

**LOW-ACTIVITY WASTE PRETREATMENT SYSTEM
ADDENDUM I
INSPECTION PLAN
CHANGE CONTROL LOG**

Change Control Logs ensure that changes to this unit are performed in a methodical, controlled, coordinated, and transparent manner. Each unit addendum will have its own change control log with a modification history table. The “**Modification Number**” represents Ecology’s method for tracking the different versions of the permit. This log will serve as an up to date record of modifications and version history of the unit.

Modification History Table

Modification Date	Modification Number
06/13/2024	PCN-LAWPS-2024-01 (8C.2024.Q2)
09/17/2021	8C.2021.8F
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**LOW-ACTIVITY WASTE PRETREATMENT SYSTEM
ADDENDUM I
INSPECTION PLAN**

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**ADDENDUM I
INSPECTION PLAN**

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1 I INSPECTION REQUIREMENTS

2 This Addendum describes the requirements and schedule for inspections of the Low-Activity Waste
3 Pretreatment System (LAWPS) Operating Unit Group (OUG), which includes Tank Side Cesium
4 Removal (TSCR) tank systems and components and the Spent Ion Exchange Columns (IXC) storage
5 areas (IXC staging area and IXC storage pad) in accordance with Washington Administrative Code
6 (WAC) 173-303-806(4)(a)(v), WAC 173-303-320, and WAC 173-303-340. This inspection plan is
7 designed to prevent malfunctions, deterioration, operator errors, and discharges that may cause or lead to
8 the release of dangerous waste that could pose a threat to human health and the environment. This
9 inspection plan is designed to provide early warning of the potential for such events in order to make
10 timely corrections and/or take preventative actions. The plan contains a written inspection schedule that is
11 maintained electronically in the LAWPS OUG Operating Record.

12 General Inspection Requirements

13 Inspections within the schedule are performed by qualified personnel according to a frequency that has
14 been developed through both regulatory requirements and operating experience. Inspection requirements
15 will continue until certification of completion of closure. For frequencies that are not defined by specific
16 regulatory requirements a justification for the frequency will be documented and maintained in the
17 LAWPS OUG Operating Record. During an inspection, inspectors evaluate each inspection item against
18 its associated acceptance criteria, defined in the schedule (Table I-1). The results of the inspections are
19 documented in inspection logs that are dated and signed (handwritten or electronic signature) by the
20 inspector.

21 This inspection plan addresses the following unit-group-specific items:

- 22 • Tank systems and secondary containment.
- 23 • Container storage.
- 24 • Monitoring instrumentation.
- 25 • Security equipment.
- 26 • Safety and communication equipment.
- 27 • Emergency equipment.
- 28 • Ignitable or reactive waste.

29 Management-level staff responsible for implementation of the Inspection Plan and for ensuring
30 corrective actions are taken are the Shift Operations Manager, Shift Manager, or Operations Manager as
31 described in Addendum G, "Personnel Training," and the facility Dangerous Waste Training Plan
32 (DWTP). Corrective action is discussed in Remedy Schedule section. Inspections are performed by either
33 facility operations personnel, or Hanford Fire Department personnel. All inspectors are trained in
34 accordance with Addendum G, "Personnel Training," DWTP; and/or Permit Attachment 5, *Hanford*
35 *Facility Training*.

36 A preventive maintenance recall system is employed to direct preventive maintenance activities at TSCR.
37 Equipment requiring maintenance is checked as indicated by the maintenance history, the manufacturer's
38 recommendations, or engineering recommendations.

39 Instrumentation at TSCR is calibrated regularly to ensure accuracy and reliability. All process control
40 instrumentation is calibrated on a schedule depending on previous calibration experience, manufacturers
41 recommendation, or engineering recommendations. An instrument calibration and recall system is
42 employed to manage calibrations.

1 **I.1 Frequency of Inspections**

2 The frequency of inspection is how often (at a minimum) an inspection must be performed. The
3 frequency of inspections is based on the rate of possible deterioration of equipment, operational history,
4 engineering judgement or the probability of a threat to human health or the environment.

