From:

Conaway, Kathy (ECY) [KCON461@ecy.wa.gov]

Sent:

Monday, May 16, 2011 9:44 AM

To:

Williams, Joel F Jr

Subject:

RE: Occurrence Report Question

OK Thanks.

From: Williams, Joel F Jr [mailto: Joel F Jr Williams@RL.gov]

Sent: Monday, May 16, 2011 9:34 AM

To: Conaway, Kathy (ECY)

Cc: Clark, Cliff E.; Collins, Michael S; Mortensen, A S (Stuart); Tuott, Lee C; Miskho, Anthony G; Flyckt, Don L; Aljure,

Gustavo A

Subject: RE: Occurrence Report Question

Kathy

I picked up your message with your request for information on the occurrence report today (refer to email below). I was gone on inspection all day Thursday (May 12, 2011) and after reviewing this request the information, a response will be prepared for submittal back to you.

if you have any questions, please call me on 376-4782 or (b)(6)

Thanks for your time and patience.

Joel F. Williams Jr.
CHPRC Regulatory Inspection Lead
Environmental Protection
CH2M Hill PRC

From: Conaway, Kathy (ECY) [mailto:KCON461@ecv.wa.gov]

Sent: Thursday, May 12, 2011 12:02 PM

To: Williams, Joel F Jr

Cc: Biebesheimer, Joanette (ECY)
Subject: Occurrence Report Question

On #3 of the report: Significance Category: 2. What does "2" mean? How is "2" defined? Who was the Building

Emergency Director (BED) for this WRAP event?

Tri-Party Agreement Section (TPA) Nuclear Waste Program (NWP) Compliance Specialist

Washington Department of Ecology

Phone: (509) 372-7890 Email: <u>kcon461@ecv.wa.gov</u>

FAX: (509) 372-7971

From:

Conaway, Kathy (ECY) [KCON461@ecy.wa.gov]

Sent:

Monday, May 16, 2011 3:16 PM

To:

Williams, Joel F Jr

Subject:

RE: REQUEST TO REVIEW VERBAL QUESTIONS ON MAY 12, 2011

HI Joel. You can delete #6 on notifications. There are permit requirements and the HEMP for notifications. Instead #6 can be this question: What was the waste in the drum that leaked? How is the information request pkg coming?

From: Williams, Joel F Jr [mailto:Joel F Jr Williams@RL.gov]

Sent: Monday, May 16, 2011 2:31 PM

To: Conaway, Kathy (ECY)

Cc: Clark, Cliff E.; Collins, Michael S; Cawrse, Alian E; Dixon, Brian J; Engelmann, Richard H; Miskho, Anthony G;

Mortensen, A S (Stuart); Flyckt, Don L; Aliure, Gustavo A

Subject: REQUEST TO REVIEW VERBAL QUESTIONS ON MAY 12, 2011

Importance: High

Kathy

On May 12, 2011 you met with CHPRC (Al Cawrse) to discuss inspection issues. During the discussions, you asked that CHPRC respond to six (6) verbal questions about Ecology issues with the WRAP container leak that happened in the 2404WB building. DOE requested that I type the verbal questions and send the questions to you for review. In this way the written version of your verbal question is correctly interpreted so that CHPRC can provide you the correct response to your question.

The following the verbal questions:

- 1. Who was the BED?
- 2. What determination was made regarding the event?
- 3. What classification was assigned?
- 4. Who was the chemical hazards assessor?
- 5. Who was the facility staging area manager?
- 6. How do we determine notifications?

Please review the above questions and provide any comments or changes that you need and forward back to me and I will get the questions to the proper personnel for response.

If you have any questions, please call me on 376-4782 or (b)(6)

Thanks for your time and patience.

From:

Conaway, Kathy (ECY) [KCON461@ecy.wa.gov]

Sent:

Wednesday, May 18, 2011 6:28 PM

To:

Williams, Joel F Jr Singleton, Deborah

Cc: Subject:

RE: SCHEDULING WRAP MEETING FOR MAY 20, 2011 (FRIDAY)

I apologize. Yes, I was in a conference room without my cell phone. Deborah and I will be driving to WRAP Friday morning. Want to leave our office by 8:30. I want to talk with the WRAP Nuclear Chemical Operator that reported the drum leak. The building emergency director for WRAP, respective site contractor single point- of- contact, personnel responding to the spill, facility manager, WRAP NDA staff that signed off on the NDA application (paperwork has initials "JMH 04/12/11" on the WRAP Data Management System pkg for container 00662288). Helpful to have copies of the documents you provided on the CD and DOE/RL-94-02 Hanford Emergency Management Plan, building emergency plan and the recovery plan. Where is the document pkg for Container HEDL-63 that was shipped from 218-4C, Trench 4 in June 2006? Is it only the AK pkg HNF-30810 for RLM325D? I want the whole file on the drums: HEDL-63, 062288 and its daughter containers and finally the new drum that now contains 062288 drum. This is a start.

