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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

3100 Port of Benton Blvd • Richland, WA 99354 • (509) 372-7950

March 18, 2009

Ms. Shirley J. Olinger, Manager
Office of River Protection
United States Department of Energy
P.O. Box 450, MSIN: H6-60
Richland, Washington 99352

Mr. William S. Elkins, Project Director
Bechtel National, Inc.
2435 Stevens Center Place, MSIN: H4-02
Richland, Washington 99354

Re: Submittal of Design Package LAW-018 for incorporation in the next Draft Permit for the *Hanford Facility Resource Conservation and Recovery Act 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), WA7890008967 (WTP Permit)*

Reference: See page 2

Dear Ms. Olinger and Mr. Elkins:

Thank you for the Low-Activity Waste (LAW) facility design package LAW-018, Revision 0, *Miscellaneous Unit Subsystem Equipment for LAW Facility LAW Melter Process System*. The Department of Ecology will incorporate the design information in the next WTP Permit and make the following changes:

- We will populate Permit Table III.10.H.C (LAW Vitrification System Process and Leak Detection System Instruments and Parameters) with the instruments in Table 1 of *System Logic Description for Low-Activity Waste Facility Melter Process System* (SLD LMP), 24590-LAW-PER-J-07-001, Revision 0.
- We will mark item 24 in Part III, Operating Unit 10, Appendix 1.0, Compliance Schedule as complete.

As we noted in our response to comments and in meetings with your staff, the regulated instruments list in Table 1 of the SLD LMP is incomplete. We understand Bechtel National, Inc. (BNI) plans to revise piping and instrumentation diagrams (P&ID) and system descriptions and is replacing software functional specifications with J3 logic diagrams. These revised and new documents will capture information now in SLD LMP and other WTP documents. As a result, we are not requiring you to include other regulated instruments in the SLD LMP at this time. We are beginning efforts to populate instrument tables in the WTP Permit (Permit Tables III.10.E.E-H, III.10.G.C, III.10.H.C, and III.10.J.C).



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We will update instrument tables after we evaluate revised P&ID's, system descriptions, and other instrument logic documents. We will continue to work with BNI and United States Department of Energy-Office of River Protection during this transition to ensure regulated instrumentation and system logic are captured appropriately in the WTP Permit.

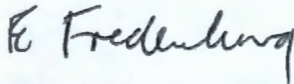
Please correct the following error in the SLD LMP, Table 1, at the next revision:

- Table 1, page 6: Per DCN 24590-LAW-M6N-LMP-00019, the P&ID for "Melter 2 Lid Cooling," should be 24590-LAW-M6-LMP-00035 instead of 24590-LAW-M6-LMP-00005.

BNI requested Confidential Business Information status for seven LAW melter design documents and associated design change notices (Reference 1). We are considering that request and will respond by separate correspondence.

If there are any questions, contact me at 509-372-7899 or Tracy Gao at 509-372-7901.

Sincerely,



Ed Fredenburg
Acting Tank Waste Disposal Project Manager
Nuclear Waste Program

ke/jc

Reference: Letter 09-ESQ-056 received February 24, 2009, from S. J. Olinger, USDOE-ORP, to J. A. Hedges, Ecology, "Submittal of Dangerous Waste Permit (DWP) Package Low-Activity Waste (LAW)-018 for the Waste Vitrification Facility."

cc: See page 3

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cc electronic:

Dave Bartus, EPA
John Eschenberg, USDOE
Lori Huffman, USDOE
Tony McKarns, USDOE
Gae Neath, USDOE
Don Sommer, USDOE
William Taylor, USDOE
Julie Colby, BNI
Barry Curn, BNI
Brad Erlandson, BNI
Peggy Fisher, BNI
Dennis Klein, BNI
Sandi Murdock, BNI
Phil Peistrup, BNI
Suzette Thompson, FHI

cc: **Administrative Record: Tank Waste Treatment Requirements**
Environmental Portal
Hanford Operating Record General File
USDOE-ORP Correspondence Control