



## Department of Energy

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Richland Operations Office  
P.O. Box 550  
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FEB 05 1991

91-PPB-355

Mr. Timothy L. Nord  
Hanford Project Manager  
State of Washington  
Department of Ecology  
99 South Sound  
Lacey, Washington 98503

Dear Mr. Nord:

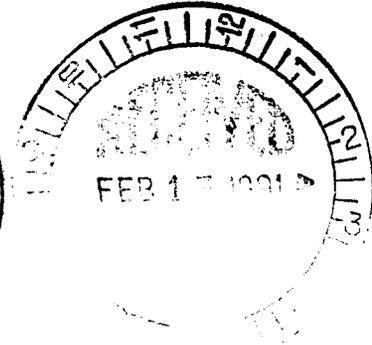
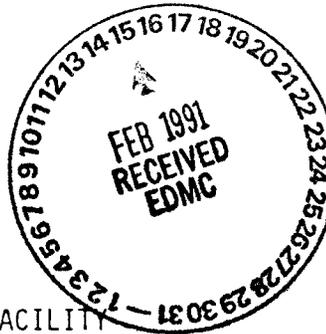
### WASTE ACCUMULATION AT THE 241-Z FACILITY

On December 21, 1990, Mr. Toby Michelena of your staff was notified of impending problems with making a transfer of radioactive mixed waste from the 241-Z Facility at the Plutonium Finishing Plant (PFP) prior to the 90-day limit (December 25, 1990). At this time, plant personnel believed that the waste may be nonhazardous since the plant had not been operating during the period of waste accumulation. Analytical results were expected that afternoon of December 21, 1990, to designate the waste.

A raw water line at Tank 244-TX, where the wastes from 214-Z are transferred, had frozen due to the cold weather, however subsequently ruptured on December 20, 1990. If the wastes in 241-Z were determined to be hazardous, a transfer could not be accomplished until repair of the raw water line was completed, which might be after the December 25, 1990, limit. Mr. Michelena indicated that the Washington State Department of Ecology would not pursue formal action if the 90-day clock was exceeded and asked Hanford to formally transmit a letter describing the problems with the wastes transfer. This letter fulfills that commitment.

Upon receipt of the analytical results on December 21, 1990, the wastes were determined to be hazardous. Repair of the 244-TX Raw Water Line was completed, and preparations were made for the wastes transfer. The PFP personnel attempted to sample the waste in 241-Z a second time on December 22, 1990, to verify that tank farm acceptance criteria were met, and determined that the sample line had frozen. After the line was thawed, sampling was again attempted, but low pressure in the line caused personnel to suspect a leak. Troubleshooting and repair of the sampling system have been completed.

A second rupture of the 244-TX Raw Water Line occurred on December 23, 1990. The line was again repaired and placed back into service. However, as a result of these two leaks, the raw water flowed into the 244-TX Service Pit and into the tank. The volume of raw water from the two leaks filled Tank 244-TX to within one inch of the operating limit, leaving no available volume for a transfer from 241-Z.



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Wastes from Tank 244-TX are normally transferred to Tank 102-SY, a double-shell tank. However, the waste transfer lines are routed through Diversion Box 151-S. Secondary containment for 151-S is provided by Catch Tank S-302-A. As you are aware, a leak was confirmed in Tank S-302-A in June 1990. We are in the process of repairing this tank, and expect to have repairs completed by March 15, 1991. Once these repairs are completed, the wastes in Tank 244-TX will be transferred to Tank 102-SY. When space is available in Tank 244-TX, the wastes from 241-Z will be transferred. Based upon the current schedule for the S-302-A repair, we expect to be able to remove the wastes from 241-Z by April 15, 1991.

Please provide your written approval of our plans and schedule for correcting this problem. If you have any questions, please contact Mr. Bob Holt, of my staff on (509) 376-7471.

Sincerely,



R. D. Izatt, Director  
Environmental Restoration Division

ERD:RGH

cc: T. M. Michelena, Ecology  
~~R. E. Lerch, WHC~~  
E. C. Vogt, WHC

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Incoming 9100729

Subject: WASTE ACCUMULATION AT THE 241-Z FACILITY

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