

## **Department of Energy**

Richland Operations Office P.O. Box 550 Richland, Washington 99352

CERTIFIED MAIL

August 23, 2011

Ms. Lidice O'Brien Heart of America Northwest 1314 NE 56<sup>th</sup> Street Suite 100 Seattle, Washington 98105

Dear Ms. O'Brien:

FREEDOM OF INFORMATION ACT REQUEST (FOI 2011-01376)

Your Freedom of Information Act (FOIA) request dated June 21, 2011, was received in this office on June 27, 2011. In that letter you requested the following records:

- 1. "Drums and/or containers of waste that leaked, spilled, released, or contaminated workers at the Waste Repackaging and Processing facility (WRAP) since January 1, 2011, including, but not limited to, any "occurrence reports", laboratory or other tests to identify the contents of waste released or leaked, doses received or exposures to contaminants or hazardous substances."
- 2. "Notification of releases, leaks, spills or contamination to the Washington State Department of Ecology, U.S. Environmental Protection Agency, Coast Guard or any other regulator;"
- 3. "Any correspondence (including, but not limited to, letter(s), emails, phone call or meeting notes) to and/or from the Washington State Department of Ecology (Ecology) and/or Environmental Protection Agency (EPA) that report on building, unit or facility inspection(s) conducted pursuant to federal and state hazardous waste laws (RCRA and HWMA) for all buildings, units, storage areas where these wastes were at the time of the leak, spill, release and areas where they were previously stored."
- 4. "Identifying where, length of time, and how the waste was stored prior to storage or processing at the WRAP facility, including any inspection reports and occurrence reports for the area, building or unit where the waste was stored."
- 5. "All documents and records relating to a formal designation under Federal and State Hazardous Laws of wastes in the drums (or similar containers) that leaked, spilled or released."
- 6. "All occurrence reports, analysis of causes, and plans for response pertaining to the leak(s), spills or releases of waste at the WRAP facility; and, at the facility(ies) or buildings where the wastes were stored prior to being moved to WRAP."

- 7. "Permit conditions in effect for managing drums and containers of waste, for analyzing wastes, and for responding to leaks for the facility(ies) where the leak(s) occurred, and the facility(ies) where the waste was held prior to WRAP or such other facility or building(s) where releases, spills or leaks occurred. Please include all correspondence between USDOE and/or USDOE's contractors with the Washington Department Of Ecology and/or US EPA regarding compliance with permit conditions or drafting or new conditions based on inspections prompted by, or analyses of the causes of recent leaks, spills, releases."
- 8."All correspondence between the U.S. Department of Energy (USDOE), Ecology, EPA, and/or any of their contractors or agents, that concern to the storage of the waste by WRAP and or the facility(s) that stored the waste prior to WRAP, compliance with container management requirements under any permit or federal or state hazardous waste laws."
- 9. "All correspondence between USDOE, Ecology, and EPA, and or any of their contractors or agents concerning the leak(s), spills, releases or contamination incidents which occurred at the WRAP facility since January 1, 2011."
- 10. "Identifying the quantities and types of wastes stored and awaiting treatment or disposal at the Central Waste Complex (including identification-of any non-solid or liquid wastes), schedules for removal for treatment, and conditions or compliance schedules for meeting requirements of federal and state hazardous waste laws which limit the time period for storing wastes without treatment. This includes, but is not limited to, identification of the quantities of wastes stored in each building, area or unit; length of time stored; designations of wastes stored; permit or other conditions governing management of the wastes to ensure incompatible wastes are not stored; and, provisions for secondary containment."

This is an interim response and the following documents are enclosed to item 1 of your request:

- -CHPRC Radiological Control Lapel Sample Analysis Record(s), dated May 4, 2011 through July 7, 2011, (see Attachment I).
- CHPRC Radiological Control Air Sample Analysis Record(s), dated June 9 and 21, 2011, (see Attachment II).
- Radiological Control Grab Air Analysis Record(s), dated May 4, 2011 through June 27, 2011, (see Attachment III).
- CHPRC Radiological Survey Report Log Report (from 5/1/2011 to 6/30/2011 for WP Facility) WP-1101182 through WP-1101824, identifying survey number, date, and location and description of work, (see Attachment IV).

-CHPRC Radiological Survey Report(s), WP-1101182 through WP-1101824 (refer to CHPRC Radiological Survey Report Log Report), (see Attachment V).

