



APR 19 2007

07-ESQ-048

CCN:141838

Ms. Jane Hedges, Program Manager
Nuclear Waste Program
Washington State
Department of Ecology
3100 Port of Benton Blvd.
Richland, Washington 99354

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APR 19 2007

EDMC

Dear Ms. Hedges:

PROPOSED TRANSITION PERIOD FOR IMPLEMENTING REVISED PROCESS FOR PERMIT INCORPORATION OF DESIGN DOCUMENTS AT THE WASTE TREATMENT AND IMMOBILIZATION PLANT (WTP)

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.'"

In January 2007, the U.S. Department of Energy, Office of River Protection (ORP) and Bechtel National, Inc. (BNI) submitted comments on the draft Dangerous Waste Permit (DWP) prepared by the Washington State Department of Ecology (Ecology) to incorporate the melter 2+2 configuration. The comment package included a proposed alternate condition regarding submittal of design documents for incorporation into the permit. This proposed condition identified an alternate process for incorporating the design into the permit, including submittal of source engineering drawings/documentation. Should Ecology agree with the revised approach, this letter provides a proposal for transitioning the permitting process from the current approach to one that implements the submittal of source design documents under the DWP (Reference).

ORP and BNI are requesting Ecology allow for a transition period to avoid potential impacts to WTP construction due to delays in the approval of Permit Change Notices (PCN) and permit design packages resulting from the implementation of a new BNI internal permitting process. As discussed with Ecology, this transition is expected to take approximately nine months, not to exceed one year after the issuance of the DWP incorporation of the melter 2+2 permit modification.

APR 19 2007

During the transition period, BNI will continue to submit packages and PCNs to ORP and Ecology using either the existing permitting process or the alternate approach. If the existing permitting process is used, the note added to permit drawings regarding portions of the drawing, shown in phantom will be modified to read "The portions of this drawing shown in phantom do not require Independent Qualified Registered Professional Engineer (IQRPE) assessments of design or installation inspections by a qualified installation inspector in accordance with the DWP and/or Washington Administrative Code (WAC) requirements, or identification in the project's Component Information System (CIS) as DWP affecting." Construction activities will proceed in accordance with approved permit documents and associated change documents (e.g., Design Change Notices, Specification Change Notices, Field Change Notices, Field Change Requests, and Supplier Deviation Disposition Requests) sent to Ecology per Permit Condition III.10.C.9.h. Construction of support systems (e.g., utilities) will continue as defined on engineering source drawings that are required by Ecology to be submitted in accordance with permit conditions.

ORP and BNI propose to include the following quoted text in their transmittal letters to Ecology:

"The BNI internal dangerous waste permitting process is being revised to reflect new requirements of the DWP. During this revision period, submittals to Ecology will be performed using the existing permitting process to identify components requiring IQRPE assessments of design or installation inspections by a qualified installation inspector in accordance with the DWP and/or WAC requirements."

Source General Arrangement (GA) drawings will be submitted to Ecology for approval during the transition period since GA drawings are not used for IQRPE assessments, installation inspections, or CIS identification of DWP affecting components. Therefore, the quoted text above will not be included in transmittal letters to Ecology that transmit GA drawings only. As discussed with Ecology staff, the source GA drawings will not have a Professional Engineer stamp.

ORP and BNI propose Ecology's approval letters include text to clarify the changes being approved such as:

"Ecology is approving only the design changes identified in the permittees' submittal. Decisions regarding the regulation of support systems (e.g., utilities) and instrumentation will be made at a later date. Only those components in direct contact with the waste or part of secondary containment require installation inspections or IQRPE reports."

The concept of the transitional period has been informally discussed between ORP, BNI, and Ecology staff as indicated in the March 7, 2007, Meeting Minutes (attached).

Ms. Jane Hedges
07-ESQ-048

-3-

APR 19 2007

If you have any questions, please contact Lori A. Huffman, Office of Environmental Safety and Quality, (509) 376-0104, or Brad G. Erlandson, BNI, (509) 371-3826.



