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Department of Energy

Richland Operations Office
P.O. Box 550
Richland, Washington 99352

91-EAB-093

MAY 6 1991



Mr. Charles E. Findley, Director
Hazardous Waste Division
U.S. Environmental Protection Agency
1200 Sixth Avenue
Seattle, Washington 98101

Mr. Timothy L. Nord, Project Manager
State of Washington
Department of Ecology
Mail Stop PV-11
Olympia, Washington 98504-8711

Dear Messrs. Findley and Nord:

PUREX STORAGE TUNNELS PART B PERMIT APPLICATION (TSD: S-2-1)

This letter transmits a Notice of Deficiency (NOD) response table and associated proposed revised text addressing the thirty-eight NOD comments received from the State of Washington Department of Ecology (Ecology) pertaining to the PUREX Storage Tunnels Part B Permit Application. This transmittal fulfills Ecology's request that a NOD response table be submitted on or before May 6, 1991.

If you have any questions regarding the enclosed NOD response table or associated proposed revised text, please contact Mr. C. E. Clark of the U.S. Department of Energy, Richland Operations Office on (509) 376-9333, or Ms. C. J. Geier of the Westinghouse Hanford Company on (509) 376-2237.

Sincerely,

E.A. Bracken

E. A. Bracken, Director
Environmental Restoration Division
Richland Operations Office

R.E. Lerch

R. E. Lerch, Manager
Environmental Division
Westinghouse Hanford Company

ERD:CEC



Enclosures:

1. NOD Response Table
2. Proposed Text Revisions

cc w/o encl.:

P. I. Day, EPA

R. E. Lerch, WHC

THE PUREX STORAGE TUNNELS
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NOD RESPONSE TABLE
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No.	Comment/Response	Concurrence
1.	<p><u>Forward, page iii, line 14.</u> The permit application states that storage of mixed waste is regulated under the <i>Resource Conservation and Recovery Act of 1976</i>. The handling and storage of mixed waste at the Hanford Reservation is also regulated by and will be permitted under the <i>Dangerous Waste Regulations</i>, Chapter 173-303 WAC.</p> <p><u>Ecology Requirement:</u> Edit the text accordingly.</p> <p><u>DOE-RL/WHC Response:</u> The text will be edited to include reference to the <i>Dangerous Waste Regulations</i>, Chapter 173-303 WAC.</p> <p><u>Proposed Revised Text:</u></p> <p><u>Forward, page iii, line 14 (revised).</u> "Handling and storage of the mixed (dangerous and radioactive) or the nonradioactive portion of the waste associated with the equipment is regulated under the <i>Resource Conservation and Recovery Act of 1976</i> and the <i>Dangerous Waste Regulations</i>, Chapter 173-303 Washington Administrative Code".</p>	
2.	<p><u>Forward, page iii, line 37.</u> Subpart X of 40 CFR 264 is referenced for a miscellaneous unit. The appropriate citation for the <i>Dangerous Waste Regulations</i> will be WAC 173-303-680, Miscellaneous Units.</p> <p><u>Ecology Requirement:</u> Revise the text to refer to the Washington Administrative Code here and other instances as appropriate.</p> <p><u>DOE-RL/WHC Response:</u> The text will be edited to include the cited reference to the Washington Administrative Code as appropriate.</p> <p><u>Proposed Revised Text:</u></p> <p><u>Forward, page iii, line 37 (revised).</u> "In this Part A revision, the PUREX Storage Tunnels have been redesignated a miscellaneous unit (Washington Administrative Code 173-303-680)."</p>	
3.	<p><u>Note:</u> Similar changes will be made throughout the permit application.</p> <p><u>Acronyms and Abbreviations, page vii.</u> The section on Acronyms and Abbreviations is too brief. It should be expanded to also include Definitions of terms subject to ambiguity (e.g., site vs. unit).</p> <p><u>Ecology Requirement:</u> Expand this section accordingly. Refer to the 616 Nonradioactive Dangerous Waste Storage Facility Part B Permit Application for guidance.</p>	

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DOE-RL/WHC Response: The Acronyms and Abbreviations section will be expanded to be similar to the A Definition Section, currently being developed for the Hanford Facility Permit. The PUREX Tunnels Part B definitions section, Section 1.4, will be developed in accordance with the content of the Hanford Facility Permit.

4. Page 1-1, line 35. The permit application states that there are 17 railcars stored in Tunnel Number 2 as of January 1, 1990. On page iii of the Forward, the permit application is stated to contain information available as of August 31, 1990. It does not seem reasonable that the number of railcars in this tunnel would not be known on a more current basis.

Ecology Requirement: State how many railcars are currently stored in the tunnels. Information regarding materials stored in these tunnels must be as current as possible. Revise the text as appropriate, here and elsewhere in the permit application.

DOE-RL/WHC Response: The permit application will be revised to specify the number of railcars stored in each of the tunnels as of January 1, 1991. Ecology will be notified of future increases or decreases in the number of railcars stored in the tunnels via the TSD facility annual dangerous waste report issued per WAC 173-303-390 (2).

Proposed Revised Text:

Forward, Page iii, line 35 (revised). "The PUREX Storage Tunnels Dangerous Waste Permit Application (Revision 0) consists of both a Part A and Part B permit application and is based on information as of January 1991."

Note: Similar changes will be made throughout the permit application.

5. Page 1-4, line 45. The permit application mentions clean closure. Ecology is current developing policy on closure standards for TSD units with mixed waste contamination. Guidance will be provided as soon as it is available.

DOE-RL/WHC Response: The policy regarding closure standards for TSD units with mixed waste will be incorporated into the permit application as appropriate when it becomes available. This policy will be discussed in association with the development of the Hanford Facility Permit.

6. Page 1-5, line 43. The permit application discusses permit modifications. The new version of the *Dangerous Waste Regulations* uses a different classification system for permit modifications and is considerably more extensive.

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Proposed Revised Text:

Chapter 4.0, Section 4.2.3 (revised).

4.2.3 Protection of Extremely Hazardous Waste in Containers [D-1c]

The amount of elemental lead, elemental mercury, and silver salts stored in the PUREX Storage Tunnels is sufficient to characterize this material as extremely hazardous waste. Because the PUREX Storage Tunnels are totally enclosed, protective covering from the elements and from run-on is provided for the storage of extremely hazardous waste. Periodic inspection of the equipment stored in the PUREX Storage Tunnels is not feasible because of radiation levels in excess of 5 roentgen per hour. Safe management of this waste is based on the following considerations.

- The operation of the PUREX Storage Tunnels is passive.
- The extremely hazardous waste is compatible with its storage container and the storage environment.

9. Page 4-9, line 31. Typographical Error: Milestone M-21-01 does not exist; the correct milestone should be M-22-01.
DOE-RL/WHC Response: Permit application text will be corrected accordingly.
10. Page 6-3, line 7. Typographical Error: "These are..." should be "There are..."
DOE-RL/WHC Response: Permit application text will be corrected.
11. Page 6-3, line 36. The permit application mentions dangerous waste signs.
Ecology Requirement: Describe these signs in detail.
DOE-RL/WHC Response: A detailed description of the signs will be added to the permit application.

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Proposed Revised Text:

Chapter 6.0, Section 6.1.1.3 (revised)

6.1.1.3 Warning Signs [F-1a(3)]. Warning signs are posted around the perimeter of the PUREX Facility. The signs are printed in English, legible from a distance of 25 feet, and visible from all angles of approach. Three types of signs are posted around the PUREX Facility and contain the following legends:

- No Trespassing. By Order Of The United States Department Of Energy
- Warning. This Area Patrolled By Police Dogs
- Notice. All Persons-Vehicles Subject To Search For Prohibited Articles.

Additionally, points of access to the PUREX Storage Tunnels are posted with the following warning signs: "DANGER Unauthorized Personnel Keep Out!" in accordance with the requirements of WAC 173-303-310(2)(a). The word DANGER is in large, white, block letters on a bright red background. The remaining lettering is black letters on a white background.

12. Page 6-3, line 37. Typographical Error: "...are in tact, visible..."

DOE-RL/WHC Response: Permit application text will be corrected.

Proposed Revised Text:

Chapter 6.0, page 6-3, line 37' (revised). "The point of access is inspected to ensure signs warning of dangerous waste are intact, visible, and legible.

13. Page 6-3, line 42. The permit application states "...verification is conducted by observing an indicator light and a pressure differential gage located in the PUREX Plant operating records." This does not make sense; the instruments would not be located in the operating records.

Ecology Requirement: Clarify what was meant by the above quoted statement. Revise the text as necessary.

DOE-RL/WHC Response: Permit application text will be revised.

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Proposed Revised Text:

Chapter 6.0, page 6-3, line 42 (revised). "This verification is conducted by observing an indicator light and a pressure differential gage located in the PUREX Plant Power Control Room."

