

# START

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STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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April 27, 1993

Mr. Steve Wisness  
Hanford Project Manager  
U.S. Department of Energy  
PO Box 550, MSIN A5-15  
Richland, WA 99352



Dear Mr. Wisness:

Re: Emergency plan for tank 241-C-106, pursuant to Milestone M-05-11

Ecology has reviewed the document titled Action Plan for Response to Excessive Temperature in High Heat Source Waste Tank 241-C-106 at the Hanford Site, WHC-EP-0473, December 1992. This plan was submitted to us under milestone M-05-11. The document meets the letter of the milestone by stating that upon detection of a leak from C-106 sufficient supernatant and/or sludge will be removed from this tank to preclude further water additions for cooling. However, the document leaves out most of the detail concerning the actions necessary to pump the waste from C-106. Ostensibly the details for this pumping activity are either contained in other documents, some of which are referenced, or they are being developed in conjunction with the retrieval planning for M-07-00.

This document does little more than reference a very few of the numerous documents pertaining to tank safety and emergency pumping actions, and state that the tank waste will be removed to a level sufficient to preclude further water additions. At the very least this document, if it is to be the governing document for a leak from C-106, should state specifically which documents contain the information concerning preparation, safety clearances, equipment preparation, transfer clearances, receiver tank identification, etc. that must be done prior to the initiation of waste transfer from C-106. Section 6.0 contains numerous documents that are not mentioned specifically in the text, and the reader is left to guess what information may be contained within them.

The document also does not state which, if any, of the actions required to allow pumping of C-106 are being completed ahead of time. It should be assumed that any of the single shell tanks (SSTs) including C-106 could leak at any time. Safety clearances, criticality issues, transfer equipment and pumps, and administrative arrangements should be pursued for C-106 prior to the initiation of a leak, not after a leak has developed.



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Emergency response to leaking SSTs will not be adequate until there are clear procedures to follow, emergency pumping equipment is procured and maintained, and all documentation and analyses are completed before an emergency occurs. With proper preparation, emergency response to a leaking tank should not require any more action than the installation of necessary pumping equipment and a limited administrative process for approval of pumping/waste transfer.

This plan is a start in the right direction for emergency response to a leak from C-106. The above comments must be addressed in order to make this document a useful and complete emergency response guide. Specifically, the text must discuss the various elements outlined above, and any additional activities that are required to prepare for a leak from C-106 and pump the tank out. Any documents referenced in the emergency plan must be provided to Ecology along with the revised document. This is necessary for Ecology to complete a full review of plans and actions surrounding an emergency leak response for C-106. The Action Plan for C-106 must be revised, and submitted to Ecology within 60 days of receipt of this letter. Pending the submittal of additional information, Ecology will consider milestone M-05-11 unfulfilled. If the required elements are submitted within 60 days of receipt of this letter, the matter will be considered resolved under the informal issue resolution process available to the Unit Managers for the SSTs. At that point the milestone will be considered fulfilled, and no further actions will be necessary.

If you have any questions on this topic, please contact me at (206) 459-6725.

Sincerely,



Scott E. McKinney  
Single Shell Tank Unit Manager  
Nuclear and Mixed Waste Management Program

SEM:lj

cc: Guy Bishop, DOE  
Rick Raymond, WHC  
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Subject: EMERGENCY PLAN FOR TANK 241-C-106, PURSUANT TO MILESTONE M-05-11

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