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STATE OF WASHINGTON

## DEPARTMENT OF ECOLOGY

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April 16, 1992

Mr. R.D. Izatt  
U. S. Department of Energy  
P.O. Box 550  
Richland, WA 99352-0550

Re: Westinghouse Hanford Company, Tank Farm Upgrades Program Plan WHC-EP-0392, Dated June 1991


Dear Mr. Izatt:

I have reviewed this document and have the following comments:

1. Page 2-24, Top of page. How will the modified procedures proposed here relate to the regulatory standard procedures in force at this time?
2. Page 4-3, Section 4.2. Environmental Documentation Requirements. No discussion of WAC 173-460 Controls for New sources of Toxic Air Pollutants is presented. This regulation applies to the Hanford Site.
3. Page 6-2, Last Paragraph, Electrical. Will transformer replacement increase risks from PCB's? If so, how will these wastes be handled?
4. Page 6-11, Spectral Gamma Analysis System. Will five logging systems be sufficient to cover the very large area involved? Please justify the number of logging systems by showing the number of sites to be logged and the average time to log a site.
5. Page 6-24, Paragraph on B Plant. This paragraph is outdated.
6. Page 6-24, Paragraph 6.5.9. We believe that although the video inspection is useful, an ultrasonic examination will be required to satisfy the regulations.

If you have any questions about this letter, please call me at (206) 438-7558.

Sincerely,

  
Gary Anderson, P.E.  
Environmental Engineer 3  
Nuclear and Mixed Waste Management

GA:jr

cc: Dan Duncan, EPA  
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DOE-RL/CCC  
192-RPA-113  
No. 7.15