14. Page 6-6, line 1. The permit application states that water will not be used for fire control at the PUREX Storage Tunnels.

Ecology Requirement: Describe what fire controls measures would be used in the event of a fire.

DOE-RL/WHC Response: A description of fire control procedures will be included in the permit application.

Proposed Revised Text:

Chapter 6.0, Section 6.3.1.4 (revised).

6.3.1.4 Water for Fire Control [F-3a(4)]. The fire hazard associated with the operation of the PUREX Storage Tunnels is considered to be very low due to the minimal amount of combustibles stored within the tunnels and the lack of an ignition source (Rambosek, 1972). In the event of a fire in the storage area of the tunnels the contingency plan will be activated. Due to the leachable characteristic of the dangerous waste stored within the tunnels, water will not be used for fire control. Reduction of the air supply to the storage area by isolation of the tunnel exhaust system should permit the fire to self extinguish. Should the fire continue to propagate, heavy equipment and cranes will be called to the scene to cover areas of the tunnels that may collapse.

15. Page 6-6, line 43. Control of run-off is described, however, this description actually discusses run-on. Both run-on and run-off must be discussed.

Ecology Requirement: Revise the text accordingly.

DOE-RL/WHC Response: Permit application text will be revised to provide discussions of both run-on and run-off.

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Proposed Revised Text:

Chapter 6.0, page 6-6, section 6.4.2 - Run-Off (revised)

The design of the PUREX Storage Tunnels included consideration and provisions for the control of run-on. Construction of both tunnels included the application of a moisture barrier before placement of the soil overburden. On Tunnel Number 1, 90-pound mineral surface roofing (tarpaper) was applied to the external surfaces of the structural timbers (top and sides). The roofing material was nailed in place with an overlap of approximately 4 inches at all joints and seams. All interior and exterior steel surfaces of Tunnel Number 2 were coated with a 35-mil bituminous, solvent coal tar base, coating compound. The coating was applied using a two-coat system, with each coat not less than 18 mils, ensuring a total dry film thickness of not less than 35 mils.

The soil overburden covering the PUREX Storage Tunnels also is contoured to provide a side slope of 2 (horizontal) to 1 (vertical). This construction serves to divert any seasonal or unanticipated run-on away from the storage area of the PUREX Storage Tunnels. Periodic inspections of the tunnel side slopes are conducted to ensure the contours remain in a condition that will preclude ponding and continue to divert run-on away from the tunnel storage areas. Further discussion of the design of the PUREX Storage Tunnels is provided in Chapter 2.0, Section 2.1.4.

Run-off at the PUREX Storage Tunnels is controlled by the design features of the tunnels exterior which serve to divert run-on away from the interior of the tunnels. Additionally, all waste within the tunnels is stored well above the floor level on railcars. The control of run-on combined with the storage of all waste above the floor elevation provides adequate assurance that run-off will not occur at the PUREX Storage Tunnels.

16. Page 6-7, line 42. Backup or redundant systems are not provided for the ventilation system in Tunnel 2.

Ecology Requirement: Provide information on the hazards due to failure of the ventilation system.

DOE-RL/WHC Response: The discussion of the ventilation system for Tunnel 2 will be expanded to address hazards associated with failure of the system.

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Proposed Revised Text:

Chapter 6.0, page 6-7, section 6.4.4.2 (revised). Electrical power is required to operate the water-fillable doors and the ventilation fan in Tunnel Number 2. Backup or redundant systems are not provided, as failure of the equipment would not have the potential to result in a release of dangerous waste to the environment.

There are no hazards associated with the shutdown of the tunnel ventilation system due to loss of electrical power or as a result of a mechanical failure. Back-up or redundant systems are not provided as the system is operated only to maintain air balance and provide secondary control of radioactive airborne particulate. In the event the Tunnel number 2 ventilation system shuts down a reversal of airflow occurs, redirecting the airflow to the PUREX Canyon ventilation system. The PUREX canyon ventilation system is filtered and is equipped with a steam-driven emergency exhaust fan for back-up in the event of an electrical power failure.

17. Page 6-8, line 9. A full faced respirator is mentioned. It is not clear if this is a supplied air or purifying air respirator.

Ecology Requirement: Clarify what type of respirator is used.

DOE-RL/WHC Response: Types of respirators used will be specified in the permit application.

Proposed Revised Text:

Chapter 6.0, page 6-8, section 6.4.5 (revised). ... a cloth cap and hood, and a full face air respirator equipped with a high-efficiency particulate air filter. Such equipment is also considered to be sufficient protection from the dangerous waste stored within the PUREX Storage Tunnels.

18. Page 7-1, line 14. USDOE/RL states that parts of the contingency plan serve to fulfill requirements other than Ecology's. Ecology agrees that sections of the documents not subject to regulation by Ecology should be excluded from the permit(s). Any part(s) of submitted documents not applicable to the permit application will not be adopted as part of the permit and therefore will not be subject to the modification requirements of WAC 173-303-830.

Ecology Requirement: Documents submitted for the permit which contain extraneous information should be accompanied by a cover letter indicating which chapter(s) or section(s) are applicable to the permit application, or, conversely, should be excluded.

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DOE-RL/WHC Response: This comment will be resolved in accordance with the development of the Hanford Site Facility Permit. The PUREX Tunnels Part B will be revised in accordance with the content of the Hanford Facility Permit.

19. Page 11-1, line 38. The plan states that closure of the PUREX Tunnels will be performed in conjunction with the 200-PO-1 and 200-PO-2 operable units. Closure must be performed in compliance with WAC 173-303-610(4).

Ecology Requirement: Revise the closure plan accordingly.

DOE-RL/WHC Response: The closure plan will be revised to include the cited reference.

Proposed Revised Text:

Chapter 11.0, Section 11.0 (revised).

11.0 CLOSURE AND POSTCLOSURE REQUIREMENTS [1]

This chapter presents the closure plan for the PUREX Storage Tunnels. Closure will comply with WAC 173-303-610 regulations for the closure of dangerous waste facilities. The PUREX Storage Tunnels are used only for the storage of equipment and materials removed from the PUREX Plant. Detailed records are maintained of all materials (both dangerous waste and non-dangerous waste) which are stored within the tunnels. As a controlled storage unit with limited dangerous waste storage (lead, mercury, and silver salts), the PUREX Storage Tunnels are not anticipated to become extensively contaminated by dangerous waste (the use of the word contaminated refers to contamination by dangerous waste regulated by Ecology). All equipment and material stored at the waste management unit is stored in a retrievable manner on railcars; therefore, the closure approach will be clean closure. Consistent with the criteria that must be met to clean close a facility, no post-closure activities will be necessary. This chapter describes the performance standard that will be met and closure activities that will be conducted to achieve clean closure in accordance with WAC 173-303-610 requirements.

20. Page 11-1, line 46. The closure plan states that closure will take place after removal of the stored equipment and that the removal will be performed in conjunction with, "the final disposition of equipment from the PUREX Plant. A common equipment disposal method will be established as part of the PUREX Facility closure." Removal of the equipment is part of the closure of the PUREX Tunnels.

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Ecology Requirement: Revise the text to accurately reflect the closure process. Note also that the PUREX Facility Part B Permit Application scheduled to be submitted in September 1992 must allow for removal of mixed waste from the tunnels to the canyon area and contain the proposed treatment discussed in this permit application's closure plan.

DOE-RL/WHC Response: Chapter 4.0 will be revised to allow for the transfer of railcars into and out of the Tunnels as part of normal operations. Chapter 11.0 will be revised to indicate that closure will take place after all equipment is removed from the tunnels. The text will be clarified to indicate that removal of the equipment from the railcars and subsequent treatment will be addressed in the PUREX Plant Part B once details and engineering are available.

Proposed Text Changes:

Chapter 11.0, Section 11.1 (revised),

11.1 CLOSURE PLAN [I-1]

Because of the high radiation levels associated with the equipment stored within the PUREX Storage Tunnels, an engineering study (Appendix 11A) was conducted to evaluate different strategies for closure of the waste management unit. This engineering study considered two categories of disposal alternatives: (1) clean closure of the storage tunnels following retrieval of all stored equipment and materials, and (2) in situ disposal. The results of the engineering study indicated that the preferred course of action is clean closure, using the alternative involving the retrieval, processing in the PUREX Plant, and disposal at appropriate disposal unit. A no action alternative was not considered viable within the regulatory framework governing the disposal of the equipment. If clean up to background threshold levels is not achievable, then health-based standards derived from the Model Toxics Control Act (MTCA), WAC 173-340, will be evaluated for use as action levels.

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Proposed Revised Text:

Chapter 11.0, Section 11.1.1, (revised).

11.1.1 Closure Performance Standard [I-1a]

This section describes the performance and/or removal or decontamination standards to be applied to the PUREX Storage Tunnels.