From: Williams, Joel F Jr [mailto:Joel F Jr Williams@RL.gov]

Sent: Wednesday, May 18, 2011 4:49 PM

To: Conaway, Kathy (ECY)

Cc: Clark, Cliff E.; Mckarns, Tony C.; Collins, Michael S; Weil, Stephen; Mortensen, A S (Stuart); Tuott, Lee C

Subject: SCHEDULING WRAP MEETING FOR MAY 20, 2011 (FRIDAY)

Kathy

Left you a phone message about scheduling a meeting with DOE and WRAP Facility personnel for May 20, 2011 (Friday) at WRAP.

Could you please send me an email letting me know what personnel you will like at this meeting from WRAP that you have identified for interviewing on the WRAP 2404-WB Building leaking container.

If you have any questions, please call me on 376-4782 or (b)(6)

Thanks for your time and patience.

From:

Williams, Joel F Jr

Sent: To: Monday, May 16, 2011 9:34 AM

70.

Conaway, Kathleen (ECY)

Cc:

Clark, Cliff E.; Collins, Michael S; Mortensen, A S (Stuart); Tuott, Lee C; Miskho, Anthony G;

Flyckt, Don L; Aljure, Gustavo A

Subject:

RE: Occurrence Report Question

Kathy

I picked up your message with your request for information on the occurrence report today (refer to email below). I was gone on inspection all day Thursday (May 12, 2011) and after reviewing this request the information, a response will be prepared for submittal back to you.

If you have any questions, please call me on 376-4782 or (b)(6)

Thanks for your time and patience.

Joel F. Williams Jr.
CHPRC Regulatory Inspection Lead
Environmental Protection
CH2M Hill PRC

From: Conaway, Kathy (ECY) [mailto:KCON461@ecy.wa.gov]

Sent: Thursday, May 12, 2011 12:02 PM

To: Williams, Joel F Jr

Cc: Biebesheimer, Joanette (ECY)
Subject: Occurrence Report Question

On # 3 of the report: Significance Category: 2. What does "2" mean? How is "2" defined? Who was the Building

Emergency Director (BED) for this WRAP event?

Tri-Party Agreement Section (TPA) Nuclear Waste Program (NWP) Compliance Specialist

Washington Department of Ecology

Phone: (509) 372-7890 Email: <u>kcon461@ecv.wa.gov</u>

FAX: (509) 372-7971

From: Sent: To: Ce: Subject:	Williams, Joel F Jr [joel_f_ir_williams@rl.gov] Monday, May 16, 2011 2:31 PM Conaway, Kathleen (ECY) Clark, Cliff E.; Collins, Michael S; Cawrse, Allan E; Dixon, Brian J; Engelma Miskho, Anthony G; Mortensen, A S (Stuart); Flyckt, Don L; Aljure, Gustavo REQUEST TO REVIEW VERBAL QUESTIONS ON MAY 12, 2011	nn, Richard H; A	
importance:	High		
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If you have any questions, ple	ase call me on 376-4782 or (b)(6)		
Thanks for your time and patience.			
Joel F. Williams Jr. CHPRC Regulatory Inspection Environmental Protection CH2M Hill PRC	n Lead	x *	

From:

Williams, Joel F Jr [joel_f_ir_williams@rl.gov]

Sent:

Wednesday, May 18, 2011 4:49 PM

To:

Conaway, Kathleen (ECY)

Cc:

Clark, Cliff E.; Mckarns, Tony C.; Collins, Michael S; Weil, Stephen; Mortensen, A S (Stuart);

Tuott, Lee C

Subject:

SCHEDULING WRAP MEETING FOR MAY 20, 2011 (FRIDAY)

Kathy

lieft you a phone message about scheduling a meeting with DOE and WRAP Facility personnel for May 20, 2011 (Friday) at WRAP.

Could you please send me an email letting me know what personnel you will like at this meeting from WRAP that you have identified for interviewing on the WRAP 2404-WB Building leaking container.

If you have any questions, please call me on 376-4782 or (b)(6)

Thanks for your time and patience.

