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OUTGOING TR. NO.	
29791 R2	
INCOMING CTR. NO.	
ACTION	
REPLY DUE	
DIST:	
Ash, E.B.	
Burke, D.C.	
Buller, M.	
Carnes, A.V.	
Carey, J.M.	
Crowder, A.C.	XI
Dechman, J.L.	
DiPal, C.V.	XX
Donnan, J.W.	
Gimero, R.J.	
Green, R.S.	XX
Heineman, R.E.	
Knight, B.E.	
Larson, M.P.	
Lorenzini, P.G.	X
McDermott, R.J.	
Patterson, J.W.	XX
Perkins, J.D.	
Pomeroy, R.D.	XX
Russell, A.L.	
Roscher, J.H.	XX
KE Plummer	XX
C. Yenger	XX
JR Toring	XX
Contract Administrator	X
Central Files	X
F. Albaugh	XX
J. Heine	XX
L. Pomeroy	XX
R. Green	XX
J. Shirley	XX
E. Torgney	XX
C. E. Felt	XX
T. Decker	XX
H. Ellis	XX
E. Fox	XX
G. Harlow	XX
A. Stordeur	XX
P. Hutchinson	XX
A. Kaldor	XX
R. Rainey	XX
R. Gadd	XX

Rockwell Hanford Operations
P.O. Box 800
Richland, WA 99352



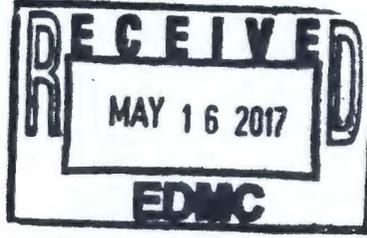
Rockwell International

March 14, 1986

In reply, refer to letter 29791,R2

Mr. R. E. Gerton, Director
Environment, Safety and Health Division

Mr. J. D. White, Director
Waste Management Division
Department of Energy
Richland Operations Office
Richland, Washington 99352



Gentlemen:

RESPONSE TO COMPLIANCE ORDER DE-85-677
(Contract DE-AC06-77RLO1030)

References: (a) Letter, February 6, 1986, R. E. Gerton to General Manager, Rockwell Hanford Operations, "Compliance Order No. De-85-677"

(b) Letter, February 19, 1986, J. F. Albaugh and W. F. Heine to R. E. Gerton and J. D. White. "Response to Compliance Order No. DE-85-677"

Reference (a) notified Rockwell Hanford Operations (Rockwell) of Compliance Order No. DE-85-677, issued by the Washington State Department of Ecology, regarding specific action for the Plutonium and Uranium Extraction (PUREX) facility to enhance its environmental safety. The order directed the: 1) installation of high level alarms in aqueous makeup (AMU) tanks and a pH meter in the chemical sewer, 2) implementation of procedural changes and waste management methods, and 3) the submittal of a report identifying engineering options and implementation plans to preclude releases of waste chemicals to the chemical sewer. Reference (b) reported the status of actions already initiated with regard to these issues and agreed to provide information for the requested report by March 15, 1986. The attachment to this letter indicates documentation of administrative actions taken to preclude the intentional discharge of hazardous substances to the chemical sewer. Rockwell will informally review other proposed actions with your staffs on Monday, March 17, 1986. The decisions reached at this meeting will be formally documented by Rockwell and transmitted to you subsequent to the meeting.

Rockwell is also finalizing a chemical sewer management plan which provides definitive guidance and defines responsibilities for the prevention, monitoring and reporting of chemical discharges to the chemical sewer. It provides directions for evaluating the potential for reuse of out-of-specification chemicals or their designation as waste, elementary neutralization requirements and disposal methods and options. This plan will be provided to the Department of Energy - Richland Operations Office (DOE-RL).

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Mr. R. E. Gerton
Mr. J. D. White
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Upon receipt of the subject order, Rockwell extended the scope and duration of an ongoing engineering study to encompass additional areas which can potentially contribute to hazardous chemical releases to the chemical sewer. This study is now in final review and will be released in April, 1986.

Recommendations from this study address the AMU area as well as other related cold-chemical bulk storage and handling areas. However, plans for implementing these recommendations are dependent on the availability for funds, both expense and capital, and are undergoing careful development to expedite their completion and integration into our budget. Though numerous funding alternatives have been evaluated, the appropriate sources and availability of funds influenced our decisions in grouping the required work into several packages. With respect to the required General Plant project, B-649, "AMU Spill Containment", we believe an aggressive approach to project execution is warranted and can be accomplished within the framework of the existing Project Management System (RL5700.2a). The specific approach will require discussion and coordination with DOE-RL Construction Division (CON).

