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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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July 3, 2014

14-NWP-132

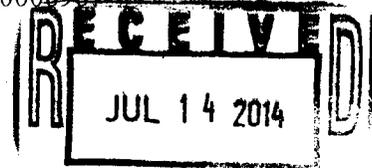
Mr. Kevin Smith, Manager
Office of River Protection
United States Department of Energy
PO Box 450, MSIN: H6-60
Richland, Washington 99352

Ms. Peggy McCullough, Project Director
Bechtel National, Inc.
2435 Stevens Center Place, MSIN: H4-02
Richland, Washington 99354

Re: Approval of 24590-LAW-PCN-ENV-13-005, Class ¹1 Modification to the *Hanford Facility Resource Conservation and Recovery Act Permit, Dangerous Waste Portion, Revision 8C, for the Treatment, Storage, and Disposal of Dangerous Waste, Part III, Operating Unit 10, Waste Treatment and Immobilization Plant (WTP Permit) WA7890008967*

Reference: See page 2

Dear Mr. Smith and Ms. McCullough:



The Department of Ecology approves the referenced Class ¹1 Modification. The approved Hanford Facility RCRA Permit Modification Notification Form is enclosed.

This modification provides the updated *IQRPE Structural Integrity Assessment Report For LAW LVP Caustic Collection Tank (LVP-TK-00001)* to replace the corresponding report in Appendix 9.11 of the WTP Permit.

This modification also provides the updated Mechanical Data Sheet for the LAW Caustic Collection Tank and replaces the Equipment Assembly Drawing for LVP-TK-00001, with the vendor drawings provided in 24590-LAW-VDCN-M-13-00001. Both documents replace the corresponding permit documentation in Appendix 9.6 of the WTP Permit.

If there are any questions regarding this letter, please contact Nitya Chandran, WTP Permit Writer, at nitya.chandran@ecy.wa.gov or (509) 372-7931.

Sincerely,

Dan McDonald
Tank Waste Disposal Project Manager
Nuclear Waste Program

nc/jc
Enclosure

cc: See page 2



Mr. Smith and Ms. McCullough
July 3, 2014
Page 2

14-NWP-132

Reference: Letter 14-ECD-0028, received June 18, 2014, from R.G. Hastings, USDOE-ORP, to J.A. Hedges, Ecology, "Submittal of Hanford Facility Resource Conservation and Recovery Act Permit Modification Notification Form 24590-LAW-PCN-ENV-13-005, updated Low-Activity Waste Facility Integrity Assessment for the Caustic Collection Tank"

cc electronic w/enc:

Dave Bartus, EPA
Dennis Faulk, EPA
Mary Beth Burandt, USDOE
Cliff Clark, USDOE
Paul Harrington, USDOE
Lori Huffman, USDOE
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Gail Laws, WDOH
Nitya Chandran, Ecology
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Jim Cox, CTUIR
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Gabriel Bohnee, NPT

cc w/enc:

Russell Jim, YN
Steve Hudson, HAB
Administrative Record: Waste Treatment Plant (TSD #H-0-8)
BNI Correspondence Control
Environmental Portal
Hanford Operating Record General File

Quarter Ending June 30, 2014

24590-LAW-PCN-ENV-13-005

Hanford Facility RCRA Permit Modification Notification Form
Part III, Operating Unit 10
Waste Treatment and Immobilization Plant

Index

Page 2 of 3: Hanford Facility RCRA Permit, Part III, Operating Unit 10, Waste Treatment and Immobilization Plant. Update the integrity assessment for the Caustic Collection Tank (LVP-TK-00001) associated with the Low Activity Waste (LAW) Secondary Offgas System (LVP) in Appendix 9.11. This modification also requests the update of the *Mechanical Data Sheet for the LAW Caustic Collection Tank* and replacement of the *Equipment Assembly Drawing for LVP-TK-00001* in Appendix 9.6 of the Dangerous Waste Permit.

Submitted by Co-Operator:

R.T. Brock

R. T. Brock

5/18/14

Date

Reviewed by ORP Program Office:

