

**USDOE – Hanford Site
Richland WA
RAEL-005
Cleaning Rad Contaminated Vehicles (Dif\Fug)
(EU 1465; NOC 1073)**

Licensing File

Table of Contents

- 1) Licensing Checklist
- 2) Other Applicable Documentation (Emails, reports, calculations, etc.)
- 3) Informal Draft EU License
 - a) Licensee Comments on Informal Draft
 - b) Resolution of Comments
- 4) 28 Day Draft
 - a) Licensee Acceptance
 - b) RAES response and explanation of city notification time requirement
- 5) Final License

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LICENSING CHECKLIST

(Rev. 2)

one to one
PREVIOUS: EU 486
NOC 849
NEW: EU 1465
NOC 1073

Please initial boxes, as appropriate, rather than placing a check mark in the box

RAES date received N/A and ~~by~~ assigned LB 475.1

Entered into RAES Tracking/RDIT 10-211. Completeness Review due N/A

To HP3 (responsible for facility) for assignment: J Schmidt

To assigned HP2: Tom F

Add draft Table of Contents and separator pages to file.

Conduct completeness review using "Completeness Review Checklist" and draft "Completeness Notification" letter **within 20 days** of RAES date received. Discuss any concerns/issues with HP3 during this 20 day period.

Place "Completeness Review Checklist" in license file and prepare draft "Completeness Determination" letter. Letter *must go out within 30 days* of RAES date received.

- If application is incomplete, you may need to repeat this (and prior) step(s).
- If application complete, assign NOC ID and EU ID, as appropriate. **Do NOT** obsolete 'old' NOC, EU, etc. before the new final, approved, license is issued (you may have to exclude old from AOP for printing purposes).

Forward license file and draft "Completeness Determination" letter to HP3 for review. (If 28-day draft has already been reviewed by licensee and HP3 and is ready to go out at the 30 day mark, you may combine completeness and 28-day draft.)

HP3 - work with HP2 to resolve any comments then forward license file and draft "Completeness Determination" letter to HSC for review.

HSC - work with HP3 to resolve any comments then forward draft "Completeness Determination" letter to AA3 for finalization (HSC will update RAES Tracking/RDIT upon transmittal and will note the 28-Day Draft Due Date, below, upon returning file to you). You now have **60 days** to issue the official 28-Day Draft Approval letter.

28-Day Draft Due Date: ✓ (See next step, immediately.)

Is it necessary to send the 20-Day City Notification? If yes, prepare **ASAP** and forward to HP3 for review (follow same process as above for letter issuance [HP3 -> HSC -> AA3]). HSC will update RAES Tracking/RDIT upon transmittal and will notify you of 20-Day Comment Due Date, below, upon returning the file to you).

- USDOE-RL Hanford Site is exempt from this requirement.
- If RAEL is part of a Materials or Waste license, the responsibility falls on them to notify the city.
- We issue these notifications for *new licenses or renewals only*; we do not issue them for modifications.

20-Day Comment Due Date: ✓

(see page 2)

Within 40 days _____ of completeness determined, complete thorough review of application and draft license. **Any EU specific conditions must have justification/basis documented in the 'explanation' section of the database.** Discuss any concerns/issues with HP3 during this 40 day period. Also, have HSC do an informal review of the license for consistency before sending to the licensee.

HSC Informal License Review JWS FAS

Send informal draft license to licensee for review, allowing them a **week to 10 days** to get comments back to you. *Be sure to include a 'due date'.*

Upon receipt of response from licensee, resolve any comments/issues/concerns right away and finalize the draft license and transmittal letter (28-day Draft). **At least 3-5 days** before 28-Day Draft Due Date, send license file, draft transmittal letter, and draft license to HP3 for final review.

HP3 approves and forwards license file and draft letter to HSC for review. HSC reviews and forwards to AA3 for finalization (HSC will hold file until licensee receives 28-day draft).

Upon licensee receipt of 28-day draft, HSC will update RAES Tracking/RDTT, verify database concurrence, and return license file to HP2 with due date for licensee response or final issuance of license.

Final Due Date: 1/9/19

Once licensee has accepted, or the 28 days has expired (**no more than 2-3 days before**), obtain an approval number (AIR#) from AA3 and prepare final license and "Final Approval" letter. Send license file (*be sure table of contents provides for final letter/license*), final transmittal letter, and final license to HP3 for final review.

HP3 approves and forwards to HSC for review. HSC forwards to AA3 for finalization.

HSC finalizes:

- Add final letter(s)
- Update RAES Tracking/RDTT
- Verify database concurrence
- Update Licensee List
- Add final file to database 'inbox' to be entered/scanned

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- o EU 486 200 area Diffuse and Fugitive New NOC 1067 (Line 16-186)

NOC810 WRAP Combine into NOC 847 consolidation Close NOC 810 for EU 486
 NOC 838 Roof Replacement Central Plateau- Combine into NOC 847 consolidation
 NOC 847 Stabilization activities, Central Plateau-Core NOC other NOC added for
 consolidation New NOC 1067

Frazier:

Highlighted items are being worked on by Ernest.

All through showing

- *o NOC 848 Operation of the Integrated Disposal Facility – New EU 1464 NOC 1068 working on draft (Line ???) *- Reed - In for*
- *o NOC 849 Cleaning Radiologically Contaminated Vehicles –New EU 1464 New NOC 1068 working on draft. (Line ???) *- Reed - In for*
- o NOC 851 Decontamination Trailer at the Transuranic Waste Retrieval Project EU 1243-1244 486 EU 486 needs to be issued. – *Shandra to review* *- Frank - In for*

Final License issued for EU 1243 and 1244 9/12/2016 – New EU for 486 need to draft conditions. (Line 16-140)

license file Draft Conditions

- o NOC 830 Consolidated T Plant Operations- Reissue EU 314 for T-Plant Operations New NOC 1041. Need closure paperwork for EU 486 from USDOE (Line ???) *- Frank - In for*

NOC 830 EU 447 will be captured under Core PTRAEU NOC 837 (Ernest see above)

Start in

NOC 810 WRAP EU 193 486 1183 Draft new NOCs for EU 193 and 1183. *1 to 1 closure - Need to start*

NOC 810 EU 486 activities for WRAP to be moved into new 486 NOC (Ernest see above)

If fixed comment form 10-20 email submit to schmidt or 25 day.

- o NOC 804 Operation of the TRU waste retrieval 455 486 755 (NOC 1035) 756 (1036) 1181 (1038) 1322 (NOC 1037) 1326 (NOC 1039) 1327 (NOC 1040) – New EU 1440 NOC 1042 TRU for EU 486 close EU 486 out of NOC 804 Draft Informal License sent to DOE for comment. (Lines 16 148 thru 153 and 191) *- Get comment from Frank*

NOC 804 EU 455 activities will be captured under HEPA Vac NOC (Ernest see above).

