



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

16-ESQ-0017

**JAN 04 2016**

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

Dear Ms. Hedges:

**RESPONSE TO AREAS OF NON-COMPLIANCE FROM THE T PLANT COMPLEX  
DANGEROUS WASTE COMPLIANCE INSPECTION**

- References:
- (1) Ecology ltr. to S. Charboneau, RL, and J. A. Ciucci, CHPRC, from N. Ware, "Response to Area of Non-compliance from the T Plant Complex Dangerous Waste Compliance Inspection, Nuclear Waste Program Compliance Index No. 15.513," 15-NWP-206, dtd. December 3, 2015.
  - (2) Ecology ltr. to S. Charboneau, RL, and J. A. Ciucci, CHPRC, from N. Ware, "Response to Area of Non-compliance from the T Plant Complex Dangerous Waste Compliance Inspection," 15-NWP-199, dtd. November 9, 2015.

This letter is responding to two of Washington State Department of Ecology (Ecology) letters regarding areas of potential non-compliance that were identified during the T Plant Complex Compliance Inspection that was performed on January 22, 2015.

The following is the response to the open potential non-compliance issue that were identified in Reference 2:

- Non-Compliance 4 - "Place a notation in the T Plant operating record documenting that the inspection record for 11/20/2014 recorded an observation of the containment system as SAT for 214-T, and that the recorded observation was incorrect. Submit a copy of the documentation placed in the T Plant operating record, including the date the documentation was placed into the operating record, to Ecology within 15 days of receipt of this letter."

The U.S. Department of Energy (DOE) Response: On November 12, 2015, Ecology was provided with a copy of the requested information identifying that an entry was made in the T Plant Operation Logbook on November 11, 2015, correcting the observation that was made in the inspection sheet dated November 20, 2014, from "SAT" (satisfactory) to "UNSAT" (unsatisfactory). Reference 1 acknowledges the receipt of this information and states that Ecology is satisfied that the action taken is sufficient to close out this issue.

The following is the response to the open potential non-compliance issue that were identified in Reference 1 and Reference 2:

Non-Compliance Issue 5 – "Failure to include the job title/position for all personnel who perform dangerous waste tasks associated with T Plant in the T Plant Dangerous Waste Training Plan. Ecology issued letter 15-NWP-169, sent September 15, 2015. In our letter, Ecology stated the following, which includes the T Plant training plan area of non-compliance: The violations at these units will remain open violations and will be absorbed in the upcoming site-wide training inspection. No response or action is required for USDOE-RL and CHPRC for the training violations at this time."

DOE Response: The U.S. Department of Energy Richland Operations Office and CH2M HILL Plateau Remediation Company will be discussing this compliance issue with Ecology with the expectation that this compliance issue is being, or will be resolved, through the permitting process and use of the Tier 1/Tier 2 issue resolution processes.

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,



Stacy Charboneau  
Manager

ESQ:ACM

cc: See page 3

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cc: D. B. Bartus, EPA  
J. L. Boller, EPA  
J. W. Cammann, MSA  
J. A. Ciucci, CHPRC  
D. A. Faulk, EPA  
M. N. Jaraysi, CHPRC  
J. W. Mathey, Ecology  
J. B. Price, Ecology  
K. Schanilec EPA  
D. G. Singleton, Ecology  
N. W. Ware, Ecology  
J. F. Williams, Jr., Ecology  
Administrative Record, TSD: T-2-4. (Hard Copy)  
Ecology NWP Library (Hard Copy)  
Environmental Portal, LMSI, A3-95  
HF Operating Record (J. K. Perry, MSA A3-01)