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ADDENDUM H
WASTE ENCAPSULATION AND STORAGE FACILITY HOT CELL A THROUGH F
DANGEROUS WASTE MANAGEMENT UNIT CLOSURE PLAN

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**ADDENDUM H
WASTE ENCAPSULATION AND STORAGE FACILITY HOT CELL A THROUGH F
DANGEROUS WASTE MANAGEMENT UNIT CLOSURE PLAN**

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1 **TERMS**

AMU	aqueous makeup
Cs-137	cesium-137
DOE	U.S. Department of Energy
DOE-RL	DOE Richland Operation Office
DQA	data quality assessment
DWMU	dangerous waste management unit
Ecology	Washington State Department of Ecology
EPA	U.S. Environmental Protection Agency
ERDF	Environmental Restoration Disposal Facility
FWS	Field Work Supervisor
HEIS	Hanford Environmental Information System
HEPA	high-efficiency particulate air
HHE	human health and the environment
IQRPE	Independent Qualified Registered Professional Engineer
LDR	land disposal restriction
LLW	low-level waste
MTCA	“Model Toxics Control Act—Cleanup” (<u>WAC 173-340</u>)
N/A	not applicable
PPE	personal protective equipment
QA	quality assurance
QC	quality control
RCRA	<i>Resource Conservation and Recovery Act of 1976</i>
SAP	sampling and analysis plan
Sr-90	strontium-90
TSD	treatment, storage, and/or disposal
VSP	Visual Sample Plan
WESF	Waste Encapsulation and Storage Facility

2

1 H1 INTRODUCTION

2 This addendum details closure activities for the Waste Encapsulation and Storage Facility (WESF)
3 Closure Unit Group 6 Hot Cell A through Hot Cell F dangerous waste management unit (DWMU).

4 H2 FACILITY CONTACT INFORMATION

5 WESF Operator and Property Owner:

6 Stacy L. Charboneau, Manager
7 U.S. Department of Energy, Richland Operations Office
8 P.O. Box 550
9 Richland, WA 99352
10 (509) 376-7395

11 WESF Co-Operator:

12 John Ciucci, President and Chief Executive Officer
13 CH2M HILL Plateau Remediation Company
14 P.O. Box 1600
15 Richland, WA 99352
16 (509) 376-0556

17 H3 FACILITY DESCRIPTION

18 WESF was constructed on the west end of B Plant between 1971 and 1973 to encapsulate and store
19 radioactive cesium-137 (Cs-137) and strontium-90 (Sr-90) that had been separated from plutonium
20 production waste stored in underground storage tanks on the Hanford Facility. Separation of cesium and
21 strontium from tank waste occurred at B Plant.

22 WESF is a two-story, 1,858 m² (20,000 ft²) building approximately 48 m long, 30 m wide, and 12 m high
23 (160 ft long, 98 ft wide, and 40 ft high), constructed of steel reinforced concrete that is partitioned into
24 seven hot cells, the hot cell service area, operating areas, building service areas, and the pool cell area.

25 The hot cells, hot cell service area, operating areas, and building service areas supported encapsulation
26 operations. Encapsulation included conversion of Cs-137 to cesium chloride and Sr-90 to strontium
27 fluoride, placement of cesium chloride and strontium fluoride into double walled stainless steel capsules,
28 and seal welding of the capsules. Leak tests were performed to confirm adequacy of the welds.

29 WESF stores 1,936 capsules: 1,335 of cesium and 601 of strontium. The cesium capsules are double wall
30 stainless steel containers with a length of approximately 53 cm (21 in.) and a diameter of approximately
31 8 cm (3 in.). Strontium capsules have the same general dimensions but consist of a Hastelloy® inner
32 capsule and a stainless steel outer capsule. Of the cesium capsules, 23 are referred to as Type-W
33 overpacks. Type-W overpacks were fabricated and overpacked at the 324 Building from 1997 to 1999.
34 Of these overpacks, 16 contain degraded cesium capsules. The other seven contain containers of cesium
35 chloride that were packaged during cleanout of the 324 Building. Type-W overpacks are made of
36 stainless steel and have a length of 55.4 cm (21.8 in.) and a diameter of 8.26 cm (3.25 in.). If additional
37 capsules need to be overpacked, a welding process would be developed and implemented in Hot Cell G.

38 The WESF pool cell area provides the necessary storage capability for cesium and strontium capsules.
39 Underwater storage of the capsules provides both radioactive shielding and heat removal.

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1 **H3.1 Facility History, Function, Location, and Layout**

2 Construction of WESF started in 1971 and was complete by 1973. Encapsulation operations at WESF
3 began shortly after completion of construction and were complete by January 1985. By March 1985,
4 WESF completed transition into a standby/surveillance mode.

5 WESF has stored encapsulated Cs-137 and Sr-90 since encapsulation operations began in 1974.
6 The capsules were initially managed as a commercial product and were used in a number of applications
7 throughout the United States. The primary commercial application was sterilization of
8 medical equipment.

9 In August 1987, the *Resource Conservation and Recovery Act of 1976* (RCRA) became effective on the
10 Hanford Facility for active management of mixed radioactive and hazardous waste.

11 On July 14, 1997, the U.S. Department of Energy (DOE) decided to end commercial application of the
12 capsules, and they were reclassified as a mixed waste.

13 WESF consists of seven hot cells, the hot cell service area, operating areas, building service areas, and the
14 pool cell area. WESF has three DWMUs: two operating and one initiating closure (see Section H3.3 for
15 details of the three DWMUs).

16 The seven hot cells are identified as Hot Cells A through G. The hot cells provided necessary radioactive
17 shielding and equipment to allow workers to perform encapsulation tasks. Due to the highly radioactive
18 nature of Cs-137 and Sr-90, all handling of Cs-137, Sr-90, and capsules must be performed remotely.

- 19 • Hot Cell A provided the capability to package waste generated inside the hot cells into drums and
20 remove the packaged waste from the hot cells for disposal.
- 21 • Strontium processing occurred in Hot Cell B and Hot Cell C. Processing included the receipt of
22 strontium solution from B Plant, conversion of the solution to strontium fluoride, drying of
23 strontium fluoride and placement into an inner capsule, and seal welding and leak testing of the
24 inner capsule.
- 25 • Cesium processing occurred in Hot Cell D and Hot Cell E. Processing included receipt of cesium
26 solution from B Plant, conversion of the solution to cesium chloride, removal of water from the
27 cesium chloride, melting of the cesium chloride and placement into an inner capsule, and seal
28 welding and leak testing of the inner capsule.
- 29 • Hot Cell F provided the capability to decontaminate and store the inner capsules.
- 30 • Hot Cell G provided the capability to weld, inspect, and decontaminate the outer capsules.

31 The service gallery is located on the south side of the hot cells and contained support equipment for the
32 hot cell processes, including utility and auxiliary process piping. The operating gallery is located on the
33 north side of the hot cells. Remote work in the hot cells was performed from the operating gallery using
34 manipulators. Figures H1 through H4 show the WESF layout.

35 When encapsulation operations were completed in 1985, WESF was transitioned into a standby and
36 surveillance mode. In this mode of operation, only equipment and instruments required for continued
37 safe storage of the capsules remained operational. This included the operation and maintenance of the
38 pool cells and support systems for Hot Cells F and G. The confinement ventilation system remained
39 operable to provide containment of legacy radioactive contamination and to support surveillance
40 operations.

41 In 2001, water sources to Hot Cells A through F were isolated, and manipulators were removed from Hot
42 Cell A through Hot Cell E. Manipulators in Hot Cell F and Hot Cell G remain active.

43 In 2014, the WESF Stabilization and Ventilation Project was initiated to stabilize legacy contamination in
44 the hot cells and K3 exhaust ventilation duct and resolve inadequacies in the K3 exhaust system by

1 replacing it with a new system. This project will be used to meet the DOE-Richland Operations Office
2 (RL) commitment to the DOE Office of Environmental Management's Safety, Security, and Quality
3 Programs (EM-40) to complete WESF ventilation upgrades by the end of fiscal year (FY) 2016
4 (13-NSD-0042, *Revised Schedule for Completion of Waste Encapsulation and Storage Facility (WESF)*
5 *2004-2 Ventilation Upgrades*) and is the first step towards placing the capsules into a dry
6 storage configuration.

7 **H3.2 Products and Production Processes**

8 WESF does not generate products or have any production processes. WESF currently acts as a storage
9 facility for stainless steel capsules containing radioactive cesium chloride and strontium fluoride salts.
10 These capsules are stored in the Pool Cells DWMU and can be placed into the Hot Cell G DWMU for
11 inspection or if a capsule is suspected of leaking. The Hot Cell A through Hot Cell F DWMU is not
12 needed for capsule or mixed waste storage (see Section H3.3 for details of the three DWMUs).

13 **H3.3 Dangerous Waste Management and Units**

14 The three DWMUs at WESF are shown in Figure H1. One DWMU consists of the pool cells, and a
15 second consists of Hot Cell G. The Pool Cells and the Hot Cell G DWMUs are operational and necessary
16 for storage of the capsules. The third DWMU consists of Hot Cells A through F. This DWMU is not
17 necessary for storage of capsules at WESF, and it will be undergoing closure.

18 This plan addresses closure of the Hot Cell A through Hot Cell F DWMU. Closure of the other two
19 operating DWMUs will be addressed in closure plans for each operating DWMU.

20 The Hot Cell A air lock, hot pipe trench, and K3 duct trench are included in this closure plan but are not
21 part of the Hot Cell A through Hot Cell F DWMU. Even though these areas are not part of the DWMU,
22 they will be grouted along with the hot cells to preclude the spread of contamination from the hot cells.

23 **H3.4 Unit Description**

24 This section provides a detailed description of the WESF Hot Cell A through Hot Cell F DWMU. This is
25 one of three DWMUs at WESF and the DWMU undergoing the closure actions described in this plan.

26 As discussed in Section H3.1, Hot Cells A through E are deactivated, and no activities are performed in
27 these hot cells. Hot Cells F and G have remained operational to provide the capability to inspect and store
28 the capsules and retain the capability for future removal of the capsules from WESF. The following
29 activities are performed in Hot Cells F and G:

- 30 • Capsules may be moved into Hot Cell G to be inspected.
- 31 • Capsules suspected of leaking would be moved into Hot Cell G for initial inspection. Leaking
32 capsules would be moved to Hot Cell F for storage out of the pool cell. The capsules could also
33 be stored in Hot Cell G; however, personnel access to the hot cell would be prevented.
- 34 • In the future, capsules will be loaded into canisters/casks in Hot Cell G to allow removal of the
35 capsules from WESF.

36 Following completion of the initial closure activities, as discussed in Section H5.5, Hot Cell F will be no
37 longer be available for use to store capsules. Hot Cell G will remain operational as an operating DWMU.
38 Shielded storage will be provided in Hot Cell G and could be used to store several leaking capsules. This
39 will allow personnel access to the hot cell while capsules are being stored.

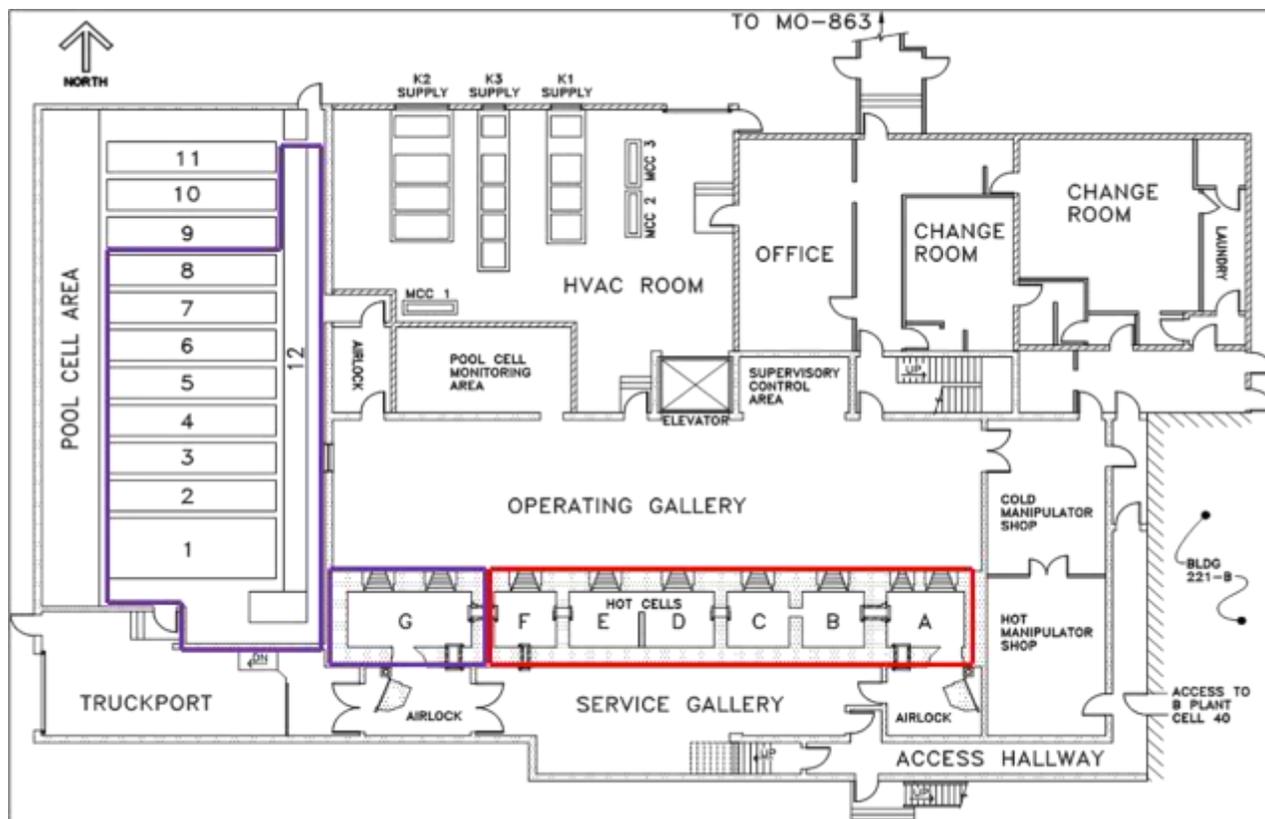


Figure H1. Waste Encapsulation and Storage Facility Pool and Process Cells

A plan view of the hot cells is shown in Figure H1. Removable high-density concrete cover blocks, located at the top of the hot cells (on the floor of the canyon), provide access to the hot cells, pool cell area, and truck port from the canyon. The north and south walls of all the hot cells and both the east and west walls of Hot Cell A and Hot Cell G are 89 cm (35 in.) thick, high-density $3,760 \text{ kg/m}^3$ (235 lb/ft^3), reinforced concrete. Hot Cell A has an 89 cm (35 in.) high-density concrete shielding door for personnel entry from the service gallery.

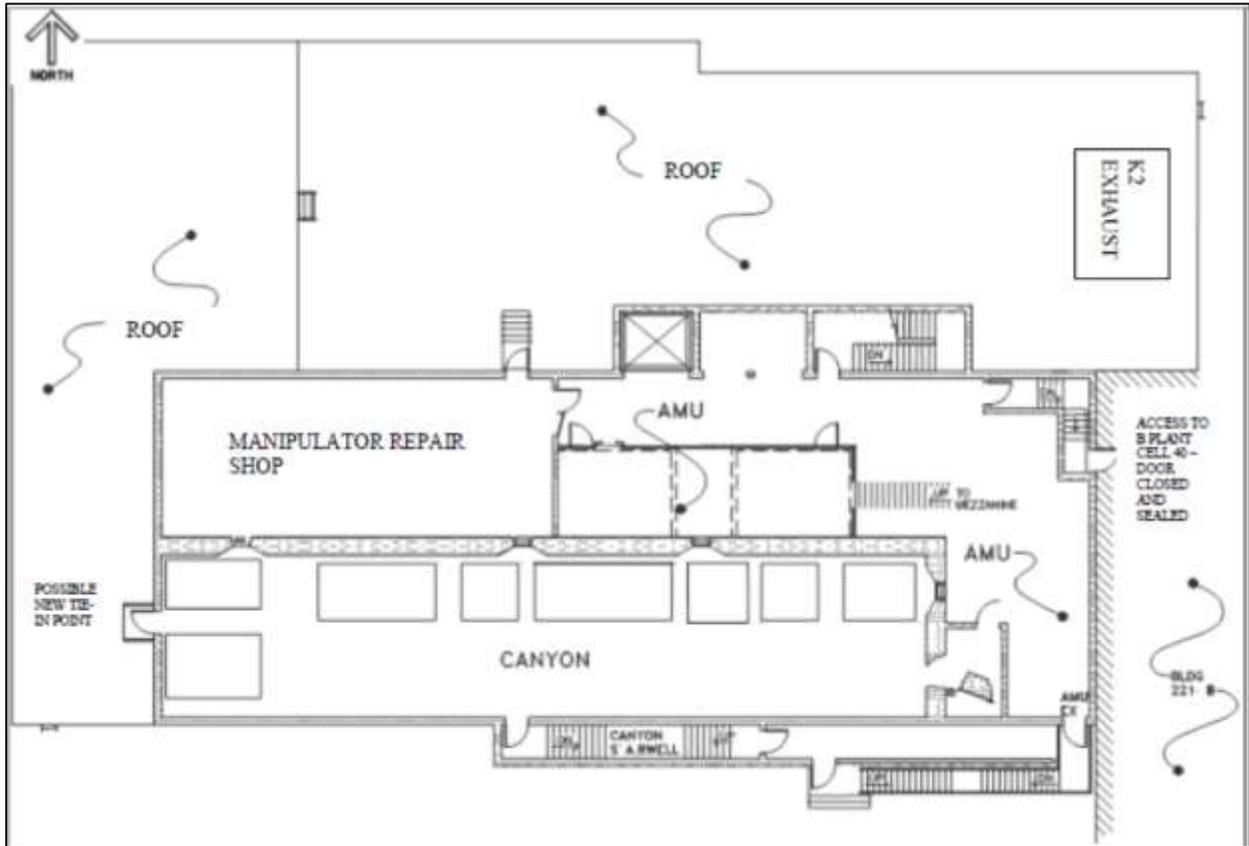
Process and/or service piping is embedded in the concrete walls of each hot cell. The pipes connect the hot cells to each other, as well as to the hot pipe trench, transmitter rooms, aqueous makeup (AMU) area, service gallery, and operating gallery. Process piping, including in-cell jumpers, was used to convey cesium and strontium solutions between tanks and other processing equipment. Service piping includes utility services such as air, water, and electricity that supported process equipment operation; service piping did not contain cesium or strontium.

All processing activities were completed before 1985, and the hot cells were placed into a standby/surveillance mode. Standby/surveillance actions for the hot cells included process equipment cleanout using a series of demineralized water flushes on all in-cell jumpers and tanks. Chemical flushes were then used to remove residual solids. After the chemical flushes, a final demineralized water flush was used. All jumpers were removed, with the tank nozzles remaining open, and the associated nozzle on the cell wall was capped.

Process feed lines from B Plant to WESF were flushed, as well as the drain lines from WESF to B Plant.

Hot cell piping and tanks were flushed using normal nuclear industry practices to remove any residual feed solutions, processing chemicals, and tank heels. Flushing was completed in 1985 before RCRA enactment. No processing has occurred in the hot cells since they were placed in standby/surveillance

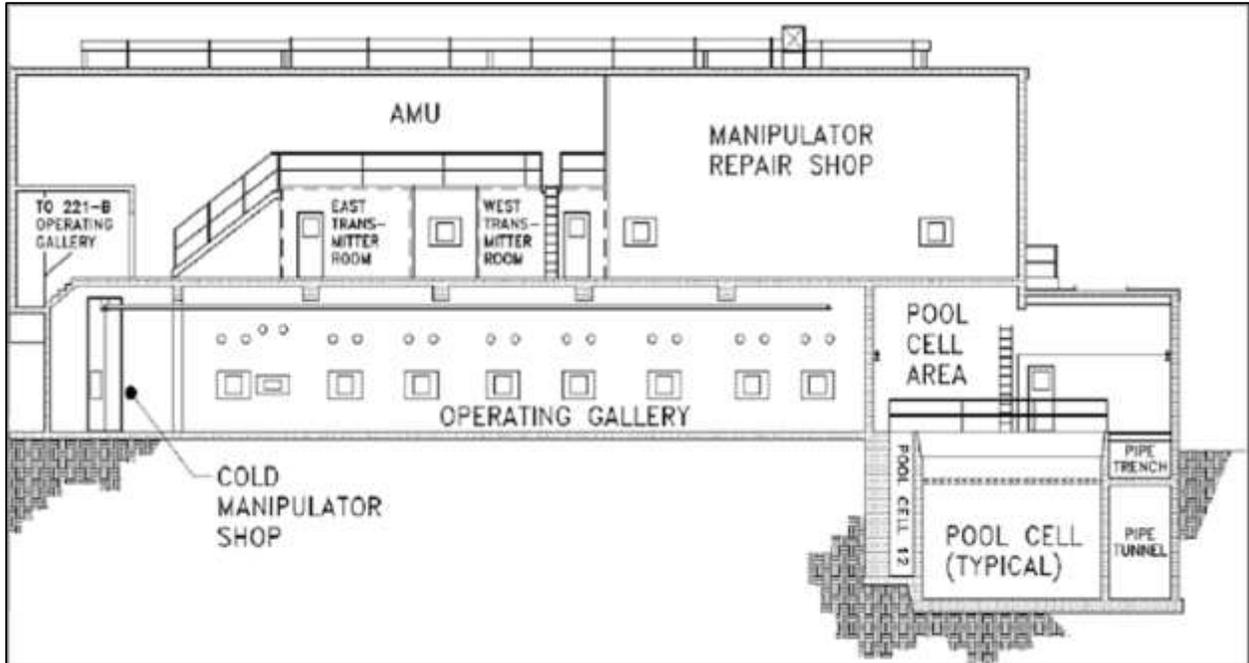
1 mode. In 2000, high-efficiency particulate air (HEPA) filters within the hot cells were replaced, and the
 2 used filters remain in the hot cells. Items remaining in the hot cells are hazardous debris.



3
 4 **Figure H2. WESF Second Floor Plan**

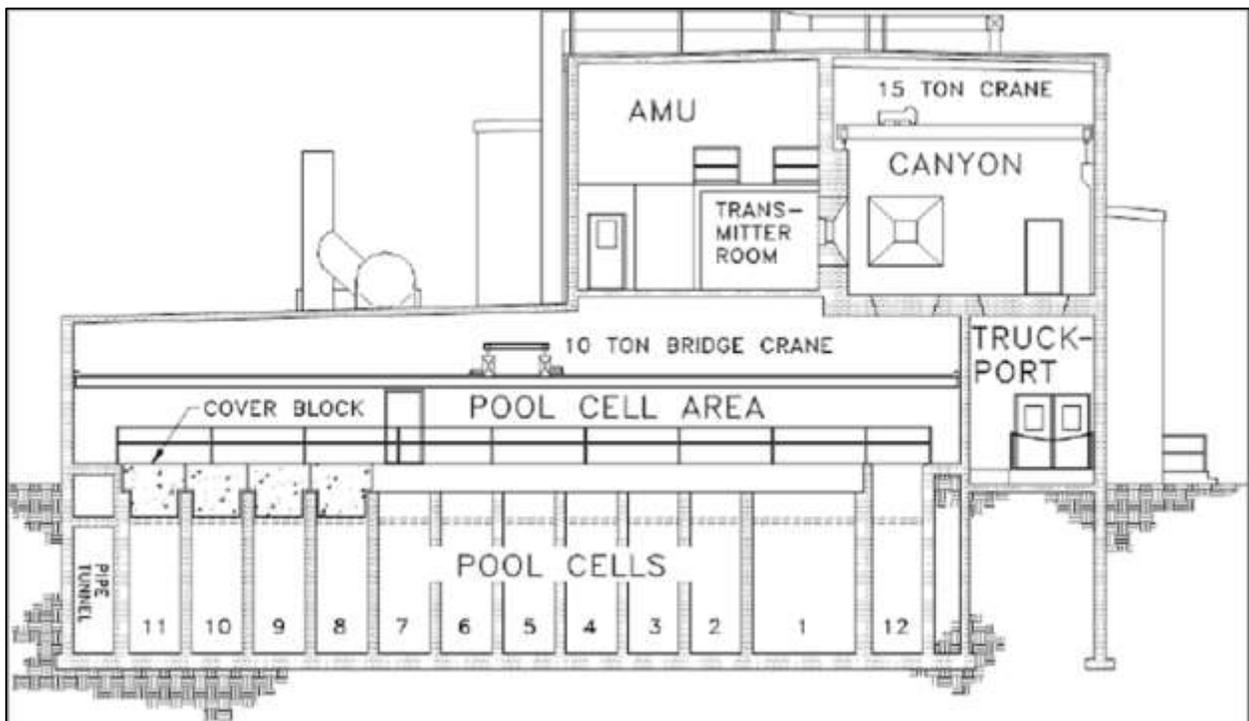
5 The following subsections provide detailed information on:

- 6
- 7 • Hot Cells A through F
 - 8 • Hot cell viewing windows
 - 9 • Hot cell manipulators
 - 10 • Hot pipe trench and K3 duct trench
 - 11 • Tank-100
 - WESF ventilation system



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Figure H3. WESF East/West Sectional View



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Figure H4. WESF North/South Sectional View

1 **H3.4.1 Hot Cell A**

2 Hot Cell A contains equipment that was required for handling high dose radioactive solid waste from the
3 other hot cells and placing it in 208 L (55 gal) drums. The inside dimensions of Hot Cell A are 3 m
4 (10 ft) long by 2.4 m (8 ft) wide by 4.1 m (13.5 ft) high. The floor and walls are lined with 14-gauge
5 304L stainless steel. Figure H5 is an illustration of Hot Cell A. It is an elevation looking south. Hot Cell
6 B is located to the west.

