



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

JUN 10 2010

OFFICE OF
AIR AND RADIATION

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Dear Mr. Gadbury:

The U.S. Department of Energy's Carlsbad Field Office (CBFO) submitted to the U.S. Environmental Protection Agency (EPA) a Tier 1 (T1) change request on March 2, 2010. The T1 change request was for the Advanced Mixed Waste Treatment Project (AMWTP) at the Idaho National Laboratory to accept Hanford-characterized debris waste from the Plutonium Finishing Plant (PFP) area. This waste consists of approximately 1,034 55-gallon drums overpacked in 85-gallon containers. Based on EPA's evaluation of the T1 change documentation (discussed in the enclosed report with EPA Air Docket No. A-98-49, II-A4-127), EPA approves the proposed T1 change, and the Central Characterization Project (CCP) at Hanford can ship these Hanford overpacks to AMWTP to characterize the waste in overpacks as BN510 waste.

Background:

Between 2001 and August 2009, the Hanford Site, using EPA-approved contact-handled (CH) transuranic (TRU) waste characterization processes, characterized and certified thousands of 55-gallon drums and several hundred standard waste boxes from MPFPD, M231ZD, and M325D waste streams. The Hanford TRU program shipped several thousand of the drums from these three debris waste streams while the program was active. However, several hundred of these 55-gallon drums were damaged and required to be placed in overpack containers before being shipped to the Waste Isolation Pilot Plant (WIPP). Some of these overpacks remain at Hanford requiring disposal at WIPP.

Prior to termination of the Hanford TRU program in August 2009, Hanford characterized an additional several thousand drums of debris waste in the RLMPFPCD waste stream but could not certify them for WIPP disposal. In May 2009, the CBFO approved the Hanford-prepared acceptable knowledge summary report for this waste stream. A few hundred of the 55-gallon drums from this waste stream also required overpacking before shipment to WIPP for disposal. To date, none of the RLMPFPCD drums have been disposed of at the WIPP.



Future activities at AMWTP resulting from the EPA T1 approval:

The AMWTP plans to process the following CH TRU legacy debris waste from the PFP at Hanford in overpacks as BN510 (super-compacted debris) waste from Hanford for further processing.

- 131 drums of mixed PFP debris (MPFPD);
- 66 drums of mixed 231Z building debris (M231ZD);
- 220 drums of mixed 325 building debris (M325D); and
- 617 drums of mixed PFP debris from 234-5Z building only (RLMPFPCD).

The AMWTP will re-package these overpacks into 55-gallon crushable drums and characterize them using the EPA-approved CH TRU waste characterization processes. The newly-characterized drums will be crushed into "pucks" and loaded in 100-gallon containers for disposal at the Waste Isolation Pilot Plant. The AMWTP must provide to EPA the items listed below to verify that the Hanford debris waste has been adequately characterized:

- Revised Acceptable Knowledge (AK) documentation for BN510 showing how Hanford AK and other documentation have been incorporated;
- The revised waste stream profile form for AMWTP's BN510 waste stream to include Hanford waste;
- Batch data reports from visual examination for physical contents and nondestructive assay for radiological contents of BN510 debris; and
- Tracking of Hanford debris waste in AMWTP's waste tracking system.

The EPA will review the above documentation while CBFO certifies the new BN510 waste stream for WIPP disposal.

If you have any questions regarding this approval, please contact Rajani Joglekar (202-343-9462) or Ed Felton (202) 343-9422.

