

PUREX STORAGE TUNNELS
CHAPTER 11.0
CLOSURE AND FINANCIAL ASSURANCE
CHANGE CONTROL LOG

Change Control Logs ensure that changes to this unit are performed in a methodical, controlled, coordinated, and transparent manner. Each unit addendum will have its own change control log with a modification history table. The “**Modification Number**” represents Ecology’s method for tracking the different versions of the permit. This log will serve as an up to date record of modifications and version history of the unit.

Modification History Table

Modification Date	Modification Number
07/23/2020	PCN-PUREX-2019-03 (8C.2020.Q3)
02/28/2019	PCN-PUREX-2019-01 (8C.2019.Q1)
12/17/2018	8C.2018.5F
10/2006	

This page intentionally left blank.

1
2
3
4
5
6

CHAPTER 11.0
CLOSURE AND FINANCIAL ASSURANCE

1
2
3
4
5

This page intentionally left blank.

CHAPTER 11.0
CLOSURE AND FINANCIAL ASSURANCE

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
29
30
31
32
33
34
35
36

TABLE OF CONTENTS

11.0 CLOSURE AND FINANCIAL ASSURANCE..... 11.7

11.1 Introduction 11.7

11.2 Facility Contact Information 11.7

11.3 Facility Description 11.8

11.3.1 Maximum Waste Inventory 11.8

11.4 Closure Performance Standards 11.8

11.4.1 Closure Decision 11.9

11.5 Interim Closure Activities 11.9

11.5.1 Training Requirements 11.9

11.5.2 Security 11.9

11.5.3 Preparedness, Prevention, and Emergency Procedures 11.9

11.5.4 Inspections..... 11.9

11.5.5 Interim Closure of Tunnel Number 1 11.15

11.5.6 Interim Closure of Tunnel Number 2 11.19

11.6 Final Closure Activities..... 11.21

11.6.1 Retrieval/Clean Closure Options..... 11.21

11.6.2 In Situ Disposal (Landfill Closure) 11.23

11.6.3 Identifying and Managing Contaminated Media..... 11.23

11.6.4 Role of Independent Qualified Registered Professional Engineer 11.23

11.6.5 Certification of Closure..... 11.24

11.6.6 Conditions that will be Achieved when Closure is Complete 11.24

11.7 Closure Schedule and Time Frame 11.24

11.8 Cost of Closure..... 11.25

11.9 References 11.25

TABLES

Table 11-1 Washington Administrative Code 173-303-680(2) through (4) Requirements 11.11

Table 11-2 Standard Grout Formulation 11.17

Table 11-3 PUREX Storage Tunnels Closure Activities Schedule 11.24

FIGURES

1 Figure 11-1 Plan View of Tunnel Number 1 with Equipment Placement and Layout 11.27
2 Figure 11-2 West Elevation of Tunnel Number 1 with Equipment Placement 11.28
3 Figure 11-3 Isometric of Tunnel Number 1 Grouting Equipment – Platform and Piping Arrangement
4 11.29
5 Figure 11-4 West Elevation of Tunnel Number 1 Grouting Equipment – Platform and Piping..... 11.30
6 Figure 11-5 South Elevation of Tunnel Number 1 Grouting Equipment – Platform and Piping..... 11.31
7 Figure 11-6 Passive Ventilation Filter Assembly for Tunnel Number 1 11.32
8 Figure 11-7 Tunnel Number 1 Site Plan 11.33
9 Figure 11-8 Tunnel Number 2 Site Plan 11.34
10 Figure 11-9 Plug Replacement for Existing Riser in Tunnel Number 2 (Isometric and Plan Views) .. 11.35
11 Figure 11-10 Equipment to be Deployed Through Existing Riser in Tunnel Number 2 (Two Elevations
12 and Isometric) 11.36
13 Figure 11-11 Location of Risers and Equipment for Grouting Tunnel Number 2..... 11.37
14 Figure 11-12 Goose-Neck Grout Delivery Piping for Tunnel Number 2 11.38
15 Figure 11-13 PUREX Tunnel No. 2 Interim Stabilization Drawing List, Notes, and Legend,
16 #H-2-837312-1 11.39
17 Figure 11-14 PUREX Tunnel No. 2 Interim Stabilization Enlarged Site Plan 1, #H-2-837314-1 11.40
18 Figure 11-15 PUREX Tunnel No. 2 Interim Stabilization Enlarged Site Plan 2, #H-2-837314-2 11.41
19 Figure 11-16 PUREX Tunnel No. 2 Interim Stabilization Grout Insertion Device, #H-2-837316-1 ... 11.42
20 Figure 11-17 PUREX Tunnel No. 2 Interim Stabilization Grout Insertion EXT Boom,
21 #H-2-837317 11.43
22
23

1 **11.0CLOSURE AND FINANCIAL ASSURANCE**

2 This addendum details closure activities for the Plutonium Uranium Extraction (PUREX) Storage Tunnels
3 Operating Unit Group 2. This Operating Unit Group consists of Tunnel Number 1 and
4 Tunnel Number 2 Dangerous Waste Management Units (DWMUs).

5 **11.1 Introduction**

6 The PUREX Storage Tunnels are permitted and managed as *Resource Conservation and Recovery Act of*
7 *1976* (RCRA) miscellaneous units; however, the tunnels are no longer in active operation. In May 2017,
8 workers discovered a portion of Tunnel Number 1 had collapsed, prompting an immediate response action
9 to protect workers and the environment. A structural evaluation revealed the threat of further failure of
10 Tunnel Number 1. An interim stabilization measure to fill Tunnel Number 1 with engineered grout was
11 taken under Section J.4.5 of the PUREX Tunnels Contingency Plan and Permit Condition V.25.A.1 of the
12 Hanford Facility RCRA Permit. Grouting in Tunnel Number 1 was completed in November 2017.
13 Filling the tunnel void spaces with grout improved tunnel stability, provided additional radiological
14 protection, and increased durability while not precluding final closure actions. Tunnel Number 1 will
15 receive no new waste and will continue to store the existing encapsulated waste until final closure.

16 At the same time, a structural evaluation also revealed the threat of future failure of Tunnel Number 2. To
17 protect stored waste containers from potential damage caused by a tunnel failure event (e.g., puncture of a
18 container by a falling structural member) and to prevent any associated release of dangerous waste
19 constituents to the environment, an interim closure action to cover the stored waste and fill Tunnel
20 Number 2 void spaces around the waste with engineered grout is being taken. No waste has been added
21 to Tunnel Number 2 since 1996 and no waste will be added or removed, nor will personnel entry be
22 permitted prior to grouting because of the threat of structural failure. Following implementation of the
23 interim closure action, Tunnel Number 2 will store encapsulated waste until final closure.

24 Interim closure activities will ensure safe storage of dangerous waste until final closure can be completed.
25 The response action to grout Tunnel Number 1 serves as the interim closure action for Tunnel Number 1
26 and is described in Section 11.5.5. Interim closure of Tunnel Number 2 will be completed in accordance
27 with the activities described in Section 11.5.6. Following completion of the interim closure activities, an
28 extended closure period will commence and the tunnels will be monitored and maintained until final
29 closure. Final closure activities will be completed concurrent with remediation of the PUREX Plant as
30 described in Section 11.6.

31 **11.2 Facility Contact Information**

32 PUREX Operator and Property Owner:

33 Doug S. Shoop, Manager
34 U.S. Department of Energy, Richland Operations Office
35 P.O. Box 550
36 Richland, WA 99352
37 (509) 376-7395

38 PUREX Co-Operator:

39 L. Ty Blackford, President and Chief Executive Officer
40 CH2M HILL Plateau Remediation Company
41 P.O. Box 1600
42 Richland, WA 99352
43 (509) 373-0293

1 11.3 **Facility Description**

2 The PUREX Plant is located in the southeast portion of the 200 East Area. The PUREX Plant was used
3 for the recovery of uranium and plutonium from irradiated reactor fuel. The PUREX Plant was built in
4 1956 and operated until 1972. It was restarted in 1983 and operated until 1989.

5 The PUREX Storage Tunnels are permitted as miscellaneous units under Washington Administrative
6 Code (WAC) 173-303-680, but are no longer in active operation and comprise Closing Unit Group 25.

7 Both tunnels are planned for closure, and no new waste will be accepted for placement into the tunnels.

8 **PUREX Tunnel Number 1.** Construction of PUREX Storage Tunnel Number 1 was completed in 1956.
9 Tunnel Number 1 is approximately 5.8 meters (19 feet) wide by 6.7 meters (22 feet) high by 109 meters
10 (358 feet) long and provides storage space for eight railcars. The maximum process design capacity for
11 storage in Tunnel Number 1 is approximately 4,129 cubic meters (5,400 cubic yards). The tunnel
12 experienced a partial roof collapse in May 2017. An interim stabilization was taken, and the tunnel was
13 filled with grout in October and November 2017.

14 **PUREX Tunnel Number 2.** Construction of PUREX Storage Tunnel Number 2 was completed in 1964.
15 The storage area of Tunnel Number 2 is approximately 5.8 meters (19 feet) wide by 6.7 meters (22 feet)
16 high by 514.5 meters (1,688 feet) long and provides storage space for 40 railcars. The maximum process
17 design capacity for storage in Tunnel Number 2 is approximately 19,878 cubic meters (26,000 cubic
18 yards). Due to the potential of roof collapse, the tunnel will be interim closed by grout filling of the waste
19 in 2018.

20 Diagrams of the layout of Tunnel Numbers 1 and 2 are shown in the PUREX Storage Tunnels Part A.

21 11.3.1 **Maximum Waste Inventory**

22 The PUREX Tunnels currently store eight railcars in Tunnel Number 1 and 28 railcars in Tunnel
23 Number 2. The waste volume in Tunnel Number 1 is approximately 596 cubic meters (780 cubic yards).
24 The waste volume in Tunnel Number 2 is approximately 2,204 cubic meters (2,883 cubic yards). This is
25 the maximum waste inventory as no additional waste will be stored.

26 11.4 **Closure Performance Standards**

27 Closure performance standards for final closure of the PUREX Storage Tunnels will be based on
28 WAC 173-303-610(2)(a)(i)-(iii), which requires closure of the facility in a manner that accomplishes the
29 following objectives:

- 30
- Minimizes the need for further maintenance.
 - 31 • Controls, minimizes, or eliminates to the extent necessary to protect human health and the
32 environment, post-closure escape of dangerous waste, dangerous constituents, leachate,
33 contaminated runoff, or dangerous waste decomposition products to the ground, surface water,
34 groundwater, or the atmosphere.
 - 35 • Returns the land to the appearance and use of surrounding land areas, to the degree possible,
36 given the nature of the previous dangerous waste activity.

37 Annual surveillance of the PUREX Storage Tunnels will be conducted as described in Addendum I,
38 "Inspection Requirements." During the closure period until final closure activities are conducted, the
39 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), will apply. Compliance with these standards is addressed in
41 Table 11-1.

1 11.4.1 **Closure Decision**

2 This closure plan describes interim closure actions through the filling of the PUREX Storage Tunnels
3 DWMUs with grout. The final closure decision for the PUREX Tunnels DWMUs has not been made, and
4 will be made together with the remedial actions decisions for the 200-CP-1 Operable Unit. There are two
5 options for closure of the PUREX Tunnels:

- 6 1. **Clean Closure.** For more detailed description of clean closure of the PUREX Tunnels, see
7 Section 11.6.1. Clean closure requires removal of all waste and confirmation of clean closure
8 levels for the dangerous waste constituents. The grout will cure to a strength to provide structural
9 support in less than 24 hours. After 28 days, the grout will have a minimum strength of 1200 to
10 2000 pounds per square inch and could be cut with a diamond wire saw or other technology to
11 enable removal of the equipment. The clean closure levels will be adopted from the Record of
12 Decision (ROD) for the 200-CP-1 Operable Unit.
- 13 2. **Landfill Closure.** For more detailed description of landfill closure of the PUREX Tunnels, see
14 Section 11.6.2. Landfill closure leaves waste in place and requires that a final cover is
15 constructed over the landfill. The cover design must meet the standards in WAC 173-303-
16 806(4)(h)(v) and WAC 173-303-665(6)(a). In addition, the permittees must comply with all the
17 post-closure requirements in WAC 173-303-665(6)(b).

18 It should be noted that the closure decision is made on a DWMU level. Thus, a different closure decision
19 can be made for each of the PUREX Tunnels.

20 11.5 **Interim Closure Activities**

21 The following sections describe activities supporting closure of the PUREX Storage Tunnels.

22 11.5.1 **Training Requirements**

23 Training requirements are described in Hanford Facility RCRA Permit (WA7890008967), Attachment 5,
24 *Hanford Facility Personnel Training Program*, and PUREX Storage Tunnels Addendum G, "Personnel
25 Training."