D. L. Noyes

D. L. Noyes

6/17/14

Date

Quarter Ending June 30, 2014

24590-LAW-PCN-ENV-13-005

Hanford Facility RCRA Permit Modification Notification Form			
Unit: Waste Treatment and Immobilization Plant		Permit Part: Part III, Operating Unit 10	
<u>Description of Modification:</u>			
<p>The purpose of this Class 1 prime modification is to update the integrity assessment for the Caustic Collection Tank (LVP-TK-00001) associated with the Low Activity Waste (LAW) Secondary Offgas System (LVP) in Appendix 9.11 of the Dangerous Waste Permit. This modification also requests the update of the <i>Mechanical Data Sheet for the LAW Caustic Collection Tank</i>, and replacement of the <i>Equipment Assembly Drawing for LVP-TK-00001</i> with the vendor drawings provided in 24590-LAW-VDCN-M-13-00001. Both documents are located in Appendix 9.6.</p>			
<u>Appendix 9.11</u>			
Replace	CCN 139508 / AREVA-IA-101, Rev. 0	With	24590-CM-HC4-HXYG-000240-02-00011, Rev 00A
<u>Appendix 9.6</u>			
Replace	24590-LAW-MTD-LVP-P0001, Rev. 0	With	24590-LAW-MTD-LVP-00001, Rev. 1
Replace	24590-LAW-MT-LVP-00004, Rev. 1	With	24590-LAW-VDCN-M-13-00001
<p>The revision to the documents included in this modification is the direct result of the change to LVP offgas system to a negative pressure created by the movement of the LVP exhausters downstream of the LAW Caustic Scrubber. In order to maintain the loop seal in the drain line from the Caustic Scrubber (LVP-SCB-00001) to the LAW Caustic Collection Tank (LVP-TK-00001), the level of the incoming drain line was lowered approximately 6'-2". This change also resulted in the addition of a new tank overflow nozzle at a lower elevation, and the reduction of the operating volume of the tank from 11,919 gallons to 7,325 gallons.</p>			
<u>24590-CM-HC4-HXYG-00240-02-00011, Rev 00A</u>			
<p>The revision of the IQRPE report is a direct result of the change to LVP system to a negative pressure design resulting in the lowering of the Caustic Scrubber (LVP-SCB-00001) loop seal drain line connection to the LAW Caustic Collection Tank (LVP-TK-00001). This change also added a new tank overflow nozzle at a lower elevation that resulted in a reduction of the operating volume of the tank. The previous loop seal drain line and overflow nozzles will be provided with a blind flange and will be designated as spare nozzles.</p>			
<u>24590-LAW-MTD-LVP-00001, Rev. 1</u>			
<p>The following changes were made to datasheet 24590-LAW-MTD-LVP-00001 in Revision 1</p> <ul style="list-style-type: none"> • The maximum operating volume on the mechanical data sheet was reduced from 11,919 to 7,325. • The total volume on the mechanical data sheet was increased from 14,232 to 14,593. • Vendor provided updated vessel weights and added notes to provide supporting calculation references 			
<u>24590-LAW-VDCN-M-13-00001</u>			
<p>The following changes were made to the vendor drawing for LVP-TK-00001 in Vendor Design Change Notice (VDCN) 24590-LAW-VDCN-M-13-00001 (submitted to Ecology in the Milk Run CCN 257037)</p> <ul style="list-style-type: none"> • Designed N01 as Spare W/BLIND flange (old scrubber drain line connection). • Designated N04 as a Spare W/BLIND (old overflow nozzle) • Added new N13 (new caustic scrubber loop seal drain line connection to LVP-TK-00001) • Added new N14 (new LVP-TK-00001 overflow nozzle) 			

Quarter Ending June 30, 2014

24590-LAW-PCN-ENV-13-005

This PCN updates information in Appendices 9.6 and 9.11 to reflect current design. This DWP component may be re-evaluated to confirm design adequacy. If the re-evaluation results in future design changes, the changes will be reviewed by Ecology in subsequent permit modifications.

The following outstanding change documents have been submitted to Ecology pursuant to permit condition III.10.C.9.h and are maintained in the WTP Operating Record.

None

In accordance with Permit Condition III.10.C.2.e, this permit modification sent to Ecology may include page changes to the Permit, attachments, and permit application supporting documentation.

WAC 173-303-830 Modification Class:	Class 1	Class ¹ 1	Class 2	Class 3
Please mark the Modification Class:		X		

Enter relevant WAC 173-303-830, Appendix I Modification citation number: N/A
 Enter wording of WAC 173-303-830, Appendix I Modification citation:

In accordance with WAC 173-303-830(4)(d)(i), this modification notification is requested to be reviewed and approved as a Class ¹1 modification. WAC 173-303-830(4)(d)(ii)(A) states, "Class 1 modifications apply to minor changes that keep the permit current with routine changes to the facility or its operation. These changes do not substantially alter the permit conditions or reduce the capacity of the facility to protect human health or the environment. In the case of Class 1 modifications, the director may require prior approval."

Modification Approved/Concur: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> Denied (state reason below) Reason for denial:	Reviewed by Ecology:  S. Dahl
	Date: 7/10/14