11.1.1.1 Performance Standard [I-1a(2)]. This plan has been developed to close the PUREX Storage Tunnels in a manner that meets the following closure performance standards of WAC 173-303-610(2)(a).

- Minimize the need for future maintenance.
- Control, minimize, or eliminate to the extent necessary to protect human health and the environment, the postclosure escape of dangerous waste, dangerous constituents, leachate, contaminated run-off, or dangerous waste decomposition products to the ground, surface water, groundwater, or atmosphere.
- Return the land to the appearance and use of surrounding land areas to the degree possible given the nature of the dangerous waste activities.

The performance standards can be achieved through identification and evaluation of contamination based on soil baseline levels; health-based environmental standards; type, extent, and significance of contamination; and remedial action standards that provide for achievable cost and benefit protection of the environment and human health.

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In general, these standards will be achieved by removing, to background levels or regulatory thresholds, dangerous waste from the unit and decontaminating or removing all equipment, structures, soils, or other materials containing or contaminated with dangerous waste or waste residue. If background threshold levels are not obtainable then health-based, MTC derived, standards will be used.

11.1.1.2 Removal or Decontamination Standard [I 1a(1)]. Prior to the initiation of closure, equipment containing dangerous waste will be retrieved for separation, processing, and treatment before disposal in an appropriate unit. Should decontamination be necessary, as determined by authoritative sampling, all materials contaminated with dangerous waste will be removed and disposed of [WAC 173-303-610(2)(b)].

Samples will be obtained from the gravel and soil materials from the floors of the tunnels to ensure that the environment has not been contaminated by the equipment storage operations. Should contaminants be detected above appropriate threshold, background or health-based values, the gravel and soil will be excavated to a depth where dangerous waste constituents are equal to or below the appropriate threshold values. Soil concentration levels will be established by soil sample analytical methods specified in SW-846 (EPA 1986) or an equivalent method.

Background threshold concentrations and significance levels will be based on information including mean concentrations and variance for each constituent of concern. Specific approaches and the criteria and assumptions implicit in establishing concentration levels that constitute significant deviation from background or other control levels will be consistent with the outcome of background discussions currently underway with Ecology and the EPA. Background sampling will be done at the time of closure.

22. Page 11-4, line 7. The plan states, "No partial closure is anticipated for the PUREX Storage Tunnels."

Ecology Requirement. Discuss the statement with regard to the conclusion of RHO-CD-1076 (September 1980, G. R. Silvan), which states on page 33, "if the contents of the tunnel must be removed, it should be deactivated as soon as possible to ensure the tunnel is still structurally sound during the removal operation."

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DOE-RL/WHC Response: Although no partial closure of the PUREX Storage Tunnels is anticipated, the structural integrity of Tunnel Number 1 has been questioned (Silvan 1980). To resolve this issue, an assessment of structural integrity is being conducted. Should the assessment of Tunnel Number 1 determine that closure of the tunnel is warranted, a partial closure of the waste management unit will be initiated. Closure of Tunnel Number 1, i.e. partial closure of the waste management unit, would not affect the operation of Tunnel Number 2. Closure of Tunnel Number 1 would be performed in accordance with the established closure plan.

23. Page 11-4, line 37. Minor modifications to the permit in accordance with WAC 173-303-830(4) to the permit are discussed. WAC 173-303-830 is being revised significantly in the next version of the *Dangerous Waste Regulations*.

Ecology Requirement: Revise the text to be in accordance with the next version of the *Dangerous Waste Regulations* which will be in place at the time of permit issuance.

DOE-RL/WHC Response: The text will be revised to address the most current requirements for permit modifications.

Proposed Revised Text:

Chapter 11.0, Section 11.1.3, (revised).

11.1.3 Maximum Waste Inventory [I-1c]

The eight railcar capacity for Tunnel Number 1 was reached in January 1965. The combined volume of equipment stored on the eight railcars in Tunnel Number 1 is approximately 780 cubic yards.

As of January 1, 1991, the combined volume of equipment stored on the 17 railcars in Tunnel Number 2 is approximately 1,780 cubic yards. Tunnel Number 2 has a maximum storage space of 40 railcars. Based on projections for future equipment storage, it is anticipated that another 16 railcars of equipment will be stored in Tunnel Number 2 before PUREX Plant closure.

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24.	<p>Because of the limitations in projecting the types of equipment to be stored in the future and the amount to be placed on the railcars, the total volume of equipment in storage at any one time is uncertain. The maximum volume of waste to be stored within Tunnel Number 2 is estimated to be approximately 3,500 cubic yards. This estimate assumes the average volume of equipment presently stored on the railcars will be representative of the average volume of equipment on the 16 railcars anticipated to be placed in the tunnels in the future. Assuming the 16 railcars anticipated to be placed into storage contain the same fraction of mixed waste as the railcars presently stored in the PUREX Storage Tunnels, an additional 4,220 pounds of lead, 1,100 pounds of silver, and 200 pounds of mercury will be placed into the tunnels. This will bring the maximum total inventory of mixed waste in storage in the PUREX Storage Tunnels to an estimated 14,000 pounds.</p> <p><u>Page 11-5, line 37.</u> The removal of the stored inventory is discussed. No mention is made of how it will be determined that no additional mixed waste exists in or on these failed equipment parts and railcars.</p> <p><u>Ecology Requirement:</u> Discuss how it will be established that the inventory not known to contain mixed waste does not contain mixed waste.</p> <p>DOE-RL/WHC Response: Identification and separation of the mixed waste from the equipment will be addressed in the PUREX Plant Part B Permit Application when details become available.</p>	
25.	<p><u>Page 11-6, line 26.</u> The plan states that a radiation survey will be initiated well in advance of PUREX Storage Tunnels Closure.</p> <p><u>Ecology Requirement:</u> State when this investigation is scheduled to begin. Include details such as time frames for technology development.</p> <p>DOE-RL/WHC Response: The details associated with removal of railcars from the tunnels have been removed from Chapter 11.0 and added to Chapter 4.0. The reference to an overall radiation survey has been deleted.</p>	
26.	<p><u>Page 11-11, line 33.</u> The professional engineer certification is not consistent with other closure plans.</p> <p><u>Ecology Requirement:</u> Revise the certification statements so that it is consistent with other closure plans. Refer to the 183-H Solar Evaporation Basins Closure Plan for guidance.</p> <p>DOE-RL/WHC Response: The closure plan certification statement will be revised to be consistent with the outcome of discussions associated with development of the Hanford Facility Permit.</p>	

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27.	<p><u>Page 11-12, line 33.</u> The closure plan states that because this is a federal facility, the closure cost estimate is not required.</p> <p><u>Ecology Requirement:</u> The application must state that closure cost estimates will be provided by October 1, 1991, and will be updated annually thereafter. These estimates are being required under the facility reporting requirements of WAC 173-303-390. At this time, Ecology is not requiring that these estimates be provided as part of the financial requirements under WAC 173-303-620. However, these estimates must be provided in the same level of detail that is required for the purpose of the financial requirements.</p> <p><u>DOE-RL/WHC Response:</u> The permit application will be revised to indicate that closure cost information will be provided as part of the annual reporting requirements of WAC 173-303-390. The schedule for initial submittal of projections of anticipated costs will be established as part of discussions associated with the development of the Hanford Facility Permit.</p> <p><u>Proposed Text Changes:</u></p> <p><u>Chapter 11.0, Section 11.4 (revised)</u></p> <p>11.4 CLOSURE COST ESTIMATE [I-4]</p> <p>Closure cost estimates are not required for federal facilities as stated in WAC 173-303-620. However, projections of anticipated closure costs will be provided and updated in an annual report submitted to Ecology.</p>	
28.	<p><u>Page 12-1.</u> The Dangerous Waste Regulations are in the process of being revised.</p> <p><u>Ecology Requirement:</u> Ensure that the reporting and record-keeping requirements of the new revision will be met.</p> <p><u>DOE-RL/WHC Response:</u> The text will be revised to address the most current requirements for spill reporting.</p> <p>The requirements will be incorporated once they become available.</p>	
29.	<p><u>Page 12-4, line 32.</u> Ecology is in the process of developing consistent spill reporting requirements. These requirements will be formally provided to USDOE/RL as soon as possible. In any case, reports should be made to Ecology's Kennewick office, (509) 546-2977.</p> <p><u>Ecology Requirement.</u> Revise the contingency plan accordingly.</p>	

