

START

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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July 31, 1996

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

Mr. Ronald J. Bliss
Westinghouse Hanford Company
P. O. Box 1970
Richland, WA 99352



Dear Messrs. Rasmussen and Bliss:

Re: Plutonium Uranium Extraction Facility (PUREX) Storage Tunnels Part B Permit Application, Revision 1, Notice of Deficiency (NOD) List

Enclosed is the Washington State Department of Ecology's (Ecology) NOD comments to the PUREX Storage Tunnels Part B Permit Application, Revision 1, and the U. S. Department of Energy responses. Ecology has received and reviewed Revision 3 of the application and all comments have been closed-out and accepted by Ecology. Revision 3 of the Permit Application is accurate and complete in accordance with the Washington Administrative Code 173-303, with final decision pending public review.

Ecology will move forward to include the PUREX Storage Tunnels in the Dangerous Waste Portion of the Hanford Facility Wide Resource Conservation and Recovery Act (RCRA) Permit for the Treatment, Storage, and Disposal of Dangerous Waste through Modification B in 1996.

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If you have any questions regarding the above, or the enclosed NOD, please contact me at (509) 736-5702.

Sincerely,



Robert J. Julian
PUREX Unit Manager
Nuclear Waste Program

RJ:sb
Enclosure

cc: Clifford Clark, USDOE
Doug Sherwood, EPA
Roger Bowman, WHC
Sue Price, WHC

Administrative Records: PUREX Storage Tunnels Part B Permit Application

THE PUREX STORAGE TUNNELS
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1. Forward, page iii, line 14. The permit application states that storage of mixed waste is regulated under the *Resource Conservation and Recovery Act of 1976*. The handling and storage of mixed waste at the Hanford Reservation is also regulated by and will be permitted under the *Dangerous Waste Regulations, Chapter 173-303 WAC*.

Ecology Requirement: Edit the text accordingly.

RL/WHC Response: The text will be edited to include reference to the *Dangerous Waste Regulations, Chapter 173-303 WAC*.

Ecology Acceptance/Rejection: Accepted August 9, 1991

2. Forward, page iii, line 37. Subpart X of 40 CFR 264 is referenced for a miscellaneous unit. The appropriate citation for the *Dangerous Waste Regulations* will be WAC 173-303-680, Miscellaneous Units.

Ecology Requirement: Revise the text to refer to the Washington Administrative Code here and other instances as appropriate.

RL/WHC Response: The text will be edited to include the cited reference to the Washington Administrative Code as appropriate.

Ecology Acceptance/Rejection: Accepted August 9, 1991

3. Acronyms and Abbreviations, page vii. The section on Acronyms and Abbreviations is too brief. It should be expanded to also include Definitions of terms subject to ambiguity (e.g., site vs. unit).

Ecology Requirement: Expand this section accordingly. Refer to the 616 Nonradioactive Dangerous Waste Storage Facility Part B Permit Application for guidance.

RL/WHC Response: The Acronyms and Abbreviations section will be expanded to be similar to the Definition Section, currently being developed for the Hanford Facility Permit. The PUREX Tunnels Part B definitions section, Section 1.4, will be developed in accordance with the content of the Hanford Facility Permit.

Ecology Acceptance/Rejection: Conditionally Accepted, August 9, 1991. Accepted - Appendix 2-B of DOE/RL-91-28.

4. Page 1-1, line 35. The permit application states that there are 17 railcars stored in Tunnel Number 2 as of January 1, 1990. On page iii of the Forward, the permit application is stated to contain information available as of August 31, 1990. It does not seem reasonable that the number of railcars in this tunnel would not be known on a more current basis.

Ecology Requirement: State how many railcars are currently stored in the tunnels. Information regarding materials stored in these tunnels must be as current as possible. Revise the text as appropriate, here and elsewhere in the permit application.

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RL/WHC Response: The permit application will be revised to specify the number of railcars stored in each of the tunnels as of January 1, 1991. Ecology will be notified of future increases or decreases in the number of railcars stored in the tunnels via the TSD facility annual dangerous waste report issued per WAC 173-303-390 (2).