26 11.5.2 **Security**

27 Located within the 200 Area of the Hanford Facility, the PUREX Storage Tunnels must comply with
28 access control and warning sign requirements pursuant to WAC 173-303-310. Hanford Facility access is
29 controlled by 24-hour surveillance as described in the Hanford Facility RCRA Permit (WA7890008967)
30 Attachment 3, *Security*, and PUREX Storage Tunnels Addendum E, "Security."

31 11.5.3 **Preparedness, Prevention, and Emergency Procedures**

32 PUREX Storage Tunnels preparedness, prevention, and emergency procedures are described in Hanford
33 Facility RCRA Permit (WA7890008967) Attachment 4, *Hanford Emergency Management Plan*
34 (DOE/RL-94-02), and PUREX Storage Tunnels Addendum F, "Preparedness and Prevention."

35 11.5.4 **Inspections**

36 To prevent threats to human health and the environment during the extended closure period, the PUREX
37 Storage Tunnels will be inspected in accordance with WAC 173-303-320(2). Inspections will be
38 performed as described in Addendum I, "Inspection Requirements," until the final closure certification is
39 approved by the Department of Ecology (Ecology).

40

1
2
3
4

This page intentionally left blank.

Table 11-1 Washington Administrative Code 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 WAC 173-303-630 through 173-303-670, 40 CFR Subparts AA through CC, which are incorporated by reference at WAC 173-303-690 through 173-303-692, WAC 173-303-800 through 173-303-806, 40 CFR, Part 63 Subpart EEE (which is incorporated by reference at WAC 173-400-075(5)(a)), and 40 CFR, Part 146 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 PUREX Storage Tunnels will be managed and monitored in a manner that will ensure protection of human health and the environment.</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> <ul style="list-style-type: none"> (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; (ii) The hydrologic and geologic characteristics of the unit and the surrounding area; (iii) The existing quality of groundwater, including other sources of contamination and their cumulative impact on the groundwater; (iv) The quantity and direction of groundwater flow; (v) The proximity to and withdrawal rates of current and potential groundwater users; (vi) The patterns of land use in the region; (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; (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>The interim closure activity to grout the PUREX Storage Tunnels will prevent migration of dangerous waste constituents to the groundwater or subsurface environment below the tunnels during the extended closure period.</p>

Table 11-1 Washington Administrative Code 173-303-680(2) through (4) Requirements

Requirement	Method of Compliance
<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> <ul style="list-style-type: none"> (i) The volume and physical and chemical characteristics of the waste in the unit; (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.” 	<p>The interim closure activity to grout the PUREX Storage Tunnels will prevent migration of dangerous waste constituents to the soil under the tunnels. There are no surface waters or wetlands near the PUREX Storage Tunnels.</p>
<p>“(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:</p> <ul style="list-style-type: none"> (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 (vii) The potential for damage to domestic animals, wildlife, crops, vegetation, and physical structures caused by exposure to waste constituents.” 	<p>The interim closure activity to grout the PUREX Storage Tunnels will prevent migration of dangerous waste constituents to the air outside of the tunnels.</p> <p>During grouting, contamination control methods, such as plastic sleeving, will be used when penetrations to the tunnel are opened. As the grout flows into placement locations, air will be displaced by the grout. Portable ventilation systems described in Sections 11.5.5.3.3 and 11.5.6.3 collect and filter the displaced air to prevent the spread of contamination to the environment.</p>

Table 11-1 Washington Administrative Code 173-303-680(2) through (4) Requirements

Requirement	Method of Compliance
<p>“(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, WAC 173-303-320, 173-303-340(1), 173-303-390, and 173-303-64620 as well as meet any additional requirements needed to protect human health and the environment as specified in the permit.”</p>	<p>The stabilized tunnels will be maintained in a manner that prevents threats to human health and the environment and monitored through routine radiation surveillances, using radiation as an indication of contamination outside the stabilized tunnels.</p> <ul style="list-style-type: none"> • Inspections required by WAC 173-303-320 are conducted as described in Addendum I. • Preparedness and Prevention measures required by WAC 173-303-340(1) are described in Addendum F. • Facility Reporting required by WAC 173-303-390 is met in accordance with Hanford Facility RCRA Permit Conditions I.E.22 and II.B. • There have been no releases from the PUREX Storage Tunnels subject to Corrective Action requirements from WAC 173-303-64620.
<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 WAC 173-303-610(8) must specify the procedures that will be used to satisfy this requirement.”</p>	<p>A post-closure plan will be developed if required depending on the final closure option selected.</p>

1
 2

1
2
3
4

This page intentionally left blank.

1 **11.5.5 Interim Closure of Tunnel Number 1**

2 The response action to grout Tunnel Number 1 in accordance with Section J.4.5 of the PUREX Storage
3 Tunnels Contingency Plan and Permit Condition V.25.A.1 of the Hanford Facility RCRA Permit serves as
4 the interim closure action for Tunnel Number 1 and is described in the following sections. The tunnel
5 will be monitored and maintained during an extended closure period until final closure. Final closure
6 activities will be completed concurrent with remediation of the PUREX Plant as described in
7 Section 11.6.

8 **11.5.5.1 Interim Response Activities**

9 On May 9, 2017, workers discovered a collapse in a portion of the Tunnel 1 wood timber roof structure
10 resulting in a hole approximately 5.8 meters (19 feet) wide by 5.2 meters (17 feet) long. Immediate and
11 follow-on actions included the following:

- 12 • The Emergency Operations Center was activated to manage the immediate response to the event,
13 including response actions necessary to protect personnel (May 9).
- 14 • Informational notification was made to Ecology that the RCRA contingency plan was being
15 implemented, although no evidence of release from the unit was found (May 9).
- 16 • Fifty-three truckloads of soil fill were placed through the roof opening at the collapsed area to
17 provide contamination control, shielding, protection from ambient conditions, and stabilization of
18 the tunnel support walls (May 10).
- 19 • A temporary protective cover was installed over the full length of Tunnel 1 (May 20).
- 20 • A 15-day report was prepared and submitted to Ecology in compliance with Permit
21 Condition II.A.1 because the contingency plan was implemented (May 24).
- 22 • United States Department of Energy (USDOE) notified Ecology of its plan to address the
23 significant threat of further failure of Tunnel Number 1 by void filling the tunnel with grout
24 (May 31).
- 25 • Ecology approved the plan to grout Tunnel Number 1 as an interim stabilization measure for the
26 tunnel structure that will not preclude future closure or remedial decisions (June 8).
- 27 • Grouting was initiated on October 2 and completed on November 11.

28 The response action taken under the contingency plan performed the steps necessary to achieve interim
29 closure of Tunnel Number 1. The response action stabilized contaminated equipment by filling the tunnel
30 with engineered grout to improve tunnel stability, provide additional radiological protection, and increase
31 durability while not precluding any final closure actions. The following sections describe the technical
32 details of the response action taken for Tunnel Number 1.

33 **11.5.5.2 Records Review**

34 The structural evaluation conducted for Tunnel Number 1 reviewed tunnel drawings and specifications as
35 well as structural properties of the tunnel components and adjacent soil. The structural evaluation is
36 described in Chapter 4, "Process Information," Appendix 4A. Tunnel inventory as described in
37 Chapter 3, "Waste Analysis Plan," was also reviewed to identify dangerous waste constituents within
38 Tunnel Number 1.

39 **11.5.5.3 Site Preparation and Modifications Made Prior to Stabilization**

40 Figure 11-1 and Figure 11-2 show the layout and location for the grouting equipment in relation to Tunnel
41 Number 1. The piping system for grout injection was placed at the location of the roof collapse. Two
42 systems were provided, one servicing the south section of the tunnel (area from the location of the roof
43 opening where fill soil was added to the southern end of the tunnel) and one servicing the north section.
44 The individual pipes in each system were inserted into the top of the soil mound and routed underneath

1 the existing roof timbers bordering each side of the collapsed roof area. The mechanism for insertion of
2 the pipes was developed by mockup testing. Once the pipes were inserted, this area was backfilled with
3 soil to provide a 4 foot (nominal) covering over the area. The existing 4-inch and
4 1.5-inch-diameter tunnel roof penetrations were used for camera and lighting placement.

5 11.5.5.3.1 Piping System

6 Figure 11-3, Figure 11-4, and Figure 11-5 illustrate detail for the piping systems. Two systems were
7 required, one to service the north section of the tunnel and one for the south section. Each system
8 consisted of the following:

- 9 • Two 8-inch steel pipes for grouting.
- 10 • One 8-inch steel pipe for camera and lighting.
- 11 • One 8-inch steel pipe for passive ventilation.

12 Each individual pipe was inserted into a box embedded in the top of the fill soil mound and routed
13 underneath the existing roof timbers. Pipe ends terminated into the internal space of each tunnel section.

14 Once all piping was placed, thrust blocks of concrete were placed in the boxes, and soil was backfilled
15 over the area to a height of 4 feet (nominal) above the top of the existing roof timbers. Additionally,
16 concrete and grout were poured on the outside of the boxes to prevent the soil from collapsing into the
17 tunnel. The vertical load of the pipe was supported by the soil mound.

18 11.5.5.3.2 Work Platform

19 A work platform was placed across the east/west centerline of collapsed roof section. The work platform
20 facilitated the grouting operation, camera/light placement, and connection of the ventilation system.

21 Figure 11-1 and Figure 11-2 show the placement of the work platform in relation to Tunnel Number 1.

22 Figure 11-3 provides details of the work platform. The work platform met the following requirements:

- 23 • The platform was ground supported with 45-foot clear span and a 6-foot minimum wide working
24 area.
- 25 • The platform was designed in accordance with the 2012 International Building Code (IBC) with a
26 uniform live loading of 100 pounds per square foot with two 1,000-pound concentrated loads
27 applied at midspan (one on each side of the platform).
- 28 • The platform was designed for end bearing condition based on 1,500 pounds per square foot
29 allowable soil-bearing pressure.
- 30 • The platform included a guardrail system along each side designed in accordance with 2012 IBC
31 provisions for non-public access with openings that prevent passage of a 21-inch-diameter sphere.

32 11.5.5.3.3 Ventilation System

33 Passive ventilation was provided during the grouting operation to control contamination in accordance
34 with the Washington Department of Health License (EU 1471 NOC 1262 for Tunnel Number 1)
35 conditions and limitations. Figure 11-6 shows details of the High-Efficiency Particulate Air (HEPA) filter
36 skid and assembly. The passive ventilation HEPA filter skids were located to one side of the tunnel berm
37 and connected to the piping vent pipe with flex hose. Displaced air from the tunnel was routed via the
38 vent pipe through a HEPA filter. Condensate from displaced air was collected prior to the inlet of the
39 filter.

40 11.5.5.4 Stabilization Activities

41 Grouting of Tunnel Number 1 was conducted in October and November 2017. The grout used and the
42 actions taken to stabilize the tunnel are described in the following sections.

1 11.5.5.4.1 **Grout Design**

2 During development of the grout design, the Waste Encapsulation and Storage Facility (WESF) Hot Cell
 3 A through F grouting project was reviewed to identify lessons learned that were applicable to grouting the
 4 PUREX tunnels. The differences in how the grout was inserted and the spaces to fill proved to be the
 5 major difference between the WESF and PUREX tunnel grouting activities. The WESF grout
 6 formulation demonstrated desirable characteristics that matched tunnel grout fill design requirements.
 7 Minor modifications were made to reduce cement content while maintaining overall cementitious
 8 materials (cement plus fly ash) content to reduce compressive strength and heat of hydration while
 9 maintaining stable and uniform batching and placement behavior characteristics. The grout was tested
 10 using a mockup facility to verify performance. In addition, tests were conducted to determine when the
 11 compressive strength of a grout lift was sufficient to allow the next lift to be poured. Testing
 12 demonstrated that 1-day curing time was adequate.

13 The standard grout formulation used in Tunnel Number 1 was established after mockup testing and is
 14 shown in Table 11-2. The grout was a flowable, nonaggregate void-filling grout formulated to meet the
 15 functional requirements listed below.

- 16 • The grout will be able to flow easily to the extent of the tunnel length and flow into open spaces
 17 in and between rail cars and equipment.
- 18 • The grout will minimize the amount of heat generated during curing.
- 19 • The target range of minimum compressive strength is 1200 to 2000 pounds per square inch after
 20 28 days.
- 21 • The grout will provide extended placement time (typically a minimum of 3 hours) to facilitate
 22 batching and placement during construction.

23

Table 11-2 Standard Grout Formulation

Constituent	Quantity (per yard)
Sand	2,105 lb
Type III cement	374 lb
Fly ash	796 lb
Water	56 gal
Viscosity-modifying admixture	60 oz
Hydration-controlling admixture	60 oz
Water-reducing admixture	22 oz
Workability-retaining admixture	22 oz

24

25 The grout will have sufficient strength to provide structural support for the Tunnel. The formula was
 26 developed to also allow it to be cut using a diamond wire saw or other technology if Clean Closure is
 27 selected as the final closure action.

