

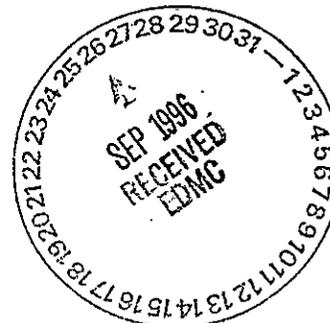


STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

1315 W. 4th Avenue • Kennewick, Washington 99336-6018 • (509) 735-7581

September 23, 1996

Mr. James McClusky, Manager
Waste Storage Division
U.S. Department of Energy
P.O. Box 550
Richland, WA 99352



Dear Mr. McClusky:

Re: C-106 Retrieval Safety Assessment Document (SAD) (Project W-320)

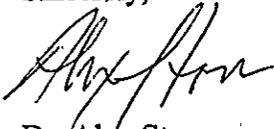
The Washington State Department of Ecology (Ecology) attended a Chemical Reactions Sub-Technical Advisory Panel (CRS) meeting held at Hanford on July 23-25, 1996, during which C-106 retrieval issues were discussed. During the discussion, the U.S. Department of Energy (USDOE) explained that in the event a leak is detected in C-106 during retrieval, the corrective action response procedures dictate the cessation of retrieval activities. In its written report, the CRS indicated, in its professional opinion, that leakage from C-106 should "lead to an increased desire to transfer waste from 106-C."

Ecology concurs with this presumption and requests the SAD describe corrective action response procedures, which would minimize waste leakage from C-106 during retrieval activities. Ecology recognizes the necessity of simultaneously addressing gas retention, and other safety considerations, in relation to the receiving tank (AY-102). Therefore, it is requested the SAD include contingencies for the following safety related cases: 1) gas retention in AY-102, 2) C-106 leakage during retrieval, and 3) gas retention in AY-102 and C-106 leakage during retrieval. For each case, the primary objective should be to minimize leakage to the environment during transfer of waste from C-106.

Mr. James McClusky
September 19, 1996
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Please forward a copy of the revised SAD, incorporating the above described concerns, as soon as possible. If you or your staff have any questions regarding this letter, please contact me at (509) 736-3018.

Sincerely,



Dr. Alex Stone
Safety Project Manager
Nuclear Waste Program

AS:sb

cc: Doug Sherwood, EPA
Bruce Nicoll, USDOE
Dave Pepson, USDOE
Bob Cash, WHC
John Harris, WHC
Ralph Arcuro, DNFSB
Billy Hudson, Chemical Reaction Sub-Technical Advisory Panel
Administrative Record: C-106 Retrieval