Ecology Comment: U.S. DOE/WHC states, "Ecology will be notified of future increases or decreases in the number of railcars stored in the tunnels via the TSD Facility annual dangerous waste report issued per WAC 173-303-390(2)." This statement is not part of the proposed revised text.

Ecology Requirement: This statement must be incorporated in the revised text.

RL/WHC Response: The statement will be incorporated.

Ecology Acceptance/Rejection: Conditionally Accepted August 9, 1991. Accepted - Revision 2 incorporates change.

5. Page 1-4, line 45. The permit application mentions clean closure. Ecology is current developing policy on closure standards for TSD units with mixed waste contamination. Guidance will be provided as soon as it is available.

RL/WHC Response: The policy regarding closure standards for TSD units with mixed waste will be incorporated into the permit application as appropriate when it becomes available. This policy will be discussed in association with the development of the Hanford Facility Permit.

Ecology Acceptance/Rejection: Conditionally Accepted August 9, 1991. Accepted - Revision 2 incorporates change.

6. Page 1-5, line 43. The permit application discusses permit modifications. The new version of the *Dangerous Waste Regulations* uses a different classification system for permit modifications and is considerably more extensive.

Ecology Requirement: Revise this section of the permit application so that it will be in accordance with the version of chapter 173-303 WAC which will be in effect at the time of permit issuance.

RL/WHC Response: The permit application will be revised as requested.

Ecology Acceptance/Rejection: Conditionally Accepted August 9, 1991. Accepted - Revision 2 follows latest WAC revision and Publication #95-402.

7. Page 2-3, line 16. Typographical Error: "...and transite annex..."

RL/WHC Response: Permit application text will be corrected.

Ecology Acceptance/Rejection: Accepted - August 9, 1991

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| 8. | <p>Page 4-8, line 35. The permit application states that if a hazardous material were released from its container, "... no significant impact to the environment would occur." This statement is unsubstantiated.</p> <p><u>Ecology Requirement:</u> Provide documentation supporting this statement in the form of a Safety Analysis Report or other equivalent document with the next NOD Response Table or delete this statement from the permit application.</p> <p>RL/WHC Response: Statement will be deleted from the permit application.</p> <p>Ecology Acceptance/Rejection: Accepted - August 9, 1991</p> |
| 9. | <p>Page 4-9, line 31. Typographical Error: Milestone M-21-01 does not exist; the correct milestone should be M-22-01</p> <p>RL/WHC Response: Permit application text will be corrected accordingly.</p> <p>Ecology Acceptance/Rejection: Accepted - August 9, 1991</p> |
| 10. | <p>Page 6-3, line 7. Typographical Error: "These are..." should be "There are..."</p> <p>RL/WHC Response: Permit application text will be corrected.</p> <p>Ecology Acceptance/Rejection: Accepted - August 9, 1991</p> |
| 11. | <p>Page 6-3, line 36. The permit application mentions dangerous waste signs.</p> <p><u>Ecology Requirement:</u> Describe these signs in detail.</p> <p>RL/WHC Response: A detailed description of the signs will be added to the permit application.</p> <p>Ecology Acceptance/Rejection: Accepted - August 9, 1991</p> |
| 12. | <p>Page 6-3, line 37. Typographical Error: "...are in tact, visible..."</p> <p>RL/WHC Response: Permit application text will be corrected.</p> <p>Ecology Acceptance/Rejection: Accepted - August 9, 1991</p> |
| 13. | <p>Page 6-3, line 42. The permit application states "...verification is conducted by observing an indicator light and a pressure differential gage located in the PUREX Plant operating records." This does not make sense; the instruments would not be located in the operating records.</p> <p><u>Ecology Requirement:</u> Clarify what was meant by the above quoted statement. Revise the text as necessary.</p> <p>RL/WHC Response: Permit application text will be revised.</p> <p>Ecology Acceptance/Rejection: Accepted - August 9, 1991</p> |

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14. Page 6-6, line 1. The permit application states that water will not be used for fire control at the PUREX Storage Tunnels.

