

**Department of Energy**

Richland Field Office

P.O. Box 550

Richland, Washington 99352

**JUL 22 1992**

92-RPB-166

Mr. David B. Jansen, P.E.  
Hanford Project Manager  
State of Washington  
Department of Ecology  
Post Office Box 76000  
Olympia, Washington 98504-7600

Dear Mr. Jansen:

RESPONSES TO ECOLOGY COMMENTS ON DESIGN DOCUMENTATION FOR THE PLUTONIUM FINISHING PLANT LIQUID LOW LEVEL WASTE SYSTEM MODIFICATION, PROJECT B-680H

Enclosed are the responses to the State of Washington Department of Ecology comments on the design documentation for the Plutonium Finishing Plant Liquid Low Level Waste System Modification. The DOE Richland Field Office submitted the design documentation on April 29, 1992, in accordance with Milestone Number M-17-16C in Table D-3 of the Hanford Federal Agreement and Consent Order Proposed Milestone M-17, dated December 4, 1991. Your department will be provided with a final set of design documents once the contract has been awarded.

Should you have any questions, please contact me or Mr. R. N. Krekel of my staff on (509) 376-4264.

Sincerely,

*for James D. Bauer*  
R. D. Izatt, Program Manager  
Office of Environmental Assurance,  
Permits, and Policy

RPB:RNK

Enclosure

cc w/encl:  
G. Anderson, Ecology  
P. T. Day, EPA  
D. R. Sherwood, EPA  
R. E. Lerch, WHC  
R. W. Oldham, WHC  
C. C. Haass, SWEC



**RESPONSES TO ECOLOGY COMMENTS ON DESIGN DOCUMENTATION FOR THE PLUTONIUM  
FINISHING PLANT LIQUID LOW LEVEL WASTE SYSTEM MODIFICATION,  
PROJECT B-680H**

Introduction

On May 13, 1992, Mr. Gary Anderson of the Washington State Department of Ecology (Ecology) transmitted a letter to the U. S. Department of Energy, Richland Field Office (RL) (Attachment 1) containing comments for the design documentation for Project B-680H. The following responses are formatted in the same manner as the Ecology letter with the comment stated first followed by the RL response.

Construction Specifications

Title Page, Page 1

Comment 1: "Although Mr. Jerry V. Fox's qualifications are not in question, Washington Administrative Code-173-240 requires that the engineer stamping these specifications be registered in the State of Washington."

Response: All Engineers identified on the design media are from the Kaiser Engineers Hanford affiliate ICF/Kaiser Engineers Incorporated, located in the State of New Mexico. These engineers are registered professional engineers in the State of New Mexico and they have applied for a Washington State License by reciprocity. The final submittal of subject documents will include their Washington State stamp or a statement that a Washington Registration applications was submitted on a particular date [letter from Mr. Gary Anderson, State of Washington Department of Ecology (Ecology), to Mr. R. D. Izatt, U. S. Department of Energy, Richland Field Office (RL), dated May 21, 1992, (Attachment 2)].

Section 01500, Page 01500-1

Comment 2: "No mention is made of what facilities the contractor will employ to prevent pollution of the environment during construction. This section should include provisions for the temporary storage of hazardous chemicals, fuels etc. in accordance with normal practices."

Response: Provisions that the contractor will employ to prevent pollution of the environment during construction are specified in Section 01100. In addition, Section 01300 requires submittal for identifying handling and storage of hazardous material and waste.

Section 11300, Page 11300-13

Comment 3: "Table No. 1 shows a wastewater characterization for the discharge from this site. The State of Washington Department of Ecology has not yet accepted this characterization nor the sampling and analysis plan presently proposed."

Responses: This deficiency has been clarified by a letter from Mr. Gary Anderson, Ecology, to Mr. R. D. Izatt, RL, dated May 21, 1992. In this letter, Mr. Anderson stated that lack of approval does not constitute a rejection of the documents submitted, nor should it delay construction of the project." The Sampling and Analysis Plan is being revised separately and is not within the scope of this project.