From: Williams, Joel F Jr [joel_f_ir_williams@rl.gov] Sent:

Wednesday, May 18, 2011 5:22 PM

To: Singleton, Deborah

Clark, Cliff E.; Collins, Michael S; Mckams, Tony C.; Well, Stephen; Mortensen, A S (Stuart) Co:

FW: SCHEDULING WRAP MEETING FOR MAY 20, 2011 (FRIDAY) Subject:

Importance: High

Deborah

Below is an email message I sent to Kathy Conaway today requesting that an email be sent to me on who she would like to have at this WRAP meeting that maybe happening on May 20, 2011.

I am sending you this email as well because in an email from John Price today, he indicated that you will be accompanying her at this meeting and to put you on emails to Ms. Conaway.

If you have any questions or comments, please call me on 376-4782 or (b)(6)

Thanks for your time and patience.

Joel F. Williams Jr. CHPRC Regulatory Inspection Lead **Environmental Protection** CH2M HIII PRC

From: Williams, Joel F Jr

Sent: Wednesday, May 18, 2011 4:49 PM

To: Conaway, Kathleen (ECY)

Cc: Clark, Cliff E.; Mckarns, Tony C.; Collins, Michael S; Well, Stephen; Mortensen, A S (Stuart); Tuott, Lee C

Subject: SCHEDULING WRAP MEETING FOR MAY 20, 2011 (FRIDAY)

Kathy

Heft you a phone message about scheduling a meeting with DOE and WRAP Facility personnel for May 20, 2011 (Friday) at WRAP.

Could you please send me an email letting me know what personnel you will like at this meeting from WRAP that you have identified for interviewing on the WRAP 2404-WB Building leaking container.

If you have any questions, please call me on 376-4782 or (b)(6)

Thanks for your time and patience.

From: Sent:

Williams, Joel F Jr [oel_f_ir_williams@rl.gov]

To:

Tuesday, May 24, 2011 10:35 AM Conaway, Kathleen (ECY)

Cc:

Mckams, Tony C.; Mccarthy, Edward T; Collins, Michael S; Clark, Cliff E.; Weil, Stephen;

Miskho, Anthony G; Flyckt, Don L; Mortensen, A S (Stuart); Tuott, Lee C; Ramirez, Amanda J;

Triner, Glen C; Swan, Rhonda J (Roni); Seaver, Jennie R; Aljure, Gustavo A

Subject:

RE: Request to Talk with Waste Services

Kathy

Received your email and I will try to arrange the meeting this week with the individual you requested. I will contact you as soon as I can and let you know the day and time for the meeting.

If you have any questions, please call me on 376-4782 and (b)(6)

Thanks for your time and patience.

Joel F. Williams Jr. CHPRC Regulatory Inspection Lead **Environmental Protection** CH2M HILL PRC

From: Conaway, Kathy (ECY) [mailto:KCON461@ecy.wa.gov]

Sent: Tuesday, May 24, 2011 10:15 AM To: Williams, Joel F Jr; Mckarns, Tony C.

Cc: Mccarthy, Edward T

Subject: Request to Talk with Waste Services

HI Guys. I have time today, Weds, and Thursday to talk with Waste Services on questions surrounding the WRAP drum leak. I would like to do it at Ecology. The only conflict would be Wednesday from 2PM to 3PM and Thursday from 2PM to 3:30PM. All other times open. These questions will focus on waste designation, compatibility concerns and characterization.

Tri-Party Agreement Section (TPA) Nuclear Waste Program (NWP) Compliance Specialist Washington Department of Ecology

Phone: (509) 372-7890 Email: kcon461@ecv.wa.gov

FAX: (509) 372-7971

From:

Williams, Joel F Jr

Sent:

Wednesday, May 25, 2011 10:26 AM

To:

Conaway, Kathleen (ECY)

Cc:

Clark, Cliff E.; Weil, Stephen; Collins, Michael S; Mckarns, Tony C.; Tuott, Lee C; Mortensen,

A S (Stuart); Dixon, Brian J; Cawrse, Alian E; Engelmann, Richard H; Aljure, Gustavo A;

Seaver, Jennie R; Mccarthy, Edward T; Sutton, Leslie N

Subject:

RESPONSE TO ECOLOGY QUESTIONS ON SIGNIFICANT CATEGORY 2

importance:

High

Kathy

On May 12, 2011 email you had three (3) questions that you would like responded to based on the Occurrence Report EM-RL-CHPRC-WRAP-2011-0002, dated April 26, 2011. The following are the responses to the questions:

1. Question:

Significance Category 2, What does the "2" mean?