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	<p>The requirements will be incorporated once they become available.</p>	
30.	<p><u>Appendix 7A, page 1.</u> The emergency plan mentions DOE-RL Procedures Manuals. <u>Ecology Requirement:</u> Describe these manuals further.</p>	
	<p>DOE-RL/WHC Response: DOE-RL procedures manuals will be described in the text.</p>	
	<p><u>Proposed Revised Text:</u></p>	
	<p><u>Appendix 7A, page 1, (revised).</u></p>	
	<p>"...and Procedures Manuals, the WHC Emergency Plan (WHC-CM-4-1) and this document. The DOE-RL Procedures Manuals contains procedures for use by DOE-RL and contractor personnel for response to declared emergencies on the Hanford Site and affecting DOE-RL property and facilities.</p>	
	<p>The DOE-RL Procedures Manual includes the following:</p>	
	<ul style="list-style-type: none">o Notification procedure for activation of DOE-RL personnel and resourceso Operation of the DOE-RL Emergency Centero Operation of the Hanford Unified Dose Assessment Centero Procedure for closure of the Columbia Rivero Recovery, re-entry, and post accident operations procedureo Bomb threat procedureo Civil disturbances response procedureo Terrorist threat response procedureo Fire response procedureo Extraordinary conditions response procedure (Weather Emergencies)o Public Affairs and Joint Information Center procedureo Emergency phone numbers listing.	
	<p>Copies of the existing ..."</p>	
31.	<p><u>Appendix 7A, page 3.</u> Figure 1.b of the 200 East Area is illegible.</p>	

9 1 1 2 1 7 1 0 4 6

THE PUREX STORAGE TUNNELS
PART B PERMIT APPLICATION
NOD RESPONSE TABLE
(with Proposed Revised Text)

Attachment 1
May 6, 1991
Page 18 of 21

No.	Comment/Response	Concurrence
32.	<p><u>Ecology Requirement:</u> Provide a legible copy.</p> <p>DOE-RL/WHC Response: All figures in Appendix 7A will be reviewed. Legible copies will be provided where needed in the next revision of the emergency plan.</p> <p><u>Appendix 7A, page 14.</u> Document number WHC-IP-0603 is referenced on the Building Emergency Review Checklist.</p>	
33.	<p><u>Ecology Requirement:</u> Describe this document and provide a copy under with the next NOD Response Table.</p> <p>DOE-RL/WHC Response: The Building Emergency Plan Review Checklist, form 54-6000-369, is a form used at the Hanford Site to record training completion at both hazardous and non-hazardous units. The two documents referenced on the checklist as WHC-IP-0263-(), applicable to hazardous units, and WHC-IP-0603-(), applicable to non-hazardous units, describe the type of emergency plan which is applicable and reviewed. Because the PUREX Facility is categorized as a hazardous unit, WHC-IP-0603 is not applicable. Because WHC-IP-0603 is not applicable, further discussion is not considered appropriate.</p> <p><u>Appendix 7A, page 16.</u> The HMRT is referred to by acronym only.</p> <p><u>Ecology Requirement:</u> Acronyms should be avoided in this type of document and the minimum should be spelled out in the first usage.</p> <p>DOE-RL/WHC Response: The text will be revised to define the acronym. Additionally, the next revision of the Emergency Plan will include an acronyms list.</p>	
34.	<p><u>Proposed Revised Text:</u></p> <p><u>Appendix 7A, Section 3.02 (revised)</u></p> <p>In cases involving soil contamination, sampling must be performed to determine the lateral and vertical extent of contamination. The BED is responsible for coordinating onsite characterization activities which will be performed by Hanford Site organizations, and the Hazardous Material Response Team (HMRT) who are trained.....</p> <p><u>Appendix 7A, page 31.</u> DOE-RL Order 5484.1 is referenced.</p> <p><u>Ecology Requirement:</u> Provide a copy of this order.</p>	

THE PUREX STORAGE TUNNELS
PART B PERMIT APPLICATION
NOD RESPONSE TABLE
(with Proposed Revised Text)

No.	Comment/Response	Concurrence
	DOE-RL/WHC Response: A copy of DOE-RL Order 5484.1 is attached to the NOD Response Table (Attachment A).	
35.	<p><u>Appendix 7A, page 103.</u> The emergency equipment list is incomplete and does not give the locations of the emergency equipment. (The referenced map is illegible).</p> <p><u>Ecology Response:</u> Provide a comprehensive inventory with specific amounts and locations of equipment as required by WAC 173-303-350.</p>	
36.	<p>DOE-RL/WHC Response: An emergency equipment list identifying specific amounts and locations of equipment will be incorporated into the emergency plan in the next revision. The requested inventory of emergency equipment is attached to the NOD response table (Attachment B).</p> <p><u>General Comment.</u> The MSDS states an Ecology reportable quantity. Ecology is currently developing a spill reporting policy. This will be provided to USDOE as soon as it is available.</p> <p>DOE-RL/WHC Response: The MSDS will be removed from the emergency plan. Reference will be made to the location of the MSDS files in the next revision of the emergency plan.</p>	
37.	<p><u>Appendix 11A, page 11.</u> It is assumed that the closure activities for the PUREX Storage Tunnels will occur in conjunction with the closure activities for the PUREX Plant. This may be appropriate for Tunnel 2, but Tunnel 1 was found to be of adequate but questionable integrity in 1980.</p> <p><u>Ecology Requirement:</u> Evaluate the assumption that both tunnels will be closed in conjunction with the PUREX Plant, Demonstrate that postponing closure of Tunnel 1 will not result in a more difficult closure due to failure of the timbers. Refer to the second paragraph of page 11A-16.</p>	
38.	<p>DOE-RL Response: An assessment of structural integrity of Tunnel Number 1 has been initiated. Should the results of the assessment indicate unacceptable risk associated with continued operation of Tunnel Number 1, the tunnel will be closed.</p> <p><u>Appendix 11A, Page 42.</u> The weighting factors included in the evaluation of closure options do not accurately reflect the ordering cited in the text. For example, the text states, "Personnel protection was considered to be the most important item overall (ALARA evaluation and industrial health and safety) followed by compliance with the present regulatory framework." However, the weighting factors assigned were the same for ALARA evaluation and regulatory acceptability (4.0) and smallest overall for industrial health and safety (1.5). Furthermore, on page 11.A-56 it states, "determination of a preferred alternative will be based on regulatory acceptability..."</p>	

THE PUREX STORAGE TUNNELS
 PART B PERMIT APPLICATION
 NOD RESPONSE TABLE
 (with Proposed Revised Text)

Attachment 1
 May 6, 1991
 Page 20 of 21

No.	Comment/Response	Concurrence
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Ecology Requirement: Correct those inconsistencies and the evaluation of closure alternatives to accurately reflect the stated criteria ordering.

DOE-RL/WHC Response: Inconsistencies in the engineering evaluation will be corrected.

Proposed Revised Text:

Appendix 11A, Section 5.1, (revised)

5.1 CRITERIA

Eight disposal concepts for the equipment were considered for this study. An evaluation matrix was used to compare the alternatives and arrive at a preferred alternative for disposal of the equipment. The matrix consisted of seven criteria for comparison of the alternatives. The criteria are ALARA evaluation, regulatory acceptability, cost, potential for negative environmental impact (short-term), availability of technology, packaging/transportation feasibility, and industrial health and safety. Each criterion was assigned a weighting factor to indicate relative importance. Personnel protection was considered to be the most important item with an overall weighting factor of 5.5 [ALARA evaluation (4.0) plus industrial health and safety (1.5)]. Compliance within the present regulatory framework (regulatory acceptability) was considered the next most important. Potential for environmental releases, which can be remediated during the alternative, costs (capital and annual), technology availability, and packaging/transportation feasibility follow in order of importance. The following criteria and associated weighting factors demonstrate the importance of each criterion:

THE PUREX STORAGE TUNNELS
 PART B PERMIT APPLICATION
 NOD RESPONSE TABLE
 (with Proposed Revised Text)

Attachment 1
 May 6, 1991
 Page 21 of 21

No.Comment/ResponseConcurrence

<u>Criterion</u>	<u>Weighting Factor</u>
ALARA evaluation	4.0
Regulatory acceptability	4.0
Short-term environmental impact	3.5
Costs	3.0
Technology availability	2.0
Packaging/transportation feasibility	2.0
Industrial health and safety	1.5

6.0 CONCLUSIONS AND RECOMMENDATIONS

In the proposed alternatives evaluation found in section 5.0, each alternative was ranked according to selected criteria. Table 9 summarizes the weighted scores for each alternative.

Three alternative scores are ranked closely. The three highest ranked alternatives are in situ grout injection, retrieval/disposal in the PUREX Plant, and retrieval/process in the PUREX Plant. A comparison of these alternatives, according to the above mentioned criteria, is found below.