Shirley J. Olinger, Acting Manager
Office of River Protection



W. S. Elkins, Project Director
Bechtel National, Inc.

ESQ:LAH

Attachment

cc w/attach:

C. M. Albert, BNI
J. M. Atwood, BNI
B. G. Erlandson, BNI
P. A. Fisher, BNI
D. A. Klein, BNI
L. T. Lamm, BNI
P. E. Peistrup, BNI
T. D. Semmens, BNI
B. Becker-Khaleel, Ecology
S. L. Dahl, Ecology
E. A. Fredenburg, Ecology
S. A. Thompson, FHI
A. C. McKarns, RL
Administrative Record (WTP H-0-8)
BNI Correspondence
Environmental Portal, LMSI

cc w/o attach:

C. E. Rogers, BNI

Attachment
07-ESQ-048

Meeting Minutes from B. G. Erlandson, BNI, "Alternate
DWP 2+2 Permit Condition for Design Submittals,"
CCN-150233, dated March 7, 2007.



CCN: 150233



Meeting Minutes

Group Chair: Brad Erlandson

Meeting 1: February 14, 2007; 11:30 - 12:30

Ecology Office, Columbia Room, 3C

Meeting 2: February 26, 2007

BNI Office, MPF, J-109

Subject: Alternate DWP 2+2 Permit Condition for Design Submittals

Prepared by: Brad Erlandson

Meeting 1: February 14, 2007

These meeting minutes provide a summary of ORP, BNI, and Ecology discussion concerning implementation of an alternate permit condition/process for submittal of WTP design information for Ecology approval and incorporation into the Dangerous Waste Permit. The meeting agenda provided an outline for these discussions and is included as attachment 1. The draft "Alternate" permit condition is included as attachment 2, and a high-level draft permitting process diagram is provided in attachment 3. Prior to starting the meeting Lori Huffman asked Brenda Becker-Khaleel to provide a status of specific 2+2 permit condition comments submitted by ORP/BNI. Brenda's feedback is provided in attachment 4.

Ecology comments on the proposed condition: Ecology was generally satisfied with the alternate permit condition language, but proposed three changes.

1. Bullet 2, "Certification by a registered professional engineer (i.e., stamping) in accordance with WAC 173-303-806(4)(a) is not required," is acceptable if the permittees are willing to modify permit condition III.10.C.9.g. (see below) to require PE certification of the final as-built drawings. . . Integrity Assessment reports for the design would continue to be prepared and stamped by an Independent Qualified Registered Professional Engineer (IQRPE). BNI will investigate Ecology's stamping recommendations with WTP Engineering.

III.10.C.9.g. Upon completion of the WTP Unit construction subject to this Permit, the Permittees shall produce as-built drawings of the project which incorporate the design and construction modifications resulting from all change documentation as well as modifications made pursuant to Permit Conditions III.10.C.2.e., III.10.C.2.f., and III.10.C.2.g. The Permittees shall place the as-built drawings into the operating record within twelve (12) months of completing construction.

Ecology also questioned whether the documentation submitted by the Permittees, certifying that WTP has been constructed in compliance with the Permit condition III.10.C.2.a (see below), would be stamped by

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CCN: 150233

the Registered Professional Engineer. BNI responded that they were having internal discussions on what would be provided to satisfy that permit condition.

III.10.C.2.a. The Permittees may not commence treatment or storage of dangerous waste or mixed waste in any new or modified portion of the facility until the Permittees have received a Permit modification approval pursuant to Permit Conditions III.10.C.2.e. and III.10.C.2.f., or III.10.C.2.g., and submitted to Ecology, by certified mail, express mail, or hand delivery, a letter signed by the Permittees and a Registered Professional Engineer stating that the facility has been constructed or modified in compliance with the Permit in accordance with WAC 173-303-810(14)(a); and