Ecology Requirement: Describe what fire controls measures would be used in the event of a fire.

RL/WHC Response: A description of fire control procedures will be included in the permit application.

Ecology Comment: Heavy Equipment and cranes would be used in the event that a fire causes the tunnels to collapse.

Ecology Requirement: Describe the time frame in which this equipment would be employed. Discuss the effect this would eventually have on the waste retrieval plans for closure.

RL/WHC Response: Additional information will be added to the proposed revised text as requested.

Ecology Acceptance/Rejection: Accepted - Revision 2 incorporates change.

15. Page 6-6, line 43. Control of run-off is described, however, this description actually discusses run-on. Both run-on and run-off must be discussed.

Ecology Requirement: Revise the text accordingly.

RL/WHC Response: Permit application text will be revised to provide discussions of both run-on and run-off.

Ecology Acceptance/Rejection: Accepted - August 9, 1991

16. Page 6-7, line 42. Backup or redundant systems are not provided for the ventilation system in Tunnel 2.

Ecology Requirement: Provide information on the hazards due to failure of the ventilation system.

RL/WHC Response: The discussion of the ventilation system for Tunnel 2 will be expanded to address hazards associated with failure of the system.

Ecology Acceptance/Rejection: Accepted - August 9, 1991

17. Page 6-8, line 9. A full faced respirator is mentioned. It is not clear if this is a supplied air or purifying air respirator.

Ecology Requirement: Clarify what type of respirator is used.

RL/WHC Response: Types of respirators used will be specified in the permit application.

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Ecology Acceptance/Rejection: Accepted - August 9, 1991

18. Page 7-1, line 14. USDOE/RL states that parts of the contingency plan serve to fulfill requirements other than Ecology's. Ecology agrees that sections of the documents not subject to regulation by Ecology should be excluded from the permit(s). Any part(s) of submitted documents not applicable to the permit application will not be adopted as part of the permit and therefore will not be subject to the modification requirements of WAC 173-303-830.

Ecology Requirement: Documents submitted for the permit which contain extraneous information should be accompanied by a cover letter indicating which chapter(s) or section(s) are applicable to the permit application, or, conversely, should be excluded.

RL/WHC Response: This comment will be resolved in accordance with the development of the Hanford Facility Permit. The PUREX Tunnels Part B will be revised in accordance with the content of the Hanford Facility Permit.

Ecology Acceptance/Rejection: Accepted - Revision 2 incorporates change.

19. Page 11-1, line 38. The plan states that closure of the PUREX Tunnels will be performed in conjunction with the 200-PO-1 and 200-PO-2 operable units. Closure must be performed in compliance with WAC 173-303-610(4).

Ecology Requirement: Revise the closure plan accordingly.

RL/WHC Response: The closure plan will be revised to include the cited reference.

Ecology Acceptance/Rejection: Accepted - August 9, 1991

20. Page 11-1, line 46. The closure plan states that closure will take place after removal of the stored equipment and that the removal will be performed in conjunction with, "the final disposition of equipment from the PUREX Plant. A common equipment disposal method will be established as part of the PUREX Facility closure." Removal of the equipment is part of the closure of the PUREX Tunnels.

Ecology Requirement: Revise the text to accurately reflect the closure process. Note also that the PUREX Facility Part B Permit Application scheduled to be submitted in September 1992 must allow for removal of mixed waste from the tunnels to the canyon area and contain the proposed treatment discussed in this permit application's closure plan.

RL/WHC Response: Chapter 4.0 will be revised to allow for the transfer of railcars into and out of the Tunnels as part of normal operations. Chapter 11.0 will be revised to indicate that closure will take place after all equipment is removed from the tunnels. The text will be clarified to indicate that removal of the equipment from the railcars

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and subsequent treatment will be addressed in the PUREX Plant Part B once details and engineering are available.