The PUREX Storage Tunnels
Part B Permit Application
NOD Response Table
(with Proposed Revised Text)

ATTACHMENT A

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COPY

9-26-83

SUBJECT: ENVIRONMENTAL PROTECTION, SAFETY, AND HEALTH PROTECTION INFORMATION
REPORTING REQUIREMENTS

1. PURPOSE. To supplement DOE 5484.1, ENVIRONMENTAL PROTECTION, SAFETY AND HEALTH PROTECTION INFORMATION REPORTING REQUIREMENTS, of 2-24-81, and to assign additional requirements and responsibilities for implementation at the Richland Operations Office (RL). Additional reporting requirements are to be found in DOE 5484.2, UNUSUAL OCCURRENCE REPORTING SYSTEM, of 8-13-81; RL 5484.2, UNUSUAL OCCURRENCE REPORTING SYSTEM FOR RL, of 8-23-83; and DOE directives in the 5500 series concerning emergency planning, preparedness and response.
2. CANCELLATION.
 - a. MSI 78-6, Rev. 1, CONTROL OF POST-ACCIDENT EVENTS AT HANFORD, of 12-15-78.
 - b. RL 0502, NOTIFICATION, INVESTIGATION AND REPORTING OF OCCURRENCES, of 6-29-78.
3. SCOPE. The provisions of this Order are applicable to RL, RL contractors, and their subcontractors.
4. REFERENCES.
 - a. Executive Order (E.O.) 12088, of 10-13-78, which ensures Federal compliance with applicable pollution control standards.
 - b. DOE 5484.2, UNUSUAL OCCURRENCE REPORTING SYSTEM, of 8-13-81, which provides criteria for reporting unusual occurrences.
5. CONTRACTOR NOTIFICATION REQUIREMENTS. A summary of RL contractor notification, investigation and reporting requirements applicable to this Order is included as Attachment 1.

Alex G. Fremling
Manager

DISTRIBUTION:

RL Office and Division Directors
and Branch Chiefs
All Contractors

INITIATED BY:

Safety and quality Assurance
Division

RL 5484.1
9-26-83

Attachment 1
Page 3 (through 6)

SUMMARY OF RL CONTRACTOR NOTIFICATION, INVESTIGATION
AND REPORTING REQUIREMENTS CHART

(SEE HARD COPY)

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CHAPTER I

NOTIFICATION OF OCCURRENCES:

RESPONSIBILITIES AND AUTHORITIES

1. SAFETY AND QUALITY ASSURANCE DIVISION (SQA) shall:
 - a. Maintain duty officer system for 24-hour coverage. The SQA duty officer, upon notification of an occurrence by the Patrol Operation Center (POC) or contractor, will notify RL program divisions or offices in accordance with established procedures, and RL upper management as appropriate.
 - b. Provide the RL Manager (MGR) with prompt and accurate information as to the severity of an accident and the type of investigation required.
 - c. At the direction of the MGR, send an RL representative to the scene to ensure that, consistent with the need for rescue, first aid, and prevention of additional accidents, all necessary steps are taken to "freeze" the scene of the accident. The purpose of this action is to prevent the disturbance of physical evidence which may be important to the subsequent investigation.
 - d. At the direction of the MGR, notify the Office of Operational Safety, Headquarters (EP-HQ), on FTS 233-5555. The confirming teletype to EP-HQ will be prepared by SQA for the MGR's signature. Copies will be provided to HQ offices as specified in DOE 5484.1A, Chapter II.
 - e. Notify local, state, and Federal Agencies of the occurrence, when required. Notification shall be made on a case-by-case basis and shall be at the direction of the MGR.
2. PUBLIC AFFAIRS OFFICE (PAO) shall prepare and release public statements on occurrences, subject to the approval of the MGR. In some cases this responsibility may be delegated to the event contractor. Such decisions will be made on a case-by-case basis, and are subject to the approval of the MGR.
3. RL CONTRACTORS shall, as a minimum, make oral notification to the appropriate RL program division or office, to PAO, and to SQA or the SQA duty officer as soon as it is apparent that an incident may meet the criteria of a Type A or B occurrence. Requirements for notification of these and other occurrences are specified in Attachment 1 (See page 3 of this Order).

CHAPTER II
INVESTIGATION REQUIREMENTS

1. MANAGER OF RL. Following RL staff review of the Board of Investigation (Board) report, the Manager (MGR) shall:
 - a. Provide a copy of the report, the Board recommendations and any additional recommendations to the responsible RL program division or office for action and followup through the appropriate Assistant Manager (AM).
 - b. Provide copies of the report and all recommendations to the Safety and Quality Assurance Division (SQA), through the Assistant Manager for Safety, Safeguards and Quality Assurance (AMS), for transmittal to DOE Headquarters (HQ).
2. CHAIRMAN OF THE RL BOARD OF INVESTIGATION shall:
 - a. Convene the Board, proceed with the investigation, and prepare the report to be transmitted to the MGR. The investigation will be conducted and the report will be prepared in accordance with ERDA 76-20, Accident/Incident Investigation Manual.
 - b. Provide SQA with all backup material relative to the investigation and its report for retention.
3. SAFETY AND QUALITY ASSURANCE DIVISION (SQA) shall:
 - a. Recommend to the MGR the classification of an occurrence and the type of investigation to be conducted.
 - b. Recommend to the MGR the membership of the Board and its Chairman for an occurrence to be investigated as a Type A or B.
 - c. Prepare letters to the Chairman of the Board and to the event contractor for the MGR's signature, establishing the membership of the Board and special instructions.
 - d. Prepare for the MGR's signature a memorandum transmitting the investigation reports and the Board's recommendations to HQ offices as specified in DOE 5484.1, Chapter II.
 - e. Maintain the official file of correspondence initiated by RL relative to the report and corrective actions on the recommendations.

- f. Distribute copies of the report to other RL contractors, the public reading room, and offsite as appropriate.
 - g. Prepare a letter to EP-HQ for the AMS signature, officially closing the investigation file when all corrective actions have been completed.
4. RL PROGRAM DIVISION OR OFFICE shall:
- a. Transmit the final report and appropriate/applicable recommendations to the event contractor for corrective action.
 - b. Followup with the contractor to assure that corrective actions are adequate and complete.
 - c. Provide SQA with a quarterly status report on the recommendations and officially notify SQA when all corrective actions have been completed.
5. RL BUDGET DIVISION shall identify as applicable and as available funds to support occurrence investigation and reporting requirements.
6. RL FINANCE DIVISION shall provide the Chairman of a DOE Accident Investigation Board with a cost code for charging necessary investigation and reporting expenses.
7. CONTRACTOR shall:
- a. Investigate occurrences in accordance with DOE 5484.1 when directed by the MGR to conduct a Type A or B investigation. The investigation and report shall be in accordance with ERDA 76-20.
 - b. Maintain a file of material relative to the investigation and its report.

CHAPTER IV

ENVIRONMENTAL PROTECTION, SAFETY, AND HEALTH PROTECTION REPORTS

RL CONTRACTOR REQUIREMENTS

1. IMMEDIATE NOTIFICATION REQUIREMENTS. In addition to the notification and reporting requirements contained in Attachment 1 (see page 3) of this Order, RL contractors are required to verbally notify responsible SQA environmental protection officials within 24 hours of becoming aware of any of the following occurrences:
 - a. Any violation of applicable Federal, state, or local pollution control standards and requirements established pursuant to (but not limited to) the environmental protection statutes referred to in Section 1-102 of Executive Order 12088.
 - b. Any noncompliance with the terms and/or conditions of an existing National Pollutant Discharge Elimination System (NPDES) permit, Prevention of Significant Deterioration (PSD) permit or any other environmental protection-based permit, or formal agreement with an applicable regulatory body.
 - c. Any gaseous or liquid radiological effluent releases which exceed DOE requirements and/or contractor specific radiological release concentration guides.
2. REPORTS. Following the 24-hour verbal notification of occurrences specified in paragraph 1 of this Chapter, an Unusual Occurrence Report will be submitted according to procedures in DOE 5484.2.
3. RL CODING INSTRUCTION. For those occurrences specified in Attachment 1 of this Order which require the completion of DOE F 5821.1 (Attachment 15 of DOE 5484.1), the following is to be used for completing SECTION 0 of the form.
 - a. Column 4 - Contractor alphabetical designations:
 - Rockwell Hanford Co. - A
 - Battelle - Pacific Northwest Laboratory - B
 - Hanford Environmental Health Foundation - H
 - J. A. Jones Construction Services Co. - J

UNC Nuclear Industries, Inc. - D

Westinghouse Hanford Co. - W

- b. Column 5 - Alphabetical designations for the main Areas:
- | | |
|----------------|----------------|
| 100-B Area - B | 200-E Area - E |
| 100-D Area - D | 200-W Area - W |
| 100-F Area - F | 300 Area - L |
| 100-H Area - H | 400 Area - T |
| 100-K Area - K | 600 Area - C |
| 100-N Area - N | 700 Area - A |
| | 1100 Area - S |

- c. Column 6 - Alphabetical designations for facilities within the main areas shall be designated by the operating contractor.