- i. Ecology has inspected the modified or newly constructed facility and finds it is in compliance with the conditions of the Permit, or
 - ii. Ecology has either waived the inspection or has not, within fifteen business days, after receipt of the Permittees' letter, notified the Permittees of an intent to inspect.
2. Bullet 5, because the agency and the permittees do not have a shared understanding of the phrase, "non-waste management operations," Ecology proposes to better define non-waste management operations in the permit. Ecology sees three categories of components/instruments: (1) those that directly affect waste handling and will be included in permit tables defining operating ranges, inspection, or other requirements; (2) those that are clearly of no consequence to waste management that will be excluded from permit tables; and (3) those components that are in a gray area (e.g., steam supply to an ejector used to remove waste from a sump). BNI and ORP commented that describing these components/processes in chapter 4 of the DWP should be sufficient. Ecology does not want to exclude the possibility that some small number of these support system components may be included in permit tables or specifically addressed in permit conditions. Ecology suggested that the permit requirements relating to calibration, inspection, and maintenance of those components/processes described in Chapter 4 and not in the inspection tables would be at a higher level (i.e., more generic) than what will be required in the existing, yet unpopulated permit tables. Lori Huffman pointed out that the process descriptions in chapter 4 of the permit are enforceable and the permit must be modified if processes change.
3. Ecology proposes to delete bullet 8 believing it is redundant with bullet 7 (e.g., once permit inspection tables have been populated per bullet 7, there is no need for a condition indicating which items do not require inspection). There was general agreement on this point.

Review of Permitting Process Diagram: Brad Erlandson presented a draft permitting process diagram and discussed how permit modifications could be made using source drawings. The following key points were discussed by meeting participants:

- Source documents (e.g., drawings, mechanical data sheets, specifications) would be submitted to ORP/Ecology without being PE stamped. Drawings would not be

CCN: 150233

bolded or ghosted satisfying Ecology's objective of maintaining configuration control in the permit of both waste management and support systems. Unique permit documents (e.g., flooding volume, leak detection, hydrogen generation, etc.) still will be used where there isn't a single source engineering document. These documents would not be PE stamped, but review and issuance of these documents would otherwise be unchanged.

- DOE and Ecology comments on an issued design document (e.g., drawing) would be dispositioned with the commenter, and as appropriate, a formal action tracking item (ATS) or a design change document (e.g., drawing change notice (DCN)) would be issued to resolve the comment and/or incorporate the comment into the design. If a design change were required, the document or drawing would be reissued in accordance with engineering procedures (e.g., after 10 DCNs accumulate).
- Approved design change documents that have not been incorporated into the engineering document will be included in the permit package or PCN for information, but would not be incorporated into the permit. As permit documents are revised in accordance with BNI's internal processes (e.g., after 10 DCNs accumulate for a drawing), a PCN incorporating the updated permit document would be submitted.
- WTP would continue to submit approved design change documents (e.g., DCN, SCNs, FCRs, etc.) and non-conformance reports electronically to Ecology in the weekly "milk-run" in accordance with existing permit conditions and Ecology would identify any changes requiring permit modifications. The Permittees will continue to alert Ecology to any such change documents that are considered important enough to require a record of Ecology's concurrence or disapproval prior to construction or installation.
- Construction would progress in accordance with the approved drawing in the permit and the design changes provided to Ecology.
- Following revision and issuance of an engineering drawing it would be resubmitted to ORP and Ecology with a Permit Change Notice (PCN). DCN's associated with a drawing can be identified in DOC Search. Don Sommer does these searches routinely and offered to demonstrate for anyone who is interested. Don indicated search results can be pasted into an Excel spread sheet for easier sorting. Lori Huffman suggested it might not be necessary to resubmit every drawing each time it is revised for incorporation into the permit. Ecology did not agree with this, each document should be submitted for incorporation into the permit as it is revised by the Permittee.

Potential Issues and Solutions to Revised Process: No longer bolding drawings will require changes to WTP processes. Bolded drawings are currently used to identify permitted equipment in CIS and are routinely used by project and field engineering to determine if potential changes (DCNs, FCRs, CDRs and SDDR) impact permitted equipment and systems. Permit P&IDs and CIS are used by the IQRPE and Independent Tank/MTU Installation Inspectors to identify permitted equipment including piping and in-line components, which may not be identified in the permit tables. In addition, CIS

CCN: 150233

will be used to populate other databases for control of instrumentation and conduct of equipment maintenance.

Group discussion suggested it might be best to initially populate CIS with those components directly managing waste. Then, populate CIS with other instrumentation and support system (utility) components, in parallel with permit tables.

Configuration control of the permitted components in each critical system would be maintained on P&IDs in the permit. Specific requirements for regulated components on these drawings would be addressed in permit tables and associated text [e.g., Chapter 6, Procedures to Prevent Hazards (inspection plans) and the associated inspection schedules (Chapter 6, Appendix 6A)], in a permit condition, or through descriptive text in Chapter 4. Chapter 4, Process Description would be used to describe processes, including specific components of interest to Ecology, where there isn't a need to identify specific parameters such as operating ranges, automatic cutoffs, or inspection schedules. Lori Huffman indicated that once "as-built" drawings are placed in the operating record other Hanford RCRA permits contain a list of drawings in the permit for reference.