7 The wall between Hot Cell A and the adjacent Hot Cell B contains a 1.2 m (4 ft) by 2.4 m (8 ft) by 1.2 m
8 (4 ft) stainless steel hood for receiving contaminated solid waste. A pass-through with doors is located
9 between the A Cell Hood and Hot Cell B. Pass-throughs were installed to allow solid waste and small
10 equipment to pass between hot cells or other areas. A second pass-through with doors is located between
11 the A Cell Hood and the service gallery (on the south wall of the A Cell Hood). A sump is located along
12 the south wall of the hot cell. It is a small approximately 30 cm by 40 cm by 20 cm deep (12 in. by 16 in.
13 by 8 in. deep) open-topped recess in the floor. A steam eductor (not located in the hot cell) was used to
14 remove liquids that collected in the sump.

15 Hot Cell A does not contain any process piping. Radioactive contamination in Hot Cell A and the A Cell
16 Hood is the result of the waste packaging process and consists of surface contamination. Contamination
17 remaining within Hot Cell A and the Hot Cell A Hood is less than the contamination within the other hot
18 cells because during WESF operations, Hot Cell A and the Hot Cell A Hood were periodically
19 decontaminated to a level that would allow manned entry.

20 This hot cell is equipped with a shielded personnel entry door accessible from the Hot Cell A air lock
21 located at the east end of the service gallery. Hot Cell A contains the following equipment:

- 22 • Handling equipment for 208 L (55 gal) drums (drum dolly lift runs north and south underneath
23 the A Cell Hood to allow the drum to be positioned for loading and removal from the hot cell).
- 24 • Hot Cell A Hood.
- 25 • Service piping necessary to support encapsulation operations.
- 26 • Two HEPA filters installed in the hot cell exhaust ventilation ducting.
- 27 • Two used HEPA filters that were replaced in 2000 and remain on the hot cell floor.

28 Table H1 provides additional details for each listed item.

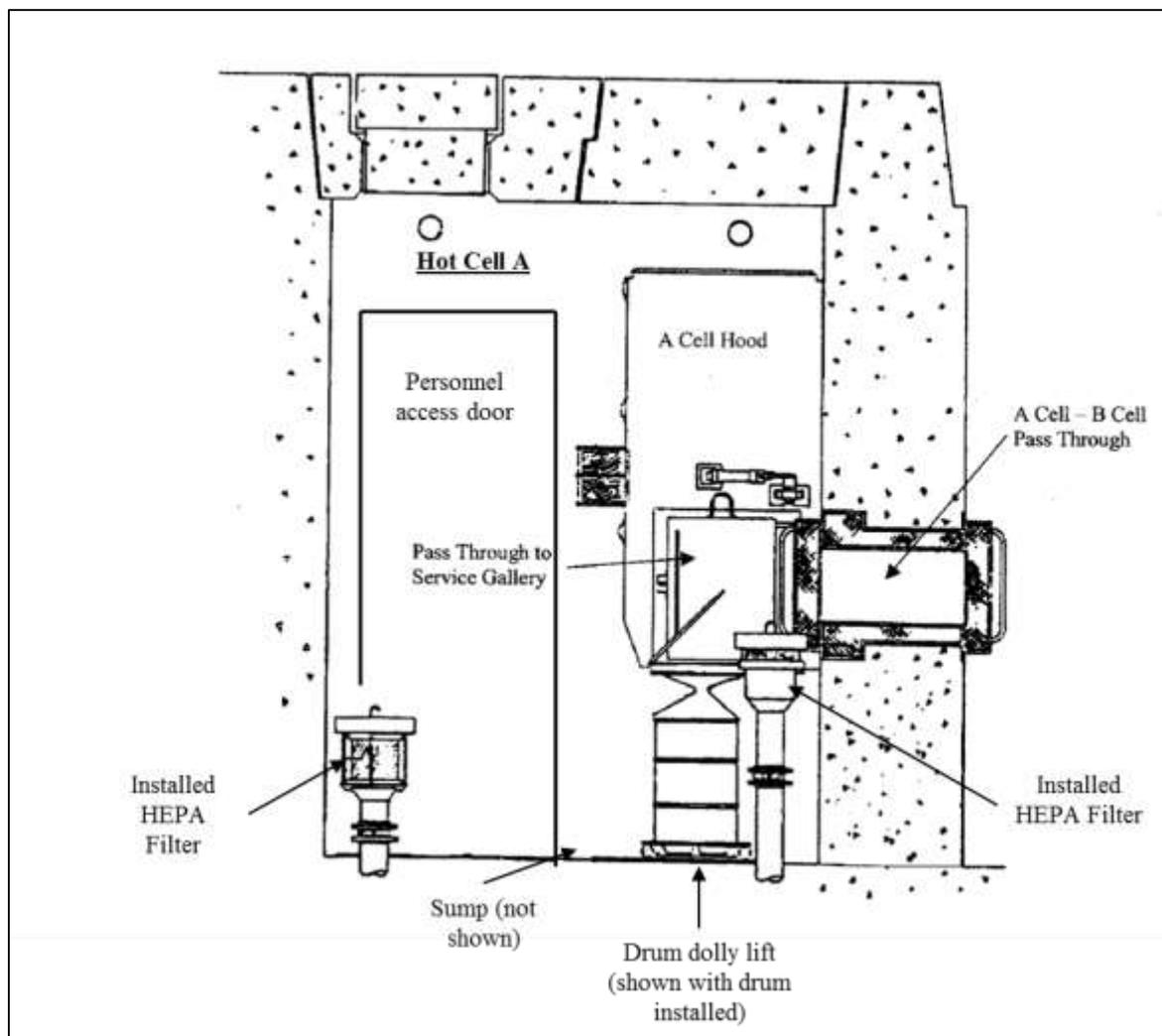


Figure H5. Hot Cell A

H3.4.2 Hot Cell B

Hot Cell B contains equipment that was used for strontium wet chemistry processing. This processing included the receipt of strontium nitrate from B Plant, conversion to strontium fluoride which was a precipitate, filtration to remove the precipitate, removal of the filtrate from the filter, placement of the filtrate into trays, and heating to remove water from the filtrate.

The inside dimensions of Hot Cell B are 2.4 m (8 ft) long by 2.4 m (8 ft) wide by 3.9 m (13 ft) high. The rear half of the Hot Cell B floor is elevated 56 cm (22 in.) and is 1.2 m (4 ft) wide. The wall between Hot Cells A and B is approximately 89 cm (35 in.) thick and is constructed from high-density reinforced structural concrete 3,760 kg/m³ (235 lb/ft³). The wall between Hot Cell B and Hot Cell C is approximately 51 cm (20 in.) thick and is constructed from reinforced structural concrete 2,400 kg/m³ (150 lb/ft³). The floor and lower portion of the walls are lined with 14-gauge 304L stainless steel. Figure H6 is an illustration of Hot Cell B. It is an isometric looking to the southwest. Hot Cell A is to the east, and Hot Cell C is to the west.

A pass-through with doors is located between the A Cell Hood and Hot Cell B (Figure H5).

A pass-through without doors is located between Hot Cells B and C that was used to pass small equipment and solid waste between the hot cells. A sump is located on the west wall of the hot cell next

1 to the elevated portion of the hot cell. It is a small 30 cm by 40 cm by 20 cm deep (12 in. by 16 in. by 8
2 in. deep) open-topped recess in the floor. A steam eductor (not located in the hot cell) was used to
3 remove liquids that collected in the sump.

4 Hot Cell B contains the following equipment:

- 5 • Feed metering tank (TK-B-1) located on the south wall.
- 6 • Supernate holding tank (TK-B-2) located in the elevated portion of the hot cell.
- 7 • Waste holding tank (TK-B-4) located in the wall between Hot Cell B and Hot Cell C.
- 8 • Precipitator tank (TK-B-5) located in the elevated portion of the hot cell.
- 9 • Strontium filters (F-B6-1 to F-B6-5) located on the floor on the east side of the hot cell.
- 10 • Strontium furnace (E-B-8) located in the wall between Hot Cell B and Hot Cell C.
- 11 • Process and service piping necessary to support encapsulation operations.
- 12 • Two HEPA filters installed in the hot cell exhaust ventilation ducting as well, as two used HEPA
13 filters that were replaced in 2000 and allowed to remain on the hot cell floor.
- 14 • Four trays containing floor sweepings located inside the strontium furnace (E-B-8).

15 Table H1 provides additional details for each listed item.

16 When the WESF strontium encapsulation mission was completed in 1985, the following tasks were
17 performed to clean out and empty the tanks in Hot Cell B (SD-WM-ER-022, *WESF Strontium Line*
18 *Standby/Surveillance*):

- 19 • All process feed lines and drain lines from B Plant were flushed with demineralized water.
- 20 • All in-cell process pipes and tanks (including TK-B-1, TK-B-2, TK-B-4, and TK-B-5) were
21 flushed with demineralized water.
- 22 • Sodium bicarbonate and caustic were used to flush TK-B-2, TK-B-4, and TK-B-5.
- 23 • Nitric acid was then added to TK-B-2, TK-B-4, and TK-B-5, and the resulting solution
24 was reprocessed.
- 25 • All in-cell process pipes and tanks (including TK-B-1, TK-B-2, TK-B-4, and TK-B-5) were again
26 flushed with demineralized water.
- 27 • Interiors of electrical conduits were wiped with a damp sponge.
- 28 • All in-cell jumpers on the tanks were removed and remained open to allow venting.

29 As a part of hot cell cleanup activities, loose material remaining on the Hot Cell B and Hot Cell C floors
30 was swept up and placed into trays that were then stored inside the strontium furnace. The trays contain
31 approximately 0.6 kg (1.3 lb) of material. This material in the trays includes strontium fluoride and
32 processing debris, including metal shavings, failed manipulator components, as well as any other debris
33 that was on the floor of the hot cell. Each tray is 26 cm (10.25 in.) by 8 cm (3.125 in.).

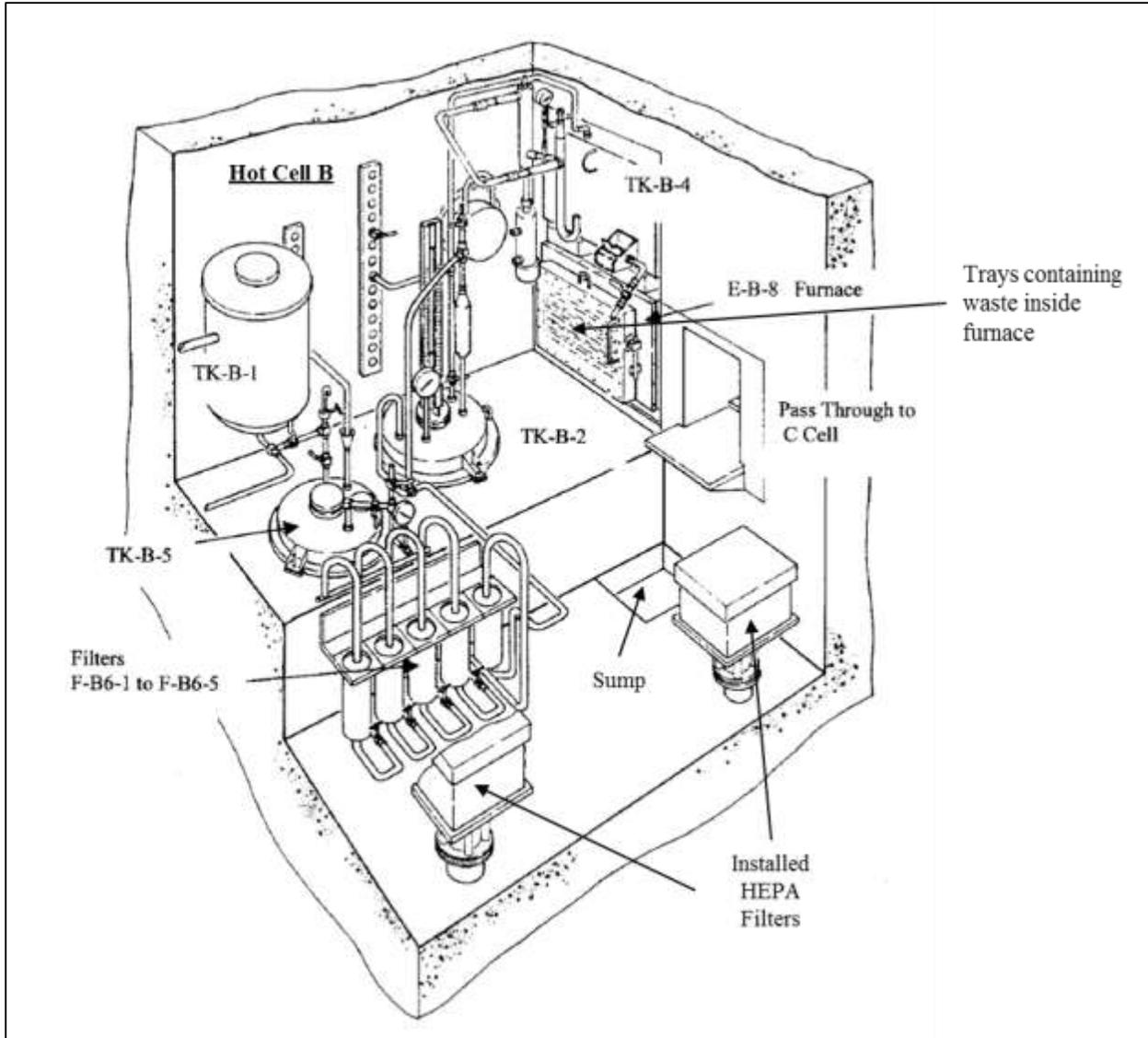


Figure H6. Hot Cell B

H3.4.3 Hot Cell C

Hot Cell C contains equipment that was used for the strontium fluoride encapsulation process. Processing consisted of removing the trays from the furnace, removing strontium fluoride from the trays, placing strontium fluoride in the inner capsule, compacting the material, welding the capsule end cap, and leak testing the inner capsule.

The inside dimensions of Hot Cell C are 2.4 m (8 ft) long by 2.4 m (8 ft) wide by 3.9 m (12.8 ft) high. The rear half of the Hot Cell C floor is elevated 22 in. and is 1.2 m (4 ft) wide. The walls between Hot Cells B and C and between Hot Cells C and D are approximately 51 cm (20 in.) thick and are constructed from reinforced structural concrete $2,400 \text{ kg/m}^3$ (150 lb/ft³). The floor and lower portion of the walls are lined with 14-gauge 304L stainless steel. Figure H7 is an illustration of Hot Cell C. It is an isometric looking to the southeast. Hot Cell B is to the east, and Hot Cell D is to the west.

The rear half of the hot cell floor is elevated 56 cm (22 in.) to form a bench that contains two shielded storage locations and the compactor foundation. The wall between Hot Cells C and B contains the strontium waste tank (TK-B-4) and strontium furnace (E-B-8).

1 There are two pass-throughs: one is an open pass-through to Hot Cell B, and the second is a pass-through
2 with doors to Hot Cell D. A sump is located on the east wall of the hot cell next to the elevated portion of
3 the hot cell. It is a small 30 cm by 40 cm by 20 cm deep (12 in. by 16 in. by 8 in. deep) open-topped
4 recess in the floor. A steam eductor (not located in the hot cell) was used to remove liquids that collected
5 in the sump.

6 Hot Cell C contains the following equipment:

- 7 • Shielded storage locations (TK-C-5A and TK-C-5B).
- 8 • Strontium compactor (C-C-4).
- 9 • Process and service piping necessary to support encapsulation operations.
- 10 • Two HEPA filters installed in the hot cell exhaust ventilation ducting, as well as two used HEPA
11 filters that were replaced in 2000 and allowed to remain on the hot cell floor.
- 12 • Two 61 cm (24 in.) long threaded capped pipes, containing 1.2 kg (2.6 lb) of floor sweepings, that
13 are located in the southwest corner of the cell on wall brackets above the bench floor.

14 Table H1 provides additional details for each listed item.

15 When the WESF strontium encapsulation mission was completed in 1985, the following tasks were
16 performed to clean out Hot Cell C (SD-WM-ER-022):

- 17 • All process feed lines and waste lines from B Plant were flushed with demineralized water.
- 18 • All in-cell process pipes were flushed with demineralized water.
- 19 • Interiors of electrical conduits were wiped with a damp sponge.
- 20 • All in-cell jumpers were removed and remained open to allow venting.

21 As a part of hot cell cleanup activities, loose material remaining on the Hot Cells B and C floors was
22 swept up and placed inside capped pipes. Material in the pipes includes strontium fluoride, as well as any
23 other debris that was on the floor of the hot cell.

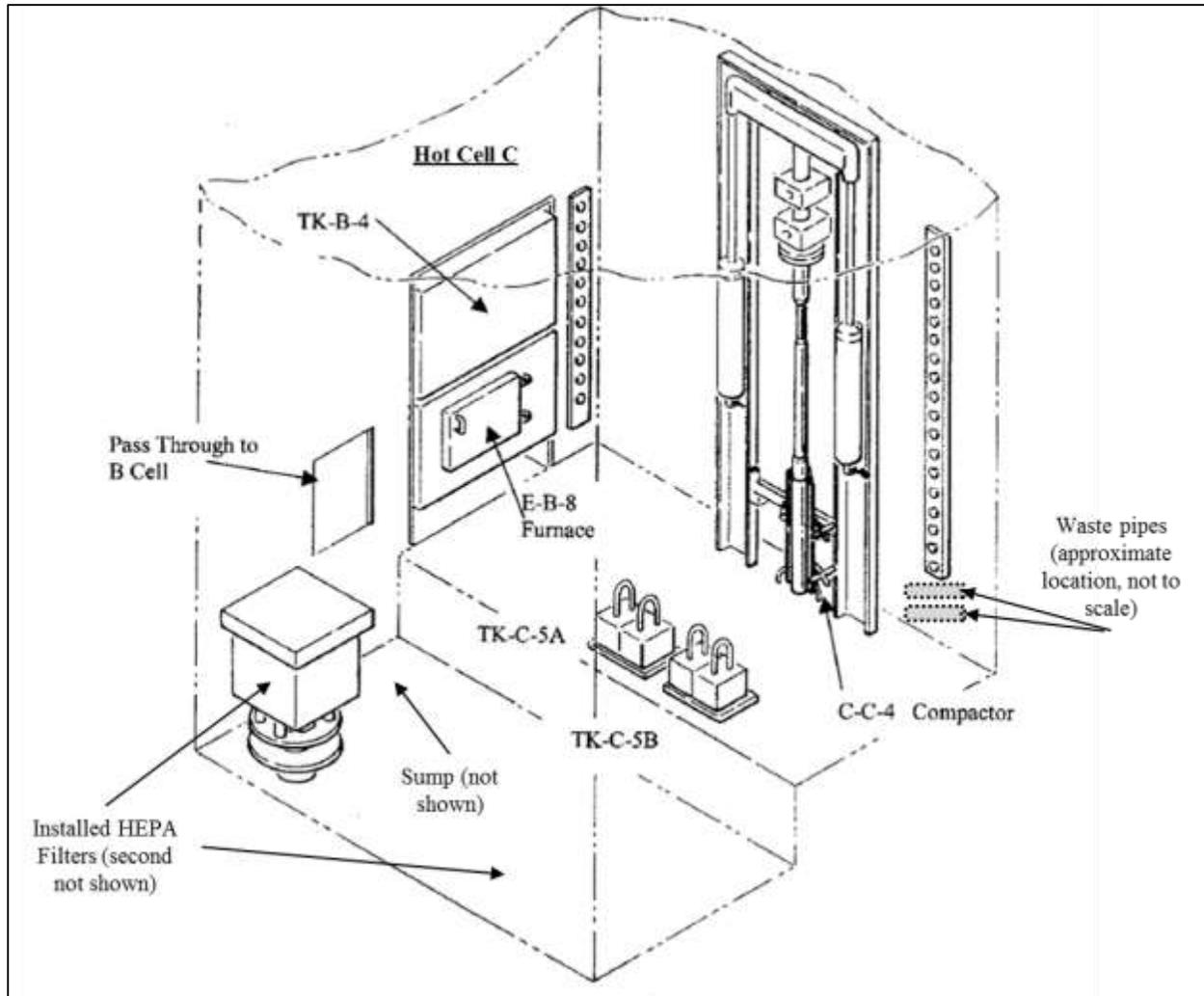


Figure H7. Hot Cell C

H3.4.4 Hot Cell D and Hot Cell E

Hot Cells D and E contain equipment that was used for conversion and encapsulation of cesium chloride. Processing in Hot Cell D consisted of receiving cesium carbonate feed from B Plant and converting it to cesium chloride. Processing performed in Hot Cell E consisted of heating the cesium chloride to remove the water and melt the cesium chloride, pouring the molten salt into the inner capsule, and preparing the capsule for welding. The inner capsule was welded in Hot Cell D, and leak testing was performed in Hot Cell E.

This double hot cell is approximately 5.5 m (18 ft) long by 2.4 m (8 ft) wide by 3.9 m (12.8 ft) high and is partitioned in the middle by a cell parapet wall that is 1.2 m (4 ft) wide by 2.4 m (8 ft) high and 20.3 cm (8 in.) thick. The rear half of the Hot Cell D portion of the floor is elevated approximately 25 cm (10 in.) and is 1.2 m (4 ft) wide. The walls between Hot Cells C and D and between Hot Cells E and F are approximately 51 cm (20 in.) thick and are constructed from reinforced structural concrete 2,400 kg/m³ (150 lb/ft³). The floor and lower portion of the walls are lined with 14-gauge Inconel[®] 600 alloy.

[®] Inconel is a registered trademark of Special Metals Corporation, New Hartford, New York.

1 Figure H8 is an illustration of this double hot cell. It is an isometric looking to the southeast. Hot Cell C
2 is to the east, and Hot Cell F is to the west.

3 A recess in the elevated section of Hot Cell D is provided for placement of the cesium converter tank
4 (TK-D-2). A pass-through with doors is located between Hot Cells C and D and between Hot Cells E
5 and F for passage of small equipment and solid waste. A sump is located on the floor between Hot Cells
6 D and E. It is a small 30 cm by 40 cm by 20 cm deep (12 in. by 16 in. by 8 in. deep) open-topped recess
7 in the floor. A steam eductor (not located in the hot cell) was used to remove liquids that collected in the
8 sump.