- d. Columns 7-9 - Three (3) spaces are allowed for map numbers. The map numbers shall be designated by each contractor and be within the assigned number series listed for release points. Maps should be 8 1/2 x 11" if possible.

- e. Columns 10-12- Each contractor is assigned a number series for release points as follows:

UNC Nuclear Industries, Inc.	001 to 025
Battelle - Pacific Northwest Laboratory	026 to 075
Westinghouse Hanford Co.	076 to 150
Rockwell Hanford Co.	151 to 600

Other contractors will be assigned individual release point numbers as required by the Chief, Radiological and Environmental Safety Branch, SQA.

FIRE EXTINGUISHERS

Operations Inspection Frequency: Monthly

<u>Station Number</u>	<u>Location</u>	<u>Type</u>
1	PUREX Main Lobby by Door 60	Halon
2	Dispatcher's Office	Halon
3	Central Hallway by Room 11	10# ABC
4	Central Control Room	Halon
5	Behind Central Control Room (door)	Halon
5A	Behind Central Control Room (backwall)	Halon
6	Women's Change Room	10# ABC
7	SWP Lobby by RPT Office	20# ABC
8	Men's Locker Room	10# ABC
9	West Switch Gear Room	Halon
10	Maintenance Lunch Room	Halon
11	Maintenance Shop Hallway	20# ABC
12	Maintenance Shop	5# ABC
13	Welding Crib	5# ABC
14	Tool Crib Room 100	20# ABC
15	Dock Gas Welding Cart	10# ABC
16	Electricians Maintenance Shop	10# ABC
17	Maintenance Building Upstairs	10# ABC
18	2714-A Building	10# ABC
19	Paint Shack	20# ABC
20	Service Blower Room	10# ABC
21	Power Control Process Blower Room	10# ABC
22	Power Control Room	Halon
22A	Process Blower Room Dock (BBQ)	5# ABC
23	Compressor Room Entry	10# ABC
23A	Compressor Room Door North	10# ABC
24	Compressor Portable (outside)	10# BC
25	Badgehouse Upper East Wall	Halon
25A	Badgehouse Upper AMS	10# ABC
25B	Badgehouse Lower AMS	10# ABC
26	AMU Basement	10# ABC
27	AMU 1ST Floor	10# ABC
28	AMU 2ND Floor	10# ABC
29	AMU 3RD Floor	10# ABC
30	AMU Penthouse	20# ABC
31	Upstairs Room 102B (hallway)	10# ABC
32	Upstairs Room 105 (hallway)	10# ABC
33	Computer Room 113	10# ABC
33A	Computer Room 113A	Halon
34	Lunch Room	10# ABC
35	P & O Gallery Rack 62	10# ABC
36	P & O Gallery Rack 50	20# ABC
37	P & O Gallery Rack 44	10# ABC
38	P & O Gallery Portable Welder	10# ABC
39	P & O Gallery Portable Gas Cart	10# ABC
40	Exit Compressor Room (Col 26)	10# ABC
41	P & O Gallery Rack 25	10# ABC
42	P & O Gallery Head End Door	10# ABC

FIRE EXTINGUISHERS

<u>Station Number</u>	<u>Location</u>	<u>Type</u>
43	P & O Gallery Drown Tank C-3A	10# ABC
44	Lab Dock	10# ABC
45	Lab Lunchroom Hallway	20# ABC
46	Lab Women's Locker Room	10# ABC
47	Lab Men's SWP Change Room	10# ABC
48	Lab Hallway Room 60	10# ABC
49	Lab Counting Room 55	Halon
50	Sample Receiving #2	10# ABC
51	Lab Hallway Room 53	10# ABC
52	Lab Hallway Room 51	10# ABC
53	Lab Supply Room	10# ABC
54	Lab Vent Room East Entrance	10# ABC
55	Lab Vent Room West Entrance	5# ABC
56	Head End Battery Room Entrance	10# ABC
57	Head End Control Room	Halon
58	Behind Head End Panel	10# ABC
59	East Switch Gear Room	Halon
60	East Change Room	10# ABC
61	East SWP Change Room	10# ABC
62	East End A-Equipment Room	10# DC
63	White Room	10# ABC
64	Canyon Lobby	Halon
65	Sample Gallery Col. 2	10# ABC
66	Sample Gallery Col. 9	10# ABC
67	Sample Gallery Col. 18	10# ABC
68	Sample Gallery Col. 24	10# ABC
69	Sample Gallery Col. 29	10# ABC
70	Sample Gallery Col. 34	10# ABC
71	U-Cell Entrance	10# ABC
72	Sample Gallery Col. 39	10# ABC
73	Sample Gallery Manipulator Shop	10# ABC
74	PIV Room East End	Halon
75	PIV Room West End	Halon
76	Storage Gallery by Elevator	20# ABC
77	Storage Gallery Col. 24	10# ABC
78	Storage Gallery Col. 28 Upper Level	10# ABC
79	Storage Gallery Col. 29	10# ABC
80	Storage Gallery Col. 33 Upper Level	10# ABC
81	Storage Gallery Col. 34	10# ABC
82	Storage Gallery Col. 36 Upper Level	10# ABC
83	Storage Gallery Col. 39	10# ABC
84	Storage Gallery East End	10# ABC
85	Q-Cell Exit to Stairs	10# ABC
86	Q-Cell Corridor Airlock	10# ABC
87	Q-Cell Hood Maintenance Room	10# ABC
88	Q-Cell AMU	10# ABC
89	Hot Shop Lobby	10# ABC
90	Hot Shop	10# ABC
90A	Hot Shop	20# A
90B	Hot Shop	20# BC

FIRE EXTINGUISHERS

<u>Station Number</u>	<u>Location</u>	<u>Type</u>
91	N-Cell Loadout Room	10# ABC
92	N-Cell Lower Glovebox Room	10# ABC
93	N-Cell Top of Stairs	Halon
94	Upper Control Room	Halon
95	Upper Glovebox Room	20# ABC
96	PR Corridor	10# ABC
97	N-Cell Lower Control Room	Halon
98	PR Room	10# ABC
99	L-11	10# ABC
100	Mezzanine Between L11 and L10	Halon
101	N-Cell PR Elevator Penthouse	10# ABC
102	R-Cell	10# ABC
102A	R-Cell	10# ABC
103	ECMP	10# ABC
104	East Crane Cab Foyer	10# ABC
104A	East Crane Cab	10# BC
105	East Crane On Top	15# BC
106	Slave Crane	10# ABC
106A	Slave Crane On Top	10# ABC
107	WCMP	10# ABC
108	West Crane Cab	10# ABC
108A	West Crane Cab Foyer	10# ABC
108B	West Crane Relay (Back Room)	10# BC
109	West Crane On Top Of Bridge	10# ABC
110	West Elevator Motor Room	10# ABC
111	211-A Dock 8	10# ABC
112	211-A East Wall	10# ABC
113	203-A Pump House	10# ABC
114	203-A Control Room	10# ABC
115	206-A Door #1	10# ABC
116	RR Cut Storage Shed	10# ABC
117	RR Cut Inside Tunnel Door	10# ABC
118	RR Cut Inside Car Puller Motor Room	10# ABC
119	MO-666	20# ABC
119A	MO-666	10# ABC
120	HO-64-15323 (S&PM Trailer)	10# ABC
120A	HO-64-15323 (S&PM Trailer)	10# ABC
121	MO-707 Inside (Maint. Engineering Tr)	10# ABC
121A	MO-707 Outside (Maint. Engineering Tr)	10# ABC
122	MO-023 Kitchen (Misc Trailer)	10# ABC
122A	MO-023 Northwest Door (Misc Trailer)	10# ABC
122B	MO-023 Southeast Door (Misc Trailer)	20# ABC
123	MO-035 (Material Control Trailer)	10# ABC
124	MO-409 Northeast (Lab Trailer)	10# ABC
124A	MO-409 Northwest (Lab Trailer)	10# ABC
125	2711-A	10# ABC
126	2712-A	10# ABC
127	213-A	10# BC
128	291-AD Outside	10# ABC
128A	291-AD Inside	10# ABC