Avoiding Impacts to WTP Design and Construction: Brad Erlandson explained the need for BNI, ORP and Ecology to approve WTP design pending permit issuance and development of a new permitting process. Based on the permit being issued in March or April; time required to obtain an approved trend to fund modification of the WTP permitting and engineering processes; and the time required to implement process changes; it is likely that Permit Change Notices and Permit design packages could be delayed until late summer or early fall which would impact construction. Some LAW permit packages are expected to be ready for processing in April 2007 and a number of permit change notices are already on hold.

Discussion centered on continuing to supply bolded drawings, which would continue to support IQRPE assessments, installation inspections, and DWP component identification in CIS, until the 2+2 final permit is issued and a revised process can be established. ORP and BNI would recognize in their transmittal letters that the process is being revised and that bolding is for the purposes described above. If Ecology' approved the PCN the letter would make clear that the agency was only approving the design changes identified on the PCN, and decisions regarding support systems (utilities) and instrumentation will be made once the new permitting process is in place.

Julie Atwood suggested the need for a disciplined process to assure changes to permitting processes are fully developed and agreed to by all parties before being implemented. Pete Furlong asked if Ecology would be willing to establish a transition period for implementation of the new permit condition. Pete Furlong suggested a 9-month transition period.

Brenda Becker-Khaleel indicated she would have to discuss the proposal with Ecology management and that any Ecology approvals would contain strong caveats.

Julie Atwood also mentioned the importance of having time to provide the draft responsiveness summary to ORP, BNI, and Ecology management prior to the responsiveness summary being released to the public to assure there are no surprises and

CCN: 150233

to allow for management discussion if appropriate. Ecology indicated a draft responsiveness summary will be made available prior to being released to the public, but emphasized Ecology would be primarily interested in any comments related to the technical accuracy of the document and that the agency can not negotiate the content of their response to comments.

Actions:

- Erlandson to provide Ecology with a word version of attachment 2 to ORP/BNI comments on draft 2+2 permit (complete).
- Erlandson to discuss PE stamping of as built drawings/with engineering management in lieu of stamping each permit drawing or document (complete).
- Erlandson to provide feedback on the permittee's plans regarding documentation that would be submitted at the end of the project to certify that WTP had been constructed in accordance with permit requirements.
- Erlandson to develop draft letter/proposal regarding transition period for implementation of revised permit conditions (complete).
- Becker-Khaleel to discuss approval of PCNs and permit packages during transition period with Ecology management (complete).
- Becker-Khaleel to draft definition regarding "non-waste management operations."
- Huffman to discuss Risk Budget Tool with CH2M Hill and suggest alternate language for IDF permit condition (complete).

Meeting 2: February 26, 2007

This meeting provided an opportunity to follow up and clarify discussions and action items from the February 14, 2007 meeting.

Brenda Becker-Khaleel reviewed Ecology's schedule for permit issuance. Key dates include:

- March 8: Ecology Internal/Legal review of Responsiveness Summary
- March 16: Draft Responsiveness Summary complete
- March 19: Share Responsiveness Summary with permittees
- March 26: Permittees provide feed back to Ecology as appropriate
- April 2: Ecology does final permit assembly
- April 15: Ecology issues Responsiveness Summary/permit

Ecology reiterated that the agency is primarily interested in comments related to the technical accuracy of the Responsiveness Summary and that the agency can not negotiate the content of their response to comments.

Lori Huffman, ORP, indicated she had talked to CH2M HILL regarding the risk budget tool that will be used to evaluate risk at the Integrated Disposal Facility (IDF). CH2M HILL said they would not be allocating specific risk limits to individual waste generators. Instead, they will

CCN: 150233

perform an integrated risk analysis to identify specific constituents of concern and then address issues with individual waste generators as appropriate. ORP believes the WTP's obligation is to meet IDF waste acceptance criteria and is concerned that it is unclear how Ecology expects the project to participate in IDF risk modeling. Ecology expressed their concern that if WTP made "bad glass" that it could use up a greater portion of the available risk allowance at IDF than intended, or that there would be glass containers without a disposal path.

