



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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November 10, 1993



Mr. James D. Bauer
U. S. Department of Energy
P. O. Box 550
Richland, WA 99352

Dear Mr. Bauer:

Re: Cross Site Transfer Line, Project W-058

Mr. Scott McKinney, of our office, has given me a series of viewgraph slides presented to him at a meeting on August 25, 1993, regarding the Cross Site Transfer Line showing that detector cables are not proposed for use in this installation.

In this presentation, there is one slide entitled, "Leak Detection Response," which purports to show detector response time. Even if we consider the limited scope of a slide, this is quite an oversimplification. What slope are you assuming here?

The fact is that the response times here are in violation of the law. WAC 173-303-145 requires that "immediate" notification be given of spills to secondary containment that exceed ten gallons. For a leak of one gallon per hour, the spill will have been in violation of the law for 86 hours. By no stretch of the imagination can this delay be termed "immediate."

One reason given for not using a detector cable is difficult maintenance. If the average length between detectors is assumed to be 500 feet, with a crest halfway between, then finding a leak to repair will require uncovering an average 125 feet of pipe. This is not ease of maintenance. If detector cables are unreliable, please present proof.



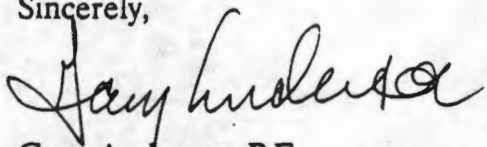
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Are the proposed sumps sized to accept the volume of liquid that can be stored in the annulus of existing double shell pipe?

Please furnish us with enough data to understand what you propose. Be certain that your design conforms to regulations.

If you have questions, please call me at (206) 438-7558.

Sincerely,



Gary Anderson, P.E.
Nuclear and Mixed Waste Management Program

GA:dr

cc: Dan Duncan, EPA
Doug Sherwood, EPA
Paul Carter, DOE
Becky Austin, WHC ✓
Sue Price, WHC
Kelly Eager, WHC

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Becky A. Austin

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