Sincerely,



Tom Peake, Director
Center for Waste Management and Regulations

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EPA DOCKET NO. A-98-49, II-A4-127

Tier 1 Evaluation
Eligibility of Hanford's Contact-Handled Legacy Debris Waste Streams:
MPFPD, RLM231ZD, RLM325D, and RLMPFPCD
for Inclusion in AMWTP's BN510 (Super-Compacted) Debris Waste Stream

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June 2010

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1.0 EXECUTIVE SUMMARY

This report supports U.S. Environmental Protection Agency's (EPA) approval of a Tier 1 (T1) change request submitted on March 2, 2010, by the U.S. Department of Energy's (DOE) Carlsbad Field Office (CBFO). The request is to include the following four Hanford's transuranic (TRU) contact-handled (CH) legacy debris waste streams in the BN510 (super-compacted debris) waste stream at the Advanced Mixed Waste Project (AMWTP):

- MPFPD, Mixed Plutonium Finishing Plant (PFP) debris (AK Report HNF-6489);
- RLM231ZD, Mixed 231Z Building debris (AK Report HNF-32218);
- RLM325D, Mixed 325 Building debris (AK Report HNF-30810); and
- RLMPFPCD, Mixed PFP comprehensive debris (AK Report HNF-36515)

The T1 change request was followed by submission of the acceptable knowledge (AK) documentation for the proposed waste streams.

The T1 change approval will result in the following two outcomes. First, the Hanford-generated legacy debris waste in approximately 1,034 85-gallon overpacks can be shipped to the AMWTP for processing. Second, AMWTP will repackage the waste into new 55-gallon crushable drums and repackage the waste from damaged 55-gallon drum overpacks into the 85-gallon containers. In addition, AMWTP, using the EPA-approved waste characterization processes for contact-handled transuranic (TRU) waste, will recharacterize these new drums as newly-generated waste BN510 waste. Once characterized, AMWTP will crush the drums into "pucks" and load the "pucks" in 100-gallon drums for shipment to and disposal at the Waste Isolation Pilot Plant (WIPP). Since October 2006, AMWTP has been shipping the BN510, super-compacted debris waste stream to WIPP for disposal.

2.0 BACKGROUND

Until August 2009, Hanford characterized CH TRU waste using the CH TRU waste characterization processes with the original 2002 EPA approval and the subsequent baseline approval dated June 2008. (See the EPA Inspection Reports with an EPA Docket Nos. A-98-49, II-A4-25 and A-98-49, II-A4-106 respectively.) Upon termination of the Hanford program, the Central Characterization Project (CCP) took over Hanford's TRU waste characterization program.

In April, 2010, EPA performed a baseline inspection of CCP's implementation of their CH TRU waste characterization program at Hanford and the EPA decision will be announced later 2010. Since the end of 2009, Hanford-CCP has been disposing of the remaining Hanford-certified CH debris containers at WIPP. Hanford-CCP will ship to AMWTP the above-mentioned 1,034 85-gallon overpacks for processing the waste contents as the BN510 waste.

EPA's baseline approval of the AMWTP's CH TRU waste characterization program (Docket No: A-98-49, II-A4-66, September 2006) states that addition of any waste streams to the

approved waste stream BN510 outside of those already included¹ is a Tier 1 change requiring EPA approval prior to including them in the BN510 waste stream. Therefore, EPA's approval is necessary as a T1 change to allow inclusion of waste from the approximately 1,034 Hanford debris overpacks in the BN-510 waste stream.

BN510 is a newly-generated S5000 waste stream composed of waste from multiple sites (including Mound, RF, BCL and BAPL) and managed in the AMWTP facility. In this facility, retrievably-stored or pre-existing CH TRU debris in standard waste boxes or compromised 55-gallon drums are combined within the site box line facility, repackaged, while simultaneously being visually examined for estimating physical content weights, and then placed in new 55-gallon drums as newly-generated debris.

These new drums are characterized for radiological contents within the facility. The drums are then reduced in size by crushing in the facility supercompactor. The crushed drums that result from this process are referred to as "pucks". Depending on the weight and TRU content of individual drums, up to nine pucks of supercompacted 55-gallon drums of debris waste can be loaded into a single 100-gallon overpack container for disposal at the WIPP.

The following four waste streams are the subject of the T1 change request.