Response:

The Department of Energy (DOE-HQ) occurrence reporting system was established to ensure timely collection, reporting, analysis, and dissemination of information on environment, safety, and health issues as required by law or regulations or as needed to ensure that the DOE-HQ and National Nuclear Security Administration are kept fully informed on a timely basis about events that could adversely affect the health and safety of the public or the workers, the environment, the intended purpose of DOE facilities, or the credibility of the Department. The Occurrence Reporting and Processing System (ORPS) reports are prepared to meet DOE internal needs. They are not intended to be used for external regulatory reporting purposes. In the ORPS system "Significant Category 2" indicates an incident (in this case a small leak in drum in storage) resulted in a moderate impact to facility operations. The impact to WRAP operations was caused by the radiologic constituents in the leakage which resulted in a potential exposure of workers to the radioactive materials. Because of that potential for exposure, operations in the 2404-WB building were temporarily suspended until a recovery plan could be developed and executed.

2. Question:

How is "2" defined?

Response:

The response to Question 1 states and defines the use "Significant Category 2"

3. Question:

Who was the Building Emergency Director (BED) for this

WRAP event?

WRAP

Response:

The BED that was on duty the day of the leaking container name is (b)(6)

Duty Operations Supervisor.

If you have any questions, please call me on 376-4782 or (b)(6)

Thanks for your time and patience.

From:

Williams, Joel F Jr fjoel_f_ir_williams@rl.gov]

Sent:

Wednesday, June 08, 2011 4:46 PM

To:

Conaway, Kathleen (ECY)

Cc:

Clark, Cliff E.; Collins, Michael S; Weil, Stephen; Mckarns, Tony C.; Mccarthy, Edward T; Mortensen, A S (Stuart); Tuott, Lee C; Triner, Glen C; Ramirez, Amanda J; Dixon, Brian J; Engelmann, Richard H; Cawrse, Allan E; Blackford, Leonard T (TY); Miskho, Anthony G;

Flyckt, Don L; Seaver, Jennie R

Subject:

DOE/CHPRC RESPONSE TO ECOLOGY ON CONTAINER LEAK AT 2404-WB DATED MAY

26, 2011

Importance:

High

Kathy

The following are responses that have been prepared by DOE/CHPRC to the five (5) questions that you had sent per your email to me dated May 26, 2011:

1. Will there be sampling and analysis of the WRAP drum material that leaked onto the floor and/or drum contents?

Response: There will be analysis of the waste. The plan is to provide real time radiograph (RTR) analysis of the overpacked drums and further analyze the drum contents by placing the waste in a glovebox for repackaging. Although not completed yet, a waste treatment plan will be developed for the drum contents that will include pH testing. If neutralization is needed, upon completion of the neutralization activity, pH testing will be performed to verify successful completion of that activity. Depending on the final disposal location and the facility's revised repack procedures, additional sampling and analysis may be performed if required to ensure compliance with the facility's and disposal and regulatory requirements. Waste generated through the cleanup activities will be assessed for storage and disposal.

2. When will that (sampling) occur?

Response: Sampling is not planned but analysis will occur as described in response to Question 1 above as part of the glovebox analysis and drumming of cleanup materials. If sampling is performed, WRAP will inform Ecology of the activity.

3. What was done with the clean-up materials used in the drum spill?

Response: The clean-up materials generated to date that are contaminated with dangerous wastes include leaking drum 0062288 overpacked into drum 0059303; and contaminated pallets that have been wrapped with plastic sheeting. Drum 0059303 has been labeled as a dangerous waste and is on a spill pallet. Due to the large size of the wrapped contaminated pallets, a large box is being acquired to transport these wastes to an off-site TSD for size reduction. This will enable this waste to be containerized and assayed to determine whether it is a mixed-TRU waste or mixed LLW. Until the box arrives, the wrapped pallets are managed as a dangerous waste and stored in 2404-WB on a pallet.

4. Was it (clean-up materials) put in a drum and assigned an ID#?

Response: Each waste drum has a Package Identification Number (PIN) barcode identification and will be tracked both in the WRAP Data Management System (DMS) and in the Hanford Solid Waste Information Tracking System (SWITS). As of 5/31/11, the recovery activities have generated eight 55-gallon drums of step-off pad waste consisting of paper, plastic, cloth, respirator mask filter cartridges, rubber and other materials used to decontaminate the building. This material has not been designated as a dangerous waste since it has not contacted the leaked material. As the recovery activities proceed, the spilled material will be recovered and placed in

containers in a manner that is compatible with the wastes. Containers with the leaked material or anything that has contacted the leaked material will be managed as a mixed (dangerous and radioactive) waste with applicable waste codes assigned.