28 Minor adjustments were made to the contents as needed based on factors such as weather conditions and
 29 location in the tunnel to achieve functional requirements. A quality assurance testing program was used
 30 to ensure that the grout used for Tunnel Number 1 complied with project specifications. Engineering and
 31 laboratory-scale testing was performed to confirm that the grout formulation met the performance criteria
 32 prior to the addition of grout to PUREX Tunnel Number 1. Field inspection and testing was performed
 33 during the grouting operation. A minimum of one set of grout samples (two cylinders) was cast and tested

1 for every 170 cubic yards of grout placed per day. Samples were taken from randomly selected trucks.
2 Visual inspection of each truck was performed by the structural engineer (or designated representative) to
3 visually confirm grout flowability characteristics were consistent with grout batch test results. Testing
4 was performed in accordance with:

- 5 • ASTM C1611, *Standard Test Method for Slump Flow of Self-Consolidating Concrete*.
- 6 • ASTM C1064, *Standard Test Method for Temperature of Freshly Mixed Hydraulic-Cement*
7 *Concrete*.
- 8 • ASTM C138, *Standard Test Method for Density (Unit Weight), Yield, and Air Content*
9 *(Gravimetric) of Concrete*.
- 10 • ASTM C39, *Standard Test Method for Compressive Strength of Cylindrical Concrete Specimens*.

11 11.5.5.4.2 Evaluations Conducted During Design

12 The grout design process included several evaluations to determine how well the grout would perform
13 under conditions expected at PUREX.

14 Over long time periods, concrete structures may degrade as a result of exposure to ionizing radiation.
15 A conservative calculation has been performed that shows that the time frame necessary for the
16 recognized cumulative exposure threshold associated with concrete degradation is greater than 110 years.
17 A more realistic, yet still conservative, calculation conducted for WESF Hot Cells A through F closure
18 shows that the time frame necessary to reach a radiation exposure of concern is in excess of 590 years
19 (CHPRC-02499, *W-130 Project Calculation: Estimate of Impacts to Grout as a Result of Radiation*
20 *Exposure*). Radiation fields in the PUREX Storage Tunnels are much lower than those encountered in the
21 WESF Hot Cells. No significant degradation of grout due to radiation exposure in the near time frame is
22 expected.

23 Grout can also be affected by exposure to high temperature. The grout design limits temperatures due to
24 heat of hydration to 160°F, which will not negatively affect the grout or structural concrete. Potential
25 impacts to the grout as a result of heat of hydration and decay heat have been evaluated (CHPRC-02499),
26 and there are no deleterious effects.

27 11.5.5.4.3 Grout Delivery

28 Grout was prepared offsite and trucked to Tunnel Number 1. Figure 11-7 includes a site plan for the
29 grouting operations. Grout samples were collected and tested during daily placements. A grout pump
30 vehicle was placed on the west side of the tunnel entrance.

31 After equipment installation, the grouting was performed by connecting a grouting pipe from the grout
32 pumping vehicle to the pipe system. Addition of the grout into each section of the tunnel displaced air
33 from the tunnel. The displaced air was routed through a flex hose to the HEPA filter skids described in
34 Section 11.5.5.3.3. A second skid, collocated next to the primary filter skid, served as backup.

35 Cameras with lighting were used to monitor the progress of the fill and to provide visual confirmation that
36 the spaces being grouted were filled to maximum extent possible. A temporary washout pit was set up to
37 the south of PUREX along PUREX Drive and was part of the exit route for the delivery vehicles.

38 11.5.5.4.4 Grout Placement

39 Placement of grout began at the location of the roof collapse and subsequent soil fill. This location
40 allowed both ends of the tunnel on either side of the soil fill to be grouted from a single point. Each
41 section of the tunnel (north and south) used a dedicated piping arrangement to facilitate grouting. The
42 sequence for grouting is described below.

43 The grout in the south end of the tunnel was placed in a series of lifts to prevent the equipment on the
44 railcars from floating. The initial pours were approximately 1 to 2 feet of grout to reach from the floor to

1 the bottom of the railcars. The initial pours were allowed to set up before additional grout was added.
2 Subsequent lifts locked the equipment in place on the railcars. The final additions of grout were
3 conducted to totally encapsulate the equipment and fill the south end to the maximum extent practicable.

4 The grout in the north section of the tunnel was placed in 1- to 2-foot lifts. This was done to capture the
5 equipment on the rail cars and also to limit the hydraulic pressure on the seals of the water-fillable door.
6 The grout additions continued in small increments until all of the equipment was covered in grout and the
7 north section was filled to the maximum extent practicable.

8 Grout was distributed from the grout pump vehicle located west of the tunnel. Valves were used at the fill
9 connections to enable quick shutoff of grout once the volume is filled. As grout flowed into the tunnel,
10 air was displaced by the grout. The displaced air contained water vapor and was considered potentially
11 radioactively contaminated. To control contamination during grouting, portable ventilation systems,
12 described in Section 11.5.5.3.3, were used to collect and filter the displaced air. A total of 4,396 cubic
13 yards of grout was placed into Tunnel 1. This totally encapsulated the equipment to within approximately
14 6 inches from the roof timbers.

15 The work platform and ventilation equipment were removed after grouting was completed and soil fill
16 was placed in the area to match the profile of existing tunnel soil cover. The piping system and camera
17 and lighting components added on to the existing tunnel penetrations were abandoned in place.

18 11.5.6 **Interim Closure of Tunnel Number 2**

19 Interim closure of Tunnel Number 2 will be completed as described in the following sections. Following
20 completion of interim closure, an extended closure period will commence and the tunnel will be
21 monitored and maintained until final closure.

22 11.5.6.1 **Records Review**

23 The structural evaluation conducted for Tunnel Number 2 reviewed tunnel drawings and specifications as
24 well as structural properties of the tunnel components and adjacent soil. The structural evaluation is
25 described in Chapter 4, "Process Information," Appendix 4B. Tunnel inventory as described in
26 Chapter 3, "Waste Analysis Plan," was also reviewed to identify dangerous waste constituents within
27 Tunnel Number 2.

28 11.5.6.2 **Site Preparation**

29 The Tunnel Number 2 area will be prepared to enable the safe insertion of the engineered grout while
30 limiting the risks to the workers and the environment. Roads required for the grout trucks will be
31 prepared to provide a stable platform to deliver the grout. The path of the trucks will be designed to limit
32 the potential for interfering with the normal traffic patterns of the area. A site plan for Tunnel Number 2
33 activities is shown in Figure 11-8.

34 Additionally, investigative work was performed to verify the assumptions utilized in the engineering
35 design process. This included removing a 3-inch plug in an existing 30-inch tunnel riser plug to enable
36 samples to be taken in the interior of the tunnel and ensuring the main plug can be removed. These
37 samples included industrial hygiene (e.g., flammable gas, volatile organics, or hazardous materials) and
38 radiological samples to determine the status of the atmosphere and the potential for radiation exposure
39 from both direct radiation and airborne. The 30-inch plugs on the risers that will be utilized for grout
40 insertion were pulled and put back in place to confirm the plugs could be removed. The investigation also
41 revealed that the length and configuration of some of the railcars was different than previously assumed.
42 The artist's rendition of Tunnel Number 2, shown in Figure 4-2 and Figure 11-11, show the updated
43 configuration.

1 11.5.6.3 **Modifications Made Prior to Stabilization**

2 Modifications will be required to prepare the tunnel for the insertion of the grout. Plugs in existing riser
3 positions that will be utilized during the grouting process will be removed. The plug will then be replaced
4 with an engineered replacement to allow grout insertion as well as provide locations for cameras and
5 necessary lighting (Figure 11-9 and Figure 11-10). Work on the tunnel is being done using lifts and
6 cranes. No work platform is required.

7 Additionally, a riser will be modified to connect the ventilation system to capture the air expelled from the
8 tunnel during the grouting activities. Projected riser locations for cameras, lighting, and ventilation
9 equipment are shown in Figure 11-11.

10 A passive ventilation system skid similar to that used for Tunnel Number 1 will be utilized to filter air
11 discharged from the tunnel during grouting (Figure 11-6). The system will be designed and licensed in
12 accordance with the Hanford Site Air Operating Permit (AOP 00-05-006).

13 11.5.6.4 **Stabilization Activities**

14 The stabilization activities for Tunnel Number 2 are described in the following sections. To the extent
15 possible, materials and process used for stabilization of Tunnel Number 1 will be used for Tunnel
16 Number 2.

17 11.5.6.4.1 **Grout Design**

18 The grout design that will be utilized for Tunnel Number 2 will be similar to the grout that was utilized in
19 Tunnel Number 1 with the only difference being Type I/II cement will be utilized in Tunnel 2 instead of
20 Type III. Functional requirements and formulation of the grout is shown in Section 11.5.5.4.1.

21 11.5.6.4.2 **Grout Delivery**

22 The grout will be delivered through the modified riser plugs located along the top of the tunnel. To
23 prevent loading the top of the tunnel, the piping will be a goose-neck type delivery system located off the
24 tunnel surface (Figure 11-12). The piping will be connected to the modified riser plug shown in
25 Figure 11-9 and Figure 11-10 utilizing industrial concrete rubber hose. The projected location for grout
26 insertion is shown in Figure 11-11. This will limit the load on the tunnel while enabling the grout
27 insertion into the tunnel.

28 11.5.6.4.3 **Grout Placement**

29 It is estimated that Tunnel 2 will require approximately 43,000 cubic yards to stabilize. The grout will be
30 placed in the tunnel in layers. The layers will be small enough to prevent the possibility of creating a
31 buoyant force to lift the equipment on the railcars in the tunnel. It will be delivered in multiple locations
32 to ensure the grout flows and covers the entire tunnel.

33 A ventilation skid with a passive HEPA filter system will be connected to one of the risers. This will
34 enable the air in the tunnel to escape through a filtered media to prevent the release of airborne
35 contamination. The skid will have equipment to collect the condensate from the system.

1 During the evolution to grout the tunnel, standard radiological controls will be utilized to prevent the
2 release and/or spread of contamination. This may include the use of sleeving, glovebags, negative air
3 machines, etc. The type of control will be selected based on the risk of the work being performed and the
4 potential for a release. Quality control testing will be conducted during grout placement in the same
5 manner used for Tunnel Number 1 as described in Section 11.5.5.4.1. Grout that does not meet the grout
6 design standards listed in Section 11.5.5.4.1 will be returned to the vendor and will not be used for the
7 tunnel.

8 11.6 Final Closure Activities

9 Final closure of the PUREX Storage Tunnels will be coordinated with closure/remediation of the PUREX
10 Plant in accordance with the [Hanford Federal Facility Agreement and Consent Order](#) (HFFACO or
11 Tri-Party Agreement [TPA]), Section 5.5. The final closure decision for the PUREX Storage Tunnels will
12 be deferred until the *Comprehensive Environmental Response, Compensation, and Liability Act of 1980*
13 (CERCLA) remedial action for the 200-CP-1 Operable Unit because the close proximity of the two
14 facilities will impact the final disposition of each facility. Coordination of the RCRA unit closure and
15 the CERCLA operable unit investigation and remediation is necessary to prevent overlap and duplication
16 of work.

17 The CERCLA remedial investigation process will be initiated in accordance with the schedule established
18 in TPA Milestone M-085-80. The nature and extent of contamination and alternatives to mitigate risks to
19 human health and the environment will be evaluated in a CERCLA feasibility study.

20 A feasibility study evaluates alternatives for compliance with applicable or relevant and appropriate
21 requirements, including substantive closure requirements defined in WAC 173-303-610. A CERCLA
22 proposed plan identifies a preferred alternative for remediation and is submitted for public comment in
23 accordance with the Hanford Public Involvement Plan
24 (http://www.hanford.gov/files.cfm/FacAgreementand-Consent-Order_FINAL.pdf). Following
25 consideration of public comment, a ROD documents the selected remedial alternative. A remedial
26 design/remedial action work plan documents the design and schedule for remediation activities.

27 USDOE will work with Ecology to integrate the CERCLA decision information as it becomes effective
28 into the closure plan. The final closure plan will meet the requirements of WAC 173-303-140 and
29 WAC 173-303-610. Potential final closure options for the PUREX Storage Tunnels are described in
30 Sections 11.6.1 and 11.6.2. These options may be modified and additional options may be developed
31 based on the remedial investigation results and the examination of available technologies.

32 11.6.1 Retrieval/Clean Closure Options

33 As part of an interim stabilization measure in response to a collapse event discovered by workers on
34 May 9, 2017, Tunnel Number 1 was filled with grout to improve tunnel stability, provide additional
35 radiological protection, and increase durability while not precluding final closure actions. Because of the
36 threat of future failure of Tunnel Number 2, interim closure activities are being taken to stabilize Tunnel
37 Number 2 with grout.

