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AIR 15-801

STATE OF WASHINGTON  
DEPARTMENT OF HEALTH

OFFICE OF RADIATION PROTECTION

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August 5, 2015

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

Re: Documentation of Revisions to Emission Unit (EU) Specific Licenses Affected by the Requested Changes to Portable Tank Farm EUs Previously Operated Under Notice of Construction (NOC) 825

References: (see list on page 3)

Mr. Smith:

As part of the revision requests to the portable emission units, "Categorical Tank Farm Facility Waste Retrieval and Closure: Phase II Waste Retrieval Operations" (previously NOC 825), several other emission units were affected. This letter documents the revisions that have been made as a result of the revision requests and that will be included in the next update of the Hanford Site Radioactive Air Emissions License (RAEL) FF-01.

- NOC 825 was obsoleted (as of July 29, 2015).
- The "Categorical Tank Farm Facility Waste Retrieval and Closure: Phase II Waste Retrieval Operations" (previously NOC 825) will no longer be one NOC containing multiple EUs. Each of the EUs will be issued its own operational license with an effective date of July 29, 2015 (NOCs 936 through 943).
- Conditions and controls for EU 486, "200 Area Diffuse/Fugitive" (previously attached to NOC 825) are covered by NOC 945 "Tank Farm Operations Diffuse and Fugitive" and additions made to the new EU licenses (see bullet one).
- Per Reference 5, EUs 1334 and 1343 have been obsoleted (as of July 23, 2015).
- Per Reference 4, NOC 850 was obsoleted (as of July 23, 2015). Closure of NOC 850 affected EUs 50, 486, and 910.
  - EU 50 is now being issued as a final license (NOC 936).
  - EU 910 is currently being issued as a 28-day draft license for review (no NOC).



- EU 486 will be updated at the next revision to the FF-01 license, and will no longer include NOC 850.
- Reference 1 requested a revision to EU 163 (296-S-18). Through discussions with the U.S. Department of Energy (USDOE), it has determined that the revision to EU 163 is not necessary. EU 163 should, instead, go through closure activities to secure the emission unit and the radioactive source term. Upon completion of securing the emission unit, USDOE should request closure of the EU license and listing of the emission unit in Table 2-1 of the FF-01 license.

If you have any questions regarding this letter, please contact Mr. Randy Utley at (509) 946-0534 or, by email, at [randell.utley@doh.wa.gov](mailto:randell.utley@doh.wa.gov).

Sincerely,



John Martell, Manager  
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RAES Tracking: RAES 850 and 15-53; NOC 936-945, EU 50, 57, 58, 163, 486, 498, 749, 885, 886, 1293, 1334, 1343, and 1486

**REFERENCES**

1. Letter 14-ECD-0044 (IM# 8,284), Kevin Smith (USDOE) to John Martell (WDOH), "U.S. Department of Energy, Office of River Protection Transmittal of as Low as Reasonably Achievable Control Technology Demonstration Request Related to Non-Operational Layup", dated September 12, 2014.
2. Letter 15-ECD-0019 (IM# 8,502), Kevin Smith (USDOE) to John Martell (WDOH), "U.S. Department of Energy, Office of River Protection Submits the License Revision Form for Emission Unit 885 (296-P-49, POR 126) and 886 (296-P-50, POR 127) Contained in the Hanford Site Air Operating Permit Number 00-05-006, 'The Department of Energy Hanford Site Radioactive Air Emissions License Number FF-01'", dated April 16, 2015.
3. Letter 15-ECD-0027 (IM# 8,554), Kevin Smith (USDOE) to John Martell (WDOH), "License Revision Request for Notice of Construction Identification Number 825 Contained in the Hanford Site Air Operating Site Air Operating Permit, Permit Number 00-05-006", dated June 10, 2015.
4. Letter 15-ECD-0020 (IM# 8,501), Kevin Smith (USDOE) to John Martell (WDOH), "U.S. Department of Energy, Office of River Protection Submits the Report of Closure for Notice of Construction Identification Number 850 Contained in the Hanford Site Air Operating Permit, Permit Number 00-05-006, Hanford Site Radioactive Air Emissions License Number FF-01", dated April 17, 2015.
5. Letter 15-ECD-0034 (IM# 8633), Kevin Smith (USDOE) to John Martell (WDOH), "U.S. Department of Energy, Office of River Protection Submits the Report of Closure for Emission Units 1334 and 1343 Contained in the Hanford Site Air Operating Site Air Operating Permit, Permit Number 00-05-006", dated July 23, 2015.