



Department of Energy
Richland Operations Office
P.O. Box 550
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0076171

08-SED-0090

FEB 08 2008

Mr. John P. Martell, Manager
Radioactive Air Emissions Section
State of Washington
Department of Health
Office of Radiation Protection
P. O. Box 47827
Olympia, Washington 98504-7827

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FEB 13 2008
EDMC

Dear Mr. Martell:

RESPONSE TO LETTER AIR 07-1202 – CLARIFICATION OF STACK 296-P-31 LISTING
IN CY 2006 RADIONUCLIDE AIR EMISSIONS REPORT

The purpose of this letter is to respond to letter AIR 07-1202, dated December 14, 2007, from the Washington State Department of Health (WDOH), which states that “emission unit 296-P-31 was misreported as being a minor emission unit” in the *Radionuclide Air Emissions Report (RAER) for the Hanford Site, Calendar Year 2006* (DOE/RL-2007-01, Revision 0). AIR 07-1202 requires submittal of a revision to the RAER to clarify that “296-P-31 falls under the major emission unit category.”

The proposed U.S. Department of Energy, Richland Operations Office (RL) response is to add an erratum to the forthcoming RAER for CY 2007 rather than revise the already-issued RAER for CY 2006. The erratum will state that 296-P-31 was categorized as a major emission unit in the latest DOE Hanford Site Radioactive Air Emission FF-01 License (FF-01). In past years, WDOH has accepted errata in subsequent radionuclide air emission reports as a suitable means for documenting corrections and/or clarifications to reports already published. RL plans on using this path forward to satisfy the AIR 07-1202 requirement unless notified otherwise. Also be aware that the erratum to be published in June 2008 will be the actual revision.

We appreciate WDOH’s continuing mutual effort to clarify the regulatory basis for the appropriate monitoring category and alternative monitoring method for 296-P-31. Recapping past correspondence, RL requested on October 2, 2007, that WDOH approve alternative effluent flow-rate measurement procedures as well as site selection and sample extraction procedures. On December 13, 2007, WDOH approved that request, authorizing RL to manage the measurement and reporting of 296-P-31 emissions in accordance with subsequent conditions and limitations. This approval has no retroactive bearing on monitoring performed and emission unit parameters reported in 2006. Of further note is that listing emission units as major or minor in the RAER is not required by federal or state regulation. We look forward to discussing with you and your staff the latest draft of the FF-01 entry that will reflect the newly approved alternative monitoring for 296-P-31.

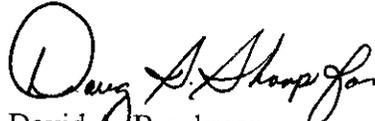
Mr. John P. Martell
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If you have any questions, please contact me, or your staff may contact Rob G. Hastings, Acting Assistant Manager for Safety and Engineering, at (509) 376-9824

Sincerely,


David A. Brockman
Manager

SED:TWF

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