



Department of Energy

Richland Operations Office
 P.O. Box 550
 Richland, Washington 99352

APR 24 1992

92-ERB-041

Mr. Paul T. Day
 Hanford Project Manager
 U.S. Environmental Protection Agency
 712 Swift Boulevard, Suite 5
 Richland, Washington 99352

Mr. David B. Jansen, P.E.
 Hanford Project Manager
 State of Washington
 Department of Ecology
 P.O. Box 47600
 Olympia, Washington 98504-7600

Dear Messrs. Day and Jansen:

HANFORD FEDERAL FACILITY AGREEMENT AND CONSENT ORDER (TRI-PARTY AGREEMENT)
 CHANGE CONTROL FORM M-15-92-1, EXTENSION OF 200-BP-1 MILESTONES

- Reference: (1) DOE ltr, to P. T. Day, EPA, and D. B. Jansen, Ecology, from S. H. Wisness, "Creation of Danger, Hanford Federal Facility Agreement and Consent Order," 92-TPA-022, dtd February 14, 1992. *19142*
- (2) DOE ltr, to Contractors, Richland, Washington, from J. D. Wagoner, "Immediate Precautionary Safety Actions - Tank Farms," dtd January 28, 1992.
- (3) WHC ltr, to J. D. Wagoner, from T. M. Anderson, "Respiratory Protection Requirements for Single-Shell Tank Farms," dtd February 12, 1992.
- (4) DOE ltr, to Contractors, Richland, Washington, from J. D. Wagoner, "Precautionary Safety Actions - Tanks Farms Fumes," dtd February 14, 1992.

On January 28, 1992, a serious safety concern arose on the Hanford Site when two workers were taken to the hospital after they became ill following what apparently was exposure to unidentified chemical fumes in the 200 East Area. Work restrictions were immediately imposed around all single-shell tank (SST) farms. Barricades were used to create a restricted access safety zone at least 500-yards around each of the SST groups in the 200 East and 200 West Areas. Outdoor work within these zones required advance approval of facility management and occupational health and safety supervision. In addition, anyone working within a 250-yard zone was required to use supplied air.

There was a work stoppage of all 200-BP-1 Remedial Investigation (RI) activities within the Operable Unit (OU) from January 28, 1992 - February 24, 1992. These actions are documented in References 2, 3, and 4, which are attached for your convenience. This work stoppage has resulted in a four-week delay in submittal of the RI Phase 1 report, Tri-Party Agreement milestone M-15-02-T1, and submittal of the Feasibility Study (FS) Phase 1 and Phase 2 report, Tri-Party Agreement milestone M-15-02A. Submittal of Phase 1 RI

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report (M-15-02-T1) will be delayed one-month to March 31, 1993. Submittal of Phase 1 and 2 FS report (M-15-02A) will be delayed one-month to June 30, 1993. The DOE/RL-88-32, Rev. 1, RI/FS Work Plan for the 200-BP-1 OU, Hanford Site, Richland, Washington and the Tri-Party Agreement Action Plan, Appendix D, Work Schedule documents will be impacted.

In summary, these restrictions have imposed limitations on our ability towards meeting the Tri-Party Agreement milestones cited above. Under the Common Provisions of the Tri-Party Agreement, Article XXXI, "Creation of Danger" if any party determines that activities conducted pursuant to the agreement are creating a danger to the health or welfare of the people on the Hanford Site, that Party may require or order the work to stop.

The Agreement further stipulates that any such work stoppage or stop work order shall be expeditiously reviewed by all parties after its initiation. Tri-Party Agreement Paragraph 96 states:

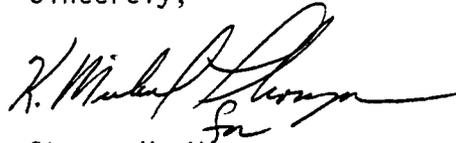
"If the other Parties concur in the work stoppage, DOE's obligations shall be suspended and the time periods for performance of that work, as well as the time period for any other work dependent upon the work which was stopped, shall be extended, pursuant to Article XL, (Extensions) of the Agreement, for such period of time equivalent to the time in which work was stopped, or as agreed to by the Parties."

