STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
Richland Field Office
3100 Port of Benton Blvd., Richland, WA 99354 • 509-372-7950

April 19, 2022 22-NWP-057

Paul A. Schroder, Acting Deputy Assistant Manager
Tank Farms Division
Office of River Protection
United States Department of Energy
PO Box 450, MSIN: H6-60
Richland, Washington 99352

Re: Need for Modification of the *Maintenance and Performance Monitoring Plan for the Interim Surface Barriers Program* (M&M Plan), RPP-RPT-61684, Revision 03

Dear Paul A. Schroder:

The Department of Ecology (Ecology) previously provided the United States Department of Energy (USDOE) with our comments on your proposed revision of the M&M Plan, which is a Tri-Party Agreement (TPA) Primary Document. In accordance with TPA Action Plan Section 9.2.1, we understand you are currently reviewing and responding to those comments and that you will provide an updated version of the document for our review and approval by July 1, 2022.

Following the submission of our comments, Ecology's compliance team conducted a regulatory review of the M&M Plan and identified a number of deficiencies that need to be addressed for purposes of compliance with Washington Administrative Code 173-303-320 (General Inspection).

As a result, Ecology has determined that further modification to the M&M Plan is necessary in accordance with TPA Action Plan 9.3.

Our comments detailing the need for additional modification are enclosed.

Because USDOE has not yet transmitted an updated version of the proposed revision of the M&M Plan for Ecology's review and approval in response to our previous comments, we propose that our agencies work together to maximize regulatory efficiencies and minimize duplication of work by incorporating the enclosed comments into your ongoing review rather than addressing this set of comments through a separate process. We understand you may need an extension of time in order to accommodate this and we are happy to work with you to identify a reasonable deadline.

If you have any questions or concerns, please contact me at jeff.lyon@ecy.wa.gov or (509) 539-1996, or Maria Skorska, Closure Engineer, at maria.skorska@ecy.wa.gov or (509) 380-3085.

Sincerely,

Digitally signed by Lyon, Jeffery (ECY)
Date: 2022.04.19 16:19:02 -07'00'

Jeffery J. Lyon
Tank Systems Operation and Closure Project Manager
Nuclear Waste Program

ms/aa
Enclosure

cc electronic w/enc:
David Einan, EPA
Ricky Bang, USDOE
Jon Perry, HMIS
Marcel Bergeron, WRPS
Mason Murphy, CTUIR
Jack Bell, NPT
Alyssa, Wanapum
Laurene Contreras, YN
ERWM Staff, YN
Steve Wiegman, HAB
David Reeploeg, Hanford Communities
Max Woods, ODOE
Kathy Conaway, Ecology
Jay Decker, Ecology
Jeff Lyon, Ecology
Jared Mathey, Ecology
Nina Menard, Ecology
John Price, Ecology
Kyle Rucker, Ecology
Maria Skorska, Ecology
Environmental Portal
Hanford Administrative Record
Hanford Facility Operating Record
HAB Correspondence Control
HMIS Correspondence Control
USDOE Correspondence Control
WRPS Correspondence Control

Review Comment Record	Washington State Department of Ecology Nuclear Waste Program	Date: 4/19/2022 Page 1 of 4

Document Title(s)/Number(s): Comments Detailing Additional Modification on *Maintenance and Performance Monitoring Plan for the Interim Surface Barriers*, RPP-PLAN-61684, Revision 03

Document Manager	Telephone Number	Project Manager	Telephone Number	Facility Site ID	Cleanup Site ID
		Jeff Lyon	(509) 539-1996		