On the subject of stamping as-built drawings, Ecology clarified that the February 14th meeting minutes should reflect stamping of as-built drawings, or a report specific to as-built drawings (III.10.C.9.g.), but not the letter from a professional engineer used to document that the facility has been constructed in accordance with the permit (III.10.C.2.a.). Brad Erlandson indicated he had a meeting scheduled with Steve Lynch to discuss stamping and would report back to the group on this subject.

Discussion continued regarding how to manage transition from the existing permitting process to one in which engineering source drawings are provided to Ecology. A draft schedule for transition, from BNI's perspective, was presented and discussed (Attachment 5). The BNI schedule described the time required to resolve specific permitting issues, trending new scope and budget, revising internal procedures, obtaining approvals, and training staff on the revised process. The timeline for these activities totaled approximately 9 months.

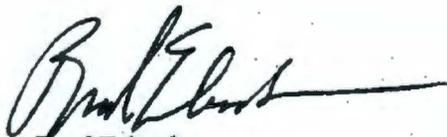
Ecology suggested another way to look at the existing and revised process would be to continue using the existing process for any permit changes shown in the package and PCN database reports at the time the permit is issued, and then use the new process for any packages or PCNs from that point forward. It was discussed that the database already includes all remaining permit packages, but that Permit Change Notices (PCNs) are harder to predict. Ecology indicated they could leave some room for the permittees to request critical PCNs be processed under the old requirements, but that they wanted to define an end point for the transition. Continued use of the existing process would include specific caveats as discussed in prior meeting.

BNI indicated that Travis Semmens had drafted a transition proposal in letter format. Pete Furlong indicated he had reviewed the proposal and asked that references to bolding and ghosting drawings be deleted and that the proposal simply refer to the existing permitting process. Brad Erlandson said BNI would incorporate ORP's comments and send the draft proposal to Ecology and ORP for review.

- BNI asked Ecology about managing construction of utilities (e.g., steam and water) now that drawings will not differentiate between waste management and support systems. BNI asked if they could continue installing utilities in accordance with source drawings, even if the drawing was not yet included in the permit. Ecology responded that utilities could continue to be installed. Ecology expressed interest in components like ejectors that are required for waste removal. BNI indicated that components like ejectors would be part of a tank package and the design would be approved by Ecology prior to installation. Ecology reiterated that they may draft specific permit conditions related to the required functionality of support systems.

CCN: 150233

Construction of other systems would progress in accordance with the approved drawing in the permit and the design changes provided to Ecology.



Brad Erlandson
March 7, 2007.

BGE/paf

Distribution (Attendees have a ¹ for meeting one and a ² for meeting 2)

| | | | |
|--------------------------------------|--------|-------------------------------|--------|
| Atwood, J. M. ^{1,2} | MS4-E2 | Hill, J. S. ¹ | MS4-D2 |
| Becker-Khaleel, B. L. ^{1,2} | H0-57 | Huffman, L. A. ^{1,2} | H6-60 |
| Brown, J. F. ¹ | MS4-D2 | Peistrup, P. E. ¹ | MS4-D2 |
| Dubiel, B. ¹ | MS4-D2 | Robertson, D. C. ¹ | MS4-D2 |
| Erlandson, B. G. ^{1,2} | MS4-D2 | Semmens, T. D. ² | MS4-D2 |
| Fredenburg, E. ¹ | H0-57 | Sommer, D. ¹ | H6-60 |
| Furlong, P. T. ^{1,2} | H6-60 | Williams, Tanya. ¹ | H0-57 |
| PDC | MS9-A | | |

CCN: 150233

Attachment 1: DWP - Alternate Permit Condition for Design Submittals



River Protection Project
 Waste Treatment Plant
 2435 Stevens Center Place
 Richland, WA 99354
 Tel: 509 371 2000