The U.S. Department of Energy, Richland Field Office desires to invoke the "Creation of Danger" clause of the Tri-Party Agreement for the activities associated with the milestones and commitments at the 200-BP-1 OU.

Attached for your approval is the subject Class II Change Control Form. This Change Control Form was prepared in response to the fumes incident in the 200 East Area (see reference letter). The change is required per Tri-Party Agreement Article XXXI, "Creation of Danger." The affected milestones are M-15-02-T1 and M-15-02A. A one-month extension is being requested.

If you have any questions, please contact me on (509) 376-6798 or Mr. Allan Harris on (509) 376-4339.

Sincerely,

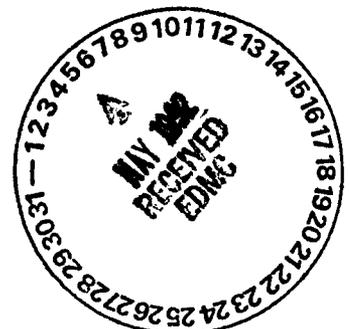


Steven H. Wisness
Hanford Project Manager

ERD:ACH

Attachments: As stated

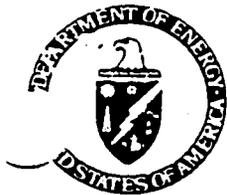
cc w/atts:
R. E. Lerch, WHC
T. B. Veneziano, WHC



ATTACHMENT

HANFORD FEDERAL FACILITY AGREEMENT AND
CONSENT ORDER

CHANGE CONTROL FORM
M-15-92-1



Department of Energy

Richland Operations Office
P.O. Box 550
Richland, Washington 99352

JAN 28 1992

Contractors, Richland, Washington

Dr. W. L. Meader, President
Hanford Environmental Health Foundation

Mr. R. T. French, General Manager
Kaiser Engineers Hanford Company

Dr. W. R. Wiley, Director
Pacific Northwest Laboratory

Mr. T. M. Anderson, President
Westinghouse Hanford Company

Dear Gentlemen:

IMMEDIATE PRECAUTIONARY SAFETY ACTIONS - TANK FARMS

Safety is our highest priority, as you all know. This letter formalizes the immediate precautionary safety actions that were developed and initiated during my meeting with you today following the report of several workers being exposed to unknown fumes while working near a tank farm. Two of the workers required hospital treatment. Similar events of this type have occurred in the past and were the subject of a Type "B" investigation I was initiating. It is believed these fumes may be from periodic releases from single-shell tanks (SSTs). The significance of these fumes to our work force and the fact that we do not understand much about how or when these releases can occur warrants exceptional action. The following actions are to remain in effect until appropriate corrective actions have been developed and approved by the Department of Energy, Richland Field Office (RL).

1. All work in the fenced boundaries of the SST farms is to be suspended except vital safety actions and these are to be allowed only with appropriate safety equipment and precautions.
2. All work and work stations within 250 yards of the SST farms are to be suspended or evacuated, respectively, except vital safety activities, and these are to be allowed only with appropriate safety equipment and precautions. The Westinghouse Hanford Company (WHC) is to identify the work considered to be vital to safety, and notify RL.
3. Access through the area above is to be restricted to that absolutely necessary for safety and only with appropriate safety equipment and precautions.

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4. Tank toxic vapor releases were previously identified as one of 26 potential safety issues in DOE's July 1991 report to Congress. However, it was previously assigned a priority 2. This is now upgraded to a priority 1. WHC is requested to develop the appropriate program plan including costs and schedules which reflect the higher priority assigned to this issue. Please advise on the timeframe that this can be submitted to RL.
5. The tank vapor issue is to be evaluated by WHC to determine if it represents an unreviewed safety question per established criteria and notify RL as soon as possible.
6. RL will evaluate the need to expand or upgrade the planned Type "B" investigation as mentioned previously.
7. All Hanford contractors are to provide any and all support requested by RL or WHC. If you have ideas, equipment, capability, etc., that should be brought to WHC or RL attention, please do so.
8. All contractors should take the initiative to inform and involve affected workers by taking steps to assure that assignments of workers to tasks within tank farm areas potentially affected by fumes are thoroughly informed of this issue.
9. I request that we have a daily briefing at 5:00 p.m. to discuss status and other actions that may be appropriate. This will continue until further notice, and that daily status reports be prepared for distribution.