Laws:

Drafting conditions for the following:
 Pretreatment Facility (PT or PTF)

1. NOC 1062 PT-54 (EU 543) RFD/PJM PJV Exhaust System

One to One Status:

Persons with no One to One Responsibilities: Ben Conroy, Crystal Mathey, Dan Beers

McCormick:

- NOC 838 Roof Replacement 447 455 476 486 See EUs Below

- *EU 447 PTREAU*

NOC 830 Consolidated T Plant Operations – Combine into NOC 837 as necessary Close NOC 830 for EU 447
NOC 837 PTREAU –Keep as core NOC
NOC 838 Roof Replacement, Central Plateau- Combine into NOC 837 as necessary close NOC 838

- *EU 455 HEPA VAC*

NOC 663 HEPA Filtered Vacuum Radioactive Air Emission Units- **Keep as core NOC**
NOC 804 Operation of the Transuranic Waste Retrieval Project- Combine into NOC 663 as necessary Close NOC 804 for EU 455
NOC 838 Roof Replacement, Central Plateau- Combine into NOC 663 as necessary close NOC 838 for EU 445

- *EU 476 Guzzler New NOC Tank Farms 1064 New EU1449 New NOC Site Wide 1072 EU 476 (Line ???)*

NOC 774 Guzzler in tank farm facilities-New EU 1449, NOC 1064 close out of EU 486.
NOC 838 Roof Replacement Central Plateau-Obsolete- Combine into NOC 860 close NOC 838 for EU 774
NOC 860 Guzzler on Hanford Site - Keep as core NOC New NOC 1072

- Tank Farms (Waiting on revision paperwork)
 - AN Tank Farm – 735, (NOC 1022) and 736 (NOC 1025) (Line 16-154 and 155)
 - AW Tank Farm – 855 (NOC 1026) and 856 (NOC 1027) (Line 16-156 and 157)
 - AP Tank Farm – 1328 (NOC 1328) and 1329 (NOC 1029) (Line 16-158 and 159)
 - SY Tank Farm – 1335 (NOC 1030) and 1342(NOC 1031) (Line 16-160 and 161)

2. NOC 1061 PT-S3 (EU 534) PVP/PVV Exhaust System
3. NOC 1060 PT-S2 (EU 546) C5V Exhaust System
4. NOC 1059 PT-S1 (EU 545) C3V Exhaust System
5. NOC 1058 PT-C2 (EU 544) C2V Exhaust System

Low Activity Waste Facility (LAW)

6. NOC 1057 LV-S3 (EU 547) Combined Melter Offgas/Vessel Vent Exhaust System
7. NOC 1056 LV-S2 (EU 550) C5V Exhaust System
8. NOC 1055 LV-S1 (EU 549) C3V Exhaust System
9. NOC 1054 LV-C2 (EU 548) C2V Exhaust System

High Level Waste Facility (HLW)

10. NOC 1053 HV-S4 (EU 552) RFD/PJM PJV Exhaust System
11. NOC 1052 HV-S3a (EU 551) Melter 1 Offgas/Vessel Vent Exhaust System
12. NOC 1051 HV-S3b (EU 753) Melter 2 Offgas/Vessel Vent Exhaust System
13. NOC 1050 HV-S2 (EU 555) C5V Exhaust System
14. NOC 1049 HV-S1 (EU 554) C3V Exhaust System
15. NOC 1048HV-C2 (EU 553) C2V Exhaust System
16. NOC 1047 IHLW-S1 (EU 754) IHLW Canister Ventilation Exhaust System

Laboratory Facility (LAB) a.k.a. Analytical Radiological Laboratory (ARL)

17. NOC 1046 LB-S2 (EU 559) C5V Exhaust System
18. NOC 1045 LB-S1 (EU 558) C3V Exhaust System
19. NOC 1044LB-C2 (EU 557) C2V Exhaust System

Completed Items:

Final License issued for EU 472 and 473 (Trench 31 and 34) on 9/12/2015 Frazier

Final License issued for EU 1243 and 1244 (TRU Decon Trailers) on 9/12/2016 Frazier Still need to issue a new EU to cover EU 486.

Frazier, Thomas (DOH)

From: McCormick, Ernest R (DOH)
Sent: Friday, October 14, 2016 11:26 AM
To: Frazier, Thomas (DOH)
Cc: Utley, Randell J (DOH)
Subject: New EU numbers.

Tom

I generated New EU and NOC as listed below.

AEI Number: 200 Area Diffuse/Fugitive - TRU Retrieval (currently NOC (804) EU 1440 TRU Waste Retrieval Diffuse and Fugitive Operation (Replaces NOC 804)
AEI Number: 200 Area Diffuse/Fugitive – IDF (currently NOC 713) Plant ID 277 Integrated Disposal Facility (IDF) EU 1464 Integrated Disposal Facility (IDF) NOC 1068
AEI Number: 200 Area Diffuse/Fugitive – Cleaning Rad Contaminated Vehicles (currently NOC 849)
TRU Decon Trailers Plant ID 1 Miscellaneous Support Facilities EU 1462 Decon Trailers TRU Waste Retrieval (Diff/Fug) (note plural on trailers) NOC 1069
Need AEI_ID similar to EU 1243 Decon Trailer TRU Waste Retrieval (Intermit. Op.) 200 W-TRUDECON-001

From: Schmidt, John W (DOH) [<mailto:John.Schmidt@DOH.WA.GOV>]
Sent: Thursday, October 13, 2016 9:08 AM
To: Kaldor, Reed A <Reed_A_Kaldor@rl.gov>
Cc: Faust, Eric T <Eric.Faust@rl.doe.gov>; Carleo, Frank J <Frank_J_Carleo@rl.gov>; Frazier, Thomas DOH <thomas.frazier@doh.wa.gov>
Subject: Re: AEI Numbers

Thank you...I think they are the only thing Tom is waiting on for TRU retrieval

Sent from my iPhone

On Oct 12, 2016, at 4:33 PM, Kaldor, Reed A <Reed_A_Kaldor@rl.gov> wrote:

Yes, I started working on them. I should be able to have them to Tom tomorrow morning.

From: Schmidt, John W (DOH) [<mailto:John.Schmidt@DOH.WA.GOV>]
Sent: Wednesday, October 12, 2016 3:05 PM
To: Kaldor, Reed A <Reed_A_Kaldor@rl.gov>
Cc: Faust, Eric T <Eric.Faust@rl.doe.gov>; Carleo, Frank J <Frank_J_Carleo@rl.gov>; Frazier, Thomas DOH <thomas.frazier@doh.wa.gov>
Subject: RE: AEI Numbers

I missed coping Tom ☺

From: Schmidt, John W (DOH)
Sent: Wednesday, October 12, 2016 3:03 PM

To: 'Kaldor, Reed A' <Reed_A_Kaldor@rl.gov>

Cc: 'Faust, Eric T' <Eric.Faust@rl.doe.gov>; 'Carleo, Frank J' <Frank_J_Carleo@rl.gov>

Subject: AEI Numbers

Reed,

Did you make any progress on the AEI numbers. Tom is close to issuing the TRU Retrieval Licenses and needs the AEI for the EU 486 D/F replacement. Thanks

Frazier, Thomas (DOH)

From: Kaldor, Reed A <Reed_A_Kaldor@rl.gov>
Sent: Thursday, October 13, 2016 10:31 AM
To: Frazier, Thomas (DOH)
Cc: Faust, Eric T; Carleo, Frank J; Schmidt, John W (DOH); Homan, Nancy A; Fritz, Gary
Subject: RE: AEI Numbers

Tom -

As mentioned on the phone, we already have AEI numbers in our database for these units/NOCs. We want to retain the current nomenclature. As such, here are the AEI numbers for you to use.

