



**OFFICE OF RIVER PROTECTION**

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

**AUG 09 2017**

17-ECD-0029 REISSUE

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

Ms. Smith:

SUBMITTAL OF HANFORD FACILITY RESOURCE CONSERVATION AND RECOVERY ACT PERMIT MODIFICATION NOTIFICATION FORM 24590-HLW-PCN-ENV-14-004, MELTER 1 FEED AND AGITATION SYSTEM

- References:
1. WA7890008967, "Dangerous Waste Portion of the Hanford Facility Resource Conservation and Recovery Act Permit for the Treatment, Storage, and Disposal of Dangerous Waste, Operating Unit 10, 'Waste Treatment and Immobilization Plant.'"
  2. BNI letter from F.M. Russo to V. Peery, Ecology, "Request for Certification of Records as Confidential," CCN: 243305, dated March 5, 2012.
  3. Ecology letter from D. McDonald to K. Smith, ORP, and F. Russo, BNI, "Approval of 24590-HLW-PCN-ENV-11-009, Class 1 Modification to the *Hanford Facility Resource Conservation and Recovery Act (RCRA) Permit, Dangerous Waste Portion, Revision 8C, for the Treatment, Storage, and Disposal of Dangerous Waste, Part III, Operating Unit 10, Waste Treatment and Immobilization Plant (WTP Permit) WA7890008967,*" 13-NWP-002, dated January 9, 2013.
  4. BNI letter from M.G. McCullough to K.W. Smith, ORP, "Submittal of Hanford Facility Resource Conservation and Recovery Act Permit Modification Notification Form 24590-HLW-PCN-ENV-14-004," CCN: 294505, dated April 20, 2017.

This letter is being reissued to remove Official Use Only markings from the notification form.

This letter transmits Hanford Facility Resource Conservation and Recovery Act Permit Modification Notification Form 24590-HLW-PCN-ENV-14-004, attached, for the Washington State Department of Ecology (Ecology) review and approval. The form describes a requested Class 1 modification to Reference 1.

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AUG 09 2017

Modification Notification Form 24590-HLW-PCN-ENV-14-004 replaces Piping and Instrumentation Drawings (P&ID) 24590-HLW-M6-HMP-00001002, Rev. 0, with 24590-HLW-M6-HMP-00001002, Rev. 1, in Appendix 10.2. The updated P&ID is associated with the High-Level Waste Melter 1 Feed and Agitation System. P&ID 24590-HLW-M6-HMP-00001002, Rev. 0, is currently listed as Confidential Business Information (CBI). Bechtel National, Inc. Waste Treatment and Immobilization Plant previously requested that this P&ID be considered CBI (Reference 2). Ecology approved this request (Reference 3) in response to Bechtel National, Inc. Permit Modification 24590-HLW-PCN-ENV-11-009. Based upon the same justification, this letter requests that Ecology accept the revised P&ID as CBI.

If you have any questions, please contact me, or your staff may contact Gae M. Neath, Environmental Compliance Division, (509) 376-7828.



Robert G. Hastings, Assistant Manager  
Technical and Regulatory Support

ECD:GMN

Attachment

cc w/attach:

B.L. Curn, BNI  
B.G. Erlandson, BNI  
S. Greagor, BNI  
M. McCullough, BNI  
S.K. Murdock, BNI  
Administrative Record (WTP H-0-8)  
BNI Correspondence  
Environmental Portal

cc w/o attach:

R.S. Skeen, CTUIR  
S.L. Dahl, Ecology  
D. McDonald, Ecology  
G.P. Bohnee, NPT  
K. Niles, Oregon Energy  
E.D. MacAlister, RL  
R. Jim, YN  
D. Rowland, YN

cc electronic:

J. Cantu, Ecology (2 hard copies)  
A.S. Carlson, Ecology (6 hard copies, Public Review)  
M.E. Jones, Ecology  
J.K. Perry, MSA  
A.C. McKarns, RL

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document as non-sensitive information

Attachment  
17-ECD-0029 REISSUE  
(3 Pages Excluding Cover Sheet)

Hanford Facility RCRA Permit Modification Notification  
Form 24590-HLW-PCN-ENV-14-004

<b>OFFICIAL USE ONLY</b>
May be exempt from public release under the Freedom of Information Act (5 U.S.C. 552) Exemption number and category: <u>4</u>
<u>COMMERCIAL / PROPRIETARY</u>
Department of Energy review required before public release
Name/Org: <u>G. NEATH / ORP</u> Date: <u>8-7-17</u>
Guidance (# applicable): <u>N/A</u>