9 Hot Cell D contains the following equipment:

- 10 • Feed metering tank (TK-D-1)
- 11 • Converter tank (TK-D-2)
- 12 • Hydrochloric acid scrubbing equipment (TK-D-5, T-D-5, and T-D-7)
- 13 • Vacuum surge tank (TK-D-13)
- 14 • Condensers (E-D-4 and E-D-4A)
- 15 • Process and service piping necessary to support encapsulation operations
- 16 • Two HEPA filters installed in the hot cell exhaust ventilation ducting, as well as two used HEPA
17 filters that were replaced in 2000 and allowed to remain on the hot cell floor

18 Hot Cell E contains the following equipment:

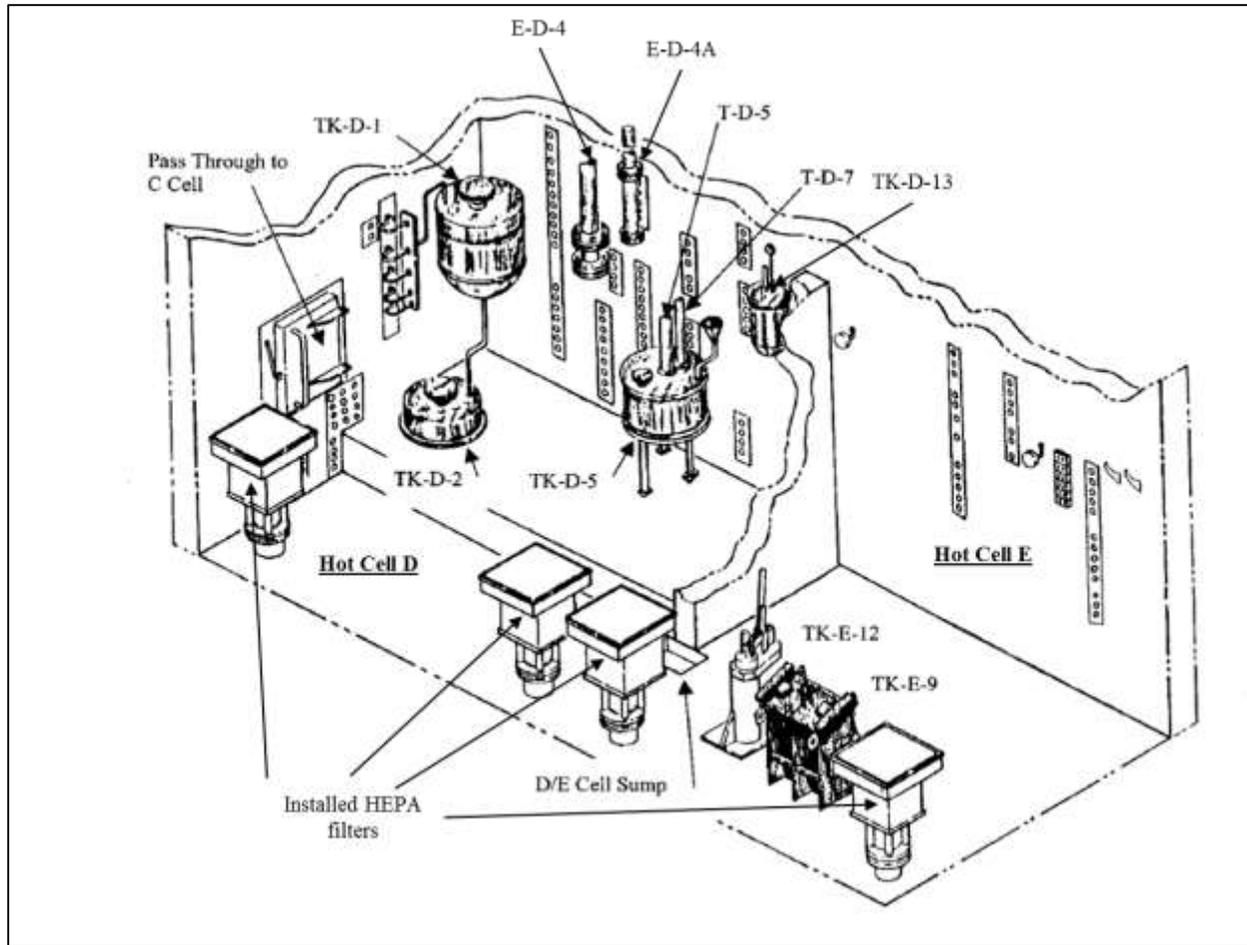
- 19 • Shielded storage location (TK-E-9)
- 20 • Helium leak check chamber (TK-E-12)
- 21 • Process and service piping necessary to support encapsulation operations
- 22 • Two HEPA filters installed in the hot cell exhaust ventilation ducting, as well as two used HEPA
23 filters that were replaced in 2000 and allowed to remain on the hot cell floor

24 Table H1 provides additional details for each listed item.

25 When the cesium encapsulation mission was completed, the following tasks were performed
26 (SD-WM-ER-014, *WESF Cesium Line Standby/Surveillance*):

- 27 • Demineralized water flush on all in-cell jumpers, tanks, and process piping (including TK-D-1,
28 TK-D-2, TK-D-5, T-D-5, and T-D-7).
- 29 • Demineralized water flush on the process feed line between TK-D-1 and B Plant.
- 30 • Demineralized water flush on the drain line between TK-D-1 and B Plant.
- 31 • Flush of TK-D-2 with nitric acid and caustic solution to remove solids.
- 32 • Demineralized water flush on embedded service piping in Hot Cells D and E.
- 33 • Wiping of embedded electrical conduits with a damp sponge.
- 34 • Removal and opening of all in-cell jumpers on tanks to allow venting.

35 The shielded storage location (TK-E-9) and helium leak chamber (TK-E-12) contained complete capsules
36 only. This equipment was not flushed as a part of standby/surveillance activities. SD-WM-ER-014 does
37 not directly state how portions of the vessel ventilation system (condensers E-D-4 and E-D-4A and
38 vacuum surge tank TK-D-13) were placed in standby. It is likely but not certain that they were also
39 flushed with demineralized water with the rest of the in-cell jumpers and piping.



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Figure H8. Hot Cell D and Hot Cell E

H3.4.5 Hot Cell F

Hot Cell F contains equipment that was used for storage and decontamination of the inner capsules.

The inside dimensions of Hot Cell F are 2.4 m (8 ft) long by 2.4 m (8 ft) wide by 3.9 m (12.8 ft) high. The rear portion of the hot cell floor is elevated 55.9 cm (22 in.) and is 0.6 m (2 ft) wide. The wall between Hot Cells F and G is approximately 89 cm (35 in.) thick and is constructed from high-density reinforced structural concrete $3,760 \text{ kg/m}^3$ (235 lb/ft³). The floor and lower portion of the walls are lined with 14-gauge 304L stainless steel. Figure H9 is an illustration of the hot cell. It is an isometric looking southeast. Hot Cell E is to the east, and Hot Cell G is to the west.

A recess in the elevated portion of the hot cell floor is provided for placement of a shielded capsule storage location. A pass-through with doors is located between Hot Cells E and F and between Hot Cells F and G for passage of small equipment and solid waste. There is also a pass-through with doors between Hot Cell F and the service gallery on the south wall. Hot Cell F does not contain any process piping.

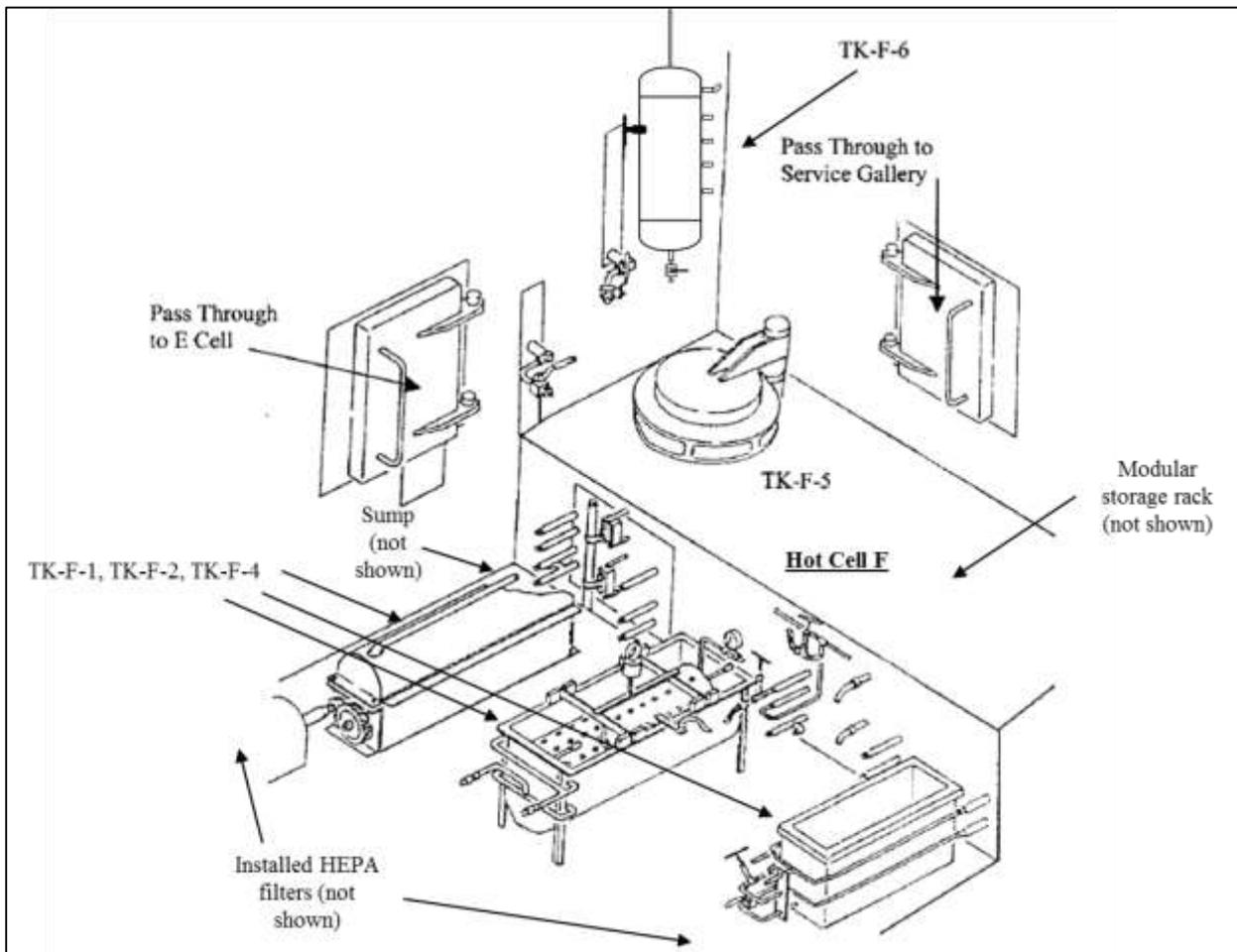
A sump is located on the floor on the east wall of the hot cell, next to the elevated area. It is a small 30 cm by 40 cm by 20 cm deep (12 in. by 16 in. by 8 in. deep) open-topped recess in the floor. A steam eductor (not located in the hot cell) was used to remove liquids that collected in the sump. After water sources to the hot cells were isolated in 2001, an air driven sump pump was installed in Hot Cell F for transfer of collected liquids to the radioactive low-level waste (LLW) tank (Tank-100). As part of the closure of Hot Cells A through F, this transfer line will be isolated.

1 Hot Cell F contains the following equipment:

- 2 • Capsule scrubber (TK-F-1)
- 3 • Electropolisher (TK-F-2)
- 4 • Capsule rinse location (TK-F-4)
- 5 • Storage location (TK-F-5)
- 6 • Air receiver tank (TK-F-6)
- 7 • Modular storage rack
- 8 • Service piping necessary to support encapsulation operations
- 9 • Two HEPA filters installed in the hot cell exhaust ventilation ducting as well as two used HEPA
- 10 filters that were replaced in 2000 and allowed to remain on the hot cell floor
- 11 • Manipulators that will be removed during closure

12 Table H1 provides additional details for each listed item.

13 During processing, the cell was rinsed with water to minimize contamination spread to the capsules, prior
 14 to transfer to Hot Cell G. This practice kept the contamination levels in Hot Cell F low. Since the end of
 15 encapsulation operations, the hot cell has been swept and vacuumed, and miscellaneous parts/tools have
 16 been removed.



17 **Figure H9. Hot Cell F**

Table H1. WESF Hot Cells A through F Contents

Hot Cell	Hot Cell Contents	Content Description	Waste Description
A	Drum Dolly Lift	Equipment required for handling 208 L (55 gal) drums used to package the radioactive solid waste from the other hot cells.	Hazardous Debris
	Hood	1.2 m (4 ft) by 2.4 m (8 ft) by 1.2 m (4 ft) stainless steel hood.	
	HEPA Filters	Filters replaced in 2000; old filters remain on cell floor.	
	Service Piping Associated with Processing	Air and liquid service embedded lines from outside service areas and electrical lines.	
B	Four Trays of Strontium Floor Sweepings Inside the Furnace	Boats are open and contain strontium floor sweepings. Approximately 0.6 kg (1.2 lb) total waste.	Waste/Waste Residues
	Strontium Filter Assembly (F-B6-1 to F-B6-5)	Each filter housing is approximately 27.3 cm (10.8 in.) tall with 10.2 cm (4 in.) diameter; approximately 45% void. The filter housings were opened, and the sintered metal filters were removed. Both the filter housings and the filters were free of obvious material.	Hazardous Debris
	Process and Service Piping Associated with Processing	Process piping used to convey strontium solutions between tanks and processing equipment. Air and liquid service embedded lines from outside service areas and electrical lines. Embedded lines used as electrical conduits during processing were wiped internally with damp sponges to remove internal contamination.	
	HEPA Filters	Filters replaced in 2000; old filters remain on cell floor.	
	Feed Metering Vessel Tank (TK-B-1)	Cylindrical tank, vertical and unbaffled, 68.6 cm (27 in.) tall with 52.7 cm (20.8 in.) diameter. Tank has nozzles open to the cell atmosphere.	
Supernatant Holding Tank (TK-B-2)	Cylindrical tank, vertical and unbaffled, with a dish shaped bottom with flanged heads; 91.4 cm (36 in.) tall with 61 cm (24 in.) diameter. Tank has nozzles open to the cell atmosphere.		

Table H1. WESF Hot Cells A through F Contents

Hot Cell	Hot Cell Contents	Content Description	Waste Description
	Waste Holding Tank (TK-B-4)	Rectangular tank, vertical and un baffled. 50.8 cm (20 in.) wide, 76.2 cm (30 in.) long, and 52.1 cm (21 in.) tall. Tank has nozzles open to the cell atmosphere. Located in the wall between B and C cells.	
	Precipitator Tank (TK-B-5)	Cylindrical, vertical, un baffled tank in the upper section and conical tank in the lower section. Upper section is 43.2 cm (17 in.) high with 61 cm (24 in.) diameter. Lower section is 48.3 cm (19 in.) high and tapers from a diameter of 61 cm (24 in.) to 15.2 cm (6 in.). Tank has nozzles open to the cell atmosphere.	
	Strontium Furnace (E-B-8)	Rectangular, approximately 52.7 cm (21 in.) wide, 76.2 cm (30 in.) long, and 52.1 cm (21 in.) tall. Located in wall between B and C cells.	
C	Process and Service Piping Associated with Processing	Process piping used to convey strontium solutions between tanks and processing equipment. Embedded lines, used as electrical conduits, raw water supply, compressed air, and argon supply.	Hazardous Debris
	HEPA Filters	Filters replaced in 2000; old filters remain on cell floor.	
	Strontium Compactor (C-C-4)	Used to compact strontium fluoride material in the capsule.	
	Shielded Storage Locations (TK-C-5A and TK-C-5B)	Identical shielded storage locations recessed in the C Cell floor. Annular configuration is approximately 45.7 cm (18 in.) long. These locations were used to store inner capsules and did not contain unencapsulated strontium.	
	Two Closed Waste Pipes	Two closed waste pipes with approximately 61 cm (24 in.) long with a pipe cap at each end with material swept from the floor of B Cell or C Cell after it was dried and reduced in volume in the furnace. These containers are stored in the southwest corner of the cell on wall brackets above the bench floor. Total approximate waste volume is 1.2 kg (2.6 lb).	Waste/Waste residues

Table H1. WESF Hot Cells A through F Contents

Hot Cell	Hot Cell Contents	Content Description	Waste Description
D/E	Process and Service Piping Associated with Processing	Process piping used to convey cesium solutions between tanks and processing equipment. Air and liquid service embedded lines from outside service areas and electrical lines.	Hazardous Debris
	Feed Metering Tank (TK-D-1)	Cylindrical tank 68.6 cm (27 in.) tall with 53.34 cm (21 in.) diameter. Tank has nozzles open to the cell atmosphere.	
	Converter Tank (TK-D-2)	Cylindrical tank 54.6 cm (21.5 in.) tall with 50.8 cm (20 in.) diameter. Tank has nozzles open to the cell atmosphere.	
	Hydrochloric Acid Scrubbing Equipment (TK-D-5, T-D-5, and T-D-7)	T-D-5 is 1.4 m (4.75 ft) tall, and T-D-7 is 1.9 m (6.3 ft) tall; both towers are 10.2 cm (4 in.) in diameter and contain 1.2 m (4 ft) of packing (pall rings). Tank has nozzles open to the cell atmosphere.	
	Vacuum Surge Tank (TK-D-13)	Cylindrical tank 16 in. tall with 8 in. diameter. The vacuum surge tank was part of the vessel ventilation system.	
	Condensers (E-D-4 and E-D-4A)	E-D-4 is a cylindrical tank approximately 140 cm (55 in.) tall with 20.3 cm (8 in.) diameter. E-D-4A is a cylindrical tank approximately 74 cm (29 in.) tall with 10.2 cm (4 in.) diameter. The condensers were part of the vessel ventilation system.	
	Shielded Storage Location (TK-E-9)	Rectangular storage location approximately 30.5 cm (12 in.) by 48.3 cm (19 in.) wide and 55.9 cm (22 in.) tall. This location was used to store inner cesium capsules and did not contain unencapsulated material.	
	Helium Leak Check Chamber (TK-E-12)	Outer shell with approximately 11.4 cm (4.5 in.) diameter and approximately 61 cm (24 in.) long. The helium leak chamber only contained completed inner capsules and did not contain unencapsulated material.	
HEPA Filters	Filters replaced in 2000; old filters remain on cell floor.		

Table H1. WESF Hot Cells A through F Contents

Hot Cell	Hot Cell Contents	Content Description	Waste Description
F	HEPA Filters	Filters replaced in 2000; old filters remain on cell floor.	Hazardous Debris
	Manipulators	Manipulators will be removed prior to addition of grout.	
	Service Piping Associated with Processing	Air and liquid service embedded lines from outside service areas and electrical lines.	
	Capsule Scrubber (TK-F-1)	Open top rectangular tank approximately 78.7 cm (31 in.) long by 35.6 cm (14 in.) wide by 35.6 cm (14 in.) high. Contained complete capsules only.	
	Electropolisher (TK-F-2)	Open top rectangular tank approximately 78.7 cm (31 in.) long by 35.6 cm (14 in.) wide by 35.6 cm (14 in.) high. Contained complete capsules only	
	Capsule Rinse Location (TK-F-4)	Open top rectangular storage location approximately 78.7 cm (31 in.) long by 35.6 cm (14 in.) wide by 35.6 cm (14 in.) high. This equipment contained capsules only.	
	Storage Location (TK-F-5)	Cylindrical storage location approximately 72.4 cm (29 in.) deep with 41.9 cm (17 in.) diameter. This storage location was used for the storage of capsules only.	
	Air Receiver Tank (TK-F-6)	Cylindrical storage location approximately 64.8 cm (26 in.) tall with 20.3 cm (8 in.) diameter. This tank was part of the clean air supply system. It provided clean air at a constant pressure to hot cell equipment.	
	Modular Storage Rack	Rack consists of open tubes used for storage of capsules.	

1 **H3.4.6 Hot Cell Viewing Windows**

2 Lead glass windows are provided for shielding and direct viewing into the hot cells from the operating
3 gallery. The viewing windows are composed of 25.4 cm (10 in.) of 3.3 g/cm³ lead glass (hot cell side)
4 and 39.6 cm (15.6 in.) of 6.2 g/cm³ lead glass (operating gallery side).

5 Oil between the glass sections allows light to pass through the windows. The soft lead glass is protected
6 by cerium stabilized, nonbrowning, tempered glass on the hot cell side and tempered glass on the
7 operating gallery side. The oil will be removed from the Hot Cells A through F windows, before start of
8 closure, using the work package process including waste planning. The oil between the glass sections is a
9 white mineral oil (Chemical Abstracts Service number 8042-47-5) with no hazardous properties.
10 Upon removal, the oil will be containerized and managed as a nondangerous maintenance waste.

11 Currently, the window in Hot Cell C is not clear enough to allow viewing into the hot cell. Viewing into
12 Hot Cells A, B, D, and E is not possible because lighting inside the cells has failed.

13 **H3.4.7 Hot Cell Manipulators**

14 Hot Cell A has wall ports for four manipulators. Hot Cells B through F each have wall ports for two
15 manipulators that can be installed or removed from the hot cells through 25.4 cm (10 in.) diameter ports
16 in the wall.

17 Manipulators are removed from Hot Cells A through E, and plugs have been installed in the ports for
18 contamination control.

19 Manipulators in Hot Cell F will be removed, and the ports will be plugged prior to the start of
20 stabilization activities.

21 **H3.4.8 Hot Pipe Trench and K3 Duct Trench**

22 The hot pipe trench is a concrete channel, 1.5 m (5 ft) wide by 0.6 m (2 ft) deep, that contains the process
23 feed piping that was used to transfer solutions from B Plant to WESF. The hot pipe trench also contains
24 lines for transferring solutions from WESF back to B Plant.

25 The hot pipe trench is located beneath the floor of the hot cells and extends from Hot Cell G to the west
26 wall of B Plant. At the west wall of B Plant, the hot pipe trench is reduced to a 35.6 cm (14 in.) stainless
27 steel pipe encasement that terminates in Cell 39 at B Plant.

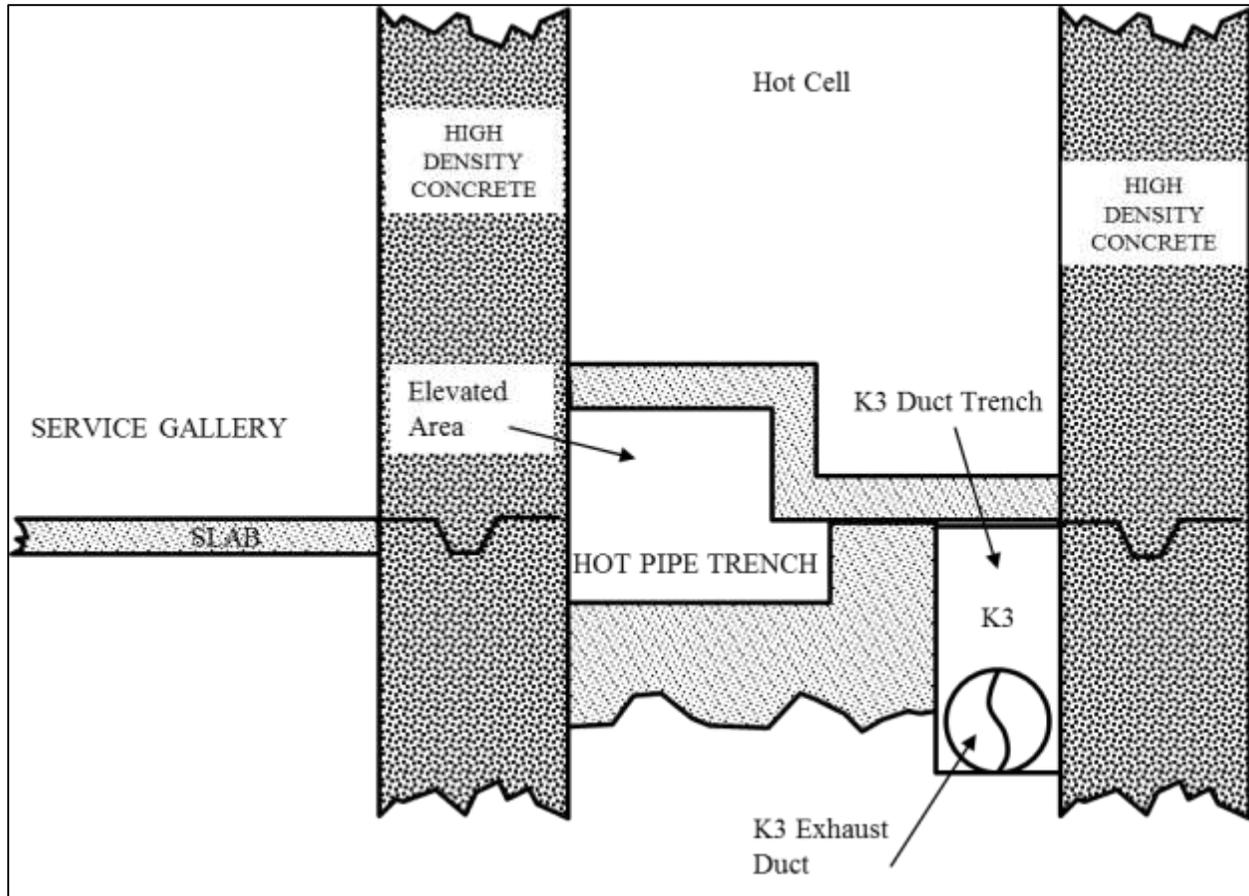
28 The walls of the hot pipe trench and encasement are constructed of high-density concrete and are lined
29 with lead, where required, to provide shielding. B Plant has been isolated from WESF, and piping in the
30 hot pipe trench is no longer used and is capped in B Plant.