### General

Comment 4: "Numerous forms and tables included in these specifications are illegible. This is sub-professional work."

Response: The specifications will be reviewed for legibility and corrected as applicable prior to final submittal of the documents.

### Design Drawings

#### (1) Several Pages

Comment 1: "Several engineers registered in New Mexico have stamped these drawings. This is not permissible under the laws of the State of Washington.

Response: See Response to Comment 1, Specifications.

#### (2) Several Pages

Comment 2: "These drawings are not clear as to where the special protective coating will be applied.

Response: Special protective coating is specified on H-2-82727 room finish schedule for the building and Drawing H-2-82719 and H-2-82720 for the sump pit/tank pad.

#### (3) Drawing No. H-2-82754

Comment 3: "This drawing does not show the leak detection device or conduit, which presumably leads to it."

Response: The leak detection device is shown on H-2-82741 and is referenced on Drawing H-2-82754 (see note 5 on drawing). Conduit #39 is shown on Drawing H-2-82753, Zone C-7. The Conduit to the leak detector is shown on H-2-82754.

022219

Incoming:9203077  
XREF:9254043D



Attachment 1

STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

Mail Stop PV-11 • Olympia, Washington 98504-8711 • (206) 459-6000

May 13, 1992

Mr. Ron D. Izatt  
United States Department of Energy  
P.O. Box 550  
Richland, WA 99352

Re: Engineering Calculations and Construction Documents, Project B-680H

Dear Mr. Izatt:

We have received the following documents for review:

Construction Specifications for PFP Low Level Waste System Modification, Hanford, Washington for Westinghouse Hanford Company, Kaiser Engineers Hanford Company, Richland, Washington, April 17, 1992.

100% Submittal Calculations and Cut Sheets, Volumes I and II, for Project B-680H, PFP Liquid Low Level Waste System Modification, Hanford, Washington, for Westinghouse Hanford Company, Kaiser Engineers Hanford Company, Richland, Washington, March 18, 1992.

Design Drawings, Project B-680H, PFP Liquid Low Level Waste System Modifications.

Enclosed you will find a list of apparent deficiencies in these documents.

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

Sincerely,

Gary Anderson, P.E.  
Environmental Engineer 3  
Nuclear and Mixed Waste Management

GA:jw  
Enclosure

- cc: Dan Duncan, EPA
- J.M.Hennig, DOE
- R.M.Hiegel, DOE
- Rick Oldham, WHC
- J.E. Rasmussen, DOE
- Doug Sherwood, EPA
- T. Veneziano, WHC
- David Jansen, Ecology
- Toby Michelena, Ecology
- Dave Nylander, Ecology

RECEIVED  
MAY 22 1992  
DOE - RL/CCC  
I92-RPB-207

40.21.2.5

ENCLOSURE

COMMENTS TO DESIGN DRAWINGS, CONSTRUCTION  
SPECIFICATIONS, AND CALCULATIONS, PROJECT B-680,  
PFP LIQUID LOW LEVEL WASTE SYSTEM MODIFICATION

Construction Specifications

1. Title Page, Page 1.

Deficiency:

Although Mr. Jerry V. Fox's qualifications are not in question, WAC-173-240 requires that the engineer stamping these specifications be registered in the State of Washington.

Recommendation:

One of Kaiser Engineers Hanford Company's engineers registered in Washington State should satisfy himself as to the adequacy of these specifications or Mr. Fox should apply for registration in the State of Washington (assuming that New Mexico and Washington have reciprocity).

2. Section 01500, Page 01500-1.

Deficiency:

No mention is made of what facilities that the contractor will employ to prevent pollution of the environment during construction. This section should include provisions for the temporary storage of hazardous chemicals, fuels etc. in accordance with normal practices.

Recommendation:

Detailed specifications for the storage of hazardous wastes should be included in this document and details should be shown on the drawings.