AEI Number: 200 Area Diffuse/Fugitive - TRU Retrieval (currently NOC (804) ✓
AEI Number: 200 Area Diffuse/Fugitive - IDF (currently NOC 713) ✓
AEI Number: 200 Area Diffuse/Fugitive - Cleaning Rad Contaminated Vehicles (currently NOC 849) ✓

Let me know if you need any additional information.

Reed

From: Schmidt, John W (DOH) [mailto:John.Schmidt@DOH.WA.GOV]
Sent: Thursday, October 13, 2016 9:08 AM
To: Kaldor, Reed A <Reed_A_Kaldor@rl.gov>
Cc: Faust, Eric T <Eric.Faust@rl.doe.gov>; Carleo, Frank J <Frank_J_Carleo@rl.gov>; Frazier, Thomas DOH <thomas.frazier@doh.wa.gov>
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From: Schmidt, John W (DOH)
Sent: Wednesday, October 12, 2016 3:03 PM
To: 'Kaldor, Reed A' <Reed_A_Kaldor@rl.gov>

*→ Reed for
decontamination unit
like an AFE AFE
number like their
200 W-TRU ECOZOO*

*mount of
decontamination
workers*

Cc: 'Faust, Eric T' <Eric.Faust@rl.doe.gov>; 'Carleo, Frank J' <Frank_J_Carleo@rl.gov>

Subject: AEI Numbers

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Did you make any progress on the AEI numbers. Tom is close to issuing the TRU Retrieval Licenses and needs the AEI for the EU 486 D/F replacement. Thanks

Frazier, Thomas (DOH)

From: Schmidt, John W (DOH)
Sent: Tuesday, October 11, 2016 7:27 AM
To: Frazier, Thomas (DOH); McCormick, Ernest R (DOH); Utley, Randell J (DOH); Sanders, Cassandra N (DOH); Laws, Gail L (DOH)
Cc: Martell, P John (DOH); Berven, Shawna D (DOH)
Subject: 1 to 1 Status

Just so we are all on the same page. If you have updated information, please send to all.

Please send any informal or formal drafts to me (tank farm/WTP to Randy) before you send them out. We have been catching errors in PTE, Abated doses, and APQ/Release Rates. I hope this eliminates some of the rework we are doing on this.

Thanks

The following is the current path forward for the NOCs currently issued under EU 486. Project must be completed before 12/31/2016, this means we need to have final 28 day drafts by end of November.

NOC 830 Consolidated T-Plant Operations The EU 486 portion is complete and a closure form will be submitted. Tom F

NOC 804 TRU Waste Retrieval - Will be issued with a new EU for the D/F Tom F

NOC 849 Cleaning of Radiologically Contaminated Vehicles. Issue with a new EU for the D/F Tom F

NOC 851 Decontamination Trailer at the TRU Project. Will be issued with a new EU for the D/F Tom F

NOC 848 Operation of IDF - Will be issued with a new EU. Tom F

NOC 810 WRAP, NOC 838 Roof Replacement, NOC 847 Characterization Stabilization Will all be issued under EU 486 Ernest M and Casandra S

Ernest, Tom will need you to help set-up the new EUs for each of his project

Here is a new break out of the list and a status:

EU with Multiple NOC Approvals (RED IS PRIMARY NOC)

447 PTRAEU 837 830 838 Cassandra

455 HEPA Vac 663 804 838 Cassandra

476 Guzzler 860 774 838 Cassandra

486 200 Area D/F 849 848 847 **Randy** 838 Ernest Informal draft sent to DOE

NOC with Multiple EUs

851 TRU Decon Trailers 1243 1244 486 Tom F Final License issued for EU 1243 and 1244 9/12/2016 New EU to replace 486 being drafted.

838 Roof Replacement 447 455 476 486 Ernest/Cassandra

~~834 Trench 31 and 34 472 473 Tom F~~ Final License issued 9/12/2016 Complete

830 T Plant 314 447 486 Tom F EU 486 will be removed from the License Activity is Complete. Awaiting closure form from DOE.

818 AP Vent Upgrade 1328 1329 **Randy**

817 TF Vent. Upgrade 1335 1342 **Randy**

810 AN AW 735 736 855 856 Tom F

809 AN AW 735 736 855 856 **Randy** Modification on its way

- 804 TRU retrieval 455 486 755 756 1181 1322 1326 1327 Tom F Drafting informal licenses new EU will capture D/F of EU486. EU 455 will be captured by Ernest and Cassandra.
- 628 WTP Gail Laws Working with BHI and drafting licenses
- 627 WTP Gail Laws Working with BHI and drafting licenses
- 626 WTP Gail Laws Working with BHI and drafting licenses
- 625 WTP Gail Laws Working with BHI and drafting licenses

Frazier, Thomas (DOH)

From: Schmidt, John W (DOH)
Sent: Wednesday, October 05, 2016 7:53 AM
To: Frazier, Thomas (DOH)
Cc: Berven, Shawna D (DOH); McCormick, Ernest R (DOH); Utley, Randell J (DOH)
Subject: FW: Verification Needed
Attachments: Notes from our EU 486 1 to 1 Meeting

Tom,

I need you to start a file to get the new EU for the D/F of NOC 851 Decontamination Trailer at the TRU Project (old was 486) out. I also need you to start the replacement EU License for the following D/F for EU 486 for the following:

NOC 804 TRU Waste Retrieval - Will be issued with a new EU for the D/F I think you are in the process of sending them an informal draft

NOC 849 Cleaning of Radiologically Contaminated Vehicles. Research if it can be closed or will be issued with a new EU for the D/F Work with Reed K

NOC 848 Operation of IDF - Will be issued with a new EU for the D/F or a revision form will be submitted to move it to an approval to construct. A meeting with ORP will need to be arranged. Work with Frank (Tad when he returns)

Ernest should have made new EUs for you for these 4. Please let Shawna and me know what the EU numbers are so we can track the progress.

Thank you for all your hard work...with the holidays approaching, we will need to step these up to get them out in time to meet the December 30 deadline.

John

From: Schmidt, John W (DOH)
Sent: Monday, October 03, 2016 7:40 AM
To: McCormick, Ernest R (DOH) <Ernest.McCormick@DOH.WA.GOV>; Berven, Shawna D (DOH) <Shawna.Berven@DOH.WA.GOV>; Utley, Randell J (DOH) <Randell.Utley@DOH.WA.GOV>
Cc: Frazier, Thomas (DOH) <Thomas.Frazier@DOH.WA.GOV>
Subject: RE: Verification Needed

We all discussed this over two weeks ago. Please read the attached email.