31 When processing was completed at WESF before 1985, process transfer lines in the hot pipe trench were
32 flushed with demineralized water. These lines have not been used for any processing since the WESF hot
33 cells were placed in standby/surveillance mode. The transfer lines are expected to contain radiological
34 contamination.

35 Process piping located in the hot pipe trench will not be filled with grout. The largest process feed pipe
36 inside the hot pipe trench that will not be grouted is approximately 7.6 cm to 10.2 cm (3 to 4 in.) and will
37 not cause structural integrity issues due to void space.

38 The K3 duct trench is approximately 0.6 m (2 ft) wide and 0.9 m (3 ft) deep. It runs underneath the hot
39 cells and contains the K3 exhaust duct. Figure H10 shows the general configuration of the hot pipe
40 trench, hot cells, and K3 duct trench. The elevated area is not present in all hot cells.

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2 **Figure H10. Hot Pipe Trench and K3 Duct Trench**

3 **H3.4.9 Tank-100**

4 The WESF LLW collection tank (Tank-100) is an approximately 15,000 L (4,000 gal) stainless steel tank
5 contained in a below-grade reinforced concrete vault with cover blocks. The tank is located on the
6 outside of WESF, on the south side, and is not within a DWMU. The tank is under active ventilation
7 from the K3 exhaust ventilation system and will be ventilated by the new system. Any liquid LLW
8 generated in the hot cells would be transferred to Tank-100. As part of the closure activities, all hot cells
9 (including Hot Cell G) will be isolated from this tank.

10 Tank-100 was replaced in 1998. Tank contents were sampled to support disposal of the removed tank and
11 found to contain 1,1,1-trichloroethane. The original Tank-100 system, that was replaced in 1998, was
12 clean closed in accordance with WAC 173-303-610, "Dangerous Waste Regulations," "Closure and
13 Post-Closure," as documented by 98-EAP-588, "Closure Certification of the Waste Encapsulation and
14 Storage Facility (WESF) Tank 100 (TK-100) System." 1,1,1-trichloroethane was not used at WESF after
15 closure of Tank-100 in 1998, and no mixed waste management activities have occurred in the hot cells
16 since the tank was replaced.

17 **H3.4.10 WESF Ventilation System**

18 The WESF ventilation system (Figures H11 and H12) is permitted for operation, under a Washington
19 State Department of Health license and the Hanford Air Operating Permit, and is not part of the Hot Cell
20 A through Hot Cell F DWMU. However, information is provided in this closure plan as part of the unit
21 description to provide a complete understanding of the WESF facility.

1 The ventilation system at WESF is designed to produce pressure boundaries that prevent migration from
2 areas contaminated with radioactive particulates to areas with less potential for contamination to the
3 atmosphere. Contaminated areas are maintained at a negative pressure with respect to
4 uncontaminated areas.

5 A second major function of the WESF ventilation system is the removal of hydrogen gas generated from
6 the radiolysis of water resulting from the underwater storage of highly radioactive cesium and strontium
7 capsules in the WESF pool cells. Hydrogen removal from the hot cells is not a significant concern, even
8 if capsules are being stored in Hot Cells F or G, because all water sources have been removed from the
9 hot cells.

10 Four separate supply systems (K1, K2, K3, and K4) and three separate exhaust systems service WESF.
11 K1 and K3 systems are the only two that exhaust potentially contaminated air. The K2 exhaust system
12 ventilates normally clean areas of WESF. K1 and K3 exhaust systems combine after the respective
13 HEPA filters to exhaust air through a single monitored stack (296-B-10). Only portions of the K3
14 ventilation system that require grouting as part of the closure for the Hot Cell A through Hot Cell F
15 DWMU will be discussed further in this closure plan.

16 **H3.4.11 K3 Exhaust System**

17 The K3 exhaust system ventilates the canyon and hot cells. These are the most contaminated areas of the
18 building and are maintained at the most negative pressure. The K3 exhaust fan draws air from the canyon
19 and hot cells and passes it through the K3 HEPA filters before it exits through the monitored
20 296-B-10 stack.

21 Each hot cell has two exhaust paths to a common duct, and each exhaust path has one stage of HEPA
22 filtration. The final K3 HEPA filters consist of two parallel filter housings. Each filter housing unit is
23 located in a separate K3 filter pit.

24 The underground K3 exhaust duct, filter housings, and filter pit will be filled with grout to stabilize the
25 contamination contained with these areas. A new K3N ventilation system will be installed to replace the
26 function of the K3 exhaust system. The K3N system will consist of a filter housing with two redundant
27 exhaust fans. The filter housing will include two HEPA sections in series, with each HEPA section
28 consisting of six individual HEPA filters. It will ventilate the canyon, Hot Cell G, and Tank-100.
29 The fan will draw air from these spaces through the HEPA filter before it exits through the monitored
30 296-B-10 stack.

31

1 **H3.4.12 Maximum Waste Inventory**

2 WESF currently stores 1,936 capsules (the maximum number of capsules that are available to be stored).
3 The waste volume inside each capsule is approximately 1 L (0.264 gal). Therefore, the maximum waste
4 inventory of WESF is approximately 1,936 L (511 gal). Capsules are stored within the two operating
5 DWMUs and will not be impacted by closure activities described in this plan.

6 Hot Cells A through F do not store any capsules and did not store any waste capsules after the effective
7 date of RCRA at the Hanford Facility in August 1987.

8 The furnace, located in the wall between Hot Cells B and C, holds approximately 0.6 kg (1.3 lb) of waste
9 in four trays inside the furnace. Hot Cell C holds approximately 1.2 kg (2.6 lb) of waste in two threaded,
10 capped pipes.

11 The contents of Hot Cells A through F are detailed in Table H1.

12 **H4 CLOSURE PERFORMANCE STANDARD**

13 This closure plan covers initial closure actions for the Hot Cell A through Hot Cell F DWMU. Final
14 clean closure of the Hot Cell A through Hot Cell F DWMU will be completed concurrent with closure
15 activities for the remaining two operating WESF DWMUs. Closure performance standards for final
16 closure of WESF will be based on WAC 173-303-610(2), which requires closure of the facility in a
17 manner that accomplishes the following objectives:

- 18 • Minimize the need for further maintenance.
- 19 • Control, minimize, or eliminate, to the extent necessary, to protect human health and the
20 environment (HHE), post-closure escape of dangerous waste, dangerous constituents, leachate,
21 contaminated runoff, or dangerous waste decomposition products to the ground, surface water,
22 groundwater, or atmosphere.
- 23 • Return the land to the appearance and use of surrounding land areas, to the degree possible, given
24 the nature of the previous dangerous waste activity.

25 These performance standards are met through Sections H4.1 and H5.11.

26 Final clean closure of the remaining two DWMUs associated with the WESF Operating Unit Group will
27 be addressed in WA7890008967, *Hanford Facility Dangerous Resource Conservation and Recovery Act*
28 *Permit*, Revision 9, Part III, Operating Unit Group 14, Waste Encapsulation and Storage Facility.

29 **H4.1 Clean Closure Levels**

30 The Hot Cell A through Hot Cell F DWMU will be clean closed. Once the stabilized hot cells have been
31 removed, the remaining underlying soil will be sampled and must meet clean closure levels.
32 In accordance with WAC 173-303-610(2)(b)(i), clean closure levels for the soil are the numeric cleanup
33 levels calculated using unrestricted use exposure assumptions according to WAC 173-340, “Model
34 Toxics Control Act—Cleanup,” hereinafter called MTCA, regulations (WAC 173-340-700, “Overview of
35 Cleanup Standards,” through WAC 173-340-760, “Sediment Cleanup Standards,” excluding
36 WAC 173-340-745, “Soil Cleanup Standards for Industrial Properties”). These numeric cleanup levels
37 have been calculated according to the requirements of WAC 173-303-610(2)(b)(i) as of the effective date
38 of the permit modification. These cleanup levels consider carcinogens, and noncarcinogens values.

39 The miscellaneous unit performance standards identified in WAC 173-303-680(2)(b)(i) through (4), as
40 required by WAC 173-303-610(2)(b), are addressed in Table H2.

41 A null hypothesis is generally assumed to be true until evidence indicates otherwise. The null hypothesis,
42 as defined in WAC 173-340-200, “Definitions,” for Hot Cells A through F is that the underlying soil,
43 once the hot cells have been removed, is assumed to be above unrestricted use cleanup levels, commonly
44 called MTCA (WAC 173-340) Method B levels. Therefore, the site is presumed to be contaminated.

- 1 Rejection of the null hypothesis means that sampling and analysis results of the site indicated soil
- 2 contamination below the MTCA Method B levels. Sampling and analysis in accordance with the
- 3 sampling and analysis plan (SAP) (Section H5.12) will be used to determine whether the null hypothesis
- 4 can be rejected, thereby confirming that soil meets the closure performance standards (MTCA Method B).
- 5 Since the DWMU is anticipated to be clean, should sampling and analysis determine that the null
- 6 hypothesis can be accepted, indicating that the site is contaminated, such an event will be considered an
- 7 unexpected event during closure, and the soil would then be identified as contaminated environmental
- 8 media and managed in accordance with Section H5.10.

Table H2 WAC 173-303-680(2) through (4) Requirements

Requirement	Method of Compliance
<p>(2) Environmental performance standards. A miscellaneous unit must be located, designed, constructed, operated, maintained, and closed in a manner that will ensure protection of human health and the environment. Permits for miscellaneous units are to contain such terms and provisions as necessary to protect human health and the environment, including, but not limited to, as appropriate, design and operating requirements, detection and monitoring requirements, and requirements for responses to releases of dangerous waste or dangerous constituents from the unit. Permit terms and provisions must include those requirements in <u>WAC 173-303-630</u> through <u>173-303-670</u>, 40 CFR. Subparts AA through CC, which are incorporated by reference at <u>WAC 173-303-690</u> through <u>173-303-692</u>, <u>WAC 173-303-800</u> through <u>173-303-806</u>, part 63 subpart EEE (which is incorporated by reference at <u>WAC 173-400-075 (5)(a)</u>), and <u>40 CFR, Part 146</u> that are appropriate for the miscellaneous units being permitted. Protection of human health and the environment includes, but is not limited to:</p>	<p>The Hot Cell A through Hot Cell F DWMU will be closed in a manner that will ensure protection of HHE through the activities identified in this closure plan, which was developed in accordance with and to meet the regulatory requirements of <u>WAC 173-303-610</u>.</p>
<p>(a) Prevention of any releases that may have adverse effects on human health or the environment due to migration of wastes constituents in the groundwater or subsurface environment, considering:</p>	<p>Grouting of Hot Cells A through F will prevent migration of dangerous waste constituents to the groundwater or subsurface environment below WESF.</p>
<p>(i) The volume and physical and chemical characteristics of the waste in the unit, including its potential for migration through soil, liners, or other containing structures;</p>	
<p>(ii) The hydrologic and geologic characteristics of the unit and the surrounding area;</p>	
<p>(iii) The existing quality of groundwater, including other sources of contamination and their cumulative impact on the groundwater;</p>	
<p>(iv) The quantity and direction of groundwater flow;</p>	
<p>(v) The proximity to and withdrawal rates of current and potential groundwater users;</p>	
<p>(vi) The patterns of land use in the region;</p>	
<p>(vii) The potential for deposition or migration of waste constituents into subsurface physical structures, and into the root zone of food-chain crops and other vegetation;</p>	
<p>(viii) The potential for health risks caused by human exposure to waste constituents; and (ix) The potential for damage to domestic animals, wildlife, crops, vegetation, and physical structures caused by exposure to waste constituents.</p>	
<p>(b) Prevention of any release that may have adverse effects on human health or the environment due to migration of waste constituents in surface water, or wetlands or on the soil surface considering:</p>	<p>Grouting of Hot Cells A through F will prevent migration of dangerous waste constituents to the soil surface under WESF. There are no surface waters or wetlands in the proximity of WESF.</p>
<p>(i) The volume and physical and chemical characteristics of the waste in the unit;</p>	

Table H2 WAC 173-303-680(2) through (4) Requirements

Requirement	Method of Compliance
(ii) The effectiveness and reliability of containing, confining, and collecting systems and structures in preventing migration;	
(iii) The hydrologic characteristics of the unit and the surrounding area, including the topography of the land around the unit	
(iv) The patterns of precipitation in the region;	
(v) The quantity, quality, and direction of groundwater flow;	
(vi) The proximity of the unit to surface waters;	
(vii) The current and potential uses of nearby surface waters and any water quality standards established for those surface waters;	
(viii) The existing quality of surface waters and surface soils, including other sources of contamination and their cumulative impact on surface waters and surface soils;	
(ix) The patterns of land use in the region;	
(x) The potential for health risks caused by human exposure to waste constituents; and	
(xi) The potential for damage to domestic animals, wildlife, crops, vegetation, and physical structures caused by exposure to waste constituents.	
(c) Prevention of any release that may have adverse effects on human health or the environment due to migration of waste constituents in the air, considering:	
(i) The volume and physical and chemical characteristics of the waste in the unit, including its potential for the emission and dispersal of gases, aerosols and particulates;	
(ii) The effectiveness and reliability of systems and structures to reduce or prevent emissions of dangerous constituents to the air;	
(iii) The operating characteristics of the unit;	
(iv) The atmospheric, meteorologic, and topographic characteristics of the unit and the surrounding area;	
(v) The existing quality of the air, including other sources of contamination and their cumulative impact on the air;	
(vi) The potential for health risks caused by human exposure to waste constituents; and	

Table H2 WAC 173-303-680(2) through (4) Requirements

Requirement	Method of Compliance
(vii) The potential for damage to domestic animals, wildlife, crops, vegetation, and physical structures caused by exposure to waste constituents.	duct trench, and A Cell airlock will discharge inside the 225B Building, which is an abated air space. The portable ventilation systems used to support grouting of the K3 filter pit will discharge outside, and abatement and monitoring controls will be implemented. This activity will be licensed separately if the existing site license cannot be used.
(3) Monitoring, analysis, inspection, response, reporting, and corrective action. Monitoring, testing, analytical data, inspections, response, and reporting procedures and frequencies must ensure compliance with subsection (2) of this section, <u>WAC 173-303-320</u> , <u>173-303-340(1)</u> , <u>173-303-390</u> , and <u>173-303-64620</u> as well as meet any additional requirements needed to protect human health and the environment as specified in the permit.	The stabilized hot cells will be maintained in a manner that prevents threats to HHE and monitored through routine radiation surveillances, using radiation as an indication of contamination outside the stabilized Hot Cell A through Hot Cell F DWMU.
<u>WAC 173-303-320 Inspections</u>	Inspections of the Hot Cell A through Hot Cell F DWMU are addressed in Section H5.2.
<u>WAC 173-303-340(1)</u>	WESF complies with annual reporting requirements through Hanford Facility Permit, Condition II.B.
<u>WAC 173-303-390 Facility Reporting</u>	
1. Unmanifested Waste Reports	N/A – WESF Hot Cell A through Hot Cell F DWMU will not be receiving additional waste shipments during closure.
2. Annual Reports	WESF complies with annual reporting requirements through Hanford Facility Permit, Condition I.E.22.
3. Additional Reports	
a. Releases of dangerous waste, fires, and explosions	Reports regarding releases of dangerous waste, fires, and explosions are addressed in DOE/RL-94-02, <i>Hanford Emergency Response Plan</i> .
b. Interim status groundwater monitoring data	N/A – WESF Hot Cells A through F are not a land disposal unit or surface impoundment, and groundwater monitoring is not required.
c. Facility closures specified in <u>WAC 173-303-610(6)</u>	Closure certification is addressed in Section H5.14 of this closure plan.

Table H2 WAC 173-303-680(2) through (4) Requirements

Requirement	Method of Compliance
<p>d. As otherwise required by <u>WAC 173-303-645</u> through <u>173-303-665</u>, <u>WAC 173-303-690</u> through <u>173-303-692</u>, and <u>WAC 173-303-400</u>.</p>	<p>There have not been any releases from the Hot Cell A through Hot Cell F DWMU that are subject to the corrective action requirements. Air emission standards are met through the WESF K3 ventilation system.</p>
<p>4. Recordkeeping</p>	<p>WESF maintains a facility operating record in accordance with Hanford Facility Permit, Condition II.I.</p>
<p><u>WAC 173-303-64620 Corrective Action</u></p>	<p>There have not been any releases from the Hot Cell A through Hot Cell F DWMU that are subject to corrective action requirements.</p>
<p>(4) Post-closure care. A miscellaneous unit that is a disposal unit must be maintained in a manner that complied with subsection (2) of this section during the post-closure care period. In addition, if a treatment or storage unit has contaminated soils or groundwater that cannot be completely removed or decontaminated during closure, then that unit must also meet the requirements of subsection (2) of this section during post-closure care. The post-closure plan under <u>WAC 173-303-610(8)</u> must specify the procedures that will be used to satisfy this requirement.</p>	<p>The Hot Cell A through Hot Cell F DWMU will be clean closed. No post-closure care is required.</p>

1 H5 CLOSURE ACTIVITIES

2 The Hot Cell A through Hot Cell F DWMU does not store capsules and will not be used in future waste
3 management activities at WESF. As a result, Hot Cells A through F will undergo closure to minimize the
4 need for further maintenance and eliminate the potential for the release of dangerous constituents from the
5 DWMU.

6 As described in Section H3.4 of this closure plan, the hot cells were used to encapsulate Cs-137 and Sr-90
7 that had been separated from plutonium production waste in B Plant. As a result, the hot cells became
8 contaminated with a significant amount of Cs-137 and Sr-90, along with smaller amounts of dangerous
9 constituents.

10 The K3 exhaust ventilation system controls the release of contamination from the hot cells. This aging
11 system relies on HEPA filters that have exceeded their operational life and need to be replaced.

12 However, replacement of the filters is impractical due to the high levels of radionuclide contamination.

13 A project has been initiated to address K3 ventilation system issues. Implementation of this project will
14 include initial closure activities for the Hot Cell A through Hot Cell F DWMU, along with installation of
15 a new ventilation system. Although the ventilation system is not part of the DWMU, it is discussed in
16 this closure plan so the reader can fully understand the approach for initial closure activities of the
17 DWMU.

18 The integrated approach to complete initial closure activities of the DWMU includes the following tasks:

- 19 • Replace the K3 exhaust ventilation system with a new system (K3N). The K3N system will
20 ventilate the Hot Cell A through Hot Cell F DWMU during initial closure activities. The K3N
21 system will also provide ventilation for Hot Cell G, which is one of the two DWMUs that will
22 remain operational at WESF.
- 23 • Stabilize legacy contamination in the K3 exhaust ventilation system and in Hot Cells A through
24 F. Stabilization will be accomplished by filling contaminated areas with grout.

25 Completion of this project will also support eventual removal of cesium and strontium capsules, which
26 are currently in the pool cells at WESF, and subsequent transfer of the capsules to a newly constructed
27 treatment, storage, and/or disposal (TSD) unit.

28 Significant modifications to hot cells will be performed to enable replacement of the aging ventilation
29 system, including the introduction of grout. Modifications have been analyzed to ensure that the safety
30 functions of the structures are not negatively impacted. These structural evaluations are documented in
31 CHPRC-02270, *Structural Evaluation for Grouting the 225-B Building Hot Cells*; CHPRC-02420, *W-130*
32 *Project Building 225B South Wall K3N Duct Penetration Analysis*; and CHPRC-02531, *W-130 Project*
33 *Structural Evaluation of Vertical Core Drill Through Hot Cell Divider Walls*.

34 Initial closure activities for the Hot Cell A through Hot Cell F DWMU consists of the following main
35 tasks:

- 36 • Site preparation
- 37 • Unit modification and evaluation prior to stabilization
- 38 • Stabilization of contamination within WESF

39 Following completion of the initial Hot Cell A through Hot Cell F DWMU closure activities described, an
40 extended closure period will begin prior to completion of final Hot Cell A through Hot Cell F DWMU
41 closure activities. Final closure activities for the Hot Cell A through Hot Cell F DWMU will be
42 completed concurrent with closure activities for the remaining two operating WESF DWMUs. Final
43 clean closure activities for the Hot Cell A through Hot Cell F DWMU consist of the following main tasks:

- 1 • Demolition and removal of the Hot Cell A through Hot Cell F DWMU
- 2 • Management and disposal of the hazardous debris
- 3 • Visual verification of underlying soil
- 4 • Sampling and analysis to confirm clean closure

5 **H5.1 Health and Safety Requirements**

6 Closure will be performed in a manner to ensure the safety of personnel and the surrounding environment.
7 Qualified personnel will perform any necessary closure activities in compliance with established safety
8 and environmental procedures. Personnel will be equipped with appropriate personal protective
9 equipment (PPE). Qualified personnel will be trained in applicable safety and environmental procedures
10 and have appropriate training and experience in sampling activities. Field operations will be performed in
11 accordance with applicable health and safety requirements.

12 The Permittees have instituted training or qualification programs to meet training requirements imposed
13 by regulations, DOE orders, and national standards such as those published by the American National
14 Standards Institute/American Society of Mechanical Engineers. For example, the environmental, safety,
15 and health training program provides workers with the knowledge and skills necessary to execute
16 assigned duties safely. The Hanford Facility RCRA Permit, Attachment 5, describes specific
17 requirements for the Hanford Facility Personnel Training program. The Permittees will comply with the
18 training matrix shown in Table H3, which provides training requirements for Hanford Facility personnel
19 associated with closure activities for the Hot Cell A through Hot Cell F DWMU.

20 Project-specific safety training addressed explicitly to the project and day's activity will include training
21 to provide the knowledge and skills needed for personnel to perform work safely and in accordance with
22 quality assurance (QA) requirements.

23 Pre-job briefings will be performed to evaluate activities and associated hazards by considering the
24 following factors:

- 25 • Objective of the activities
- 26 • Individual tasks to be performed
- 27 • Hazards associated with the planned tasks
- 28 • Environment in which the job will be performed
- 29 • Facility where the job will be performed
- 30 • Equipment and material required
- 31 • Safety protocols applicable to the job
- 32 • Training requirements for individuals assigned to perform the work
- 33 • Level of management control
- 34 • Emergency contacts

35 Training records are maintained for each employee in an electronic database. The Permittees' training
36 organization maintains the training records system. A record of training, as required by Table H3, will be
37 kept in the operating record until the Washington State Department of Ecology (Ecology) approves
38 certification of final closure of the three WESF DWMUs.