Should you require further information concerning this matter, please contact Mr. J. E. Toomey, on 373-2954.

Very truly yours,

J. F. Albaugh, Director
Safety and Quality Assurance

W. F. Heine, Program Manager
Environmental Control Programs

JFA/GCS/jaw

Att.

cc: R. W. Brown - DOE-RL
P. E. Rasmussen - DOE-RL
D. P. Simonson - DOE-RL

ATTACHMENT 1

PUREX PLANT OPERATING PROCEDURE CHANGES
RESTRICTING RELEASE OF REGULATED CHEMICALS

1. The following plant operating procedures (PO's) have been changed as noted. The PO-020-220, Safety section, is also provided for reference.

<u>PROCEDURE</u>	<u>CHANGE</u>
PO-120-006	Refer to PO-020-220, Safety section, Page 1
PO-120-009	Refer to PO-020-220, Safety section, Page 1
PO-120-014	Refer to PO-020-220, Safety section, Page 1 "Do not transfer heels to sewer ...", Safety section, Page 2; Caution, Page 4; Caution, Page 9
PO-120-015	Refer to PO-020-220, Safety section, Page 1 "Do not leave transfer area ..."; Safety section, Page 2
PO-120-016	Refer to PO-020-220 and "Do not transfer heels to sewer ...", Safety section, Page 2; "Do not transfer heels to sewer ...", Caution, Page 4 and Page 9
PO-120-017	Refer to PO-020-220, Safety section, Page 2
PO-120-018	Caution, "Do not leave AMU area during transfers ...", Pages 2 and 3
PO-120-019	Caution, "Do not leave AMU area during transfers, Page 2 and Page 5
PO-120-029	Refer to PO-020-220, Safety section, Page 1
PO-180-012	Refer to PO-020-220 and "Do not leave AMU area ...", Safety section, Page 1
PO-180-020	Refer to PO-020-220, Safety section, Page 1 and Pages 6 and 7
PO-180-021	Refer to PO-020-220, Safety section, Page 1

ATTACHMENT 1

PUREX PLANT OPERATING PROCEDURES CHANGES
RESTRICTING RELEASE OF REGULATED CHEMICALS

SAFETY SECTION, PO-020-220, A-5, PDA PO-1044

SAFETY

The CERCLA/WDOE "Hazardous Substance Release Report" serves only as a reporting system and does not authorize the release of hazardous substances (either above or below the reportable quantities).

Rags and paper towels should not be used to clean up spills unless absolutely necessary. If rags are used, they should be rinsed THOROUGHLY, dried and discarded in a metal waste container.

Criticality

Minimum Cd concentration is 5.85 wt% and H⁺ concentration is 4.15 wt%.

Caution

Planned discharges of any of the following substances are not permitted under any conditions:

- Cadmium nitrate ($\text{Cd}(\text{NO}_3)_2$) and all other cadmium compounds
- Tributyl phosphate (TBP)

Planned discharges of hazardous chemicals are not permitted under any conditions (PDA PO-1044).

Never transfer cadmium nitrate or TBP to the chemical sewer.

Applicable Safety Documents

Provisions of "General Regulations and Practices for Radiation Work (GEN-0)", apply to all work performed under this procedure. Refer to the "Chemical Safety Guide" for specific chemicals involved and to the Safety section of the applicable AMU makeup procedure.

ATTACHMENT 1

PUREX PLANT OPERATING PROCEDURES

RESTRICTING RELEASE OF REGULATED CHEMICALS

2. The following caution statement has been added to the following AMU and chemical handling procedures, effective March 12, 1986.

CAUTION

The tank liquid level must be constantly monitored during addition of any solution to avoid overflowing the tank to the chemical sewer.

Affected procedures (PO's):

120-002	120-029	180-101
120-003	120-130	180-110
120-004	120-150	180-120
120-005	120-190	180-121
120-006	120-210	180-122
120-007	120-230	180-150
120-008	120-250	
120-009	120-260	
120-013	120-400	
120-014	120-402	
120-015	120-600	
120-016	180-012	
120-017	180-020	
120-018	180-021	
120-019	180-060	
120-023	180-080	
120-025	180-090	
120-026	180-100	