



STATE OF WASHINGTON
 DEPARTMENT OF ECOLOGY
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May 5, 2008

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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. John C. Fulton, President
 CH2M HILL Hanford Group, Inc.
 P.O. Box 1500, MSIN: H6-63
 Richland, Washington 99352

Re: Conditional Approval of the Updated *Temporary Waste Transfer Line Management Program Plan*, RPP-12711, Revision 3K, Approval of the Hose in Hose Transfer Line (HIHTL) Compliance Removal Schedule, and Resolution of Ecology's HIHTL Outstanding Notice of Violation (NOV)

References: See page 3

Dear Ms. Olinger and Mr. Fulton:

This letter:

- Conditionally approves the updated *Temporary Waste Transfer Line Management Program Plan*, RPP-12711, Revision 3K (Reference 1).
- Approves the HIHTL Compliance Removal Schedule (Enclosure 1 of Reference 2).
- Provides status of the United States Department of Energy-Office of River Protection's (USDOE-ORP) corrective measures required by NOV for "Unfit-for-Use" Hazardous Waste Tank System Components (per Washington Administrative Code [WAC] 173-303-640(7) and 40 CFR, 264.196, Subpart J) (Reference 4).

The Department of Ecology received the updated *Temporary Waste Transfer Line Management Program Plan*, RPP-12711, Revision 3K, in response to our May 14, 2007, request (Reference 4).

After several meetings, Ecology and USDOE-ORP agreed to a HIHTL waiver process that extends the service life of specific HIHTLs following the qualifications below:

1. No use of a HIHTL after 10 years, regardless of the storage time and field deployment or service lifetime.

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2. No operation of a HIHTL after three years without additional controls and constraints as detailed in the waiver process (Reference 5).
3. No extended use of a HIHTL that has not been certified "Fit-for-Use" by an independent qualified registered professional engineer (IQRPE). This assessment must include the entire configuration of the system, per WAC 173-303-640.

At a March 28, 2008, meeting between the Tank Farm Contractor and representatives from USDOE-ORP and Ecology, all Ecology comments and concerns derived from the last review of the updated *Temporary Waste Transfer Line Management Program Plan*, RPP-12711, Revision 3K, were resolved.

Ecology grants conditional approval of the updated *Temporary Waste Transfer Line Management Program Plan*, RPP-12711, Revision 3K, in anticipation of the incorporation of all comments into Revision 4 of the document. This conditional approval also applies to the satisfactory application of the waiver process to the current HIHTLs that are pending IQRPE certification for extension during the retrieval operations on the 244-CR Vault. We reserve final approval of the *Temporary Waste Transfer Line Management Program Plan*, RPP-12711, upon assuring the incorporation of all our comments in Revision 4.

We do not intend to approve each waiver process. We will review the process after the first group of HIHTLs scheduled for the extension/waiver is completed and approved by the IQRPE. If we determine that the waiver process needs modification, we expect USDOE-ORP to revise the process as necessary.

We received a proposed schedule for removal and disposal of expired HIHTLs enclosed with the "Quarterly Report for the Tank Farm Temporary Transfer Lines" and enclosures including the "HIHTL compliance schedule for removal of expired HIHTLs" (Reference 2) from USDOE-ORP. The recovery plan portion includes a detailed schedule that indicates when each expired HIHTL will be removed. The removal schedule maintains compliance with the updated *Temporary Waste Transfer Line Management Program Plan*, RPP-12711, Revision 3K (Reference 1).

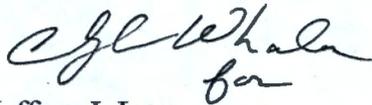
We would like to express our concern that the HIHTLs in the Waste Management Area C are not scheduled for removal until 2016. We request that USDOE-ORP ensure that the HIHTLs are removed in time to support the Tri-Party Agreement closure date and closure activities. With the noted concern, we have determined that the removal schedule is adequate and meets all of the requirements previously outlined in Reference 4, as modified during the technical meetings.

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We consider the NOV corrective measures complete at this time. Additional comments may need resolution when the waiver process is completed for the HIHTLs associated with the 244-CR vault retrieval and Revision 4 of the *Temporary Waste Transfer Line Management Program Plan*, RPP-127-11, is submitted.

If there are any questions, contact me at 509-372-7914.

Sincerely,



Jeffery J. Lyon
Tank Waste Storage Project Manager
Nuclear Waste Program

mm/aa

cc:	Corbun Babel, USDOE-ORP	Gabriel Bohnee, NPT
	Roger Quintero, USDOE-ORP	Russell Jim, YN
	Moses Jaraysi, CH2M	Susan Leckband, HAB
	Phillip Miller, CH2M	Ken Niles, ODOE
	Steve O'Toole, CH2M	Administrative Record: SST and DST
	Stuart Harris, CTUIR	Environmental Portal

References:

1. Letter 08-TPD-008, dated February 15, 2008, from S. J. Olinger, USDOE-ORP, to J. A. Hedges, Ecology, "Request for Approval of the Temporary Waste Transfer Line Management Program Plan"
2. Letter 07-TPD-062, dated December 11, 2007, from S. J. Olinger, USDOE-ORP, to J. A. Hedges, Ecology, "Quarterly Report for the Tank Farm Temporary Transfer Lines" 0074713
3. Letter 08-TPD-012, dated March 27, 2008, from S. J. Olinger, USDOE-ORP, to J. A. Hedges, Ecology, "Quarterly Report for the Tank Farm Temporary Transfer Lines" 00716590
4. Letter dated May 14, 2007, from B. Wilson, Ecology, to S. J. Olinger, USDOE-ORP, and M. S. Spears, CH2M HILL, "Notice of Violation for Unfit-For-Use Hazardous Waste Tank System Components" 0072876
5. Letter dated October 2, 2007, from J. J. Lyon, Ecology, to S. J. Olinger, USDOE-ORP, and J. C. Fulton, CH2M HILL, "Management and Use of Expired Hose in Hose Transfer Lines (HIHTLs)"