FIRE EXTINGUISHERS

<u>Station Number</u>	<u>Location</u>	<u>Type</u>
129	212-A	20# BC
130	295-A ASD	10# ABC
131	294-A	10# BC
132	292-AB Bottle Rack At Stack Building	Halon
133	292-AB North Door Inside Stack Bldg.	10# ABC
133A	292-AB South Door Inside Stack Bldg.	Halon
134	293-A Airlock	10# ABC
135	293-A Upper Control Room	10# ABC
136	291-A Steam Turbine South Wall	10# BC
137	291-AE 4th Filter Bldg. Front Entry	10# ABC
137A	291-AE 4th Filter Building Back Exit	10# ABC
138	295-AB PDD	10# ABC
138A	295-AB PDD Change Shack	10# ABC
139	PR Dock	10# ABC
140	Emergency Generator Inside Fence	10# ABC
141	Emergency Generator Outside Fence	10# ABC
142	203-A Change Shack	10# ABC
143	206-A/RR Cut Change Shack	10# ABC
144	PUREX Backside Change Shack	10# ABC
145	RR/Cut Change Shack Outside Compound	10# ABC
146	MO-405 SE Door	10# ABC
147	MO-405 Kitchen	10# ABC
148	MO-405 NE Door	10# ABC
149	MO-405 NW Door	10# ABC
150	MO-405 SW Door	10# ABC
151	MO-405 Front Entry Airlock	10# ABC
152	MO-347 NE Door	10# ABC
153	MO-347 Kitchen	10# ABC
154	MO-347 NW Door	10# ABC
155	MO-355 NE Door	Halon
156	MO-355 Kitchen	10# ABC
157	MO-355 NW Door	10# ABC
158	Training Trailer	10# ABC
159	Training Trailer	10# ABC
160	MO-273 East Bay East Wall	10# ABC
161	MO-273 Front Door Entrance	10# ABC
162	MO-273 West Bay West Wall	10# ABC
163	MO-273 North Hallway	10# ABC
164	MO-273 Kitchen	10# ABC

FIRE HYDRANTS

Operations Inspection Frequency: Monthly

<u>Hydrant Number</u>	<u>Location</u>
1A	Across from 211-A (eastside)
2A	East of Lab Dock #7 and Lab Trailer
R3A	Southeast Corner Backside of PUREX by Door 275
4A	Eastend, Backside of PUREX
5A	Eastside of Building 213
--	Westside of Building 213
R6A	Westend, Backside of PUREX
7A	Westend Backside of PUREX, across from 2712-A
8A	Northwest end of MO-023, by steamline
R9A	Westend Frontside of PUREX, next to water storage tank
10A	Front of 202-A, next to PUREX Badgehouse walkway

FIRE DEPARTMENT CONNECTORS

Operations Inspection Frequency: Monthly

<u>Connector Number</u>	<u>Location</u>
1	FDC at Badgehouse
2	FDC Riser 3 south of PR Dock
3	FDC Riser 1 next to SWP Dock
4	FDC Foam System next to Door 75
5	FDC next to Door 83
6	FDC Laboratory Sprinkler System next to Door 174

SAFETY SHOWERS

Operations Inspection/Test Frequency: Monthly

<u>Station Number</u>	<u>Location</u>
1	AMU Basement (north)
2	AMU Basement (south)
3	AMU 1st Floor
4	AMU 2nd Floor
5	AMU 3rd Floor
6	AMU Dock (Bay B)
7	P&O Gallery Rack 62
8	P&O Gallery Rack 55
9	P&O Gallery Rack 48
10	P&O Gallery Rack 42
11	P&O Gallery Rack 35
12	P&O Gallery Rack 32
13	P&O Gallery Rack 26
14	P&O Gallery Rack 21
15	P&O Gallery Rack 15
16	P&O Gallery Rack 7
17	P&O Gallery Rack 3
18	Lab Hallway
19	Lab Hallway
20	Lab Supply Room
21	Lab Dock (outside door 102)
22	White Room Column 9
23	White Room Column 5
24	Sample Gallery Column 3
25	Sample Gallery Column 7
26	Sample Gallery Column 11
27	Sample Gallery Column 15
28	Sample Gallery Column 17
29	Sample Gallery Column 21
30	Sample Gallery Column 25
31	Sample Gallery Column 28
32	Sample Gallery Column 30
33	Sample Gallery Column 34
34	Sample Gallery Column 38
35	Sample Gallery Column 40
36	U-Cell
37	Q-Cell Hood Maintenance Room
38	Q-Cell AMU
39	Hot Shop
40	R-Cell
41	211-A Dock
42	211-A Sulfuric Tank
43	211-A Sulfuric Tank
44	211-A Dock 8
45	211-A Dock 8
46	211-A Dock 8
47	211-A Dock 8
48	211-A Tank 34 Neutralizer

SAFETY SHOWERS

<u>Station Number</u>	<u>Location</u>
49	211-A Tank 11
50	211-A Tank 12
51	211-A Tank 20
52	211-A Tank 21
53	211-A Tank 40
54	211-A Tank 41
55	211-A Tank 42
56	211-A Inside (northwest)
57	211-A Inside (southeast)
58	211-A Nitric Unload Station
59	215-A NAOH Station (truck pad area)
60	215-A NAOH Station (trench area)
61	203-A Outside East Wall
62	203-A Pump House
63	203-A Control Room
64	203-A Dock 10 (east)
65	203-A Dock 10 (west)
66	203-A by Tank P-4
67	206-A (inside Fractionator Bldg)
68	293-A Outside (west wall)
69	293-A Lower Control Room
70	293-AA (H2O2 Area)
71	New PDD (not in service yet)
72	295-AC CSL

EYE WASH STATIONS (PERMANENT)

Operations Inspection/Test Frequency: Monthly

<u>Station Number</u>	<u>Location</u>
1	AMU Basement (north)
2	AMU Basement (south)
3	AMU 1st Floor
4	AMU 2nd Floor
5	AMU 3rd Floor
6	AMU Dock (Bay B)
7	Lab Hallway
8	Lab Hallway
9	Lab Hallway
10	Lab Supply Room
11	Battery Charging and Storage Room
12	Sample Gallery Column 3
13	Sample Gallery Column 30
14	Q-Cell AMU
15	211-A Inside (southeast)
16	215-A NAOH Station (truck pad area)
17	215-A NAOH Station (trench area)
18	293-AA (H2O2 area)
19	New PDD (not in service yet)

EYE WASH STATIONS (PORTABLE-GREEN UNITS)

Operations Inspection Frequency: Monthly
Pipefitter PM (2A24026) Frequency - empty and refill: Bi-Annual (twice yearly)

<u>Station Number</u>	<u>Location</u>
1	Paint Shop
2	Lab Vent Room (southwest end)
3	PIV Room (cage)

EYE WASH STATIONS (PORTABLE-SILVER UNITS)

Operations Inspection Frequency: Weekly
Pipefitter PM (2A24025) Frequency - empty and refill: Monthly

<u>Station Number</u>	<u>Location</u>
1	Central Control Instrument Room
2	Head End Instrument Room
3	N-Cell
4	N-Cell
5	PR Room

SELF-CONTAINED BREATHING APPARATUS

Operations Bottle Pressure/Equipment Inspection Frequency: Weekly
Operations Functional Test/Equipment Inspection Frequency: Monthly

<u>Station Number</u>	<u>Location</u>
1	Main Hallway
2	Main Hallway
3	Main Hallway
4	Main Hallway
5	Main Hallway
6	Main Hallway
7	Main Hallway
8	Main Hallway
9	East Switchgear Room
10	East Switchgear Room
11	Lab Lunchroom Hallway
12	Lab Lunchroom Hallway
13	N-Cell Upstairs Hallway
14	N-Cell Upstairs Hallway

EVACUATION BUSES

Operations Start/Run Frequency: Weekly
Operations Functional Test/Equipment Inspection Frequency: Monthly
200E Garage Class B Inspections: Yearly

<u>Bus Number</u>	<u>Location</u>
HO-1B-01810	PUREX Front Parking Lot (west side of MO-273)
HO-1B-01817	PUREX Front Parking Lot (west side of MO-273)
HO-1B-01827	PUREX Front Parking Lot (west side of MO-273)

AMU/211-A SPILL CONTROL STATIONS

Operations Inspection Frequency (plant operating): Weekly
Operations Inspection Frequency (plant down): Monthly

<u>Station Location</u>	<u>Spill Control Station Contents</u>
AMU Basement	■ Tyvek Acid Suit
AMU 1st Floor	■ Acid Type Goggles
AMU 2nd Floor	■ Acid Type Gloves
AMU 3rd Floor	■ Hazorb Pads
211-A	■ Polyzorb Pads
	■ Disposable Bags

AMU/211-A SPILL CONTROL CENTERS

Operations Inspection Frequency (plant operating): Weekly
Operations Inspection Frequency (plant down): Monthly

<u>Station Location</u>	<u>Spill Control Station Contents</u>
AMU Basement	■ Acid Spill Kit
AMU 1st Floor	■ Caustic Spill Kit
AMU 2nd Floor	■ Solvent Spill Kit
AMU 3rd Floor	
211-A	

TEST EVACUATION/TAKE COVER SIRENS

Operations Test Frequency: Monthly

Type of Siren

Evacuation (steady)
Take Cover (wavering)

PAX CRASH ALARM

Operations Test Frequency: Weekly

Type of Alarm

Pax Crash Alarm (steady phone ring)

