



U.S. Department of Energy  
**Office of River Protection**

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

0066629

05-ED-064

AUG 31 2005

Mr. Michael A. Wilson, Program Manager  
Nuclear Waste Program  
State of Washington  
Department of Ecology  
3100 Port of Benton Blvd.  
Richland, Washington 99352

RECEIVED  
SEP 20 2005

EDMC

Dear Mr. Wilson:

SUBMITTAL OF HANFORD FACILITY RESOURCE CONSERVATION AND RECOVERY ACT (RCRA) PERMIT MODIFICATION NOTIFICATION FORM 24590-HLW-PCN-ENV-05-005

Reference: WA7890008967, "Dangerous Waste Portion of the Hanford Facility Resource Conservation and Recovery Act Permit for the Treatment, Storage, and Disposal of Dangerous Waste, Chapter 10 and Attachment 51, 'Waste Treatment and Immobilization Plant.'"

This letter transmits Hanford Facility RCRA Permit Modification Notification Form 24590-HLW-PCN-ENV-05-005 (Attachment 1) for the State of Washington, Department of Ecology (Ecology) review and approval. The form describes a requested Class<sup>1</sup> modification to the Reference. A Bechtel National, Inc. certification statement is provided in Attachment 2.

This modification adds notes to four permit piping and instrumentation diagrams in Appendix 10.2 of the Reference that enable construction to address construction interferences and still maintain compliance with pipe slope requirements. These changes were discussed with Ecology representatives on August 4, 2005. Comments have been incorporated into the form.

If you have any questions, please contact me, or your staff may contact Woody Russell, Environmental Division, (509) 373-5227.

Sincerely,

  
Roy J. Schepens  
Manager

ED:RWR

Attachments: (2)

cc: See page 2

Mr. Michael A. Wilson  
05-ED-064

-2-

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cc w/attachs:

B. G. Erlandson, BNI  
J. P. Henschel, BNI  
R. E. Lawrence, BNI  
J. Cox, CTUIR  
S. Harris, CTUIR  
B. Becker-Khaleel, Ecology  
K. Elsethagen, Ecology  
E. A. Fredenburg, Ecology  
S. A. Thompson, FHI  
G. Bohnee, NPT  
A. C. McKarns, RL  
R. Jim, YN  
Administrative Record  
Environmental Portal, LMSI

cc w/o attachs:

J. Markillie, BNI  
M. Anderson-Moore, Ecology  
L. Cusack, Ecology  
S. L. Dahl, Ecology  
G. P. Davis, Ecology  
J. Vanni, Ecology  
K. Niles, Oregon Energy

Attachment 1  
05-ED-064

Hanford Facility RCRA Permit Modification Notification  
Form 24590-HLW-PCN-ENV-05-005

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**Hanford Facility RCRA Permit Modification Notification Form**  
**Part III, Chapter 10 and Attachment 51**  
**Waste Treatment and Immobilization Plant**

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Page 2 of 2:     Hanford Facility RCRA Permit, Part III, Attachment 51, Appendix 10.2  
                  Revise P&IDs 24590-HLW-M6-RLD-P0015, Rev 0; 24590-HLW-M6-RLD-P0017, Rev 0;  
                  24590-HLW-M6-RLD-P20004, Rev 0; and 24590-HLW-M6-RLD-P20005, Rev 0 as noted

Submitted by Co-Operator:

*D. Klein*

D. Klein

8/22/05

Date

Reviewed by ORP Program Office:

*R. J. Schepens*

R. J. Schepens

8/31/05

Date

<b>Hanford Facility RCRA Permit Modification Notification Form</b>	
Unit: <b>Waste Treatment and Immobilization Plant</b>	Permit Part & Chapter: <b>Part III, Chapter 10 and Attachment 51</b>
<p><u>Description of Modification:</u> The purpose of this modification is to incorporate the following changes to the permit RLD P&amp;IDs identified below. These changes update these permit drawings to provide flexibility in addressing construction interferences while maintaining minimum slope requirements, and to otherwise make the permit drawings consistent with their corresponding source drawings.</p> <ul style="list-style-type: none"> <li>• <b>24590-HLW-M6-RLD-P0015, Rev. 0:</b> <ul style="list-style-type: none"> <li>○ Add the following note applicable to the drain piping from HFP-SUMP-00001: "The drain pipe is embedded to provide shielding from radiation. Slope the embedded pipe at 1:20 unless constrained by physical limitations. If constrained by physical limitations the slope may be reduced to 1:50".</li> <li>○ Add the following note: "The required batch sequences, permissives, interlocks, alarms and operator interface points are described in the software requirements specification for RLD radioactive liquid waste disposal system, 24590-HLW-RLD-T0001 (to be issued)."</li> <li>○ Add the following to note 25: "For radar installation see drawings 24590-WTP-J8-50-00001 and 24590-WTP-J8-50-00004, 'HLW Instrument Installation Detail Radar Pipe Antenna Sump Assembly.' Provide ½" clearance between bottom of level meter wave guide and sump base."</li> <li>○ Add the following note applicable to floor drain line from Melter 1 cave SBS vessel area to HOP-SUMP-00003: "Line to be sloped at 1:20 unless constrained by physical limitations. If physical limitations exist, the slope may be reduced to 1:50."</li> <li>○ The portion of this drawing depicting steam supply to ejectors for HCP-SUMP-00001, HOP-SUMP-00003, and RLD-SUMP-00001 downstream of the HPS/RLD interface is permit-affecting.</li> <li>○ All references and notes are considered permit-affecting, except those that relate to portions of the drawing in phantom.</li> </ul> </li> <li>• <b>24590-HLW-M6-RLD-P0017, Rev. 0:</b> <ul style="list-style-type: none"> <li>○ Add the following applicable to in-cave portion of line from Rm. H-017 to HOP-SUMP-00003: "Pipe is sloped at 1:20 unless constrained by physical limitations. If physical limitations exist, the slope is reduced to 1:80 for routing of pipe".</li> <li>○ Add the following to note 5: "Embedded pipe to be sloped at 1:20 unless constrained by physical limitations. If physical limitations exist, the slope may be reduced to 1:80."</li> <li>○ Add the following note: "The required batch sequences, permissives, interlocks, alarms and operator interface points are described in the software requirements specification for RLD radioactive liquid waste disposal system, 24590-HLW-RLD-T0001 (to be issued)."</li> <li>○ All references and notes are considered permit-affecting, except those that relate to portions of the drawing in phantom.</li> </ul> </li> </ul>	