5. What is the rad (radioactive) reading now in 2404 WB?

Response: The question regarding the radioactive readings in 2404-WB is outside the scope of the dangerous waste regulations. However, as a matter of comity the following information is provided:

On 5/31/11:

-80% of the building has been confirmed free of contamination.

~20% of the building is posted a Contamination Area and contains about a dozen spots of low level contamination (<10,000 dpm/100 cm² alpha).

No airborne radioactivity has been detected.

High levels of contamination are covered (baking soda, soil cement & tarp) and not currently exposed.

If you have any questions, please call me on 376-4782 or (b)(6)

Thank you for your time and patience.

From: Sent:

Conaway, Kathy (ECY) [KCON461@ECY.WA.GOV]

To:

Wednesday, May 04, 2011 3:44 PM

Singleton, Deborah

Cc:

Biebesheimer, Joanette (ECY); Collins, Michael S

Subject:

RE: Occurrence Report

Deborah, no impact to WIPP shipments because the drum was not shipped. 2404 WB is a DW storage unit with secondary containment so there is (was) secondary containment. Normally on a drum leak like this discovered during inspection, etc, one would use an absorbent pad however, this had rad and beryllium so could not use that method.

From: Singleton, Deborah (ECY)

Sent: Wednesday, May 04, 2011 3:02 PM

To: Conaway, Kathy (ECY) Subject: FW: Occurrence Report

FYI

From: Collins, Michael [mailto:Michael.Collins@rl.doe.gov]

Sent: Wednesday, May 04, 2011 2:55 PM

To: Singleton, Deborah (ECY) Subject: RE: Occurrence Report

Hi Deborah - I'll try to get a hold of you tomorrow with more details. In the meantime a letter to Ecology has been drafted explaining why an inspection was missed and why more might be missed.

I don't think this will affect our ability to meet the certification and shipment milestones.

We probably need to talk about secondary containment in regards to this waste stream. The x-ray of the parent drum showed no liquids. The waste, absorbent material that was determined to be acidic and damp after it was opened in the WRAP glove, was neutralized and extra absorbent material added before placed in the daughter drums.

Mike C.

From: Singleton, Deborah (ECY) [mailto:dsin461@ECY.WA.GOV]

Sent: Wednesday, May 04, 2011 10:04 AM

To: Collins, Michael

Subject: Occurrence Report

Thanks Mike for the info.

Since this was a waste stream destined for WIPP, will this incident impact the certification project?

This incident reinforces the need for secondary containment.

Deborah Singleton Waste Management Project Manager WA State Department of Ecology Nuclear Waste Program 509 372-7923 (w)

(b)(6)

(c)

From:

Williams, Joel F Jr

Sent:

Wednesday, May 25, 2011, 1:34 PM

To:

Singleton, Deborah

Cc:

Clark, Cliff E.; Weil, Stephen; Collins, Michael S; Mckarns, Tony C.; Tuott, Lee C; Mortensen,

A S (Stuart); Dixon, Brian J; Cawrse, Allan E; Engelmann, Richard H; Aljure, Gustavo A;

Seaver, Jennie R; Mccarthy, Edward T; Sutton, Leslie N

Subject:

FW: RESPONSE TO ECOLOGY VERBEL QUESTIONS ON WRAP LEAKING CONTAINER

ON MAY 12, 2011

Importance:

High

Deborah

I apologize (again) I neglected to put you on the distribution for DOE/CHPRC responses to Ecology (Kathy Conaway) below.

If you have any questions, please call me on 376-4782 of (b)(6)

Thanks for your time and patience.

Joel F. Williams Jr. CHPRC Regulatory Inspection Lead **Environmental Protection** CH2M Hill PRC

From: Williams, Joel F Jr

Sent: Wednesday, May 25, 2011 10:26 AM

To: Conaway, Kathleen (ECY)

Cc: Clark, Cliff E.; Weil, Stephen; Collins, Michael S; Mckarns, Tony C.; Tuott, Lee C; Mortensen, A S (Stuart); Dixon, Brian J; Cawrse, Allan E; Engelmann, Richard H; Aljure, Gustavo A; Seaver, Jennie R; Mccarthy, Edward T; Ullman, Jonathan D; Carter, Cathie A; Sutton, Leslie N

Subject: RESPONSE TO ECOLOGY VERBEL QUESTIONS ON WRAP LEAKING CONTAINER ON MAY 12, 2011

Importance: High

Kathy

On May 12, 2011, you had a meeting with CHPRC (Al Cawrse) you had asked six (6) questions pertaining to the WRAP leaking container event on April 26, 2011. On May 16, 2011 I sent you an email to confirm the verbal questions that you had asked of Mr. Cawrse on May 12, 2011. You responded back stating the questions were correct but you had deleted question # 6 and added two (2) more questions.