Table H3. Training Matrix for Hot Cell A through Hot Cell F DWMU

Training Category ^a							
Permit Attachment 5 Training Category	General Hanford Facility Training	Contingency Plan Training	Emergency Coordinator Training	Operations Training			
WESF DWTP Implementing Plan	Orientation Program	Operations Program (Emergency Response – Contingency Plan Duties)	Emergency Coordinator	General Waste Management Duties	Awareness Program	Container Management	Miscellaneous Storage Unit Management
Job Title/Position							
Nonfacility Personnel	X						
Maintenance Crafts	X				X ^b		
Radiological Control Technician	X				X ^b		
Nuclear Chemical Operator	X	X ^b		X ^b	X ^b	X ^b	X ^b
Shift Operations Manager	X	X ^b	X ^b				
Environmental Compliance Officer	X			X ^b			
Waste Service Provider	X			X ^b		X ^b	

DWMU = dangerous waste management unit

DWTP = dangerous waste training plan

1

^a Refer to the WESF DWTP for a complete description of coursework in each training category.

^b Training received is commensurate with the duties performed. Individuals in this category who do not perform these duties are not required to receive this training.

H5.2 Records Review and Visual Inspections

As a miscellaneous unit permitted closely to a container storage area, the clean closure determination for Hot Cell A through Hot Cell F is partially based on review of the operational history and operating records, as detailed in this closure plan, to verify that all items (both debris and waste) remaining in the hot cells during stabilization and closure are identified. Based on these reviews, Hot Cells A through F is a candidate for clean closure under RCRA, and confirmation sampling will be performed. Certain documents (SD-WM-ER-014; SD-WM-ER-022; and HNF-8556, *Estimate of WESF Hot Cell Inventory*) were reviewed to identify activities performed to place Hot Cells A through F into standby/surveillance mode and identify inventory within the hot cells. Information provided in those documents was utilized to develop this closure plan. In addition to reviewing these documents, visual verification of Hot Cell F contents was performed. Contents and conditions in Hot Cells A through E cannot be visually verified due to the unavailability of lighting within the cells.

During the extended closure period for the Hot Cell A through Hot Cell F DWMU, inspections will continue to maintain the facility in a manner that prevents threats to HHE. Once initial closure activities have been completed and the extended closure period begins, annual inspections of the DWMU will be performed in accordance with Table H4. Annual inspections are deemed sufficient because any structural degradation of the DWMU, that could potentially cause a release of dangerous waste constituents to the environment, would occur slowly and can be identified at this inspection frequency.

After Hot Cells A through F have been filled with grout, the DWMUs internal monitoring equipment will be encased within the grout and will be inactive. Annual inspections identified in Table H4 will be performed visually, and no additional monitoring equipment will be used.

Penetration covers are utilized during closure activities to minimize contamination migration. Once the grout has cured, the penetration covers no longer serve a purpose; therefore, inspection is not necessary.

The DWMU is located inside a building and is not accessible for unknowing or unauthorized entry by persons or livestock. The building is protected by locked doors with posted warning signs. Vehicular access to roads leading to the DWMU area are through the Hanford Facility 24-hour controlled access points. The access points are posted with restrictive signage.

Table H4. WAC 173-303-320(2) Inspection Schedule for Hot Cell A through Hot Cell F

Requirement Description	Inspection Frequency	Inspection
Posted Warning Signs	Annually	Verify that signs are posted and legible.
Hot Cell A through Hot Cell F Exterior Surfaces and Surrounding Area	Annually	Check for structural damage to the building. Check outside the building for liquid accumulations or signs of releases of hazardous waste. Verify viewing window plates are sealed.

Inspection documentation must include, at a minimum, the date and time of inspection, observations, corrective actions (if any), and name/signature of inspection personnel. Inspection documentation must be maintained in the WESF facility operating record for a minimum of five years after Ecology clean closure acceptance. Corrective actions taken as a result of inspections must be remedied on a schedule that prevents hazards to the public health and environment.

Once the Hot Cell A through Hot Cell F DWMU has been demolished and removed, visual verification of the underlying soil will be performed to identify any staining or discolored soil, the presence of wet areas, or other signs of potential contamination. The presence of volatile emissions is unlikely; however, the potential for volatile emissions will be evaluated upon removal of the Hot Cell A through Hot Cell F

1 DWMU. Areas of concern of the underlying soil would be considered a candidate for focused sampling
2 under the SAP.

3 **H5.3 Site Preparation**

4 Site preparation will consist of installation and startup of the new K3N system. Stabilization activities
5 will be performed with the K3N system operational.

6 **H5.4 Unit Modification Prior to Stabilization**

7 Areas to be grouted include Hot Cells A through F, the Hot Cell A air lock, the underground K3 exhaust
8 ventilation system ducting, the hot pipe trench and K3 ventilation duct trench underneath the hot cells,
9 and the K3 filters and filter pit. All of these areas will be isolated from the portions of WESF that will
10 remain operational. Isolation will ensure that grout and contamination do not spread outside of the areas
11 to be grouted and will include the following activities:

- 12 • Isolate equipment that connects to the K3 exhaust system ducting.
- 13 • Isolate utility lines that remain connected to the hot cells. These utilities include air and electrical
14 services.
- 15 • Install covers over and/or seal hot cell penetrations, such as the viewing windows, manipulator
16 ports, and pass-throughs between Hot Cell F to Hot Cell G and from Hot Cell F to the service
17 gallery. Oil will be drained from the viewing windows before the covers are installed.

18 A prerequisite activity to grouting hot cells is to pour a concrete block over the lead shielding that is
19 against the north service gallery wall. Lead shielding is in place to cover a hot spot that resulted from
20 migration of cesium from Hot Cell D/E through holes in the Hot Cell D/E cell floor liner. The liner was
21 repaired in 1980. The concrete block will ensure that no grout escapes when grouting Hot Cell D/E.

22 Grout will be added to contaminated spaces through existing piping or penetrations wherever possible.
23 Where this is not possible, core drilling will be performed to provide penetrations into the spaces for the
24 addition of grout. Penetrations will need to be made through the K3 filter pit walls, into the K3 filter
25 housings, through the Hot Cell A airlock ceiling, through the top of the K3 duct trench (through the hot
26 cell divider walls above), and through the top of the hot pipe trench (through the hot cell divider wall and
27 hot manipulator shop above). Figure H13 shows the location of core drills and other grout addition
28 penetrations in the canyon that affect Hot Cells A through F.

29 Contamination control methods, such as glove-bags and portable filtered ventilators, will be used during
30 core drilling to prevent the spread of contamination. A wet core drill with a vacuum attachment, water
31 collection ring, and wastewater collection system will be used to minimize dust generated during concrete
32 core drilling.

33 An engineering evaluation has been performed to demonstrate that the addition of grout to the hot cells
34 will not affect the structural integrity of the building (CHPRC-02270).

35 **H5.5 Stabilization**

36 The primary function of stabilization is physical isolation of contamination, so no exposure pathways
37 remain where humans or the environment could be adversely impacted.

38 **H5.5.1 Grout Design**

39 For this application, grout will not perform a structural function for seismic/structural calculation
40 purposes, but it will have sufficient compressive strength to support applicable loads upon completion of
41 grouting activities.

42

1 During development of the WESF grout design, documentation related to the U Plant grouting project was
2 reviewed to identify any lessons learned that might be applicable to the WESF activity. Documents
3 reviewed included DOE/RL-2010-127, *90 percent Remedial Design Report for Grouting 221-U Plant*
4 *Canyon*, and D&D-35827, *Project Experience Report, Canyon Disposition Initiative (221-U Facility)*.

5 The grout used at WESF will be a flowable, nonaggregate void filling grout formulated to meet the
6 following performance criteria:

- 7 • Maximum allowable centerline temperature of 71°C (160°F) during curing.
- 8 • Minimum flow distance of 18 m (60 ft)
- 9 • Minimum allowable compressive strength of approximately 10,300,000 newton/m² (1,500 lb/in²)
10 at 28 days
- 11 • Capable of entering and filling openings/voids with a minimum dimension of approximately 1.3
12 cm (0.5 in.).

13 A grout testing plan will be developed as part of the QA testing program to ensure that the grout used
14 complies with project specifications. Engineering and laboratory scale testing will be performed to
15 confirm that the grout formulation meets the performance criteria prior to the addition of grout to any
16 areas within WESF. Field inspection and testing will be performed during the grouting operation.

17 The grout design process included the performance of several evaluations to determine how well the grout
18 will perform under conditions expected at WESF.

19 Radiolysis occurs when radioactive materials are in the presence of water. Hydrogen gas is generated as a
20 result of radiolysis and, if allowed to accumulate, can present a flammability/explosive hazard.
21 Evaluation has determined that the potential for an accumulation of hydrogen gas of sufficient
22 concentration and under conditions necessary to support combustion is very small.

23 Over long time periods, concrete structures may degrade as a result of sufficient exposure to ionizing
24 radiation. A very conservative calculation has been performed that shows that the time frame necessary
25 for the recognized cumulative exposure threshold associated with concrete degradation is greater than
26 110 years. A more realistic, yet still conservative, calculation shows that the time frame necessary to
27 reach a radiation exposure of concern is in excess of 590 years (CHPRC-02499, *W-130 Project*
28 *Calculation: Estimate of Impacts to Grout as a Result of Radiation Exposure*). Based on review of the
29 grouting design and hot cells, there is not a concern that there will be any degradation of grout or the hot
30 cells concrete structure due to radiation exposure.

31 Grout can also be affected by exposure to high temperature. The grout design limits temperatures due to
32 heat of hydration to 160°F, which will not negatively affect the grout or structural concrete. Potential
33 impacts to the grout as a result of heat of hydration and decay heat have been evaluated, and there are no
34 deleterious effects (CHPRC-02429, *W-130 Project Calculation: Estimate of Concrete Temperature in*
35 *WESF Hot Cells From Decay Heat*).

36 **H5.5.2 Grout Delivery**

37 Grout will be prepared offsite and trucked to WESF. The grout will be tested to verify performance
38 before construction begins. Grout samples will be collected and tested during construction.

39 A grout pump will be placed on the west side of the truck port entrance. Water will be provided from a
40 fire hydrant or building hose connection.

41 Hose will be routed from the grout pump to locations to be grouted using the following general routing:

- 42 • From the grout pump to the K3 filter pit (outside the 225B Building)
- 43 • From the grout pump, through the truck port, to the Hot Cell G air lock, and into the service
44 gallery

- 1 • From the grout pump, into the truck port, up through the floor opening into the canyon, and along
2 the canyon floor to access the hot cells and the Hot Cell A air lock. Grout will be added to the hot
3 cells through existing penetrations (ventilation inlet ports).

4 The piping and hose will remain in place for each route only as long as grout placement in the stabilized
5 areas is required.

6 A temporary washout pit will be set up near the grout pump and truck delivery location to contain rinsate
7 from the delivery trucks and grout pump.

8 A construction trailer(s) will be located near WESF to provide support for grouting activities. Electric
9 power will be required for the trailer(s) and supplemental lighting. If used, portable generators will be in
10 service for less than 365 days and will not be permitted as stationary sources. The engine used to
11 power the generator set will meet the existing reciprocating internal combustion engine standards
12 (40 CFR, Part 61, “National Emission Standards for Hazardous Air Pollutants”) for that engine size.

13 **H5.5.3 Grout Placement**

14 Grouting will begin inside the exhaust duct, downstream of the K3 filter pit, and inside the two HEPA
15 filter units, to stop any contamination from escaping through the exhaust system during
16 subsequent grouting.

17 The following general sequence is used for stabilization grouting of the Hot Cell A through Hot Cell F
18 DWMU:

- 19 • K3 filter pit (not part of TSD)
- 20 • K3 duct (not part of TSD)
- 21 • Hot Cell A air lock (not part of TSD)
- 22 • Hot pipe trench (not part of TSD)
- 23 • K3 duct trench (not part of TSD)
- 24 • Hot cells

25 The sequence provided is a general sequence only. The hot cells will be partially filled to provide
26 shielding for the core drilling, which will allow access to the K3 duct trench, and complete the hot pipe
27 trench grout addition. The Hot Cell A air lock does not need to be completely grouted before hot cell
28 grouting starts. The exact sequence will be determined during the final work planning process and
29 documented in the work package that is used to perform the work.

30 To minimize cracking of the grout, the lift depth will be limited to approximately 0.9 m (3 ft).
31 This limitation will also allow placement of the next lift the following day.

32 Grout will be distributed from the grout pump set up outside the truck port to the vicinity of the grout fill
33 location. Valves will be used at the fill connections to enable quick shutoff of grout once the volume
34 is filled.

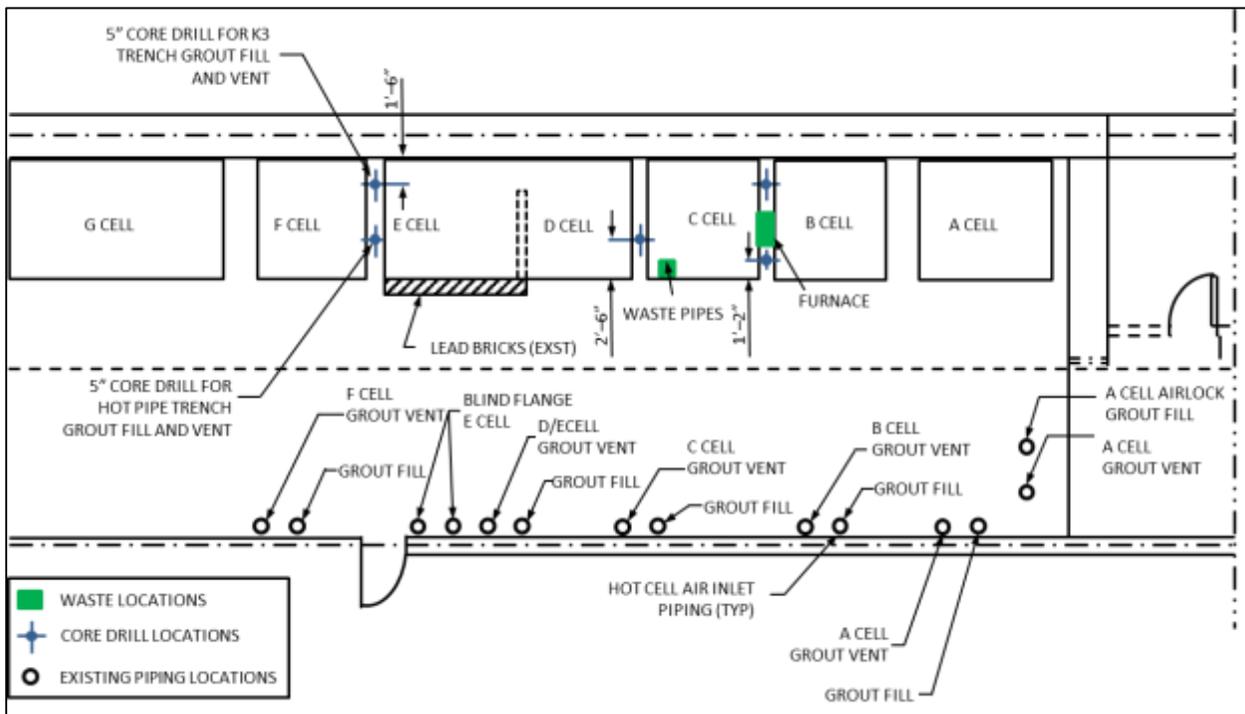
35 As grout flows into placement locations, air will be displaced by the grout. Displaced air will contain
36 water vapor and will be radioactively contaminated. Portable ventilation systems, which consist of a
37 HEPA filter, heater, and fan, will be used to collect and filter the displaced air. Portable ventilation
38 systems used to support grouting of the hot cells, hot pipe trench, K3 duct trench, and A Cell airlock will
39 discharge inside the 225B Building, which is an abated air space. Portable ventilation systems used to
40 support grouting of the K3 filter pit will discharge outside, and abatement and monitoring controls will be
41 implemented. This activity will be licensed separately if the existing site license cannot be used.

1 Expected grout volume will be used as an initial indicator to determine when grouting is complete.
 2 Design of the grout addition system will include provisions for visual confirmation that the spaces being
 3 grouted are filled as much as possible.

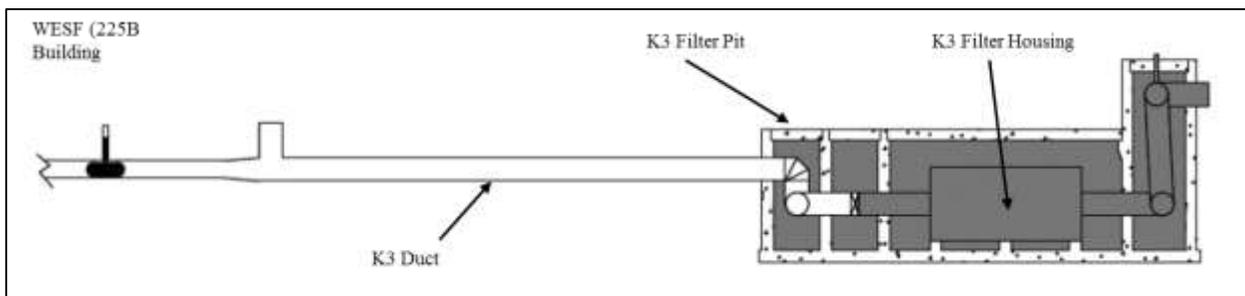
4 **H5.5.4 K3 Filter Pit and Filter Housings**

5 K3 filter housings (Figure H14) are located in an underground vault that consists of several chambers.
 6 All chambers of the underground vault and filter housings will be filled with grout. Estimated grout
 7 volume is 132 m³ (173 yd³).

8 Core drills will be made into each chamber of the filter pit and the filter housings to allow placement of
 9 grout. Contamination control methods, such as the use of glovebags and portable ventilators, will be used
 10 to prevent the spread of contamination during drilling and grouting.



11 **Figure H13 Core Drills and Grout Addition Locations in Canyon**



12 **Figure H14. K3 Filter Pit and Duct**

13 **H5.5.5 K3 Duct and Trench**

14 The K3 duct extends from the K3 filter pit to the 225B Building. It is located inside a trench and runs
 15 underneath the hot cells. Both the K3 duct and K3 duct trench will be filled with grout. The estimated
 16 grout volume is 11 m³ (14 yd³) for the duct and 13 m³ (17 yd³) for the K3 duct trench.
 17
 18

1 Grout will be added to the K3 duct through access points in the truck port and in Hot Cell G. Access to
2 the K3 duct trench will be via core drills through the divider walls between Hot Cells B and C and
3 between Hot Cells E and F. These divider walls are approximately 50 cm (20 in.) wide and
4 approximately 4.9 m (16 ft) deep. Figure H15 shows how core drills through the divider walls will be
5 performed. Grout will be added through these penetrations until the K3 duct trench is full.

6 **H5.5.6 Hot Pipe Trench**

7 The hot pipe trench runs underneath the hot cells next to the K3 duct trench. The entire hot pipe trench
8 will be filled with grout. Access to the hot pipe trench will be via core drills through the floor of the hot
9 manipulator shop and through the divider walls between Hot Cells B and C, between Hot Cells C and D,
10 and between Hot Cells E and F (see Section H5.4 for core drill locations).

11 Grout will first be added to the hot pipe trench through a penetration made in the floor of the hot
12 manipulator shop (not shown in Figure H13). Grout will then be added through the Hot Cell B and Hot
13 Cell C divider wall penetrations, and finally through the Hot Cell E and Hot Cell F divider wall
14 penetrations until the hot pipe trench is full. Penetration through the Hot Cell C and Hot Cell D divider
15 wall will be used for venting. The core drill locations were chosen to avoid drilling through obstructions,
16 such as the furnace between Hot Cells B and C.

17 Due to congested conditions in the hot pipe trench with piping and supports, grout pump discharge
18 pressure will be the indication of complete filling since volume calculations will be inaccurate.

19 The estimated grout volume for the hot pipe trench is 28 m³ (36 yd³).

20 **H5.5.7 Hot Cell A Air Lock**

21 The Hot Cell A air lock will be grouted to stabilize contamination within the air lock and to prevent the
22 Hot Cell A access door from opening when Hot Cell A is grouted. The air lock must receive at least one
23 lift of grout before Hot Cell A stabilization can proceed.

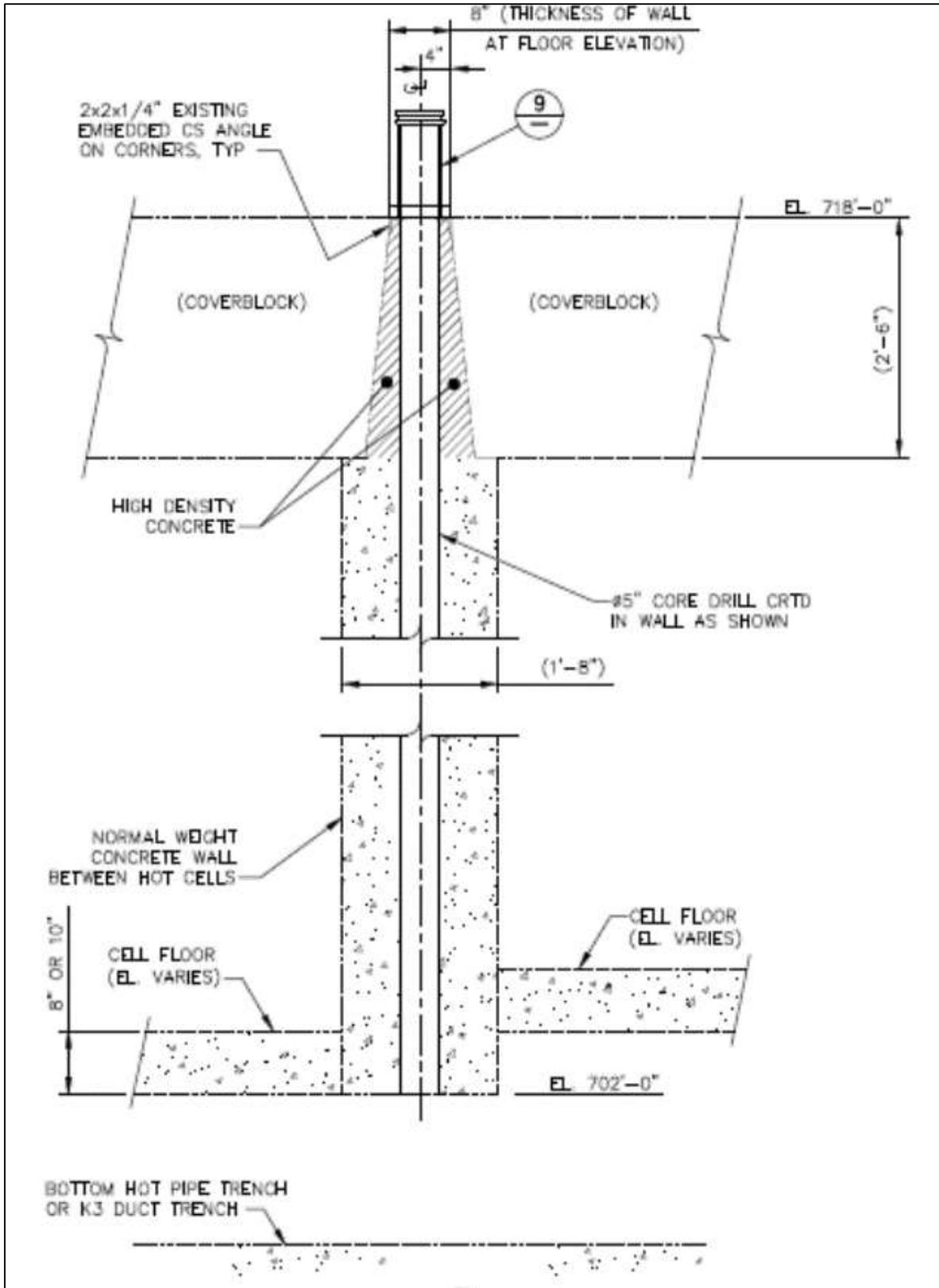
24 Grout will be added to the Hot Cell A air lock through ceiling penetrations made by core drilling through
25 the canyon floor (canyon is directly above the air lock). Estimated grout volume is 50 m³ (66 yd³).

26 **H5.5.8 Hot Cells**

27 Grout will be added to Hot Cells A through F to the underside of the cover blocks. The hot cells will be
28 filled and actively vented during the grouting process using existing ventilation inlet ports.

