



OFFICE OF RIVER PROTECTION

P.O. Box 450, MSIN H6-60
Richland, Washington 99352

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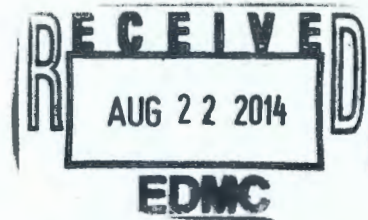
AUG 20 2014



14-ECD-0042

CCN: 269741

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



Ms. Hedges:

WASTE GENERATOR COMPLIANCE PLAN FOR THE WASTE TREATMENT AND IMMOBILIZATION PLANT CONSTRUCTION SITE

Reference: Ecology letter from N. Ware to K.W. Smith, ORP, and P. McCullough, BNI, "Department of Ecology's (Ecology) Dangerous Waste Compliance Inspection of Generator Activities at the Waste Treatment and Immobilization Plant (WTP), RCRA Site ID WA7890008967, on April 30, 2014," 14-NWP-152, dated July 22, 2014.

In the Reference, the Washington State Department of Ecology (Ecology) identified six deficiencies associated with waste generator activities at the Waste Treatment and Immobilization Plant (WTP) construction site. The deficiencies were associated with waste manifesting, training plan requirements for dangerous waste and universal waste (UW) management, container labeling, and 90-day accumulation area inspection logs. The WTP agrees with Ecology's observations and is currently working toward implementation of corrective actions as identified in the Reference. A summary of the intended corrective actions is provided below:

- Items 1, 5, and 6 in the Reference were corrected at the time of inspection and no further action is required.
- The training plan, 24590-WTP-GPP-SENV-017, *90-Day Accumulation Area Training*, is being revised to include groundwater contamination incidents as an element of training, appropriate job descriptions and job titles for affected personnel, and additional required reading. The revision to the training plan will be provided to Ecology as objective evidence for compliance with Items 2 and 3 in the Reference.

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- The qualification plan for Environmental Project Leads, QAL-5258, *90-Day Accumulation Area*, is being revised to include the job title for Environmental Project Leads, the training requirement for waste segregation, and Hazardous Waste Operations and Emergency Response Regulations initial and refresher as a training requirement. The revised QAL-5258 will be provided to Ecology as objective evidence for compliance with Item 3 in the Reference.
- Associated with the revised training plan and QAL-5258, relevant training records for affected personnel will be provided to Ecology as identified in the Reference to complete Item 3 in the Reference.
- WTP Hanford General Employee Training (24590-WTP-CRM-TRA-000001) is being revised with an expanded discussion of waste management at the WTP, including all UW types at the WTP construction site to offer general awareness training for WTP personnel and compliance with Item 4 in the Reference.
- An updated UW training bulletin will also be presented to WTP construction personnel who generate UW. The revised training bulletin and attendance rosters will be provided to Ecology as further evidence of compliance with Item 4 in the Reference.

The revised training plan, qualification QAL-5258, relevant training records, WTP Hanford General Employee Training documentation, and UW training bulletin will be provided to Ecology within 90 days (November 20, 2014).

In addition to the six deficiencies identified in the Reference, Ecology also raised four concerns that are being resolved and will be completed within 180 days (February 18, 2015). The actions to address those concerns include:

- Update WTP Procedure 24590-WTP-GPP-SENV-007, *Dangerous Waste Accumulation and Handling*, to include radioactive mixed waste in the scope and add the statement that waste moves to the centralized satellite accumulation areas "at the end of the job or the end of the shift, whichever comes first."
- Revise or generate a single contingency plan for waste generator activities that provides specific regulatory citations from WAC 173-303-340, 350, and 360 to facilitate future compliance assessments.
- Maintain consistency with job titles between training documentation addressed with the above corrective actions.

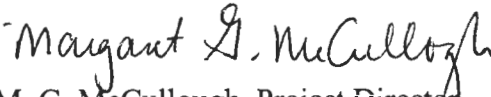
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If you have any questions, please contact Lori A. Huffman, Director, Environmental Compliance Division, Office of River Protection, (509) 376-0104, or Roger Landon, Bechtel National, Inc., Environmental Protection Manager (509) 371-2165.


M. G. McCullough, Project Director
Bechtel National, Inc.


Kevin W. Smith, Manager
Office of River Protection

ECD:GMN

cc: L.W. Baker, BNI
C.D. Cornelison, BNI
S.S. Crawford, BNI
J.H. Dunkirk, BNI
B.G. Erlandson, BNI
C.M. Gallaway, BNI
S. Hajner, BNI
K.D. Irwin, BNI
J.M. St. Julian, BNI
R.J. Landon, BNI
M.G. McCullough, BNI
C.A. Musick, BNI
S.A. Neubauer, BNI
R.C. Nugent, BNI
W.S. Oxenford, BNI
E.F. Sproat, III, BNI
T.L. Teigen, BNI
R.L. Widhalm, BNI
Administrative Record (WTP H-0-8)
BNI Correspondence
Environmental Portal, LMSI