38 Clean closure by retrieval could be implemented if the results of the decision-making process determine
39 that it is practicable, protective of human health and the environment, and in compliance with applicable
40 regulations. If clean closure is the selected option, the closure action might consider but will not be
41 limited to the options described in Sections 11.6.1.1, 11.6.1.2, and 11.6.1.3. These options could be
42 modified based on the remedial investigation results and the examination of available technologies.

1 **11.6.1.1 Retrieval and Disposal in the PUREX Plant**

2 In this option, railcars and grout in both tunnels would be retrieved after excavation of the tunnel by
3 cutting and removal using water jets, wire saws, excavation equipment, or other technologies. A detailed
4 excavation plan, including specific cut locations, would be developed as part of the final
5 remediation/closure evaluation described in Section 11.6. Waste material would be moved from the
6 tunnels to the PUREX Plant canyon deck area or an alternate location if disposal in the plant is the
7 selected alternative. Waste such as empty railcars that could not be placed in the PUREX Plant for
8 disposal (e.g., insufficient space) would be removed for final disposition at other approved disposal
9 facilities.

10 Final disposition of the waste transferred to the plant, including characterization or size reduction as
11 needed as well as disposition of the tunnel structure, would be completed as part of the coordination with
12 the 200-CP-1 Operable Unit remedial action. Closure activities would be conducted in compliance with
13 applicable WAC requirements. The excavation plan and waste disposition processes would be developed
14 to ensure that the silver nitrate contained in Tunnel Number 2 is not exposed to conditions that would
15 cause it to ignite and that mercury contained in Tunnel Number 2 is not released to the environment.
16 Verification sampling would be performed in accordance with an approved sampling and analysis plan.

17 **11.6.1.2 Retrieval and Physical Processing (Size Reduction) in the PUREX Plant and**
18 **Subsequent Disposal**

19 In this option, retrieval of waste material stored in the tunnels would be similar to that described in the
20 previous section if physical processing in the plant and disposal elsewhere is the selected alternative in the
21 remedial action decision for the 200-CP-1 Operable Unit. Once the waste material was transferred to the
22 PUREX Plant canyon deck area or alternate location within the plant, characterization and size reduction
23 of waste material would proceed as needed. An area located on the canyon deck, in a process cell, or in
24 an alternate location would be modified to include all necessary equipment to perform characterization,
25 size reduction, and packaging activities. Size reduction would be performed through various technologies
26 that include but are not limited to flame cutting, water jet cutting, sawing, or other technologies.

27 Final disposition of the processed waste material either onsite or offsite, as well as disposition of the
28 tunnel structure, would be completed as part of the coordination with the 200-CP-1 Operable Unit
29 remedial action. Closure activities would be conducted in compliance with applicable WAC
30 requirements. The excavation plan and waste disposition processes would be developed to ensure that the
31 silver nitrate contained in Tunnel Number 2 is not exposed to conditions that would cause it to ignite and
32 that mercury contained in Tunnel Number 2 is not released to the environment. Verification sampling
33 would be performed in accordance with an approved sampling and analysis plan

34 **11.6.1.3 Construction of a New Facility for Retrieval, Processing, and Treatment of**
35 **Equipment for Disposal**

36 This option involves the construction of a new facility that is either mobile or stationary to remove and
37 treat waste material stored in the tunnels. The facility would be constructed in a manner consistent with
38 the retrieval and handling requirements for large, contaminated waste material. Retrieval of the waste and
39 grout from Tunnel Numbers 1 and 2 could involve cutting and removal using water jets, wire saws,
40 excavation equipment, or other technologies. Following retrieval, treatment and disposition of the waste
41 material, as well as disposition of the tunnel structure, would be completed as part of the coordination
42 with the 200-CP-1 Operable Unit remedial action.

1 Closure activities would be conducted in compliance with applicable WAC requirements. The excavation
2 plan and waste disposition processes would be developed to ensure that the silver nitrate contained in
3 Tunnel Number 2 is not exposed to conditions that would cause it to ignite and that mercury contained in
4 Tunnel Number 2 is not released to the environment. Verification sampling would be performed in
5 accordance with an approved sampling and analysis plan.

6 11.6.2 **In Situ Disposal (Landfill Closure)**

7 As part of an interim stabilization measure in response to a collapse event discovered by workers on
8 May 9, 2017, Tunnel Number 1 was filled with grout to improve tunnel stability, provide additional
9 radiological protection, and increase durability while not precluding final closure actions. Because of the
10 threat of future failure of Tunnel Number 2, interim closure activities are being taken to fill Tunnel
11 Number 2 with grout.

12 In situ disposal (landfill closure) of Tunnel Numbers 1 and 2 could be implemented if the results of the
13 decision-making process determine that landfill disposal of the stored waste is protective of human health
14 and the environment and in compliance with applicable regulations. If in situ disposal (landfill closure) is
15 the selected option, the closure action might consider but will not be limited to the option described in
16 Section 11.6.2.1. This option could be modified based on the remedial investigation results and the
17 examination of available technologies.

18 11.6.2.1 **Maintain Grout and Install Landfill Cover**

19 This option would involve maintaining the grout fill placed in Tunnel Numbers 1 and 2 as part of the
20 interim stabilization/interim closure measures described in Sections 11.5.5 and 11.5.6. At final closure,
21 remaining external equipment (e.g., risers or monitoring equipment) would be removed from the tunnel
22 surface if necessary. Final closure activities would comply with applicable WAC requirements for landfill
23 closure, including construction of a surface barrier that meets RCRA landfill cover requirements to
24 prevent water from leaching mixed waste contained in the tunnels. Final landfill cover design and
25 installation would be completed as part of the coordination with the 200-CP-1 Operable Unit remedial
26 action.

27 11.6.3 **Identifying and Managing Contaminated Media**

28 If contaminated media removal is required during final closure, it will be managed as a newly generated
29 waste stream in accordance with WAC 173-303-610(5). The contaminated media must be handled in
30 accordance with all applicable requirements of WAC 173-303-170 through WAC 173-303-230,
31 containerized, labeled, characterized in accordance with WAC 173-303-070 requirements, designated as a
32 dangerous or non-dangerous waste, stored, and transported to an appropriate disposal facility. It will be
33 treated (if necessary) to meet Land Disposal Restriction requirements in 40 CFR 268, incorporated into
34 WAC 173-303-140(2)(a) by reference, then ultimately disposed.

35 11.6.4 **Role of Independent Qualified Registered Professional Engineer**

36 An Independent, Qualified, Registered Professional Engineer (IQRPE) will be retained to provide
37 certification of final closure, as required by WAC 173-303-610(6). The IQRPE will be responsible for
38 observing field activities and reviewing documents associated with closure of the PUREX Storage
39 Tunnels.

40 The IQRPE will perform a number of field activities. However, these field activities are dependent on the
41 closure decision and will be defined when the closure decision has been made.

42 The IQRPE will record his or her observations and reviews in a written report that will be retained in the
43 operating record. The resulting report will be used to develop the closure certification, which will then be
44 provided to Ecology.

1 **11.6.5 Certification of Closure**

2 In accordance with WAC 173-303-610(6), within 60 days of completing final closure activities for the
3 PUREX Storage Tunnels, certification that closure activities have been completed in accordance with the
4 approved closure plan will be submitted to Ecology by registered mail or other means that establish proof
5 of receipt (including applicable electronic means). The certification will be signed by the owner or
6 operator and signed and certified by an IQRPE. Information supporting IQRPE closure certification will
7 be submitted upon request by Ecology.

8 **11.6.6 Conditions that will be Achieved when Closure is Complete**

9 Depending on the final closure decision, the PUREX Storage Tunnels will be demolished, and
10 components removed and disposed, or they will be closed as a landfill with a surface barrier that meets
11 RCRA landfill cover requirements.

12 **11.7 Closure Schedule and Time Frame**

13 Preparation for and implementation of interim closure activities are being completed to target start of
14 stabilization of Tunnel Number 2 in 2018. Final closure activities for the PUREX Storage Tunnels will
15 take place in conjunction with the remedial actions for the PUREX Plant and the 200-CP-1 Operable
16 Unit. It is anticipated that a number of years will elapse before remedial actions for the PUREX Plant can
17 be initiated. The first step in the remedial action process – developing a draft remedial
18 investigation/feasibility study work plan – is subject to TPA Milestone M-085-80.

19 Continued storage of dangerous waste in the tunnels will necessitate an extension to the 180 days to
20 complete final closure activities required in WAC 173-303-610(4)(b). This extension is being requested
21 in accordance with WAC 173-303-610(4)(b)(i). Stabilization of the PUREX Storage Tunnels with grout
22 as described in Sections 11.5.5 and 11.5.6 mitigates the potential for exposing workers to dangerous
23 wastes or releasing dangerous wastes into the environment until final closure can be completed.

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

27 During this extended closure period, the Hanford Facility will comply with all applicable requirements of
28 the permit. Additionally, the PUREX Storage Tunnels will be maintained in a manner that prevents
29 threats to human health and the environment. Interim closure activities will be initiated within 60 days
30 after receipt of approved permit. Interim closure activities and extended closure period expected
31 durations are outlined in the closure activities schedule in Table 11-3.

32

Table 11-3 PUREX Storage Tunnels Closure Activities Schedule

Activity Description	Expected Duration/Date
Interim Closure of Tunnel Number 2	
Preparation (construction of piping systems, ventilation system, etc.)	5 months
Grouting	6 months
Submit interim closure report	60 days after interim closure activities complete
Extended Closure Period	
Extended closure period deferring closure to be concurrent with remedial action of PUREX Plant and 200-CP-1 Operable Unit, including continued surveillance and inspection	To be determined

Table 11-3 PUREX Storage Tunnels Closure Activities Schedule

Activity Description	Expected Duration/Date
Initiate remedial action process (TPA M-085-80, <i>Submit Remedial Investigation/Feasibility Study Work Plan for 200-CP-1 to Ecology</i>)	9/30/2020
Implementation of final closure decision (clean closure or landfill closure)	To be determined
Completion of Closure Activities	
Submit final closure certification	60 days after final closure activities complete
Post-Closure (if required)	
Groundwater monitoring and reporting	As required by post-closure plan
Maintenance and monitoring of waste containment systems	As required by post-closure plan

1

2 **11.8 Cost of Closure**

3 A detailed written estimate outlining updated projections of anticipated closure costs for the Hanford
4 Facility treatment, storage, or disposal units having final status is not required per Permit Condition II.H.

5 **11.9 References**

6 ASTM C39/C39M-17b, 2017, *Standard Test Method for Compressive Strength of Cylindrical Concrete*
7 *Specimens*, ASTM International, West Conshohocken, Pennsylvania. Available at:
8 <https://www.astm.org/Standards/C39.htm>.

9 ASTM C138/C138M-17a, 2017, *Standard Test Method for Density (Unit Weight), Yield, and Air Content*
10 *(Gravimetric) of Concrete*, ASTM International, West Conshohocken, Pennsylvania. Available
11 at: <https://www.astm.org/Standards/C138.htm>.

12 ASTM C1064/C1064M-17, 2017, *Standard Test Method for Temperature of Freshly Mixed*
13 *Hydraulic-Cement Concrete*, ASTM International, West Conshohocken, Pennsylvania. Available
14 at: <https://www.astm.org/Standards/C1064.htm>.

15 ASTM C1611/C1611M-14, 2014, *Standard Test Method for Slump Flow of Self-Consolidating Concrete*,
16 ASTM International, West Conshohocken, Pennsylvania. Available at:
17 <https://www.astm.org/Standards/C1611.htm>.

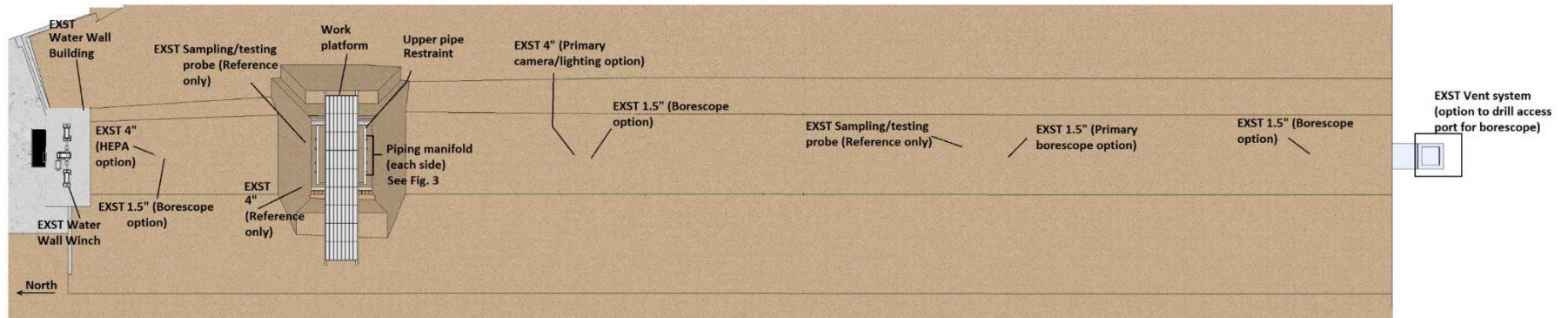
18 CHPRC-02499, 2015, *W-130 Project Calculation: Estimate of Impacts to Grout as a Result of Radiation*
19 *Exposure*, Rev. 0, CH2M HILL Plateau Remediation Company, Richland, Washington.

