MGMT | EMER | ORIENT |
| | <u>12 Months</u> | <u>N/A</u> | <u>N/A</u> | <u>12 Months</u> | <u>12 Months</u> | <u>24 Months</u> |
| Employee 7 | 05/31/97 | Complete | Complete | Complete | 09/30/97 | 01/22/98 |
| Employee 8 | 07/22/97 | Complete | Complete | Complete | 04/07/98 | 01/22/98 |
| | | | | | | 08/28/97 |

Keys:

<< >> An expired certification date.
 Blank The course has never been obtained.
 * * The employee has been scheduled to attend this course.

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