29 Each hot cell has a viewing window on the operating gallery side that must be protected to ensure that
30 there is no breach by liquid grout during the placement process. Protection of the windows is addressed in
31 Section H5.5.9.

32 Numerous penetrations through the hot cell walls into the operating gallery and service gallery must be
33 sealed to prevent leakage of contaminated grout. A combination of cover plates and mastic material will
34 be employed for this purpose. Pass-throughs from Hot Cell F to Hot Cell G and Hot Cell F to the service
35 gallery will be sealed from Hot Cell G and the service gallery sides to contain the grout.



1
2

Figure H15. Performance of Core Drills through Divider Wall

1 Hot cell grouting will be performed in multiple lifts. Sequencing of hot cell stabilization will be finalized
 2 with the grouting contractor. Each cell could have a lift placed in turn, or one cell can be filled before
 3 moving on to the adjacent one. Because of the flowability of the grout and because no effort is made to
 4 seal the hot cells from each other, it is likely that all cells will fill together until the grout level is above
 5 the highest common penetration. Estimated grout volumes are listed in Table H5.

Table H5. Estimated Hot Cell Grout Volume

Hot Cell	Total Grout Volume (yd ³)
A	47
B	28
C	28
D and E	62
F	28

6 Hot cells contain the following tanks, piping, and other equipment:

- 7 • Process tanks within the hot cells are connected to the floors, walls, and/or connecting piping and
 8 are not expected to be buoyant. Tank drain and vent valves were left open during hot cell
 9 cleanout and the grout formula being used is thin, so grout is expected to enter and fill most of the
 10 tanks and other equipment left in the hot cells.
- 11 • HEPA filters in the ventilation exhaust and between Hot Cell A and the A Cell Hood are expected
 12 to fail, so grout will enter all of these spaces.
- 13 • Four trays of waste will remain in the furnace between Hot Cells B and C. The furnace has small
 14 penetrations, which will remain open during grouting and allow some grout to flow inside.
 15 However, macroencapsulation will be accomplished by grout surrounding and encapsulating the
 16 furnace. Although grout may not completely fill the furnace to encapsulate the trays directly, it
 17 will completely encapsulate the furnace containing the trays, so the statutory requirement of
 18 42 USC 6924(m), “The Public Health and Welfare,” “Standards Applicable to Owners and
 19 Operators of Hazardous Waste Treatment, Storage, and Disposal Facilities,” will be met through
 20 substantial reduction of the migration potential of hazardous constituents from the waste.
- 21 • No effort will be made to seal pass-throughs between the hot cells, so grout should be forced into
 22 those spaces.
- 23 • Gaskets on the hot cell side of the window may or may not fail. If they fail, allowing grout to
 24 flow into the spaces around the window, between the window panes, then the seal installed on the
 25 operating gallery side of the window will contain the grout.
- 26 • Although not expected, items that are not attached to the floor or walls of the hot cells may
 27 become buoyant during grouting of the hot cells. These items included HEPA filters, open-top
 28 rectangular tanks in Hot Cell F, and miscellaneous loose items within the hot cells.

29 The approach to grout placement will be to add grout in lifts. The first lift of grout will flow around all
 30 fixed objects. This first lift will be allowed sufficient time to harden before placing the next lift. Any
 31 objects that float up with the grout will be bonded in the top surface, depending on displacement of the
 32 object. Tanks will have enough surface area in contact with the grout to develop a bond that will keep
 33 them in place when the next lift is placed. Hoses and HEPA filters will be bonded to the first lift because
 34 of their large surface area and light weight.

35 H5.5.9 Hot Cell Viewing Window Protection

36 Each hot cell has a viewing window consisting of multiple sections of glass (tempered and leaded)
 37 separated by inner sections of oil to provide operator shielding. The total volume of oil between the panes

1 of glass in each window is approximately 30 L (8 gal). The gap remaining after the oil is removed is
2 approximately 0.64 cm (0.25 in.) between each pane. Removal of the oil is performed through the work
3 package process, which includes the use of a waste planning process before work is performed. Once the
4 oil is removed, it will be managed as identified in Section H3.4.6. Oil removal from the viewing window
5 is performed using the following steps:

- 6 • Attach oil filling tubing to a plastic bottle.
- 7 • Open the oil inlet line to drain oil from the window into the preapproved container.

8 A steel plate will be attached to the outside of the shield wall in the operating gallery that covers the entire
9 viewing window. It will extend far enough to use concrete anchors to hold it in place. A seal will be used
10 between the plate and wall to ensure that contaminated grout will not breach the windows.

11 The grout lift heights inside each hot cell will be adjusted to ensure that the upper elevation of the grout
12 lift occurs near the top of the window to reduce hydrostatic pressure on the window.

13 **H5.5.10 Control of Contamination during Grouting**

14 As the grout flows into placement locations, air, water vapor, and radiological contaminants may be
15 released through the vent locations. Radiological contamination will be controlled by active ventilation
16 with portable exhausters at specified locations. Active ventilation will allow air movement to be
17 controlled throughout all phases of the project.

18 **H5.6 Demolition of the Hot Cell A through Hot Cell F DWMU**

19 Demolition of the Hot Cell A through Hot Cell F DWMU will take place concurrently with demolition of
20 the remaining portions of WESF. The following primary activities are required to complete demolition of
21 the Hot Cell A through Hot Cell F DWMU:

- 22 • Location of utilities
- 23 • Equipment mobilization
- 24 • Demolition and removal of Hot Cell A through Hot Cell F

25 **H5.6.1 Location of Utilities**

26 Prior to demolition, any in-use utilities will be located as well as the underground fire water line. The fire
27 water line supplies water to the fire hydrant, which will be utilized as the water supply for dust
28 suppression during demolition activities.

29 **H5.6.2 Equipment Mobilization**

30 Resources, equipment, and materials (e.g., support trailers, excavators, diamond saw cutters, front
31 loaders, trailers, sand, water fog cannons, and boring machinery) necessary to perform demolition will be
32 staged in designated laydown areas in proximity to WESF.

33 **H5.6.3 Demolition and Removal of Hot Cell A through Hot Cell F**

34 Demolition of the Hot Cell A through Hot Cell F DWMU will be accomplished utilizing cutting and
35 sawing to create monoliths. Water may be used to control dust generated from demolition activities. The
36 amount of water used will be minimized to prevent ponding and runoff. While unlikely, other controls
37 such as portable ventilation filter units, HEPA filtered vacuum cleaners, greenhouses, and/or fogging
38 agents may be used. Additional storm water run-on and run-off controls may be implemented, as needed.

39 If needed, crusting agents or fixatives will be applied to any disturbed portion of the contamination area,
40 such as exposed soil from the removal of monoliths that will be inactive for more than 24 hours. Material
41 to be disposed at the Environmental Restoration Disposal Facility (ERDF) will also comply with the
42 moisture content and other applicable requirements of WCH-191, *Environmental Restoration Disposal*

1 *Facility Waste Acceptance Criteria.* Dust fixative is applied to appropriate portions of the demolition and
2 excavation site at the end of each shift, and if wind arises, to prevent the spread of contamination.

3 Demolition activities described in the following subsections presume that the waste will be disposed of at
4 ERDF, as discussed in Section H5.9.4.

5 **H5.6.3.1 Cutting and Sawing**

6 Demolition using cutting or diamond wire sawing will be used to create multiple monoliths. Grouting the
7 hot cells stabilizes contamination on the surfaces of the hot cells, waste boats and pipes, and exterior of
8 remaining equipment and debris. To avoid disturbance of the potential surface contamination on the hot
9 cell surfaces, diamond wire sawing will be performed through the walls between the cells, with the
10 exception of the wall between Hot Cells B and C, which contains the boats inside the furnace. Cuts will
11 be made to include the exterior walls of the hot cells. A general depiction of the specific cut locations is
12 identified in [Figure H16](#). Final cut locations will be determined, through the use of engineering drawings
13 and field walkdowns, before the start of demolition.

14 The exact locations of HEPA filters and other debris on the cell floors are not known. Monolith cuts are
15 designed to take advantage of wall structural integrity for building the exoskeleton and to ensure that
16 remaining tanks are cut, so they are no longer a closed vessel for disposal. Due to the location of TK-B-4
17 in the wall directly above the furnace, after the monolith containing TK-B-4 and the furnace has been
18 removed, a horizontal cut will be made into the tank so it is no longer a closed vessel; however, the
19 monolith will remain whole. The horizontal cut location is depicted in [Figure H16](#). Care will be taken to
20 avoid breaching the furnace below the tank. If a cut to create a monolith breaches HEPA filters or other
21 debris, the exposed surfaces of debris along the cut line of the monolith will be sealed in accordance with
22 [40 CFR Part 268.45](#), “Land Disposal Restrictions,” “Treatment Standards for Hazardous Debris”
23 (Table 1, “Alternative Treatment Standards for Hazardous Debris”).

24 Sealing is performed by the application of an approved sealing material such as epoxy, silicone, or
25 urethane compounds that must adhere tightly to the debris surface to avoid exposure of the surface to
26 potential leaching media. Sealants must be resistant to degradation by the debris and its contaminants.

27 During cutting and sawing activities, water is used to cool blades and wires. This water is collected using
28 a vacuum system and reused during the demolition. After cutting and sawing activities are complete, the
29 water is containerized, solidified, and managed as a newly generated waste stream (Section H5.9). Due to
30 the size of the monoliths and the softness of the grout, an exoskeleton may need to be fabricated to
31 support the structure of the monolith. The exoskeleton is made from steel plates bolted to the outside
32 surfaces of the monolith. Once the steel plates are bolted to the surfaces, steel beams are welded to the
33 plates. Depending on the weight of the monolith, it may be necessary to bore under the monolith and
34 install steel beams to support the structural integrity of the monolith from below. Once the exoskeleton is
35 in place, the monolith may be removed with a crane and lifted to the transportation trailer. The other
36 option for removal of the monolith is by using jacks to lift the monolith and then drive the trailer
37 underneath the monolith. Monoliths will then be removed and managed as hazardous debris
38 (Section H5.9.4).

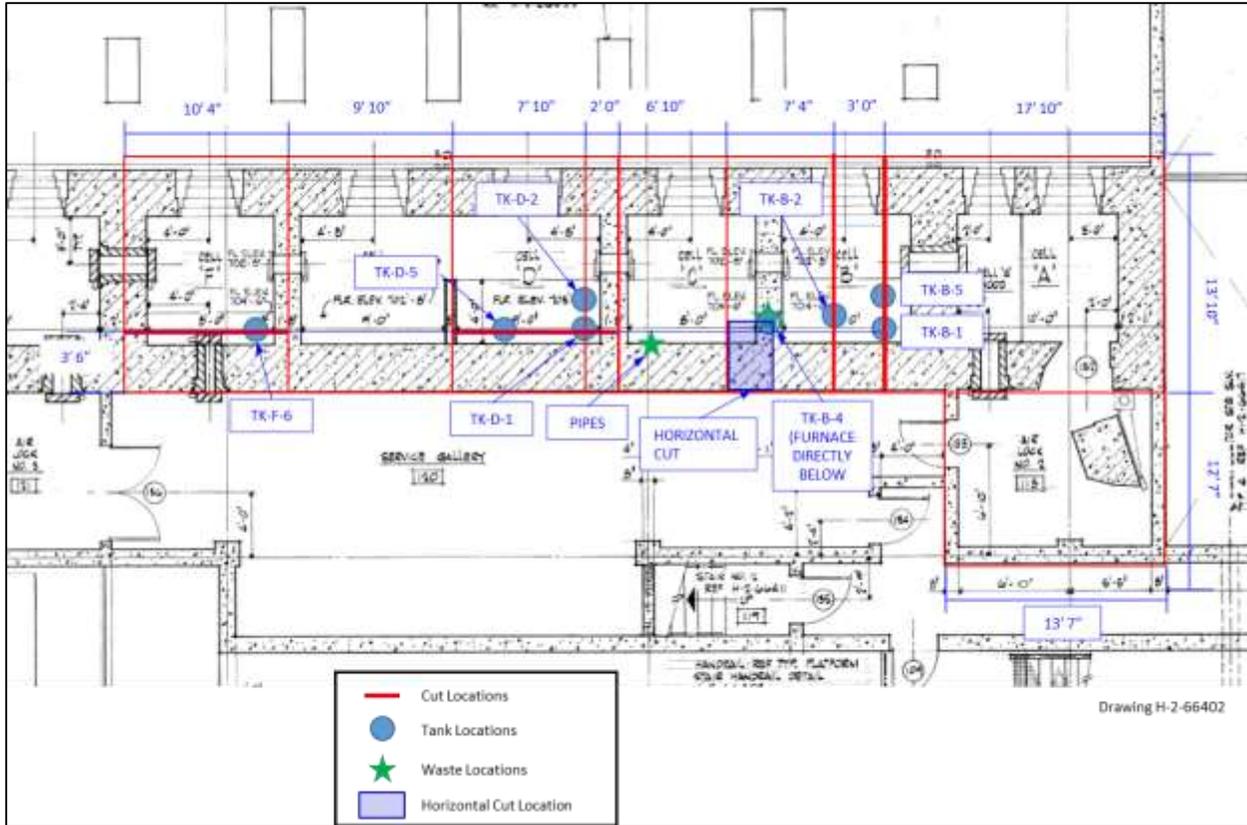


Figure H16. Monolith Cut Locations

H5.7 Removal of Wastes and Waste Residues

Hot Cells A through F contain materials and equipment used during packaging of the cesium and strontium capsules (see Section H3.4 for details of cell contents). In preparation for facility layup, a series of demineralized water flushes was performed in all of the in-cell jumpers and tanks. Chemical flushing was done in an effort to remove residual solids, and the tanks were again flushed with demineralized water.

The tank systems were flushed, removing all waste possible with normal means, with the intention of closing them and never reusing. During demolition of the Hot Cell A through Hot Cell F DWMU, locations of the monoliths have been placed to ensure that intact tanks, listed in [Table H1](#), will be cut (and therefore no longer intact) and conservatively disposed of as hazardous debris. Cut locations for the tanks are shown in [Figure H16](#).

Radiation hazards posed to personnel prevent the sampling and removal of cell contents; therefore, sampling will not be performed to quantify dangerous waste contamination. As a result, material and equipment remaining in the hot cells will be conservatively designated as hazardous debris.

Following facility layup, jumpers were removed from the tanks resulting in tank openings for grout filling.

The Hot Cell B furnace contains four trays with approximately 0.6 kg (1.3 lb) of strontium fluoride floor sweepings. Hot Cell C contains two threaded and capped pipes with approximately 1.2 kg (2.6 lb) of strontium fluoride floor sweepings. The pipes are located on the southwest corner of the cell on wall brackets above the bench floor. Waste in the trays and pipes has been in storage since the hot cells were placed in surveillance and maintenance mode. These containers are subject to the dangerous waste regulations and must meet closure performance standards.

1 DOE-RL has submitted a petition to Ecology for a site-specific variance from applicable land disposal
2 restriction (LDR) treatment standards in accordance with 40 CFR 268.44(h)(2), "Variance from a
3 Treatment Standard," for specific waste items in Hot Cells B and C at WESF. These waste items hold
4 0.6 kg (1.3 lb) and 1.2 kg (2.6 lb) of floor sweepings from past cleanup activities in the cells. The floor
5 sweepings contain strontium fluoride and processing debris, including metal shavings, and other
6 miscellaneous waste material produced during operations of the hot cells. Ordinarily, the treatment
7 standard for these forms of waste is a specific type of stabilization called microencapsulation.
8 Microencapsulation is the stabilization of the waste material itself through the addition of Portland cement
9 or lime/pozzolanic material, which reduces the leachability of contaminants from the waste.
10 Microencapsulation treatment of the waste would then be followed by sampling and analysis of the
11 stabilized waste to determine that LDR treatment standards have been accomplished.

12 However, treatment by microencapsulation would require intrusive activities, increasing exposure to
13 workers, generation of a significant amount of additional waste requiring treatment, and potential risk of
14 environmental exposure. Radiological and physical characteristics of the waste items prevent them from
15 undergoing final analytical testing to verify that LDR treatment standards have been achieved. Treatment
16 and verification of treatment by the usual methods of microencapsulation would cause potential exposure
17 to workers, provide potential for environmental exposure, and fail to demonstrate LDR treatment.

18 A variance from the required LDR treatment standards is being requested to allow stabilization via in-cell
19 macroencapsulation during grouting of the hot cells. Macroencapsulation is the application of a surface
20 coating material such as polymeric organics (e.g., resins and plastics) or inert inorganic materials
21 (e.g., Portland cement) that would encase the entire waste items rather than treat the interior waste such as
22 in microencapsulation, substantially reducing surface exposure to potential leaching of contaminants.
23 Portland cement would be used to encase the entire waste items within the cell. Macroencapsulated waste
24 would be left intact at the WESF facility during an initial closure period. By treating the waste via
25 macroencapsulation in WESF cells, leachability of contaminants is reduced, radiological exposure to
26 workers is minimized, and transportation to another facility is not required. The requested petition
27 (15-AMRP-0070, "Petition for Site-Specific Variance from Land Disposal Treatment Standards")
28 outlines the justification and protectiveness of this treatment for waste items at the WESF hot cells.

29 During final facility removal, stabilized waste and waste residues associated with the Hot Cells A through
30 Hot Cell F DWMU will be removed and managed as newly generated hazardous debris. Grouted Hot
31 Cells A through F can be removed using standard demolition equipment, such as a diamond wire saw and
32 excavators, cranes, and trailers in large monoliths, and transported for disposal in an approved disposal
33 facility. Treatment standards for the newly generated hazardous debris will be the alternative debris
34 standards for hazardous debris (40 CFR 268.45, Table 1) incorporated into WAC 173-303-140, "Land
35 Disposal Restrictions," by reference. Additional detail on the newly generated waste is covered in
36 Section H5.9.

37 Cesium and strontium salts have been analyzed to estimate impurities. The analysis performed identified
38 possible dangerous waste designations of barium (D005), cadmium (D006), chromium (D007), lead
39 (D008), and silver (D011). These analytical data were used to characterize the salts and will be used to
40 identify constituents of concern for the four trays and two pipes containing floor sweeping. Tables H6
41 through H8 provide analytical data for the cesium and strontium salts.

42 Impurities in the cesium salt are estimated as listed in PNL-5170, *A Review of Safety Issues that Pertain*
43 *to the Use of WESF Cesium Chloride Capsules in an Irradiator*. Table H6 data were taken on cesium
44 feed solution and salt analyzed for corrosion analysis. Concentrations are listed as weight percent solids.
45 The silver concentration was not estimated but was added from process knowledge; therefore, it is not
46 listed in the following tables.

Table H6. Impurities in Cesium Feed Solution and Salt

Element	Cesium Feed Solution (Wt%)	Salt Analysis (Wt%)
Aluminum (Al)	1.7	0.14
Boron (B)	--	0.14
Barium (Ba)	0.94	0.55
Calcium (Ca)	1.0	--
Cadmium (Cd)	--	0.02
Cobalt (Co)	--	0.1
Chromium (Cr)	0.27	1.4
Iron (Fe)	0.38	--
Potassium (K)	0.79	0.68
Magnesium (Mg)	0.25	0.68
Sodium (Na)	0.70	2.8
Nickel (Ni)	0.33	0.1
Lead (Pb)	1.4	0.14
Rubidium (Rb)	0.52	--
Silicon (Si)	7	0.21
Strontium (Sr)	0.18	0.02
Titanium (Ti)	--	0.02
Zinc (Zn)	--	0.03

- 1 Impurities in cesium salts wasted at the DOE Oak Ridge Site are listed in HNF-2928, *Certification That*
2 *CsCl Powder and Pellet Materials Meet WESF Acceptance Criteria*. Concentrations are listed in
3 Table H7 by weight percent.
- 4 Encapsulated cesium chloride salt contains dangerous waste chemical impurities from the fractionation
5 process consisting of lead, barium, chromium, cadmium, and silver. Barium is generated continuously as
6 a result of the cesium-137 decay chain.
- 7 Impurities in strontium salt are estimated in BNWL-1967, *The Containment of ⁹⁰SrF₂ at 800°C to 1100°C*
8 *Preliminary Results*. Table H8 data are estimates based on process flowsheet information; concentrations
9 are listed in weight percent.
- 10 The encapsulated strontium fluoride salt contains dangerous waste chemical impurities from the
11 fractionation process consisting of barium, lead, cadmium, chromium, and silver.
- 12

Table H7. Impurities in Cesium Salts Wasted at Oak Ridge

Element	Wt%
Aluminum (Al)	0.68
Boron (B)	5.17
Barium (Ba)	2.98
Calcium (Ca)	0.68
Copper (Cu)	0.02
Iron (Fe)	0.04
Potassium (K)	1.21
Magnesium (Mg)	0.04
Molybdenum (Mo)	0.009
Sodium (Na)	7.76
Nickel (Ni)	0.01
Silicon (Si)	2.59
Strontium (Sr)	0.01
Zinc (Zn)	0.03

1

Table H8. Impurities in Strontium Salt

Element	Probable Concentration (Wt%)
Aluminum (Al)	<0.5
Barium (Ba)	0.1-2.0
Calcium (Ca)	<0.1
Cadmium (Cd)	<0.2
Chromium (Cr)	<0.1
Copper (Cu)	<0.1
Iron (Fe)	<0.01
Hydrogen (H)	<0.1
Potassium (K)	0.05-0.5
Magnesium (Mg)	<0.1
Manganese (Mn)	<0.01
Nitrogen (N)	1-4
Sodium (Na)	<0.1
Nickel (Ni)	<0.05
Lead (Pb)	<0.2
R (as in Rare Earths)	<2.0
Silicon (Si)	<0.02

H5.8 Removal of Unit, Parts, Equipment, Piping, Containment Structure, and Other Ancillary Equipment

In general, equipment will not be removed from Hot Cells A through F. The hot cells contain tanks and equipment that were used during the encapsulation process (Table H1). Process and service piping is embedded in the concrete walls of each hot cell. Pipes connect the cells to each other, as well as to the hot pipe trench, transmitter rooms, AMU area, service gallery, operating gallery, manipulator repair shop, truck port, and Tank-100. Spare piping is provided between all areas and the hot cells. All tanks, equipment, and piping will remain in place.

Upon completion of the surveillance and maintenance mode in 1985, hot cell components not required for storing the capsules or managing the legacy contamination were shutdown. Shutdown involved equipment cleanout, equipment isolation or removal, jumper removal, nozzle blanking, cerium window refurbishment, and instrumentation deactivation.

Water sources to Hot Cells A through F have been isolated, and the manipulators have been removed from Hot Cell A through Hot Cell E. Manipulators will be removed from Hot Cell F prior to grouting. Remaining utility connections, including air piping and electrical connections, will be isolated from the hot cells prior to stabilization.

Section H5.4 provides further discussion of hot cell and K3 exhaust duct isolation activities that will be performed prior to stabilization.

H5.9 Identifying and Managing Waste Generated During Closure

Closure activities for WESF will result in the generation of three waste streams requiring management and disposal: excess grout generated during grouting activities, water collected from sawing and cutting, and hazardous debris resulting from demolition during final closure activities of the Hot Cell A through Hot Cell F DWMU.

H5.9.1 Excess Grout

Grout that does not meet specification requirements (Section H5.5.1), and grout remaining in a delivery truck when a particular grouting operation is completed, will most likely be generated during closure activities. This out-of-specification or excess grout (Section H5.5.1) is anticipated to be a nondangerous solid waste stream and will be managed and disposed at an approved disposal site as newly generated nondangerous waste.

H5.9.2 Grout Rinsate

A temporary washout pit will be set up near the grout pump and truck delivery location to contain rinsate from the delivery trucks and grout pump. The resulting grout rinsate wastewater stream is exempt per Ecology, 2012, *Categorical State Waste Discharge Permit Number ST0004511*, under exemption G12.F. The resulting rinsate wastewater is anticipated to be nondangerous.