The following are the responses to the verbal and written questions:

1. Questions:

Who is the BED?

Response:

(b)(6)

was the declared BED for the "as found" contamination response in 2404-WB.

Question:

What determination was made regarding the event?

Response:

Initial event response determination has been captured in CHPRC Critique/Investigation Report EM-RL-CHPRC-WRAP-2011-0002. This critique will be provided to you as part of the package of documents Ecology requested during the May 20, 2011 meeting with

DOE/CHPRC at WRAP and will be submitted to you by May 26, 2011.

3. Question:

What classification was assigned?

Response:

The event was determined not to have met any of the WRAP Emergency Action Level (EAL) criteria in DOE-0223RLEP 1.0-App 1-2.L. Recognizing and Classifying Event Emergencies. The BED contacted the Occurrence Notification Center (ONC) within the specified time limits to confirm the event did not meet Abnormal Event criteria as well under PRC-PRO-EM-060, Reporting Occurrences and Processing Operations Information. The event was later determined to have met the criteria for occurrence reporting under

Group-6 Contamination/Radiation Control, Subgroup -B Spread of Radiation

Contamination which is a Significant Category 2 (SC-2) occurrence.

4. Question:

Who was the chemical hazards assessor?

Response:

The Industrial Hygienist responding to the "as found" contamination was (b)(6)(b)(6)

Ouestion:

Who was the facility staging area manager?

Response:

A Staging Area Manager was not assigned since there was no facility evacuation or facility take cover determined to be required.

What was the waste in the drum that leaked?

Response:

6. Question:

The waste was a mixed waste with an alpha emitting radioisotope. The waste was associated with processes in the 325 Building described in the AK package. Initial check of the material that had leaked using pH paper indicated that the liquid that leaked from the drum was acidic with a pH of < 2.

7. Question:

How is request package coming?

Response:

The requested information package that you requested on May 3, 2011 is the same information package of documents Ecology requested during the May 20, 2011 meeting with DOE/CHPRC at WRAP. All the requested information will be submitted to Ecology by May 26, 2011.

If you have any questions, please call me on 376-4782 or $(b)(\overline{6})$

Thank you for your time and patience.

From:

Williams, Joel F Jr

Sent:

Wednesday, May 25, 2011 1:32 PM

To:

Singleton, Deborah

Ca:

Clark, Cliff E.; Weil, Stephen; Collins, Michael S; Mckarns, Tony C.; Tuott, Lee C; Mortensen,

A S (Stuart); Dixon, Brian J; Cawrse, Allan E; Engelmann, Richard H; Aliure, Gustavo A:

Seaver, Jennie R; Mccarthy, Edward T; Sutton, Leslie N

Subject:

FW: RESPONSE TO ECOLOGY QUESTIONS ON SIGNIFICANT CATEGORY 2

Importance:

High

Deborah

I apologize I neglected to put you on the distribution for DOE/CHPRC responses to Ecology (Kathy Conaway) below.

If you have any questions, please call me on 376-4782 or (b)(6)

Thanks for your time and patience.

Joel F. Williams Jr.
CHPRC Regulatory Inspection Lead
Environmental Protection
CH2M Hill PRC

From: Williams, Joel F Jr

Sent: Wednesday, May 25, 2011 10:26 AM

To: Conaway, Kathleen (ECY)

Cc: Clark, Cliff E.; Well, Stephen; Collins, Michael S; Mckarns, Tony C.; Tuott, Lee C; Mortensen, A S (Stuart); Dixon, Brian J; Cawrse, Allan E; Engelmann, Richard H; Aljure, Gustavo A; Seaver, Jennie R; Mccarthy, Edward T; Sutton, Leslie

N

Subject: RESPONSE TO ECOLOGY QUESTIONS ON SIGNIFICANT CATEGORY 2

Importance: High

Kathy

On May 12, 2011 email you had three (3) questions that you would like responded to based on the Occurrence Report EM-RL-CHPRC-WRAP-2011-0002, dated April 26, 2011. The following are the responses to the questions:

1. Question:

Significance Category 2, What does the "2" mean?

