



**OFFICE OF RIVER PROTECTION**

P.O. Box 450, MSIN H6-60  
Richland, Washington 99352

**JAN 07 2016**

15-ECD-0064

Ms. Jane A. Hedges, Program Manager  
Nuclear Waste Program  
Washington State  
Department of Ecology  
3100 Port of Benton Blvd.  
Richland, Washington 99354

Ms. Hedges:

**RESPONSE TO SINGLE-SHELL TANK DANGEROUS WASTE COMPLIANCE INSPECTION ON MARCH 30 AND 31, 2015, AT THE HANFORD SITE RESOURCE CONSERVATION AND RECOVERY ACT SITE ID: WA7890008967, NUCLEAR WASTE PROGRAM COMPLIANCE INDEX NO. 15.518**

Reference: Ecology letter from J. Mathey to K.W. Smith, ORP, and M. Lindholm, WRPS, "Single-Shell Tank Dangerous Waste Compliance Inspection on March 30 and 31, 2015 at the Hanford Site, Resource Conservation and Recovery Act (RCRA) Site ID: WA7890008967, Nuclear Waste Program (NWP) Compliance Index No. 15.518," 15-NWP-196, dated November 4, 2015.

This letter responds to your Inspection Report (Reference) regarding a compliance inspection of the Single-Shell Tank System performed on March 30 and 31, 2015. The report requires a response within 60 days of receipt of the Report (Report received on November 10, 2015). The U.S. Department of Energy, Office of River Protection and Washington River Protection Solutions LLC have reviewed the four items of non-compliance with the Dangerous Waste Regulations identified by Washington State Department of Ecology in the report. The attached information provides responses to each of these four items.

In addition, six concerns were noted in the inspection report. By agreement among the Office of River Protection, Washington River Protection Solutions LLC, and Nuclear Waste Program, in a meeting held December 2, 2015, the six concerns are not addressed herein.

Ms. Jane A. Hedges  
15-ECD-0064

-2-

JAN 07 2016

If you have any questions, please contact Bryan R. Trimmerger, Environmental Compliance Division, (509) 376-2674, or Jessica A. Joyner, Washington River Protection Solutions LLC, (509) 376-7533.



Mark A. Lindholm  
President and Project Manager  
Washington River Protection Solutions LLC



Kevin W. Smith, Manager  
Office of River Protection

ECD:BRT

Attachment:  
Response to Findings

cc w/attach:

J.J. Lyon, Ecology  
J.W. Mathey, Ecology  
J.B. Price, Ecology  
M. Walmsley, Ecology  
C.L. Whalen, Ecology  
M.R. Greene, WRPS  
W.F. Johnson, WRPS  
J.A. Joyner, WRPS  
A.L. Prignano, WRPS  
J.A. Voogd, WRPS  
Administrative Record (S-2-4)  
Environmental Portal, LMSI  
WRPS Correspondence

cc w/o attach:

D.J. Alexander, Ecology  
C.E. Clark, RL

Attachment  
15-ECD-0064  
(9 Pages)

