



**Department of Energy**  
Richland Operations Office  
P.O. Box 550  
Richland, Washington 99352

17-ESQ-0010

NOV 04 2016

Ms. Alexandra K. Smith  
Nuclear Waste Program  
Washington State Department of Ecology  
3100 Port of Benton Boulevard  
Richland, Washington 99354

Dear Ms. Smith:

RESPONSE TO DANGEROUS WASTE COMPLIANCE INSPECTION ON MAY 26, 2016, AT THE WASTE ENCAPSULATION AND STORAGE FACILITY (WESF), RESOURCE CONSERVATION AND RECOVERY ACT (RCRA) SITE ID: WA7890008967, NUCLEAR WASTE PROGRAM COMPLIANCE INDEX NUMBER NO.: 16.561

This letter is in response to the September 1, 2016, (16-NWP-151) letter regarding the compliance inspection of WESF performed on May 26, 2016. This letter was officially received on September 8, 2016. The U.S. Department of Energy Richland Operations Office and CH2M HILL Plateau Remediation Company have reviewed the identified non-compliance with Dangerous Waste Regulations cited by the Washington State Department of Ecology. Responses are provided in the Enclosure.

If you have any questions, please contact me, or your staff may contact Jeffrey A. Frey, Assistant Manager for Safety and Environment, on (509) 376-7727.

Sincerely,

Doug S. Shoop  
Manager

ESQ:DBC

Enclosures:

1. Responses to Alleged Non-compliance in 16-NWP-151
2. Copies of requested WESF Inspections Data Sheets

cc: See page 2

Ms. Alexandra K. Smith  
17-ESQ-0010

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cc w/encls:

Dave B. Bartus, EPA  
Jack L. Boller, EPA  
Kathleen A. Conaway, Ecology  
Laura J. Cusack, CHPRC  
Jerry W. Cammann, MSA  
Dennis A Faulk, EPA  
Moses N. Jaraysi, CHPRC  
Stephanie K. Johansen, CHPRC  
Jared W. Mathey, Ecology  
John B. Price, Ecology  
Kevin Schanilec, EPA  
Connie J. Simiele, CHPRC  
Ron R. Skinnarland, Ecology  
Joel F. Williams Jr, CHPRC  
Administrative Record, TSD: S-2-10 (Hardcopy)  
Ecology NWP Library (Hardcopy)  
Environmental Portal, G3-35  
HF Operating Record (J. K. Perry, MSA A3-01)

cc w/o encls:

Gabriel Bohnee, Nez Perce  
Russell Jim, YN  
Rod Skeen, CTUIR

**Enclosure 1**  
**Response to Alleged Non-Compliance 1 in 16-NWP-151**

**Non-Compliance 1 (from 16-NWP-151): Issues with Inspection Logs**

Ecology Reference:

“WAC 173-303-400(3), as referenced by the Hanford Facility Resource Conservation and Recovery Act Permit, Dangerous Waste Portion Revision SC - Condition I.A Effect of Permit.

WAC 173-303-320(2)(d) The owner or operator must keep an inspection log or summary, including at least the date and time of the inspection, the printed name and the handwritten signature of the inspector, a notation of the observations made, an account of spills or discharges in accordance with WAC 173-303-145, and the date and nature of any repairs or remedial actions taken. The log or summary must be kept at the facility for at least five years from the date of inspection.

WAC 173-303-200(1) A generator, not to include transporters as referenced in WAC 173-303-240(3), may accumulate dangerous waste on-site without a permit for ninety days or less after the date of generation, provided that: (b) The waste is placed: (i) In containers and the generator complies with WAC 173-303-630 (2), (3), (4), (5), (6), (8), (9), (10), and 40 C.F.R. Part 265 Subparts AA, BB, and CC incorporated by reference at WAC 173-303-400 (3)(a).

WAC 173-303-630(6) Inspections. At least weekly, the owner or operator must inspect areas where containers are stored, looking for leaking containers and for deterioration of containers and the containment system caused by corrosion, deterioration, or other factors. The owner or operator must keep an inspection log including at least the date and time of the inspection, the printed name and the handwritten signature of the inspector, a notation of the observations made and the date and nature of any repairs or remedial actions taken. The log must be kept at the facility for at least five years from the date of inspection.”

Observations:

“I requested the record for the 2015 annual inspection of WESF. I received work document 2C-15-02236, which was titled, *WESF: 365D Inspect/Walkdown Outside of the TSD (ENV <06130>*. I observed on the *Data Sheet#*: 2C-02276, what appears to be the inspector's first name initial and the full last name.

