



2007I-080

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

3100 Port of Benton Blvd • Richland, WA 99352 • (509) 372-7950

December 6, 2006

Mr. Todd Martin, Chair
Hanford Advisory Board
713 Jadwin Avenue, Suite 4
Richland, WA 99352

Re: Hanford Advisory Board (HAB) Consensus Advice #193 – Double Shell Tank
Integrity Assessment

Dear Mr. Martin:

Thank you for the HAB's advice on the Double-Shell Tank Integrity Assessment Report. Of the eight bulleted items, Ecology agrees with the first seven. We expressed similar concerns in our comments to the U.S. Department of Energy – Office of River Protection (USDOE-ORP) on the Integrity Assessment (IA). These are discussed below.

For bullet eight, we plan to continue our permitting efforts for the Double-Shell Tank (DST) System. Alternatives to permitting have been discussed. However, Ecology still believes that a permit will provide more opportunity for oversight, control, and operational flexibility than alternate enforcement actions. Also, the permitting process allows for greater public participation, and we believe a more suitable permit can be developed through that process.

Ecology reviewed the IA and sent our comments to USDOE-ORP on December 4, 2006. The document review process, as agreed to in the Tri-Party Agreement, provides for resolution of the concerns expressed in our comments. After comment resolution, Ecology will develop the specific DST System permit conditions necessary to continue storage of waste in the DSTs.

We will consider each tank, pipeline, and specific part of the ancillary equipment as items that can be removed from service, should conditions warrant. This option will be available throughout the IA review process and will be part of our considerations when developing the DST System permit conditions. Ecology will develop a permit that includes the complete DST system. However, where there are unique considerations or concerns, the permit will identify them and provide appropriate conditions as necessary.

USDOE-ORP does regular inspections and has plans to continue to inspect new places within the individual tanks. Ecology will review the current USDOE-ORP assessment plan to assure that inspections are included. From this review, Ecology will ensure that a regular and appropriate program is maintained by specifying conditions in the DST System permit.



Mr. Todd Martin
December 6, 2006
Page 2

Ecology agrees that there should be an effort to inspect more of the tank surface area and that this should be based on a recommended code. We provided a comment requesting further discussion of this. Following resolution of our comment, a schedule for ongoing integrity assessment will be required, including reporting the results to Ecology. An integrity assessment schedule is required by the Washington Administrative Code (WAC) as part of the permitting process.

Ecology agrees that corrosion assessments of the transfer piping are necessary. The Independent Qualified Registered Professional Engineer recommended assessments in the IA. We provided a comment on this issue as well. Following our comment resolution with USDOE-ORP, we will develop permit conditions to ensure necessary assessments are initiated and continued.

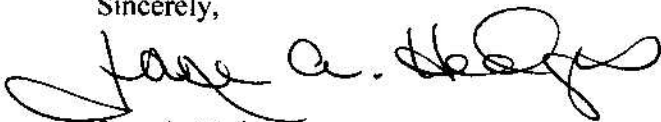
Ecology does not believe that this IA should be a "living document." We do believe that ongoing integrity assessments are essential and are more appropriately managed in the permitting process. We agree that any IA report should define the current condition of the DST System, reflect the uncertainty about the life expectancy, and identify both past and future expected conditions. A number of our comments address concerns related to this part of the HAB Consensus Advice. Following resolution of the comments, we will better understand the need and specific requirements for ongoing inspections.

The HAB advice includes a statement regarding "assessing if and when new tanks may need to be constructed." Ecology agrees that the information specified would be necessary to provide for safe storage of waste over the life of the tank. The WAC requires that the assessment consider the design standards to which the system was constructed and that the tank system be acceptable for storing waste. After comment resolution, Ecology anticipates that permit conditions will assure necessary actions can be implemented to meet these requirements and avert any threat to human health and the environment.

Finally, Ecology agrees that we should require USDOE-ORP to maintain an integrity assessment plan that includes annual inspections, tests, trending, and repairs. USDOE-ORP currently has plans in place that are intended to meet these requirements. Through the IA Review process, Ecology will review these plans to ensure that sufficient information is provided to meet the intent of WAC requirements.

Ecology appreciates the HAB's review of the IA and the resulting advice. We look forward to your review of the DST System Draft Permit to assure that conditions meet your expectations.

Sincerely,



Jane A. Hedges
Program Manager
Nuclear Waste Program

jjl/lkd

cc: Nick Ceto, EPA
Roy Schepens, USDOE