TRI-PARTY AGREEMENT

Change Notice Number TPA-CN- 1108	TPA CHANGE NOTICE FORM	Date: 10/18/2021
Document Number, Title, and Revision: RPP-12711, Temporary Waste Transfer Line Management Program Plan, Revision 7D		Date Document Last Issued: 07/20/2021
Originator: Bryan Trimberger		Phone: 509-376-2674

Description of Change:

Revise Appendix D, Section C, 8th bullet on page D-3 to update the radiation value to be consistent with RPP-6711, Rev. 9, "Evaluation of Hose-in-Hose Transfer Line Service Life.

B.A. Harkins (**DOE**) and J.J. Lyon (**Lead Regulatory Agency**) agree that the proposed change

Modifies an approved work-plan/document and will be processed in accordance with the Tri-Party Agreement Action Plan, Section 9.0, *Documentation and Records*, and not Chapter 12.0, *Changes to the Agreement.*

Revise Appendix D, page D-3, to update the radiation value to be consistent with RPP-6711, Rev. 9.

Note: Include affected page number(s)

Justification and Impacts of Change:

Revise RPP-12711 to include the HIHTL service life changes that were incorporated into RPP-6711 Rev. 9.

See the attached redline changes for RPP-12711 Appendix D, page D-3.

Approvals:

Brian A. Harkins Digitally signed by Brian A. Harkins Date: 2021.10.28 15:52:33 -07'00' DOE Project Manager	Date	[X] Approved [ ] Disapproved
EPA Project Manager	Date	[ ] Approved [ ] Disapproved
Digitally signed by Lyon, Jeffery (ECY) Date: 2021.11.04 14:24:46 -07'00' Ecology Project Manager	Date	[X] Approved [ ] Disapproved

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- Learn from the manufacturer, ASTM International guidance, etc., what class of organic chemicals are of a concern.
- Possible additional operational constraints (e.g., flushing or chemical additions) may be required or used to extend the operational life of the HIHTL.
- Sodium hydroxide concentration less than or equal to 50 percent by weight.

- Radiation less than or equal to ~~100Kgray~~ 500Kgray = ~~1~~ 5 x 10^7 Rad.

    - Examples of potential controls:

        - Measurement of the transfer line in the field using a Geiger-Mueller and portable alpha meter and walking the line down, usually every 12 hrs during retrieval with a correction factor for the shielding.
        - Dosage calculations using surveillance data and the best-basis inventory. Surveillance data should be used to validate and support the calculations based on the best-basis inventory and limit the associated uncertainty.

D. A visual inspection of the HIHTL to be witnessed by the IQRPE or his representative for the full length of the HIHTL during transfer of an HIHTL (i.e., physical movement of the HIHTL from one location to another). If HIHTL is not being transferred, IQRPE or his representative to witness movement of any portions of the HIHTL moved.

Observations will focus on stresses, abnormalities, etc. of the secondary hose.

E. A leak test of the HIHTL connections in pits will be performed, which will be witnessed by the IQRPE or his representative. This leak test, in conjunction with the factory pressure tests performed prior to the HIHTL being placed in service, satisfies the **Tightness Testing** requirements specified in 40 CFR 265.192(d). HIHTL connections will not be broken to perform leak inspections of midpoints or at any point in the line that has not been disconnected since its last leak test was performed. If the leak test shows that any HIHTL is found to not be tight, all repair to remedy the leak in the system will be performed prior to the tank system being covered, enclosed, or placed in use.

F. A formal notification of the determination to extend the service life of an HIHTL will be submitted to the Washington State Department of Ecology. The package will include the evaluation, which considers each of the items A through E, reviewed and certified by an IQRPE. The scope of the IQRPE review will be consistent with and satisfy the requirements of 40 CFR 265.192.

G. The completed package to extend the service life of an HIHTL will be placed in the operating record.

H. References

Title 40 CFR 265.192, "Interim Status Standards for Owners and Operators of Hazardous Waste, and Disposal Facilities-Design and installation of new tank systems or components," *Code*