



## OFFICE OF RIVER PROTECTION

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

JAN 08 2016

16-ECD-0002

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

Ms. Hedges:

### REQUEST FOR A 30-DAY EXTENSION FOR THE ALLOWABLE ACCUMULATION PERIOD OF THE AP-02A PUMP

The purpose of this letter is to request a 30-day extension for the allowable accumulation period of the upper section of the AP-02A pump from the Washington State Department of Ecology. This request is being made as additional time is required to complete packaging the pump so that it meets U.S. Department of Transportation requirements and Permafrix Northwest acceptance requirements.

The upper section of the AP-02A pump was pulled from the tank on October 13, 2015, and staged pending packaging. The 90-day clock on the upper section expires January 11, 2016. As a result of delays due to inclement weather, schedule and resource limitations (crane availability, work space limitations, and construction resources) there is a priority conflict between the disposal of the upper section of the AP-02A pump and other activities related to the preparation for AY-102 retrieval. The pump was scheduled to be packaged on January 6, 2016, however weather conditions delayed packaging the upper section of the AP-02A pump. As such, a 30-day extension for waste disposal is needed. The following bullets provide additional information regarding the delay:

- The AP-02A mixer pump was removed from AP-102 to be replaced by a new supernatant pump designed to support AY-102 retrieval to AP-102.
- Testing operations conducted on the new AP-02A supernatant pump are on the AY-102 recovery project critical path to the start retrieval operations before the AY-102 Settlement Agreement deadline of March 4, 2016.
- Test operations are being delayed by pit equipment technical issues and adverse weather conditions, and are now interfering with operations setup to prepare the motor section of the AP-02A Mixer Pump, for packaging and shipment for disposal.
- Both operations involve work evolutions having to share the same limited resources (Construction crew, crane, and work space).

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Washington River Protection Solutions LLC is working this issue as a high priority but a 30-day extension is necessary. This matter has been discussed in advance with the Washington State Department of Ecology staff.

If you have any questions, please contact Lori A. Huffman, Director, Environmental Compliance Division, (509) 376-0104.



Kevin W. Smith  
Manager

ECD:LAH

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