5 Unless otherwise noted, inspection frequencies are defined by the following periodicities:

- 6 • Daily means once per calendar day.
- 7 • Weekly means once per calendar week, spanning from Sunday to Saturday.
- 8 • Monthly means once each calendar month.
- 9 • Quarterly means once per calendar quarter.
- 10 • Annually means at least once per 12-month period ± 30 days.
- 11 • Continuous monitoring means instrument monitoring is performed remotely in the Control Room
12 in 274AW (TSCR Control Enclosure remains available as backup) continuously during waste
13 processing operations, and at least daily when TSCR is not processing waste. If instrumentation is
14 not functioning, daily visual inspections are performed as identified in Table I-1. Continuous
15 monitoring will be recorded once daily.

16 The LAWPS inspections, instrument monitoring, and functional testing frequencies are indicated in
17 Table I-1.

18 **I.1.1 Inspection Log**

19 Notations of observations made and deficiencies noted during an inspection are recorded on an inspection
20 log (data sheets, round sheets, work packages, electronic inspection logs, logbooks, etc.). The inspection
21 log will also include an account of spills or discharges in accordance with WAC 173-303-145, and the
22 date and nature of any repairs or remedial actions taken. On completion, the inspection log includes the
23 inspector's printed name, handwritten or electronic signature, and date and time of the inspection. The
24 inspection log is submitted for review and approval by management or their designee. Once approved, the
25 inspection log is retained for at least five years in the LAWPS OUG Operating Record, or other approved
26 locations, in accordance with Permit Condition II.I.1.

27 If an inspection log cannot be located in the LAWPS OUG Operating Record, substitute
28 documentation/log will be added that documents the missing log. If an inspection was scheduled or
29 attempted; but could not be performed or fully completed due to a planned event (e.g., planned power
30 outage), then a reasonable attempt will be made to reschedule and complete the inspection within the
31 identified inspection frequency. If the cause was due to an unplanned event (e.g., weather, Hanford Site or
32 local area emergency or injury; unplanned power outage; unexpected or radiological conditions, work,
33 training, or safety restrictions); the missed inspection or portions thereof that were not completed shall be
34 documented on the relevant inspection log or facility logbook. And if applicable, reported in the Hanford
35 Facility Annual Noncompliance Report.

36 If while performing an inspection, a leak or spill to secondary containment is discovered, facility
37 operations responds per the emergency response procedures. Action is taken to stop the leak, determine
38 the cause, and the waste is removed from the secondary containment as soon as possible, preventing harm
39 to human health and the environment. The inspection records are used to help determine any necessary
40 corrective actions.

1 I.1.2 Remedy Schedule

2 Problems and unanticipated substandard conditions identified by the inspector are documented on the
3 inspection log and reported to facility management for prioritization, and scheduling of remedial actions
4 to minimize environmental or human health incidents. All remedial actions that require more than one
5 week to complete are given an Assigned Responsible Manager and tracked to completion using the
6 corrective action tracking system. The Assigned Responsible Manager is a staff member with functional
7 and management responsibility for the affected building system, area or equipment, such as a building
8 manager, operations manager or cognizant space manager. Problems identified during inspections are
9 categorized into three general areas and addressed accordingly. The areas include imminent hazards to
10 human health and/or the environment, problems that can be easily remedied with little or no planning, and
11 maintenance items that require planning and coordination to correct:

