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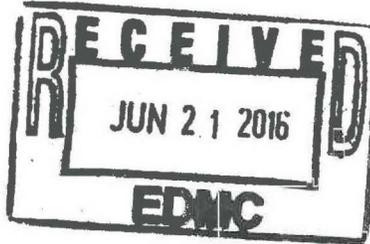
STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

3100 Port of Benton Blvd • Richland, WA 99354 • (509) 372-7950

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June 15, 2016

16-NWP-106



Ms. Stacy Charboneau, Manager
Richland Operations Office
United States Department of Energy
PO Box 550, MSIN: A7-50
Richland, Washington 99352

Re: Determination on Revision to DOE/RL-98-35, Rev. 3, Surveillance and Maintenance Plan for
the Plutonium-Uranium Extraction (PUREX) Facility 1217159

Reference: Letter 16-ESQ-0058, dated May 3, 2016, from S. Charboneau, USDOE-RL, to
A. Smith, Ecology, "Dangerous Waste Compliance Inspection on March 12, 2015, at the
Plutonium Uranium Extraction (PUREX) Plant and Storage Tunnels, Resource
Conservation and Recovery Act (RCRA) Site ID: WA7890008967, Nuclear Waste
Program (NWP) Compliance Index No. 15.517"

1238292

Dear Ms. Charboneau:

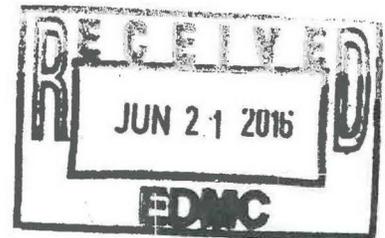
The Department of Ecology (Ecology) received the United States Department of Energy – Richland
Operations Office (USDOE-RL) letter 16-ESQ-0058 with the attached Enclosure 1, containing the
revision to DOE/RL-98-35, Rev. 3, Surveillance and Maintenance Plan, for the PUREX Facility.

Ecology reviewed the revisions to DOE/RL-98-35, Rev. 3, and our Review Comment Record is
enclosed. In accordance with the *Hanford Federal Facility Agreement and Consent Order*, Action
Plan Section 9, Document Review and Comment Process, USDOE-RL must respond within 30 days
(July 18, 2016) upon receipt of this letter.

If you have any questions, please contact Stephanie Schleif, Project Manager, at (509)372-7929 or
stephanie.schleif@ecy.wa.gov or, or John Temple, Permit Writer, at (509)372-7940 or
john.temple@ecy.wa.gov.

Sincerely,

Ron Skinnarland
Waste Management Section Manager
Nuclear Waste Program



jt/tkb
Enclosure

cc: See page 2



Ms. Stacy Charboneau
June 15, 2016
Page 2

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cc electronic w/enc:

Dave Bartus, EPA
Dennis Faulk, EPA
Mike Collins, USDOE
Al Farabee, USDOE
Jane Borghese, CHPRC
John Ciucci, CHPRC
Brian Dixon, CHPRC
Ray Swenson, CHPRC
Joel Williams, Jr., CHPRC
Jerry Cammann, MSA
Carolyn Noonan, MSA
Jon Perry, MSA
Rob Piippo, MSA
Ken Niles, ODOE
Suzanne Dahl, Ecology
Kelly Elsethagen, Ecology
Edward Holbrook, Ecology
John Price, Ecology
Stephanie Schleif, Ecology
Ron Skinnarland, Ecology
Alex Smith, Ecology
John Temple, Ecology
USDOE-RL Correspondence Control
Environmental Portal
Hanford Facility Operating Record

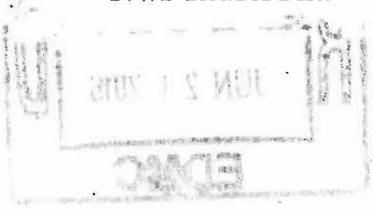


cc w/enc:

Steve Hudson, HAB
Administrative Record
NWP Central File

cc w/o enc:

Rod Skeen, CTUIR
Gabriel Bohnee, NPT
Russell, Jim, YN
NWP Reader File



Review Comment Record

Washington State Department of Ecology Nuclear Waste Program

Date: June 16, 2016

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Document Title(s)/Number(s)

DOE/RL-98-35, Rev. 3, PUREX Surveillance and Maintenance Plan Review

Document Manager

Project Manager

Facility Site ID

Cleanup Site ID

Comments on PUREX Surveillance and Maintenance Plan		Stephanie Schleif	(509) 372-7929	CUG - 25, WA7890008967		
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Item No.	Pg. # Sec. # Para./Sent.	Comment or Question	Modification Needed	Basis/Justification	U.S.D.O.E. Response	Ecology Response	Open/Close	Reviewer Initials
1	General	Section 8.6 was removed from Section 8 of the TPA during past changes. However, the Surveillance and Maintenance (S&M) Plan refers Section 8.6 several times.	Remove reference to Section 8.6 throughout the document.					
2	Pg. 1-2, Section 1, lines 3-4	Table 6-1 refers out to other sections to describe how regulatory requirements are being met. The enforceable requirements are established in WAC 173-303. Table 6-1 only describes how B Plant will comply.	Remove this sentence, "The enforceable requirements in this document are found in Table 6-1; other dialogue and descriptions are for informational purposes only."					
3	Pg. 6-1, Section 6, line 11	DOE O 450.1A is the most current version.	Change "450.1" to "450.1A"					
4	Table 6-1, Citation WAC 173-303-010 to -120	The requirements for WAC 173-303-010 to -120 deal with: <ul style="list-style-type: none"> • Introductory Regulations • Dangerous Waste Designation • General Recycling Requirements 	Under the Requirement column, delete "Generator Requirements" and replace it with the 3 bulleted items. <ul style="list-style-type: none"> • Introductory Regulations • Dangerous Waste Designation • General Recycling Requirements 					
5	Table 6-1, Citation WAC 173-303-280 to -282	WAC 173-303-280 are the general requirements for dangerous waste management facilities, which are applicable to the Dangerous Waste Management Units in the PUREX facility.	"WAC 173-303-280 to -282" needs to be changed to "WAC 173-303-281 to -282".					
6	Table 6-1, Citation WAC 173-303-340	Section 8 of the S&M Plan is vague and does not demonstrate that certain hazards do not pose a risk to the facility. If this was to be demonstrated in Section 8, it would relieve PUREX from meeting specific requirements identified in WAC 173-303-340(1)(a) through -340(1)(d).	Demonstrate in the S&M Plan that hazards do not pose a risk to the facility, which would relieve them from meeting the requirements identified in 340(1)(a) through 340(1)(d).					

Review Comment Record

**Washington State Department of Ecology
Nuclear Waste Program**

Date: June 16, 2016

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Item No.	Pg. # Sec. # Para./Sent.	Comment or Question	Modification Needed	Basis/Justification	U.S.D.O.E. Response	Ecology Response	Open/Close	Reviewer Initials
7	Table 6-1, Citation WAC 303-360	The actions of the emergency coordinator as described in WAC 173-303-360 are applicable.	If these actions are conveyed in the Hanford Emergency Management Plan, DOE-0223 or the Building Emergency Plan, then reference what the emergency coordinator will work to.					
8	Table 6-1 Citation 40 CFR 265 Subpart G and 265.197	"Closure plans will be developed during the disposition phase." Under Subpart G, U.S. Department of Energy and CH2M HILL Plateau Remediation Company are required to maintain a closure plan in their operating record.						
9	Table 6-1, Citation 265.1101	The documentation regarding the monitoring of differential pressure should be incorporated into the inspection schedule.	Include the monitoring of differential pressure into the inspection schedule. Demonstrate how the monitoring of differential pressure ensures the integrity of the Containment Building.					