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STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

1315 W. 4th Avenue • Kennewick, Washington 99336-6018 • (509) 735-7581

April 13, 2004

Mr. Roy J. Schepens  
Office of River Protection  
United States Department of Energy  
P.O. Box 450, MSIN: H6-60  
Richland, Washington 99352

RECEIVED  
APR 19 2004

EDMC

Dear Mr. Schepens:

Re: Request for a Variance from Secondary Containment Standards for  
Ten Double-Shell Tank (DST) System Dangerous Waste Transfer Lines,  
03-ED-127, Dated September 4, 2003

60255

The Washington State Department of Ecology (Ecology) has reviewed the United States Department of Energy's request for a variance to operate ten (10) waste transfer lines (SN-277, SN-278, SN-279, SN-280, SL-177, SL-178, SL-179, SN-285, SN-286, LIQW-702) without system upgrades on the end one-foot sections of the lines that penetrate either a pit or building wall. These one-foot sections of lines have inadequate secondary containment that does not meet Washington Administrative Code (WAC) 173-303-640(4)(f).

Ecology agrees that the lines may be operated without upgrading under the following conditions:

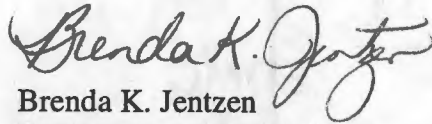
- The lines must be hydraulically leak tested annually, or prior to use if the lines are used less often than once a year. The hydraulic leak testing will be conducted at 150% of the maximum operating pressure during liquid transfers or system flushing, for a minimum of 1 hour with less than a 5% drop.
- Material balance will be assessed for all transfers through the lines.
- Radiological monitoring will be provided during each transfer at the most likely locations for a leak and pooling to occur.
- The lines will obtain a certified integrity assessment in accordance with Hanford Federal Facility Agreement and Consent Order Milestone M-048-14.
- Any leaks from the line will be remediated in accordance with (WAC) 173-303-640(7).

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The double-shell tank permit will reflect these conditions and any necessary information required by WAC 173-303-640(4)(g).

Ecology grants a variance under the above conditions. If you have any questions regarding this letter, please contact me at (509) 736-5707 or Jeff Lyon at (509) 736-3098.

Sincerely,



Brenda K. Jentzen  
Environmental Specialist  
Nuclear Waste Program

cc Mary Jarvis, USDOE  
Brad Erlandson, BNI  
Edward Aromi, CH2M  
Chris Kemp, CH2M  
Phil Miller, CH2M  
John Bates, FH  
Ro Vinson, PEC  
Todd Martin, HAB  
Stuart Harris, CTUIR  
Pat Sobotta, NPT  
Russell Jim, YN  
Ken Niles, ODOE  
Al Conklin, WDOH  
**Administrative Record:** DST and Tank Waste Storage  
Environmental Portal