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Quarter Ending March 31, 2016

24590-HLW-PCN-ENV-14-004

**Hanford Facility RCRA Permit Modification Notification Form  
Part III, Operating Unit 10  
Waste Treatment and Immobilization Plant**

**Index**

Page 1 of 2: Hanford Facility RCRA Permit, Part III, Operating Unit 10, Waste Treatment and Immobilization Plant  
Update HLW Vitrification Building Piping and Instrumentation Diagram (P&ID) for the HLW Melter Process  
System (Melter 1 Feed and Agitation) in Appendix 10.2 of the Dangerous Waste Permit.

Submitted by Co-Operator:

Reviewed by ORP Program Office:

Roger J. Landon 3/22/17  
Roger J. Landon Date

for William A. Bond 5/22/17  
J. F. Grindstaff Date

DOES NOT CONTAIN  
OFFICIAL USE ONLY INFORMATION  
Name/Org: G. NEATH/ORP Date: 8-7-17

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Hanford Facility RCRA Permit Modification Notification Form	
Unit: <b>Waste Treatment and Immobilization Plant</b>	Permit Part: <b>Part III, Operating Unit 10</b>

**Description of Modification:**  
 The purpose of this Class 11 modification is to update the following Piping and Instrumentation Diagram (P&ID) for the HLW Melter Process System (Melter 1 Feed and Agitation) in Appendix 10.2.

Appendix 10.2			
Replace:	24590-HLW-M6-HMP-00001002 Rev. 0 (CBI)	With:	24590-HLW-M6-HMP-00001002 Rev. 1 (CBI)

The referenced P&ID has been revised. The revision incorporated changes provided in applicable document change forms (e.g., DCN, SCN, SDDR, FCN, FCR, etc.) and changes associated with the resolution of comments on change documents since the issuance of the last revision of the permitted drawing.

This modification requests Ecology approval and incorporation of 24590-HLW-M6-HMP-00001002 Rev. 1 (CBI) into the permit. The specific changes to this P&ID are indicated in notes 9, 11, 13, 14, and in the clouds and revision triangles. Revisions are the result of ongoing design changes.

Significant changes are summarized below:

- Incorporated 24590-HLW-M6N-HMP-00094 and 24590-HLW-M6N-HMP-20047.
- Revised depiction of C&I supplied valve from gate to ball, line sizes, equipment description, off sheet connector, and instrumentation for post-accident monitoring function.
- Added the note "this P&ID has been reviewed by E&NS (now Nuclear Safety Engineering) for all limited change documents that were previously issued".

This PCN updates information in Appendix 10.2 to reflect current design. This DWP component may be re-evaluated to confirm design adequacy. If the re-evaluation results in future design changes, the changes will be reviewed by Ecology in subsequent permit modifications.

The following outstanding change documents have been submitted to Ecology pursuant to permit condition III.10.C.9.h and are maintained in the WTP Operating Record: None

In accordance with Permit Condition III.10.C.2.e, this permit modification sent to Ecology may include page changes to the Permit, attachments, and permit application supporting documentation.

WAC 173-303-830 Modification Class:	Class 1	Class 11	Class 2	Class 3
Please mark the Modification Class:		X		

Enter relevant WAC 173-303-830, Appendix I Modification citation number: N/A  
 Enter wording of WAC 173-303-830, Appendix I Modification citation:  
 In accordance with WAC 173-303-830(4)(d)(i), this modification notification is requested to be reviewed and approved as a Class 11 modification. WAC 173-303-830(4)(d)(ii)(A) states, "Class 1 modifications apply to minor changes that keep the permit current with routine changes to the facility or its operation. These changes do not substantially alter the permit conditions or reduce the capacity of the facility to protect human health or the environment. In the case of Class 1 modifications, the director may require prior approval."

Modification Approved/Concur: <input type="checkbox"/> Yes <input type="checkbox"/> Denied (state reason below) <u>Reason for denial:</u>	Reviewed by Ecology:  <div style="display: flex; justify-content: space-between;"> <span>S. Dahl</span> <span>Date</span> </div>
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 OFFICIAL USE ONLY INFORMATION  
 Name/Org: G. NEATH / DRP Date: 2-7-17