

Office of River Protection



FEB 01 2006

06-WTP-011

Ms. Jane Hedges, Program Manager  
Nuclear Waste Program  
State of Washington  
Department of Ecology  
3100 Port of Benton Blvd.  
Richland, Washington 99352

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FEB 06 2006

EDMC

Dear Ms. Hedges:

WASTE TREATMENT AND IMMOBILIZATION PLANT (WTP) DANGEROUS WASTE PERMIT COMPLIANCE SCHEDULE

- 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, Chapter 10 and Attachment 51, Waste Treatment and Immobilization Plant."
  2. ORP letter from R. J. Schepens to M. A. Wilson, Ecology, "Independent Qualified Registered Professional Engineer (IQRPE) Reports for the Hanford Tank Waste Treatment and Immobilization Plant (WTP)," 05-ED-052, dated June 17, 2005.

The purpose of this letter is to provide you with notice that the near term items in the Compliance Schedule of the WTP portion of the Hanford Facility Resource Conservation and Recovery Act of 1976 Permit are in jeopardy and are unrecoverable. In addition, this letter is also intended to provide notification to the U.S. Department of the Ecology (Ecology) pursuant to WAC 173-303-815(3)(a)(iii). Though the resulting final WTP cost and schedule are still not known, based on the initial revised Estimate at Completion (EAC) submittal from Bechtel National, Inc. (BNI) December 22, 2005, the remaining Compliance Schedule Items in the attachment incorporated into the permit as of January 17, 2006 (Reference 1) will not be met. Though the work could potentially be re-sequenced to accomplish some items, this would negate the necessary consistency required between facilities as designs are advanced. Completion of the remaining compliance schedule items is dependent upon the finalization of the WTP EAC, and resolution of related Hanford Federal Facility Agreement and Consent Order (HFFACO) milestone issues.

Factors affecting our ability to meet the compliance due dates include:

- Commodity growth;
- Revised seismic criteria affecting structural design of the Pretreatment (PT) and High-Level Waste Facilities;
- Evaluation of hydrogen buildup in piping and vessels in the PT Facility;
- Difficulty in mixing slurries in the PT Facility;
- A reduced Fiscal Year 2006 funding level; and
- Use of final rather than initial design for permit packages.

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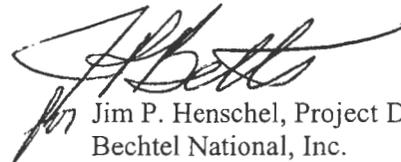
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As Ecology is aware, the compliance schedule was based on submittal of permit design packages, and IQRPE reports, based on initial design information, not final vendor information. This approach resulted in the IQRPE including words regarding "design intent" in their reports. Ecology has advised the U.S. Department of Energy (DOE), Office of River Protection (ORP) and BNI that they will not accept permit packages based on initial design information any longer. ORP and BNI have agreed to provide permit design packages based on vendor information and calculations, so that the "design intent" language can be deleted from IQRPE certifications (Reference 2). As part of these discussions, Ecology was advised that this would impact the schedule for permit design package submittal.

DOE, BNI, and the U. S. Army Corps of Engineers are in the process of evaluating the impact of these changes through the development of a revised cost and schedule estimate with completion scheduled for the summer of 2006. Additional information is contained in the Semi-Annual Compliance Report for the period July – December 2005 to be submitted in accordance with HFFACO milestone M-62-01 under separate cover. DOE and BNI will continue to constrain construction activities to those elements that have been incorporated into the permit or are authorized by Ecology.

Should you have any questions, please contact us, or your staffs may contact Lori Huffman, ORP, (509) 376-0104 or Bradley Erlandson, BNI, (509) 371-3826.

  
Roy J. Schepens, Manager  
Office of River Protection

  
Jim P. Henschel, Project Director  
Bechtel National, Inc.

WPD:JLS

Attachment

cc: See page 3

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cc w/attach:

B. G. Erlandson, BNI  
J. P. Henschel, BNI  
R. E. Lawrence, BNI  
J. Markillie, BNI  
J. Cox, CTUIR  
S. Harris, CTUIR  
M. Anderson-Moore, Ecology  
B. L. Becker-Khaleel, Ecology  
R. K. Biyani, Ecology  
L. Cusack, Ecology  
S. L. Dahl, Ecology  
G. P. Davis, Ecology  
K. Elsethagen, Ecology  
E. A. Fredenburg, Ecology  
T. Z. Gao, Ecology  
J. Hensley, Ecology  
G. Bohnee, NPT  
K. Niles, Oregon Energy  
A. C. McKarns, RL  
R. Jim, YN  
Administrative Record  
Environmental Portal, LMSI

### Near Term WTP Compliance Schedule Items

Item Number	Description	Due Date
Item 10	Submit detailed information associated with containers and container management area	03/22/06
Item 13	Submit engineering information for each dangerous waste tank and primary sump to be included in the permit	04/29/06
Item 14	Submit engineering information for each tank system ancillary equipment to be included in the permit	04/29/06
Item 19	Submit engineering information for Pretreatment Plant Miscellaneous Unit Systems	02/11/06
Item 20	Submit engineering information for Pretreatment Plant Miscellaneous Unit Systems equipment	04/12/06
Item 24	Submit engineering information for equipment for each LAW Vitrification Miscellaneous Treatment Unit subsystem	06/02/06
Item 28,	Submit engineering information for HLW Vitrification Miscellaneous Treatment Unit sub-system	06/18/06
Item 29	Submit engineering information for equipment for each HLW Vitrification Miscellaneous Treatment Unit sub-system	06/18/06