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STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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September 9, 1993

Mr. James D. Bauer  
U. S. Department of Energy  
P.O. Box 550  
Richland, WA 99352



Dear Mr. Bauer:

Re: Conceptual Design Report for Project W-178, Milestone M-32

I have received the Conceptual Design Report, 219-S Secondary Containment Upgrade, Page W-178, Kaiser Engineers Hanford Company, Richland, Washington, 1993. I have reviewed this report and have the following comments:

This report proposes a completely different solution to the problem of secondary containment than the solution proposed in the engineering study. Further, it proposes a solution that is inferior to the engineering study solution from a regulatory standpoint. I believe that double-shell tanks are better than the tank and liner system proposed, because the tank and liner requires a sump that cannot be completely cleaned. To permit the tank and liner system proposed, we will have to waive the requirements of WAC-173-303. In addition, installation of the liner will require more exposure to safety hazards than a double-wall tank. Please explain why the double-shell tank solution was abandoned.

Providing that a sump is approved, why is the steam-jet pump being abandoned? Steam-jet pumps have excellent performance at low suction head. Does the proposed air operated pump have the same scavenging capacity as the steam-jet pump?

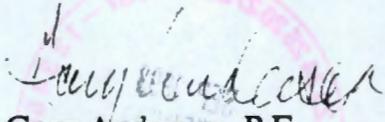
The "sump" paragraph on page six (6), implies that the concrete floor of the tank vaults are thick enough to cut a sump of adequate depth in the existing concrete floor without penetrating the floor. Please furnish a sketch of the proposed sump to show how it will be built.

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These questions are not critical objections, so that you should continue your design effort. Considering the ambiguous status of the Tri-Party Agreement at this time, I can only issue a good faith acknowledgement of this good faith submittal.

If you have questions about this letter, please call me at (206) 438-7558.

Sincerely,



Gary Anderson, P.E.  
Nuclear and Mixed Waste Management Program

GA:dr

cc: Becky Austin, WHC  
Paul Carter, DOE  
Dan Duncan, EPA  
Sue Price, WHC ✓  
Doug Sherwood, EPA  
Donna Wanek, DOE

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