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May 18, 2017

AIR 17-502

CERTIFIED MAIL

7015 0640 0007 5050 8170

Mr. Doug Shoop, Manager
Richland Operations Office
United States Department of Energy
Post Office Box 550, MSIN: A5-14
Richland, Washington 99352

Re: Closure and Compliance Schedule for General Notice of Potential Violation (GNOPV) of Code of Federal Regulations (CFR) 40 CFR 61.93 and Radioactive Air Emissions License (RAEL) FF-01 Issued Under AIR 16-112

References:

1. Letter AIR 16-112, "General Notice of Potential Violation (GNOPV) of Code of Federal Regulations (CFR) 40 CFR 61.93 and Radioactive Air Emissions License (RAEL) FF-01," dated January 28, 2016
2. Letter 17-ESQ-0022, "General Notice of Potential Violation (GNOPV) of Code of Federal Regulations (CFR) 40 CFR 61.93 and Radioactive Air Emissions License (RAEL) FF-01," dated February 08, 2017

Dear Mr. Shoop:

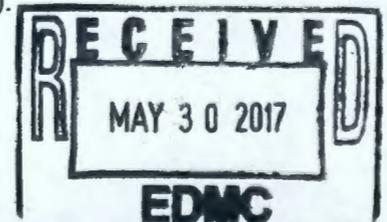
This letter is in response to the U.S. Department of Energy Richland Operations Office's (USDOE) response to three potential violations of Federal, State, or Licensed Requirements. The following summarizes:

- Each potential violation (which are detailed in reference 1).
- USDOE's response to each potential violation (set out in full in reference 2).
- Final disposition of each potential violation.

291-A-1, PUREX (EU 369)

Summary

Between March 10 and March 17, 2015, USDOE was in potential violation for knowingly operating an emission unit (EU) without providing the required continuous sampling as required by Washington Administrative Code (WAC) 246-247-075(14) at the 291-A-1; PUREX (EU 369).



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USDOE Response Summary

USDOE proposed a temporary fix to the sample line (already completed) and a proposed long-term redesign and installation of the improved system.

Final Disposition

The continued operation of the EU was a violation as detailed in the first paragraph of AIR 16-112. The compliance strategy you responded with (Attachment 1 of Reference 2) does not address the actual occurrence of the violation. It only addresses the actions taken to provide a temporary fix to the sample line and proposed long-term redesign.

The corrective action required to close the violation is for USDOE to submit an approved schedule for the installation of the improved system to the Departments of Health and Ecology within three months of this letter.

291-A-1, PUREX (EU 369) and 296-B-1, B-Plant (EU 402)

Summary

It was discovered that the required continuous monitoring systems were removed from both EUs sometime before 2003.

USDOE Response Summary

USDOE provided documentation that the Department of Health had approved the removal of the continuous monitoring systems prior to their actual removal. To address concerns about timeliness of detection of off-normal conditions, USDOE proposed to change the sample frequency of current systems to every two weeks.

Final Disposition

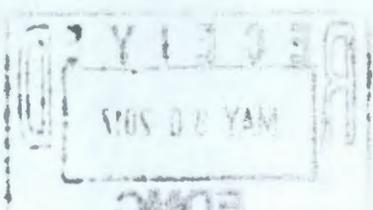
It is agreed that evidence provided by USDOE showed that USDOE requested and received concurrence to remove the continuous monitoring systems prior to their removal. Therefore, no violation occurred.

USDOE's proposal to change sample frequency to two weeks addresses the concern of continuous monitoring of the sources and meets the requirement of Method 114. USDOE shall implement this change and the FF-01 license revisions shall be submitted within two months of receipt of this letter.

296-H-212, Canister Storage Building (EU 435)

Summary

To accommodate an air filtering system, USDOE operated a sampling system at 9,000 cubic feet per minute (CFM). This airflow is below the validated stack flow design region of 9,050 to 9,300 CFM. By operating outside of the design parameters of the sampling system, USDOE may be in violation of WAC 246-247-075(13).



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USDOE Response Summary

USDOE provided evidence showing the actual stack flow emission rate below the designed stack flow sampling range did not impact the sample data validity. With the sample data still being valid, no emission criteria were exceeded.

USDOE has already addressed the operation of the EU by replacement of the air filtering system.

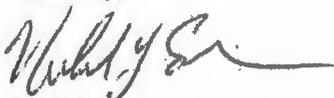
Final Disposition

It is agreed that the evidence provided supports the validity of the data collected when the EU was operating outside of the design flow range. The replacement of the air filtering system addresses future operations.

USDOE will submit a license revision within two months of receipt of this letter. The submission of the revision will close the issue.

If you have questions regarding this response, please contact Mr. John Martell (Health) at (509) 946-3798 or john.martell@doh.wa.gov or Mr. Philip Gent (Ecology) at (509) 372-7983 or philip.gent@ecy.wa.gov.

Sincerely,



Mikel J. Elsen
Director
Office of Radiation Protection
Department of Health



Alexandra K. Smith
Program Manager
Nuclear Waste Program
Department of Ecology

cc electronic:

Dennis Faulk, EPA
Tim Hamlin, EPA
Doug Hardesty, EPA
Nancy Helm, EPA
Jim McAuley, EPA
Dan Meyer, EPA
Cliff Clark, USDOE-RL
Eric Faust, USDOE-RL
Chris Kemp, USDOE-ORP
Jeff Fry, USDOE-RL
Moses Jaraysi, CHPRC
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Earl Fordham, WDOH

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John Schmidt, WDOH
Philip Gent, Ecology
CHPRC Correspondence Control
Environmental Portal
USDOE-RL Correspondence Control

cc: Stuart Harris, CTUIR

Gabriel Bohnee, NPT
Isabelle Wilder, Wanapum
Russell Jim, YN
Susan Leckband, HAB
Administrative Record
RAES Tracking: Line 15-120, EPA HPV Case
#A000A54942 (EU 369), WA000A58696 (EU369)
WA000A58697 (EU402), WA000A58698 (EU 435)