20 2012 International Building Code, International Code Council, May 2011. Available at:
21 http://tyrone.org/wp-content/uploads/2017/05/icc.abc_.2012.pdf.

22

1
2
3
4

This page intentionally left blank.



1
2
Figure 11-1 Plan View of Tunnel Number 1 with Equipment Placement and Layout

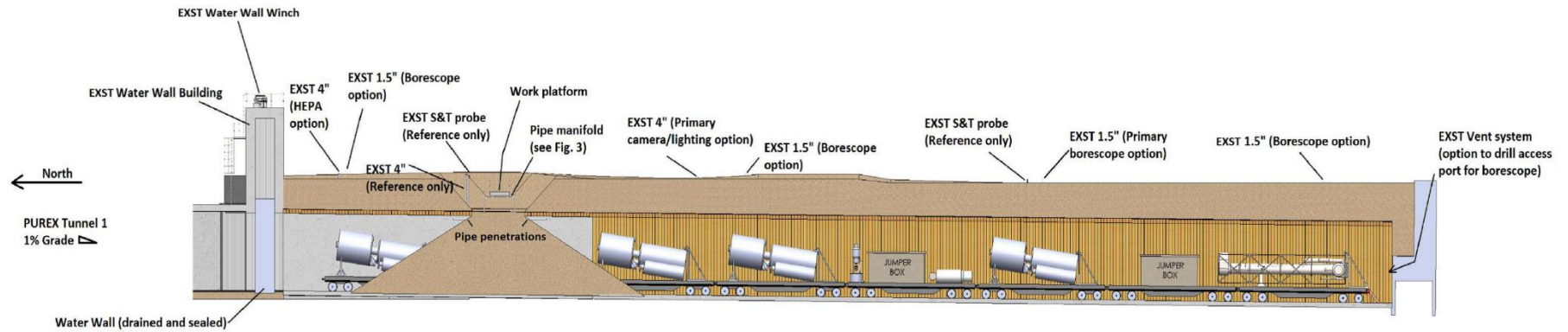
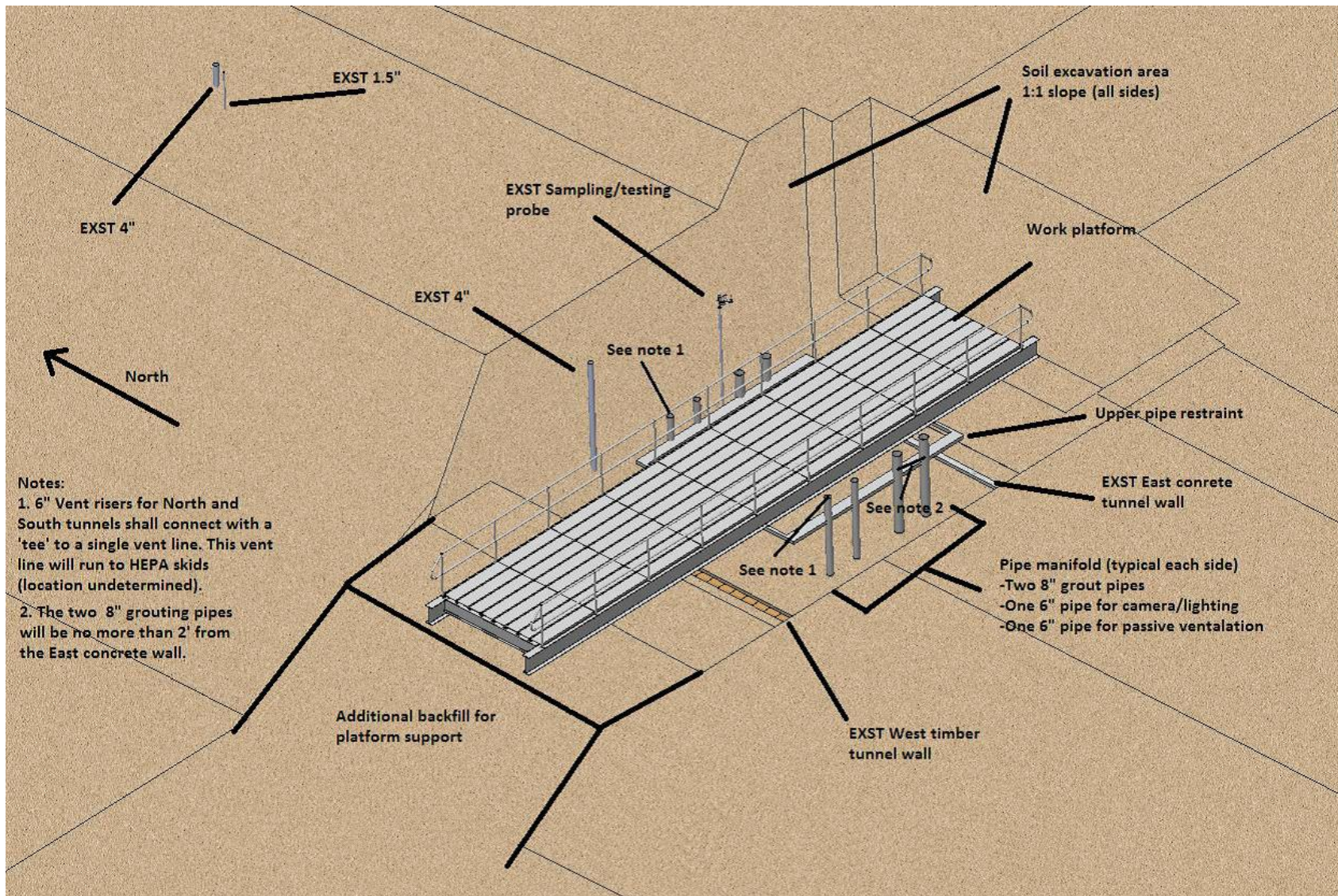


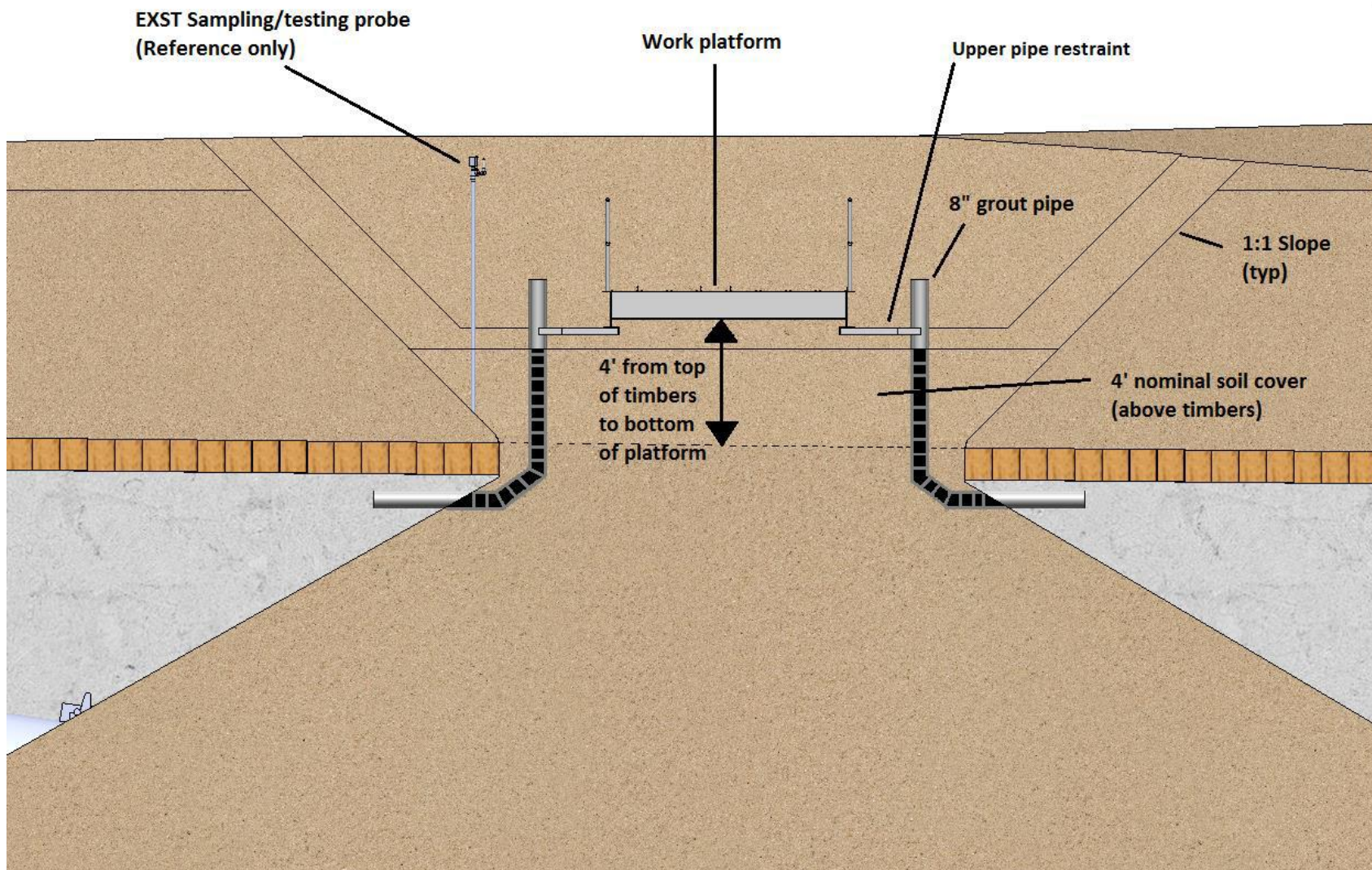
Figure 11-2 West Elevation of Tunnel Number 1 with Equipment Placement

- 1
- 2 Note: Water wall refers to the water-fillable door.
- 3



1 **Figure 11-3 Isometric of Tunnel Number 1 Grouting Equipment – Platform and Piping Arrangement**

2



1
2
Figure 11-4 West Elevation of Tunnel Number 1 Grouting Equipment – Platform and Piping