Response:

The Department of Energy (DOE-HQ) occurrence reporting system was established to ensure timely collection, reporting, analysis, and dissemination of information on environment, safety, and health issues as required by law or regulations or as needed to ensure that the DOE-HQ and National Nuclear Security Administration are kept fully informed on a timely basis about events that could adversely affect the health and safety of the public or the workers, the environment, the intended purpose of DOE facilities, or the credibility of the Department. The Occurrence Reporting and Processing System (ORPS) reports are prepared to meet DOE internal needs. They are not intended to be used for external regulatory reporting purposes. In the ORPS system "Significant Category 2" indicates an incident (in this case a small leak in drum in storage) resulted in a moderate impact to facility operations. The impact to WRAP operations was caused by the radiologic

constituents in the leakage which resulted in a potential exposure of workers to the radioactive materials. Because of that potential for exposure, operations in the 2404-WB building were temporarily suspended until a recovery plan could be developed and executed.

2. Question:

How is "2" defined?

Response:

The response to Question 1 states and defines the use "Significant Category 2"

3. Question:

Who was the Building Emergency Director (BED) for this

WRAP event?

WRAP

Response:

The BED that was on duty the day of the leaking container name is (b)(6)

Duty Operations Supervisor.

If you have any questions, please call me on 376-4782 or (b)(6)

Thanks for your time and patience.

From:

Williams, Joel F Jr

Sent:

Wednesday, May 25, 2011 10:26 AM

To:

Conaway, Kathleen (ECY)

Co:

Clark, Cliff E.; Weil, Stephen; Collins, Michael S; Mckarns, Tony C.; Tuott, Lee C; Mortensen, A S (Stuart); Dixon, Brian J; Cawrse, Allan E; Engelmann, Richard H; Aljure, Gustavo A; Seaver, Jennie R; Mccarthy, Edward T; Uliman, Jonathan D; Carter, Cathie A; Sutton, Leslie

N

Subject:

RESPONSE TO ECOLOGY VERBEL QUESTIONS ON WRAP LEAKING CONTAINER ON

MAY 12, 2011

importance:

High

Kathy

On May 12, 2011, you had a meeting with CHPRC (Al Cawrse) you had asked six (6) questions pertaining to the WRAP leaking container event on April 26, 2011. On May 16, 2011 I sent you an email to confirm the verbal questions that you had asked of Mr. Cawrse on May 12, 2011. You responded back staring the questions were correct but you had deleted question # 6 and added two (2) more questions.

The following are the responses to the verbal and written questions:

1. Questions:

Who is the BED?

Response:

(b)(6)

was the declared BED for the "as found" contamination response in 2404-WB.

2. Question:

What determination was made regarding the event?

Response:

Initial event response determination has been captured in CHPRC Critique/Investigation Report EM-RL-CHPRC-WRAP-2011-0002. This critique will be provided to you as part of the package of documents Ecology requested during the May 20, 2011 meeting with

DOE/CHPRC at WRAP and will be submitted to you by May 26, 2011.

3. Question:

What classification was assigned?

Response:

The event was determined not to have met any of the WRAP Emergency Action Level (EAL) criteria in DOE-0223RLEP 1.0-App 1-2.L, Recognizing and Classifying Event Emergencies. The BED contacted the Occurrence Notification Center (ONC) within the specified time limits to confirm the event did not meet Abnormal Event criteria as well under PRC-PRO-EM-060, Reporting Occurrences and Processing Operations Information. The event was later determined to have met the criteria for occurrence reporting under

Group-6 Contamination/Radiation Control, Subgroup -B Spread of Radiation

Contamination which is a Significant Category 2 (SC-2) occurrence.

4. Question:

Who was the chemical hazards assessor?

Response:

The Industrial Hygienist responding to the "as found" contamination was (b)(6)

(b)(6)

5. Question:

Who was the facility staging area manager?

Response:

A Staging Area Manager was not assigned since there was no facility evacuation or facility

take cover determined to be required.

6. Question:

What was the waste in the drum that leaked?

Response:

The waste was a mixed waste with an alpha emitting radioisotope. The waste was associated with processes in the 325 Building described in the AK package. Initial check of the material that had leaked using pH paper indicated that the liquid that leaked from the drum was acidic with a pH of < 2.

7. Question:

How is request package coming?

Response:

The requested information package that you requested on May 3, 2011 is the same information package of documents Ecology requested during the May 20, 2011 meeting with DOE/CHPRC at WRAP. All the requested information will be submitted to Ecology by May 26, 2011.

If you have any questions, please call me on 376-4782 or (b)(6)

Thank you for your time and patience.

