



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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December 20, 1995

Mr. Ami Sidpara
Tank Waste Remediation System Operations Manager
U.S. Department of Energy
P.O. Box 550
Richland, WA 99352



Dear Mr. Sidpara:

Re: Tank Integrity Assessment Requirements for Milestone M-32-04-T05

In June 1994, the U.S. Department of Energy (USDOE) submitted the "Tank Waste Remediation System Tank System Integrity Assessments Program Plan" (WHC-SD-WM-AP-017, Rev. 1) to the Washington State Department of Ecology (Ecology) in fulfillment of Milestone M-32-04-T05. The plan committed to performing ultrasonic testing (UT) on six tanks in FY95 and completing an integrity assessment of all 28 tanks by the second quarter of FY99. To date, UT has not been performed because of technical difficulties. However, Ecology expects USDOE to fulfill the requirements of an integrity assessment, including the funding of all integrity assessment work (including UT on at least six tanks) and the Tank Structural Integrity Panel. 37607

The Double Shell Tank (DST) System is subject to WAC 173-303-640(2), requiring an integrity assessment of existing RCRA tank systems by January 12, 1990. The integrity assessment should include a physical examination of the tanks, and the regulation requires the owner or operator to develop a schedule for conducting integrity assessments over the life of the system. WAC 173-303-040 defines a tank system as a "dangerous waste storage and treatment tank and its associated ancillary equipment and containment system." The definition and wording of WAC 173-303-640 clearly addresses individual tanks and, therefore, requires all 28 DSTs to undergo integrity assessment. Milestone M-32-04-T05 of the Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement or TPA) was drafted to correct this non-compliant situation and required USDOE submit a final plan for the completion of the DST Integrity Assessment by June 1994.

The plan submitted to Ecology in fulfillment of M-32-04-T05 provided a schedule to perform an integrity assessment of all 28 tanks. As part of the integrity assessment, the plan called for UT of six DSTs. After many discussions between Ecology and USDOE, it was agreed that initially, six DSTs will undergo UT testing. The results from these tests will be evaluated by an unbiased

Mr. Ami Sidpara
December 20, 1995
Page 2

panel of experts (Tank Structural Integrity Panel) in conjunction with Ecology personnel. Once these results have been evaluated, a plan will be formulated to assess the need for UT testing of the remaining 22 tanks. Ecology feels very strongly that continued funding for, and input from, this expert panel is vital to successfully evaluating the results of the initial UT tests.

Ecology is concerned that USDOE has already fallen behind schedule for UT testing and future funding for the Tank Structural Integrity Panel is being threatened. Failure by USDOE to follow the submitted plan will necessitate the return to the original intent of Milestone M-32-04-T05 and physical examination of all 28 DSTs. In addition, Ecology could be looking at enforcement actions as an option to correct this non-compliant situation.

Please call me at (509) 736-3038 by January 3, 1996, to set up a meeting to resolve these concerns.

Sincerely,



Laura Cusack
Tank Waste Remediation System Operations Team Leader
Nuclear Waste Program

LC:mf

cc: Jackson Kinzer, USDOE
Casey Ruud, USDOE
Kamal Bandyopadhyay, BNL
M-32-04 Administrative Record