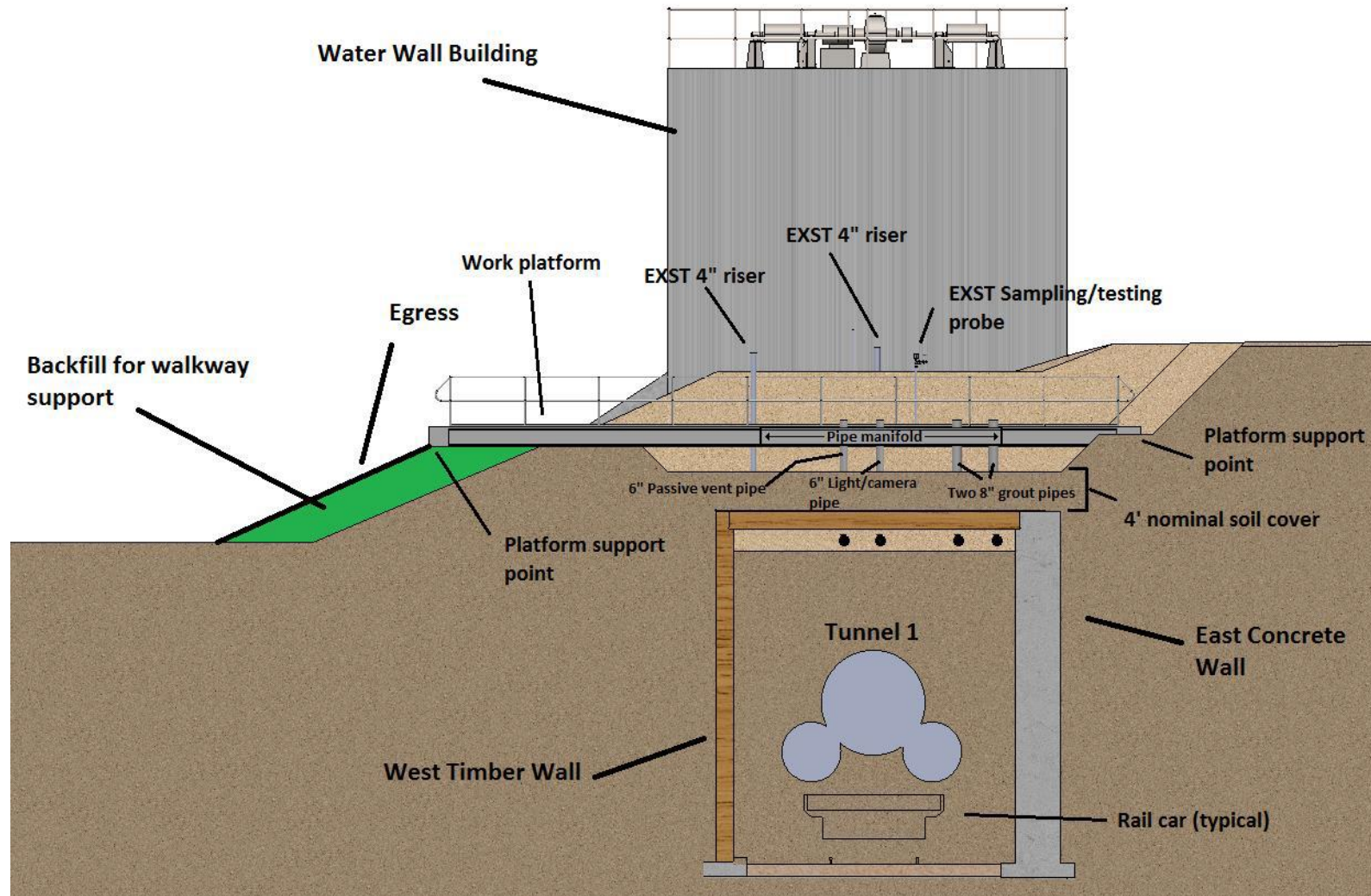
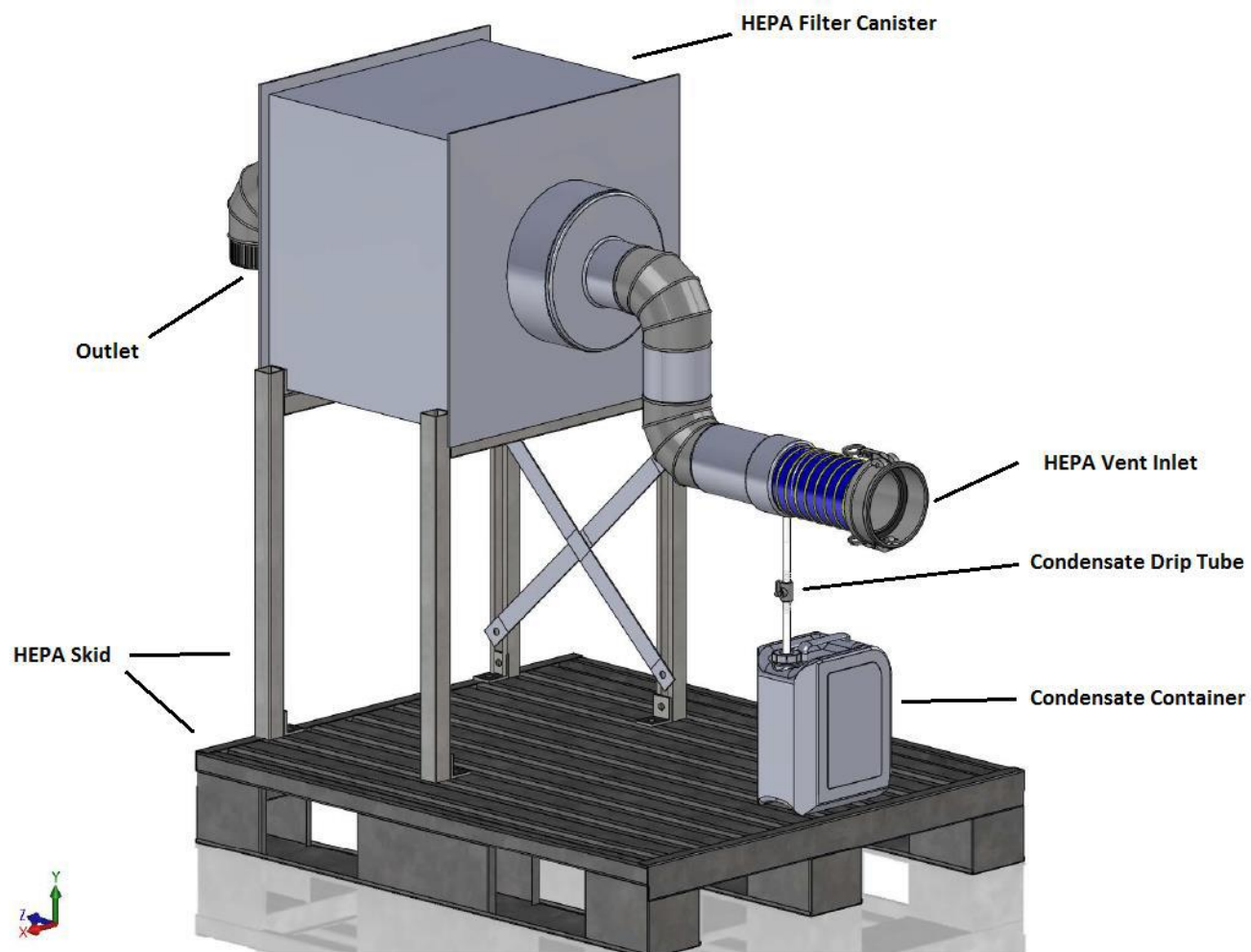


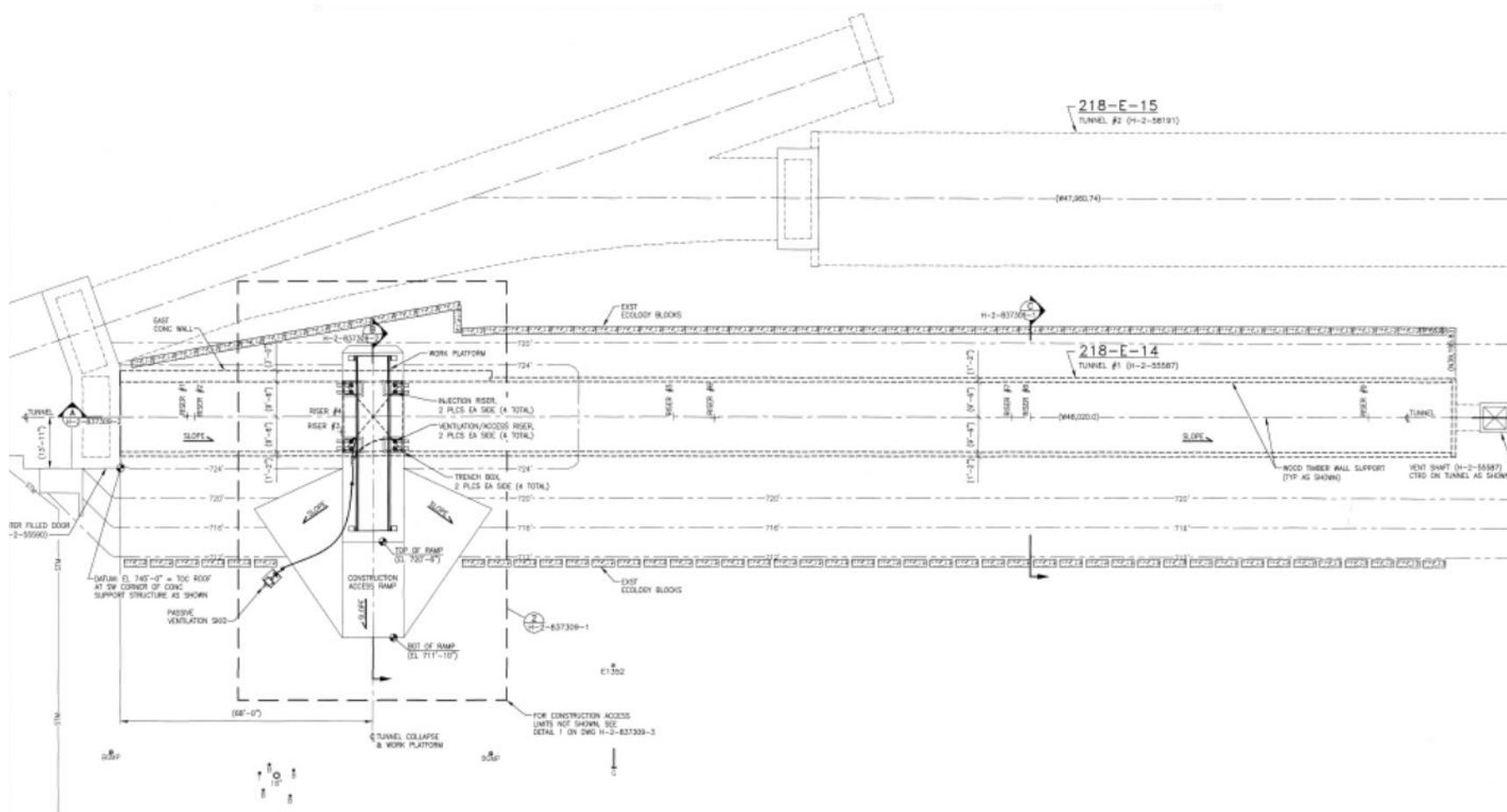
Figure 11-5 South Elevation of Tunnel Number 1 Grouting Equipment – Platform and Piping