Revised RL/WHC Response: Chapter 4.0 will be revised to allow for the transfer of railcars into and out of the Tunnels as part of normal operations. Chapter 11.0 will be revised to indicate that closure will take place after all equipment is removed from the tunnels. The text will be clarified to indicate that removal of the equipment from railcars and subsequent treatment will occur either at the PUREX Plant or at other onsite TSD unit.

Ecology Acceptance/Rejection: Conditionally Accepted - August 9, 1991.
Accepted - Revision 2 has new Chapter 11.

21. Page 11-2, line 42. The plan discusses clean closure requirements that are not equivalent to those of WAC 173-303-610(2).

Ecology Requirement: The closure requirements stipulated in WAC 173-303-610(2) must be met in order to clean close. See comment number 5.

RL/WHC Response: The closure plan will be revised to reflect the closure requirement stipulated in WAC 173-303-610(2).

Ecology Comment:

The proposed revised text discusses meeting the closure performance standards by removal or decontamination of dangerous waste or waste residue to background or regulatory thresholds. If these levels are not attainable, then health-based, MTCA derived, standards will be used. This discussion does not include the requirement that non-attainment of the standards stipulated in WAC 173-303-610(2)(b) will necessitate compliance with the post-closure requirements stipulated in WAC 173-303-610(7) through -(11).

The proposed text also states that samples will be obtained from the gravel and soil materials of the tunnel floors but no sampling method is given. The method for obtaining these samples must be included in this plan.

The paragraph on background determination must be expanded to a meaningful level; it is too vague for unambiguous interpretation.

Ecology Requirement: Revise the text to correct the shortcomings outlined in the above comment.

RL/WHC Response: The closure plan text will be revised as requested. Additional information on background establishment, soil sampling, and actions to be taken in the event closure standards are not attainable, will be added.

Ecology Acceptance/Rejection: Accepted - Revision 2 has new Chapter 11.

22. Page 11-4, line 7. The plan states, "No partial closure is anticipated for the PUREX Storage Tunnels."

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Ecology Requirement. Discuss the statement with regard to the conclusion of RHO-CD-1076 (September 1980, G. R. Silvan), which states on page 33, "if the contents of the tunnel must be removed, it should be deactivated as soon as possible to ensure the tunnel is still structurally sound during the removal operation."

RL/WHC Response: Although no partial closure of the PUREX Storage Tunnels is anticipated, the structural integrity of Tunnel Number 1 has been questioned (Silvan 1980). To resolve this issue, an assessment of structural integrity is being conducted. Should the assessment of Tunnel Number 1 determine that closure of the tunnel is warranted, a partial closure of the waste management unit will be initiated. Closure of Tunnel Number 1, i.e. partial closure of the waste management unit, would not affect the operation of Tunnel Number 2. Closure of Tunnel Number 1 would be performed in accordance with the established closure plan.

Ecology Comment: The proposed text states, "Closure of Tunnel Number 1 would be performed in accordance with the established closure plan."

Ecology Requirement: The closure plan must allow for partial closure of the PUREX Tunnels.

RL\WHC Response: The closure plan will be revised to allow for partial closure.

Ecology Acceptance/Rejection: Accepted - Revision 2 has new Chapter 11.

23. Page 11-4, line 37. Minor modifications to the permit in accordance with WAC 173-303-830(4) to the permit are discussed. WAC 173-303-830 is being revised significantly in the next version of the *Dangerous Waste Regulations*.

Ecology Requirement: Revise the text to be in accordance with the next version of the *Dangerous Waste Regulations* which will be in place at the time of permit issuance.

RL/WHC Response: The text will be revised to address the most current requirements for permit modifications.

Ecology Comment: The revised text does not appear to be related to the comment. However the text raises the following questions:

- 1) Does the projected volume for Tunnel Number 2 include the volume currently in Tunnel Number 1?
- 2) Will future storage procedures require removal and treatment for any of the dangerous waste constituents (e.g., mercury)?

Ecology Requirement: The section on permit modifications should be revised as proposed. The above questions must also be answered.

