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Job No. 23900

February 15, 1999

Oak Ridge National Laboratory
Lockheed Martin Energy Research Corporation
Post Office Box 2008
Oak Ridge, Tennessee 37831-6241

Attention: Dr. Richard K. Genung
Deputy Director and Executive Vice President

Subject: Interfaces for Waste Disposition

Dear Dr. Genung:

There have been ongoing discussions between our respective companies about the various interfaces for the disposition of waste to be generated by Lockheed Martin Energy Research Corporation (LMER). The roles and responsibilities that now exist have been addressed in the *Supplement to the Agreement for Transfer of Responsibilities and Interfaces (Supplement to the Transfer Agreement)* that is now ready for signature by our companies. The purpose of this letter is to provide affected operational details needed by the management of the LMER Laboratory Services organization.

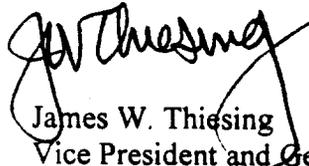
It is our understanding that the LMER Laboratory Services organization will be our primary interface for the disposition of waste through the Bechtel Jacobs Company LLC contract. The attachment to this letter addresses the individual waste streams, as well as the generator services that will be available to LMER from Bechtel Jacobs Company. It includes some quantitative information about the projected number of pickup points and the frequency of picking up waste from LMER. We have been told that LMER needs this information for planning purposes. This information represents our best estimate of future operations, and this will be updated as more information becomes available. With this in mind, we are suggesting that our respective managers meet on at least a monthly basis to address changes in the forecast, as well as the evolving interface.

Should there be any conflicts in the information in Attachment I to this letter with the *Supplement to the Transfer Agreement*, the *Supplement to the Transfer Agreement* takes precedence.

Dr. Richard K. Genung
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If you have questions or need additional information, please call Mike West at 576-1733 or Tom Monk at 574-0660.

Sincerely,



James W. Thiesing
Vice President and General Manager

JWT:THM:vke
LW-99-0054

Attachment

cc: D. G. Cope (LMER)
C. E. Frye
M. J. Lauterbach
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S. G. Stiger
M. L. West
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File: EMEF-DMC - RC
File: JWT

ATTACHMENT

Working Interface for Waste Disposition from LMER

February 12, 1999

The information below outlines the communication in various meetings over the last two months between Lockheed Martin Energy Research Corporation (LMER) and the Bechtel Jacobs Company LLC regarding their respective interfaces for waste disposition from LMER. Should this information in any way conflict with the *Supplement to the Agreement for Transfer of Responsibilities and Interfaces (Supplement to the Transfer Agreement)*, the information in the *Supplement to the Transfer Agreement* takes precedence.

Hazardous Waste Management - LMER will provide waste characterization data; manage its 90-day accumulation areas, satellite accumulation areas, and TSCA areas; and provide documentation to demonstrate adherence with Bechtel Jacobs Company's waste acceptance program requirements. Bechtel Jacobs Company will provide the waste acceptance requirements to LMER and will remove waste items from designated LMER locations. Bechtel Jacobs Company expects to pickup waste items on a weekly basis from up to 15 designated accumulation areas consisting of a mixture of nine fixed and six variable locations. It is Bechtel Jacobs Company's intent to take everything from a pickup point that is certified and ready to go. Bechtel Jacobs Company will prioritize the pickups, working in cooperation with LMER Laboratory Services to ensure compliance. Pickups will also be a function of the number of items that must be picked up. LMER will provide complete waste certification for all items within 30 days of placement into a 90-day area. Bechtel Jacobs Company will provide on-site storage for hazardous waste that is not shipped prior to the expiration of the regulatory time limit as required.

Bechtel Jacobs Company or our subcontractor will provide specialized, prompt service to collect identified shock-sensitive or explosive wastes that pose an immediate threat to health and safety from generator locations, transport, storage, and disposal of those wastes as required.

Mixed Waste Management - LMER will provide waste characterization; manage its 90-day accumulation areas, satellite accumulation areas, and TSCA areas; and provide documentation to demonstrate adherence with Bechtel Jacobs Company's waste acceptance program requirements. Bechtel Jacobs Company will provide waste acceptance requirements to LMER and will remove waste items from designated LMER locations. Bechtel Jacobs Company intends to pickup waste items on a weekly basis from up to 15 designated accumulation areas consisting of a mixture of fixed and variable locations. It is Bechtel Jacobs Company's intent to take everything from a pickup point that is certified and ready to go. Bechtel Jacobs Company will prioritize the pickups, working in cooperation with LMER Laboratory Services to ensure compliance. Pickups will also be a function of the number of items that must be picked up. LMER will provide complete waste certification for all items within 30 days of placement into a 90-day area. Bechtel Jacobs Company will provide permitted storage for mixed wastes not shipped prior to expiration of regulatory time limits or awaiting treatment consistent with the provisions of the Site Treatment Plan.

Low-level Waste Management - LMER is responsible for waste characterization and supplying documentation to demonstrate adherence with Bechtel Jacobs Company's waste acceptance program requirements. Bechtel Jacobs Company will be responsible for providing the waste acceptance requirements and for removing low-level waste containers meeting the waste acceptance requirements from up to 20 LMER generator facilities per week. In cases where unusual or adverse health and/or safety conditions are created, such as might be posed by generator-staged Remote-Handled (RH) Low-Level Waste, Bechtel Jacobs Company will work with LMER to expeditiously remove wastes that meet the waste acceptance requirements from the generator's facility.

