



Department of Energy

Richland Operations Office
P.O. Box 550
Richland, Washington 99352

NOV 21 1994

95-PCA-069

Mr. David L. Lundstrom
Section Manager
200 Area
Nuclear Waste Program
Washington State
Department of Ecology
1314 West 4th Avenue
Kennewick, Washington 99336

Dear Mr. Lundstrom:

RESPONSE TO OCTOBER 18, 1994, LETTER ON THE 204-AR WASTE TRANSFER FACILITY INSPECTION

Mr. Robert Wilson of your staff identified corrective actions to remedy noncompliances at the 204-AR Waste Transfer Facility. TWRS Plant had identified the noncompliances and were in the process of identifying corrective actions at the time of the inspection. Those corrective actions noted in the informal compliance letter "204-AR Waste Transfer Facility Compliance with Resource Conservation and Recovery Act and Washington Administrative Code (WAC) Chapter 173-303," dated October 18, 1994, are listed below and followed by the Hanford response.

Corrective Action #1

"...identify the primary emergency authority responsible for responding to leaks and/or spills from railcars or tank truck trailers arriving at 204-AR. The contingency plan for 204-AR must be revised as necessary to include the name and telephone number of the primary emergency authority responsible for responding to leaks and/or spills discovered at 204-AR."

Response:

The Tank Farms Building Emergency Plan (BEP), section 7.8.3, specifies the emergency response authority for railroad tanker car shipments outside 204-AR as follows:

"A radioactive material release from a railroad tanker car, between the shipping location (such as 340 building in the 300 area) and TC-4 (railroad tanker car storage area for 204-AR), is the responsibility of the Hanford Fire Department's Hazardous Materials team, and the site emergency response organization. A tanker car release at TC-4 up to 204-AR Facility is the responsibility of Tank Farms Operations (and specifically 204-AR personnel)."

204-AR personnel will use the Tank Farms Emergency Response Guide, "N - Hazardous Material Release/Spill to the Environment," which is an implementing procedure for the Tank Farms BEP, to respond to leaks and/or



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spills from railcars and tanker trucks at 204-AR. The response guide is available at the facility and all facility personnel have been trained on use of this procedure.

The job titles and work telephone numbers of the primary emergency responders are identified in section 14.0 of the revised Tank Farms Building Emergency Plan.

Corrective Action #2

"...revise, as necessary, the contingency plan for 204-AR to satisfy all requirements of the Washington Administrative Code (WAC), Section 173-303-350."

Response:

The revised Tank Farms BEP was issued for review on September 30, 1994, and will be issued for field use by November 30, 1994. A copy of the Tank Farm BEP will be maintained at 204-AR. The BEP includes:

- Section 14.0 includes the job title and work telephone number of the primary emergency authority responsible for responding to leaks and/or spills discovered at 204-AR;
- Section 14.0 includes the job title and work telephone number of the Emergency Coordinator and his alternates;
- Sections 7.7.4 and 7.8.3 describe actions to be taken in the event of receipt of damaged or unacceptable shipments and railroad tanker car spill/release outside 204-AR facility;
- Section 10.0 includes the list of emergency equipment;
- The cover page describes how the plan will be reviewed and updated; and
- Section 10.0 describes the locations of emergency communication devices.

Corrective Action #3

"...include limits in the transfer procedures for rail and tank truck dangerous waste transfers at 204-AR that, if exceeded, would require that rags, absorbent materials, and solid wastes resulting from transfer activities undergo dangerous waste designation determination per WAC 173-303-070. The 204-AR facility must be maintained to manage these materials as dangerous waste should they designate."

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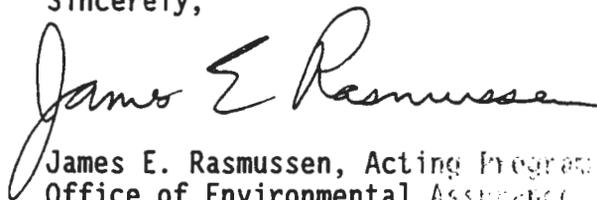
Response:

The procedures for unloading railroad tank cars and tanker trucks at 204-AR reference the procedure for segregating and packaging radioactive waste. This procedure defines the criteria for designating waste as mixed waste. All rags and debris generated during waste transfer operations which are wet will be considered tank-contacted waste and will be managed as mixed waste. Rags and debris which are not wet will be managed as low-level waste. 204-AR personnel have been trained on proper waste segregation practices. A satellite accumulation area has been set up in 204-AR to collect tank-contacted mixed waste generated during transfer activities.

TWRS Plant personnel are addressing the concerns regarding the training plan and annual reports, and are available to discuss these with you at your convenience.

Should you have any questions on these responses, please contact Mr. C. O. Ruud at 373-3478, or Mr. F. R. Miera at 373-7589.

Sincerely,



James E. Rasmussen, Acting Program Manager
Office of Environmental Assessment,
Permits, and Policy

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Subject: RESPONSE TO OCTOBER 18, 1994, THE 204-AR WASTE TRANSFER FACILITY INSPECTION

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