



Department of Energy
 Richland Operations Office
 P.O. Box 550
 Richland, Washington 99352

1241904

[00733834]

17-ESQ-0020

DEC 12 2016

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

Dear Ms. Smith:

RESPONSE TO DANGEROUS WASTE COMPLIANCE INSPECTION ON APRIL 28, 2016, AT THE B PLANT COMPLEX, RESOURCE CONSERVATION AND RECOVERY ACT (RCRA) SITE ID: WA7890008967, NUCLEAR WASTE PROGRAM COMPLIANCE INDEX NUMBER NO.: 16.558

This is in response to the September 29, 2016, (16-NWP-169) letter regarding the compliance inspection of the B Plant Complex performed on April 28, 2016. This letter was officially received on October 5, 2016. The U.S. Department of Energy Richland Operations Office and CH2M HILL Plateau Remediation Company have reviewed the identified non-compliance with Dangerous Waste Regulations cited by the Washington State Department of Ecology. Responses are provided in Enclosure 1.

If you have any questions, please contact us, or your staff may contact Jeffrey A. Frey, Assistant Manager, Safety and Environment, on (509) 376-7727.

Sincerely,

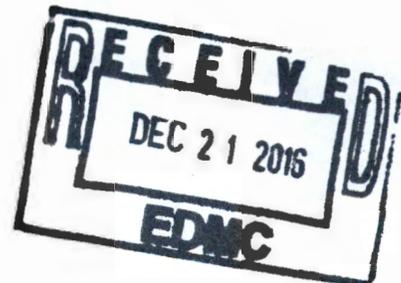
Doug S. Shoop
 Manager

ESQ:DBC

Enclosures:

1. Responses to Alleged Non-compliance in 16-NWP-169
2. Copy of PM/S Data Sheet SM-16-04509 SM-32120, Dated 09-06-2016
3. Copy of Revised Procedure SM-32120
4. Copy of Data Sheet 3 – RCRA Inspection, Dated 07-09-2015

cc: See page 2



Ms. Alexandra K. Smith
17-ESQ-0020

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DEC 12 2016

cc w/encls:

Dave B. Bartus, EPA
Jack L. Boller, EPA
Kathleen A. Conaway, Ecology
Laura J. Cusack, CHPRC
Jerry W. Cammann, MSA
Dennis A Faulk, EPA
Moses N. Jaraysi, CHPRC
Stephanie K. Johansen, CHPRC
Jared W. Mathey, Ecology
John B. Price, Ecology
Kevin Schanilec, EPA
Connie J. Simiele, CHPRC
Ron R. Skinnerland, Ecology
Joel F. Williams Jr, CHPRC
Administrative Record, TSD: S-2-10 (Hardcopy)
Ecology NWP Library (Hardcopy)
Environmental Portal, G3-35
HF Operating Record (J. K. Perry, MSA A3-01)

cc w/o encls:

Gabriel Bohnee, Nez Perce
Russell Jim, YN
Rod Skeen, CTUIR

Enclosure 1
Response to Alleged Non-Compliance 1 in 16-NWP-169

Non-Compliance 1 (from 16-NWP-169): Issues with Inspection Logs

Ecology Reference:

WAC 173-303-400(3), as referenced by the Hanford Facility Resource Conservation and Recovery Act Permit, Dangerous Waste Portion Revision SC- Condition I.A Effect of Permit.

WAC 173-303-320(2)(d). The owner or operator must keep an inspection log or summary, including at least the date and time of the inspection, the printed name and the handwritten signature of the inspector, a notation of the observations made, an account of spills or discharges in accordance with WAC 173-303-145, and the date and nature of any repairs or remedial actions taken. The log or summary must be kept at the facility for at least five years from the date of inspection.

Observations:

I did not observe the time of the inspection on the Data Sheet 1 - B Plant Interior Surveillance for the 221-B building, dated June 17, 2015.

I did not observe the time of the inspection for the Cell 10 Functional Test associated with TK-10-1 tank performed on February 25, 2016. I did not observe the inspector's printed name or handwritten signature for the Cell 10 Functional Test associated with TK-10-1 tank performed on February 25, 2016.

Action Required:

“Immediately upon receipt of this compliance report, USDOE and CHRPC must include the time of the inspection, the inspector's printed name, and handwritten signature on inspection logs. Within 60 days upon receipt of this compliance report USDOE and CHPRC must provide the latest inspection log that includes the time of the inspection, the inspector's printed name, and handwritten signature for the Cell 10 Functional Test inspection.

The 221-B building is inspected yearly therefore, during the next scheduled Ecology inspection, a review of the annual surveillance log to include the time of inspection is expected. Ensure the time of the inspection is documented on the annual surveillance log.”