From: McCormick, Ernest R (DOH)
Sent: Friday, September 30, 2016 2:12 PM
To: Berven, Shawna D (DOH) <Shawna.Berven@DOH.WA.GOV>; Schmidt, John W (DOH) <John.Schmidt@DOH.WA.GOV>; Utley, Randell J (DOH) <Randell.Utley@DOH.WA.GOV>
Cc: Frazier, Thomas (DOH) <Thomas.Frazier@DOH.WA.GOV>
Subject: RE: Verification Needed

Shawna

As far as I know there has been no discussion of closing NOC 851 Decon Trailer and EU 486. This should fall under the consolidated central plateau diffuse and fugitive that will retain the NOC 486 but we need to include it in the discussion. It should be deleted once we have the consolidated central plateau diffuse/fugitive in place. Check on my weekly update for a listing of where each NOC should stand.

Ernest

From: Berven, Shawna D (DOH)
Sent: Friday, September 30, 2016 12:48 PM
To: Schmidt, John W (DOH); Uteley, Randell J (DOH)
Cc: Frazier, Thomas (DOH); McCormick, Ernest R (DOH)
Subject: Verification Needed

NOC 851 had 3 EUs associated with it (1243, 1244, and 486) before Tom did the one-to-one update.

The two letters we sent involved 1243 and 1244...assigning them both new NOCs.

Schmidt and I went in and obsoleted the two EUs from NOC 851, but we did NOT obsolete the entire NOC. Someone else must have gone in and done that.

As far as I can tell, NOC 851 should still be associated with EU 486...but I don't want to change anything until I get clarification.

Also, no notification was sent to DOE stating that NOC 851 was being removed from EU 486...at least, not that I am aware of.

Frazier, Thomas (DOH)

From: Schmidt, John W (DOH)
Sent: Wednesday, September 14, 2016 3:27 PM
To: Kaldor, Reed A
Cc: Frazier, Thomas (DOH); Faust, Eric T; Marple, Candice E
Subject: Re: Notes from our EU 486 1 to 1 Meeting

Reed,

Who should Tom work with on getting this reissued?

Sent from my iPhone

On Sep 14, 2016, at 2:59 PM, Kaldor, Reed A <Reed_A_Kaldor@rl.gov> wrote:

John -

I contacted our crane and rigging organization and they would like to keep this NOC open and available for use. Let me know if you need any more information. Thanks.

Reed

From: Schmidt, John W (DOH) [mailto:John.Schmidt@DOH.WA.GOV]
Sent: Tuesday, September 13, 2016 8:36 AM
To: Carleo, Frank J <Frank_J_Carleo@rl.gov>; Faust, Eric T <Eric.Faust@rl.doe.gov>; Kaldor, Reed A <Reed_A_Kaldor@rl.gov>
Cc: Utley, Randell <Randell.Utley@doh.wa.gov>; Sanders, Cassandra N (DOH) <cassandra.sanders@doh.wa.gov>; McCann, Susette L (DOH) <susette.mccann@doh.wa.gov>; Frazier, Thomas DOH <thomas.frazier@doh.wa.gov>; Berven, Shawna <Shawna.Berven@doh.wa.gov>
Subject: Notes from our EU 486 1 to 1 Meeting

Please make corrections if you have a different understanding:

The following is the current path forward for the NOCs currently issued under EU 486. Project must be completed before 12/31/2016.

NOC 830 Consolidated T-Plant Operations The EU 486 portion is complete and a closure form will be submitted. Tom F

~~NOC 804 TRU Waste Retrieval Will be issued with a new EU for the D/F Tom F~~

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~~NOC 848 Operation of IDF Will be issued with a new EU for the D/F or a revision form will be submitted to move it to an approval to construct. A meeting with ORP will need to be arranged. Tom~~

F

NOC 810 WRAP, NOC 838 Roof Replacement, NOC 847 Characterization Stabilization Will all be issued under EU 486 Ernest M and Casandra S

Ernest, Tom will need you to help set-up the new EUs for each of his projects.

Please let me know if you have any comments or questions.

Frazier, Thomas (DOH)

From: Schmidt, John W (DOH)
Sent: Wednesday, September 14, 2016 3:22 PM
To: Faust, Eric T
Cc: Utley, Randell J (DOH); Sanders, Cassandra N (DOH); McCann, Susette L (DOH); Frazier, Thomas (DOH); Berven, Shawna D (DOH); Carleo, Frank J; Kaldor, Reed A; Karschnia, Paul T; Engelmann, Richard H; Bowser, Dennis W; Trimberger, Bryan R
Subject: Re: Notes from our EU 486 1 to 1 Meeting

Thank you. Tom F will be working with Frank to get it reissued.

Sent from my iPhone

On Sep 14, 2016, at 11:17 AM, Faust, Eric T <Eric.Faust@rl.doe.gov> wrote:

John,

It would be best for DOE to keep NOC 848 / Operation of the IDF as a separate emission unit that retains the ability to operate. The IDF is currently a RCRA permitted facility and needs to maintain the capability of receiving waste. If we move it to an approval to construct, this would burden DOE to re-permit the facility to operate at a later date.

If you have any questions, please contact me on 376-9607.

Thanks,
Eric

From: Schmidt, John W (DOH) [<mailto:John.Schmidt@DOH.WA.GOV>]
Sent: Tuesday, September 13, 2016 8:36 AM
To: Carleo, Frank J <Frank.J.Carleo@rl.gov>; Faust, Eric T <Eric.Faust@rl.doe.gov>; Kaldor, Reed A <Reed.A.Kaldor@rl.gov>
Cc: Utley, Randell <Randell.Utley@doh.wa.gov>; Sanders, Cassandra N (DOH) <cassandra.sanders@doh.wa.gov>; McCann, Susette L (DOH) <susette.mccann@doh.wa.gov>; Frazier, Thomas DOH <thomas.frazier@doh.wa.gov>; Berven, Shawna <Shawna.Berven@doh.wa.gov>
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Ernest, Tom will need you to help set-up the new EUs for each of his projects.

Please let me know if you have any comments or questions.

Frazier, Thomas (DOH)

From: Schmidt, John W (DOH)
Sent: Tuesday, September 13, 2016 8:36 AM
To: Carleo, Frank J; Faust, Eric T; Kaldor, Reed A
Cc: Utley, Randell J (DOH); Sanders, Cassandra N (DOH); McCann, Susette L (DOH); Frazier, Thomas (DOH); Berven, Shawna D (DOH)
Subject: Notes from our EU 486 1 to 1 Meeting

Please make corrections if you have a different understanding:

The following is the current path forward for the NOCs currently issued under EU 486. Project must be completed before 12/31/2016.

NOC 830 Consolidated T-Plant Operations The EU 486 portion is complete and a closure form will be submitted. Tom F

NOC 804 TRU Waste Retrieval - Will be issued with a new EU for the D/F Tom F

NOC 849 Cleaning of Radiologically Contaminated Vehicles. Research if it can be closed or will be issued with a new EU for the D/F Tom F

NOC 851 Decontamination Trailer at the TRU Project. Will be issued with a new EU for the D/F Tom F

NOC 848 Operation of IDF - Will be issued with a new EU for the D/F or a revision form will be submitted to move it to an approval to construct. A meeting with ORP will need to be arranged. Tom F

NOC 810 WRAP, NOC 838 Roof Replacement, NOC 847 Characterization Stabilization Will all be issued under EU 486 Ernest M and Casandra S

Ernest, Tom will need you to help set-up the new EUs for each of his projects.

