

SEP 20 2010

10-ESQ-279

Ms. Jane A. Hedges, Program Manager
Nuclear Waste Program
Washington State
Department of Ecology
3100 Port of Benton Blvd.
Richland, Washington 99354

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EDMC

Dear Ms. Hedges:

PROPOSED ALTERNATIVE TO SUBMIT ADDITIONAL ANCILLARY EQUIPMENT FOR THE SINGLE-SHELL TANK (SST) SYSTEM PART A

- References:
1. Ecology letter from J. J. Lyon to S. J. Olinger, ORP, and C. G. Spencer, WRPS, "Additional Information Must be Submitted for Ecology to Make a Determination on the *Single-Shell Tank System, Revision 12, dated April 29, 2010, Dangerous Waste Permit Application Part A Form,*" dated June 24, 2010. 0088940
 2. Ecology letter from J. Wallace to S. J. Olinger, ORP, and W. J. Johnson, WRPS, "Conditional Approval of the *Single-Shell Tank System, Revision 11, January 30, 2009, Dangerous Waste Permit Application Part A Form,*" dated April 7, 2009. 0080713

This letter requests a proposed alternative for submitting additional information to the SST System Dangerous Waste Permit Application Part A Form (SST Part A), Revision 12, by September 30, 2010, as requested by Reference 1. The proposed alternative is to submit the additional ancillary equipment on March 1, 2011, as part of the annual SST Part A revision requirement previously identified by the Washington State Department of Ecology (Ecology) in Reference 2. The U.S. Department of Energy, Office of River Protection (ORP) and its tank operations contractor, Washington River Protection Solutions LLC (WRPS), are aware of Ecology's concerns in ensuring that all of the SST System tanks and components be identified on the SST Part A with the understanding that ongoing tank closure planning activities are likely to identify additional piping segments or other components, and that the means of identifying SST components may evolve from the Part A to some other mechanism once Revision 9 of the Hanford Facility Resource Conservation and Recovery Act Permit is issued.

During a recent review of the SST Part A component tables, three C-Farm piping segments (2805 E-1, 2805-E2, and 2904-E1) were inadvertently omitted from the April 29, 2010, SST Part A Revision 12 submittal. Mr. Jeff Lyon of your staff, ORP, and WRPS

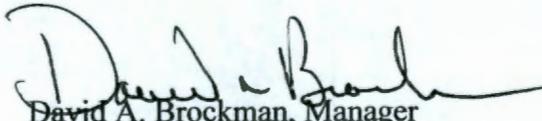
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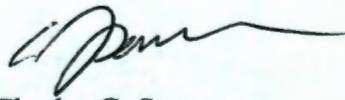
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have discussed in subsequent conversations that instead of submitting the three piping segments on September 30, 2010, it could be acceptable to submit them as part of the next annual revision on March 1, 2011, which will also include other SST components identified as a result of ongoing closure planning activities.

If you have any questions, please contact either of us, or your staff may contact Ms. Lori A. Huffman, Director, Environmental Compliance Division, (509) 376-0104, or Mr. Jack W. Donnelly, WRPS, (509) 373-2119.



David A. Brockman, Manager
Office of River Protection



Charles G. Spencer
President and Project Manager
Washington River Protection Solutions LLC

ESQ:LAH

cc: G. P. Davis, Ecology
J. J. Lyon, Ecology
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TPA Administrative Record (S-2-4)
Environmental Portal, LMSI
WRPS Correspondence