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Nuclear Waste Program
Hanford Project
Dangerous Waste Compliance Inspection
224-T, TRUSAF
Compliance Follow Up Inspection

1. Introductory Information:

Name & Address of Owner:
U.S. Department of Energy
Richland Operations Office
P.O. Box 550
Richland, WA 99352

ID Number: WA7890008967

Operator:
Westinghouse Hanford Company
P.O. Box 1970
Richland, WA 99352

Date & Time of Inspection(s):
September 1, 1994 1300-1600 hours

Phone Number & Contact:
Jeff Pratt, Manager; TRUSAF
(509) 373-1181

Date of Inspection Report:
October 18, 1994

Type and Reason for Inspection:

The Washington State Department of Ecology (Ecology) performed an inspection of TRUSAF on November 18, 1993, which resulted in a December 13, 1993, voluntary compliance letter directing four corrective actions be completed by March 14, 1994. This report documents the follow up inspection to determine completion of the corrective actions identified in the compliance letter, and to observe the current operating conditions at TRUSAF.

Report Prepared by: Robert Wilson

Inspection Conducted by: Robert Wilson
Alisa Huckaby

This inspection was conducted by the following representatives from the Washington State Department of Ecology, Nuclear Waste Program, Kennewick Office:

Robert Wilson, RCRA Compliance Inspector

Alisa Huckaby, TRUSAF Unit Manager

Personnel contacted during this inspection include:

Jeff Pratt, WHC Mgr, TRUSAF
Tom Davies, USDOE Facility Rep.
Mike Aichele, WHC Mgr, Solid Waste Ops
Sarah Campbell, WHC Solid Waste ECO
Jerry Todd, TRUSAF Operator
Steve Szendre, WHC Field Services
Chris Ceijka, WHC Cog Engineer, TRUSAF
R. Holcombe, WHC, HPT
Melonie Bedick, WHC, Field Services
Greg Struwe, TRUSAF Operator

2. Background:

TRUSAF stores transuranic wastes, which sometimes may designate as mixed waste. Though many of the wastes are destined for the Waste Isolation Pilot Project (WIPP) in New Mexico, the drums may be stored for periods of years within the TRUSAF building. At the time of the November 18, 1993, inspection, the container storage system at TRUSAF was complicated due to a number of containers that had not been fully characterized as to their dangerous waste components, and in some cases, their proper inventory status not confirmed by real time radiography (RTR), which is a routine acceptance procedure at TRUSAF. Therefore, no determination was made regarding regulatory requirements for containers stored in TRUSAF to go through a designation process according to the Washington Administration Code (WAC). Most of these containers had been stored in this unresolved status for many years, typically since the early 1980's. The drums could not be returned to the generators, since they were radiologically contaminated as well.

The corrective actions identified in the December 13, 1993, voluntary compliance letter issued as a result of the November 18, 1993, inspection were:

i) ". . . acquire and maintain emergency equipment required by WAC 173-303-350(3)(e) in accordance with the TRUSAF facility emergency/contingency plan (WHC-IP-0263-224T)." per the contingency plan.
ii) ". . . begin maintaining the operating record in a manner sufficient to locate wastes within the facility per WAC 173-303-380(1)(b)."
iii) ". . . determine the dangerous waste status of all containers stored at TRUSAF."
iv) ". . . store all dangerous waste containers containing free liquids within a compliant secondary containment system per WAC 173-303-630(7)."

3. Description of Inspection:

Alisa Huckaby, TRUSAF Unit Manager, Ecology, and I arrived at the Westinghouse Radiological Access Management (WRAM) station, MO-721, in the 200 West Area at 1:00 p.m., accompanied by Steve Szendre and Melonie Bedick, WHC Field Services. The radiological work permit for touring TRUSAF no longer required wearing auxiliary dosimetry beyond the chips contained within the Hanford badges, however, Alisa Huckaby requested and received a "pencil" type dosimeter to wear during the tour, in addition to the regularly worn badges. After processing through the WRAM station, we drove to the TRUSAF building adjacent T-Plant in the 200 West Area.

We met the rest of the participants of the inspection in the new modular office building, MO-289, immediately west of TRUSAF and within the TRUSAF fence line. I gave an overview of the inspection and said the goal of the inspection was to assess satisfactory completion of the four corrective actions and to observe the general operating conditions at TRUSAF. I circulated an outline of the inspection plan (see attachments).

Jeff Pratt, Manager of TRUSAF, suggested we observe the container tracking system used to satisfy the corrective action requiring TRUSAF be able to locate wastes within the facility. A computer station within the office was used to access the Solid Waste Information Tracking System (SWITS). Containers could be located by package identification numbers (PIN) in SWITS. I requested that container numbers RHZ-102-A14967, RHZ-102-A15110, and RH-A-87-067, be looked up in SWITS (these were containers with labelling problems from the November 18, 1993, inspection). A screen appeared that gave a coordinate and floor number with which to locate the containers.

> NOTE: These containers were later located in TRUSAF during the inspection by the coordinates given in SWITS and corresponded to labels on the floor in the facility.

The containers that contained mixed waste appeared in SWITS as "OMW," - Other Mixed Waste.

I asked if SWITS listed the waste codes associated with the containers, or if it only listed the containers as OMW. J. Pratt said the SWITS screen used at TRUSAF would only list mixed waste as OMW. Particular waste codes associated with the containers would have to be looked up in the files for the wastes. We looked up the files for the three containers above and found the associated waste codes.