Please let me know if you have any comments or questions.

3

200 200-RCV-001

Cleaning Rad Contaminated Vehicles(Dif\Fug)

This is a MINOR, FUGITIVE, non-point source emission unit.

Miscellaneous Support Facilities

Abatement Technology BARCT WAC 246-247-040(3), 040(4)

state only enforceable: WAC 246-247-010(4), 040(5), 060(5)

Zone or Area	Abatement Technology	Required # of Units	Additional Description
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Monitoring Requirements

state enforceable: WAC 246-247-040(5), 060(5), and federally enforceable: 40 CFR 61 subpart H

Federal and State Regulatory	Monitoring and Testing Requirements	Radionuclides Requiring Measurement	Sampling Frequency
	Hanford Site Near-Facility Environmental Ambient Monitoring Program	alpha/beta/gamma	Per the sitewide ambient monitoring program, samples will be collected from the existing near-facility monitoring stations

Need Cite for

Sampling Requirements Radiological field surveys and near field monitoring

Additional Requirements

Additional monitoring or sampling requirements established by this License will be listed in the Conditions and Limitations section, if applicable.

Operational Status Cleaning of radiologically contaminated vehicles on the central Plateau.

This Emission Unit has 1 active Notice(s) of Construction.

Project Title	Approval #	Date Approved	NOC_ID
Cleaning Radiologically Contaminated Vehicles (Replaced NOC DA 849)		Not Approved	1073

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 3.40E-05 mrem/year to the Maximally Exposed Individual (WAC 246-247-040(5)).
- 2) This approval applies only to those activities described below. No additional activities or variations on the approved activities that constitute a "modification" to the emission unit, as defined in WAC 246-247-030(16), may be conducted.

cleaning Radiologically Contaminated Vehicles (RCVs) and/or radiologically contaminated components (e.g., radiator) of an RCV. ^{new paragraph} A portable, commercially available, high-pressure, water/steam cleaning unit could be deployed to the location of the RCV/component, or the RCV/component (after appropriate precautions to isolate and contain smearable contamination) could be moved to some other location in the 200 Areas plateau before cleaning. Cleaning may also involve brushing, scrubbing, or other manual methods conducted in a manner to minimize airborne dust.

A RCV/component could be isolated with an engineered shelter over a basin. The basin could be a collapsible liner for collection of waste water. The shelter could be a galvanized steel tube framework with arched trusses and covered with polyester sheeting. Alternatively, the activity could be conducted without a shelter over the basin (i.e., open air) with reasonable operational controls (e.g., directing water/steam cleaning stream downward, concentrating stream on RCVs or components, using lowest possible pressure settings) being implemented.

A portable high-pressure, commercially available, water/steam washing unit could be used to clean the RCV/component. Personnel would direct the cleaning stream to areas of localized areas of contamination on the RCV/component. The RCV/component would be surveyed intermittently (e.g., hand-held field

instruments, swipes, or dried sample analysis [for alpha] as necessary) to determine level of remaining contamination. This process would be repeated until sufficient decontamination is achieved, as determined by Radiation Protection personnel, to allow the RCV/component to be returned to service (i.e., no smearable contamination remains, and a fixed contamination level of no greater than 0.5 millirem/hour dose rate).

After decontamination to appropriate levels, the RCV/component would be removed from the shelter, if used, and basin. The RCV/component could be returned to service, or if necessary, appropriately packaged and disposed. Contaminated waste materials resulting from the cleaning processes, including waste water, will be packaged appropriately using standard procedures and dispositioned to approved storage or disposal. Activities could include solidification of liquid waste (such as absorbing liquids in tanks, containers; low-temperature [i.e., less than 100 degrees Celsius] evaporation) and subsequent transfer to appropriate on- or off site treatment/disposal facilities.

The shelter (if used) and basin would be surveyed at the end of the cleaning process to ensure appropriate radiological controls are in place. The shelter/basin would be decontaminated appropriately and maintained for future cleaning activities. If necessary, the shelter/basin could be packaged and disposed.

High-efficiency particulate air (HEPA) -filtered vacuums or portable/temporary radionuclide air emission units (PTRAEUs) may be used to support the cleaning activities.

- 3) The PTE for this project as determined under WAC 246-247-030(21)(a-e) [as specified in the application] is 3.40E-05 mrem/year. Approved are the associated potential release rates (Curies/year) of:

Alpha - 0	1.50E-06	Liquid/Particulate Solid	WAC 246-247-030(21)(a)
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Alpha release rate based on Am-241. Any radionuclide might be present in the RCV cleaning activities. Am-241 is representative of the alpha-emitting radionuclides present in/on the RCV/component and would be typical in the wastestream created.

B/G - 0	2.90E-05	Liquid/Particulate Solid	WAC 246-247-030(21)(a)
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Beta/Gamma release based on Cs-137. Any radionuclide might be present in the RCV cleaning activities. Cs-137 is representative of the beta-gamma radionuclides present in/on the RCV/component and would be typical in the wastestream created.

The potential release rates described in this Condition were used to determine control technologies and monitoring requirements for this approval. DOE must notify the Department of a "modification" to the emission unit, as defined in WAC 246-247-030(16). DOE must notify the Department of any changes to a NESHAP major emission unit when a specific isotope is newly identified as contributing greater than 10% of the potential TEDE to the MEI, or greater than 25% of the TEDE to the MEI after controls. (WAC 246-247-110(9)) DOE must notify the Department of any changes to potential release rates as required by state or federal regulations including changes that would constitute a significant modification to the Air Operating Permit under WAC 173-401-725(4). Notice will be provided according to the particular regulation under which notification is required. If the applicable regulation(s) does not address manner and type of notification, DOE will provide the Department with advance written notice by letter or electronic mail but not solely by copies of documents.

- 4) CONTAMINATION CONTROL-PTREAU/HEPA Vac Use Authorized
If a portable/temporary radioactive air emission unit (PTRAEU) or HEPA filtered vacuum is used, controls as described in the sitewide NOC (i.e., DOE/RL-96-75 or DOE/RL-97-50) and in the associated license would be followed. (citation?) ?
- 5) CONTAMINATION CONTROL-Follow RWP
The cleaning operations shall be performed in accordance with the controls specified in a radiation work permit (RWP) and/or operating procedures. (citation?)
- 6) CONTAMINATION CONTROL-Routine Field Surveys Required
All activities shall be conducted under the auspices of radiological control technicians. Routine field surveys, including swipes/smears, shall be conducted. Fixatives, covers, or other standard measures shall be used to contain contamination. (citation?)
- 7) CONTAMINATION CONTROL-Spill Prevention Required
Appropriate spill prevention procedures shall be in place to minimize the probability of a release of radioactive

liquid waste to the environment, and to provide immediate cleanup of any liquid spills. (Citation?)

