



U.S. Department of Energy Hanford Site

February 17, 2021

21-ESQ-000467

Mr. David Bowen, Program Manager
Nuclear Waste Program
Washington State Department of Ecology
3100 Port of Benton Boulevard
Richland, Washington 99354

Dear Mr. Bowen:

HANFORD FACILITY NONCOMPLIANCE REPORT FOR CALENDAR YEAR 2020 (PERMIT CONDITION I.E.19)

This letter serves as the Hanford Facility Noncompliance Report for Calendar Year (CY) 2020, submitted to meet the March 1, 2021, due date specified in the Hanford Facility Resource Conservation and Recovery Act Permit, WA7890008967 (Permit) Condition I.E.19.

Permit Condition I.E.19 states: "The Permittees shall report to Ecology all instances of noncompliance, not otherwise required to be reported elsewhere in this Permit, at the time the Annual Dangerous Waste Report is submitted." This Permit condition is interpreted to mean instances of noncompliance with the Permit, associated with treatment, storage, and/or disposal units incorporated in Revision 8C of the Permit. Noncompliances with the Permit conditions alleged by the Washington State Department of Ecology or reported by the Permittees through Notices of Violation, Notices of Correction, Inspection Reports, Project Manager Meeting Minutes, or other written correspondence are omitted from this report as they are reported via other means.

For CY 2020, the COVID-19 world-wide pandemic created exceptions to the normal reporting process for items contained in this report. These items were first reported monthly in the COVID-19 Compliance Assistance Table and are also being included in this noncompliance report.

Mr. David Bowen
21-ESQ-000467

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February 17, 2021

If you have any questions, please contact me, or your staff may contact Glyn D. Trenchard, Acting Assistant Manager for Safety and Environment, Richland Operations Office, on (509) 373-4016.

Sincerely,

Brian T. Vance Digitally signed by Brian T. Vance
Date: 2021.02.17 07:27:17 -08'00'

Brian T. Vance
Manager

ESQ:ACM

Attachment:
Hanford Facility Noncompliance Report
for Calendar Year 2020

cc w/attach:

J. E. Bramson, CPCCo
S. L. Dahl-Crumpler, Ecology
M. D. Ellefson, PNNL
D. Faulk, BNI
A. P. Fergusson, HMIS
M. D. Gerle, WRPS
R. D. Haggard, BNI
J. A. Lerch, CPCCo
P. W. Martin, CPCCo
J. K. Perry, HMIS
M. T. Schanke, CPCCo
S. S. Scott, WRPS
D. D. Teel, HMIS
E. J. Van Mason, WRPS
R. S. Wiegman, PNNL
M. B. Wilson, HMIS
Administrative Record, H6-08 (TSD: H-0-1)
Environmental Portal, G3-35
Ecology NWP Library
HF Operating Record A3-02 (J. Perry, HMIS)

ATTACHMENT
21-ESQ-000467

HANFORD FACILITY NONCOMPLIANCE REPORT
FOR CALENDAR YEAR 2020

(2 pages including cover page)

Permit Condition (WA789000897)	Description of Noncompliance ^{1,2}	Causes ¹	Period of noncompliance, including dates and times ¹	If the noncompliance has not been corrected, identify the anticipated time expected to continue ¹	Steps taken or planned to reduce, eliminate, and prevent reoccurrence ¹
II.C	The permittee(s) were unable to meet WAC 173-303-330 personnel training requirements. In some cases, training was not provided per the frequencies specified in permittee dangerous waste training plans. Training was suspended due to the COVID 19 world-wide pandemic. Additionally, many employees were not provided with access to telework options and/or computer based training for a large portion of Calendar Year 2020. Consistent with other regulatory bodies (e.g. EPA) DOE granted temporary re-training frequency extensions.	COVID-19 world-wide pandemic	March 2020 through December 31, 2020	Training re-training frequency extensions are scheduled to be discontinued on January 31, 2021.	NA
II.O.1.a	General inspections for the 100, 200 East, 200 West, 300, and 400 areas were not performed in Calendar Year 2020.	COVID-19 world-wide pandemic	March 2020 through December 31, 2020	General inspections required under Condition II.O.1.a are scheduled to resume in Calendar Year 2021	NA

¹ Reporting criteria are derived from WAC 173-303-810(14)(g)

² “For Calendar Year 2020, the COVID-19 world-wide pandemic created exceptions to the normal reporting process for items contained in this report. These items are being reported multiple times through two separate processes. First, reporting is/was performed monthly through the COVID-19 Compliance Assistance Table. Second, reporting is being performed in this report (i.e., Non-Compliance Report).”