- MPFPD, Mixed Plutonium Finishing Plant (PFP) debris (AK Report HNF-6489);
- RLM231ZD, Mixed 231Z Building debris (AK Report HNF-32218);
- RLM325D, Mixed 325 Building debris (AK Report HNF-30810); and
- RLMPFPCD, Mixed PFP comprehensive debris (AK Report HNF-36515)

2.1 MPFPD, Mixed Plutonium Finishing Plant Debris Waste (AK Report HNF-6489):

The MPFPD waste stream is TRU mixed heterogeneous debris created by various production, maintenance, cleanout, stabilization, decontamination, and decommissioning (D&D) activities at PFP. This waste stream consists of mixed TRU debris waste generated between 1970 and the present in support of plutonium metal production operations and glove box activities associated with PFP. The glove boxes were used for defense and non-defense work, which was processed during the same time periods, and the waste stream is considered commingled. The waste consists of in-process and D&D waste, including inorganic and organic debris (S5400) and wastes from several buildings or facilities, i.e., PFP Building 234-5Z (including Remote Mechanical Line A, Remote Mechanical Line C, Laboratories), Building 236-Z-Plutonium Reclamation Facility (PRF), Building 232-Z (Incinerator), and Building 2736-ZB Repackaging and Assaying. The radionuclides associated with this waste are primarily ²⁴¹Am, ²³⁸Pu, ²³⁹Pu, ²⁴⁰Pu, ²⁴²Pu, and ²⁴¹Pu generated from weapons and fuel-grade plutonium processing. The two most prevalent radionuclides by mass are expected to be ²³⁹Pu and ²⁴⁰Pu.

The waste in 55-gallon drums was generated from July 7, 1972 through December 29, 1989. The EPA originally approved the S5000 Summary Category Group (SCG) that includes this

¹ [Mound, Rocky Flats (RF), Battelle Columbus Laboratory (BCL), and Bettis Atomic Power Laboratory (BAPL)]

waste stream in 2002 and again in 2008. A waste stream profile form (WSPF) for the MPFPD waste stream was approved by CBFO in July 2002.

2.2 RLM231ZD, 231 Z Building Waste (AK Report HNF-32128):

This waste stream was generated by metallurgical research and plutonium fabrication, D&D, technology development, and facility cleanout activities within Building 231-Z between 1970 and the present. It is composed of various metal, combustible, non-combustible, glass, and other debris. The radionuclides potentially present include weapons-grade plutonium (WG Pu) and fuel-grade plutonium (^{238}Pu , ^{239}Pu , ^{240}Pu , ^{241}Pu , and ^{242}Pu), uranium (^{232}U , ^{233}U , ^{234}U , ^{235}U , ^{236}U , and ^{238}U), trace amounts of americium (^{241}Am and ^{243}Am), and ^{237}Np . Mixed fission/activation products such as ^{137}Cs , ^{90}Sr , ^{154}Eu and ^{60}Co , would be expected in trace amounts because the plutonium was purified prior to receipt at the facility. Plutonium and americium oxide residues remaining from metallurgical studies with plutonium and D&D of contaminated equipment are also assumed to be in the waste. The two predominant radionuclides by mass are ^{238}U and ^{239}Pu , and ^{241}Pu and ^{239}Pu are the two predominant radionuclides by activity.

The EPA initially approved the S5000 SCG that includes this waste stream in 2002 and again in 2008. A WSPF for the Hanford 231 Z Building waste stream was approved by CBFO in July 2007.

2.3 RLM325D, Hanford 325 Building Radiochemical Processing Laboratory Waste (AK Report HNF-30810)

This waste stream is CH debris (S5400) generated at the 325 Building Radiochemical Processing Laboratory. It was generated from September 28, 1972 through February 12, 1990 and is composed of laboratory-generated waste from glove boxes, fume hoods, and hot cells, and may contain inorganic debris, organic debris, various metals, protective clothing, filters, and other materials. All of the WIPP-tracked radionuclides (^{241}Am , ^{238}Pu , ^{239}Pu , ^{240}Pu , ^{242}Pu , ^{233}U , ^{234}U , ^{238}U , ^{137}Cs , and ^{90}Sr) are expected to be present in this waste stream. Isotopic distributions for Pu, U and Am are assumed to be contaminated by PUREX²-derived waste, so isotopic distributions associated with PUREX tank waste were representative of this waste stream. The two predominant radionuclides by mass are ^{238}U and ^{239}Pu , and ^{241}Pu and ^{241}Am are the two predominant radionuclides by activity.