8) WDOH NOTIFICATION-Limits on Contamination

Low risk radiological activities (i.e., less than or equal to 100,000 dpm/100 cm² beta-gamma and less than or equal to 2,000 dpm/100 cm² alpha) will be completed under this NOC implementing the following controls:

- Pre and post-job surveys will be performed and maintained as records of low emissions.
- A basin will be erected to contain radioactive contamination.
- Splashguards will be installed to contain spray water, and ensure waste water is directed toward and collected in the basin.
- All radioactive contamination removed during the decontamination process shall be contained, packaged, or disposed of within the same day.
- The basin surfaces shall be maintained to less than 1,000 dpm/100 cm² beta-gamma and 20 dpm/100cm² alpha when not in use.

For those activities considered medium risk radiological activities (i.e., greater than 100,000 dpm/100 cm² to less than or equal to 1,000,000 dpm/cm² beta-gamma and greater than 2,000 dpm/100 cm² to less than or equal to 20,000 dpm/cm² alpha), DOE will contact WDOH to discuss the additional controls that will be implemented for limiting radiological air emissions.

This NOC will not be used for high risk radiological activities.

(Citation?)

Frazier, Thomas (DOH)

From: Faust, Eric T <Eric.Faust@rl.doe.gov>
Sent: Thursday, December 01, 2016 11:15 AM
To: Frazier, Thomas (DOH)
Cc: Kaldor, Reed A; Karschnia, Paul T; Carleo, Frank J; Schmidt, John W (DOH)
Subject: RE: Preliminary Drafts of Licenses for Decon Trailers TRU Waste Retrieval (NOC 1069), Cleaning Rad Contaminated Vehicles (NOC 1073), and Integrated Disposal Facility Operation (NOC 1068)

Tom,

After going over the IDF, TRU Retrieval, and RCV EUs, CHPRC had a few minor comments:

IDF (NOC 1068) – The total abated limit mentioned within Condition 1 gives a value of 4.80E-01. The standing permit license mentions 4.85E-01 mrem/yr.

TRU Retrieval (NOC 1069) – The abated and unabated emission limits within Condition 1 and 3 state that “The emission unit does not have an abated/unabated PTE.” The standing license shows 1.55E-5 mrem/yr for both the abated and unabated PTE limits.

RCVs (1073)– We have no comments.

Thanks and please contact myself or Tad / Frank if you have any questions,

Eric

From: Kaldor, Reed A
Sent: Wednesday, November 30, 2016 1:08 PM
To: Frazier, Thomas DOH <thomas.frazier@doh.wa.gov>
Cc: Faust, Eric T <Eric.Faust@rl.doe.gov>
Subject: RE: Preliminary Drafts of Licenses for Decon Trailers TRU Waste Retrieval (NOC 1069), Cleaning Rad Contaminated Vehicles (NOC 1073), and Integrated Disposal Facility Operation (NOC 1068)

Tom –

I have no comments for EU 1465 NOC 1073. Thanks.

Reed

From: Frazier, Thomas (DOH) [mailto:Thomas.Frazier@DOH.WA.GOV]
Sent: Thursday, November 17, 2016 2:42 PM
To: Faust, Eric T <Eric.Faust@rl.doe.gov>
Cc: Carleo, Frank J <Frank_J_Carleo@rl.gov>; Kaldor, Reed A <Reed_A_Kaldor@rl.gov>; Schmidt, John <john.schmidt@doh.wa.gov>
Subject: Preliminary Drafts of Licenses for Decon Trailers TRU Waste Retrieval (NOC 1069), Cleaning Rad Contaminated Vehicles (NOC 1073), and Integrated Disposal Facility Operation (NOC 1068)

4

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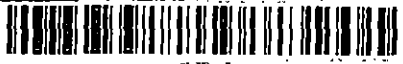
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- Attach this card to the back of the mailpiece, or on the front if space permits.

MR DOUG SHOOP - MANAGER
USDOE - RL
PO BOX 550 MSIN A5-14
RICHLAND WA 99352



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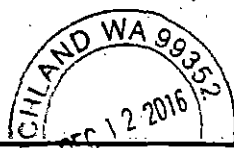
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[Signature] Agent Addressee

B. Received by (Printed Name) [Signature]

C. Date of Delivery 12/16/16

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If YES, enter delivery address below: _____



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DUPLICATE



LB# 4887

AIR 16-1205
NOC 1073

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

December 8, 2016

CERTIFIED MAIL

7015 0640 0007 5050 7920

Mr. Doug Shoop, Manager
United States Department of Energy
Richland Operations Office
P.O. Box 550, MSIN: A5-14
Richland, Washington 99352

Re: 28-Day Draft Approval of Notice of Construction (NOC) 1073

Reference: Email (LB# 4751), from John Schmidt (WDOH) to Multiple-USDOE Staff, "NOC Consolidation", dated June 30, 2016.

Mr. Shoop:

As per the reference email, we have worked with your staff to make changes to move the NOCs and/or Emission Units (EUs) associated with this license from a one-to-many, to a one-to-one relationship. We appreciate your cooperation and willingness to support our future database needs and to make license actions more efficient and cost effective moving forward.

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

**Cleaning Radiologically Contaminated Vehicles (Replaced NOC 849)
(EU 1465; NOC 1073)**

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 this letter, 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 a 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 98352
FAX: (509) 946-0876

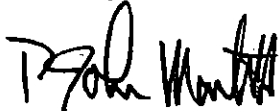
If there are concerns with the conditions and limitations of the approval, please notify the DOH. If attempts to resolve the concerns fail, the DOH will deny your application and you may contest the conditions and limitations of this approval, within 28 days of receipt, by filing the enclosed Request 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 Thomas Frazier at thomas.frazier@doh.wa.gov or, by phone, at (509) 946-0774.

Sincerely,



John Martell, Manager
Radioactive Air Emissions Section

Enclosures: (1) Conditions and Limitations for EU 1465 (NOC 1073)
(2) Request for Adjudicative Proceedings

cc: (see next page)

200 200-RCV-001**Cleaning Rad Contaminated Vehicles(Dif\Fug)**

This is a MINOR, FUGITIVE, non-point source emission unit.

Miscellaneous Support Facilities

Abatement Technology BARCT WAC 246-247-040(3), 040(4)

state only enforceable: WAC 246-247-010(4), 040(5), 060(5)

Zone or Area	Abatement Technology	Required # of Units	Additional Description
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Monitoring Requirements

state enforceable: WAC 246-247-040(5), 060(5), and federally enforceable: 40 CFR 61 subpart H

Federal and State Regulatory	Monitoring and Testing Requirements	Radionuclides Requiring Measurement	Sampling Frequency
WAC 246-247-040(5) & WAC 246-247-060(5)	Hanford Site Near-Facility Environmental Ambient Monitoring Program	Alpha/Beta/Gamma	Per the sitewide ambient monitoring program, samples will be collected from the existing near-facility monitoring stations.