DWP - Alternate permit condition for design submittals

Agenda

Date: 2/14/07

Time: 11:30 - 12:30

Location: Ecology Office, Conf. Rm. 3C, Columbia River

Group Chair/Prepared By: Brad Erickson

Goals/Objectives: Discuss alternate permit condition and implementation strategies

| | Agenda Item/Issue | Allocated Time |
|----|--|----------------|
| 1. | Safety | 5 mins |
| 2. | Review Permit Condition <ul style="list-style-type: none"> • Ecology comments/proposed changes? | 10 mins |
| 3. | Implementation of alternate permit condition <ul style="list-style-type: none"> • Review Draft Process Flow Diagram <ul style="list-style-type: none"> ○ Defining the review process ○ Responding to comments ○ Certifications and Approvals • Identify potential issues and solutions <ul style="list-style-type: none"> ○ Understanding the permitted design ○ Distinguishing between components requiring configuration control and installation inspection, integrity assessments, inspection, and maintenance ○ Instrumentation • Does the permit require other modifications? | 25 mins |
| 4. | Avoiding impacts to WTP design and construction <ul style="list-style-type: none"> • Schedule for implementation of revised permit condition • Options for processing permit modifications in the interim <ul style="list-style-type: none"> ○ Stop work - wait for permit/procedure revisions to resume work ○ Caveat Ecology approvals ○ Caveat permit submittals | 15 |
| 5. | Conclusions/Action Items | 5 |

CCN: 150233

Attachment 2: Final Comment Alternate Source Document Approach



HANFORD TANK WASTE
TREATMENT AND
IMMOBILIZATION PLANT
(WTP)

HAZARDOUS WASTE PERMIT
DRAFT 2+2 PERMIT MODIFICATION
WTP COMMENTS

ALTERNATE

TOPIC: ALTERNATE CONDITION REGARDING SUBMITTAL OF DESIGN DOCUMENTS FOR INCORPORATION INTO THE PERMIT

ALTERNATE (3): The following comment is proposed for discussion with Ecology as an alternate comment regarding submittal of design documents for incorporation into the permit:

Requirements in the compliance schedule (III.10.E.9.b.i, III.10.E.9.c.ii, III.10.E.9.d.ii, III.10.F.7.c.i, III.10.G.10.b.ii, III.10.G.10.c.ii, III.10.G.10.d.ii, III.10.H.5.b.ii, III.10.H.5.c.ii, III.10.H.5.d.ii, III.10.J.5.b.ii, III.10.J.5.c.ii, III.10.J.5.d.ii) require submittal of engineering documentation for incorporation into the Permit. When required by these permit conditions, source design drawings, mechanical data sheets, material selection data sheets, and specifications shall be submitted and will have the following characteristics:

- Certified in accordance with WAC 173-303-810(13).
- Certification by a registered professional engineer (i.e., stamping) in accordance with WAC 173-303-810(4)(e) is not required.
- Systems, structures, and components in contact with dangerous waste or providing secondary containment functions require structural integrity assessments (QRPE reports) in accordance with Permit Conditions III.10.E.9.b.i, III.10.E.9.c.i, III.10.E.9.d.i, III.10.G.10.b.i, III.10.G.10.c.i, III.10.G.10.d.i, III.10.H.5.b.i, III.10.H.5.c.i, III.10.H.5.d.i, III.10.J.5.b.i, III.10.J.5.c.i, III.10.J.5.d.i, and WAC 173-303-640(3)(e).
 - Permit items requiring structural integrity assessments (QRPE reports) are identified in Permit Tables III.10.E.A, III.10.E.B, III.10.E.C, III.10.E.D, III.10.G.A, III.10.G.A.i, III.10.H.A, III.10.I.A, III.10.J.A, and III.10.K.A.
- Systems, structures, and components in contact with dangerous waste or providing secondary containment functions require installation inspections in accordance with Permit Conditions III.10.E.3.a, III.10.G.3.a, III.10.H.1.a.x, III.10.J.1.a.x, and WAC 173-303-640(3)(e).
 - Permit items requiring installation inspection are identified in Permit Tables III.10.E.A, III.10.E.B, III.10.E.C, III.10.E.D, III.10.G.A, III.10.G.A.i, III.10.H.A, III.10.I.A, III.10.J.A, and III.10.K.A.
- Permitted instruments are identified in Permit Tables III.10.E.E, III.10.E.F, III.10.E.G, III.10.E.H, III.10.G.C, III.10.H.C, III.10.I.C, III.10.J.C, and III.10.K.C. Process monitors and instruments for non-waste management operations (e.g., utilities, raw chemical storage, non-contact cooling waters, etc.) are excluded from these tables in accordance with Permit Conditions III.10.E.9.c.ii, III.10.J.5.a.x, III.10.H.5.a.x,
- Any change document prepared for these source design documents will be supplied to Ecology in accordance with Permit Condition III.10.C.9.b.