- 1
- 2 Note: Water wall refers to the water-fillable door.
- 3



1
2

Figure 11-6 Passive Ventilation Filter Assembly for Tunnel Number 1



1
 2

Figure 11-7 Tunnel Number 1 Site Plan

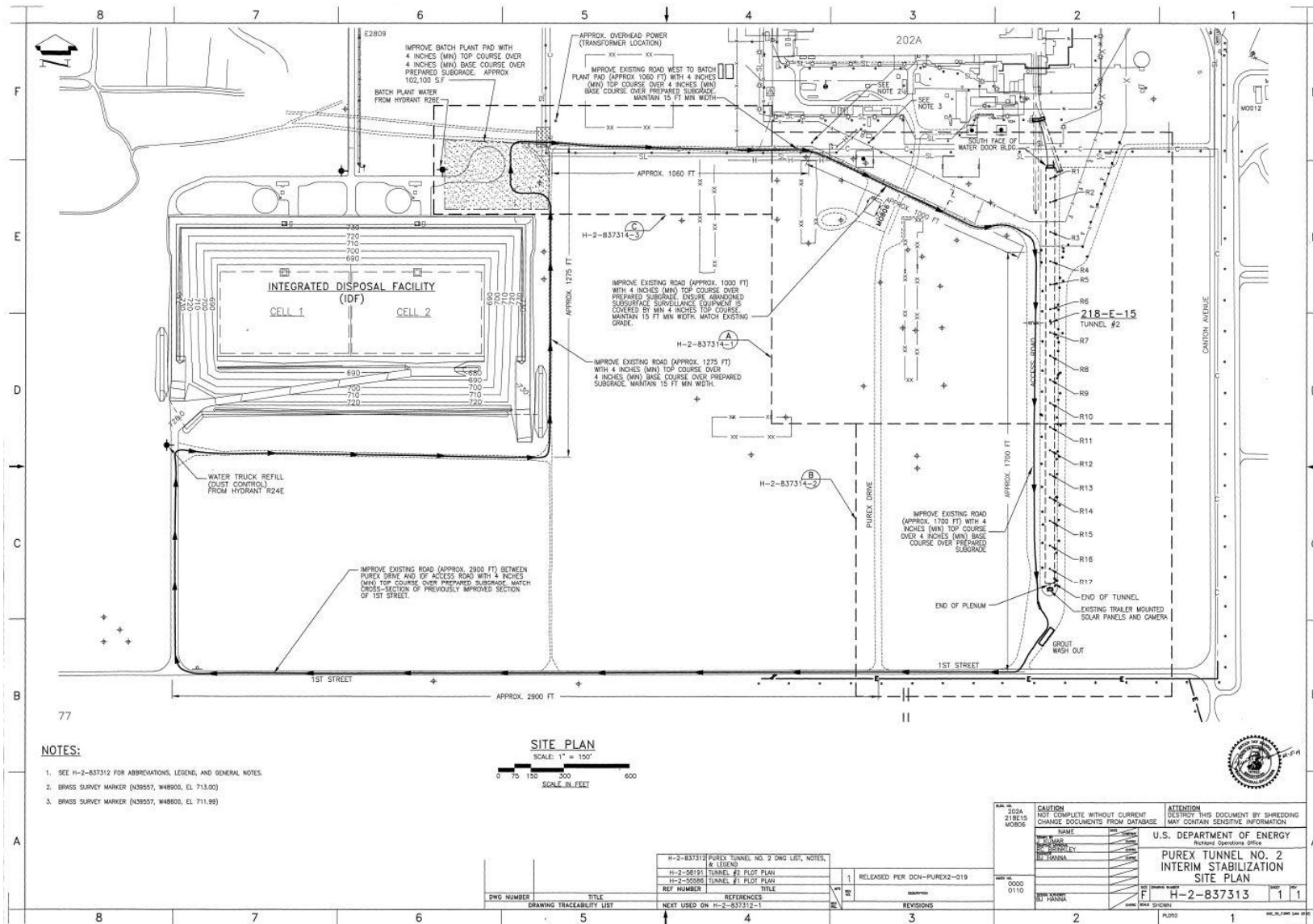
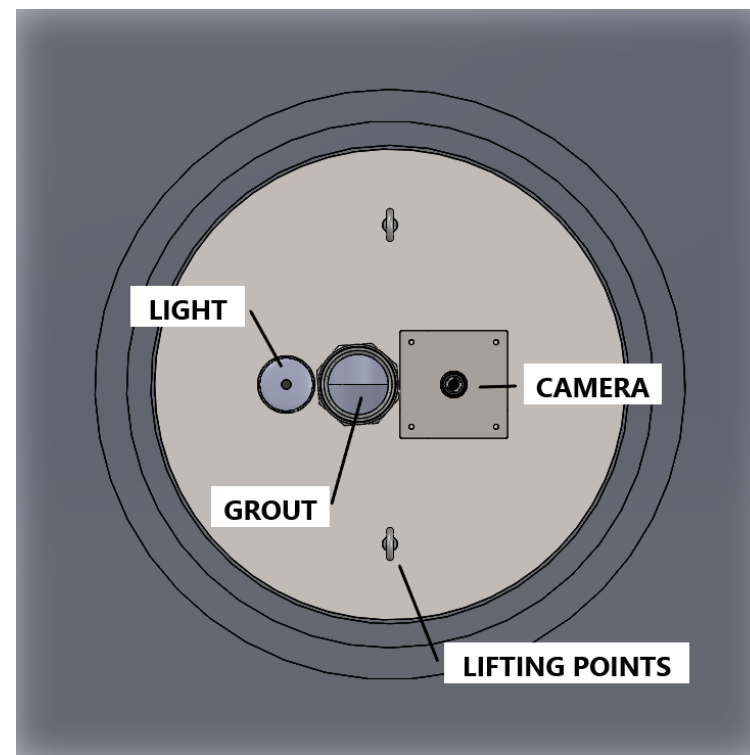
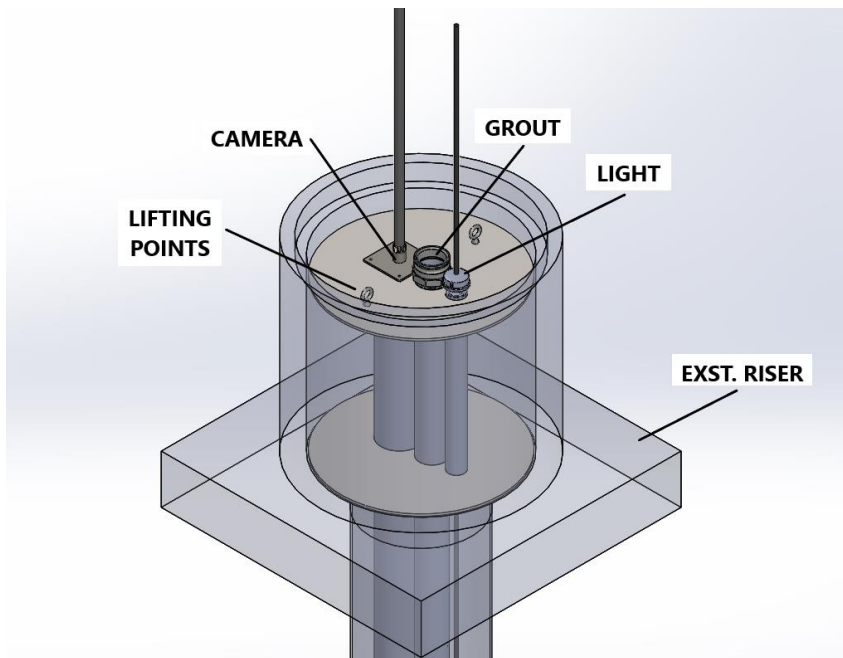
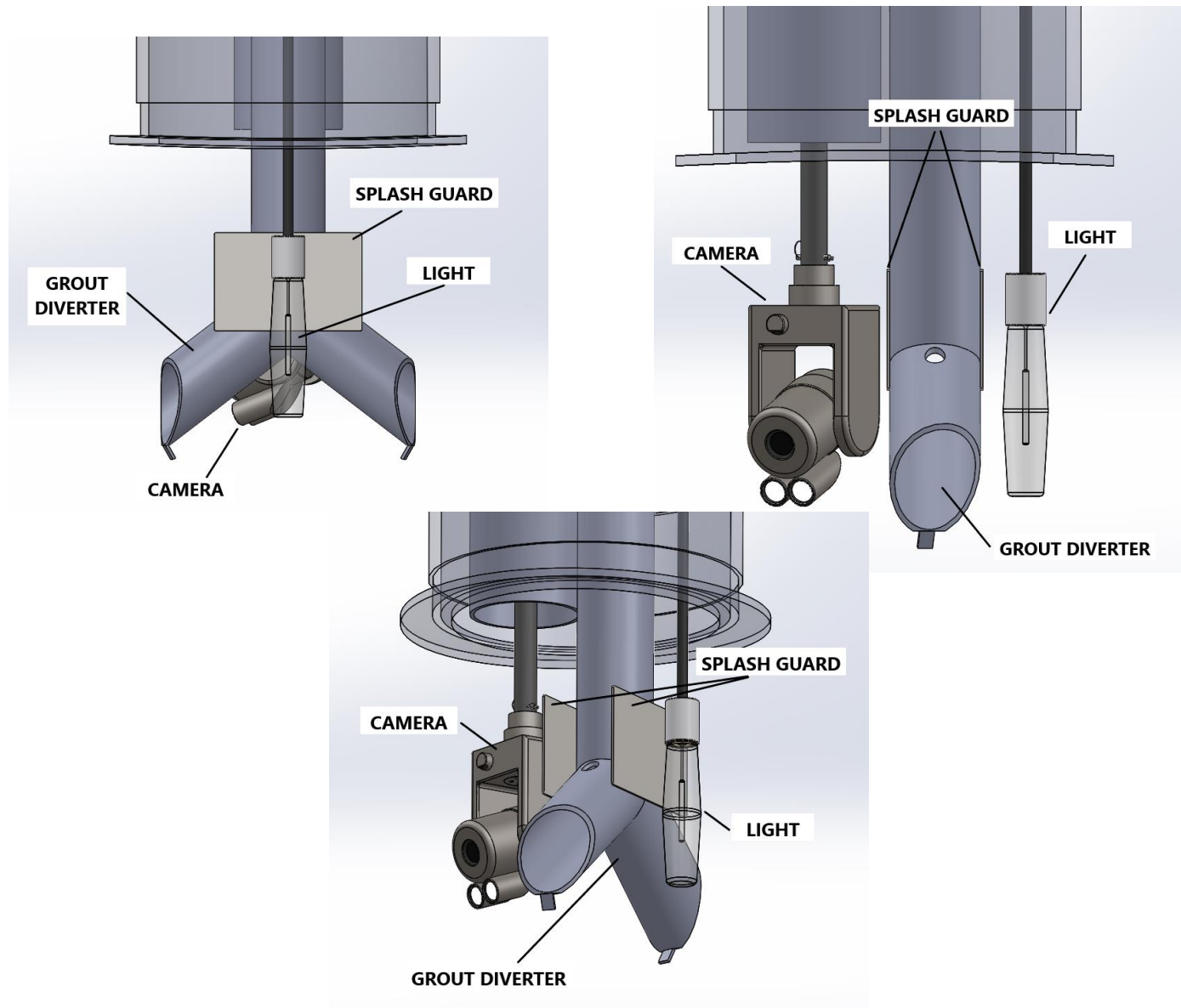


Figure 11-8 Tunnel Number 2 Site Plan

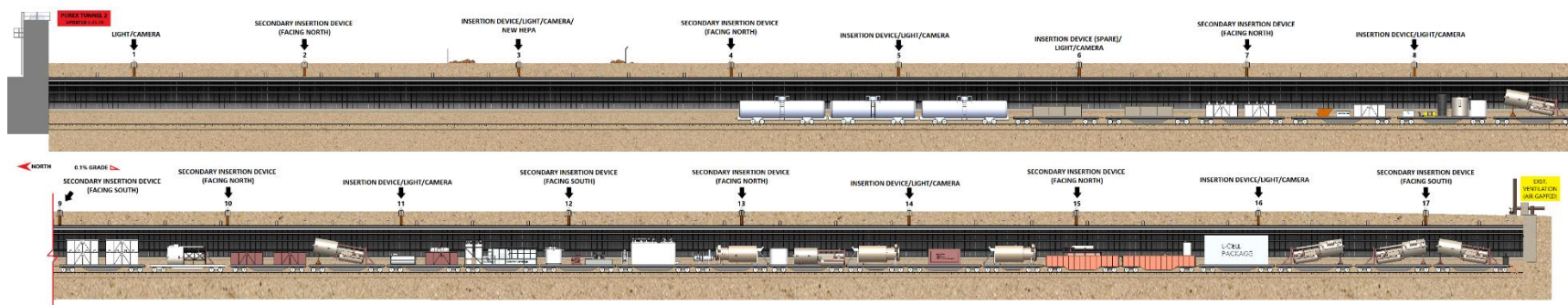


1
2

Figure 11-9 Plug Replacement for Existing Riser in Tunnel Number 2 (Isometric and Plan Views)



1 **Figure 11-10 Equipment to be Deployed Through Existing Riser in Tunnel Number 2 (Two Elevations and Isometric)**



