



June 24, 2019

Brian T. Vance, Manager
Richland Operations Office
United States Department of Energy
PO Box 550, MSIN: A7-50
Richland, Washington 99352

Re: Lift of Washington State Department of Ecology and United States Environmental Protection Agency Creation of Danger Stop Work Pursuant to Article XXXII Hanford Federal Facility Agreement and Consent Order for Higher Risk Work

References: See page 2

Dear Brian T. Vance:

On January 9, 2018, the Department of Ecology (Ecology) and the United States Environmental Protection Agency (EPA) invoked Hanford Federal Facility Agreement and Consent Order (HFFACO) Article XXXII – “Creation of Danger” (Reference 1).

Ecology and EPA (regulatory agencies) ordered all work to stop at the Plutonium Finishing Plant (PFP) until we notified the United States Department of Energy Richland Operations Office (USDOE-RL) of our determination that corrective actions taken and proposed are sufficient to allow the remaining work at PFP to continue and that work may resume.

On June 26, 2018, the regulatory agencies determined that all pre-start corrective actions and findings (References 1 and 2) for resumption of lower-risk work were completed. In that determination, Ecology and EPA required several actions prior to resumption of the higher-risk demolition work (Reference 3). Those actions included:

- Regulatory review of higher-risk work packages, completed May 22, 2019.
- A briefing to Ecology and EPA management, completed June 18, 2019. The briefing covered:
 - Detail on the effectiveness of corrective actions in the Resumption of Work Plan (Reference 3).
 - Lessons learned from completion of the lower-risk demolition to date.
- Fulfillment of pre-start criteria #1 by:
 - Providing Non Destructive Assay results of the filters from the IONEX exhausters, completed June 13, 2019 (Reference 4).
 - Commitment from USDOE-RL to use the IONEX exhausters as described in the finalized Exhauster Agreement.

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- Fulfillment of pre-start criteria #2 by committing to continue sharing lessons learned at monthly Project Manager Meetings as the lower-risk demolition work of the building continues.
- Commitment from USDOE-RL to continue to notify Ecology and EPA prior to the restart of each phase of lower and higher risk work at PFP.

After reviewing this information, Ecology and EPA are lifting the Article XXXII Stop Work for the Higher Risk Demolition, including demolition of the 236Z Building and 234-5Z A&C lines.

If you have questions regarding this order, please contact Jim McAuley, Radiation Program Manager for EPA, at mcauley.jim@epa.gov or (206) 553-1987, or Theresa Howell, Interim Facility Transition Project Manager for Ecology, at theresa.howell@ecy.wa.gov or (509) 372-7955.

Sincerely,



Alexandra K. Smith
Program Manager
Nuclear Waste Program
Washington State Department of Ecology



David Einan
Manager
Hanford Project Office
United States Environmental Protection Agency

tqh/lkd

By certified mail

References:

1. EPA and Ecology letter, dated January 9, 2018, "Creation of Danger Pursuant to Article XXXII Hanford Federal Facility Agreement and Consent Order (HFFACO)"
2. EPA and Ecology letter, dated June 26, 2018, "Items Needed to Lift the Washington State Department of Ecology (Ecology) and the United States Environmental Protection Agency (EPA) Creation of Danger Stop Work Pursuant to Article XXXII of the Hanford Federal Facility Agreement and Consent Order (HFFACO)"
3. CHPRC-03689, received May 15, 2018, "Plutonium Finishing Plant Work Resumption Plan"
4. CHPRC Interoffice Memorandum 3BA100-NDA-19-001, dated June 5, 2019, "NDA Results for SLB-2 #0088039"

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Environmental Portal
Hanford Facility Operating Record
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USDOE-RL Correspondence Control

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Hanford Administrative Record
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