H5.9.3 Water Collected from Sawing and Cutting

Water used to cool the blades and cutting wires will be collected using a vacuum system and reused throughout the cutting process. Once demolition activities are complete, the water will be containerized. The waste is anticipated to be nondangerous and is considered a newly generated solid waste stream. Until confirmation of the nondangerous waste designation, waste must be handled in accordance with all applicable requirements of WAC 173-303-170, "Requirements for Generators of Dangerous Waste," through WAC 173-303-230, "Special Conditions." The waste will be labeled, characterized in accordance with requirements in WAC 173-303-070, "Designation of Dangerous Waste," anticipated to be designated as nondangerous waste, stored, and transported to an appropriate disposal facility.

1 **H5.9.4 Hazardous Debris**

2 Hazardous debris generated from demolition will be packaged onsite at WESF and transported to ERDF.
3 Hazardous debris includes, but is not limited to, the following types of wastes resulting from demolition
4 of Hot Cells A through F:

- 5 • Concrete and associated debris
- 6 • Miscellaneous waste (e.g., rubber, glass, paper, PPE, cloth, plastic, and metal)
- 7 • Equipment and construction materials

8 The preferred management of hazardous debris resulting from demolition of the hot cells is in bulk form.
9 Bulk waste will include monoliths and other debris. Monoliths will be loaded onto trailers for
10 transportation to ERDF. Other miscellaneous bulk debris will be placed into bulk containers, such as
11 roll-off boxes, for ERDF disposal. These transport trailers and bulk containers will be stored/staged in a
12 suitable area in proximity to the hot cell area or may be staged for up to 90 days in another suitable
13 location. Waste must be handled in accordance with all applicable requirements of WAC 173-303-170
14 through WAC 173-303-230, labeled, characterized in accordance with WAC 173-303-070 requirements,
15 stored, and transported to an appropriate disposal facility. Bulk containers will be covered when waste is
16 not being added or removed. Lightweight material (e.g., plastic and paper) will be bagged, if appropriate,
17 prior to placement in the bulk container, to eliminate the potential for materials blowing out of the bulk
18 container or truck.

19 **H5.10 Identifying and Managing Contaminated Environmental Media**

20 If contaminated environmental media (soil) is identified as a result of clean closure verification sampling
21 activities (i.e., samples indicate contamination above clean closure standards), the nature and extent of
22 contamination will be evaluated. Soil surrounding the sampling node location, which indicated
23 contamination above clean closure levels, will be removed horizontally to the next adjacent node
24 locations where contamination was not identified and to a depth of approximately 3 ft. (0.6 m).
25 Contaminated soil will be removed using equipment capable of removing the quantity of material
26 required to complete removal and clean close the DWMU. Following removal of contaminated soil,
27 additional confirmatory sampling efforts will be conducted in accordance with the approved closure plan
28 SAP (Section H5.12.1), at the same node location(s) where contamination was identified, to demonstrate
29 clean closure levels.

30 If contaminated soil removal is required from the DWMU, it will be managed as a newly generated waste
31 stream in accordance with WAC 173-303-610(5). Contaminated soil generated during the closure period
32 must be properly disposed. The contaminated soil must be handled in accordance with all applicable
33 requirements of WAC 173-303-170 through WAC 173-303-230, containerized, labeled, characterized in
34 accordance with WAC 173-303-070 requirements, designated as a dangerous or nondangerous waste,
35 stored, and transported to an appropriate disposal facility. It will be treated (if necessary) to meet LDRs
36 in 40 CFR 268, incorporated into WAC 173-303-140(2)(a) by reference, then ultimately disposed.
37 While undergoing final activities to clean close the WESF Operating Unit Group, the Permittees will
38 provide a more detailed evaluation of how contaminated environmental media will be managed in
39 accordance with Ecology clean closure guidance.

40 **H5.11 Confirming Clean Closure**

41 Final clean closure activities for the Hot Cell A through Hot Cell F DWMU will be performed in
42 conjunction with removal of the entire WESF facility. Final clean closure will be accomplished through
43 demolition practices (Section H5.6), to remove Hot Cells A through F, along with the remainder of
44 WESF. Demolition of the remaining two DWMUs within WESF is to be detailed in the closure plans for
45 those two DWMUs.

1 Once the removal of WESF is complete, confirmation sampling of soil underlying the Hot Cell A through
2 Hot Cell F DWMU will be conducted in accordance with the SAP, detailed in Section H5.12, to confirm
3 that soil unrestricted use cleanup standards (MTCA [WAC 173-340] Method B) have been achieved. If
4 sample results indicate contamination above clean closure levels, contaminated soil will be removed and
5 managed in accordance with Section H5.10. Once analytical results confirm clean closure levels of the
6 target analytes, clean closure certification will be prepared in accordance with Section H5.14.

7 **H5.11.1 Hot Cell A through Hot Cell F Closure Process**

8 Following completion of the initial closure activities described in this plan, the Hot Cell A through Hot
9 Cell F DWMU will be in an extended closure period until final closure activities can take place
10 (Section H6). Final closure activities for the Hot Cell A through Hot Cell F DWMU will be coordinated
11 with final closure of the pool cell and Hot Cell G DWMUs. Final closure activities will occur after the
12 cesium and strontium capsules have been removed from WESF.

13 When final closure activities for the Hot Cells A through Hot Cell F DWMU are ready to start,
14 mobilization will begin to remove the grouted hot cells (Section H5.6.2). Disassembly of the hot cells is
15 planned and will be performed with the following considerations:

- 16 • Hot cells will be cut into monoliths small enough to be safely transported using available means.
- 17 • Demolition of the hot cells is planned to avoid cutting through the Hot Cell B/Hot Cell C waste
18 storage locations.
- 19 • Contamination control methods will be employed to avoid the spread of radiological
20 contamination or mixed wastes to the environment.

21 A list of drawings showing the hot cell configuration will be maintained in the operating record to assist
22 in identifying appropriate cut locations.

23 **H5.12 Sampling and Analysis Plan and Constituents to be Analyzed**

24 The SAP summarizes the sampling design used and associated assumptions based on the knowledge of
25 the Hot Cell A through Hot Cell F DWMU. The sampling design includes input parameters that will be
26 used to determine the number and location of samples once demolition of WESF is complete.

27 Sampling of the underlying soil for Hot Cells A through F will be conducted to confirm that soil
28 unrestricted use cleanup standards (MTCA [WAC 173-340] Method B) have been achieved. If sample
29 results indicate contamination above clean closure levels, the contaminated soil will be removed and
30 managed in accordance with Section H5.10.

31 Due to the legacy radiological contamination within the hot cells, personnel entrance into the hot cells is
32 not feasible. Therefore, sampling of the remaining equipment, classified as hazardous debris, and the four
33 trays and two pipes, to demonstrate compliance with the concentration based treatment standard in
34 40 CFR 268.40, “Applicability of Treatment Standards,” will not be performed under the closure
35 activities outlined in this closure plan. The treatability variance (15-AMRP-0070) establishes the
36 alternative performance based treatment standard of macroencapsulation, as identified in 40 CFR 268.45.

37 **H5.12.1 Sampling and Analysis Plan**

38 Sampling and analysis of the Hot Cell A through Hot Cell F DWMU underlying soil will be conducted to
39 confirm that clean closure levels have been achieved. All sampling and analysis will be performed in
40 accordance with the sampling and quality standards established in this closure SAP. The closure SAP
41 details sampling and analysis procedures in accordance with SW-846, *Test Methods for Evaluating Solid
42 Waste: Physical/Chemical Methods, Third Edition; Final Update IV-B*; ASTM International (formerly
43 American Society for Testing and Materials) *Annual Book of ASTM Standards*; and applicable U.S.
44 Environmental Protection Agency (EPA) and Ecology guidance. Sampling and analysis activities will
45 meet applicable requirements of SW-846, ASTM International standards, EPA approved methods, and

1 DOE/RL-96-68, *Hanford Analytical Services Quality Assurance Requirements Document (HASQARD)*,
 2 at the time of closure. This SAP was also developed using Ecology Publication 94-111, *Guidance for*
 3 *Clean Closure of Dangerous Waste Units and Facilities*, Section 7.0, “Sampling and Analysis for Clean
 4 Closure,” and EPA/240/R-02/005, *Guidance on Choosing a Sampling Design for Environmental Data*
 5 *Collection* (EPA QA/G-5S).

6 **H5.12.2 Target Analytes**

7 Analysis of cesium/strontium salts identified possible dangerous waste designations of barium (D005),
 8 cadmium (D006), chromium (D007), lead (D008), and silver (D011). Section H5.7 provides analytical
 9 data of cesium/strontium salts. Table H9 details the target analytes and associated waste codes.

Table H9. Target Analyte List

Target Analyte (Waste Code)	Chemical Abstracts Service Number
Barium (D005)	7440-39-3
Cadmium (D006)	7440-43-9
Chromium (Hexavalent) (D007)	18540-29-9
Lead (D008)	7439-92-1
Silver (D011)	7440-22-4

10 **H5.12.3 Hot Cell A through Hot Cell F SAP Schedule**

11 Confirmation closure sampling and analysis will be performed in accordance with the closure plan
 12 schedule in Section H6.

13 **H5.12.4 Hot Cell A through Hot Cell F Project Management**

14 The following subsections address project management and ensure that the project has defined goals, that
 15 the participants understand the goals and the approaches used, and that the planned outputs are
 16 appropriately documented. Project management roles and responsibilities discussed in this section apply
 17 to the major activities covered under the SAP.

18 The Permittee is responsible for planning, coordinating, sampling, preparing, packaging, and shipping
 19 samples to the laboratory. The project organization (regarding sampling and characterization) is
 20 described in the following subsections and shown graphically in Figure H17. The Project Manager
 21 maintains a list of individuals or organizations as points of contact for each functional element in
 22 Figure H17.

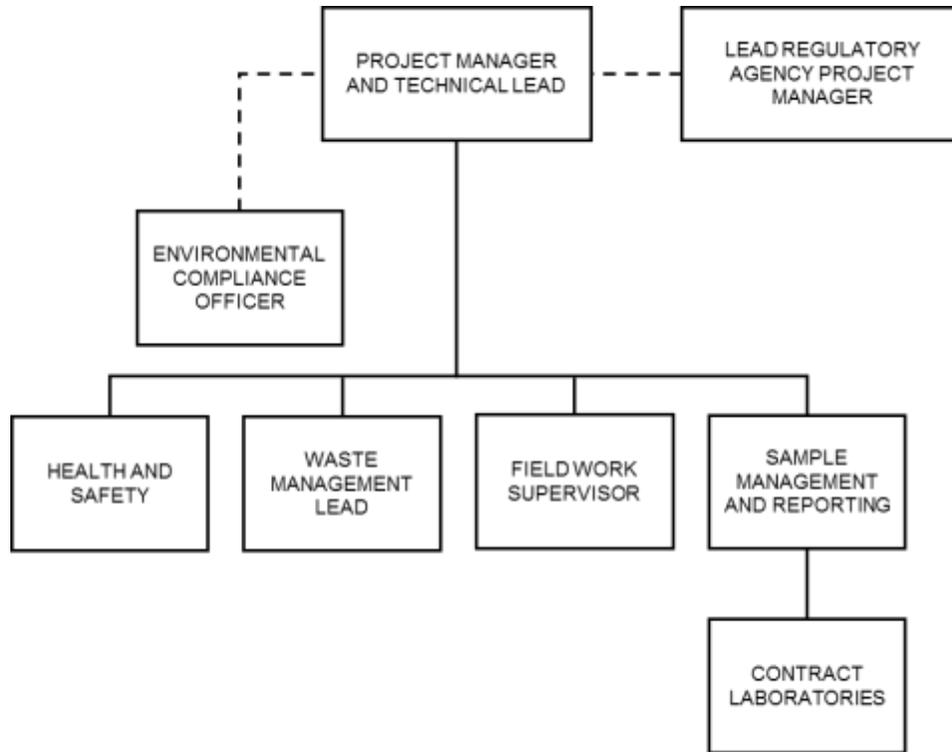


Figure H17. Hot Cell A through Hot Cell F Sampling and Analysis Plan Project Organization

The project has several key positions, including the following:

- **Lead Regulatory Agency Project Manager:** Ecology has assigned Project Managers responsible for closure oversight.
- **Project Manager:** The Project Manager provides oversight for activities and coordinates with DOE-RL, EPA, Ecology, and contract management. The Project Manager (or designee) for the Hot Cell A through Hot Cell F DWMU closure sampling is responsible for direct management of sampling documents and requirements, field activities, and subcontracted tasks. The Project Manager is responsible for ensuring that project personnel are working to the current version of the SAP. The Project Manager works closely with QA, Health and Safety, and the Field Work Supervisor (FWS) to integrate these and other lead disciplines in planning and implementing the work scope. The Project Manager also coordinates with DOE-RL and the primary contractor management on all sampling activities. The Project Manager supports DOE-RL in coordinating sampling activities with the regulators.
- **Environmental Compliance and Quality Assurance:** The Environmental Compliance Officer provides technical oversight, direction, and acceptance of project and subcontracted environmental work and develops appropriate mitigation measures with a goal of minimizing adverse environmental impacts.
- **Health and Safety:** The Health and Safety organization is responsible for coordinating industrial safety and health support within the project, as carried out through health and safety plans, job hazard analyses, and other pertinent safety documents required by federal regulation or by internal primary contractor work requirements.
- **Sample Management and Reporting:** The Permittee’s sampling organization coordinates field sampling as well as laboratory analytical work, ensuring that laboratories conform to Hanford Facility internal laboratory QA requirements (or their equivalent), as approved by

1 DOE-RL, EPA, and Ecology. The sampling organization receives the analytical data from the
2 laboratories, performs data entry into the Hanford Environmental Information System (HEIS)
3 database, and arranges for data validation. The sampling organization is responsible for
4 informing the Project Manager of any issues reported by the analytical laboratory.

- 5 • **Contract Laboratories:** The contract laboratories analyze samples in accordance with
6 established procedures and provide necessary sample reports and explanation of results in support
7 of data validation.
- 8 • **Waste Management:** The Waste Management organization communicates policies and protocols
9 and ensures project compliance for storage, transportation, disposal, and waste tracking.
- 10 • **Field Work Supervisor:** The FWS is responsible for planning and coordinating field sampling
11 resources. The FWS ensures that samplers are appropriately trained and available. Additional
12 related responsibilities include ensuring that the sampling design is understood and can be
13 performed as specified.

14 **H5.12.5 Sampling Design**

15 The primary purpose of sampling the underlying soil of the Hot Cell A through Hot Cell F DWMU is to
16 determine if analytical data values exceed MTCA (WAC 173-340) Method B clean closure
17 performance standards.

18 This SAP utilized Ecology Publication 94-111, Section 7.0, “*Sampling and Analysis for Clean Closure*,”
19 to determine the type of sampling design that will be utilized to demonstrate clean closure. When
20 designing the sampling plan, both focused and area wide (grid) sampling methods were considered.
21 Ecology Publication 94-111, Section 7.2.1, identifies area wide sampling as appropriate when the spatial
22 distribution of contamination at or from the closure unit is uncertain. Ecology Publication 94-111,
23 Section 7.3, “*Sampling to Determine or Confirm Clean Closure*,” identifies the area wide sampling
24 approach as generally appropriate to determine or confirm that clean closure levels are achieved. Focused
25 sampling, as identified in Section 7.2.2 of Ecology Publication 94-111, is selective sampling of areas
26 where contamination is expected or releases have been documented. Based on information provided in
27 Section H5.4 for contamination in Hot Cells D and E, judgmental (focused) sampling of the soil will take
28 place in the soil underlying those cells. Drawings in the operating record will be used to identify the
29 location of underlying focused sampling. The remainder of the Hot Cell A through Hot Cell F DWMU
30 underlying soil will include the area wide sampling approach. Both area wide and focused sampling are
31 further defined in the following paragraphs.

32 **Area-Wide (Grid) Sampling.** Samples are collected at regularly spaced intervals over space or time.
33 An initial location or time is chosen at random, and the remaining sampling locations are defined so that
34 locations are at regular intervals over an area (grid). Grid sampling is used to search for hot spots and
35 infer means, percentiles, or other parameters. It is useful for estimating spatial patterns or trends over
36 time. This design provides a practical method for designating sample locations and ensures uniform
37 coverage of a site, unit, or process.

38 **Judgmental (Focused) Sampling.** Selection of sampling units (i.e., the number and location and/or
39 timing of collecting samples) is based on knowledge of the feature or condition under investigation and
40 professional judgment. Focused sampling is distinguished from probability based sampling in that
41 inferences are based on professional judgment, not statistical scientific theory. Therefore, conclusions
42 about the target population are limited and depend entirely on the validity and accuracy of professional
43 judgment. Probabilistic statements about parameters are not possible.

44 Once WESF has been removed, the remaining area will be measured, and the dimensions will be
45 documented. Using measurements for the underlying soil area, the quantity and location of area wide
46 samples will be determined utilizing the Visual Sample Plan (VSP) software. VSP is a tool, used
47 throughout Washington State and nationally, that statistically determines the quantity of samples required

1 to accept or reject the null hypothesis. Parameters specific to the Hot Cell A through Hot Cell F DWMU
2 will be used as input to VSP for purposes of developing the sampling plan for this closure plan.

3 Both parametric and nonparametric equations rely on assumptions about the data population. Typically,
4 however, nonparametric equations require fewer assumptions and allow for more uncertainty about the
5 distribution of data. Alternatively, if the parametric assumptions are valid, the required number of
6 samples is usually less than if a nonparametric equation was used. For Hot Cells A through F, data
7 assumptions are largely based on information obtained from a grouping of similar waste sites. Parameters
8 from the 200-MG-1 waste sites were approved by Ecology in the SAP (DOE/RL-2009-60, *Sampling and*
9 *Analysis Plan for Selected 200-MG-1 Operable Unit Waste Sites*), evaluated, deemed appropriate, and
10 utilized as input parameters for Hot Cells A through F. VSP parameter inputs, and the basis for those
11 inputs, are detailed in Table H10.

12 The decision rule for demonstrating compliance with the MTCA (WAC 173-340) Method B clean closure
13 level has three parts:

- 14 • The upper 95 percent confidence limit on the true data mean must be less than the MTCA B clean
15 closure level.
- 16 • No sample concentration can be more than twice the cleanup level.
- 17 • Less than 10 percent of the samples can exceed the cleanup level.

18 For the purpose of utilizing VSP software, the null hypothesis will be that the site is considered
19 contaminated until proven clean, and it will be tested by comparing a site mean to a fixed threshold.
20 However, in addition to ensuring the site mean does not exceed the MTCA B clean closure performance
21 standards, data will be evaluated to ensure that less than 10 percent of the individual values exceed
22 MTCA (WAC 173-340) Method B clean closure performance standards and that no values are more than
23 twice the cleanup level.

24 Area-wide sample locations will be determined using the area-wide grid with a random start sampling
25 method run in VSP. Statistical analysis of systematically collected data are valid if a random start to the
26 grid is used. The first node location will be chosen at random by VSP, and subsequent sample locations
27 will be assigned by VSP using a grid sampling layout. The dimensions of the sample area (area under
28 Hot Cell A through Hot Cell F DWMU once removed or if combined, under the three WESF DWMUs)
29 will be entered into VSP to determine the locations of samples. The triangular grid sampling layout will
30 provide an even distribution of sample locations over the Hot Cell A through Hot Cell F DWMU. The
31 samples will be taken from the node locations indicated by VSP and will be assigned sample location
32 identifications and sample numbers using HEIS.

33 **H5.12.6 Sampling Methods and Handling**

34 A grab sample matrix will consist of soil collected in EPA Level 1 precleaned sampling containers
35 meeting the specifications in EPA 540/R-93/051, *Specifications and Guidance for Contaminant-Free*
36 *Sample Containers*, taken at a depth of 0 to 15.24 cm (0 to 6 in.) below ground surface. For the purpose
37 of this SAP, ground surface is defined as the exposed surface layer once the WESF structure has been
38 removed. Subsurface sampling was evaluated however, there have been no documented releases of free
39 liquid waste to the underlying soil so subsurface sampling was not deemed necessary.

Table H10. Visual Sample Plan Parameter Inputs

Parameter	Value	Basis
Primary Objective of the Sampling Design	Compare a site mean or median to a fixed threshold	Reject the null hypothesis.
Type of Sampling Design	Nonparametric	Data are not assumed to be normally distributed.
Working Null Hypothesis	The mean value at the site exceeds the threshold (MTCA B closure performance standards)	The null hypothesis assumes that the site is dirty requiring the sampling and analysis to demonstrate through statistical analysis that the site is clean.
Area Wide Grid Sampling Pattern	Triangular (assumed)	A triangular pattern will most likely provide an even distribution of sample locations over the Hot Cell A through Hot Cell F DWMU.
Standard Deviation (S)	0.45	This is the assumed standard deviation value relative to a unit action level for the sampling area. The value of 0.45 is conservative, based on consideration of past verification sampling. MARSSIM suggests 0.30 as a starting point; however, 0.45 has been selected to be more conservative. (Number of samples calculated increases with higher standard deviation values relative to a unit action level.)
Delta (Δ)	0.40	This is the width of the gray region. It is a user defined value relative to a unit action level. The value of 0.40 balances unnecessary remediation cost with sampling cost.
Alpha (α)	5%	This is the acceptable error of deciding a dirty site is clean when the true mean is equal to the action level. It is a maximum error rate since dirty sites with a true mean above the action level will be easier to detect. A value of 5% was chosen as a practical balance between health risks and sampling cost.
Beta (β)	20%	This is the acceptable error of deciding a clean site is dirty when the true mean is at the lower bound of the gray region. A value of 20% was chosen during the data quality objectives process as a practical balance between unnecessary remediation cost and sampling cost.
MARSSIM Sampling Overage	20%	MARSSIM suggests that the number of samples should be increased by at least 20% to account for missing or unusable data and uncertainty in the calculated value of n .

Reference: EPA 402-R-97-016, *Multi-Agency Radiation Survey and Site Investigation Manual (MARSSIM)*.

1 Once the soil is sampled, the sampled media will be screened to remove material larger than
 2 approximately 2 mm (0.08 in.) in diameter. Removal of material larger than approximately
 3 2 mm (0.08 in.) in diameter will allow for a larger surface area to volume ratio and be more likely to
 4 identify any potential contamination in the sample and will be in compliance with
 5 WAC 173-340-740(7)(a), “Unrestricted Land Use Soil Cleanup Standards.” Grab samples will be
 6 collected into containers at the chosen node sample locations. To ensure sample and data usability,
 7 sampling will be performed in accordance with established sampling practices, procedures, and
 8 requirements pertaining to sample collection, collection equipment, and sample handling. Soil sampling
 9 includes the following activities:

- 10 • Review of sampling request documentation
- 11 • Sample container and equipment preparation
- 12 • Field walkdown of sample area (includes marking sample locations)
- 13 • Sample collection and labeling
- 14 • Sample packaging, transporting, and shipping

15 Sample container, preservation, and holding time requirements are specified in Table H11 for soil
 16 samples. These requirements are in accordance with the analytical method specified. The final container
 17 type and volumes will be identified on the Sampling Authorization Form (SAF) and chain-of-custody
 18 form.

Table H11. Preservation, Container, and Holding Time Requirements for Soil Samples					
Method	Analysis/Analytes	Preservation Requirement	Holding Time	Bottle Type	Minimum Sample Size
EPA 6010	Metals by ICP-OES	Cool ≤6°C	180 days	G/P	20 g
EPA 7196	Chromium (Hexavalent)	Cool ≤6°C	30 days prior to extraction; 24 hours after extraction	G/P	20 g
Note: For the four-digit EPA methods, see SW-846, <i>Test Methods for Evaluating Solid Waste: Physical/Chemical Methods, Third Edition; Final Update V.</i>					
EPA	= U.S. Environmental Protection Agency	ICP	= inductively coupled plasma	OES	= optical emission spectrometry
G	= glass	P	= plastic		

19 To prevent potential contamination of the samples, decontaminated equipment will be used for each
 20 sampling activity.

21 EPA Level 1 precleaned sample containers will be used for samples collected for chemical analysis.
 22 Container sizes may vary depending on laboratory-specific volumes/requirements for meeting analytical
 23 detection limits.

24 The sample location, depth, and corresponding HEIS numbers will be documented in the sampler’s field
 25 logbook. A custody seal (e.g., evidence tape) will be affixed to each sample container and/or sample
 26 collection package in such a way as to indicate potential tampering.