SELF-ILLUMINATED "EXIT" LIGHTS

Operations Inspection Frequency: Monthly

<u>Door Number</u>	<u>Location of Light</u>
16	Compressor Room Door to P&O Gallery - Column 26
19	P&O Gallery to Lab - Column 35
*167	Lab Mens SWP Room to Change Room
240	Lab Vent Room Eastend Door
238	Lab Vent Room Westend Door
27	Lab Vent Room from Crane Gallery
*166	Lab Corridor East Airlock
102	Lab Airlock Door to Dock 6
173	Lab Door to Dock 5 Eastside - Outside Door
174	Lab Storage Room to Dock 5 - Outside Door
*168	Lab Womens SWP to Change Room
125	Lab Airlock to Dock 7 - Outside Door
131	East Switchgear to Dock 7
20	East Switchgear to P&O Column 35
24	P&O Gallery to East Stairwell
B-115	Storage Gallery Eastend
*25	Mezzanine to East PRV
*271	East Change Room to South Stairs
263	SWP Lobby to ECMP Stairs
331	ECMP Door - Canyon Side
B-175	Bottom of ECMP Stairwell - Outside Door
B-4	Sample Gallery to SWP Lobby Stairwell Column 10
*B-5	Sample Gallery to AMU Airlock Column 18
B-8	Sample Gallery to Lab Stairs Column 31
*B-47	Sample Gallery to East Stairwell
B-49	Sample Gallery to West Stairwell
12	P&O Gallery Column 10
39	Maintenance Lunchroom Hallway
501	Westend Maintenance Shop - Outside Door
29	Tool Crib - Outside Door
505	271-AB East Entrance - Outside Door
525	271-AB Upstairs East Hallway Door - Outside Door
509	271-AB Upstairs North Door - Outside Door
43	West Switchgear Room Door - Outside Door
no #	Hallway to Door 44
44	SWP Lobby - Outside Door
*143	Supply Room Hallway Door
142	Womens SWP Room to Supply Room
no #	Womens Change Room East Wall
148	Main Lobby Door to Door B-60
207	2nd Floor by Conference Room - Outside Door
no #	2nd Floor Hall to Door B-207
69	AMU First Level - Outside Door
B-14	Basement AMU to Stairwell
B-113	Storage Gallery by Elevator
236	2nd Level AMU by Elevator
no #	3rd Level AMU by Stairs
14	P&O Gallery Column 19

SELF-ILLUMINATED "EXIT" LIGHTS

<u>Door Number</u>	<u>Location of Light</u>
15	P&O Gallery Column 22
75	Service Blower - Outside Door
76	PROCESS BLOWER WEST DOOR - Outside Door
83	PROCESS BLOWER EAST DOOR - Outside Door
84	COMPRESSOR ROOM OUTSIDE DOOR - Outside Door
B-49	Sample Gallery to West Stairwell
B-101	Hot Shop Lobby to West Stairwell
B-135	N-Cell Airlock--South Doors
*B-149	N-Cell Entrance--Inside
*B-146	N-Cell Entrance--Inside
*B-104	PR Corridor West Door
B-120	By West R-Cell Door West Wall
B-119	Eastside between N-Q-Cell Glovebox
B-138	N-Cell Lower Control Room
B-133	N-Cell Mezzanine
201	WCMP to West Stairwell
*161	Canyon Lobby Inside

LEGEND:

- *(xxx): door may not be numbered
- B-(xxx): door is below main floor level
- no #: no door # on door or floor plan

EMERGENCY ACID SUIT LOCKERS

Operations Seal Inspection Frequency: Monthly
Operations Replenish/Reseal Frequency: Quarterly

<u>Locker Location</u>	<u>Number of Lockers</u>
AMU Basement	1 emergency
AMU 1ST Floor	1 emergency
AMU 2ND Floor	2 emergency
AMU 3RD Floor	1 emergency
P&O - Column 24	2 emergency
P&O - Column 40	1 emergency
211-A	1 emergency
203-A	1 emergency
206-A	1 emergency
293-A	1 emergency
Q-Cell	1 emergency
Sample Gallery Column 4	1 emergency
Sample Gallery Column 15	1 emergency
Sample Gallery Column 33	1 emergency

Emergency Acid Suit Locker Contents:

- Complete Acid Suit with Hood
- Full Face Shield
- British Leggins/Rubber Boots
- Acid Type Goggles
- Acid Type Gauntlet Gloves

EMERGENCY CABINETS

Operations Inspection/Replenish Frequency: Quarterly

Cabinet Locations

1. Lab Trailer MO-409 (outside/southside)
2. 2714-A Chemical Warehouse (outside on dock)
3. Across from the PR Dock (by steamline)

Cabinet Contents

Quantity

Battery operated light	1 each
Cyalume lightsticks, white (2 yr shelf life)	1 package
Fire blanket in tote pack	1 each
Radiation rope	1 roll
Yellow rope	1 roll
Acid suit	2 each
Face shield	2 each
Goggles (acid type)	3 pair
Acid resistant rubber boots	2 pair
Acid resistant rubber gloves	2 pair
Leather gloves	4 pair
Hazorb spill control pillows	6 each
Polyzorb spill control pillows	6 each
Sorbent material (kitty litter)	1 gallon
Plastic disposable bags	1 bundle
PCB gloves	2 pair
Masking tape	1 roll
Green tape	1 roll
Retractable knives	2 each
Blank "Caution" sign	2 each
Blank "Danger" sign	2 each
Grease type pencil	1 each
First aid kit (mostly bandages/check seal)	1 each
List of phone numbers of persons to contact	1 list

Information List:

- A. Radiological Safety Kit has SWP and respirators located in MO-035.
- B. Bomb Search Kit has rope, tape, flashlights and copy of Emergency Plan, located in MO-035.
- C. Emergency SCBA's
 - Lab Hallway
 - East Switchgear Room
 - Main Lobby Area (mens change room hallway)
 - 211-A Building
 - 2711-A Building

BOMB SEARCH KIT

Administrative Inspection/Replenish Frequency: Quarterly

Kit Location

MO-035

Kit Contents

Quantity

Flashlights (with batteries)	6
Bump hats	6
Gloves	6 pairs
Maps	6 sets
Marking pens	6
Mirrors (and extension handles)	6
Crescent wrenches (for mirror adjustments)	2
Spools of string	6
Green tape	6 rolls
Masking tape	6 rolls

EMERGENCY LANTERNS

Covered on the following Electrical PM's:

2A22001 - Monthly
2A22058 Annual
2A22074 Annual

CORRESPONDENCE DISTRIBUTION COVERSHEET Page 1 of 2

Author J. R. Bellomy, 6-1745	Addressee CE Findley, EPA TL Nord, Ecology	Correspondence No. Incoming: 9101780 Ref #9152838
Subject: RESPONSE TO THE FEBRUARY 5, 1991, NOTICE OF DEFICIENCY FOR THE PUREX STORAGE TUNNELS DANGEROUS WASTE PERMIT APPLICATION (TSD: S-2-1)		

INTERNAL DISTRIBUTION

Approval	Date	Name	Location	w/att
		Correspondence Control	A3-01	
		<u>PUREX / UO3 Plant</u>		
		R. V. Bowersock	S6-19	
		K. A. Hadley	N1-35	
		D. G. Harlow	S6-17	
		G. J. LeBaron	S6-19	
		J. C. Midgett	S6-15	
		R. C. Roal	S6-08	
		M. L. Sullivan	S6-19	
		<u>ENVIRONMENTAL DIVISION</u>		
		J. R. Bellomy	H4-57	
		L. C. Brown	H4-51	
		C. J. Geier	H4-57	
		R. J. Landon	B2-19	
		R. E. Lerch (Assignee)	B2-35	
		S. M. Price	H4-57	
		F. A. Ruck III	H4-57	



CORRESPONDENCE DISTRIBUTION COVERSHEET Page 2 of 2

Author	Addressee	Correspondence No.
J. R. Bellomy, 1945	CE Findley, EPA TL Nord, Ecology	Incoming: 9101780
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INTERNAL DISTRIBUTION

Approval	Date	Name	Location	w/att
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SAFETY, QUALITY ASSURANCE,
AND SECURITY

J. R. Bell	R3-09
G. D. Carpenter	B2-16
D. G. Farwick	H4-16
D. E. Good	S0-97
J. W. Hagan	B3-55
P. A. Praetorius	S1-56

GENERAL COUNSEL

C. K. DiSibio	B3-03
B. D. Williamson	B3-15

CONTROLLER

E. P. Vodney	B3-50
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ENVIRONMENTAL AND WASTE MANAGEMENT PROGRAM
INTEGRATION

L. L. Powers	B2-35
J. L. Waite	B2-35

cc: R. J. Bliss (Level I)	B3-04
EDMC/AR	H4-22
JRB LB	H4-57
JCM LB	S6-15

Attachments same as letter #9152838



9112111000