



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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February 13, 2020

20-NWP-033

Brian T. Vance, Manager
Office of River Protection
United States Department of Energy
PO Box 450, MSIN: H6-60
Richland, Washington 99352

Valerie McCain, Project Director
Bechtel National, Inc.
2435 Stevens Center Place, MSIN: H4-02
Richland, Washington 99354

Re: Submittal of the Certification Package that the Waste Treatment and Immobilization Plant Laboratory Facility has been Constructed in Accordance with the *Hanford Facility Resource Conservation and Recovery Act Permit, Dangerous Waste Portion, Revision 8C, for the Treatment, Storage, and Disposal of Dangerous Waste, Part III, Operating Unit Group 10, Waste Treatment and Immobilization Plant (WTP Permit), WA7890008967*

References: See page 3

Dear Brian T. Vance and Valerie McCain:

The Department of Ecology (Ecology) received the Waste Treatment and Immobilization Plant (WTP) Analytical Laboratory (LAB) Facility Certification Package (Reference 1), in accordance with WTP Permit condition III.10.C.2.a.

The submitted package is the final component of the construction certification process. The WTP LAB Facility construction certification was a coordinated effort between Ecology, and the United States Department of Energy – Office of River Protection (USDOE-ORP) and Bechtel National, Inc. (BNI), the Permittees. The scope of this certification includes the LAB Radioactive Liquid Waste Disposal (RLD-VSL-00164) System to support the Direct Feed Low Activity Waste effort.

Ecology is required to verify that the facility has been constructed or modified in accordance with the WTP Permit, and in compliance with Washington Administrative Code 173-303-810(14)(a). This is performed through document reviews, facility walk downs, and the Permittees' submittal of the certification package. The purpose of these steps is to ensure that Ecology can make a thorough assessment that construction and installation of permit-affecting systems and components has occurred in compliance with the WTP Permit.

Based on Ecology's review and information provided by the Permittees, we accept the following two items as post-start conditions. Ecology's acceptance of the Permittees' construction certification does not depend upon these items. The Permittees will provide Ecology a written notification within 60 days of completing these actions:

1. Sealing of the manway for RLD-VSL-00164.
2. Installation of the C3 vault cover.

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The following items are incomplete or missing pre-start conditions. Ecology conditionally accepts the Permittees' construction certification. Ecology's full acceptance of the Permittees' construction certification is contingent upon completion of these items. Once the Permittees submit the following missing information, we will fully accept construction certification, and authorize the Permittees to commence dangerous waste operations.

1. The Independent Installation inspector final inspection and Individual Inspection Report for the stainless-steel liner plate in A-B002 pump pit and A-B003 C3 pump pit.
2. The final Independent Installation Inspection Report for the LAB Radioactive Liquid Waste Disposal System, i.e., the RLD-VSL-00164 tank system.
3. Resubmission of Attachment 6 of Reference 1, that addresses the remaining Ecology comments on the RLD-VSL-00164 tank system Specialized Requirements Verification Matrix.
4. Resubmission of Attachment 9 of Reference 1, Certification by a Washington State Registered Professional Engineer, in accordance with Conditions I.E.12, and III.10.C.2.a, cited in Reference 3. The Certification should include a statement equivalent to that provided in Condition III.10.E.1.d of the WTP Permit. The certification must be signed and stamped by the Registered Professional Engineer licensed in the State of Washington.

Ecology's determination is based on the process presented by the Permittees through References 2 and 3. This process was established to fulfill the construction certification requirements, and satisfy previous agreements made with Ecology. Ecology believes this process provides a thorough demonstration that the WTP facilities have been constructed in compliance with WTP Permit requirements. Ecology appreciates the cooperative spirit and effort by the Permittees for the LAB Facility RLD-VSL-00164 System, and we look forward to working with the Permittees on construction certification for the remaining Direct Feed Low-Activity Waste facilities.

If there are any questions, please contact Jay Decker, WTP Lead Design Engineer, at (509) 372-7948 or jay.decker@ecy.wa.gov.

Sincerely,



Suzanne Dahl
Tank Waste Treatment Section Manager
Nuclear Waste Program

nc/sh

cc: See page 3

References:

1. Letter 20-ECD-0001, dated January 23, 2020, "Submittal of Hanford Facility Resource Conservation and Recovery Act Certification that the Waste Treatment and Immobilization Plant Laboratory Facility has been Constructed in Accordance with the Dangerous Waste Permit"
2. Document 24590-WTP-PL-MGT-09-00001, Rev. 5, approved March 29, 2018, "WTP Dangerous Waste Permit Certification Plan"
3. Memorandum CCN 300576, dated April 10, 2018, "Record Completion of Informal Training: Completing Environmental Protection Activities in Support of Facility Construction Certification"

cc electronic:

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Felice Presti, BNI	Hanford Operating Record
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Hanford Administrative Record
NWP Central File