



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

17-ESQ-0004

OCT 28 2016

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

Dear Ms. Smith:

DANGEROUS WASTE COMPLIANCE INSPECTION ON JANUARY 12 – FEBRUARY 11, 2016, AT THE U.S. DEPARTMENT OF ENERGY (DOE) HANFORD SITE, RESOURCE CONSERVATION AND RECOVERY ACT (RCRA) SITE ID: WA7890008967, NUCLEAR WASTE PROGRAM (NWP) COMPLIANCE INDEX NO. 16.553

This letter is in response to the September 7, 2016, (16-NWP-153) letter regarding the Hanford Sitewide Dangerous Waste Personnel Training Compliance Inspection of January 12 – February 11, 2016.

This letter provides the DOE Richland Operations Office's (RL) response to the first of two compliance issues identified in the Compliance Inspection Report transmitted via Letter 16-NWP-153, listed below. The DOE Office of River Protection will be providing a response to the second compliance issue identified in Letter 16-NWP-153.

1. Hanford Sitewide Dangerous Waste (DW) Permit, Permit Condition II.C.1. The Permittees will conduct personnel training as required by Washington Administrative Code (WAC) 173-303-330. The Permittees will maintain documents in accordance with WAC 173-303-330(2) and (3). Training records may be maintained in the Hanford Facility Operating Record, or on electronic data storage.

WAC 173-303-330(2). Written training plan. The owner or operator must develop a written training plan, which must be kept at the facility and which must include the following documents and records:

Observations: Ecology observed that no written DW training plans were developed for the 183-H Solar Evaporation Basins and the 300 Area Process Trenches. Ecology was told by CH2M HILL Plateau Remediation Company Groundwater Monitoring personnel that unit inspections and groundwater monitoring activities take place at these two unit groups. Ecology observed that these activities are not covered in any unit group DW training plan.

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Action Required: Within 60 days of receipt of this compliance report, RL must develop written DW training plan(s) for 183-H Solar Evaporation Basins and 300 Area Process Trenches and place the DW training plan(s) in each unit group's operating record. Within 60 days of receipt of this compliance report, RL must contact Ecology permitting to determine the path for incorporating this DW training information into the Hanford Sitewide DW Permit.

Per WAC 173-303-806(4)(o), Permittees are not required to prepare training program documentation for Post-Closure Units (PCUs), except under certain conditions that are not currently present. Such conditions occur when Ecology, through the Permit Development Process, determines that this information is required. The Permit Development Process has already taken place, and training documentation obligations have been addressed. Training Program information is provided in the Permit (Part VI, PCU-2, Change 5.0 and PCU-1, Change 8.0/Section 8.3). Also, Attachment 5, Section 5.1.1.1, describes General Hanford Facility Orientation Training.

Groundwater Monitoring is the primary activity conducted at the subject PCUs. Accordingly, the training information provided in Part VI focuses on Groundwater Monitoring.

The Training Program information provided in Permit Revision 8.c meets and/or exceeds underlying WAC 173-303 requirements for PCUs. Pursuant to WAC 173-303-806(4)(o), preparation of additional and/or separate DW training documentation for the subject PCUs is not required, unless the Permit is modified accordingly.

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

Sincerely,


Doug S. Shoop
Manager

ESQ:DBC

cc: See page 3

Ms. Alexandra K. Smith
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cc: Dave B. Bartus, EPA Seattle
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Ron R. Skinnerland, Ecology
Ray T. Swenson, CHPRC
Michael J. Turner, MSA
Joel F. Williams, Jr., CHPRC
Administrative Record (183-H/300 APT)
Environmental Portal, G3-35
HF Operating Record (J. K. Perry, MSA A3-01)
NWP Reader File