



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

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97-EAP-028

Mr. Moses N. Jaraysi  
 200 Area Unit Supervisor  
 Nuclear Waste Program  
 State of Washington  
 Department of Ecology  
 1315 West Fourth Avenue  
 Kennewick, Washington 99336-6018

Mr. Joseph J. Witczak  
 Unit Supervisor  
 Regulatory and Technical Support  
 Nuclear Waste Program  
 State of Washington  
 Department of Ecology  
 P.O. Box 47600  
 Olympia, Washington 98504-7600



Dear Messrs. Jaraysi and Witczak:

REDUCTION OF WEEKLY RESOURCE CONSERVATION AND RECOVERY ACT TREATMENT/  
 STORAGE/DISPOSAL UNIT INSPECTIONS AT THE 105-DR LARGE SODIUM FIRE  
 FACILITY (T-1-1)

The U.S. Department of Energy, Richland Operations Office (RL) and the Fluor Daniel Hanford (FDH) are requesting that weekly Resource Conservation and Recovery Act (RCRA) treatment, storage, and disposal (TSD) unit inspections of the 105-DR Large Sodium Fire Facility, required by Washington Administrative Code 173-303-320, be reduced to semiannual inspections for the following reasons:

1. All dangerous waste has been removed from the unit.
2. All areas of the unit accessible to personnel have been clean closed.
3. The dangerous waste residues remaining in the unit are:
  - a. In areas not accessible to personnel,
  - b. Of relatively low hazard (primarily sodium bicarbonate, state-only dangerous waste (WT02), toxic category 'D'),
  - c. Protected from the effects of the environment and weather by the exhaust system structures, and
  - d. Relatively immobile due to being located inside the exhaust system structures.

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4. Radiation survey results have allowed the areas of the unit accessible to personnel to be removed from a radiological control area.
5. The unit will remain vacant until final closure during the decontamination and decommissioning of the 105-DR Reactor.
6. The unit will remain locked to control access.

Since no dangerous waste remains at the unit, reducing the frequency of RCRA TSD unit inspections would allow resources to be redirected toward higher priority work.

Should you have any questions, please contact Ellen M. Mattlin, RL, on (509) 376-2385, Roger C. Bowman, RFSH, on (509) 376-4876, or Tom A. Dillhoff, BWHC, on (509) 376-0441.

Sincerely,



James E. Rasmussen, Director  
Environmental Assurance, Permits,  
and Policy Division  
DOE Richland Operations Office

EAP:EMM



William D. Adair, Director  
Environmental Protection  
Responsible Party for  
Flour Daniel Hanford, Inc.

cc: EDMC, H6-08  
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