I requested the daily beta monitoring surveillance data sheets from May 1, to May 14, 2016. I reviewed the inspection records titled *Appendix B- WPMCS (IX-Beta-TKJ00)*, *Appendix B - (Cont.) WP MCS (IX-Beta-TKJ 00)*, and *Appendix N - Notes Section*. On numerous inspection records between May 1, and May 14, 2016, I observed what appears to be the inspector's first and/or middle name initial and the full last name. On other records I observed what appears to be only the inspector's last name.

**Enclosure 1**  
**Response to Alleged Non-Compliance 1 in 16-NWP-151**

I requested records for the types of general facility inspections for April and May 2016. I received inspection records for automatic sprinkler systems, fire protection valves, fire extinguishers, communication equipment, safety showers, and eyewash stations. I reviewed the inspection records and did not observe the times of the inspections or a location to write the time of the inspection. I observed what appears to be the inspector's first and/or middle name initial and the full last name. On other records I observed what appears to be only the inspector's last name.

I requested weekly inspection logs for the 226-B less than 90 day accumulation area, which were conducted in May 2016. I reviewed and observed what appears to be the inspector's first and/or middle name initial and the full last name.”

Action Required:

Immediately upon receipt of this compliance report, the U.S. Department of Energy Richland Operations Office (RL) and CH2M HILL Plateau Remediation Company (CHPRC) must include the time of the inspection on inspection logs and summaries. Within 60 days upon receipt of this compliance report RL and CHPRC must provide to Washington State Department of Ecology (Ecology), the latest inspection logs that include the time of the inspection for the fire protection system, fire extinguisher, safety shower, and eyewash station inspections.

RL and CHPRC Response:

In cooperation with Ecology, on July 18, 2016, RL directed its principal contractors, including CHPRC, to instruct facility inspectors to print their full first and last name on future inspection records. In the WESF records of inspections that Ecology reviewed for April 2015 and May 2016, each inspector printed his or her name with first initial or just last name, which fully identified the individual(s) who performed each inspection. These actions complied with the regulatory requirement for a “printed name” before RL provided new directions to CHPRC. Also, direction has been given to put the time of the inspection on all inspection records.

Copies of the inspection logs (inspection data sheets) requested in Ecology’s “Action Required” are provided in Enclosure 2.

**WESF: MONTHLY FIRE EXTINGUISHER INSPECTION (FIRE)**  
**(Data Sheet Instructions)**

Use a (v) to indicate yes, or a (X) to indicate no. The fire extinguisher is:

- At its location • Type ABC • Accessible • Tagged • Good condition • Sealed.
- <December of 6<sup>th</sup> year after year of manufacture (if extinguisher is changed out, line thru date and record new one)

Station	Location	Loc	Type	Acc	Tag	Cond	Seal	<6 YR	Initials
W1	225BC S. entrance door	✓	✓	✓	✓	✓	✓	2011	S.P.B.
W2	Standby Diesel Bldg. inside entrance door	✓	✓	✓	✓	✓	✓	2014	S.P.B.
W3	HVAC East, east wall	✓	✓	✓	✓	✓	✓	2015	S.P.B.
W4	HVAC West, west wall by MCC #1	✓	✓	✓	✓	✓	✓	2015	S.P.B.
W5	225BD, inside entrance door	✓	✓	✓	✓	✓	✓	2013	S.P.B.
W8	225B, main entrance	✓	✓	✓	✓	✓	✓	2012	ML
W11	Cold Manipulator Shop, north wall	✓	✓	✓	✓	✓	✓	2015	ML
W12	Operating Gallery, elevator door	✓	✓	✓	✓	✓	✓	2015	ML
W13	Hall by Hot Manipulator Shop	✓	✓	✓	✓	✓	✓	2015	J.H.C.
W14	Service Gallery, south wall	✓	✓	✓	✓	✓	✓	2015	J.H.C.
W15	Truck Port, north wall	✓	✓	✓	✓	✓	✓	2012	ML
W16	AMU, south exit door	✓	✓	✓	✓	✓	✓	2012	ML
W17	AMU, next to east transmitter room	✓	✓	✓	✓	✓	✓	2012	ML
W18	Manipulator repair shop, north exit door	✓	✓	✓	✓	✓	✓	2015	ML
W19	Manipulator repair shop, north wall	✓	✓	✓	✓	✓	✓	2015	ML
W21	AMU, south wall on mezzanine	✓	✓	✓	✓	✓	✓	2012	ML
W24	225BE, east exit door	✓	✓	✓	✓	✓	✓	2013	ML
W25	225BE, north wall of grinding room	✓	✓	✓	✓	✓	✓	2013	ML
W26	225BE, middle of shop	✓	✓	✓	✓	✓	✓	2013	ML
W27	225BE, SW corner of men's change room	✓	✓	✓	✓	✓	✓	2013	ML
* W28	225BE, exterior of North shop wall east end (hot work only)	✓	✓	✓	✓	✓	✓	2012	J.H.C.
W29	225B RM 110	✓	✓	✓	✓	✓	✓	2011	ML
W30	225BG, Pump Rm Wall	✓	✓	✓	✓	✓	✓	2012	S.P.B.
W31	225BG, Pump Rm Wall	✓	✓	✓	✓	✓	✓	2015	S.P.B.
W32	225BG, Chem Rm Wall	✓	✓	✓	✓	✓	✓	2013	ML
W33	225BG, LCU Rm Wall	✓	✓	✓	✓	✓	✓	2013	S.P.B.