Response to Findings

RESPONSE TO FINDINGS

item	Ecology Finding	Ecology Action Required	ORP/WRPS Response
1	<p>WAC 173-303-400(3), as referenced by the Hanford Facility Resource Conservation and Recovery Act Permit, Dangerous Waste Portion Revision 8C - Condition I.A Effect of Permit.</p> <p>WAC 173-303-310, Security (2). A facility must have: (a) Signs posted at each entrance to the active portion, and at other locations, in sufficient numbers to be seen from any approach to the active portion. Signs must bear the legend, "Danger-unauthorized personnel keep out," or an equivalent legend, written in English, and must be legible from a distance of twenty-five feet or more;</p> <p>WAC 173-303-040, Definitions, "Active portion" means that portion of a facility -which is not a closed portion, and where dangerous waste recycling, reuse, reclamation, transfer, treatment, storage or disposal operations are being or have been conducted after: The effective date of the waste's designation by 40 C.F.R. Part 261; and March 10, 1982, for wastes designated only by this chapter and not designated by 40 C.F.R. Part 261</p>	<p>Within 60 days of receipt of this report, post in sufficient numbers to be seen from any approach to the active portions of all- SST tank farms, signs bearing the legend, "Danger unauthorized personnel keep out," or an equivalent legend, written in English, and legible from a distance of twenty-five feet or more. Within 60 days of receipt of this report, submit to Ecology, evidence that the signs were posted. The response must include the language used on the signs, the locations where the signs were posted, and a written verification that the signs are legible from a distance of twenty-five feet or more. Note that this should also be done on B, BX, BY, and C Tank Farms that did not have the perimeter walked during the field inspection.</p> <p>Additionally, within 60 days of receipt of this report, develop and submit to Ecology, an inspection schedule (WAC 173-303-320(2)) for these new signs and conduct inspections according to that schedule.</p>	<p>In regards to the finding pertaining to the number and location of signs, WRPS and ORP believe that the SST System is in compliance with Permit Condition II.M and the security provisions of WAC 173-303-310, because of the Hanford Site security and security at the unit (e.g. fencing, existing signs).</p> <p>In addition, security sign requirements are being discussed as part of the workshops on the Revision 9 to the Hanford Facility Dangerous Waste Permit. Agreements resulting from the permit workshops will determine the final requirements for the signs.</p> <p>In the interim, WRPS will install additional signs at the Single-Shell Tank farms that bear the legend "Danger Unauthorized Personnel Keep Out" or an equivalent legend. These signs are being fabricated and will be installed as they become available. Once installed, the weekly rounds will be revised to include inspection of these signs.</p> <p>ORP and WRPS will inform Ecology once the additional signs have been installed.</p>

<p>2</p> <p>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.</p> <p>WAC 173-303-320 General Inspection (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.</p>	<p>Immediately upon receipt of this report, include the date and time of the inspection, the printed name and the handwritten signature of the inspector, notations for observations made, and the date and nature of any repairs or remedial actions taken on all dangerous waste inspection records that help prevent, detect, or respond to hazards to the public health or the environment. Be sure that the inspection records include the following equipment related to dangerous waste inspections:</p> <ul style="list-style-type: none"> <li>• Monitoring equipment</li> <li>• Safety and emergency equipment</li> <li>• Security devices</li> <li>• Operating and structural equipment</li> </ul> <p>Also place a notation in the SST operating record for the inspections performed prior to the date of receipt of this inspection report, stating that all required information (i.e. the WAC 173-303-320(2)(d) requirements) was not included in the inspection record. Submit to Ecology within 60 days of receipt of this report, documentation that the notation was recorded in the operating record.</p>	<p>WRPS and ORP met with Ecology to discuss Ecology's concern with inspection records and completeness of records. This discussion included information for Ecology on pending changes to the procedures and an increase in communication regarding methods for documentation of observations and associated corrective action. WRPS and ORP understands that some existing records are incomplete. WRPS will continue to work with ORP and Ecology to ensure Dangerous Waste inspection documents meet the intent of WAC 173-303-320.</p> <p>WRPS has completed an extensive review of inspection records required by WAC 173-303-320 to identify those that need to have procedures and forms updated to address WAC 173-303-320(2)(d) requirements. The surveillance procedures have space available for notations and observations. Standard WRPS processes are being followed to update these procedures to fully address all the WAC 173-303-320(d)(2) requirements.</p> <p>As a compensatory measure, a Required Reading was sent to all WRPS employees on November 9, 2015, stating that individuals signing Dangerous Waste Inspection documents subject to WAC 173-303-320 must completely fill out the inspection forms by printing their full names and signing the record (see Enclosure 1). Internal</p>
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			<p>procedures are being modified to document and communicate this expectation.</p> <p>If additional incomplete records are identified, beyond those noted in the Ecology inspection report, WRPS will work to ensure that Dangerous Waste inspection documents meet the intent of WAC 173-303-320(2)(d).</p>
3	<p>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(3). The owner or operator must remedy any problems revealed by the inspection, on a schedule which prevents hazards to the public health and environment. Where a hazard is imminent or has already occurred, remedial action must be taken immediately.</p>	<p>Within 60 days of receipt of this report, remedy problems revealed during the above cited January 20, 2014 inspection of 241-BX-106 and the March 7, 2014 inspection of 241-BY-109. Within 60 days of receipt of this report, report to Ecology that these remedies have taken place.</p>	<p>Remedies to problems identified during waste site surveillance inspections are in progress. Open conduit at 241-BX-106 is being closed through Work package WO-136098. Materials are on order to cap the conduit. Capping will be completed following arrival of materials.</p> <p>Valve handles were pulled from the 241-BY-109 pump pit prior to receipt of the Ecology inspection report. Temporary covers were placed over the pit cover openings (see Enclosure 2). Work package WO-173566 has been prepared to complete the sealing of the pit. Foaming of the pit is planned to occur after weather conditions are consistent with manufacturer recommendations for application (Spring 2016).</p>
4	<p>WAC 173-303-400(3), as referenced by the Hanford Facility Resource Conservation and Recovery Act Permit, Dangerous Waste Portion Revision 8C - Condition I.A Effect of Permit. 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</p>	<p>Within 60 days of receipt of this report, update and submit to Ecology, a revision to TFC-PLN-07, Revision B, Dangerous Waste Training Plan, to replace course number 020380 Transportation Security Plan for Shippers/Warehouse with training course number 351568 WRPS Transportation Security Plan for Shippers.</p>	<p>TFC-PLN-07, Dangerous Waste Training Plan, has been updated to replace the inactive course number 020380, <i>Transportation Security Plan with 351568 WRPS Transportation Security Plan for Shippers</i>. Updated pages are provided in Enclosure 3.</p>

