



Office of River Protection

P.O. Box 450
Richland, Washington 99352

MAR 06 2003

03-ED-019

Mr. Michael A. Wilson, Program Manager
Nuclear Waste Program
State of Washington
Department of Ecology
1315 W. Fourth Avenue
Kennewick, Washington 99336

RECEIVED
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EDMC

Dear Mr. Wilson:

**SUBMITTAL OF DANGEROUS WASTE PERMIT COMPLIANCE SCHEDULE
PRETREATMENT PERMIT DESIGN PACKAGES PTF-002, PTF-003, AND PTF-006**

- References:
1. Ecology letter from M. A. Wilson to R. J. Schepens, ORP, "Request for Temporary Authorization to Start Construction of the Waste Treatment and Immobilization Plant," dated December 18, 2002.
 2. ORP letter from J. E. Rasmussen to M. A. Wilson, Ecology, "Request for Temporary Authorization for Construction Activities at the Waste Treatment and Immobilization Plant (WTP)," dated December 10, 2002.

This letter submits revisions to Pretreatment Facility (PTF) permit design packages in accordance with Reference 1. Revisions to the following permit design packages are included in Attachment 1.

- PTF-002: Tank System Secondary Containment for PTF Elevation 0 ft.;
- PTF-003: Containment Building for PTF Elevation 0 ft. (Hot Cell and Maintenance Areas); and
- PTF-006: Miscellaneous Treatment Units Secondary Containment for PTF Elevation 0 ft.

The State of Washington Department of Ecology (Ecology) comments provided in Reference 1 have been incorporated into the above permit design packages. In addition, responses to Ecology comments were reviewed with Ecology's staff on January 8, 2003, and are provided in Attachment 2.

The revisions to the drawings contained in these permit design packages reflect enhancements that improve readability and clarity between the General Arrangement Plan and its associated Sections and improved consistency between source drawings and those provided for permitting purposes. These revisions do not interfere with the technical content or basis for the drawings that were used by the Independent, Qualified, Registered Professional Engineer (IQRPE) in preparing the IQRPE Independent Assessment Report (24590-CM-HC4-HXYG-00138-02-01A, Revision A).

Please also note that as part of the ongoing design process, Bechtel National Inc. (BNI) is developing design changes and a trend to remove several of the PTF bulges. The proposed changes have not yet been incorporated into plant drawings and design media; once the design

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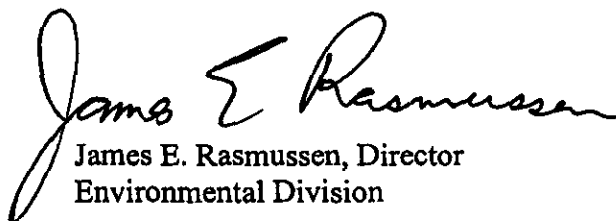
media is modified, a permit modification request will be submitted prior to construction of related secondary containment and tank systems, as appropriate.

BNI has implemented several corrective actions to prevent reoccurrence of similar omissions in future permit design package submittals. Those corrective actions included performing a consistency review across all components of the attached permit design packages. Additionally, BNI has also implemented a more stringent checking, review, and approval process for future permit design packages.

In Reference 1, it is also stated that Ecology would reconsider issuing a temporary authorization once revised information was received. Therefore, I am requesting Ecology reconsider my previous request (Reference 2) for temporary authorization for 180 days to start construction on the portions of the PTF as described in the above design packages in advance of receiving the final permit decision. Ecology approval of a temporary authorization to proceed with construction activities is necessary to support continued construction on the PTF.

If you have any questions, please contact Lori A. Huffman, Environmental Division, (509) 376-0104.

Sincerely,



James E. Rasmussen, Director
Environmental Division

ED:LAH

Attachments: (3)

cc w/attachs:

B. G. Erlandson, BNI
R. F. Naventi, BNI
J. Cox, CTUIR
S. L. Dahl, Ecology
J. Grantham, Ecology
S. J. Skurla, Ecology
S. A. Thompson, FHI
J. L. Hanson, INNOV (w/o attachs)
P. Sobotta, NPT
J. B. Hebdon, RL
A. C. McKarns, RL
R. Jim, YN
Administrative Record
Environmental Portal, LMSI

Attachment 1
03-ED-019

Permit Design Packages
PTF-002, PTF-003, and PTF-006