Documents responsive to both items 2 and 3 are enclosed as Attachment VI.

The following documents have been deemed responsive to item 5 of your request and are enclosed as Attachment VII:

- -Series of e-mails, subject "HEDL drum requiring updates."
- Records Transmittal Sheet- Project- TRU Waste Certification Program. Document Number CCP-AK-RL-003. Central Characterization Project Acceptable Knowledge Summary Report for Hanford Site 325 Radiochemistry Building Transuranic Debris, dated 01/31/2006.
- -Memo from Melvin E. Lakes (CHPRC) to Cynthia Girres, Subject: 325 Facility Debris Waste Stream Designation, dated 04/27/2004.
- -Waste Designation Worksheet for Designation #325 TRU DEBRIS, dated 09/07/2004.
- -Waste Designation Worksheet for Designation #325 TRU DEBRIS, dated 09/07/2004. .
- -Container Data base for U381 TRU Retrieval Project, dated 03/30/2006.
- HNF-30810, Rev. 0. Acceptable Knowledge Document for 325 Building Radiochemistry Laboratory Mixed Debris Waste Stream, RLM 325D. Dated 11/13/2006.
- HNF-30810, Rev.1. Acceptable Knowledge Document for 325 Building Radiochemistry Laboratory Mixed Debris Waste Stream, RLM 325D. Dated 07/16/2007.
- Document Number CCP-AK-RL102. Central Characterization Project Acceptable Knowledge Summary Report for Hanford Site 325 Radiochemistry Building Transuranic Debris. Waste Stream RLM325D.001, Rev. 1. Dated 01/19/2011.
- -Solid Waste Information and Tracking System Container Listing Report for Package ID 0059303, dated 07/07/2011.
- -Solid Waste Information and Tracking System Container Listing Report for Package ID 0062288, dated 07/07/2011.

Enclosed is a copy of a document entitled "Safety Alert – Leaking Drums" dated June 30, 2011, responsive to item 8 of your request, see Attachment VIII.

The following documents have been deemed responsive to item 9, see Attachment IX:

-Illustration - Drum Relationship to HEDL-63.

-Timeline and Management of Waste Drum HEDL-63 from Generation to Repackaging (DRUM 0062288) 5/20/2011.

The documents below labeled "Reference" are identified in the above "Timeline and Management of Waste Drum HEDL-63."

<u>Reference 1</u>: CCP-AK-RL-003 Central Characterization Project Acceptable Knowledge Summary Report for Hanford Site Radiochemistry Building Transuranic Debris, Revision 0, dated November 26, 2003.

<u>Reference 2</u>: Don't Say It --- Write It!, Melvin Lakes to Cynthia Girres, "325 Facility Debris Waste Stream Designation," dated July 27, 2004.

<u>Reference 3a</u>: Part 1 - Waste Designation Worksheet for Designation # 325 TRU Debris, dated 9/7/2004.

<u>Reference 3b</u>: Part 2 - Waste Designation Worksheet for Designation # 325 TRU Debris, dated 9/7/2004.

Reference 4: Addendums (following documents)

Updating Overpack Container Checklist for 0031161 HEDL-63, dated 4/18/2006...

Addendum - SW-100-096 (TRU) Overpack Containers Attachment 1 – Overpack Data Sheet, dated 3/28/2006.

Addendum - Addendum to TSD Record Package ID: HEDL-63, dated 2/28/2005.

"Reference Materials" – Non-Combustible Solid Waste Burial Record W.H.-774A, HEDL-63, dated 5-17-1979 and Nuclear Material Transaction Report 00160711705, dated 5/17/1978.

<u>Reference 5</u> – The following are the Addendum and TRU Retrieval Checklist:

Addendum FY06RET124 Acceptable Knowledge for Container # 00311161, dated 10/19/2006.

TRU Retrieval Acceptance Checklist, Revision 1 with supporting documents, dated 5/30/2006.

<u>Reference 6</u> – HNF -30810, Acceptable Knowledge Document for the 325 Building Radiochemistry Laboratory Mixed Debris Waste Stream RLM325D, Revision 0, dated November 13, 2006.

Reference 7 – HNF -30810, Acceptable Knowledge Document for the 325 Building Radiochemistry Laboratory Mixed Debris Waste Stream RLM325D, Revision 1, dated July 16, 2007.

