



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

1315 W. 4th Avenue • Kennewick, Washington 99336-6018 • (509) 735-7581

March 13, 2000

Mr. Richard French
U.S. Department of Energy
Office of River Protection
P.O. Box 550, MSIN: A6-54
Richland, Washington 99352

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EDMC

Ms. Mary Delozier
CH2M Hill
P.O. Box 1500, MSIN: H7-07
Richland, Washington 99352

Dear Mr. French and Ms. Delozier:

Re: Time Deployment Study for Annulus Pumping in Double-Shell Tanks

The Washington State Department of Ecology (Ecology) performed a dangerous waste compliance inspection of the SY double-shelled tank (DST) farm on March 28, 1998. This inspection resulted in five (5) violations of Chapter 40, Code of Federal Regulations (CFR), as referenced by Washington Administrative Code (WAC) Chapter 173-303, Dangerous Waste Regulations. Four (4) of the five (5) violations have been addressed; however, one violation remains unresolved. This unresolved violation is failure by the U.S. Department of Energy (USDOE) and its contractors to operate the secondary containment of the DSTs to remove waste within twenty-four (24) hours, or in as timely a manner as possible. USDOE issued a letter to Ecology dated October 30, 1999. The October 30th letter included a schedule for completion of all activities to ensure the DSTs are operated to remove waste from secondary containment in as timely a manner as possible.

Ecology met with USDOE and its contractors in November 1999 to review schedules for resolving this violation. At that time, USDOE presented Ecology with a draft Time Deployment Study for procurement and readiness to deploy pumping equipment into the DSTs in the event of a leak of the primary tank structure. Ecology accepted USDOE's schedule in its October 30th letter for operating the DSTs to meet waste removal from secondary containment requirements and agreed to review the final draft of the Time Deployment Study when issued in February 2000. The Time Deployment Study will provide the basis for revising the DST Emergency

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Pumping Guide, as well as scheduling for procurement of emergency pumping equipment and its deployment. Ecology agreed to withhold formal enforcement of this violation contingent upon the following actions by USDOE:

1. The schedule for Phase I (all actions described in the schedule for fiscal year [FY] 2000) presented in USDOE's October 30, 1999, letter will be implemented without delay. Any delay to any part of this schedule must be reported to Ecology immediately.
2. Ecology must receive a copy of the Time Deployment Study described in the schedule attached to USDOE's October 30, 1999, letter, on or before February 28, 2000. The scope of the Time Deployment Study must include time required to deploy emergency pumping equipment to each of the twenty-eight (28) DSTs, including those DSTs equipped with existing as-built pumps and those without existing as-built pumps.
3. Ecology will review the Time Deployment Study to determine if it satisfactorily addresses regulatory requirements to remove liquids from the secondary containment of DSTs in a timely manner and to assess if implementation of Phase II of the schedule attached to USDOE's October 30, 1999, letter is warranted.
4. Section 3.6 of the DST Emergency Pumping Guide (HNF-3484, Rev. 1) shall be revised by May 30, 2000, to reflect operation of each of the DSTs according to items 2 and 3 above.

On February 28, 2000, Ecology received a copy of USDOE's Time Deployment Study. Ecology finds the Time Deployment Study satisfactory with the following exceptions:

- Section 8.5 of the study does not specify the periodicity for routine testing to ensure the pumping equipment remains in good operating condition.
- The Time Deployment Study (e.g., Section 10.0) does not identify riser availability for each DST for insertion of emergency pumps.

Ecology advises that the Time Deployment Study must be revised to address the two (2) bulleted items listed above and that the DST Emergency Pumping Guide must also include these items when it is issued to Ecology in May 2000.

Please be advised that Ecology considers preparedness to remove liquids from DST secondary containment an open violation until all the actions described above are complete. In the interim, regarding preparedness to pump liquids from secondary containment, the DSTs shall be operated to HNF-3484, Rev. 1.

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If you have any questions regarding this letter, please feel free to contact me at (509) 736-3031.

Sincerely,



Bob Wilson
Nuclear Waste Program

BW:sb

cc: Dana Bryson, USDOE
James Rasmussen, USDOE
Brad Erlandson, CH2M Hill
Mary Lou Blazek, OOE
Administrative Record: DST & 204-AR