The EPA originally approved the S5000 SCG that includes this waste stream in 2002 and again in 2008. A WSPF for the 325 Building Radiochemical Processing Laboratory Waste was approved by CBFO in May 2007.

2.4 RLMPFPCD, Mixed PFP Comprehensive Debris (AK Report HNF-36515)

This is a mixed, heterogeneous S5400 debris waste stream generated from 1970 through the end of Hanford site's waste characterization program in support of PFP's plutonium production and stabilization activities. It is composed of a variety of inorganic, organic metal, and other debris

² PUREX is the name given to a plutonium-uranium extraction process whereby plutonium and uranium for weapons production was chemically separated from the irradiated fuel from the Hanford production reactors.

materials, and includes both process and D&D waste. All of the facilities included in the MPFPD waste stream are also in RLMPFPCD, which also includes the Building 242-Z- Waste Treatment Facility, 291-Z- Ventilation/Exhaust Air Stack Building, and PFP Ancillary Facilities. Plutonium (^{241}Pu , ^{238}Pu , ^{239}Pu , ^{240}Pu , ^{242}Pu) is the main radionuclide in this waste, but there are also trace amounts of uranium (^{232}U , ^{233}U , ^{234}U , ^{235}U , ^{236}U , ^{238}U), ^{241}Am , ^{237}Np , ^{137}Cs , and ^{90}Sr . This waste stream may contain WG Pu (^{240}Pu weight percentage 0.9% to 7%) and fuel grade Pu (^{240}Pu weight percentage 8% to 27%). Based on historical processing loads, a major portion of the plutonium processed in PFP was approximately 12% ^{240}Pu . The two most prevalent TRU radionuclides by weight in this waste stream are ^{239}Pu and ^{240}Pu .

EPA did not receive any AK documentation for this waste stream while the Hanford's TRU program was still active. An AK Summary Report HNF-36515 was approved by CBFO in May 2009. No WSPF was approved for this waste stream.

3.0 EPA ASSESSMENT

3.1 EPA Evaluation of MPFPD, M231ZD, and M325D Waste Streams

EPA evaluated the four waste streams based upon AK information provided by CBFO. In addition, EPA referred to documentation obtained and reviewed during past Hanford site inspections performed between 2001 and 2007 for additional information. In particular, EPA examined EPA's original approval and baseline approval reports and some of the related references. EPA examined the MPFPD waste stream as part of the original 2002 Inspection, and the RLM325D and RLM231ZD waste streams were approved as part of EPA's S5000 Summary Category Group approval under both Hanford's original approval and EPA's later baseline approval. The drums belonging to these waste streams have been certified and disposed of at the WIPP. At the termination of the Hanford TRU program, a portion of certified drums from these three waste streams still remain at Hanford. The 55-gallon drums are being shipped to WIPP by Hanford-CCP. Some 85-gallon overpacks, however, remain at Hanford which will be sent to the AMWTP for managing the contents as the B510 waste.

3.2 EPA Analysis of the RLMPFPCD Waste Stream

During EPA's 2001-2008 data review, mentioned previously in Section 2.0 of this report, EPA did not identify any information pertaining to waste stream RLMPFPCD. EPA recently learned that Hanford had prepared AK Summary Report HNF-36515 which CBFO approved in May 2009. CBFO had provided an AK report for this waste stream as part of a Tier 2 change submission at the end of the 3rd quarter of fiscal year 2009, after Hanford's original characterization program had been terminated. No WSPF is available for this waste stream. The RLMPFPCD waste is presently contained in approximately 4,130 55-gal drums (859 m^3) and 317 various-sized boxes ($4,720\text{ m}^3$) for a total volume of $5,579\text{ m}^3$.

