



U.S. Department of Energy
Office of River Protection

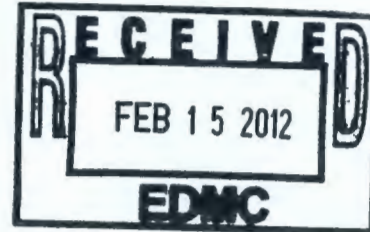
1212005

P.O. Box 450, MSIN H6-60
Richland, Washington 99352

FEB 13 2012

12-ESQ-0030

Mr. R. W. Bradford
Deputy Project Director/Project Manager
Bechtel National, Inc.
2435 Stevens Center Place
Richland, Washington 99354



Dear Mr. Bradford:

CONTRACT NO. DE-AC27-01RV14136 – SUBMITTAL OF U.S. DEPARTMENT OF ENERGY, OFFICE OF RIVER PROTECTION SURVEILLANCE REPORT, S-11-ESQ-RPPWTP-029, HIGH-LEVEL WASTE (HLW) OFFGAS EQUIPMENT INSTALLATION SURVEILLANCE

Reference: ORP letter from J. R. Eschenberg to W. S. Elkins, BNI, "Notification of Dangerous Waste Permit (DWP) Condition/Waste Management Surveillances," 06-ED-019, dated March 6, 2006.

This letter transmits the Waste Treatment and Immobilization Plant surveillance for the HLW offgas equipment installation. The surveillance reviewed the recent design changes to the HLW Offgas Equipment Installation and verified that the Dangerous Waste Permit was appropriately modified. The surveillance team identified no findings or observations.

This letter is not considered to constitute a change to the Contract. In the event the Contractor disagrees with this interpretation, it must immediately notify the Contracting Officer orally, and otherwise comply with the requirements of the Contract clause entitled 52.243-7, "Notification of Changes."

If you have any questions, please contact me, or your staff may contact Paul G. Harrington, Acting Assistant Manager, Office of Environmental Safety and Quality, (509) 376-5700.

Sincerely,

Delmar L. Noyes, Deputy Federal Project Director
Waste Treatment and Immobilization Plant

ESQ:GMN

Attachment

cc: See page 2

Mr. R. W. Bradford
12-ESQ-0030

-2-

FEB 13 2012

cc w/attach:

B. G. Erlandson, BNI

S. L. Dahl, Ecology

Administrative Record (H-0-8)

BNI Correspondence

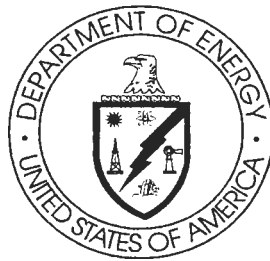
Environmental Portal, LMSI

Attachment
12-ESQ-0030
(6 Pages)

Surveillance Report for the HLW Offgas Equipment Installation

S-11-ESQ-RPPWTP-029

High-Level Waste Facility Offgas Equipment Installation Surveillance



NOVEMBER 2011

Office of Environmental Safety and Quality

U.S. Department of Energy
Office of River Protection
P.O. Box 450, H6-60
Richland, Washington 99352

Table of Contents

Title of Surveillance	1
Dates Surveillance Conducted	1
Surveillance Team	1
Summary of Surveillance Activities	1
Surveillance Conformance Summary	2
Summary of Findings and Observations	4
ORP Management Debriefed	4
Signatures	4

Surveillance Report Number: S-11-ESQ-RPPWTP-029

Division Performing the Surveillance: Office of River Protection, Environmental Compliance Division (ECD)

Integrated Assessment Schedule Number: 54

Title of Surveillance:

High-Level Waste (HLW) Offgas Equipment Installation Surveillance

Dates Surveillance Conducted:

November 15 through 17, 2011

Surveillance Team:

Gae Neath (Lead), ECD and Don Sommer, ECD Support Services.

Summary of Surveillance Activities:

The purpose of the surveillance was to review the recent design changes to the HLW Offgas Equipment Installation and verify whether the Dangerous Waste Permit (DWP) was appropriately modified. The surveillance team identified no findings or observations.

Documentation Reviewed for Surveillance:

- Hanford Facility Resource Conservation and Recovery Act Permit, Dangerous Waste Portion, Revision 8C, for the Treatment, Storage, and Disposal of Dangerous Waste, Part III, Operating Unit Group 10 (Waste Treatment and Immobilization Plant[WTP]), WA7890008967, WTP Permit Conditions III.10.C.9.d and III.10.C.9.h.
- Desk Instruction, Revision 0, WTP Dangerous Waste Permit Design Change Screening.
- Change documents, dated January 1, 2011, to November 3, 2011.

Discussion of Area(s) Reviewed:

The weekly change documents (milk run), occurring between January 1, 2011, and November 3, 2011, were reviewed (See Conformance Summary below). Also, interviews were conducted with the Bechtel National, Inc. (BNI) change documentation database coordinator and the BNI/HLW environmental engineer to determine the number and frequency of reviews of the change documents. The change documents consisted of Construction Deficiency Reports, Non-Conformance Reports, Field Change Notices, Supplier Deviation Disposition Requests (SDDR), and Drawing Change Notices. Of the change documents affecting the HLW offgas system, none were found to require modifications to the DWP.