\* May be in use at Containment Tent on South Side of 225B

**WESF: MONTHLY FIRE EXTINGUISHER INSPECTION (FIRE)**  
 (Data Sheet Instructions)

Station	Location	Loc	Type	Acc	Tag	Cond	Seal	<6 YR	Initials
W34	225BG Diesel Gen. Bldg	✓	✓	✓	✓	✓	✓	2013	S.P.B.
53	282B, Deep Well Pump Bldg.	✓	✓	✓	✓	✓	✓	2012	SM
54	MO-2237 NW Exit	✓	✓	✓	✓	✓	✓	2015	S.P.B.
57	MO-134	✓	✓	✓	✓	✓	✓	2015	SM
58	MO-135	✓	✓	✓	✓	✓	✓	2015	SM
59	MO-133	✓	✓	✓	✓	✓	✓	2015	SM
103	225BE Lunchroom	✓	✓	✓	✓	✓	✓	2013	SM
55	272-B, WESF Support Bldg.	✓	✓	✓	✓	✓	✓	2012	S.P.B.
56	272-B, WESF Support Bldg.	✓	✓	✓	✓	✓	✓	2012	S.P.B.
84	272-BA, Material Bldg.	✓	✓	✓	✓	✓	✓	2012	SM
88	MO-408	✓	✓	✓	✓	✓	✓	2015	SM
85	MO-400 NE Corner	✓	✓	✓	✓	✓	✓	2012	SM
86	MO-400 NW Corner	✓	✓	✓	✓	✓	✓	2012	SM
87	MO-400 SW Corner	✓	✓	✓	✓	✓	✓	2012	SM
60	MO-232 E Exit	✓	✓	✓	✓	✓	✓	2011	SM
108	MO-232-NW Exit	✓	✓	✓	✓	✓	✓	2015	SM
93	MO-410 West Wall	✓	✓	✓	✓	✓	✓	2015	SM
96	226-B, Mixed Waste Storage Pad	✓	✓	✓	✓	✓	✓	2013	SM
97	226-B, Mixed Waste Storage Pad	✓	✓	✓	✓	✓	✓	2013	SM
99	272-BB, Tool Crib	✓	✓	✓	✓	✓	✓	2012	SM
100	Universal Waste Storage Area (HS023)	✓	✓	✓	✓	✓	✓	2015	SM
102	211-BA	✓	✓	✓	✓	✓	✓	2012	SM

Comments:

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Scott D. Barnes      Scott D. Barnes 10-7-16 Time 1300  
 NCO (Print)              Sign  
Michael A. Garity      Michael A. Garity  
 Operations Supervision (Print)      Sign  
  
Brian Biddle              Brian Biddle  
 Operations Supervision (Print)      Sign  
  
10/03/16 0700              Date  
10/7/16                      Date

Perform Inspections/Test of Fire System

Published Date: 05/17/2016

WESF-PRO-OP-51862

Effective Date: 05/17/2016

Appendix D - Fire System Gauges Data Sheet

(Page 1 of 1)

If gauge condition is satisfactory, check "Sat" column. If unsatisfactory, record "D" for damaged, or "NW" for not working properly in the "Unsat" column. If pressure is in range, put ✓ in "As Found" column. If pressure is NOT in range, then enter the reading in the "As Found" column.

Number	Description	Gauge Condition and Indication		PSI Pressure	
		Sat	Unsat	Normal Range	As Found
PI-225B-C26B-3	225B Riser Inlet Gauge	✓		92 - 150	
PI-225B-C26B-1	225B Riser Gauge	✓		92 - 150	
PI-225B-C26B-2	225 Riser Gauge	✓		92 - 150	

Comments:

Michael A. Garity M. Garity NCO (Print)	Michael A. Garity M. Garity Sign	0700 10/03/16 Date
Joseph R. Ginn Operations Supervision (Print)	J. Ginn Sign	10-4-16 Date

Perform Inspections/Test of Fire System

Published Date: 05/17/2016

WESF-PRO-OP-51862

Effective Date: 05/17/2016

Appendix A - Monthly Valve Inspection Data Sheet

(Page 1 of 1)

This monthly primary control valve inspection is to determine the following:

- a) If valves are properly identified with ID tag/label.
- b) If valves are in their required position.
- c) If seals for the valves are intact.