Sampling Requirements Radiological field surveys and near field monitoring**Additional Requirements**

Additional monitoring or sampling requirements established by this License will be listed in the Conditions and Limitations section, if applicable.

Operational Status Cleaning of radiologically contaminated vehicles on the Central Plateau.**This Emission Unit has 1 active Notice(s) of Construction.****Project Title****Approval #** **Date Approved** **NOC_ID**

Cleaning Radiologically Contaminated Vehicles (Replaced NOC 849)

Not Approved 1073

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 3.40E-05 mrem/year to the Maximally Exposed Individual (WAC 246-247-040(5)).
- 2) This approval applies only to those activities described below. No additional activities or variations on the approved activities that constitute a "modification" to the emission unit, as defined in WAC 246-247-030(16), may be conducted.

cleaning Radiologically Contaminated Vehicles (RCVs) and/or radiologically contaminated components (e.g., radiator) of an RCV.

A portable, commercially available, high-pressure, water/steam cleaning unit could be deployed to the location of the RCV/component, or the RCV/component (after appropriate precautions to isolate and contain smearable contamination) could be moved to some other location in the 200 Areas plateau before cleaning. Cleaning may also involve brushing, scrubbing, or other manual methods conducted in a manner to minimize airborne dust.

A RCV/component could be isolated with an engineered shelter over a basin. The basin could be a collapsible liner for collection of waste water. The shelter could be a galvanized steel tube framework with arched trusses and covered with polyester sheeting. Alternatively, the activity could be conducted without a shelter over the basin (i.e., open air) with reasonable operational controls (e.g., directing water/steam cleaning stream downward, concentrating stream on RCVs or components, using lowest possible pressure settings) being implemented.

A portable high-pressure, commercially available, water/steam washing unit could be used to clean the RCV/component. Personnel would direct the cleaning stream to areas of localized areas of contamination on

Appropriate spill prevention procedures shall be in place to minimize the probability of a release of radioactive liquid waste to the environment, and to provide immediate cleanup of any liquid spills. (WAC 246-247-040(5) and WAC 246-247-060(5))

8) WDOH NOTIFICATION-Limits on Contamination

Low risk radiological activities (i.e., less than or equal to 100,000 dpm/100 cm² beta-gamma and less than or equal to 2,000 dpm/100 cm² alpha) will be completed under this NOC implementing the following controls:

- Pre and post-job surveys will be performed and maintained as records of low emissions.
- A basin will be erected to contain radioactive contamination.
- Splashguards will be installed to contain spray water, and ensure waste water is directed toward and collected in the basin.
- All radioactive contamination removed during the decontamination process shall be contained, packaged, or disposed of within the same day.
- The basin surfaces shall be maintained to less than 1,000 dpm/100 cm² beta-gamma and 20 dpm/100cm² alpha when not in use.

For those activities considered medium risk radiological activities (i.e., greater than 100,000 dpm/100 cm² to less than or equal to 1,000,000 dpm/cm² beta-gamma and greater than 2,000 dpm/100 cm² to less than or equal to 20,000 dpm/cm² alpha), DOE will contact WDOH to discuss the additional controls that will be implemented for limiting radiological air emissions.

This NOC will not be used for high risk radiological activities. (WAC 246-247-040(5) and WAC 246-247-060(5))

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

Docket No:
REQUEST FOR ADJUDICATIVE PROCEEDING

Approval No:
AIR 16-1205

In Re The Approval of:
**Cleaning Radiologically Contaminated Vehicles (Replaced NOC 849)
(NOC 1073; EU 1465)**

THE STATE OF WASHINGTON TO:

**Mr. Doug Shoop, Manager
United States Department of Energy
Richland Operations Office
P.O. Box 550, MSIN: A5-14
Richland, Washington 99352**

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 16-1205**.

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 16-1205, dated December 8, 2016, 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 _____	[]	[]	[]
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 #: _____

5



LB#4926

AIR 17-118
NOC 1073

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

January 10, 2017

Mr. Doug Shoop, Manager
United States Department of Energy
Richland Operations Office
P.O. Box 550, MSIN: A5-14
Richland, Washington 99352

Re: Final Approval of Notice of Construction (NOC) 1073

Mr. Shoop:

Pursuant to Chapter 246-247 of the Washington Administrative Code (WAC), your revision was approved, as negotiated, on January 9, 2017, according to the enclosed (EU) specific license for:

**Cleaning Radiologically Contaminated Vehicles (Replaced NOC 849)
(EU 1465; NOC 1073)**

The conditions, controls, monitoring requirements, and limitations of this license must be observed in order for you to be in compliance with WAC 246-247. Failure to meet any provision of this license may result in the revocation of approval, the issuance of Notices of Violation, or other enforcement actions under WAC 246-247-100.

If you have any questions regarding this approval, please contact Tom Frazier at Thomas.Frazier@doh.wa.gov or, by phone, at (509) 946-0774.

Sincerely,

John Martell, Manager
Radioactive Air Emissions Section

Enclosure: NOC 1073 for EU 1465

cc: (see next page)



Mr. Doug Shoop
January 10, 2017
Page 2 of 2

AIR 17-118

cc: Ruth Allen, WRPS
Matthew Barnett, PNNL
Lilyann Bauder, Ecology
Shawna Berven, WDOH
Lucinda Borneman, WRPS
Lee Bostic, BNI
Frank Carleo, CHPRC
Cliff Clark, USDOE-RL
Jack Donnelly, WRPS
Rick Engelmann, CHPRC
Dennis Faulk, EPA
Eric Faust, USDOE-RL
Thomas Frazier, WDOH
Gary Fritz, MSA
Phil Gent, Ecology
Reed Kaldor, MSA
Paul Karschnia, CHPRC
Jim McAuley, EPA
John Schmidt, WDOH
Jeff Voogd, WRPS
Environmental Portal
RAES Tracking: Line 16-211; EU 1465; NOC 1073

Emission Unit ID: 1465

200 200-RCV-001

Cleaning Rad Contaminated Vehicles(DifFug)

This is a MINOR, FUGITIVE, non-point source emission unit.

Miscellaneous Support Facilities

Abatement Technology BARCT WAC 246-247-040(3), 040(4)

state only enforceable: WAC 246-247-010(4), 040(5), 060(5)

Zone or Area	Abatement Technology	Required # of Units	Additional Description
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Monitoring Requirements

state enforceable: WAC 246-247-040(5), 060(5), and federally enforceable: 40 CFR 61 subpart H

Federal and State Regulatory	Monitoring and Testing Requirements	Radionuclides Requiring Measurement	Sampling Frequency
WAC 246-247-040(5) & WAC 246-247-060(5)	Hanford Site Near-Facility Environmental Ambient Monitoring Program	Alpha/Beta/Gamma	Per the sitewide ambient monitoring program, samples will be collected from the existing near-facility monitoring stations.

Sampling Requirements Radiological field surveys and near field monitoring

Additional Requirements

*Additional monitoring or sampling requirements established by this License will be listed in the Conditions and Limitations section, if applicable.

Operational Status Cleaning of radiologically contaminated vehicles on the Central Plateau.

