



OFFICE OF RIVER PROTECTION
P.O. Box 450, MSIN H6-60
Richland, Washington 99352

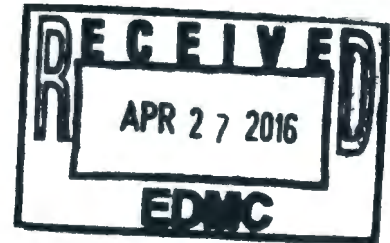
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16-TF-0044

APR 27 2016

Ms. Alexandra K. Smith, Program Manager
Nuclear Waste Program
Washington State Department of Ecology
3100 Port of Benton Blvd.
Richland, Washington 99354



Ms. Smith:

THE U.S. DEPARTMENT OF ENERGY, OFFICE OF RIVER PROTECTION
TRANSMITTAL OF TOC-ENV-NOT-2016-4201 AND TOC-ENV-NOT-2016-4213, *SECTION II.B.6, CONTINUING OBLIGATION TO REPORT SAFETY ISSUES AND PROVIDE RECOVERY PLAN*, IN RESPONSE TO SECTION II.B.6 OF THE 241-AY-102 SETTLEMENT AGREEMENT

Reference: Pollution Control Hearings Board, State of Washington, 241-AY-102 Settlement Agreement, PCHB No. 14-041c, signed and submitted September 29, 2014, effective October 2, 2014.

In accordance with Section II.B.6 of the Reference, on February 22, 2016, TOC-ENV-NOT-2016-4201, *Section II.B.6, Continuing Obligation to Report Safety Issues and Provide Recovery Plan*, provided notification to the Washington State Department of Ecology (Ecology) of a Stop Work as a result of a safety issue with self-contained breathing apparatus (SCBA) regulators.

In accordance with Section II.B.6 of the Reference, on March 15, 2016, TOC-ENV-NOT-2016-4213, *Continuing Obligation to Report Safety Issues and Provide Recovery Plan*, provided notification to Ecology of the status of the SCBA regulator safety issue. The notification detailed the resolution of the safety issue and the implementation of a recovery plan to get the 241-AY-102 retrieval project back on schedule. The recovery plan actions accelerated the remaining work activities to meet the 241-AY-102 waste retrieval readiness schedule.

The purpose of this letter is to formally transmit to Ecology TOC-ENV-NOT-2016-4201 and TOC-ENV-NOT-2016-4213, the SCBA safety issue and recovery plan notifications.

APR 27 2016

If you have any questions, please contact Thomas W. Fletcher, Assistant Manager for Tank Farms, Office of River Protection, at (509) 376-3434, or Jessica Joyner, Environmental Protection, Washington River Protection Solutions LLC, at (509) 376-7533.



Mark A. Lindholm, President and Project Manager
Washington River Protection Solutions LLC



Kevin W. Smith, Manager
Office of River Protection

Attachment

cc w/attach:

J. Alzheimer, Ecology
J. Lyons, Ecology
N. Menard, Ecology
K. Wold, Ecology
C. Whalen, Ecology
R. Utley, WDOH
R.M. Allen, WRPS
S.B Cherry, WRPS
N.R. Davis, WRPS
R.E. Gregory, WRPS
R.D. Greenwell, WRPS
S.P. Guillot, WRPS
J.A. Joyner, WRPS
M.F. Tavelli, WRPS
M.A. Lindholm, WRPS
R.B. McPherson, WRPS
K. McNeel, WRPS
R.J. Sams, WRPS
D.K. Smith, WRPS
D.W. Strasser, WRPS
J.A. Voogd, WRPS
T.R. Williams, WRPS
Administrative Record
Environmental Portal, LMSI
WRPS Correspondence Control

ATTACHMENT 1

16-TF-0044

TOC-ENV-NOT-2016-4201

ENVIRONMENTAL OPERATIONAL ACTIVITIES NOTIFICATION

Date: 2/22 16

TOC-ENV-NOT: 2016-4201

Name: Ruth Allen

Revision No.: 0

Regulatory Requirement: AY-102 Settlement Agreement PCHB 14-041c

RE: Section II.B.6, Continuing Obligation to Report Safety Issues and Provide Recovery Plan

Notification Information:

In accordance with the Settlement Agreement in Washington River Protection Solutions (WRPS) and the U.S. Department of Energy, Office of River Protection (DOE ORP) v. Washington State Department Of Ecology (Ecology), Pollution Control Hearings Board Case No. 14-041c, Section II.B.6, Continuing Obligation to Report Safety Issues and Provide Recovery Plan, WRPS and DOE-ORP are hereby notifying Ecology that a safety issue has been confirmed and a detailed description of specific safety issues is provided below.

