



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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July 21, 2020

20-NWP-113

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: MS19-A
Richland, Washington 99354

Re: Dangerous Waste Permit Construction Certification Acceptance for the Waste Treatment and Immobilization Plant Analytical Laboratory Waste Management Area and Area Sink Collection Vessel (RLD-VSL-00164).

References: See page 3

Dear Brian T. Vance and Valerie McCain:

The Department of Ecology (Ecology) received the “Remaining Items Required for the Waste Treatment and Immobilization Plant (WTP) Analytical Laboratory (LAB) Facility Certification Package” (Reference 1) from the Permittees, in accordance with WTP Permit condition III.10.C.2.a and as requested in Ecology letter 20-NWP-033 (Reference 2). The Permittees are the United States Department of Energy – Office of River Protection and Bechtel National, Inc.

Based on Ecology’s review of the initial certification package submittal (Reference 3) and as identified in Reference 2, the following two items were considered post-start items. For post-start items, Ecology’s acceptance of the construction certification does not depend upon their completion:

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

As of the date of this letter, the manway for RLD-VSL-00164 has been sealed, but the C3 vault cover has not yet been installed. The Permittees will provide Ecology a written notification within 60 days of installing the C3 vault cover.

The following items were previously identified in Reference 2 as incomplete or missing pre-start conditions that Ecology's full acceptance is contingent upon:

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 3, that addresses the remaining Ecology comments on the RLD-VSL-00164 tank system Specialized Requirements Verification Matrix.
4. Resubmission of Attachment 9 of Reference 3, 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 an Independent Qualified Registered Professional Engineer licensed in the State of Washington.

Ecology reviewed the information submitted in Reference 1, and has determined that the Permittees have provided sufficient documentation to demonstrate that the pre-start items listed above have been completed. Ecology fully accepts the Permittees' construction certification for the WTP LAB Dangerous Waste Management Units included in the scope of the Permittees' construction certification, which included the following:

- The Waste Management Area, specifically including the waste storage area in Room A-0139, Room A-0139A, Room A-0139B, and Room A-0139D. Please note that Room A-0139C was excluded from the scope of construction certification.
- The LAB RLD System Sink Drain Collection Vessel (RLD-VSL-00164), including associated ancillary equipment. Please note that the Hotcell Drain Collection Vessel (RLD-VSL-00165) and associated ancillary equipment were excluded from the scope of this construction certification.

During Ecology's review of Reference 1, we noted the following discrepancies in 24590-CM-FC4-W000-00001-10-00001, Rev 00B, Partial Certification Report for LAB RLD System for Subcontract No. 24590-CM-FC4-W000-00001.

1. In Table 1 of the Report, Item Nos. 3, 4, and 15. In the "Notes" column, the date 9/17/20 appears to be incorrect as compared with other items in the Table. It should be changed to 9/17/15.
2. Attachment C, Visual Inspection Report, Rev 1, for Tank RLD-VSL-00164. The Tank Nominal Diameter is listed as 8.5". It should be 8.5'.

Ecology does not require an updated document to be submitted, but noted the discrepancies herein so that changes can be made if and when the document is revised.

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

Sincerely,



Digitally signed by Dahl,
Suzanne (ECY)
Date: 2020.07.21 10:39:31
-07'00'

Suzanne Dahl
Tank Waste Treatment Section Manager
Nuclear Waste Program

nc/ag

cc: See page 4

References:

1. Letter 20-ECD-0027, dated June 16, 2020, "Submittal of the Remaining Items Required for the Waste Treatment and Immobilization Plant Laboratory Facility Certification Under Permit Condition III.10.C.2.a"
2. Letter 20-NWP-033, dated February 13, 2020, "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"
3. 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"

cc electronic:

Dave Bartus, USEPA
Dave Einan, USEPA
Mary Beth Burandt, USDOE-ORP
Tom Fletcher, USDOE-ORP
Roger Gordon, USDOE-ORP
Lori Huffman, USDOE-ORP
Gae Neath, USDOE-ORP
Delmar Noyes, USDOE-ORP
Bryan Trimberger, USDOE-ORP
Tony McKarns, USDOE-RL
Jean Dunkirk, BNI
Lori Fritz, BNI
Bob Haggard, BNI
Valerie Lagen, BNI
Bret Peck, BNI
Brian Ponte, BNI
Felice Presti, BNI
Mark Quick, BNI
Maggie Schappell, BNI
Jon Perry, MSA
Mason Murphy, CTUIR
Jack Bell, NTP
Rex Buck, Jr., Wanapum
Laurene Contreras, YN
ERWM Staff, YN
Susan Leckband, HAB
Ken Niles, ODOE

Gail Laws, WDOH
Debra Alexander, Ecology
Jennifer Cantu, Ecology
Annette Carlson, Ecology
Nitya Chandran, Ecology
Suzanne Dahl, Ecology
Jay Decker, Ecology
Tracy Gao, Ecology
Mandy Jones, Ecology
Yoana Lucatero, Ecology
Jeff Marusich, Ecology
Dan McDonald, Ecology
Oliver Wang, Ecology
Nancy Ware, Ecology
NWP RIM Coordinators, Ecology
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