	documents and records: (b) A written description of the type and amount of both introductory and continuing training required for each position.		
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**Text of Required Reading**

During a recent review of a Department of Ecology surveillance, one finding identified that WRPS was not consistently printing the full name of the individual signing the record document. As a compensatory measure, this required reading is being issued to all employees to ensure those completing record documents are printing their full name and signing the record. TFC-BSM-IRM\_DC-C-01 and 02 are being modified to document and communicate this expectation.

**Photographs of BY-018, BY-019 Saltwell Pump Pit  
Showing before and after removal of valve handles and placement of temporary covers.**



**BEFORE**



**AFTER**

**Updated Training Plan**  
Change bars (on right) indicate location of added or deleted text.

<b>MANAGEMENT PLAN</b>	Document	<b>TFC-PLN-07, REV B-1</b>
<b>DANGEROUS WASTE TRAINING PLAN</b>	Page	6 of 8
	Issue Date	December 7, 2015

Chapter 8 Training Category	Training Category					
	General Hanford Facility Training	Contingency Plan Training	Emergency Coordinator Training	Operations Training		
TOC Dangerous Waste Training Plan implementing category	Orientation Program	Emergency Hazards Check List	Building Emergency Training	General Waste Management	Container Management	Tank System Management
Dangerous Waste Worker Categories						
Waste Worker	358001 350761 350540 <sup>1</sup>	350761 350540 <sup>1</sup>	350761 350540 <sup>1,7</sup>	350560	350560	350340 <sup>1</sup> 350402 <sup>1,7</sup> 350400 <sup>1,7</sup>
Advanced Waste Worker	358001 350761 350540 <sup>1</sup>	350761 350540 <sup>1</sup>	350761 350540 <sup>1,7</sup>	350560	035010 <sup>2</sup> 035012 <sup>2</sup> 351032 <sup>2</sup> 020078 <sup>3</sup> 351024 <sup>4</sup> 020081 <sup>4</sup> 351568 <sup>4</sup> 050410 <sup>4</sup> 351033 <sup>4</sup> 350166 <sup>4,7</sup> 350560	
Waste Worker Supervisor Manager	358001 350761 350540 <sup>1</sup>	350761 350540 <sup>1</sup>	350761 350540 <sup>1,7</sup>	350560		
Building Emergency Director	358001 350761 350540 <sup>1</sup>	350761 350540 <sup>1</sup>	35E001			