27 Each sample container will be labeled with the following information on firmly affixed, water
 28 resistant labels:

- 29 • SAF and form number
- 30 • HEIS number
- 31 • Sample collection date and time

- 1 • Sampler identification
- 2 • Analysis required
- 3 • Preservation method (if applicable)

4 Sample records must include the following information:

- 5 • Analysis required
- 6 • Sample location
- 7 • Matrix (e.g., water or soil)

8 Sample custody will be maintained in accordance with existing Hanford Facility protocols to ensure
 9 maintenance of sample integrity throughout the analytical process. Chain-of-custody protocols will be
 10 followed throughout sample collection, transfer, analysis, and disposal to ensure that sample integrity
 11 is maintained.

12 All waste (including unexpected waste) generated by sampling activities will be containerized, labeled,
 13 characterized, designated as a dangerous or non-dangerous waste, stored, and transported offsite where it
 14 will be treated (if necessary) to meet the LDRs in 40 CFR 268, incorporated into WAC 173-303-140(2)(a)
 15 by reference, then ultimately disposed of in an approved waste disposal facility in accordance with
 16 WAC 173-303-610(5).

17 **H5.12.7 Analytical Methods**

18 All analyses and testing will be performed consistent with this closure plan, laboratory analytical
 19 procedures, and HASQARD (DOE/RL-96-68). Accreditation of environmental laboratories ensures a lab
 20 is capable of providing accurate and defensible analytical data. The selected laboratory must be
 21 accredited by Ecology for the parameters and methods used. The approved laboratory must ensure that
 22 data satisfy all the project specific data acceptance criteria in this SAP. If a target analyte is detected at or
 23 above the clean closure level but less than the practical quantitation limit of the analytical method,
 24 Ecology will be notified and alternatives will be discussed to demonstrate clean closure levels.

25 Analytical methods and performance requirements associated with the target analytes are outlined in
 26 Table H12.

27 **H5.12.8 Quality Control**

28 Quality control (QC) procedures must be followed in the field and laboratory to ensure that reliable data
 29 are obtained. Field QC samples will be collected to evaluate the potential for cross-contamination and
 30 provide information pertinent to field sampling variability. Field QC sampling will include:

- 31 • Collection of full trip blank
- 32 • Field transfer blank
- 33 • Equipment rinsate blank
- 34 • Field duplicate
- 35 • Field split samples

36 Laboratory QC samples estimate the precision and bias of the analytical data. Field and laboratory QC
 37 samples are summarized in Table H13.

38 A data quality assessment (DQA) will be performed utilizing the guidance in EPA/600/R-96/084,
 39 *Guidance for Data Quality Assessment: Practical Methods for Data Analysis* (EPA QA/G-9), and
 40 implementing the specific requirements in Section H5.12.9 through Section H5.12.11.

41 Data verification, data validation, and DQA will include both primary samples and QC samples.

1 **H5.12.9 Data Verification**

2 Analytical results will be received from the laboratory, loaded into a database (e.g., HEIS), and verified.
3 Verification includes, but is not limited to, the following activities:

- 4 • Amount of data requested matches the amount of data received (number of samples for requested
5 methods of analytes).
- 6 • Procedures/methods are used.
- 7 • Documentation/deliverables are complete.
- 8 • Hard copy and electronic versions of the data are identical.
- 9 • Data seem reasonable based on analytical methodologies.

10 **H5.12.10 Data Validation**

11 Data validation is performed by a third party. The laboratory supplies contract laboratory program (CLP)
12 equivalent analytical data packages intended to support data validation by the third party. The laboratory
13 submits data packages that are supported by quality control test results and raw data.

14 Controls are in place to preserve the data sent to the validators and allow only additions to be made, not
15 changes to the raw data.

16 The format and requirements for data validation activities are based upon the most current version of
17 USEPA-540-R-08-01, *National Functional Guidelines for Superfund Organic Methods Data Review*
18 (OSWER 9240.1-48), and, USEPA-540-R-10-011, *National Functional Guidelines for Inorganic*
19 *Superfund Data Review* (OSWER 9240.1-51). As defined by the validation guidelines, 5 percent of the
20 results will undergo Level C validation.

21 In accordance with Table H10, at least 80 percent of the sample results must be acceptable (data not
22 rejected during the data validation process).

23 **H5.12.11 Verification of VSP Input Parameters**

24 Analytical data will be entered back into VSP software. If all the analytical data for a particular analyte is
25 nondetect, verification of VSP input parameters will not be required for that analyte. VSP software uses
26 the analytical data to determine if the user input parameters were estimated appropriately. Once
27 analytical data are entered into VSP, the software will calculate the true standard deviation and if the null
28 hypothesis can be rejected. If the calculated standard deviation is smaller than the estimated user input
29 standard deviation, no additional sampling will be required. If the calculated standard deviation is larger
30 than the estimated standard deviation, additional sampling may be required. Comparison of the maximum
31 data value for each analyte to the clean closure standards will ensure all individual analytes are below the
32 action levels. Verification of the null hypothesis through VSP will determine if the mean value of the site
33 analytical data supports rejection of the null hypothesis (Section H4.1).

34 **H5.12.12 Documents and Records**

35 The Project Manager is responsible for ensuring that the current version of the SAP is being used and
36 providing any updates to field personnel. The current version of the SAP is maintained by Ecology.
37 Changes to the SAP affecting the data will be submitted as a permit modification in accordance with
38 WAC 173-303-610(3)(b) by the permittees to Ecology.

Table H12. Soil Analytical Performance Requirements

Chemical Abstracts Service Number	Analyte ^a	Analytical Method	Closure Performance Standard (mg/kg)		Practical Quantitation Limit (mg/kg)	Accuracy Req't (% Recovery) ^c	Precision Req't (RPD) ^c
			Carcinogen	Noncarcinogen			
7440-39-3	Barium	SW-846 Method 6010	--	1.60E+04	2.00E+00	±30	≤30
7440-43-9	Cadmium	SW-846 Method 6010	--	8.00E+01	5.00E-01	±30	≤30
18540-29-9	Chromium (Hexavalent)	SW-846 Method 7196	--	2.40E+02	1.00E+00	±30	≤30
7439-92-1	Lead ^b	SW-846 Method 6010	--	2.50E+02	5.00E+00	±30	≤30
7440-22-4	Silver	SW-846 Method 6010	--	4.00E+02	1.00E+00	±30	≤30
<p>a. Unless otherwise noted, closure performance standards are the numeric cleanup levels calculated using unrestricted use exposure assumptions according to MTCA (<u>WAC 173-340</u>) Method B (unrestricted use standards). Where both carcinogen and noncarcinogen performance standards are available, the most conservative value will be used.</p> <p>b. Closure performance standards are the numeric cleanup levels calculated using unrestricted use exposure assumptions according to MTCA (<u>WAC 173-340</u>) Method A (unrestricted use standards). MTCA Method A values were used when MTCA Method B values were not available.</p> <p>c. Accuracy criteria for associated batch matrix spike percent recoveries. Evaluation based on statistical control of laboratory control samples is also performed. Precision criteria for batch laboratory replicate matrix spike analyses or replicate sample analyses.</p>							
CAS = chemical abstract service			Req't = requirement				
CFC = chlorinated fluorocarbon			WAC = Washington Administrative Code				
MTCA = Model Toxics Control Act							

Table H13. Project Quality Control Sampling Summary

Quality Control Sample Type	Frequency	Characteristics Evaluated
Field Quality Control		
Trip Blanks	One per 20 samples per media sampled One per cooler for VOCs	Contamination from containers or transportation
Equipment Rinsate Blanks	If only disposable equipment is used, then an equipment blank is not required Otherwise, one per 20 samples per analytical method per media sampled, or one per day ^a	Adequacy of sampling equipment decontamination and contamination from non-dedicated equipment
Field Duplicates	One per batch ^g , 20 samples maximum of each media sampled (soil samples)	Precision, including sampling and analytical variability
Field Split Samples	When needed, the minimum is one per analytical method, per media sampled, for analyses performed where detection limit and precision and accuracy criteria have been defined in the Performance Requirements tables ^h	Precision, including sampling, analytical, and interlaboratory
Laboratory Quality Control		
Method Blanks	1 per batch ^g	Laboratory contamination
Lab Duplicates	b	Laboratory reproducibility and precision
Matrix Spikes	b	Matrix effect/laboratory accuracy
Matrix Spike Duplicates	b	Laboratory reproducibility, accuracy, and precision
Surrogates	b	Recovery/yield
Tracers	b	Recovery/yield
Laboratory Control Samples	1 per batch ^g	Evaluate laboratory accuracy
Performance Evaluation Programs ^c	Annual	Evaluate laboratory accuracy
Double-Blind Standards	Quarterly ^d	Evaluate laboratory accuracy
Audit/Assessment	Annually ^e or every 3 years ^f	Evaluate overall laboratory performance and operations

Table H13. Project Quality Control Sampling Summary

Quality Control Sample Type	Frequency	Characteristics Evaluated
<p>a. Whenever a new type of nondedicated equipment is used, an equipment blank shall be collected every time sampling occurs until it can be shown that less frequent collection of equipment blanks is adequate to monitor the decontamination procedure for the nondedicated equipment.</p> <p>b. As defined in the laboratory contract or quality assurance plan and/or analysis procedures.</p> <p>c. Nationally recognized program, such as DOE Mixed Analyte Performance Evaluation Program or Environmental Resource Associates.</p> <p>d. Soil matrix double-blind standards are submitted by request of Analytical Services.</p> <p>e. DOE Quality Systems for Analytical Services requires annual audit of commercial laboratories.</p> <p>f. DOE/RL-96-68, <i>Hanford Analytical Services Quality Assurance Requirements Document (HASQARD)</i>, does not define a frequency for assessment of onsite laboratories. Three year evaluated supplier list requirement is typically applied.</p> <p>g. Batching across projects is allowing for similar matrices.</p> <p>h. Field split samples are generally used for interlaboratory comparison as periodic checks in large sample sets or when a particular method or laboratory has been producing unexpected results. Field splits are not required for small, discrete sample sets undergoing routing analyses using methods for which splits have been submitted as part of larger sample sets.</p> <p>DOE = U.S. Department of Energy</p>		

1 Logbooks are required for field activities. A logbook must be identified with a unique project name and
 2 number. The individual(s) responsible for logbooks will be identified in the front of the logbook, and
 3 only authorized persons may make entries in logbooks. Logbooks will be signed by the field manager,
 4 supervisor, cognizant scientist/engineer, or other responsible individual. Logbooks will be permanently
 5 bound, waterproof, and ruled with sequentially numbered pages. Pages will not be removed from
 6 logbooks for any reason. Entries will be made in indelible ink. Corrections will be made by marking
 7 through the erroneous data with a single line, entering the correct data, and initialing and dating
 8 the changes.

9 The Project Manager is responsible for ensuring that a project file is properly maintained. The project file
 10 will contain the records or references to their storage locations. The following items will be included in
 11 the project file:

- 12 • Field logbooks or operational records
- 13 • Data forms
- 14 • Global positioning system data
- 15 • Chain-of-custody forms
- 16 • Sample receipt records
- 17 • Inspection or assessment reports and corrective action reports
- 18 • Interim progress reports
- 19 • Final reports
- 20 • Laboratory data packages
- 21 • Verification and validation reports

22 The laboratory is responsible for maintaining, and having available upon request, the following items:

- 23 • Analytical logbooks
- 24 • Raw data and QC sample records
- 25 • Standard reference material and/or proficiency test sample data
- 26 • Instrument calibration information

1 Records may be stored in either electronic or hard copy format. Documentation and records, regardless
2 of medium or format, are controlled in accordance with internal work requirements and processes to
3 ensure the accuracy and retrievability of stored records. Records generated during closure will be
4 maintained in the facility operating record for a minimum of 5 years after the clean closure certification
5 has been accepted by Ecology.

6 **H5.12.13 Sampling and Analysis Requirements to Address Removal of Contaminated** 7 **Soil**

8 In the event that sample results based on the MTCA (WAC 173-340) Method B three-part test
9 (Section H5.12.5) indicate contamination above clean closure levels, the contaminated soil will be
10 removed in accordance with Section H5.10. Following removal of contaminated soil, additional samples
11 will be taken at the same grid location as identified by VSP. Additional focused sampling may be added
12 in areas where contamination is identified (Section H5.12.5). Additional focused samples will be
13 documented, as required in Section H5.12.12, and provided with the closure certification upon request by
14 Ecology. These samples will be analyzed in accordance with the methods specified in Table H12, with
15 accompanying QC samples as discussed in Section H5.12.8.

16 **H5.12.14 Revisions to the Sampling and Analysis Plan and Constituents to Be Analyzed**

17 If changes to the SAP are necessary due to unexpected events during closure that will affect sampling, a
18 revision to this SAP will be submitted no later than 30 days after the unexpected event as a permit
19 modification as required in WAC 173-303-610(3)(b)(iii) and WAC 173-303-830, "Permit Changes."

20 **H5.13 Role of the Independent, Qualified, Registered Professional Engineer**

21 An independent, qualified, registered professional engineer (IQRPE) will be retained to provide
22 certification of the clean closure activities described in this closure plan, as required by
23 WAC 173-303-610(6). The engineer will be responsible for reviewing completed field activities and
24 documents associated with these initial closure activities. At a minimum, field activities and documents
25 reviewed for certification of these closure plan activities would include the following:

- 26 • Review of the final design and grout testing plan
- 27 • Review of project documentation created during initial closure activities
- 28 • Review of documentation or inspection of the stabilized Hot Cells A through F
- 29 • Review of the grout testing report
- 30 • Observe and/or review demolition activities
- 31 • Observe and/or review hazardous waste disposal documentation
- 32 • Review sampling procedures and results
- 33 • Observe and/or review sampling activities
- 34 • Observe and/or review contaminated environmental media removal (as applicable)
- 35 • Verify that locations of samples are as specified in the SAP

36 The engineer will record observations and reviews in a written report that will be retained in the operating
37 record. The resulting report will be used to support the clean closure certification of the Hot Cell A
38 through Hot Cell F DWMU. Final clean closure certification will be conducted after closure activities are
39 completed for the Hot Cell A through Hot Cell F DWMU and in coordination with closure certification of
40 the Pool Cells and Hot Cell G DWMUs.

41 **H5.14 Certification of Clean Closure**

42 In accordance with WAC 173-303-610(6), within 60 days of completion of the final closure activities for
43 the Hot Cell A through Hot Cell F DWMU, certification that closure activities have been completed in

1 accordance with the specifications in the approved closure plan will be submitted to Ecology by
2 registered mail. The certification will be signed by the owner or operator and signed and stamped by
3 an IQRPE.

4 Upon request by Ecology, the following information will be submitted to support closure certification:

- 5 • All field notes and photographs related to closure activities.
- 6 • Description of any minor deviations from the approved closure plan and justification for
7 these deviations.
- 8 • Documentation of the final disposition of all dangerous wastes and dangerous waste residues
9 (if applicable), including contaminated environmental media.
- 10 • Verification of hot cell isolation activities.
- 11 • Verification that grouting of Hot Cells A through F occurred as planned in the described in
12 work documents.
- 13 • Verification of demolition.
- 14 • All laboratory and/or field data, including sampling procedures, sampling locations, QA/QC
15 samples, and chain-of-custody procedures for all samples and measurements, including samples
16 and measurements taken to determine or confirm clean closure.
- 17 • Summary report that identifies and describes the data reviewed by the IQRPE and tabulates the
18 analytical results of samples taken to determine and confirm clean closure.
- 19 • Description of what the DWMU area looks like at completion of closure, including a description
20 of the former unit after closure.
- 21 • Additional data, as required, by final clean closure of the Pool Cells and Hot Cell G DWMU
22 closure plans.

23 The final clean closure activity for the Hot Cell A through Hot Cell F DWMU will be accomplished
24 through removal of the DWMU, which will be addressed in the closure plan for the other two operating
25 DWMUs. The Hot Cells A through Hot Cell F DWMU clean closure certification will be provided in
26 conjunction with clean closure certification of the Pool Cells and Hot Cell G DWMU and the entire
27 WESF OUG.

28 **H5.15 Conditions that Will Be Achieved When Closure is Complete**

29 Upon completion of the initial and final closure activities outlined within this closure plan, the Hot Cell A
30 through Hot Cell F DWMU will be isolated and stabilized with grout, demolished, removed, and disposed
31 of at ERDF.

32 Final clean closure conditions will be demonstrated in conjunction with the other two operating
33 DWMU closures.

34 **H6 CLOSURE SCHEDULE AND TIME FRAME**

35 Final clean closure activities will take place in conjunction with final closure for the WESF Operating
36 Unit Group. Stabilization via grout of Hot Cells A through F is a necessary step to prevent threats to
37 HHE and support final closure of the WESF Operating Unit Group.

38 The Hanford Facility has an ongoing need to store cesium and strontium capsules safely and compliantly
39 until a disposal alternative is available. While efforts are underway to implement an alternative method, it
40 is anticipated to be a number of years before the capsules can be safely transferred from WESF to an
41 alternative storage.

42 Continued storage of WESF capsules requires the Pool Cells and Hot Cell G DWMUs to remain
43 operational until alternative storage capability is available. Continued capsule storage will necessitate an

1 extension to the 180 days to complete final clean closure activities for the Hot Cell A through Hot Cell F
 2 DWMU required in WAC 173-303-610(4)(b). This extension is being requested in accordance with
 3 WAC 173-303-610(4)(b)(i).

4 Hot Cells A through F contain a significant amount of legacy radioactive contamination. Stabilization of
 5 this contamination with grout will eliminate the potential for a release of this contamination while the
 6 cesium and strontium capsules are stored in the WESF pool cells. Additionally, stabilization of the
 7 legacy contamination will eliminate the potential for a release of dangerous waste constituents to the
 8 environment or to workers when the capsules are transferred out of WESF.

9 Approval of this closure plan will grant the Hanford Facility an extended closure period for performance
 10 of final clean closure activities, in accordance with WAC 173-303-610(4)(b), and a separate extension
 11 request will not be filed.

12 During this extended closure period, the Hanford Facility will comply with all applicable requirements of
 13 the permit. Additionally, the stabilized hot cells will be maintained in a manner that prevents threats to
 14 HHE and monitored through routine radiation surveillances, using radiation as an indication of
 15 contamination outside the stabilized Hot Cell A through Hot Cell F DWMU.

16 Closure activities and extended closure period expected durations are outlined in the closure activities
 17 schedule for the Hot Cell A through Hot Cell F (Table H14).

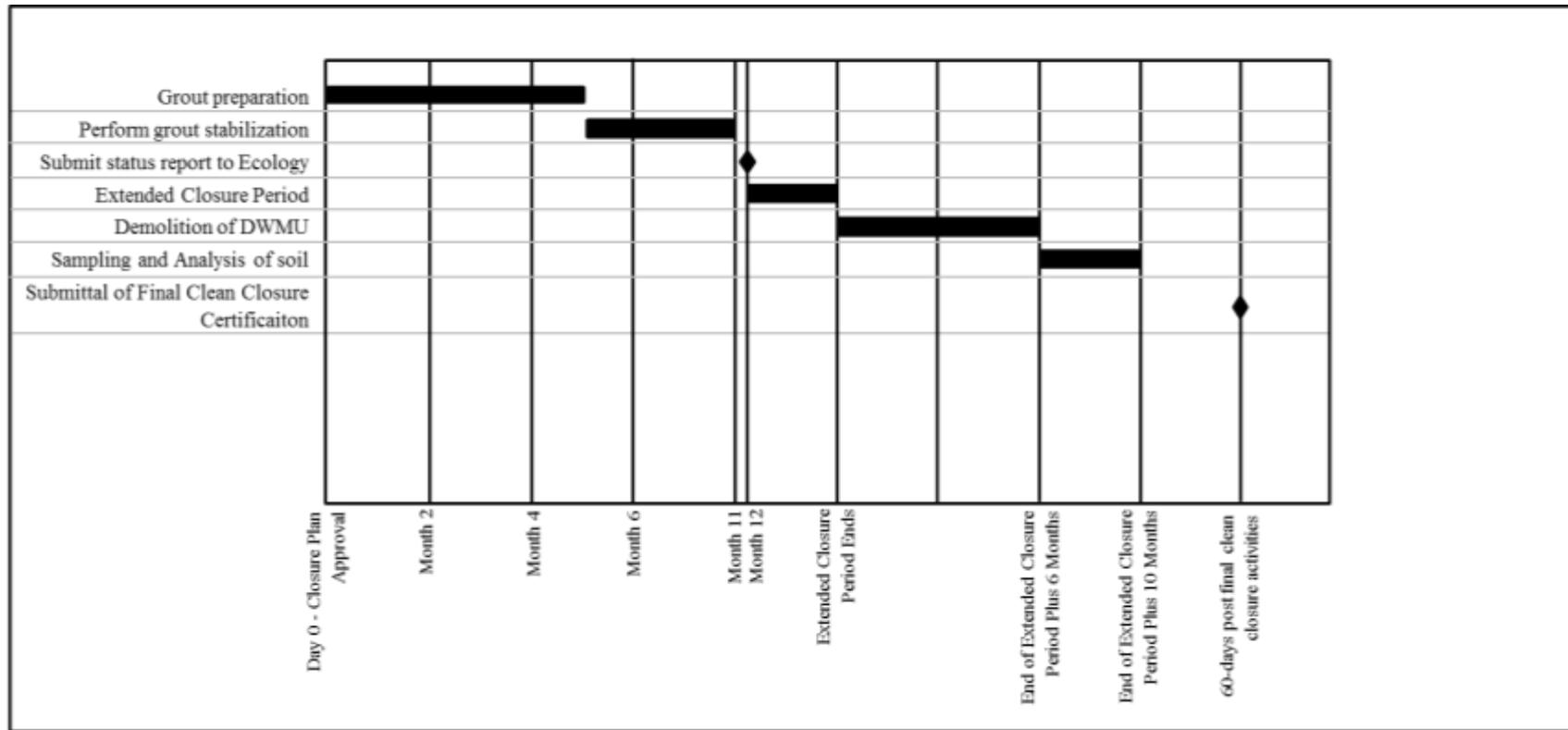
Table H14. Waste Encapsulation and Stabilization Facility Hot Cell A through Hot Cell F Closure Activities Schedule		
Closure Activity Description		Expected Duration
Primary Activity	Secondary Activity	Duration
Preclosure Preparation Activities		
Prepare WESF <ul style="list-style-type: none"> • Isolating equipment that connects to the K3 exhaust system ducting • Isolating utility lines that remain connected to the hot cells. These utilities include air and electrical services 	Isolate equipment that connects the K3 exhaust system ducting	N/A
	Isolate utility lines that remain connected to the hot cells, including air and electrical services	
	Install covers over/seal viewing windows, manipulator ports, and pass-throughs (drain window oil prior to cover installation)	
	Pour concrete block over Hot Cell D/E hot spot in service gallery	
Closure Activities		
Grout preparation	Core Drilling into DWMU	5 months
Perform grout stabilization	Grout K3 Filter Pit	6 months
	Grout K3 Duct and Trench	
	Grout Hot Pipe Trench	
	Grout Hot Cell A through Hot Cell F	
	Grout Hot Cell A Air Lock	

Table H14. Waste Encapsulation and Stabilization Facility Hot Cell A through Hot Cell F Closure Activities Schedule		
Closure Activity Description		Expected Duration
Submit to Ecology a status report of the Hot Cell A through Hot Cell F stabilization project	N/A	1 month after stabilization complete
Extended Closure Activities		
Extended closure period to coincide with clean closure of the Pool Cells and Hot Cell G DWMU activities	Continued surveillances and inspections	To be determined
Demolition of the Hot Cell A through Hot Cell F DWMU	Equipment mobilization	10 days
	Demolition and removal of waste generated	6 months
Sampling and analysis of underlying soil (includes data verification and data validation)	N/A	4 months
Closure Activities Complete		
Submit final clean closure certification	N/A	60 days after final clean closure activities complete
N/A = not applicable		

1 **H7 COST OF CLOSURE**

2 A detailed written estimate outlining updated projections of anticipated closure costs for the Hanford
 3 Facility TSD units having final status is not required per Permit Condition II.H.

4



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Figure H18. Waste Encapsulation and Stabilization Facility Hot Cell A through Hot Cell F Closure Plan Schedule

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