



OFFICE OF RIVER PROTECTION

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MAY 01 2014

14-ECD-0021

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Ms. Hedges:

FOLLOW-UP REPORT TO THE *FIFTEEN-DAY REPORT FOR IMPLEMENTATION OF THE CONTINGENCY PLAN AT THE 242-A EVAPORATOR* AND NOTIFICATION OF RESUMPTION OF OPERATIONS

Reference: ORP letter from K.W. Smith to J.A. Hedges, Ecology, "Fifteen-Day Report for Implementation of the Contingency Plan at the 242-A Evaporator," 13-ECD-0082, dated October 22, 2013.

This letter is a follow-up report to the Reference and provides notification of resumption of operations after implementation of the contingency plan required by the Washington State Department of Ecology Dangerous Waste Regulations WAC 173-303-360(2)(k). When the referenced report was provided on October 22, 2013, the causal analysis and corrective actions had not been completed and therefore report, item (ix) in the Reference attachment was not addressed. Item (ix) stated:

(ix) Description of corrective action taken to prevent reoccurrence of the incident. U.S. Department of Energy, Office of River Protection's contractor, Washington River Protection Solutions LLC has initiated actions for the recovery from this event. Corrective action taken to prevent reoccurrence of the incident will be determined. A follow-on report will be provided once the event investigation and causal analysis is complete.

The cause of the event was determined to be that the hazard identification was not adequate based on assumptions about historical information, inadequate work package instructions, and workers performing the work were not involved in planning meetings.

The following corrective actions have been identified as actions to prevent reoccurrence of the incident, which are scheduled for completion by June 30, 2014:

- Review and update as needed, standards for work planning, work instruction, development, and the job hazard analysis form for the breach of fluid systems

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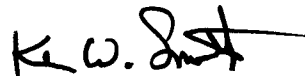
- Communicate the revised information/expectations from the changes in work planning and hazards analysis
- Schedule an emergency preparedness drill
- Develop internal lessons learned from the event.

Regarding the need for a resumption of operations notification, the Hanford Facility Resource Conservation and Recovery Act Permit for the 242-A Evaporator contains the following requirement in Chapter 7.3.4:

- If this plan was implemented according to Section 7.3, the Washington State Department of Ecology is notified before operations can resume. The Permit Attachment 4, *Hanford Emergency Management Plan* (DOE/RL-94-02, Section 5.1) discusses different reports to outside agencies. This notification is in addition to those required reports and includes the following statements:
 - There are no incompatibility issues with the waste and released materials from the incident.
 - All the equipment has been cleaned, fit for its intended use, and placed back into service.

The contingency plan for the 242-A Evaporator was implemented as described in the Reference and therefore the follow-up resumption of operations notification is required. In order to resume operations, Washington River Protection Solutions LLC has determined there are no incompatibility issues with the waste and release materials from the incident. No equipment from the Contingency Plan (Chapter 7.0, Tables 7.4.1 through 7.4.5) was used to respond to the incident; therefore, no equipment is needed to be placed back into service.

If you have any questions, please contact me, or your staff may contact Lori A. Huffman, Director, Environmental Compliance Division, (509) 376-0104.



Kevin W. Smith
Manager

ECD:MEB

cc: See page 3

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