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RL/WHC Response: The initial comment addressed a statement regarding permit modifications which was included on page 11-7, line 37 of Revision 0. The statement regarding revisions to the closure cost estimates has been deleted from the section as modifications to permit applications are now addressed in Chapter 1.0 (refer to NOD Comment Number 6).

The text will be modified to answer questions as requested.

Ecology Acceptance/Rejection: Accepted - Revision 2 answers questions.

24. Page 11-5, line 37. The removal of the stored inventory is discussed. No mention is made of how it will be determined that no additional mixed waste exists in or on these failed equipment parts and railcars.

Ecology Requirement: Discuss how it will be established that the inventory not known to contain mixed waste does not contain mixed waste.

RL/WHC Response: Identification and separation of the mixed waste from the equipment will be addressed in the PUREX Plant Part B Permit Application when details become available.

Revised RL/WHC Response: No treatment of mixed waste will occur at the PUREX Storage Tunnels. Details associated with the characterization of the waste removed from the PUREX Storage Tunnels will be addressed in the permit application submitted for the subsequent treatment facility (PUREX Plant or other onsite TSD unit).

Ecology Acceptance/Rejection: Conditionally Accepted - August 9, 1991.
Accepted - Revision 2 has new Chapter 11.

25. Page 11-6, line 26. The plan states that a radiation survey will be initiated well in advance of PUREX Storage Tunnels Closure.

Ecology Requirement: State when this investigation is scheduled to begin. Include details such as time frames for technology development.

RL/WHC Response: The details associated with removal of railcars from the tunnels have been removed from Chapter 11.0 and added to Chapter 4.0. The reference to an overall radiation survey has been deleted.

Ecology Acceptance/Rejection: Conditionally Accepted - August 9, 1991.
Accepted - Revision 2 has new Chapter 11.

26. Page 11-11, line 33. The professional engineer certification is not consistent with other closure plans.

Ecology Requirement: Revise the certification statements so that it is consistent with other closure plans. Refer to the 183-H Solar Evaporation Basins Closure Plan for guidance.

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RL/WHC Response: The closure plan certification statement will be revised to be consistent with the outcome of discussions associated with development of the Hanford Facility Permit.

Ecology Acceptance/Rejection: Conditionally Accepted - August 9, 1991.
Accepted - Revision 2 has new Chapter 11.

27. Page 11-12, line 33. The closure plan states that because this is a federal facility, the closure cost estimate is not required.

Ecology Requirement: The application must state that closure cost estimates will be provided by October 1, 1991, and will be updated annually thereafter. These estimates are being required under the facility reporting requirements of WAC 173-303-390. At this time, Ecology is not requiring that these estimates be provided as part of the financial requirements under WAC 173-303-620. However, these estimates must be provided in the same level of detail that is required for the purpose of the financial requirements.

RL/WHC Response: The permit application will be revised to indicate that closure cost information will be provided as part of the annual reporting requirements of WAC 173-303-390. The schedule for initial submittal of projections of anticipated costs will be established as part of discussions associated with the development of the Hanford Facility Permit.

Ecology Comment: Closure cost estimates will be provided as part of the annual report required by WAC 173-303-390. The proposed text does not reference the citation.

Ecology Requirement: Revise the text to state "...in an annual report submitted to Ecology in accordance with WAC 173-303-390.

RL/WHC Response: The text will be modified as requested.

Ecology Acceptance/Rejection: Accepted - Revision 2 has new Chapter 11.

28. Page 12-1. The Dangerous Waste Regulations are in the process of being revised.

Ecology Requirement: Ensure that the reporting and record-keeping requirements of the new revision will be met.

RL/WHC Response: The text will be revised to address the most current requirements for spill reporting.
The requirements will be incorporated once they become available.

Ecology Acceptance/Rejection: Conditionally Accepted - August 9, 1991.
Accepted - DOE/RL-91-28 updated.

29. Page 12-4, line 32. Ecology is in the process of developing consistent spill reporting requirements. These requirements will be formally

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provided to USDOE/RL as soon as possible. In any case, reports should be made to Ecology's Kennewick office, (509) 546-2977.

