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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

1315 W. 4th Avenue • Kennewick, Washington 99336-6018 • (509) 735-7581

May 15, 1996

Mr. Jon Peschong, Deputy Director
Waste Storage Division
U.S. Department of Energy
P.O. Box 550
Richland, WA 99352



Dear Mr. Peschong:

Re: Single Shell Tank 241-A-101 Ventilation

The Washington State Department of Ecology (Ecology) has received and is currently reviewing the U.S. Department of Energy's (USDOE) document entitled "A Safety Assessment For Salt Well Jet Pumping Operations In Tank 241-A-101: Hanford Site, Richland, Washington" (document number WHC-SD-WM-SAD-034, Rev. 0, dated April 15, 1996). Although Ecology's review is not complete, it has been noted the Safety Assessment (SA) was prepared on the basis that A-101 is not to be actively ventilated (either continuously or intermittently).

During a tank headspace homogeneity presentation made to Defense Nuclear Safety Board staff on February 20-21, 1996, it was explained that several tests were on-going to validate current modeling assumptions. Specifically, quarterly vapor and gas measurements of four tanks and passive ventilation rates measurements were planned. It does not appear the results of these tests have been incorporated into the above referenced SA. In addition, it does not appear any such tests were planned for A-101. Ecology concurs with the need to validate the modeling assumptions being utilized to understand the headspace flow rates associated with passively ventilated tanks.

During the last three months, Ecology representatives have been stauted on the proposed submittal of a Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement or TPA) change request affecting the interim stabilization program. Considering Milestone M-41-10 specifically and in relation to the SA for tank A-101, Ecology requests the following information prior to USDOE's submittal of a change request package incorporating interim stabilization of A-101:

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- 1) A-101 riser inspection documentation which confirms non-blockage (i.e., confirmation of ventilation) of the riser(s) utilized for passive ventilation of the tank. Such inspection results should be recent and/or have occurred after the last intrusive activity involving each respective riser.
- 2) Written procedures to be followed prior to interim stabilization activities which confirm tank breathing rates which are assumed in the SA.
- 3) Written procedures which will be followed during interim stabilization activities (i.e., all intrusive activities related to interim stabilization) to confirm the tank is breathing and ventilation is adequate for the proposed activities.

Please submit the requested information prior to submittal of the referenced TPA change request package. If the information is not available prior to the submittal of the TPA change request package, a schedule which identifies when the information will be obtained is requested. If you or your staff have any questions regarding this topic, please call me at (509) 736-3018.

Sincerely,



Dr. Alex Stone, Safety Project Manager
Nuclear Waste Program

AS:mf

cc: James McClusky, USDOE
Craig Groendyke, USDOE
Mary Jarvis, USDOE
John Clark, USDOE
Carolyn Haas, USDOE
Doug Sherwood, EPA
Roger Bacon, WHC
Administrative Record, M-41