

AIR 13-512  
NOC 879

STATE OF WASHINGTON  
DEPARTMENT OF HEALTH  
OFFICE OF RADIATION PROTECTION  
309 Bradley Blvd., Suite 201 • Richland, Washington 99352  
TDD Relay Service: 1-800-833-6388

MAY  
March 21, 2013

**CERTIFIED MAIL**

7008 1300 0001 5989 9673

Mr. Kevin W. Smith, Manager  
United States Department of Energy  
Office of River Protection  
P.O. Box 450, MSIN: H6-60  
Richland, Washington 99352

Dear Mr. Smith:

Pursuant to Chapter 246-247 of the Washington Administrative Code (WAC), your revised application will be approved according to the enclosed License for:

**Removal and Disposal of the Obsolete 242A Evaporator Building K-1 Exhauster  
(Replaces NOC 864) (NOC 879; EU 486)**

The Washington State Department of Health (DOH) considers the conditions, controls, monitoring requirements, and limitations of the License integral to approval of your application.

This approval shall take effect, and a final approval letter issued, twenty-eight (28) days after you receive it unless you apply for an adjudicative proceeding, as described below.

If you accept the conditions and limitations of this approval and do not wish to apply for an adjudicative proceeding, but wish to proceed under this approval before the 28 days have elapsed, please notify us in writing and the DOH will issue the final approval letter. Your notice should be mailed or faxed to:

DOH – Office of Radiation Protection  
Radioactive Air Emissions Section  
309 Bradley Blvd., Suite 201  
Richland, Washington 99352  
FAX: (509) 946-0876

If there are concerns with the conditions and limitations of the approval, please notify the DOH. If attempts to resolve the concerns fail, the DOH will deny your application and you may contest the conditions and limitations of this approval, within 28 days of receipt, by filing the enclosed

Request for Adjudicative Proceeding or a document providing substantially the same information with the DOH, Adjudicative Service Unit (ASU), in a manner that shows proof of service on the ASU. The ASU's address is:

DOH - Adjudicative Service Unit  
310 Israel Road SE  
P.O. Box 47879  
Olympia, Washington 98504-7879

You must include a copy of this approval with your application. FILING SHALL NOT BE DEEMED COMPLETE UNTIL THE ADJUDICATIVE SERVICE UNIT ACTUALLY RECEIVES YOUR APPLICATION.

If you have any questions regarding this approval, please contact Ernest McCormick at (509) 946-0624.

Sincerely,



John Martell, Manager  
Radioactive Air Emissions Section

Enclosure: Applicable Portion of License

cc: Robert Anderson, MSA  
Matthew Barnett, PNNL  
John Bates, CHPRC  
Tom Beam, MSA  
Lee Bostic, BNI  
Dennis Bowser, USDOE-ORP  
Jack Donnelly, WRPS  
Dennis Faulk, EPA  
Phil Gent, Ecology  
Robert Haggard, BNI  
Dale Jackson, USDOE-RL  
Steven Killoy, WRPS  
Ernest McCormick, WDOH  
Felix Miera, WRPS  
Valarie Peery, Ecology  
Michael Peloquin, WRPS  
Lucinda Penn, WRPS  
Crystal Rau, Ecology  
John Schmidt, WDOH  
Maria Skorska, Ecology  
Jeff Voogd, WRPS  
Stephen Weil, USDOE-RL  
Davis Zhen, EPA  
Environmental Portal  
RAES Tracking: Line 508; NOC 879; EU  
486

**Project Title**

Removal and Disposal of the Obsolete 242A Evaporator Building K-1 Exhauster  
(Replace NOC 864)

**Approval #    Date Approved    NOC\_ID**

----- Not Approved    879

**Conditions (state only enforceable: WAC 246-247-040(5), 060(5) if not specified)**

- 1) The total abated emission limit for this Notice of Construction is limited to 1.54E-04 mrem/year to the Maximally Exposed Individual (WAC 246-247-040(5)). The total limit on the Potential-To-Emit for this Notice of Construction is limited to 1.54E-04 mrem/year to the Maximally Exposed Individual (WAC 246-247-030(21)).
- 2) The proposed action will be to remove the following equipment:
  - TURBINE BUILDING AND INTERNALS- The sample lines will be contained to reduce the potential for contamination to escape. The equipment will be disposed of as required.
  - STACK MONITORING EQUIPMENT AND CABINET- The sampling lines, which are potentially radiologically contaminated, if removed from the stack and the cabinet and will be contained and disposed of as required.
  - STACK/FANS/MOTORS- The stack may be removed in two sections. The top section is the duct. The bottom section may be disconnected from the fan duct connections and from the concrete slab. Each fan assembly includes a fan, electric motor, support base, inlet air-operated damper, and inlet and outlet flexible connections. The potential for radiological contamination exists within this equipment.
  - CROSSOVER PLENUM - including piping, tubing, and supports will be removed. The air sample lines and instrument sensing lines that originate at the HEPA filter units will be contained to prevent release of internal contamination. The potential for radioactive contamination exists within the crossover plenum.
  - HEPA FILTER UNITS- The HEPA filter units are assumed to be the most radiologically contaminated equipment due to the capture of radiologically contaminated particulates in the pre-filters and HEPA filters. The HEPA units will be removed with the filters left in place to reduce worker exposure. The access doors will be secured and the entire filter housing unit will be filled with grout to encapsulate the waste for land disposal. For each piece of equipment removed, packaging, transport, and disposal will be finalized after the material is characterized. All equipment will be disposed of at an approved disposal facility.