Ecology Requirement: Revise the contingency plan accordingly.

RL/WHC Response: The permit application will be revised to reflect the latest spill reporting requirements agreed upon in discussions associated with development of the Hanford Facility Permit. The requirements will be incorporated once they become available.

Ecology Acceptance/Rejection: Conditionally Accepted - August 9, 1991.
Accepted - DOE/RL 93-75 released.

30. Appendix 7A, page 1. The emergency plan mentions RL Procedures Manuals.

Ecology Requirement: Describe these manuals further.

RL/WHC Response: RL procedures manuals will be described in the text.

Ecology Comment: Revised text is proposed which further describes the procedures referred to in the emergency plan. This text remains inadequate.

Ecology Requirement: The emergency plan references a number of documents for procedures that are to be used in implementing the emergency plan. The referenced procedures must also be prepared in tabular form detailing, at a minimum, the following:

- o Emergency type,
- o Procedure document number,
- o Procedure document title,
- o Applicable page, section, or chapter reference, and
- o Procedure manual location.

RL/WHC Response: The requested information (with the exception of procedure manual location) is included in Appendix 7A, page 96 of 141. The location of the procedure manuals will be specified in Chapter 7.0 of the permit application.

Ecology Acceptance/Rejection: Accepted - WHC-IP-0603-218-E-14/15 released and information is contained therein.

31. Appendix 7A, page 3. Figure 1.b of the 200 East Area is illegible.

Ecology Requirement: Provide a legible copy.

RL/WHC Response: All figures in Appendix 7A will be reviewed. Legible copies will be provided where needed in the next revision of the emergency plan.

Ecology Acceptance/Rejection: Conditionally Accepted - August 9, 1991.
Accepted - Revision has legible copies.

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32. Appendix 7A, page 14. Document number WHC-IP-0603 is referenced on the Building Emergency Review Checklist.

Ecology Requirement: Describe this document and provide a copy under with the next NOD Response Table.

RL/WHC Response: The Building Emergency Plan Review Checklist, form 54-6000-369, is a form used at the Hanford Site to record training completion at both hazardous and non-hazardous units. The two documents referenced on the checklist as WHC-IP-0263-(), applicable to hazardous units, and WHC-IP-0603-(), applicable to non-hazardous units, describe the type of emergency plan which is applicable and reviewed. Because the PUREX Facility is categorized as a hazardous unit, WHC-IP-0603 is not applicable. Because WHC-IP-0603 is not applicable, further discussion is not considered appropriate.

Ecology Comment: Document number WHC-IP-0603 is described as applicable only to non-hazardous units.

Ecology Requirement: This should be made clear on the form or in the descriptive text.

RL/WHC Response: The Building Emergency Plan Review Checklist is a sitewide form used to document emergency training at all facilities located on the Hanford Site. This form is used to document emergency training at both hazardous units and nonhazardous units. Emergency plans for hazardous units, such as the PUREX Facility are included in document number WHC-IP-0263. Emergency plans for non hazardous units are included in document number WHC-IP-0603.

The Building Emergency Plan Review Checklist includes a location to identify the specific emergency document reviewed with the employee. If this was the emergency plan for a hazardous facility such as the PUREX Plant, "202A" would be entered in the parentheses following "WHC-IP-0263" indicating that emergency plan WHC-IP-0263-202A was reviewed with the employee. If the emergency plan reviewed was for a nonhazardous facility the document reviewed would be entered in the parentheses following "WHC-IP-0603".

WHC-IP-0603 is not referenced anywhere within the PUREX Facility Emergency Plan nor is it referenced on the Building Emergency Plan Review Checklist. To facilitate form completion, space is provided on the Building Emergency Plan Review Checklist to enter the applicable emergency plan reviewed with the employee. This will either be a plan in WHC-IP-0263 or a plan in WHC-IP-0603. No change is proposed to the existing document.