1
2
3

Figure 11-11 Location of Risers and Equipment for Grouting Tunnel Number 2

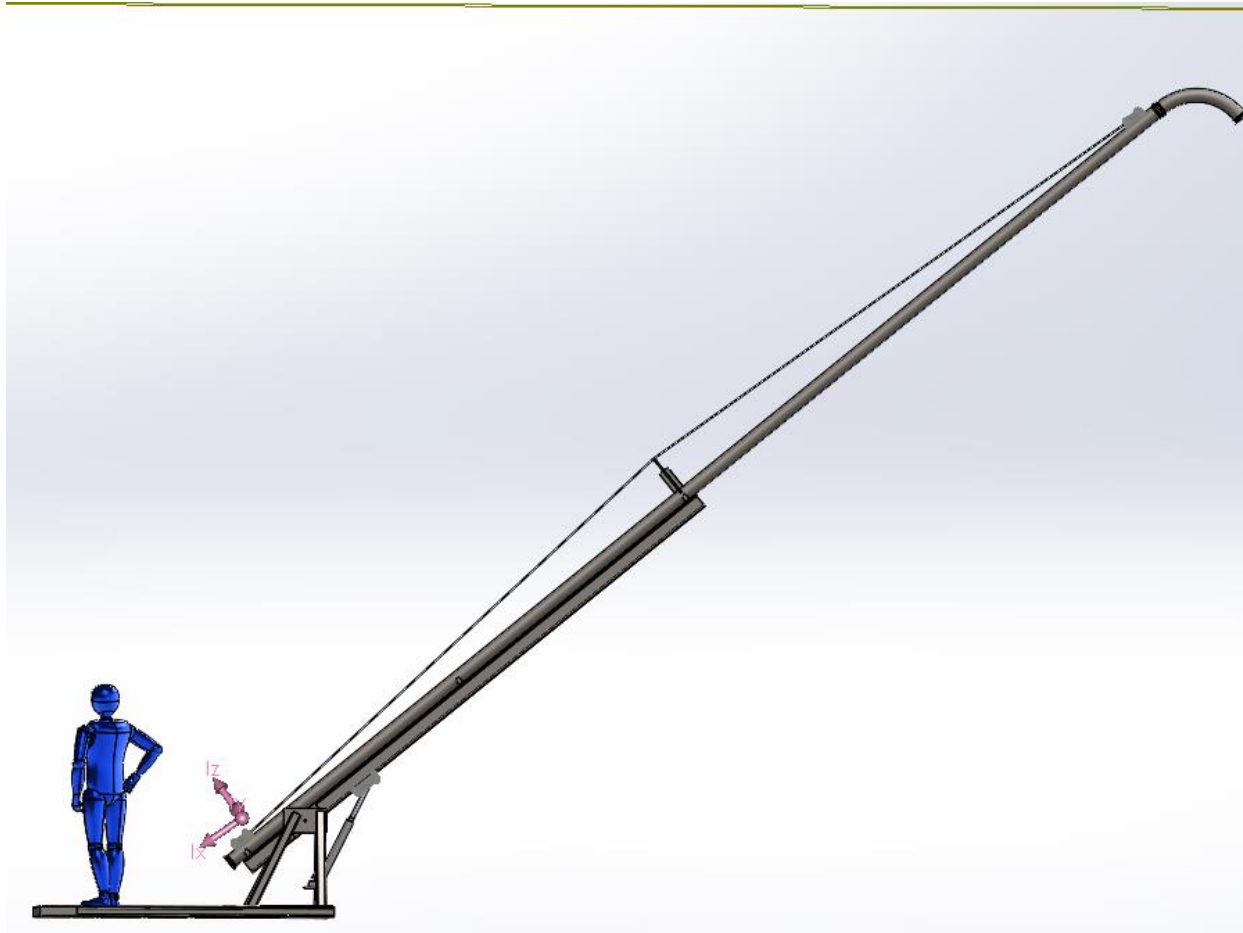


Figure 11-12 Goose-Neck Grout Delivery Piping for Tunnel Number 2

1
2

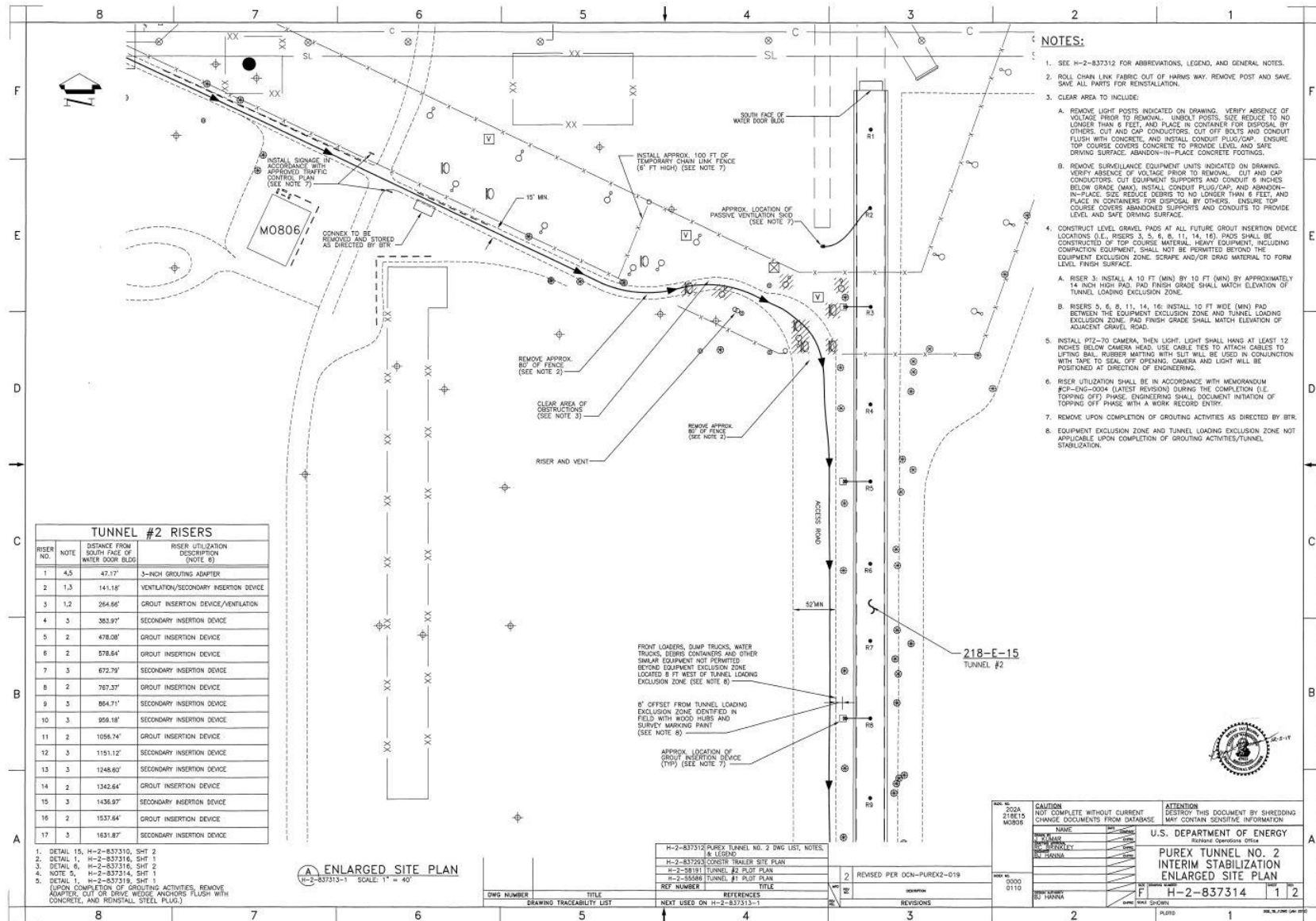
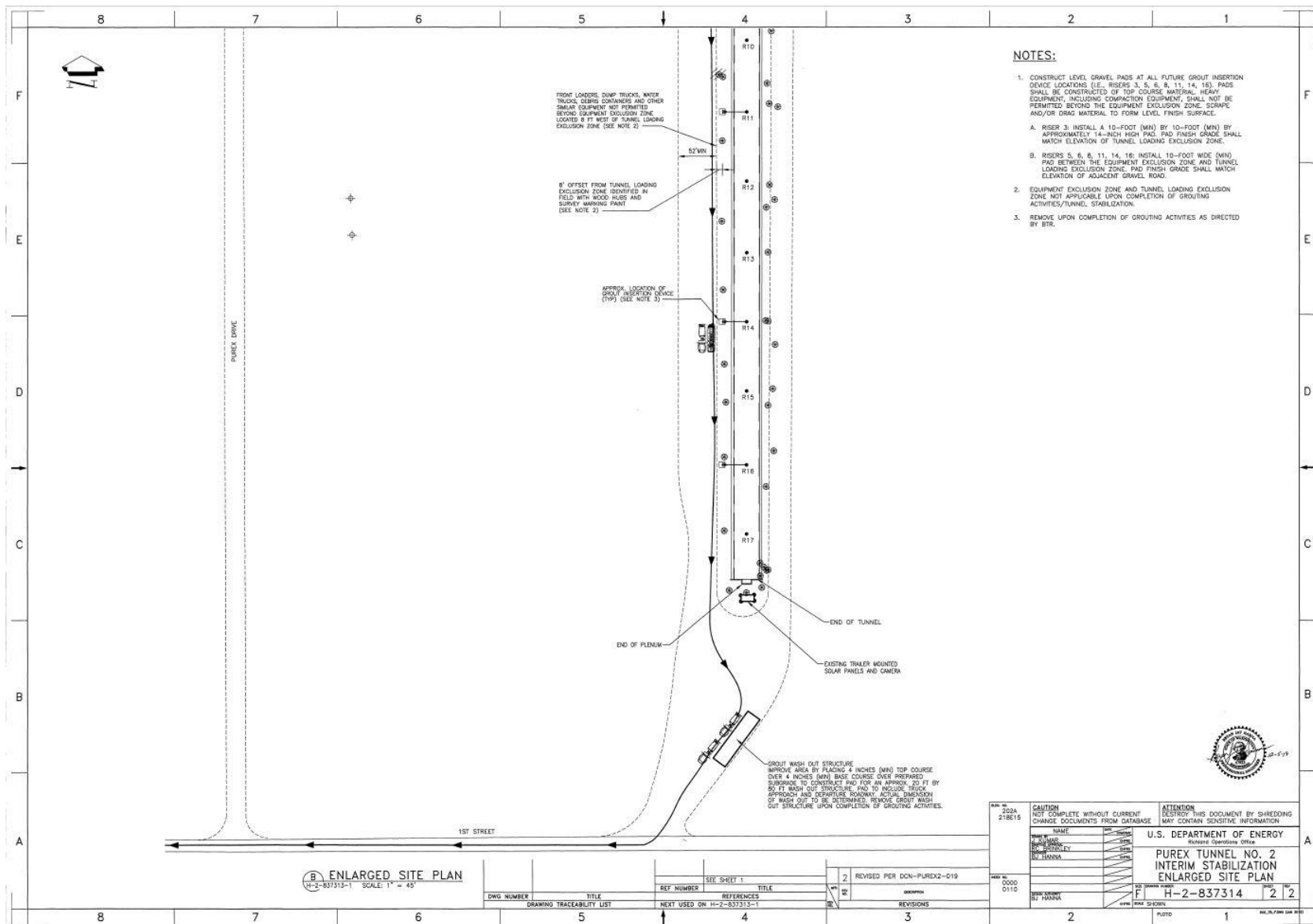


Figure 11-14 PUREX Tunnel No. 2 Interim Stabilization Enlarged Site Plan 1, #H-2-837314-1



1
 2

Figure 11-15 PUREX Tunnel No. 2 Interim Stabilization Enlarged Site Plan 2, #H-2-837314-2

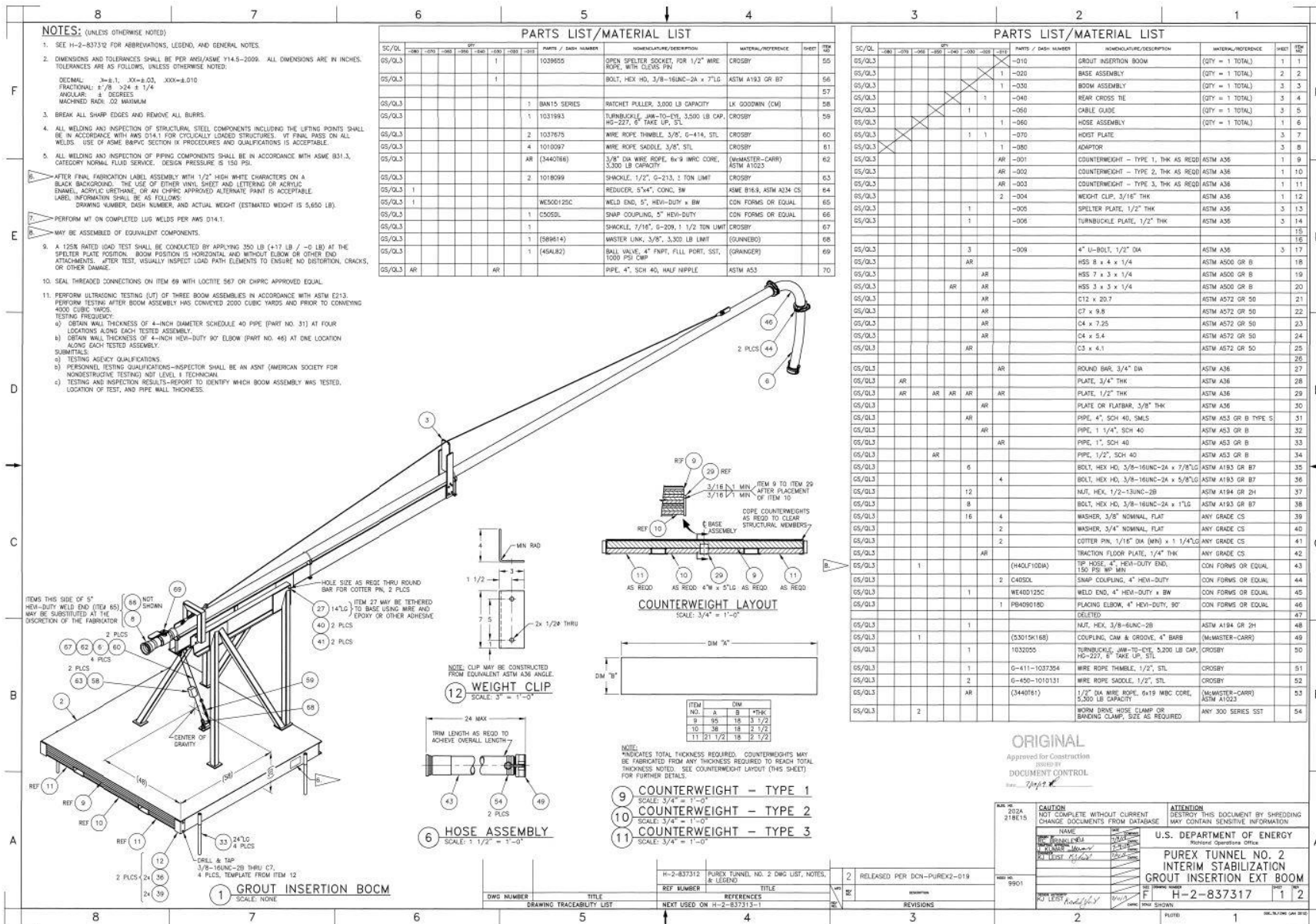


Figure 11-17 PUREX Tunnel No. 2 Interim Stabilization Grout Insertion EXT Boom, #H-2-837317

1
2
3
4

This page intentionally left blank.