



Department of Energy

Richland Field Office
P.O. Box 550
Richland, Washington 99352

MAY 26 1994



TOP:GEB 94-TOP-078

President
Westinghouse Hanford Company
Richland, Washington

Dear Sir:

SST LIQUID LEVEL MONITORING AND REGULATORY COMPLIANCE VIA THE TPA CHANGE PROCESS

The Department of Energy, Richland Operations Office (RL) desires that an agreement be reached between RL and its regulators on what will be done to monitor Single-Shell Tank (SST) liquid levels, and what will be done to improve this monitoring ability, specifically the installation of additional Liquid Observation Wells (LOW's) and the new Enraf instruments. After extensive discussions between our respective staffs, RL believes that the best method to obtain such an agreement is within the Tri-Party Agreement. The intent is to obtain agreement on the means, methods, and frequency by which liquid levels are taken on single-shell tanks, as well as actions to be taken should a liquid level not be taken.

To that end, please prepare a draft change request to the Tri-Party Agreement that provides for this agreement. This draft change request should provide the following:

- a milestone for the implementation of the Operational Specification Document (OSD) for monitoring liquid levels in the single-shell tanks. RL understands that this document will be implemented no later than June 15, 1994, and will cover other tanks besides the single-shell tanks. However, the intent of this change request will be to cover only the SST's, and no other tanks.
- a milestone for the installation of additional LOW's this fiscal year. RL understands that 10 LOW's will be installed by September 30, 1994.
- a milestone for the installation of the new Enraf instruments into all unstabilized SST's which have a liquid surface. RL understands that this will be completed by September 30, 1994.
- milestones for the installation of additional LOW's in SST's in outlying years, until LOW's are installed in all desired SST's. RL believes that as many target milestones be proposed for this as possible, with an interim milestone proposed for the completion of all LOW installation that will be done.

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- milestones for the installation of the new Enraf instruments in additional desired SST's in outlying years. RL believes that as many target milestones be proposed for this as possible, with an interim milestone proposed for the completion of all Enraf installation that will be done.
- the language of the draft change request should allow DOE and WHC to make changes to the order of installation of LOW's and Enraf's (ie, when specific tanks will get the devices), and allow revisions to the liquid level monitoring OSD without approval of the other TPA parties. However, these parties would be notified of all such changes made.

RL believes that as many target milestones should be proposed to cover this work, as possible.

RL believes that this draft should be incorporated within the M-43 series milestones, "Upgrades".

A special discussion must be provided within the change proposal for the action to be taken if a liquid level monitoring OSD requirement is not met (ie, what must be done now.) This can reflect the action statements that are now contained within the OSD that will be implemented in June. The intent is to provide a specific action requirement within the TPA so that failure to complete a monitoring requirement in the OSD does not then become a violation of the TPA. As long as the specific action statement made in the TPA is then performed, no violation of the TPA then occurs.

The draft multi-year program plan and baseline include provisions and funding for this work.

In the preparation of this draft change request, WHC must determine those SST's for which the installation of an LOW is not practical, ie. those tanks which have insufficient material content to allow a LOW to function, and so exclude those tanks. RL recognizes that for technical reasons, LOW's will not function in all SST's. While investigations are continuing, at this time there does not appear to be a replacement device for the LOW's. Therefore, the recognition must be made that as the SST stabilization program is completed, some stabilized tanks may end up without any valid leak detection instrumentation. RL has discussed this position with the regulators, who have agreed with its concept.

Language should be included in the draft change request that states that the milestones assume the installation of the indicated liquid level monitoring device (LOW or Enraf), and that if future technology development identifies superior monitoring devices than those proposed, modifications to the installation schedule will be agreed upon by the parties. The installation schedule and milestones are not intended to preclude the use of other, more advanced or otherwise desirable instruments for monitoring SST liquid levels.

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The draft change request should include both the 100-series and the 200-series SST's.

Please ensure that the proposed installation of the additional LOW's is coordinated with other tank farm work, such as retrieval and tank characterization, and so state this in your response. The concern is that sufficient risers may not exist in all SST's for all planned work.

Please provide your response to this request, including the draft change request, within 30 days of receipt of this letter.

Should you have any additional questions, please contact Guy E. Bishop of my staff on 372-1856.

Sincerely,



Ami B. Sidpara, Manager
Tank Operations Office

TOP:GEB

cc:

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CHANGE PROCESS

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