- <sup>1</sup> Applies only to Nuclear Chemical Operators.
- <sup>2</sup> Applies only to personnel who perform Waste Designation duties.
- <sup>3</sup> Applies only to personnel who perform On-Site Shipping.
- <sup>4</sup> Applies only to personnel who perform Off-Site Shipping.
- <sup>5</sup> Applies only to 242-A Evaporator.
- <sup>6</sup> Applies only to Waste Operations Group Nuclear Chemical Operators.
- <sup>7</sup> Training received is commensurate with the duties performed. Individuals in this category who do not perform these duties are not required to receive this training.

**3.4.1 Training Courses**

- 020078 ADVANCED MIXED WASTE SHIPPER CERTIFICATION TRAINING
- 020081 VEHICLE INSPECTION FOR TRAFFIC PERSONNEL
- 035010 WASTE DESIGNATION
- 035012 WASTE DESIGNATION QUALIFICATION
- 050410 LOAD SECUREMENT FOR DRIVERS AND TRAFFIC PERSONNEL
- 350166 TOC WASTE OPERATIONS SURVEILLANCE & INSPECTION – QUALIFICATION
- 350340 TOC OPERATOR BASE CERTIFICATION
- 350400 242-A EVAPORATOR OPERATIONS - BACKSIDE OPERATOR QUALIFICATION
- 350402 242-A EVAPORATOR CONTROL ROOM OPERATOR – CERTIFICATION
- 350540 242-A EVAPORATOR FACILITY ORIENTATION and FEHIC –CBT
- 350560 TOC WASTE HANDLING, SEGREGATION, AND PACKAGING
- 350761 TANK FARM FACILITY ORIENTATION and FEHIC –CBT

<b>MANAGEMENT PLAN</b>	<b>Document</b>	<b>TFC-PLN-07, REV B-1</b>
<b>DANGEROUS WASTE TRAINING PLAN</b>	<b>Page</b>	<b>7 of 8</b>
	<b>Issue Date</b>	<b>December 7, 2015</b>

- 351024 ON-SITE SHIPPER
- 351032 WASTE DESIGNATOR
- 351033 OFF-SITE SHIPPER
- 351568 WRPS TRANSPORTATION SECURITY PLAN FOR SHIPPERS
- 358001 TANK FARM CONTRACTOR HGET-FULL - CBT
- 35E001 TOC EMERGENCY RESPONSE ORGANIZATION FACILITY SPECIFIC TRAINING

**3.5 Job-Specific Facility Training**

The TOC-specific and job-specific qualifications and/or certifications are maintained according to contractual and regulatory requirements. WRPS management uses an electronic training database to ensure personnel they assign to work in the tank farms meet current training requirements. The qualification lists, generated using an electronic training database are updated on a daily basis.

**3.6 Training Records**

Training records, as described in WAC 173-303-330, consist of documentation for completed training. Training records associated with personnel identified in the dangerous waste training plan are maintained in accordance with DOE/RL-91-28, Chapter 8.0. Hanford facility training records include both electronic data storage and hard copies. (5.1.1.e)

The course completion documentation contains the course number, course title, and date of completion. Original records are sent to the Mission Support Contractor (MSC) Training Records for processing. The original hard copy training records are then transferred to the Records Holding Facility in Richland, Washington for scanning and temporary storage. After approximately one year, the original hard copy training records are archived at the permanent record storage center in Renton, Washington. Course completion documentation of former employees is maintained in accordance with DOE/RL-91-28, Chapter 8.0, and Hanford Facility RCRA Permit, General Facility Condition III.1, Regarding Facility Operations Record.

When a training record is requested during an inspection, an electronic data storage record will initially be provided. If the electronic data storage record does not satisfy the inspection concern, a hard copy training record will be provided. Training records of former employees may not be available through computers at TOC and may require a representative from MSC Training to access this information.

**4.0 DEFINITIONS**

No terms or phrases unique to this plan are used.