On February 18, 2016, a WRPS employee issued a Stop Work, in accordance with TFC-POL-14, "WRPS Safety and Occupational Health" on the use of Self Contained Breathing Apparatus (SCBA) regulators. The Stop Work will be in effect, with the exclusion of Technical Safety Requirements/Environmental/Operating Specifications Document surveillances and emergencies, until the cleaning process is validated. WRPS uses a DOE-approved, Hanford Site-Wide Respiratory Protection Program procedure to sanitize all SCBA regulators.

As a result of this Stop Work, scheduled work in preparation for AY-102 Retrieval was impacted on February 18, 2016 through February 22, 2016. Construction activities requiring completion prior to declaration of readiness for retrieval are on hold until the Stop Work is lifted. Work on AY-102 Retrieval will likely continue to be impacted until the issue is resolved and the Stop Work lifted. WRPS and DOE are actively pursuing mitigation of this issue and will provide a Recovery Plan pursuant to the Settlement Agreement within 30 days.

Additionally, DOE and WRPS are evaluating whether an extension to any deadline for required work in accordance with the AY-102 Settlement Agreement will be necessary. If it is determined that an extension will be necessary, a request will be submitted in accordance with the Settlement Agreement accordingly.

If you need additional information, please contact Tom Fletcher at 509-376-3434 or Doug Greenwell at 509-376-2504.

Distribution of this form shall be completed to the following groups.

Check all applicable distribution lists

Environmental Records

Team Line Management

Other: J. Hedges, J. Lyons, J. Alzheimer, K. Wold, C. Whalen, R. Gregory, T. Fletcher, N. Davis, J. Joyner, K. McNeel, D. Smith, D. Greenwell, J. Johnson, R. Eakins, L. Huffman, R. Allen, S. Guillot, R. Sams

Attach a copy of original notification email and any applicable information when submitting Environmental Notification to Document Control.

ATTACHMENT 2

16-TF-0044

TOC-ENV-NOT-2016-4213

ENVIRONMENTAL OPERATIONAL ACTIVITIES NOTIFICATION

Date: 3/15/2016

TOC-ENV-NOT: 2016-4213

Name: Scott Conrad

Revision No.: 0

Regulatory Requirement: PCHB No. 14-041C Settlement Agreement

RE: Section II.B.6, Continuing Obligation to Report Safety Issues and Provide Recovery Plan

Notification Information:

In accordance with the Settlement Agreement in Washington River Protection Solutions (WRPS) and the U.S. Department of Energy, Office of River Protection (ORP) v. Washington State Department of Ecology (Ecology), Pollution Control Hearings Board Case No. 14-041c, Section II.B.6, Continuing Obligation to Report Safety Issues and Provide Recovery Plan, ORP and WRPS, are required to:

Notify Ecology within twenty-four (24) hours of confirming any safety issue, and provide a detailed description of the specific safety issue. Submit a recovery plan within thirty (30) days of providing this notice to Ecology. If the event creating a safety issue occurs during waste retrieval operations, and the proposed solution is to cease retrieval operations, the recovery plan shall include a schedule for correcting and resuming retrieval operations at the earliest practicable time.

On February 22, 2016, the State of Washington, Department of Ecology was notified of a safety issue resulting in the issuance of a stop work on February 18, and affecting the progress of AY-102 Construction and testing activities.

The initial safety issue related to the use of Self Contained Breathing Apparatus was resolved on February 22, construction activities resumed the same day, and WRPS implemented a schedule recovery plan to mitigate the impact of the stop work on the completion of all activities needed to declare readiness and start AY-102 waste pumping operations. Recovery actions involved accelerating execution the remaining activities with the support of additional resources and work on 7 days a week.

Construction activities were completed on March 2, 2016, Readiness to pump was declared on March 3, 2016, and pumping operations started the same day.

Distribution of this form shall be completed to the following groups. Check all applicable distribution lists

Environmental Records

Team Line Management

Other: T. Tebb, J. Lyons, J. Alzheimer, K. Wold, C. Whalen, R. Gregory, T. Fletcher, N. Davis, J. Joyner, K. McNeel, D. Smith, D. Greenwell, J. Johnson, R. Eakins, L. Huffman, R. Allen, S. Guillot, R. Sams, J. Vood

Attach a copy of original notification email and any applicable information when submitting Environmental Notification to Document Control.