



0067349

STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

3100 Port of Benton Blvd • Richland, WA 99352 • (509) 372-7950

October 17, 2005

Mr. Roy J. Schepens  
Office of River Protection  
United States Department of Energy  
P.O. Box 450, MSIN: H6-60  
Richland, Washington 99354

RECEIVED  
OCT 27 2005

EDMC

Mr. Edward S. Aromi, Jr.  
CH2M Hill Hanford Group, Inc.  
P.O. Box 1500, MSIN: H6-63  
Richland, Washington 99354

Dear Mr. Schepens and Mr. Aromi:

Re: August 9, 2005 Inspection on the Reported Completion of Double Shell Tank Farm  
Upgrades Required by Hanford Federal Facility Agreement and Consent Order  
Milestone M-43-00

Thank you for the assistance from the United States Department of Energy - Office of River Protection (USDOE-ORP) and CH2M Hill Hanford Group (CH2M) personnel during the Washington State Department of Ecology's (Ecology) recent inspection of the completion of DST upgrades per Hanford Federal Facility Agreement and Consent Order Milestone M-43-00.

Milestone M-43-00, due June 30, 2005, required the completion of a number of specific double shell tank (DST) equipment upgrades to achieve compliance with the Resource Conservation and Recovery Act requirements for tank systems. The purpose of this inspection was to determine whether all required DST upgrades have been completed. Ecology considers the specific requirements of M-43-00 to have been met and no violations will be assessed; however, Ecology has the following concern.

CONCERN

Under milestone M-48-14, due March 31, 2006, ORP is required to submit a written integrity assessment report for the entire DST system. It was noted during the course of this inspection that the Independent Qualified Registered Professional Engineer (IQRPE) who will complete this integrity assessment is intending to use information gathered from previously completed construction integrity assessments for individual components or



Mr. Roy J. Schepens and Mr. Ed S. Aromi, Jr.

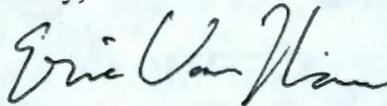
October 17, 2005

Page 2

projects within the DST system. The individual construction integrity assessments completed prior to March 2004, are incomplete and lacking substantive information on the integrity of upgraded components of the DST system. The use of these construction integrity assessments solely, without the gathering of further information, is not adequate to meet the requirements of M-48-14 to certify the entire DST system. ORP and CH2M should ensure that further data will be gathered by the IQRPE who will certify the DST system under M-48-14 and be incorporated into the written integrity assessment.

Do not hesitate to contact me at (509) 372-7929, if you have any questions.

Sincerely,



Eric Van Mason  
Compliance Inspector  
Nuclear Waste Program

EVM: pll

cc: Jim Rasmussen, USDOE  
Moses Jarayasi, CH2M  
Phillip Miller, CH2M  
Ro Vinson, PAC  
Stuart Harris, CTUIR  
Gabriel Bohnee, NPT  
Russell Jim, YN  
Todd Martin, HAB  
Ken Niles, ODOE  
Administrative Record: TWRS  
Environmental Portal