



1251165

[0063803H]

OFFICE OF RIVER PROTECTION

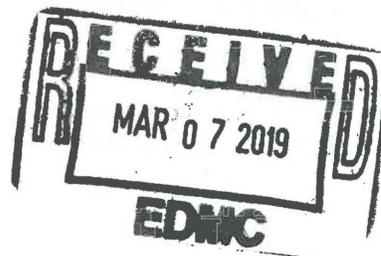
P.O. Box 450, MSIN H6-60
Richland, Washington 99352

AUG 15 2018

18-ECD-0055

Ms. Alexandra K. Smith, Program Manager
Nuclear Waste Program
Washington State
Department of Ecology
3100 Port of Benton Blvd.
Richland, Washington 99354

Mr. Dave Einan, Manager
Office of Environmental Cleanup
Site Cleanup Unit 4
U.S. Environmental Protection Agency
825 Jadwin Avenue, Suite 210
Richland, Washington 99352



Addressees:

**REQUEST FOR WAIVER TO HANFORD FEDERAL FACILITY AGREEMENT AND
CONSENT ORDER WASTE RETRIEVAL CRITERIA FOR SINGLE-SHELL TANK
241-C-106**

References: See page 3

This letter is a follow up to U.S. Department of Energy (DOE) letters 04-TPD-059, issued June 2004, and 04-TPD-094, issued October 2004, requesting waiver of the Hanford Federal Facility Agreement and Consent Order (HFFACO) Appendix H waste residual criteria for Tank 241-C-106.

As required by Appendix H, Step 9, DOE has consulted with the Nuclear Regulatory Commission (NRC) regarding completion of Tank C-106 (04-TPD-095). The NRC has agreed to close its review of the Tank 241-C-106 exception request, and review the post-retrieval waste volumes from all tanks at Waste Management Area C (WMA-C) as part of its formal consultative review of the Hanford WMA-C waste determination evaluation, WMA-C Performance Assessment, and final risk decision for WMA-C closure (Agency-wide Documents Access and Management System Accession NO. ML18074A207).

In 1999 and 2003, DOE conducted waste retrieval campaigns for Tank 241-C-106. Following the use of three retrieval technologies, the final residual waste was estimated to be 370 cubic feet. The waste residual criteria for this tank provided in HFFACO Milestone M-045-00 is 360 cubic feet or the limit of technology whichever is less. The final residual waste volume did not meet the Appendix H criteria despite the use of these three retrieval technologies and DOE is requesting a waiver to the volume limit.

5-2-4
M-045-82, M-045-05L, WMA-C

Addressees
18-ECD-0055

-2-

AUG 15 2018

DOE has previously provided U.S. Environmental Protection Agency and Washington State Department of Ecology with documentation supporting the exception request, (letters 04-TPD-025, 04-TPD-030, 04-TPD-059, and 08-TPD-019). Upon acceptance of the waiver, DOE would proceed with closure operations within WMA-C as outlined in the required Closure Plans, submitted under HFFACO Milestone M-045-82.

With closure of the NRC consultation, DOE respectfully requests reconsideration of its Petition for Regulatory Waiver of the Appendix H residual criteria from U.S. Environmental Protection Agency and Washington State Department of Ecology as outlined in HFFACO Appendix H, Step 9.

If you have any questions, please contact Glyn D. Trenchard, Assistant Manager, Tank Farms Project, (509) 373-4016.

ECD:CJK

cc: J.J. Lyon, Ecology
C.L. Whalen, Ecology



Brian T. Vance
Manager

Addressees
18-ECD-0055

-3-

AUG 1 5 2018

- References:
1. ORP letter from R.J. Schepens to M.A. Wilson, Ecology, "Completion of Hanford Federal Facility Agreement and Consent Order (HFFACO) Target Date M-45-05L-T01 and Partial Completion of Target Date M-45-05M-T01," 04-TPD-025, dated February 27, 2004. *AR-00044/0000044*
 2. ORP letter from R.J. Schepens to M.A. Wilson, Ecology, "Completion of Tank 241-C-106 Waste Retrieval," 04-TPD-030, dated March 11, 2004. *AR-00043*
 3. ORP letter from R.J. Schepens to M.A. Wilson, Ecology, Request for Exception to the Hanford Federal Facility Agreement and Consent Order (HFFACO) Waste Retrieval Criteria, Retrieval Data Reports for Single-Shell Tank (SST) 241-C-106, HFFACO Milestones M-45-00 and M-45-05H, and Target Dates M-45-05L-T01 and M-45-05M-T01," 04-TPD-059, dated June 3, 2004. *DS652917*
 4. ORP letter from R.J. Schepens to N. Ceto, EPA, "Request for Exception to Hanford Federal Facility Agreement and Consent Order (HFFACO) Waste Retrieval Criteria, Retrieval Data Reports for Single-Shell Tank (SST) 241-C-106," 04-TPD-094, dated October 6, 2004. *AR-00042*
 5. ORP letter from R.J. Schepens to A.H. Bradford, NRC, "Request for Nuclear Regulatory Commission (NRC) Review of Basis for Exception to the Hanford Federal Facility Agreement and Consent Order Retrieval Criteria for Single-Shell Tank (SST) 241-C-106," 04-TPD-095, dated October 6, 2004.
 6. ORP letter from S.J. Olinger to J.A. Hedges, Ecology, and N. Ceto, EPA, "Update to the Basis for Exception to the Hanford Federal Facility Agreement and Consent Order (HFFACO) Retrieval Criteria for Single-Shell Tank (SST) 241-C-106," 08-TPD-019, dated April 18, 2008. *AR-00045*
 7. NRC letter from J. Tappert to B.T. Vance, ORP, "U.S. Nuclear Regulatory Commission Staff Response to the U.S. Department of Energy's Request to Close the U.S. Nuclear Regulatory Commission's Review of the Tank 241-C-106 Exception Request Under Appendix H of the Hanford Federal Facility Agreement and Consent Order," dated April 23, 2018.