6-Mar-07

Page 1 of 2

CCN: 150233

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- Plant items associated with directly managing waste and requiring periodic inspection are identified in the inspection schedule of Attachment 51, Chapter 6.0 of this Permit in accordance with Permit Condition III.10.C.5.o.
 - Inspection and maintenance of utility systems, support systems, and mechanical handling systems not in direct contact with dangerous waste is at the discretion of the Permittee. Functionality of utility and support systems depicted in these source design documents is required in accordance with Permit Condition I.B.7 and WAC 173-303-810(6).

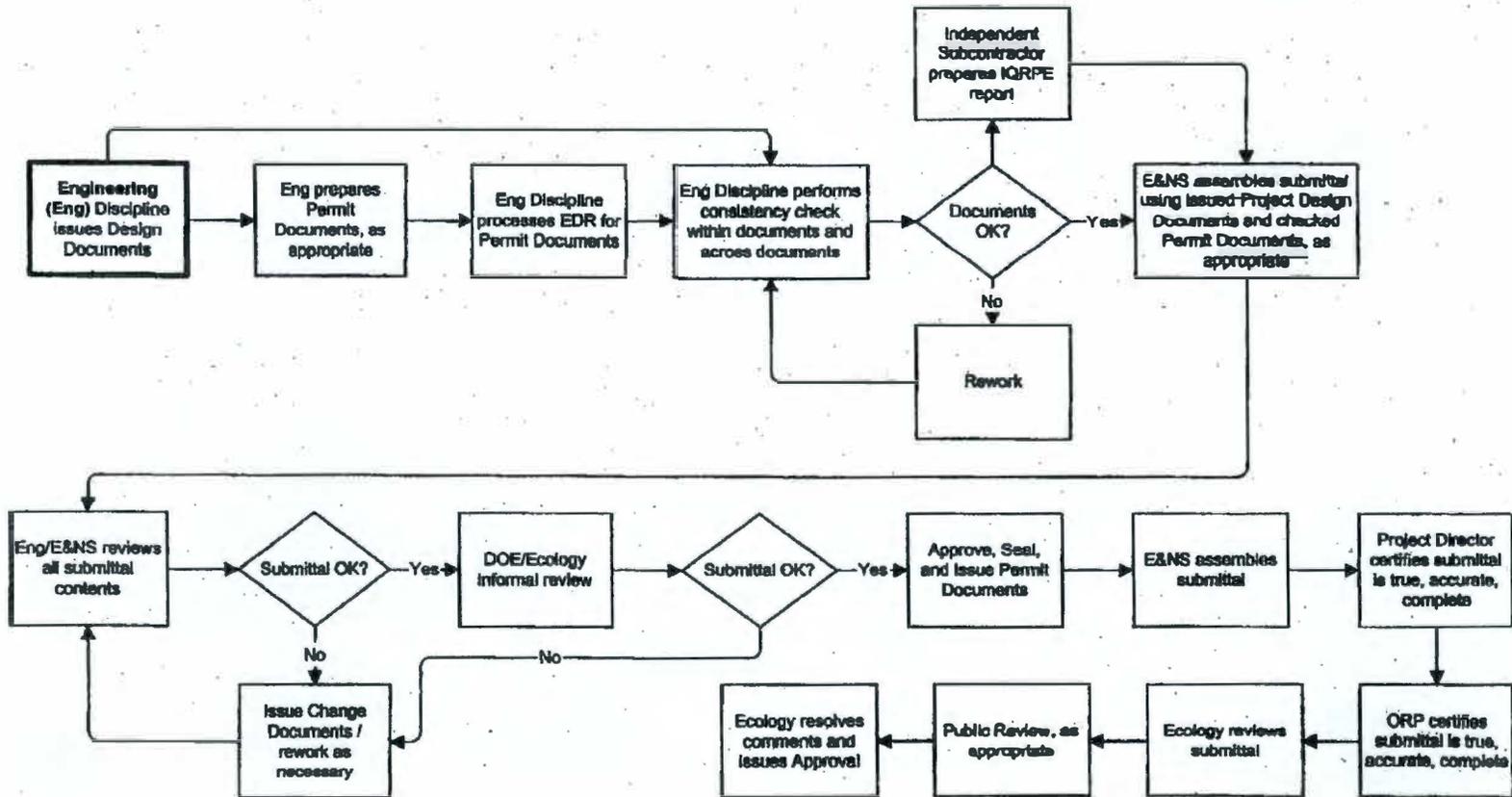
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Page 2 of 2

