



U.S. Department of Energy Hanford Site

20-ESQ-0054

April 29, 2020

Ms. Alexandra K. Smith, Program Manager
Nuclear Waste Program
Washington State Department of Ecology
3100 Port of Benton Boulevard
Richland, Washington 99354

Dear Ms. Smith:

RESPONSE TO WASHINGTON STATE DEPARTMENT OF ECOLOGY DANGEROUS WASTE COMPLIANCE INSPECTION ON SEPTEMBER 17, 2019, AT THE HEXONE STORAGE AND TREATMENT FACILITY, RESOURCE CONSERVATION AND RECOVERY ACT SITE ID: WA7890008967, NUCLEAR WASTE PROGRAM COMPLIANCE INDEX NUMBER: 19.680

This letter responds to the March 10, 2020, 20-NWP-053 letter regarding your staff's concern in the inspection report, which stated disposal records for several containers were not included in the records provided. The attached Inspection Document and Information Request Form contains the documentation request from the inspector to CH2M HILL Remediation Company (CHPRC) Inspection Coordinator. Item 8 of the documentation requested disposal records for the parent containers of the containers listed, not the disposal records for the containers or the daughter containers. Because there were no parent containers associated with the listed containers, no additional information was provided in response to that part of the request.

On March 3, 2020, the CHPRC Inspection Coordinator spoke with the inspector regarding another issue with documentation provided for this inspection. During that call, the inspector indicated he wanted the disposal records for the daughter containers, not the parent containers. When the inspection coordinator asked the inspector if he wanted to request the disposal records for the daughter containers, the inspector indicated he did not plan to request them.

If you have any questions, please contact me, or your staff may contact Brian J. Stickney, Assistant Manager for Safety and Environment, Richland Operations Office, on (509) 376-9079.

Sincerely,

 Digitally signed by Brian T. Vance
DN: cn=Brian T. Vance, o=Office of River
Protection, ou=Department of Energy,
email=brian.t.vance@orp.doe.gov, c=US
Date: 2020.04.29 15:47:38 -0700

Brian T. Vance
Manager

ESQ:AKW

Attachment:

1. Inspection Document

cc w/attach:

T. Bratvold, CHPRC

K. A. Conaway, Ecology

J. W. Mathey, Ecology

L. C. Petersen, CHPRC

J. Price, Ecology

S. Szendre, MSA

Administrative Record, TSD: TS-2-2 (Hardcopy)

Ecology NWP Library (Hardcopy)

Environmental Portal, G3-35

HF Operating Record (J. K. Perry, MSA, A3-01)

cc w/o attach:

D. B. Bartus, EPA

J. Bell, NPT

J. E. Bramson, CHPRC

L. Contreras, YN

M. N. Jaraysi, CHPRC

M. Johnson, CTUIR

K. Schanilec, EPA

D. G. Singleton, CHPRC

Attachment
Letter Number 20-ESQ-054

Washington State Department of Ecology
Inspection Document and Information Request Form

Consisting of Consisting of 3 pages including cover sheet



Department of Ecology Nuclear Waste Program

Inspection Document and Information Request Form

Ecology Instructions: This document should be completed electronically and sent by e-mail as an attachment to the facility point of contact. Print the e-mail and attach with this form to document who the request was sent to and the date of the request. Before sending out the document request, you must discuss and agree upon the date due with the facility point of contact. If sending out another document request using an existing form, make sure to update the date received column. Use another item number if specific parts of previously requested information are needed.

Recipient Instructions: The following documents and/or information are being requested by Ecology. Complete the request by the date due listed for any items that have no date received entered. Requests are specified by request type. Contact the Ecology requestor if an extension is needed.

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|---|-----------------------------------|
| Facility Point of Contact: Mitch Marrott - CHPRC | |
| Ecology Requestor: Jared Mathey | Inspection Date: 9/17/2019 |
| Facility Name: Hexone Storage and Treatment Facility | Inspection Number: 19.680 |
| Site Location: 200 Area West – Hanford Site | RCRA ID: WA7890008967 |

| Item Number | Request Date | Date Due | Requested Document / Information* | Request Type Number | Date Received |
|-------------|--------------|----------|---|---------------------|---------------|
| 1 | 9/17/19 | 9/17/19 | Attendance Roster for Hexone Storage and Treatment Facility Inspection Index No. 19.680. | Type 3 | 9/17/19 |
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| 2 | 9/17/19 | 9/17/19 | Building Emergency Plan for Surveillance and Maintenance – HNF-IP-0263-CP S & M Revision 19 | Type 3 | 9/17/19 |
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| 3 | 9/17/19 | 9/17/19 | Datasheet Appendix B, dated June 11, 2019 from CPSM-PRO-EP-53098 CPRM Facility TSD’s Inspection | Type 3 | 9/17/19 |
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| 4 | 9/17/19 | 9/17/19 | Central Plateau Risk Management Dangerous Waste Training Plan PRC-STD-TQ Revision 2, Change 1 | Type 3 | 9/17/19 |
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| 5 | 9/18/19 | 10/23/19 | Personnel Training Records for the following: a) Deborah Older – Nuclear Chemical Operator b) Brian Cordray – Field Work Supervisor | Type 3 | |
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*This form may be updated and reused if new information is needed or request types change.

Request Types

- Type 1** – Record(s) requested to be available for review during an inspection.
- Type 2** – Record(s) requested to be available for review at documents review center.
- Type 3** – Record(s) requested to be made available to Ecology.
- Type 4** – Questions that need to be answered.
- Type 5** – Other type of request, specify.

| Item Number | Request Date | Date Due | Requested Document / Information* | Request Type Number | Date Received |
|-------------|--------------|----------|--|---------------------|---------------|
| 6 | 9/18/19 | 10/23/19 | Provide a photo of labels or signs for the Hexone Storage and Treatment Facility Tanks in accordance with WAC 173-303-640(5)(d) conveying the hazard of Toxic. | Type 3 | |
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| 7 | 9/18/19 | 10/23/19 | Provide the Hexone Tank Ancillary Equipment Excel spreadsheet as shown during the inspection including both the short and export sheet tabs. | Type 3 | |
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| 8 | 9/18/2019 | 10/23/19 | <p>In accordance with WAC 173-303-380(2), WAC 173-303-380(1)(a), WAC 173-303-380(1)(b), WAC 173-303-380(1)(c), WAC 173-303-380(1)(m), WAC 173-303-380(1)(o), and if applicable WAC 173-303-380(1)(k), (1)(l), and (1)(n), provide the operating records for the following containers previously stored at the Central Waste Complex. This request includes disposal records and the above operating record requirements for all parent containers associated with the below listed containers.</p> <ul style="list-style-type: none"> • 0005021 • 0005394 • 0005396 • 0005397 • 0005440 • HEXO-92-000001 • HEXO-92-000002 • HEXO-92-000009 • HEXO-92-000010 • HEXO-92-000014 • HEXO-92-000015 • HEXO-92-000016 • HEXO-92-000017 • HEXO-92-000018 • HEXO-92-000019 • HEXO-92-000028 • HEXO-93-000300 | Type 3 | |
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| | | | | | |
| 9 | 9/18/2019 | 10/23/19 | In accordance with WAC 173-303-380(2), WAC 173-303-380(1)(a), WAC 173-303-380(1)(b), WAC 173-303-380(1)(j), WAC 173-303-380(1)(o), and WAC 173-303-380(1)(r), provide the operating records for Tanks 276-S-141 and 276-S-142, including all operating records for treatment and disposal of waste from Tanks 276-S-141 and 276-S-142. | Type 3 | |
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