RL and CHPRC Response:

- 1) The February 2016 test sheet reviewed by Ecology was a one-time use engineering form prepared to support a new test of the tank level indicators that was being evaluated and therefore not subject to the WAC 173-303-320(2) requirements. Following completion of the engineering test and evaluation of the associated data, a decision was made to move forward with the test semi-annually. This was formalized through creation of a

Enclosure 1
Response to Alleged Non-Compliance 1 in 16-NWP-169

new procedure PM/S Data Sheet SM-16-04059 SM-32120 "Cell 10 Liquid Level Monitor System Test." The first functional test under the new procedure was performed on September 6, 2016, (refer to Enclosure 2) for data sheet including the inspector's printed name and signature; though the procedure data sheet itself did not have the "time" listed, the "CHPRC Work Record" does record the approximate time of the inspection. Procedure SM-32120 has since been revised to add the time into the inspection process (refer to Enclosure 3).

- 2) In Procedure 2CP-SUR-B-04008 B Plant Annual Facility and Grounds Surveillance, Revision 3, Change 2, Data Sheet 1 – B Plan Interior Surveillance (221-B), dated June 17, 2015, this area that has inspected in this data sheet is not identified in current revision of the B Plant Complex Part A Form as being part of the treatment, storage, or disposal boundary and therefore is not subject to WAC 173-303-320(2). However, this area is inspected as part of the annual B Plant Surveillance and Maintenance (S&M) in accordance with agreements established in the Tri-Party Agreement, Section 8 - Facility Disposition Process. This area is to be closed under the Comprehensive Environmental Response, Compensation and Liability Act of 1980.

The Resources Conservation and Recovery Act (RCRA) requirements under the S&M Plan are identified in Procedure 2CP-SUR-B-04008 "B Plant Annual Facility and Grounds Surveillance Revision 3, Change 2, Data Sheet 3 – B Plant RCRA Treatment, Storage and Disposal Facility Surveillance (Data Sheet 3) that lists the printed name, date, and time of inspection. A copy of the Date Sheet 3, dated July 9, 2015, (same time period as the Annual S&M Surveillance was performed in June-July 2015), is provided (refer to Enclosure 4) that has the printed name, date, and time of inspection.

PM/S Data Sheet SM-16-04509 SM-32120

09/06/2016 8:12 AM

(Structured)

[CPSM]

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Doc Num	PM/S Num	D/S Status	Record Status	ACT
SM-16-04509 /P	SM-32120	OPEN		
Data Sheet Number	Work Item Title		Record Status	ACT
SM-16-04509 /P	CELL 10 LIQUID LEVEL MONITOR SYSTEM TEST (SA) <8/31.		Record Copy Printed Yes	2

Data Sheet Body

Instructions

Cell 10 Functional Test

1. Notify Operations that there will be a teledac callout alarm for the functional tests performed on the LSH1-100 probe.
2. On the CELL 10 LIQUID LEVEL enclosure in 221-BK: In the top row for the LEVEL AT 2032 MM (80") LSH4-100:
 - a. Push "PROBE TEST 1" pushbutton and Verify the LEVEL OR OPEN CIRCUIT light comes on AND the LSH4-100 alarms is indicated on the HMI as "LLH4-100".
Initial CH Date 9-6-16
 - b. Push the "GROUND TEST 1" pushbutton and Verify the LEVEL OR OPEN CIRCUIT light comes on AND the LSH4-100 alarms is indicated on the HMI as "LLH4-100".
Initial CH Date 9-6-16
3. On the CELL 10 LIQUID LEVEL enclosure in 221-BK: In the second row from the top for the LEVEL AT 1524 MM (60") LSH3-100:
 - a. Push "PROBE TEST 2" pushbutton and Verify the LEVEL OR OPEN CIRCUIT light comes on AND the LSH3-100 alarm is indicated on the HMI as "LLH3-100".
Initial CH Date 9-6-16
 - b. Push the "GROUND TEST 2" pushbutton and Verify the LEVEL OR OPEN CIRCUIT light comes on AND the LSH3-100 alarm is indicated on the HMI as "LLH3-100".
Initial CH Date 9-6-16
4. On the CELL 10 LIQUID LEVEL enclosure in 221-BK: In the third row from the top for the LEVEL AT 1016 MM (40") LSH2-100:
 - a. Push "PROBE TEST 3" pushbutton and Verify the LEVEL OR OPEN CIRCUIT light comes on AND the LSH2-100 alarm is indicated on the HMI as "LLH2-100".
Initial CH Date 9-6-16
 - b. Push the "GROUND TEST 3" pushbutton and Verify the LEVEL OR OPEN CIRCUIT light comes on AND the LSH2-100 alarm is indicated on the HMI as "LLH2-100".
Initial CH Date 9-6-16
5. On the CELL 10 LIQUID LEVEL enclosure in 221-BK: In the bottom row for the LEVEL AT 508 MM (20") LSH1-100:
 - a. Push "PROBE TEST 4" pushbutton and Verify the LEVEL OR OPEN CIRCUIT light comes on AND the LSH1-100 alarm is indicated on the HMI as "LLH1-100".
Initial CH Date 9-6-16
 - b. Push the "GROUND TEST 4" pushbutton and Verify the LEVEL OR OPEN CIRCUIT light comes on AND the LSH1-100 alarm is indicated on the HMI as "LLH1-100".
Initial CH Date 9-6-16
6. Acknowledge and Clear the alarms from the HMI in MO-294.