CCN: 150233

Attachment 3: DWP Engineering Docs Flow Sheet

Preparation, Review, and Approval of Documents Submitted to the Dangerous Waste Permit



CCN: 150233

Attachment 4: Ecology Status re: 2+2 Comments

HLW Instrument Table: Ecology accepts WTP comments on the table, with one exception; Ecology still plans to include the infrared canister level detector in the table. Ecology will also expect the permittees to incorporate discussion of some of the other instruments (e.g., delta temperature for melter cooling water) into chapter 4 if not already provided. Instruments will continue to be a topic of discussion until a better understanding of process operations is available.

Third LAW melter: Ecology accepts the alternate permit condition proposed by ORP, but will incorporate the details regarding "maintaining the capability to install the third melter" into the Responsiveness Summary instead of the permit condition. Ecology will make editorial changes as described at prior meetings. [REDACTED]

Mechanical Handling: [REDACTED]

Integrated Disposal Facility (IDF): Brenda clarified that this condition is intended to say that, IDF will use its risk budget tool to prescribe "risk allowances" to various facilities and that WTP will be expected to make "good glass" and live with it's share of the risk allowance (i.e., not use more than its allotted share of the IDF risk budget). It is not clear if the risk allowance will be managed using waste acceptance criteria, or something additional. Lori Huffman suggested we take another look at the current wording and see if it could better convey this idea. Lori will also talk to CH2M HILL regarding the risk budget tool.

Technetium: Brenda indicated Ecology staff had discussed WTP comments regarding deletion of conditions related to Tc ion exchange with agency legal counsel. Counsel has requested some additional information, but Brenda could not comment further on the possible outcome of these discussions.

Wear Plates: Brenda could not provide any new information on the issue of wear plates, Ecology is waiting for additional information from BNI/ORP at the end of February.

CCN: 150233

Attachment 5: Draft Transition Period Process Revision Schedule

Draft Transition Period Process Revision Schedule

| | |
|-------------------------------------|--|
| 3/1/07 - 4/15/07 (1.5 months) | Finalize Approach for New Permit Process and Issuance of the Permit <ul style="list-style-type: none"> o Topics for discussion <ul style="list-style-type: none"> o Final permit condition o Stamping o Identification of DWP items to engineering / construction / IQRPE o Constructing to permit drawings + change documents (e.g., DCNs) o Resolution of comments with ATS or change documents (e.g., DCNs) o Millrun (additional paper) o Construction of utilities regardless of drawing status in the permit |
| 4/16/07 - 7/15/07 (3 months) | Trend New Permit Process |
| 7/16/07 - 9/15/07 (2 months) | Draft Procedures <ul style="list-style-type: none"> o 5 documents minimum <ul style="list-style-type: none"> o DWP Maintenance o DWP Engineering Guide o Millrun Guide o Tank & MTU document o Stamping |
| 9/16/07 - 10/15/07 (1 month) | Approval of Revised Process |
| 10/16/07 - 11/30/07 (1.5 months) | Training / Contingency |
| 9 Months Total | |

Transition Period Process:

- o Continue with the existing process to support construction and engineering
- o Include explicit disclaimers in correspondence

Example disclaimers are provided below:

Proposed for WTP:

"This dangerous waste permitting process is being revised in support of the issuance of the DWP. During this time, any bolding/ghosting of drawings that are submitted to Ecology is specifically to support IQRPE assessments, installation inspections, and DWP component identification in CIS."

Proposed for Ecology:

"Ecology is approving only the design changes identified in the permittees submittal, and decisions regarding the regulation of support systems (e.g. utilities) and instrumentation will be made at a later date. Only those components in direct contact with the waste require installation inspections or IQRPE reports."



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