Hanford-CCP is currently responsible for characterizing CH TRU debris waste at Hanford and EPA inspected the program in late April 2010. As part of the proposed baseline approval, EPA is reviewing debris waste stream MPFPDD. This waste stream includes debris from the MPFPD and RLMPFPCD waste stream, so the origin and content of the CCP waste stream required

clarification and discussion with CBFO and CCP. EPA sent a series of emails to convey EPA's understanding and had a conference call to obtain further clarification. In addition, EPA and Hanford-CCP staff met to decipher the waste generation and AK specific to the RLMPFPCD waste stream. This discussion was useful and EPA learned the following details about RLMPFPCD waste stream:

- This waste stream:
 - Is a composite consisting of legacy debris from several locations within the PFP complex;
 - Has thousands of certified 55-gallon containers of legacy debris including the MPFPD waste stream from various PFP location; and
 - Has 617 certified 55-gallon containers overpacked into 85-gallon containers that do not include containers from the Building 242-Z- Waste Treatment Facility, 291-Z- Ventilation/Exhaust Air Stack Building, and PFP Ancillary Facilities. In other words, Hanford-CCP indicates that the 617 containers include only those that also fall under the MPFPD waste stream.
- The 617 85-gallon overpacks have debris waste from Building 234-5Z
- These 617 are the candidate containers for shipment to AMWTP.
- The debris from other PFP locations constituting the RLMPFPCD waste stream do not have waste drums in 85-gallon overpacks.

In addition, more importantly,

- Hanford-CCP's new MCPFPDD waste stream does not include any overpacked legacy debris waste from either the MPFPD or RLMPFPCD waste streams.
- Hanford-CCP is processing mostly newly-generated debris at this time.
- Hanford-CCP will continue to ship to WIPP the rest of the population of the Hanford-certified waste to WIPP for disposal that are not overpacked.
- Hanford-CCP will characterize for WIPP disposal debris drums from RLMPFPCD and MPFPD waste streams that are included into the new waste stream MPFPDD along with debris from other buildings within the PFP complex.

The above information was crucial in clarifying EPA's understanding of the RLMPFPCD waste stream as proposed in the Tier 1 request.

3.3 Comparison of Hanford AK Documentation with AMWTP's AK Documentation for BN510 Waste

EPA reviewed the following documents for this T1 evaluation:

- WIPP WSPF for RLM231ZD.001, dated July 30, 2007, and related attachments
- WIPP WSPF for RLM325D.001, dated May 16, 2007, and related attachments

- WIPP WSPF for RLMPDT.001 dated July 31, 2002, and related attachments, including Change Notices 1 (December 4, 2003) Change Notice 2 (August 22, 2005), and Change Notice 3 (March 6, 2007)
- AK Summary HNF-6489, Revision 1, MPFPD, unsigned and undated
- AK Summary HNF-36515, RLMPFPCD Revision 0, unsigned and undated
- AK Summary HNF- 32128 Revision 2, Acceptable Knowledge Document for Richland 231-Z Mixed Debris Waste Stream RLM231ZD, published May 2009
- AK Summary HNF-30810, Revision 1, Acceptable Knowledge Document for the 325 Building Radiochemistry Laboratory Mixed Debris Waste Stream, RLM325D, published July 2007
- RPT-TRUW-30, Revision 5, Acceptable Knowledge Summary for Supercompacted Debris Waste (BN510) Advanced Mixed Waste Treatment Project, Approved: (Signature on file. See DCR-6963.) May 6, 2008

While Hanford-CCP process knowledge transportation documents (i.e., “PK” reports) were provided as references, EPA’s review focused on Hanford site documentation, namely Hanford’s AK Reports, to determine whether the proposed four debris waste streams (summarized in the section above) generally fit into AMWTP’s BN510 waste “envelope”.