J. Pratt suggested we run a container currently being received at TRUSAF through SWITS. He said a number of containers were located in the receiving area and that SWITS should locate them there. An operator went into the receiving area and returned with a number of container PIN numbers. I selected number PFP-94-000463. SWITS located the container in the receiving area of TRUSAF.

I asked how a spill would be retrieved from under the elevator, from the elevator sump, or basement. J. Pratt said he did not have any knowledge of that scenario being a problem and that a leak had never occurred that threatened that area. I said there appeared to be no contingency plan for that possibility. J. Pratt said liquids would probably be pumped out from under the elevator if they were to leak into the area.

I asked if the floor sealing project had been completed that satisfied secondary containment problems. J. Pratt said it had been completed.

I requested manufacturers information on the sealant that would indicate its chemical resistance. J. Pratt said he would see that I received the information.

The group proceeded into the TRUSAF building. We went directly to the second floor to observe the floor coating which was reported to satisfy secondary containment requirements and

observe the numbering system on the floor which corresponded to the SWITS coordinates for container locating purposes. The floor appeared well coated and exhibited no cracks or gaps. The selected containers located in the office through SWITS were easily located with the coordinate and floor numbering system.

While inspecting the storage arrays, a number of drums were observed with "caustic" labels, yet without waste codes written in on the "hazardous waste" stickers. Two 85-gallon overpacked drums, numbers RHZ-212-A17937 and RHZ-213-18394, were observed without hazardous waste labels. I asked J. Pratt about them and he said they were two drums that had been in storage at TRUSAF since 1987 and they had begun to leak. They were overpacked, but labels had not been applied. Hazardous waste labels were applied as we discussed the drums.

I then requested that drum number RHZ-212-A19448 be located by SWITS (this drum was found during the November 18, 1993, inspection with a "return to generator" label on it signed by Mike Aichele. Also, a label on the drum indicated the drum contained nitric acid crystals, but had not been designated). The drum was successfully located by SWITS and the floor numbering system. It was labelled as hazardous waste and had a DOT caustic sticker. M. Aichele said since the drum could not be sampled due to radiological contamination, it had been "conservatively" designated D002, because it was known to contain some level of nitric acid.

While on the second floor, A. Huckaby asked J. Pratt about the status of an array of drums located on the southern end of the floor. J. Pratt explained the drums were, "the closest thing we'll get to WIPP certified waste."

A "traveler" (documentation packet regarding contents and manifesting of waste), accompanied each drum of transuranic waste. A. Huckaby reviewed a number of travelers and noted discrepancies in the listed inventory of the drums and the RTR evaluation of the drums. Though not a dangerous waste issue, this situation still potentially impacts the operational status of TRUSAF. Although the RTR process in TRUSAF is designed to confirm drum contents, A. Huckaby noted two issues involving RTR verification of waste received and stored at TRUSAF.

One issue involved a lack of signatures by TRUSAF management responsible for assuring that inventory discrepancies of transuranic wastes had been resolved or verified.

A second issue involved RTR results from drums examined at TRUSAF years ago that had revealed waste content discrepancies which were unresolved. TRUSAF management indicated resolution of these inventory discrepancies may not take place for a number of years, thereby subjecting the drums to long term storage at TRUSAF without waste content verification.

A. Huckaby said that this would be considered during the ongoing permitting process of TRUSAF.

The group went to the third floor where similar floor sealing and numbering had been completed. The containers appeared well organized and the floor in good shape. The group descended to the first floor where we observed the spill kit, which was found deficient during the November 18, 1993, inspection, adjacent the elevator. I requested that the kit be opened. The kit was opened

and the contents checked against an inventory list within the kit. All components were in place. Fire extinguishers within TRUSAF were also found charged and ready for service.

We proceeded to the office area within TRUSAF on the first floor, where I requested the contingency plan. The contingency plan was an older version which was being updated. I said I would be following up on contingency plan issues after the new plan had been issued in October 1994.

The group viewed the receiving room, which was full of drums to the point of not being able to receive any more.

J. Pratt explained that the assay machine in TRUSAF was undergoing an upgrading, and a backlog of drums had resulted from its being out of service.

I observed an array of approximately ten mixed waste drums in the receiving area. The drums had adequate aisle space. Other drums that were designated by the generator as being strictly transuranic wastes were stored five or six drums deep, and the receiving area was full.

The group exited TRUSAF and returned to the office building, MO-289. There I held a close-out briefing of the inspection and said the corrective actions appear to have been completed and I would issue a letter to that effect. I said the two overpacked drums without hazardous waste markings indicated that drum labeling efforts should receive some attention.

4. Summary of Violations and Concerns:

Corrective actions were satisfactorily resolved. The operating condition of TRUSAF had greatly improved since the November 18, 1993, inspection.

A minor concern was the lack of hazardous waste stickers or labelling on the two overpacked drums, #s RHZ-212-A17937 and RHZ-213-18394. Stickers were applied during the inspection, but this instance generated a concern that labelling should receive a little more attention.

5. Attachments:

1) Inspection Plan, TRUSAF Follow Up Inspection
2) SWITS printouts for container numbers: RHZ-212-A19448; RH-A-87-067; RHZ-102-A15110, and RHZ-102-A14967