**3) The Annual Possession Quantity is limited to the following radionuclides (Curies/year):**

Alpha - 0	2.08E-08	Beta - 0	1.54E-04
Based on Am-241 All Alpha radioactivity was attributed to Am-241 The total radioactivity for all radionuclides is limited to 1.54E-4 Curies/year		All Beta radioactivity was attributed to Sr-90 The total radioactivity for all radionuclides is limited to 1.54E-4 Curies/year	

- 4) ABATEMENT TECHNOLOGY-ALARACT's  
Controls such as fixatives, covers, wrapping, containment tents, or glove bags will be utilized in accordance with HNF-5183, "Tank Farms Radiological Control Manual." Abatement controls for the following As Low As Reasonably Achievable Control Technology (ALARACT) Demonstrations will also be followed:
  - ALARACT 4.1 Tank Farm ALARACT Demonstration for Packaging and Transportation of Waste.
  - ALARACT 12.1 Tank Farm ALARACT Demonstration for Packaging and Transportation of Equipment And Vehicles.
  - ALARACT 15.1 Tank Farm ALARACT Demonstration for Size Reduction of Waste Equipment for Disposal. (WAC 246-247-060(5))
- 5) WDOH NOTIFICATION-Final Disposal  
WDOH will be notified when the obsolete K-1 Exhauster filters and housing units are grouted and removed as a single unit for final disposal. WDOH will perform a final inspection verifying disposal of the filter and housing unit prior to close-out of this NOC. (WAC 246-247-060(5))
- 6) WDOH NOTIFICATION- Leakage prior to disposal  
If the activities of this NOC are implemented in stages a contamination survey of the filter housing will be performed at a minimum of once every 180 days to verify containment. WDOH will be notified if the activity on the contamination survey exceeds 11,000 dpm/ 100 square centimeter beta activity, smearable at potential leak locations. (WAC 246-247-060(5))
- 7) CONTAMINATION CONTROL- contamination surveys  
At a minimum, pre and post-job contamination surveys (smears) shall be taken. (WAC 246-247-060(5))
- 8) CONTAMINATION CONTROL-Monitoring standards

Radiological monitoring shall be in accordance with the latest revision of HNF-5183, Tank Farms Radiological Control Manual. (WAC 246-247-060(5))

9) CONTAMINATION CONTROL-exceeding Table 2-2 values

Radioactive material with removable contamination levels in excess of 100 times the latest revision of HNF-5183, Tank Farms Radiological Control Manual, Table 2-2 values shall have additional packaging controls such as double wrapping, use of bags or other controls. (WAC 246-247-060(5))

10) CONTAMINATION CONTROL- storage or transportation

A survey is conducted, prior to storage or transportation of waste within the WRPS sites, of the outer most packaging layer to verify that removable contamination meets the requirements of the latest revision of HNF-5183, Tank Farms Radiological Control Manual , Table 2-2. (WAC 246-247-060(5))

11) SOURCE TRACKING-Post isolation

The filters and filter housing unit will be tracked until the filter units have been properly disposed. (WAC 246-247-060(5))

**STATE OF WASHINGTON  
DEPARTMENT OF HEALTH  
ENVIRONMENTAL HEALTH PROGRAMS  
OFFICE OF RADIATION PROTECTION**

In Re The Approval of:  
**Removal and Disposal of the Obsolete 242A  
Evaporator Building K-1 Exhauster  
(Replaces NOC 864) (EU 486)**

Docket No:  
**REQUEST FOR ADJUDICATIVE PROCEEDING**

NOC ID:           **879**  
Approval No:   **AIR 13-512**

THE STATE OF WASHINGTON TO:

**Mr. Kevin W. Smith, Manager  
United States Department of Energy  
Office of River Protection  
P.O. Box 450, MSIN: H6-60  
Richland, Washington 99352-0450**

If you wish to request an adjudicative proceeding, you or your attorney must COMPLETE AND FILE THIS FORM OR A DOCUMENT PROVIDING SUBSTANTIALLY THE SAME INFORMATION WITH THE DEPARTMENT OF HEALTH ADJUDICATIVE SERVICE UNIT WITHIN TWENTY-EIGHT (28) DAYS OF YOUR RECEIPT of this Request for Adjudicative Proceeding form and a copy of the Office of Radiation Protection's approval, **AIR 13-512**.