I very much appreciate your immediately working with me to develop and implement those actions to ensure that all that can be, is done to protect our work force and resolve this long standing safety issue.

If you have any questions, please contact me or your staff may contact Mr. Ronald E. Gerton, Project Manager, Tank Farm Project Office on 376-9106.

Sincerely,



for John D. Wagoner
Manager

TFPO:GJB

cc: L. P. Duffy, EM-1/HQ
S. M. Blush, NS-1/HQ
P. L. Zeimer, EH-1/HQ



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Richland Operations Office
P.O. Box 550
Richland, Washington 99352

Contractors, Richland, Washington

FEB 14 1992

Dr. W. L. Meader, President
Hanford Environmental Health Foundation

Mr. R. T. French, General Manager
Kaiser Engineers Hanford Company

Dr. W. R. Wiley, Director
Pacific Northwest Laboratory

Mr. T. M. Anderson, President
Westinghouse Hanford Company (WHC)

Dear Gentlemen:

PRECAUTIONARY SAFETY ACTIONS - TANK FARMS FUMES

This amends items 1. and 2. of my letter to you dated January 28, 1992, that requested a 250 yard zone around SST farms, within which work generally would be suspended and work stations evacuated.

Your teamwork and cooperation in addressing this issue has helped achieve timely resolution to the benefit of all contractor employees who work in and around the Hanford tank farms. Thank you for your prompt, personal, attention to this matter.

The WHC February 12, 1992 reply summarized data, calculations, evaluations, and rationale that were discussed during our daily 5:00 p.m. briefings, and which have been subject to review by DOE-RL. The information showed that the restricted zones could be reduced, with resulting improvements in the ability of personnel to perform operational and maintenance tasks important to safety and the environment.

For 241-BX, -BY, and -C tank farms, the proposed exclusion area is acceptable, and may be reduced at local points to facilitate performance of short duration work for operation, surveillance, and maintenance of equipment. Such reductions may be made in recognition of the long-term aspect of the health-based thresholds considered in your bases, and implementation should include appropriate workspace monitoring, and control of access durations. WHC may proceed with implementation of these actions following verification that these actions are adequate for hydrogen cyanide gas.

WHC, with the support of the other Hanford contractors, should work toward establishing a basis for further reductions in the exclusion zones, to permit performance of operational, surveillance, maintenance, and characterization activities without burden to workers of forced air respiratory protection. This should include developing monitoring and characterization information, and improving equipment/facility configuration and administrative elements. WHC should expedite efforts to obtain and install the continuous monitors.

Contractors

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The industrial health aspects of tank vapors should be integrated into the overall planning for addressing characterization of individual waste tanks.

If you have any questions, please contact me or your staff may contact Mr. Ronald E. Gerton, Project Manager, Tank Farm Project Office on 376-9106.

Sincerely,


John D. Wagoner
Manager

TFPO:GJB

cc: L. P. Duffy, EM-1/HQ
S. M. Blush, NS-1/HQ
P. L. Zeimer, EH-1/HQ

for

CORRESPONDENCE DISTRIBUTION COVERSHEET

Author	Addressee	Correspondence No.
S. H. Wisness, RL	P. T. Day, EPA D. B. Jansen, Ecology	Incoming 9203103 Xref 9251574D

Subject: HANFORD FEDERAL FACILITY AGREEMENT AND CONSENT ORDER CHANGE CONTROL FORM M-15-92-1, EXTENSION OF 200-BP-1 MILESTONES

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ldp, 6-7049