This Emission Unit has 1 active Notice(s) of Construction.

Project Title	Approval #	Date Approved	NOC_ID
Cleaning Radiologically Contaminated Vehicles (Replaced NOC 849)	AIR 17-118	1/9/2017	1073

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 3.40E-05 mrem/year to the Maximally Exposed Individual (WAC 246-247-040(5)).
- 2) This approval applies only to those activities described below. No additional activities or variations on the approved activities that constitute a "modification" to the emission unit, as defined in WAC 246-247-030(16), may be conducted.

cleaning Radiologically Contaminated Vehicles (RCVs) and/or radiologically contaminated components (e.g., radiator) of an RCV.

A portable, commercially available, high-pressure, water/steam cleaning unit could be deployed to the location of the RCV/component, or the RCV/component (after appropriate precautions to isolate and contain smearable contamination) could be moved to some other location in the 200 Areas plateau before cleaning. Cleaning may also involve brushing, scrubbing, or other manual methods conducted in a manner to minimize airborne dust.

A RCV/component could be isolated with an engineered shelter over a basin. The basin could be a collapsible liner for collection of waste water. The shelter could be a galvanized steel tube framework with arched trusses and covered with polyester sheeting. Alternatively, the activity could be conducted without a shelter over the basin (i.e., open air) with reasonable operational controls (e.g., directing water/steam cleaning stream downward, concentrating stream on RCVs or components, using lowest possible pressure settings) being implemented.

A portable high-pressure, commercially available, water/steam washing unit could be used to clean the RCV/component. Personnel would direct the cleaning stream to areas of localized areas of contamination on

the RCV/component. The RCV/component would be surveyed intermittently (e.g., hand-held field instruments, swipes, or dried sample analysis [for alpha] as necessary) to determine level of remaining contamination. This process would be repeated until sufficient decontamination is achieved, as determined by Radiation Protection personnel, to allow the RCV/component to be returned to service (i.e., no smearable contamination remains, and a fixed contamination level of no greater than 0.5 millirem/hour dose rate).

After decontamination to appropriate levels, the RCV/component would be removed from the shelter, if used, and basin. The RCV/component could be returned to service, or if necessary, appropriately packaged and disposed. Contaminated waste materials resulting from the cleaning processes, including waste water, will be packaged appropriately using standard procedures and dispositioned to approved storage or disposal. Activities could include solidification of liquid waste (such as absorbing liquids in tanks, containers; low-temperature [i.e., less than 100 degrees Celsius] evaporation) and subsequent transfer to appropriate on- or off site treatment/disposal facilities.

The shelter (if used) and basin would be surveyed at the end of the cleaning process to ensure appropriate radiological controls are in place. The shelter/basin would be decontaminated appropriately and maintained for future cleaning activities. If necessary, the shelter/basin could be packaged and disposed.

High-efficiency particulate air (HEPA) -filtered vacuums or portable/temporary radionuclide air emission units (PTRAEUs) may be used to support the cleaning activities.

- 3) The PTE for this project as determined under WAC 246-247-030(21)(a-e) [as specified in the application] is $3.40E-05$ mrem/year. Approved are the associated potential release rates (Curies/year) of:

Alpha - 0	1.50E-06	Liquid/Particulate Solid	WAC 246-247-030(21)(a)
Alpha release rate based on Am-241. Any radionuclide might be present in the RCV cleaning activities. Am-241 is representative of the alpha-emitting radionuclides present in/on the RCV/component and would be typical in the wastestream created.			
B/G - 0	2.90E-05	Liquid/Particulate Solid	WAC 246-247-030(21)(a)
Beta/Gamma release based on Cs-137. Any radionuclide might be present in the RCV cleaning activities. Cs-137 is representative of the beta-gamma radionuclides present in/on the RCV/component and would be typical in the wastestream created.			

The radioactive isotopes identified for this emission unit are (no quantities specified):

None - 0

The potential release rates described in this Condition were used to determine control technologies and monitoring requirements for this approval. DOE must notify the Department of a "modification" to the emission unit, as defined in WAC 246-247-030(16). DOE must notify the Department of any changes to a NESHAP major emission unit when a specific isotope is newly identified as contributing greater than 10% of the potential TEDE to the MEI, or greater than 25% of the TEDE to the MEI after controls. (WAC 246-247-110(9)) DOE must notify the Department of any changes to potential release rates as required by state or federal regulations including changes that would constitute a significant modification to the Air Operating Permit under WAC 173-401-725(4). Notice will be provided according to the particular regulation under which notification is required. If the applicable regulation(s) does not address manner and type of notification, DOE will provide the Department with advance written notice by letter or electronic mail but not solely by copies of documents.

- 4) **CONTAMINATION CONTROL-PTREAU/HEPA Vac Use Authorized**
If a portable/temporary radioactive air emission unit (PTRAEU) or HEPA filtered vacuum is used, controls as described in the sitewide NOC, (i.e., DOE/RL-96-75 or DOE/RL-97-50), and in the associated license would be followed. (WAC 246-247-040(5) and WAC 246-247-060(5))
- 5) **CONTAMINATION CONTROL-Follow RWP**
The cleaning operations shall be performed in accordance with the controls specified in a radiation work permit (RWP) and/or operating procedures. (WAC 246-247-040(5) and WAC 246-247-060(5))
- 6) **CONTAMINATION CONTROL-Routine Field Surveys Required**
All activities shall be conducted under the auspices of radiological control technicians. Routine field surveys, including swipes/smears, shall be conducted. Fixatives, covers, or other standard measures shall be used to contain contamination. (WAC 246-247-040(5) and WAC 246-247-060(5))
- 7) **CONTAMINATION CONTROL-Spill Prevention Required**

Appropriate spill prevention procedures shall be in place to minimize the probability of a release of radioactive liquid waste to the environment, and to provide immediate cleanup of any liquid spills. (WAC 246-247-040(5) and WAC 246-247-060(5))

8) WDOH NOTIFICATION-Limits on Contamination

Low risk radiological activities (i.e., less than or equal to 100,000 dpm/100 cm² beta-gamma and less than or equal to 2,000 dpm/100 cm² alpha) will be completed under this NOC implementing the following controls:

- Pre and post-job surveys will be performed and maintained as records of low emissions.
- A basin will be erected to contain radioactive contamination.
- Splashguards will be installed to contain spray water, and ensure waste water is directed toward and collected in the basin.
- All radioactive contamination removed during the decontamination process shall be contained, packaged, or disposed of within the same day.
- The basin surfaces shall be maintained to less than 1,000 dpm/100 cm² beta-gamma and 20 dpm/100cm² alpha when not in use.

For those activities considered medium risk radiological activities (i.e., greater than 100,000 dpm/100 cm² to less than or equal to 1,000,000 dpm/cm² beta-gamma and greater than 2,000 dpm/100 cm² to less than or equal to 20,000 dpm/cm² alpha), DOE will contact WDOH to discuss the additional controls that will be implemented for limiting radiological air emissions.

This NOC will not be used for high risk radiological activities. (WAC 246-247-040(5) and WAC 246-247-060(5))