You must file your application in a manner that shows proof of service on the Adjudicative Service Unit, at the following address:

Department of Health  
Adjudicative Service Unit  
310 Israel Road S.E.  
P.O. Box 47879  
Olympia, WA 98504-7879

With your application, you must include a copy of the Office of Radiation Protection's approval.

**FILING SHALL NOT BE DEEMED COMPLETE UNTIL THE ADJUDICATIVE SERVICE UNIT ACTUALLY RECEIVES YOUR APPLICATION.**

**YOU HAVE THE RIGHT TO a formal hearing in this matter conducted pursuant to Revised Code of Washington (RCW) 43.70.115, Chapter 34.05 RCW, and Chapter 246-10 of the Washington Administrative Code (WAC). Alternatively, you may waive the formal hearing and submit a written statement and supporting documents setting out your position, your defenses, and any mitigating circumstances that you wish to bring to the Department's attention.**

You have the right to be represented by an attorney at your own expense.

**I.**

I **WILL BE** represented by an attorney. His/her name, address, and phone number are:

Name: \_\_\_\_\_

Address: \_\_\_\_\_

Phone: \_\_\_\_\_

I **WILL NOT BE** represented by an attorney.

*If after submitting this request, you obtain attorney representation or change attorneys, you must notify the Adjudicative Service Unit.*

**II.**

I **DO NOT** waive my right to a formal hearing.

I **DO** waive my right to a formal hearing. I understand that if I waive my right to a formal hearing, the Department may decide this matter solely with reference to information in the Department's possession and to such written statements and supporting documents as I may have submitted.

If you choose to waive your right to a formal hearing, please complete the following:

I **AM NOT** submitting documents to the Department in support of my position.

I **AM** submitting a sworn statement and/or other documents to the Department in support of my position. Instructions - Please indicate your responses below:

If you are submitting documents to the Department, please list and briefly identify all such documents in the space provided below and on any additional sheet that may be necessary.

**III.**

ADMISSION/DENIAL OF CONDITIONS OR LIMITATIONS

The Office of Radiation Protection's approval **AIR 13-512**, dated **May 21, 2013**, contains conditions and limitations set out as numbered paragraphs. In the space below you must indicate, in good faith, whether you admit, or do not contest, or deny the conditions or limitations. Conditions or limitations denied or not contested may later be admitted. Conditions or limitations admitted or not contested shall be conclusively deemed true for further proceedings.

Instructions: I admit, deny, or do not contest the conditions or limitations as follows  
(fill in the appropriate paragraph number):

	<u>Admit</u>	<u>Deny</u>	<u>Do Not Contest</u>
Paragraph _____	[ ]	[ ]	[ ]
Paragraph _____	[ ]	[ ]	[ ]
Paragraph _____	[ ]	[ ]	[ ]
Paragraph _____	[ ]	[ ]	[ ]
Paragraph _____	[ ]	[ ]	[ ]
Paragraph _____	[ ]	[ ]	[ ]
Paragraph _____	[ ]	[ ]	[ ]
Paragraph _____	[ ]	[ ]	[ ]

Please attach any additional sheets that may be necessary to respond to all allegations.

If you have chosen not to waive your rights to a formal hearing, please state all grounds for contesting this matter in the space provided below and on any additional sheets that may be necessary.

IV.

You have the right to an interpreter, appointed at no cost, if you are a hearing impaired person or limited English speaking person. If any witness for you is a hearing impaired person or a limited English speaking person, an interpreter will be appointed at your expense.

I **[DO]** / **[DO NOT]** (circle one) request an interpreter be appointed. If an interpreter is requested, please indicate the person or persons for whom an interpreter is required and their primary language, and/or whether they are hearing impaired.

IF YOU FAIL TO FILE YOUR APPLICATION IN A TIMELY MANNER, OR IF YOU FILE YOUR APPLICATION TIMELY BUT FAIL TO APPEAR AT ANY SCHEDULED SETTLEMENT CONFERENCE, PREHEARING CONFERENCE, OR HEARING WITHOUT LEAVE TO DO SO, THE DEPARTMENT MAY DECIDE THIS MATTER WITHOUT YOUR PARTICIPATION AND WITHOUT FURTHER NOTICE TO YOU.

DATED this \_\_\_\_\_ day of \_\_\_\_\_,

\_\_\_\_\_  
Party

\_\_\_\_\_  
Party's Representative (if any)

WSBA #: \_\_\_\_\_