Acceptance Parameters

Item	Inp Value	Units	Out Value	Units	Low Limit	Up Limit	As Found I/O	As Left
							<u>N/A</u>	

Calibrated Standards/Equipment

Standard/Equipment	Exp Date
<u>N/A</u>	

Facility Group CPSM Component Number: CELL-10-LL-1-4

PM/S Data Sheet SM-16-04509 SM-32120

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[CPSM]

Page 4 of 4

Doc Num	PM/S Num	D/S Status	Record Status	ACT
Data Sheet Number SM-16-04509 /P	SM-32120	OPEN	Record Status	ACT
Work Item Title CELL 10 LIQUID LEVEL MONITOR SYSTEM TEST (SA) <8/31.			Record Copy Printed Yes	2

N/A

Resources

Code	Description	No.	Act Hrs
05	STATIONARY OPERATING ENGINEER	1	_____
18	INSTRUMENT TECHNICIAN	1	<u>3</u>
FWS	Field Work Supervisor	1	_____

Comments

Activity to perform functional test of the B Plant Cell 10 Liquid Level Monitor System on a semi-annual frequency. This frequency is based on engineering judgement that semi-annual is an adequate frequency to perform the functional test. There are not other drivers for what frequency to perform the test. A surveillance step will be added to the surveillance rounds procedure CPSM-PRO-OP-51165, PUREX Surveillance and Monitor Control System (SAMCONS) Rounds.

Annunciator on CC4(294) reads 1932 not for 80" alarm point should be 2032. Needs to be changed in program. Chip Hammond

Work Complete Date

9-6-16
8-6-16

Signature (Print/Sign)

Chip Hammond
Chip Hammond

Date

8-6-16

Completed Satisfactory

Yes / No
(circle one)

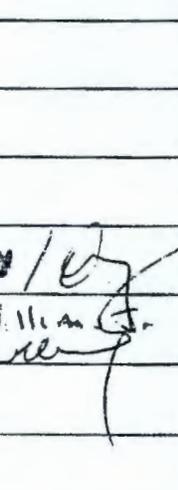
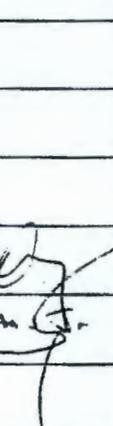
Data Sheet Complete

CHPRC WORK RECORD

1. Document Number:

SM-16-C4509/P

2. Work Item Title: Cell 10 Liquid level monitoring system test (SA) 48/31

FB	Date	PR#	Turnover, Problem Description, Action Taken	Name (Print/Sign)	RES	HRS
	11/7/16		Discussed with CHPRC Regulatory Inspection Lead Joel F. Williams the need to document the start time for the performance of Cell 10 functional test. Contacted Chip Hammond Instrument Tech. who performed functional test and he said he remembered starting at approximately 0830 on 9/6/16. Joel was present when I talked to Chip and heard this phone call.	David Gray /  Joel F. Williams Jr. / 		

NOTE: Entries may be written across all columns to the right of Date, but each entry should be signed.

- FB - √ or X if entry contains feedback to be captured
- PR - Partial Release Number associated with this entry (Optional)
- RES - Craft or Resource Code (optional)
- HRS - Actual hours (optional)