Sent; To: Subject:	Wednesday, May 25, 2011 12:01 PM Williams, Joel F Jr RE: RESPONSE TO ECOLOGY QUESTIONS ON SIGNIFICANT CATEGORY 2
Thanks Joel for bot	n info emails.
Sent: Wednesday, To: Conaway, Kath Co: Clark, Cliff E.; V Brian J; Cawrse, All	el F Jr [mailto:Joel F Jr Williams@RL.gov] May 25, 2011 10:26 AM y (ECY) Vell, Stephen; Collins, Michael S; Mckarns, Tony C.; Tuott, Lee C; Mortensen, A S (Stuart); Dixon, an E; Engelmann, Richard H; Aljure, Gustavo A; Seaver, Jennie R; Mccarthy, Edward T; Sutton, Lesl
1%	E TO ECOLOGY QUESTIONS ON SIGNIFICANT CATEGORY 2
Kathy	
On May 12, 2011 ems CHPRC-WRAP-2011	nil you had three (3) questions that you would like responded to based on the Occurrence Report EM-RL-0002, dated April 26, 2011. The following are the responses to the questions:
I. Question;	Significance Category 2, What does the "2" mean?
about events that compurpose of DOE facing reports are prepared purposes. In the OR resulted in a moderationstituents in the le	mation of information on environment, safety, and health issues as required by law or regulations or as a temporarily the DOE-HQ and National Nuclear Security Administration are kept fully informed on a timely basis all adversely affect the health and safety of the public or the workers, the environment, the intended lities, or the credibility of the Department. The Occurrence Reporting and Processing System (ORPS) to meet DOE internal needs. They are not intended to be used for external regulatory reporting PS system "Significant Category 2" indicates an incident (in this case a small leak in drum in storage) te impact to facility operations. The impact to WRAP operations was caused by the radiologic akage which resulted in a potential exposure of workers to the radioactive materials. Because of that e, operations in the 2404-WB building were temporarily suspended until a recovery plan could be ted.
2. Question:	How is "2" defined?
The response to Question	on 1 states and defines the use "Significant Category 2"
3. Question:	Who was the Building Emergency Director (BED) for this WRAP event?
The BED that was on d	aty the day of the leaking container name is $(b)(6)$ WRAP Duty Operations Supervisor.
s, please call me on 376-	
patience.	<u> </u>

From:

Conaway, Kathy (ECY) [KCON461@ecy.wa.gov]

Sent:

Wednesday, May 25, 2011 1:35 PM

To:

Williams, Joel F Jr

Cc:

Clark, Cliff E.; Weil, Stephen; Collins, Michael S; Mckarns, Tony C.; Tuott, Lee C; Mortensen, A S (Stuart); Dixon, Brian J; Cawrse, Allan E; Engelmann, Richard H; Aljure, Gustavo A; Seaver, Jennie R; Mccarthy, Edward T; Biebesheimer, Joanette (ECY); Ullman, Jonathan D;

Carter, Cathie A; Sutton, Leslie N; Conaway, Kathleen (ECY)

Subject:

RE: RESPONSE TO ECOLOGY VERBEL QUESTIONS ON WRAP LEAKING CONTAINER

ON MAY 12, 2011

What seems to be missing here is any evaluation under the Hanford RCRA Permit, dangerous waste portion. Even if there is a disconnect or lack of integration between the permit and USDOE site requirements, it does not seem (to Ecology) that that should provide any basis for lack of compliance with permit requirements.

From: Williams, Joel F Jr [mailto:Joel F Jr Williams@RL.gov]

Sent: Wednesday, May 25, 2011 10:26 AM

To: Conaway, Kathy (ECY)

Cc: Clark, Cliff E.; Weil, Stephen; Collins, Michael S; Mckarns, Tony C.; Tuott, Lee C; Mortensen, A S (Stuart); Dixon, Brian J; Cawrse, Alian E; Engelmann, Richard H; Aljure, Gustavo A; Seaver, Jennie R; Mccarthy, Edward T; Ullman, Jonathan D; Caster, Cathie A; Sitton, Locale N

Jonathan D; Carter, Cathie A; Sutton, Leslie N

Subject: RESPONSE TO ECOLOGY VERBEL QUESTIONS ON WRAP LEAKING CONTAINER ON MAY 12, 2011

Importance: High

Kathy

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(b)(6)

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What determination was made regarding the event?

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3. Question: What classification was assigned?

The event was determined not to have met any of the WRAP Emergency Action Level (EAL) criteria in DOE-0223RLEP 1.0-App 1-2.L, Recognizing and Classifying Event Emergencies. The BED contacted the Occurrence Notification Center (ONC) within the specified time limits to confirm the event did not meet Abnormal Event criteria as well under PRC-PRO-EM-060, Reporting Occurrences and Processing Operations Information. The event was later determined to have met the criteria for occurrence reporting under Group-6 Contamination/Radiation Control, Subgroup -B Spread of Radiation Contamination which is a Significant Category 2 (SC-2) occurrence.

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ispection Lead