Item No.	Pg. # Sec. # Para./Sent.	Comment or Question	Modification Needed	Basis/Justification	Permittee Response	Ecology Response	Open/Close	Reviewer Initials
1.	Section 3.1 4th paragraph.	The following underlined was deleted from the Rev. 2 of the this document. Performance monitoring instruments in T Tank Farm collect data to determine if the soil under the interim surface barrier is drying out. These instruments are grouped into four nests (TA, TB, TC, TD). Each nest includes a neutron probe access tube, a capacitance probe with five sensors, and four heat dissipation units (HDU). The TA nest is located outside the barrier footprint and serves as a control. The TB nest is located on the barrier edge, and nests TC and TD are located completely inside the barrier footprint. These three instrument sites monitor soil moisture content under the barrier footprint. Nests TA and TB were installed in late fiscal year (FY) 2006 and monitoring was initiated in September 2006. Nests TC and TD were installed in FY 2007 and monitoring was initiated in May 2008. Figure 2 shows the nest site locations at T Farm. The above deleted details need to be maintained in the document. If WRPS removed this equipment, they need to notify Ecology that the monitoring equipment has been removed.	Please revert this paragraph back to the RPP-RPT-61684, Rev. 2 language.	Deleting details of the performance monitoring devices removes clarity in the report and needs to be added back.				
2.	Sections 3.2.1, 4.1.1, 5.1.1, 6.1.1, 7.1.2 Visual Inspections	Inspections of the interim barriers, need to comply with WAC 173-303-320(2)(d) and (3). Since this document is a primary document, it needs to be clear about the requirements for inspections of the interim barriers.	Add the following language in underline to the referenced sections. 3.2.1 Visual inspections will be conducted quarterly in accordance with WAC 173-303-320(2)(d) and (3). 4.1.1 Visual inspections will be conducted quarterly in accordance with WAC 173-303-320(2)(d) and (3) and are a requirement listed in PMID-BAS-4241, Maintenance Program System Analysis and Technical Basis. 5.1.1 Visual inspections will be conducted quarterly in accordance with WAC 173-303-320(2)(d) and (3) and are, a requirement listed in PMID-BAS-4241.	Documentation of inspections and responses to inspections of the barriers need to meet regulatory requirements for operating and structural equipment that help prevent, detect, or respond to hazards to the public health or the environment. Since these Tanks have known releases to the environment, these barriers fit into this category. Additionally, with the current language in this document, not including the references to the regulatory requirements, implies they are not required to be followed under the TPA Primary Document.				

			6.1.1 TX Tank Farm interim surface barrier and evapotranspiration basin designs have been completed. Current construction activities on TX Farm Basin are underway. Upon completion of construction activities for the basin and barrier, visual inspection requirements will be similar to those listed in PMID-BAS-4241 for T, TY, and SX Farms and will be conducted in accordance with WAC 173-303-320(2)(d) and (3) 7.1.1 U Tank Farm interim surface barrier and evapotranspiration basin designs are underway. Once construction activities complete for the basin and barrier, visual inspection requirements will be similar to those listed in PMID-BAS-4241 for T, TY, and SX Farms and will be conducted in accordance with WAC 173-303-320(2)(d) and (3).					
3.	Sections 3.2.2, 4.1.2, 5.1.2, 6.1.2, 7.1.2 Interim Measures Inspections and Maintenance – After bullets	When inspections occur of the interim barriers, they need to comply in accordance with WAC 173-303-320(2)(d) and (3). Since this document is a primary document, it needs to be clear about the requirements for inspections of the interim barriers.	Add the following language in underline to the following sentences: Issues noted during surveillance will be addressed in accordance with WAC 173-303-320(2)(d) and (3) and as follows:	Documentation of inspections and responses to inspections of the barriers need to meet regulatory requirements for operating and structural equipment that help prevent, detect, or respond to hazards to the public health or the environment. Since these Tanks have known releases to the environment, these barriers fit into this category. Additionally, with the current language in this document, not including the references to the regulatory requirements, implies they are not required to be followed under the TPA Primary Document.				
4.	Sections 3.2.2, 4.1.2, 5.1.2, 6.1.2, 7.1.2 Interim Measures Inspections and Maintenance – After bullets	The reference to a Problem Evaluation Request (PER), needs to be updated in the following language. The PER system is no longer used and needs to be changed throughout this document where referenced. Minor items (e.g., removal of sand from a culvert) will be addressed by processing a work request and will be assigned resources based on the priority of the repair. Note that environmental related work activities are considered of the highest priority for the TOC. For more significant items a PER will be prepared and submitted, a request for an engineering evaluation of the situation will be requested and a work request will be generated based on the outcome of the engineering evaluation. (TFC-PLN-14)	The reference to a Problem Evaluation Request (PER), needs to be updated in the following language. The PER system is no longer used and needs to be changed throughout this document where referenced. The current corrective action system is the Condition Reporting and Resolution System (CRRS).	References to outdated corrective action systems needs to be updated.				

5.	Section 4.1.2, 5.1.2, Barrier Performance Monitoring.	Tables 3 and 5. Data Collection Methods and Approximate Frequency Under Normal Working Conditions was removed from the RPP-RPT-61684 in between Rev. 2 and Rev. 3 changes. These tables provided the requirements for monitoring soil water content, soil water pressure, soil temperature, air temperature, and precipitation. Removing these tables removes some of the inspections of the TY Farm Interim Barrier that are pertinent to monitoring the effectiveness of the interim barrier over the TY Farm.	Add Tables 3 and 5. Data Collection Methods and Approximate Frequency Under Normal Working Conditions from the RPP-RPT-61684 Rev. 2 back to Rev. 3 and update the table number in the report accordingly.	Deletion of inspection requirements of the Interim Barriers.				