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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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September 29, 1994

Mr. James E. Rasmussen, Acting Program Manager
U.S. Department of Energy
P.O. Box 550
Richland, WA 99352

Mr. Billy D. Shipp, Manager
Engineering Technology Center
Pacific Northwest Laboratories
P.O. Box 999
Richland, WA 99352

Dear Messrs. Rasmussen and Shipp:

Re: Simulated High Level Waste Slurry Treatment and Storage T/S Unit Closure Plan
Revision 6

38-10

This letter formally transmits to the U.S. Department of Energy and Pacific Northwest Laboratories the Notice of Deficiency (NOD) generated by the Washington State Department of Ecology. The Simulated High Level Waste Slurry Closure Plan (SHLWS), Revision 6, was evaluated for compliance with the Dangerous Waste Regulations (WAC 173-303), applicable closure requirements and guidance.

This NOD is to clarify and formally transmit comments generated from review of the Revision 6, SHLWS Closure Plan.

If you have any questions, please call me at (509) 736-3025.

Sincerely,

Greta P. Davis, SHLWS Unit Manager
Nuclear Waste Program



GD:sr
Enclosure

cc: Cliff Clark, USDOE
Ellen Mattlin, USDOE
Roger Bowman, WHC
Fred Ruck III, WHC

Wayne Slater, PNL
Harold Tildon, PNL
Dan Duncan, EPA
Administrative Records

210-763116
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**SIMULATED HIGH LEVEL WASTE SLURRY CLOSURE PLAN, REV. 6
NOTICE OF DEFICIENCY
SEPTEMBER 29, 1994**

No. Concurrence	Comment/Response
1. <u>CHAPTER 1.0, SECTION 1.3, Page 1-5, Line 12:</u>	Correct location of closure area from 1100 Area to 3000 Area.
2. <u>CHAPTER 3.0, SECTION 3.1, Page 3-4, Line 13:</u>	Modify text by adding the Dangerous Waste (DW) Code Numbers next to each constituent listed, i.e., Silver (D011). Link each waste code to the appropriate DW designation characteristic. This section should include all applicable Dangerous Waste Codes listed in the Form 3 Application.
3. <u>CHAPTER 4.0, SECTION 4.0, Page 4-1, Line 29:</u> <i>"No decontamination was necessary . . ."</i>	Include how this conclusion was reached. As the statement stands, there is nothing to substantiate this statement.
4. <u>CHAPTER 4.0, SECTION 4.0, Page 4-6, Line 1:</u> <i>"These remain at the site."</i>	The final version of this closure plan should state the quantity of pallets, what happened to the pallets (portions cut out), where they were sent, i.e., recycled/drummed for DW storage. Clearly identify the methods on which the pallets were dispositioned. (Example: 40 pallets were recycled and 60 had portions with potential contamination spots, the spots were cut out and drummed as DW waste and sent to storage. The remainder of the pallet, after dissection, was recycled.)
5. <u>CHAPTER 4.0, SECTION 4.0, Page 4-7, Line 1, Lines 12 & 13, Lines 19 thru 27, and Line 29:</u> <i>"These samples were tested . . ."</i>	The results of the tests performed need to be incorporated into this section.

"There was no known spillage . . ."

There were two spills addressed in the Data Quality Objective (DQO) process meetings that were made during transfer of materials from one point to another. Indicate whether the fork-lift truck and other associated equipment surveyed after the spill? If so, state why the equipment required no decontamination.

This paragraph needs to include information on how the area of the spill was affected. It is also inconsistent with the preceding and following paragraphs. Modify text for consistency.

". . . the storage area when a drum was being moved . . ."

How was the drum being moved? If by fork-lift, was there possible contamination on the fork-lift resulting from the spill?

6. **CHAPTER 6.0, SECTION 6.3.2.2, Page 6-23, Lines 16 & 17:** *". . . and pallets (if not previously removed)."*

The pallets referenced in this section are not applicable, as they are not generated waste due to the cleanup activities. Strike the above referenced portion from this section.

7. **CHAPTER 6.0, SECTION 6.3.2.3, Page 6-25, Line 1:**

Place a table or list of the PNL release limits in this section so that they can be compared to the actual limits in the closure certification results.

8. **APPENDIX A SAMPLING AND ANALYSIS PLAN, TABLE A.2, Page A-7:**

A disclaimer needs to be added to this table stating, "The MTCA Level B values listed above (or in Table A.2) are unique to the conditions at the SHLWS Facility and are not indicative of MTCA Level B values to be used at other Hanford Sites."

9. **APPENDIX B - QUALITY ASSURANCE, SECTION B.6, Page B-9:**

Mention in this section that Ecology will be taking two split samples.

10. **APPENDIX B - QUALITY ASSURANCE, SECTION B.6.3, Page B-11:**

Address holding time in this section.