Conformance Summary

Date	Design Change Documentation	Comments
2011-01-13	24590-WTP-SDDR-MS-10-00144, Plate Thickness for HOP-HX-00002/4	No Permit Change Notice (PCN) needed - the SDDR provided an exception from the spec that was not in DWP
2011-01-27	24590-HLW-3YN-HOP-00017, HLW Melter Offgas Treatment Process System (HOP) System Description Section 7.5. Instrumentation and Control Tables	System Descriptions do not require PCNs - they are in the Admin Record
2011-03-17	24590-HLW-M6N-HOP-00202, Updating Seismic Classification Information for Stack Discharge System Components to Align with Integrated Safety Management CCN: 226891	Safety required clarification/note on Piping and Instrumentation Diagram (P&ID) - no need for PCN. However, a new PCN to update HOP P&IDs (expanded) was scheduled to start December 5, 2011.
	24590-WTP-FC-M-11-0108, HOP Drip Pan Installation Modification and Drawing Error Corrections	Typical drawing for the drip pan was in the Secondary Containment Design document - installation details/corrections were "equivalent"
2011-04-14	24590-HLW-M6N-HOP-00181, HLW - Add Radiation Dose Rate Information for HLW Facility Manual Valves	N/A, Radiological, Non-DWP
	24590-WTP-SDDR-MS-11-00043, HLW - Welding of Welded Plate Heater Core for HOP-HX-00002 & HOP-HX-00004	No need for PCN - spec was not in DWP (i.e., the welding details were not in DWP)
2011-05-05	24590-HLW-M6N-30-00034, Changes to Steam Racks in HLW Melter Core Support Handling System, HLW Canister Decontamination Handling System, Radioactive Liquid Waste Disposal System (RLD), HLW Concentrate Receipt Process System, HOP, and HLW Melter Feed Process System Systems	No need for PCNs - Changes to utilities - will be shown in the next revision of the P&IDs
	24590-HLW-M6N-HOP-00201, Instrument Change	No need for PCNs - Changes to instruments on utilities - will be shown in the next revision of the P&IDs
	24590-WTP-SDDR-MS-11-00046, Stitch Welding of Flow Director on HOP-HX-00002 & HOP-HX-00004	No need for PCN - changes to welding details did not impact the equipment pressure boundary; "equivalent"
2011-05-12	24590-WTP-FC-P-11-0295, HLW - Field Modifications to HLW-HOP-PW00010001-B	Equivalent or better
	24590-WTP-SDDR-MS-11-00060, UBC-97, Section 1632, Component Response Modification Factor for HOP-HX-00002/4	The change met the criteria of the spec that is in DWP
2011-05-19	24590-HLW-M6N-HOP-00164, Modify Pressure Control Valve for Pulse Jet Mixer	Utility changes will be shown on the revised P&ID

Date	Design Change Documentation	Comments
	(PJM) Controllers; Add Valve Tags to Fluidics/PJM Controllers; Replace Hand Valve with Globe Valve	
2011-05-26	24590-QL-MRA-MKH0-00002-T0004, HLW Pulse Jet Ventilation System and HOP Remote Change HEPA Filter Housing Interconnecting Piping Scope of Design	Changes addressed the vendor scope
2011-07-21	24590-HLW-MVN-HOP-00018, HLW - Add Beta/Gamma Dose Rate to HLW HOP High Efficiency Mist Eliminator Vessel Data Sheet	N/A, Radiological, Non-DWP
2011-08-25	24590-HLW-M6LN-30-00009, HLW - Revise the Paint Codes for HLW Facility Lines in High Pressure Steam, HOP, Instrument Service Air System, RLD, and Steam Condensate Water Systems	Changes were to the Line Lists, not to the design
2011-09-01	24590-HLW-M6LN-HOP-00007, Piping Changes for HOP Pressure Safety Valves (PSV)	Utility changes will be shown on the revised P&ID
	24590-HLW-M6LN-HOP-00013, Piping Changes for HOP PSVs	Utility changes will be shown on the revised P&ID
2011-09-08	24590-WTP-FC-P-11-0521, HLW - Eliminate East Weld on HLW-HOP-H10822	Change to pipe support; "equivalent or better"
2011-09-15	24590-HLW-M6N-HMP-20012, HOP Misting Nozzle Quality Level	Changes did not impact any design documents submitted to DWP; P&IDs may show the change in quality designations
	24590-HLW-M6N-HOP-00073, HOP Misting Nozzle Quality Level	Changes did not impact any design documents submitted to DWP; P&IDs may show the change in quality designations
2011-09-22	24590-WTP-FC-M-11-0356, HLW - HOP Drip Pan Support Alterations	Field correction; no change to fit form or function (equivalent or better)
2011-10-06	24590-HLW-M6N-HOP-00078, HLW - Holds and Note Additions for HOP System	No design changes
	24590-WTP-FC-M-11-0381, HLW - HOP Drip Pan Support Alterations (Part 2)	Typical drawing was in the Secondary Containment Design - installation details/corrections were "equivalent or better"
2011-10-13	24590-HLW-M6N-HOP-00076, HLW - Addition of Bellows Numbers	No design changes, equivalent or better (changes will be shown in revised P&IDs)
	24590-HLW-M6N-HOP-00203, HLW - Revise Flow Control Signals for HOP Thermal Catalytic Oxidizer and Add Alarm Symbols	Control signals/changes will be shown on expanded P&IDs
2011-10-27	24590-WTP-FC-P-11-0666, HLW - Reduce Weld on HLW-HOP-H10822	Change to pipe support; "equivalent or better"
2011-11-03	24590-WTP-FC-M-11-0408, HLW - HOP Drip Pan - Weld Corrections	Typical drawing was in the Secondary Containment Design - installation

Date	Design Change Documentation	Comments
		details/corrections were "equivalent or better"

Conclusion:

The surveillance team found the design changes to the HLW offgas equipment did not affect the DWP, such that a modification to the DWP would have been required.

Findings and Observations:

No findings or observations were identified.

ORP Management Debriefed:

Lori Huffman, Director ECD

Signatures


 _____ 02/07/2012
 Gae M. Neath Date
 Surveillance Team Lead


 _____ 2/7/2012
 Lori A. Huffman, Director ECD Date