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Department of Energy

Richland Operations Office
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Richland, Washington 99352

JAN 02 1996

Mr. Steve M. Alexander
Nuclear Waste Program
State of Washington
Department of Ecology
1313 W. 4th Avenue
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Dear Mr. Alexander:

DANGEROUS WASTE COMPLIANCE INSPECTION AT 183-H SOLAR EVAPORATION BASINS - CORRECTIVE MEASURE

This letter responds to the letter dated December 5, 1995, from the State of Washington Department of Ecology (Ecology) to the U.S. Department of Energy, Richland Operations Office (RL) and Bechtel Hanford, Inc. (BHI) regarding the 183-H Basins at the Hanford Facility. The Ecology letter stated that an inspection of the 183-H Basins and investigation of the pressurization of drum #100H-95-0015 had revealed certain deficiencies. Specifically, the training plan in use during closure operations was not the training plan specified in Appendix N of the 183-H Closure/Post Closure Plan, and recordkeeping of waste generated from the 183-H Basins was incomplete and inaccurate. As a corrective measure, Ecology requested RL and BHI to certify that all requirements described in the 183-H Closure/Post Closure Plan are being met. Completion of this corrective measure was requested by January 4, 1996.

In a December 7, 1995, meeting between the RL, BHI, and Ecology, it was agreed that the response necessary to fulfill the corrective measure request would include an explanation of the compliance status for certain portions of the Closure Plan, including the Personnel Training section. By this letter, RL and BHI certify that applicable requirements of the 183-H Closure/Post Closure Plan are being met, subject to the following compliance status explanation.

Closure Plan Compliance Status

As discussed in the December 7, 1995, meeting, the Closure/Post Closure Plan for the 183-H unit was written prior to 1991. Since that time, most of the activities necessary for closure of the facility have been completed. These activities have been conducted in substantial compliance with the Closure Plan, as discussed and interpreted at regular monthly meetings with Ecology. Primarily, differences between activities and the Closure Plan are in respect to the training plan in Appendix N, the Post Closure Requirements in Section III, and a waste designation statement on page I-107.

The training plan implemented in 1995 is essentially comparable to the 1991 training plan in Appendix N of the Closure Plan. A copy of the current training plan has been provided to your office and more copies are available upon request. The differences between the plans relate to format (from transfer of duties from one contractor to another), and clarification of how certain elements should be applied to current activities. The current training plan and project work package provided the substance of all ten

Mr. Steve M. Alexander

-2-

JAN 02 1996

training elements specified in the Appendix N training plan except cardiopulmonary resuscitation (CPR) training. The current training plan requirements for general and site specific hazards training for all employees are comparable to those elements in the Appendix N. Although the Appendix N training plan required hazardous waste worker initial and refresher safety training for all employees, the 1995 training plan requires such training only for employees entering the treatment, storage, and disposal unit. Self-contained breathing apparatus (SCBA) and Scott SKAPAK training are included in Hanford hazardous worker safety training. The Appendix N Plan required CPR for all employees. Although CPR is a valuable skill, CPR training for every worker was not necessary to accomplish the 1995 closure tasks. The site's craft supervisor (and other personnel as identified in the site Health and Safety Plan) are current on CPR training. Radiation safety training requirements are detailed in the Radiation Work Permit required as part of the project work package. The work package also requires job specific training. As discussed below, although the 183-H work package required job specific waste handling training, the training that was provided prior to October 1995 was not adequate to assure proper waste management. Corrective action has been taken to improve waste handling training to assure waste will be managed in compliance with applicable requirements.

The closure option specified in Section III of the Closure Plan provides for a landfill closure rather than a modified closure. The existing Section III was written prior to the availability of and decision to use the modified closure option. In addition, Section III groundwater monitoring information provides for an interim status monitoring program, rather than a final status program. RL and Mr. Joe Witczak of Ecology previously determined that the existing provisions in Section III of the Closure Plan are currently adequate, and that modification of these provisions should occur when the Post Closure permit for 183-H is issued in Modification C (anticipated effective date of July 1, 1997) of the Resource Conservation and Recovery Act Permit. In the Post Closure Permit application, RL will request approval of certain provisions of Section III as a substitute for Permit condition V.I.B.u. post closure permit conditions, and will request concurrence that Section III.A-1, III.B, and III.C. will not be applicable upon certification of closure activities if the dangerous waste constituents in the soil are below Model Toxic Control Act Method B cleanup levels.

Page I-107 of the Closure Plan states that all sludges, rinsates, and abrasive materials generated during decontamination and sampling will be handled and disposed of as dangerous waste. Subsequently, these materials have been determined not to be dangerous waste.

### Corrective Actions

RL and BHI recognize that inadequate waste handling contributed to the drum pressurization incident and have implemented a number of corrective actions to improve waste handling and recordkeeping. In correspondence dated September 25, 1995, Westinghouse Hanford Company (WHC), Solid Waste Disposal identified that certain wastes from 183-H did not meet the Hanford Central Waste Complex waste acceptance criteria. A Corrective Action Plan was

Mr. Steve M. Alexander

-3-

JAN 02 1996

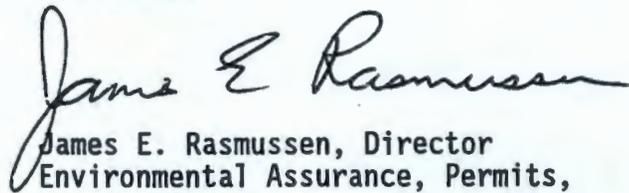
submitted to WHC by BHI on September 26, 1995, and was acted upon by that same date. A copy of the Corrective Action Plan is available upon request. WHC reviewed the BHI Corrective Action Plan and concurred with the actions taken to resolve the identified issues, correct the recordkeeping deficiencies, and assure that applicable waste acceptance criteria are met in the future. Training requirements have been reviewed to ensure that personnel who package waste receive adequate training relative to waste handling. Waste stream specific training is identified in BHI project work packages. The BHI work packages that involve waste packaging have been reviewed to ensure completeness and compliance.

#### Modification to Permit

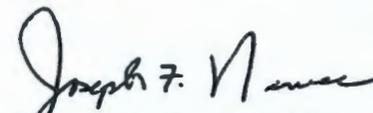
The Permit states that all Class 1 modifications to the Permit will be submitted on a quarterly basis (Condition I.C.3.). The technical differences in current activities from the existing 183-H Closure Plan training plan and waste designation determination, as described in this letter, may be appropriate for a Class I modification. RL is prepared to submit a request for a Class 1 modification to the Permit for the first quarter of calendar year 1996 (submittal date of April 10, 1996). Alternatively, should Ecology determine that the changes do not constitute a Class 1 modification, written authorization to continue the current status of operations is requested until closure modification can be accomplished.

Should you have further questions regarding the information provided, please call Mr. Jeffrey Bruggeman on 376-7121. Thank you for your cooperation in this matter.

Sincerely,



James E. Rasmussen, Director  
Environmental Assurance, Permits,  
and Policy



J. F. Nemecek, President  
Bechtel Hanford, Inc.

cc: J. Badden, BHI  
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