Cell 10 Liquid Level Monitor System Test

1.0 SCOPE**Task 1. Functional Test of the B-Plant Cell 10 Liquid Level Monitor System****2.0 WORK STEPS**

Cell 10 Functional Test

1. Document start time: _____ start date: _____
2. Notify Operations that there will be a teledac callout alarm for the functional tests performed on the LSH1-100 probe.
3. On the CELL 10 LIQUID LEVEL enclosure in 221-BK: In the top row for the LEVEL AT 2032 MM (80") LSH4-100:
 - a. Push "PROBE TEST 1" pushbutton and Verify the LEVEL OR OPEN CIRCUIT light comes on AND the LSH4-100 alarms is indicated on the HMI as "LLH4-100".
Initial _____ Date _____
 - b. Push the "GROUND TEST 1" pushbutton and Verify the LEVEL OR OPEN CIRCUIT light comes on AND the LSH4-100 alarms is indicated on the HMI as "LLH4-100".
Initial _____ Date _____
4. On the CELL 10 LIQUID LEVEL enclosure in 221-BK: In the second row from the top for the LEVEL AT 1524 MM (60") LSH3-100:
 - a. Push "PROBE TEST 2" pushbutton and Verify the LEVEL OR OPEN CIRCUIT light comes on AND the LSH3-100 alarm is indicated on the HMI as "LLH3-100".
Initial _____ Date _____
 - b. Push the "GROUND TEST 2" pushbutton and Verify the LEVEL OR OPEN CIRCUIT light comes on AND the LSH3-100 alarm is indicated on the HMI as "LLH3-100".
Initial _____ Date _____
5. On the CELL 10 LIQUID LEVEL enclosure in 221-BK: In the third row from the top for the LEVEL AT 1016 MM (40") LSH2-100:
 - a. Push "PROBE TEST 3" pushbutton and Verify the LEVEL OR OPEN CIRCUIT light comes on AND the LSH2-100 alarm is indicated on the HMI as "LLH2-100".
Initial _____ Date _____
 - b. Push the "GROUND TEST 3" pushbutton and Verify the LEVEL OR OPEN CIRCUIT light comes on AND the LSH2-100 alarm is indicated on the HMI as "LLH2-100".
Initial _____ Date _____
6. On the CELL 10 LIQUID LEVEL enclosure in 221-BK: In the bottom row for the LEVEL AT 508 MM (20") LSH1-100:
 - a. Push "PROBE TEST 4" pushbutton and Verify the LEVEL OR OPEN CIRCUIT light comes on AND the LSH1-100 alarm is indicated on the HMI as "LLH1-100".
Initial _____ Date _____
 - b. Push the "GROUND TEST 4" pushbutton and Verify the LEVEL OR OPEN CIRCUIT light comes on AND the LSH1-100 alarm is indicated on the HMI as "LLH1-100".
Initial _____ Date _____
7. Acknowledge and Clear the alarms from the HMI in MO-294.

Cell 10 Liquid Level Monitor System Test

Completed By: _____

Printed Name and Signature

Date

Comments:

B Plant Annual Facility and Grounds Surveillance

Published Date: 06/01/2015

CPSM-PRO-OP-50669

Effective Date: 06/01/2015

Data Sheet 3 – B Plant RCRA Treatment, Storage and Disposal Facility Surveillance

Personnel performing the surveillance are to circle the appropriate response for each item being checked. Any item(s) that does not apply is to be circled as "N/A." Any item(s) that does not meet the criteria is to be circled in RED. Any deficiencies noted or other comments are to be recorded on Data Sheet 4.

Sub-Section 4.3

B PLANT RCRA TREATMENT, STORAGE AND DISPOSAL FACILITY SURVEILLANCE			
TSD# TS2-3	Date: 7/9/15	Time Start/End: 0240/	
Item/Criteria	Criteria Met?		
Signage: "Danger – Do Not Enter: Authorized Personnel Only" signs are posted and visible at each approach, visible from 25 feet (if possible), with legible and unobscured print. NOTE: Check all four sides of 276-BA facility fence, R-1 door, R-3 door, R-7 door, R-9 door, R-11 door, 221-BC door, (R-13 door), R-15 door, R-17 door, R-19 door, and stairwells 11 & 13 leading to the craneway, outside entrances to stairwells 1, 3, 9, 15, 17, and 19.	<input checked="" type="radio"/> Yes	No	N/A
Building/Area Secure: Door locks and related postings in place and functional, and no obvious indication of unauthorized entry into or use of facility.	<input checked="" type="radio"/> Yes	No	N/A
Structural Integrity: No damage or deterioration, e.g., structural faults, degradation of tanks or other evidence of loss of facility integrity; no obvious abnormal or unsafe conditions and no leaking transformers, light ballasts, pumps, motors, process piping and other liquid filled components.	<input checked="" type="radio"/> Yes	No	N/A
Ground Subsidence: No indications of ground subsidence (as might be due to water leaking from broken underground pipes, etc.).	<input checked="" type="radio"/> Yes	No	N/A
Water Intrusion (Leaks): No standing water or evidence of current or recent water pathways into or out of TSD areas within the facility.	<input checked="" type="radio"/> Yes	No	N/A
Print name, sign and date below to document completion of surveillance.			
PERFORMED BY: <u>JOSE L. RAMOS</u> <u>[Signature]</u> <u>7/9/15</u>			
Print Name	Signature	Date	
PERFORMED BY:			
Print Name	Signature	Date	
FWS REVIEW: <u>WILL DOREMUS II</u> <u>[Signature]</u> <u>7-9-15</u>			
Print Name	Signature	Date	