Transuranic Waste Management - LMER will provide waste characterization data for their generated waste and supply documentation to demonstrate adherence with Bechtel Jacobs Company's waste acceptance program requirements. Bechtel Jacobs Company will provide the waste acceptance requirements and remove

transuranic waste containers that meet the waste acceptance requirements from LMER generator facilities. In cases where unusual or adverse health and/or safety conditions are created, such as might be posed by generator-staged Remote-Handled (RH) transuranic waste, Bechtel Jacobs Company will work with LMER to expeditiously remove wastes that meet the waste acceptance requirements from the generator's facility.

Special Case Wastes and Spent Nuclear Fuel - LMER will provide characterization data for their generated special case wastes and spent nuclear fuel. In addition, LMER will supply documentation to demonstrate adherence with Bechtel Jacobs Company's acceptance program requirements. Bechtel Jacobs Company will provide the acceptance requirements, and remove special case waste containers and/or spent nuclear fuel containers meeting the acceptance requirements from LMER generator facilities as requested by LMER. In cases where unusual or adverse health and/or safety conditions are created, such as might be posed by certain generator-staged Special Case Waste or Spent Nuclear Fuel, Bechtel Jacobs Company will make special arrangements to expeditiously remove such packages meeting acceptance requirements from generator facilities.

Liquid/Gaseous Waste Treatment - LMER is responsible for meeting the acceptance requirements for the liquid and gaseous waste treatment systems and providing required documentation to demonstrate compliance with those requirements. Bechtel Jacobs Company will provide acceptance requirements and will work with LMER to evaluate special cases to determine if they are acceptable for treatment of wastes that do not strictly meet published system requirements. It is expected that no significant changes to treatment system waste acceptance criteria or analytical requirements will be necessary and that system acceptance requirements will continue to allow the discharge of liquid wastes within the established criteria. Bechtel Jacobs Company is responsible for operating the central Liquid low-level Waste Treatment System, the Process Waste Treatment Complex, and the Gaseous Waste Treatment System. System boundaries have been established with LMER.

Acceptance Program Requirements - LMER will meet the waste acceptance requirements, as identified by Bechtel Jacobs Company, in effect at the time the waste is transferred. LMER will bear no further responsibilities for meeting revised waste acceptance requirements should they change after the time of transfer from LMER to Bechtel Jacobs Company. LMER understands that they will continue to have responsibility for waste, which is determined to not meet the waste acceptance requirements that were in effect at the time of transfer, while the waste is in storage or at the time of final disposition. Correspondingly, it is the responsibility of Bechtel Jacobs Company to clearly and unambiguously communicate to LMER the specific requirements for transferring waste from LMER to Bechtel Jacobs Company. Changes to waste acceptance program requirements will be administered in accordance with the Supplement to the Transfer Agreement. It is expected that any requirements mandated by the disposition end-point and critical to their acceptance of LMER-generated wastes will be reflected in the waste acceptance program of Bechtel Jacobs Company.

Bechtel Jacobs Company may conditionally accept waste consistent with the storage facility authorization basis because of health and safety concerns, generator operating issues, or regulatory time limits that does not meet the waste acceptance requirements. LMER will be responsible for meeting the waste acceptance requirements for conditionally accepted waste within 120 days of conditional acceptance. Conditionally accepted waste that is found not to meet the Bechtel Jacobs Company waste acceptance program requirements will either be returned to LMER for remediation or stored and remedied by Bechtel Jacobs Company at cost to LMER.

Waste Information Management System - Bechtel Jacobs Company or our subcontractor will operate the waste tracking system for waste from LMER. LMER waste generators will document the generation of waste through completion of the electronic form set in the Generator Entry System (GES), printing the form set, and submitting the form set to the Bechtel Jacobs Company, Generator Services organization for review and approval. It is understood that Bechtel Jacobs Company and LMER will work together in a cooperative fashion to ensure that all necessary waste data is reported through GES. Bechtel Jacobs Company and LMER

shall also work together in a cooperative fashion to fully support either company's needs in preparing environmental reports required by state or federal regulations.

NDA/NDE - Bechtel Jacobs or its subcontractor will provide NDA/NDE services at the ORNL site. LMER will have access to NDA/NDE services through the work authorization document process. LMER shall pay Bechtel Jacobs Company's actual cost for services (i.e., subcontract unit rate) plus Bechtel Jacobs Company's current site overhead rate at the time the NDA/NDE procedure was performed.

Programmatic and Operational Coordination - To ensure operational coordination between Bechtel Jacobs Company and LMER, weekly meetings will be held between Bechtel Jacobs Company Solids Waste Operations organization and LMER's Laboratory Services organization. LMER will update and provide an inventory of the contents of 90-day areas to the Bechtel Jacobs Company Solid Waste Operations organization at the weekly meetings. Programmatic coordination will be achieved through monthly meetings between Bechtel Jacobs Company and LMER Laboratory Waste Services senior staff.