Use a checkmark (✓) if condition is satisfactory or an (X) if condition is NOT satisfactory to indicate status for required position, sealed, locked, or ID tag/label. Circle "sealed" in addition to (✓) or (X) if seal was removed for position verification.

Notes: OS&Y valves that require a T-handle to operate are indicated with a (†)  
H-2-825969 shows location of valves inspected.

PRIMARY VALVES

Valve	Location	Required Position		Sealed		ID Tag/Label	
			(✓/X)	(✓/X)	(✓/X)	(✓/X)	(✓/X)
225-R	N of 225B (on lawn)	OPEN	✓	Locked	✓	Yes	✓
26-R	PIT 225-VP-02, approx. 40 ft east of 282-B (Inactivated in open position)	OPEN	NA	Sealed	NA	Yes	NA
294B-600-1	294B inlet, N of RBFP	OPEN	✓	Sealed	✓	Yes	✓
294B-600-3	294B disch, N of RBFP	OPEN	✓	Sealed	✓	Yes	✓
294B-600-8	294B inlet, S of RBFP	OPEN	✓	Sealed	✓	Yes	✓
294B-600-10	294B disch, S of RBFP	OPEN	✓	Sealed	✓	Yes	✓
18-R (†)	≈ 20' NW of 294-B	OPEN	NA	Sealed	✓	Yes	✓
22-R (†)	≈ 60' SE of 225-BG	OPEN	↓	Sealed	✓	Yes	✓
91-S (†)	≈ 60' SE of 225-BG	OPEN	↓	Sealed	✓	Yes	✓
99-S (†)	≈ 30' NW of 225-BC	OPEN	↓	Sealed	✓	Yes	✓

Comments

James Simmons  
SOE (Print)

James Simmons  
Sign

10-3-16 (1430)  
Date

JOSEPH B. GILL  
Operations Supervisor (Print)

JOSEPH B. GILL  
Sign

10-4-16  
Date

COPY



# PM/S Data Sheet 2C-16-05033 2C-31761

(Free Form)

[FSF]

08/23/2016 10:52 AM

Page 3 of 3

<b>Doc Num</b>	<b>PM/S Num</b>	<b>D/S Status</b>	<b>Record Status</b>
2C-16-05033 /P	2C-31761	OPEN	ACT
<b>Work Item Title</b> WESF: SEMI-ANN PORTABLE EYEWASHES CLEAN <09/30>			<b>Record Copy Printed</b> Yes 1

### Data Sheet Body

#### Instructions

SEE ATTACHED INSTRUCTIONS

#### Calibrated Standards/Equipment

Standard/Equipment	Exp Date

*N/A*

#### Resources

Code	Description	No.	Act Hrs
24	PIPEFITTER	1	8

#### Comments

10-24-16 - WESF ECO Dave Watson notified Maint. Mgr. Scott Garrison that eye wash stations fall under the print/sign, date/time requirement. The person who signed this data sheet will resign with complete name, print & sign. Adding approx. time work was completed.

*Scott Garrison RM 10-24-16*

<b>Work Complete Date</b>	<u>9-28-16</u>	<b>Signature (Print/Sign)</b>	<b>Date</b>
<b>Completed Satisfactory</b>	<input checked="" type="radio"/> Yes / <input type="radio"/> No (circle one)	<i>Scott Garrison</i>	<u>9-28-16</u>
<b>Data Sheet Complete</b>	<input checked="" type="checkbox"/>	<i>Scott Garrison</i>	<b>Time:</b> <u>9:30 AM</u>
		<i>10-24-16</i>	<i>10-24-16</i>



M-06

DECON SHOWER

Perform an inspection and test of the Decontamination Shower located in the SWP Lobby (Room 105).

**DO NOT** run water directly to the shower drain as it drains to TK-100.

Run Decon Shower water thru a hose out the exterior door or into bucket until water runs clear.

Comments/remarks NONE  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

NCO:

PRINT First & Last NAME: Jim Wabauisa

SIGNATURE: [Signature] Date: 10-07-2016 Time: 1300

SOM:

PRINT First & Last NAME: Brian Biddle BB

SIGNATURE: [Signature] Date: 10/7/16