Ecology Acceptance/Rejection: Accepted - DOE/RL, Revision 2 is released.

33. Appendix 7A, page 16. The HMRT is referred to by acronym only.

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Ecology Requirement: Acronyms should be avoided in this type of document and the minimum should be spelled out in the first usage.

RL/WHC Response: The text will be revised to define the acronym. Additionally, the next revision of the Emergency Plan will include an acronyms list.

Revised RL/WHC Response: The text will be revised to define the acronym. An acronyms list will be added to Appendix 7A defining acronyms used in the emergency plan.

Ecology Acceptance/Rejection: Accepted - August 9, 1991

34. Appendix 7A, page 31. DOE Order 5484.1 is referenced.

Ecology Requirement: Provide a copy of this order.

RL/WHC Response: A copy of DOE Order 5484.1 is attached to the NOD Response Table (Attachment A). (DOE Order submitted with initial NOD Response Table)

Ecology Acceptance/Rejection: Accepted - August 9, 1991

35. Appendix 7A, page 103. The emergency equipment list is incomplete and does not give the locations of the emergency equipment. (The referenced map is illegible).

Ecology Response: Provide a comprehensive inventory with specific amounts and locations of equipment as required by WAC 173-303-350.

RL/WHC Response: An emergency equipment list identifying specific amounts and locations of equipment will be incorporated into the emergency plan in the next revision. The requested inventory of emergency equipment is attached to the NOD Response Table (Attachment B). (Equipment list submitted with initial NOD Response Table)

Ecology Acceptance/Rejection: Accepted August 9, 1991

36. General Comment. The MSDS states an Ecology reportable quantity. Ecology is currently developing a spill reporting policy. This will be provided to USDOE as soon as it is available.

RL/WHC Response: The MSDS will be removed from the emergency plan. Reference will be made to the location of the MSDS files in the next revision of the emergency plan.

Ecology Comment: The comment discusses the use of MSDS's as they apply to spill reporting. Although the text revision (removal of the MSDS's from the application) will remove this problem from the permit application, DOE/WHC should note that sole reliance on a manufacturer's MSDS to determine Ecology notification is not advisable.

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Ecology Acceptance/Rejection: Conditionally Accepted - August 9, 1991.
Accepted - MSDS removed from revision 2.

37. Appendix 11A, page 11. It is assumed that the closure activities for the PUREX Storage Tunnels will occur in conjunction with the closure activities for the PUREX Plant. This may be appropriate for Tunnel 2, but Tunnel 1 was found to be of adequate but questionable integrity in 1980.

Ecology Requirement: Evaluate the assumption that both tunnels will be closed in conjunction with the PUREX Plant, Demonstrate that postponing closure of Tunnel 1 will not result in a more difficult closure due to failure of the timbers. Refer to the second paragraph of page 11A-16.
RL/WHC Response: An assessment of structural integrity of Tunnel Number 1 has been initiated. Should the results of the assessment indicate unacceptable risk associated with continued operation of Tunnel Number 1, the tunnel will be closed.

Ecology Acceptance/Rejection: Conditionally Accepted - August 9, 1991.
Accepted - Revision 2 has new Chapter 11.

38. Appendix 11A, Page 42. The weighting factors included in the evaluation of closure options do not accurately reflect the ordering cited in the text. For example, the text states, "Personnel protection was considered to be the most important item overall (ALARA evaluation and industrial health and safety) followed by compliance with the present regulatory framework." However, the weighting factors assigned were the same for ALARA evaluation and regulatory acceptability (4.0) and smallest overall for industrial health and safety (1.5). Furthermore, on page 11.A-56 it states, "determination of a preferred alternative will be based on regulatory acceptability..."

Ecology Requirement: Correct those inconsistencies and the evaluation of closure alternatives to accurately reflect the stated criteria ordering.

RL/WHC Response: Inconsistencies in the engineering evaluation will be corrected.

Ecology Acceptance/Rejection: Conditionally Accepted - August 9, 1991.
Accepted - Revision 2 has new Chapter 11.