3. Section 11300, Page 11300-13.

Deficiency:

Table No. 1 shows a waste water characterization for the discharge from this site. The Department of Ecology has not yet accepted this characterization nor the sampling and analysis plan presently proposed.

Recommendation:

The Department of Energy should expedite the revision of the sampling and Analysis Plan currently being revised. Acceptance of the rest of these specifications, should it occur, does not constitute acceptance of this table. If the Department of Energy wishes, it may purchase equipment based on this table, but it does so at its own risk. No exceptions to the discharge limits will be made for non-performance of treatment units designed based on this table will be made.

4. General:

Deficiency:

Numerous forms and tables included in these specifications are illegible. This is sub-professional work.

Recommendation: The final submission of these specifications be proofread for legibility.

Design Drawings

1. Several Pages

Deficiency:

Several engineers registered in New Mexico have stamped these drawings. This is not permissible under the laws of the State of Washington.

Recommendation:

See comment No. 1 under Specifications.

2. Several pages

Deficiency:

These drawings are not clear as to where the special protective coating will be applied.

Recommendation:

Clearly show the complete extent of the special protective coating in accordance with WAC 173-303-640.

3. Drawing No. H-2-82754

Deficiency:

This drawing does not show the leak detection device or the conduit which presumably leads to it.

Recommendation:

Show the leak detection device on this drawing, and also show conduit No. 39.

21884

Incoming: 9203077  
XREF: 9254043D

Attachment 2



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

Mail Stop PV-11 • Olympia, Washington 98504-8711 • (206) 459-6000

May 21, 1992

Mr. Ron D. Izatt  
United States Department of Energy  
P.O. Box 550  
Richland, WA 99352

Re: Engineering Calculations and Construction Documents, Project B-680H

Dear Mr. Izatt:

I attended a meeting on January 19, 1992, with Ms. Annabelle Rodriguez of your office, Ms. Kathy Jensen of Westinghouse, and Mr. John Monko of Kaiser Engineers. At that time I agreed to expand upon my previous comments concerning Project B-680H in order to speed up the review process.

If the professional engineers who have stamped these documents have applied to the State of Washington Department of Licensing for registration in Washington, and if these engineers have met the requirements of Washington State Law then their State of New Mexico License entitles them to be licensed in Washington. As far as the Department of Ecology is concerned, a statement on the plans next to the engineer's seal stating that "Washington Registration Applied For (date of application)" will be acceptable.

Table No. 1 cannot be acceptable to this office until a Sampling and Analysis Plan has been formally accepted. This lack of approval does not constitute a rejection of the documents submitted, nor should it delay construction of the project. Our only stipulation is that we cannot be held responsible for non-performance of treatment, should the facility not produce effluent in accordance with Washington Regulations.

RECEIVED  
MAY 26 1992  
DOE - RL/CCC  
I92-RPB-291

110.21.2.5

Mr. Ron D. Izatt  
Page 2  
May 21, 1992

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

Sincerely,



Gary Anderson, P.E.  
Environmental Engineer 3  
Nuclear and Mixed Waste Management

GA:jw

cc: Dan Duncan, EPA  
J.M.Hennig, DOE  
R.M.Hiegel, DOE  
Rick Oldham, WHC  
J.E. Rasmussen, DOE  
Doug Sherwood, EPA  
T. Veneziano, WHC  
David Jansen, Ecology  
Toby Michelena, Ecology  
Dave Nylander, Ecology

## CORRESPONDENCE DISTRIBUTION COVERSHEET

Author	Addressee	Correspondence No.
R. D. Izatt, DOE	David B. Jansen, Ecology	Incoming:9203077 XREF:9254043D

Subject: RESPONSES TO ECOLOGY COMMENTS ON DESIGN DOCUMENTATION FOR THE  
PLUTONIUM FINISHING PLANT LIQUID LOW LEVEL WASTE SYSTEM MODIFICATION,  
PROJECT B-680H

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