<sup>1</sup> Class 1 modifications requiring prior Agency approval.

<sup>2</sup> This is only an advanced notification of an intended Class <sup>1</sup>, 2, or 3 modification, this should be followed with a formal modification request, and consequently implement the required Public Involvement processes when required.

- **24590-HLW-M6-RLD-P20004, Rev. 0:**
  - Add the following note, applicable to steam ejector discharge lines from HOP-SUMP-00008, drain line from HFP-SUMP-00004 to RLD-VSL-00008, and drain line from Melter 2 cave sloped catch area to HOP-SUMP-00008: "Line to be sloped at 1:20 unless constrained by physical limitations. If the physical limitations exist, the slope may be reduced to 1:50".
  - Add the following note: "The required batch sequences, permissives, interlocks, alarms and operator interface points are described in the software requirements specification for RLD radioactive liquid waste disposal system, 24590-HLW-RLD-T0001 (to be issued)."
  - Add the following to note 3: "Ejector is seismic category III and commercial grade."
  - Add the following to note 17: "For radar installation see drawings 24590-WTP-J8-50-00001 and 24590-HLW-J8-50-00004."
  - Add the following note, applicable to the drain line from HFP-SUMP-00004 to RLD-VSL-00008: This line is seismic category II and commercial grade based on "seismic II over seismic I" routing."
  - Add the following note: "All piping and components are quality level CM and seismic category III unless otherwise noted."
  - Add the following note: "Joggled penetrations are quality level 1 and seismic category I."
  - The portion of this drawing depicting steam supply to ejectors for HOP-SUMP-00008 downstream of the HPS/RLD interface is permit-affecting.
  - All references and notes are considered permit-affecting, except those that relate to portions of the drawing in phantom.
  
- **24590-HLW-M6-RLD-P20005, Rev. 0:**
  - Add the following note, applicable to the embedded portion of the drain line from melter 2 cave sloped catch area to HOP-SUMP-00008: "The drain pipe is embedded to provide shielding from radiation. Slope the embedded pipe at 1:20 unless constrained by physical limitations. If constrained by physical limitations the slope may be reduced to 1:50".
  - Add the following note: "The required batch sequences, permissives, interlocks, alarms and operator interface points are described in the software requirements specification for RLD radioactive liquid waste disposal system, 24590-HLW-RLD-T0001 (to be issued)."
  - Add the following note: "Joggled penetrations and wall modules including internal piping are quality level 1 and seismic category I. Bulkhead structures are quality level 2 and seismic category II. Service piping within the bulkhead is commercial grade and seismic category III."
  - Add the following to note 17: "For radar installation see drawings 24590-WTP-J8-50-00001 and 24590-HLW-J8-50-00004, HLW Instrument Installation Detail Radar Pipe Antenna Sump Assembly. Provide ½" clearance between bottom of level meter wave guide and sump base."
  - Add the following note: "All pipe lines and piping components on this drawing are seismic category III and commercial grade unless otherwise noted."
  - The portion of this drawing depicting steam supply to ejectors for HSH-SUMP-00007 and HFP-SUMP-00005 downstream of the HPS/RLD interface is permit-affecting.
  - All references and notes are considered permit-affecting, except those that relate to portions of the drawing in phantom.

WAC 173-303-830 Modification Class: <sup>1 2</sup>	Class 1	Class <sup>1</sup> 1	Class 2	Class 3
Please mark the Modification Class:		X		
Enter Relevant WAC 173-303-830, Appendix I Modification citation number:		N/A		
Enter wording of WAC 173-303-830, Appendix I Modification citation:		N/A		
In accordance with WAC 173-303-830(4)(d)(i), this modification notification is requested to be reviewed and approved as a Class <sup>1</sup> 1 modification. WAC 173-303-830(4)(d)(ii)(A) states, "Class 1 modifications apply to minor changes that keep the permit current with routine changes to facility or its operation. These changes do not substantially alter the permit conditions or reduce the capacity of the facility to protect human health or the environment. In the case of Class 1 modifications, the director may require prior approval."				
Modification Approved: <input type="checkbox"/> Yes <input type="checkbox"/> No (state reason for denial)		Reviewed by Ecology:		
Reason for denial:				
		S. Dahl		Date

Attachment 2  
05-ED-064

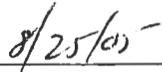
Bechtel National, Inc. Certification Statement

## Bechtel National, Inc. Certification

The following certification statement is provided consistent with Contract No. DE-AC27-01RV14136, Section H.26, Environmental Permits, paragraph (g) for the submittal of Hanford Facility Resource Conservation and Recovery Act Permit Modification Notification Form 24590-HLW-PCN-ENV-05-005.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

  
\_\_\_\_\_  
J. P. Herschel  
Project Director

  
\_\_\_\_\_  
Date