Reference 8a – Radiography Data Sheet, WRP1-OP-0908 Rev. J-1, Container 0031161, dated 9/3/2008.

<u>Reference 8b</u> – Real Time Radiography (X-Ray) of Container Number 0031161, dated 9/3/2008.

<u>Reference 8c</u> – Real Time Radiography (X-Ray) of Container Number 0031161 (rotated), dated 9/3/2008.

Reference 9 – TRUEDMT Database Image for Container # 0031161.

<u>Reference 10</u> – U381 TRU Retrieval Project Package # 0031161 – Designation Information Database Image, dated, 11/13/2008.

<u>Reference 11a</u> – Addendum Request Form Addendum to TSD Record – Updating SWITS to Indicate Appropriate Information for 3337, 85 Gallon Overpack, dated 12/15/2008.

<u>Reference 11b</u> – Assay record for Container # 0031161.

Reference 12 – Addendum Request Form Addendum to TSD Record – TRUM Drums Assayed and Quick Scanned at WRAP, Container # 0031161, with attached Solid Waste Information and Tracking System (SWITS) Container Listing Report Data update, dated 2/19/2009.

Reference 13 – TRU Information Bulletin, TRU-IB-10-010, 325 Radiochemistry Building Comprehensive Homogenous Solids Waste Stream S3000 RLM325, Revision 0, Change 0, dated May 7, 2010.

Reference 14 – SWITS Container Listing Report Data for Container # 0062288, dated 05/19/2011.

<u>Reference 15</u> - SWITS Container Listing Report Data for Container # 0061308, dated 05/19/2011.

<u>Reference 16</u> – Electronic Mail Norman P. Willis to Lee Tuott, Subject, FW: Leaking Drum Repack Instructions, dated May 19, 2011.

Reference 17a - WRAP-RP-03, CHPRC WRAP Facility Recovery Plan, Decontaminate Waste Drum(s) in 2404WB & Overpack, Revision 0, dated 5/1/2011.

Reference 17b - WRAP-RP-03, CHPRC WRAP Facility Recovery Plan, Decontaminate Waste Drum(s) in 2404WB & Overpack, Revision 3, dated 5/5/2011.

<u>Reference 18</u> - SWITS Discrepant Container Management Program (DCMP) Package Identification Number (PIN) History for Package ID: 0062288, dated 05/05/2011.

Reference 19 - SWITS DCMP PIN History for Package ID(s): 0062289, dated 05/10/2011, PIN 0081216, dated 05/12/2011, and PIN 0061308, dated 5/12/2011.

Reference 20 – Electronic Mail Lana Strickling to Markus H. McGrath and Paul J. Crowley, Subject: HEDL Drums Requiring Updates, dated May 16, 2011.

Reference 21 - SWITS DCMP PIN History for Package ID(s): 0062288, dated 04/26/2011.

A document entitled, "Building Emergency Plan for WRAP" Document No. HNF-IP-0263-WRAP is also responsive to this item of your request. A copy of the document was provided to you by this office on August 17, 2011, in response to item 6 of your request.

The CHPRC Critique/Investigation Report Form, Title: Contamination on Drum, Pallet, and Floor in 2404WB dated April 26, 2011, is also responsive to this item of your request. A copy of this document was previously provided to you on August 18, 2011, in response to items 1 and 8 of your request. In addition, the CRPRC Critique Personal Statement Forms dated March 26, 2011, were also provided to you on that date. Those documents are responsive to items 1, 8 and 9 or your request.

The following document provides the information requested for the Central Waste Complex and is responsive to item 7 and 10 of your request:

• Containers in Storage at Central Waste Complex (CWC), see Attachment X.

Also responsive to items 7 and 10 is the link that provides the information that includes "schedules for removal for treatment, and conditions or compliance schedules for removal for treatment, and conditions or compliance schedules for meeting requirements of federal and state hazardous waste laws which limited the time period for storing wastes without treatment," see http://www.hanford.gov/?page=82

Enclosed is a copy of the Hanford Facility Resource Conversation and Recovery Act Permit, Dangerous Waste Portion, see Attachment XI. This document is responsive to items 7 and 10 of your request.

We continue to search for documents responsive to your request and will notify you when our search and review is complete.

If you have any questions regarding your request, please contact me at our address above or on (509) 376-6288.

Sincerely,

Dorothy Riehle

Freedom of Information Act Officer

Office of Communications

and External Affairs

Attachments

OCE:DCR