

SUMMARY OF ACTION ITEMS FOR JUNE 2004 QUARTERLY MEETING

Monday 6/21/04

CSSF/WCF -- no specific action items

TRA (VCO) – no specific action items

Lead Management ARARs for PBF Reactor Decommissioning Discussion – INEEL to provide a Preliminary Evaluation of Alternatives for Decommissioning PBF Reactor report to DEQ for review. The state of Idaho indicated it's willingness to review information supporting INEEL's determination of how much lead can be removed from the PBF.

Tuesday 6/22/04

Breakout Session - ANL-W Items -- no specific action items

- Consolidated Permit Status
- RSSF closure Status
- Remote Treatment Project update

DEQ Items

- HWMA/RCRA Workplan – RTF change will be added to September revision
- Volume 14 – no specific action items
 - PEWE Air Sampling Document
 - PEWE/LET&D Compliance Schedules
 - Potential ETS Permitting Issues
- BNFL CCR – no specific action items
- RCRA/CERCLA Integration (Deferral of contaminated soils through RCRA closure) – no specific action items

RCRA Closures Status – no specific action items

RCRA Permitting Status

- RWMC Re-application – due to DEQ by May 17, 2005
- Volume 3 Update – to be submitted to DEQ by July 31, 2004
- PMRs Status – no specific action items
- Permit Interpretation Question – no specific action items
- Electronic Submittals – no specific action items

Eliminate Mixed Low-Level Waste Project Status – no specific action items

Manifest Discrepancies Response – no specific action items

Breakout Sessions

WCF Post-Closure Permit Monitoring – no specific action items

SBW Treatment Risk Assessment Template – no specific action items

VCO topics – Final VCO Closure Milestone

Copies of proposed final milestone language for VCO closures were provided as a handout and discussed. Where historically the VCO has included a specific date for the submittal of the certification of closure, it was agreed that in the future the following language will be inserted for the submittal of certification of

closure milestone: “60 days following completion of closure as identified in the approved closure plan.” This change will prevent negotiated changes to the closure plan schedule from impacting the final VCO milestone.

Management of Contaminated Soils Under Amended Catch Tank System Closure Plan

DEQ expressed concern regarding the approach being proposed for soils in the amended Catch Tank System (CTS) closure plan. Specifically, in the amended closure plan, contaminated soil caused by a release from the CTS that exceeds a risk of $1 \text{ E-}06$ or a hazard index of 1 is identified as a new site and submitted to the agencies for approval. Certification of closure is dependent on the New Site Identification Form being approved. DEQ stated that the soil needed to be removed under closure to the extent practicable before handing off to CERCLA, and that a direct hand-off to CERCLA was only workable where the soil fell within an existing CERCLA site. After some discussion, it was agreed that conditions making soil removal impracticable could include presence of active utility lines (e.g., fire water mains) and impact to structures (i.e., removal of soil would result in structural impacts to an active building).

The INEEL also presented information indicating that a large portion of the soil underlying the CTS warm waste lines and catch tanks fell within the TRA-19 CERCLA site, and clarified that the selected alternative in the Operable Unit 2-13 ROD for this site was Limited Action, which included access restrictions, limited use and review of the remedy every five years. The reason stated in the ROD for selecting the alternative was that the contamination associated with the site was located under the ground surface in and around active radioactive waste piping and tank systems and buildings where access is limited, preventing the implementation of excavation alternatives. Consequently, any additional contamination identified within this site during closure of the CTS would be considered in the final remedy. Depending on the extent and/or severity of contamination, more immediate action could also be taken to remove the soil under a CERCLA removal action.

After some discussion, the INEEL agreed to provide alternative language for DEQ’s consideration regarding management of contaminated soils in the amended CTS closure plan.

Wednesday 6/23/04

AMWTF – BNFL to provide additional structural calculations to DEQ (provided at walkdown and formally transmitted on June 25, 2004)