AMWTP’s BN510 waste is a compilation of debris from various sites (e.g., Mound, and BCL). As stated in the AMWTP baseline approval, EPA must approve inclusion of any debris waste from a new source (e.g., Hanford) in BN510 that is outside of EPA’s original AMWTP baseline approval. This section addresses only the determination that the information provided for the four waste streams generally fits the approved envelope of BN510, and does not include the adequacy of AMWTP’s characterization process associated with these drums, including visual examination (VE), real time radiography (RTR), and integration of the data into the BN510 AK Summary.

EPA compared each waste stream against the original BN510 AK Summary Report RPT-TRUW-30, Revision 5, May 2008, to determine whether the four waste streams could be included in the BN510 “envelope” based on the following technical elements:

- Waste stream definition
- Radiological composition
- Physical composition including presence of prohibited items
- Defense origin
- Absence of spent nuclear fuel and high level waste
- TRU waste
- Load Management.

Based on the review, as indicated in Table 1, below, EPA determines that these four waste streams fit within the general definition of BN510 and are consistent with other offsite (e.g., Mound, BAPL and BCL) debris waste included in the BN510 approval as part of the AMWTP baseline approval given in September 2006.

Table 1. Waste Stream Evaluation Summary Table

Waste Stream	Waste Stream Definition	Radiological Characteristics	Physical Characteristics and Prohibited Items	Defense Origin	SNF/HLW	TRU Waste	Load Management*
RLM231ZD.001	Yes	Yes	Yes	Yes	Yes	Yes	Yes
RLM325D.001	Yes	Yes	Yes	Yes	Yes	Yes	Yes
MPFPD	Yes	Yes	Yes	Yes	Yes	Yes	Yes
RLMPFPCD	Yes	Yes	Yes	Yes	Yes	Yes	Yes

* - AMWTP must inform EPA if these waste streams would be considered for load management requiring EPA review and approval.

3.4 Need for EPA to Verify AMWTP's Processing of Four Hanford Waste Streams

AMWTP must use EPA-approved CH TRU waste characterization program components, including VE, nondestructive assay, and AK, when incorporating the 1,034 overpacked debris containers from Hanford into the newly-generated BN510 waste stream. AMWTP must inform EPA when the characterization activities begin for the Hanford-originated debris waste and when EPA should expect to get the appropriate documents for verification. EPA will review physical and radiological contents information for BN510 drums characterized by AMWTP to verify completeness and technical adequacy with respect to the new BN510 waste stream upon AMWTP's incorporation of the debris from the four debris waste streams mentioned above. As part of these analyses, the AMWTP must provide to EPA for review the AK and WSPF for the new BN510.1 waste stream for technical adequacy. In addition, the AMWTP must provide a list of batch data reports (BDRs), once a sufficient number of these newly-generated waste drums are characterized to prepare such documents. EPA will select a few BDRs from the AMWTP-provided list for technical adequacy. The EPA verification will occur in an expedient manner recognizing the legal commitments the Idaho National Laboratory has made with the State of Idaho concerning the disposition of offsite-originated TRU waste.

4.0 CONCLUSION

The data and clarification provided by CBFO and CCP pertaining to the four waste streams satisfies EPA's Tier 1 change requirement. Based on an examination of the data and information conveyed through meetings and conference calls, EPA concludes that a total of 1,034 85-gallon overpacks containing waste from the four Hanford legacy debris waste streams may be shipped to AMWTP. The breakdown of the overpacks into four waste streams is as follows:

- 131 containers from MPFPD;
- 66 containers from M231ZD;
- 220 containers from M325D; and
- 617 containers from RLMPFPCD (from 234-5Z building)

It is AMWTP's responsibility to evaluate and accept the specified overpacks containing Hanford's legacy debris waste for further processing prior to disposal at the WIPP.