- 12 • When an identified problem poses an imminent risk to human health or the environment actions
13 are taken immediately to mitigate the hazard and may include activation of the Addendum J,
14 “Contingency Plan” and Permit Attachment 4, *Hanford Emergency Management Plan*
15 (DOE/RL-94-02), when contingency plan action levels are exceeded. Examples of problems that
16 warrant immediate action include active releases of dangerous waste to the environment
17 (e.g., container or tank system releases), failure of systems that mitigate potential releases
18 (e.g., secondary containment systems), lack of emergency response equipment, and a security
19 breach. If a leak or spill to secondary containment is discovered during an inspection, the
20 inspector will initiate immediate response actions to determine the source, minimize the spread of
21 the waste and stop the leak if possible. In container storage areas, waste will be removed from
22 secondary containment as soon as possible. For a leak from the tank system into secondary
23 containment, all released materials will be removed within 24-hours or in as timely a manner as
24 possible. Refer to Addendum C, “Process Information,” for additional description of the response
25 to spills or leaks. The incident and response actions will be described on the inspection log.
- 26 • Problems that compromise systems that are critical to detecting, preventing or responding to a
27 fire, spill, or release, such as inoperable fire suppression system, damaged secondary
28 containment, or malfunctioning leak detection equipment, will be corrected as quickly as
29 possible, but remedies may require a prioritized schedule to implement. In these situation,
30 compensatory measures will be implemented until corrective actions are completed.
31 Compensatory measures include actions such as suspension of waste management activities,
32 establishing a fire watch, moving containers out of the affected area, or providing portable
33 secondary containment. Once compensatory measures have been implemented, subsequent
34 remedial actions will be completed on a prioritized schedule (see below, “prioritized schedule”).
- 35 • Completion of corrective actions will be documented on the inspection log when completed
36 within one week. If follow up actions require more than one week to complete, they will be
37 tracked using the corrective action tracking system. Tracking number(s) for follow-up actions
38 will be noted on the inspection log.
- 39 • Problems identified during inspection that are easily corrected (e.g., no maintenance planning
40 required), such as label replacement, will be corrected within 24-hours of inspection or tracked
41 until completion.
- 42 • Other problems, which cannot be easily corrected, are addressed on a prioritized schedule. These
43 problems and the prioritized schedule are tracked using the Rounds Action Tracking List
44 (RATL); for problems identified during Hanford Fire Department inspections, the Job Control
45 System (JCS) is used.

- 1 • An overall schedule for remedying problems would include time to develop a maintenance
2 instruction in conjunction with any schedule constraints such as parts availability, fabrication,
3 environmental and facility access limitations. The time to develop a maintenance instruction is
4 dependent upon a number of factors including, nuclear, radiological, and industrial safety hazards
5 associated with the task, complexity of the task, human factors and performance considerations,
6 skill of worker(s), risk to the worker, public, or the environment.
- 7 • The inspection problem resolution process may include an inspection data sheet, which identifies
8 the criteria for the inspection; relaying identified problems onto an action-tracking list; and
9 development of maintenance instructions for problems based on the actions tracking list. The
10 remedies for problems identified are developed using maintenance instructions and prioritized on
11 a schedule as described. Problems pending resolution, and their associated tracking
12 number/designation, will be noted in subsequent inspection logs until the remedy is complete.
- 13 • Information from the inspection problem resolution process will be maintained in the LAWPS
14 OUG Operating Record.

15 **I.1.3 Specific Process Inspection Requirements**

16 The following sections describe the specific process inspections to be performed at the LAWPS OUG.

17 **I.1.4 Container Inspections**

18 Container inspections and frequencies are provided in Table I-1 and apply to spent IXCs located at either
19 the IXC staging area or the IXC storage pad.

20 **I.1.5 Tank System Inspections**

21 Tank system inspections and instrument monitoring criteria and frequencies are provided in Table I-1.
22 Tank system inspections occur at least once each operating day. Each operating day is defined as every
23 day the TSCR system is in operation (i.e. processing dangerous waste). Tank system inspections are
24 performed at least once each operating day to ensure the tank system is being operated according to its
25 design.

26 Integrity assessments for TSCR tank systems are discussed in Addendum C. The integrity assessment
27 program will continue over the life of the tank system at a frequency to be determined by an initial
28 integrity assessment. The schedule will be based initially on the materials of construction, characteristics
29 of the waste, and recommendation by an Independent Qualified Registered Professional Engineer.
30 Follow-on integrity assessments would also take into consideration the age of the tank system. A detailed
31 description of the TSCR tank system, including ancillary equipment, is provided in Addendum C,
32 “Process Information.”

33 The TSCR tank system process components are located within the Process Enclosure and is not accessible
34 during process operations because of As Low As Reasonable Achievable (ALARA) restrictions. The tank
35 system has secondary containment and leak detection; any leakage from the process components and
36 piping drains to the secondary containment sump and will alarm upon detection of liquid. The alarm
37 annunciates in the Control Room in 274AW. Liquid collected in the sump can be pumped out to effluent
38 receipt tank 241-AP-108. A second leak detector is located within a drain line from a National Electrical
39 Manufacturers Associated (NEMA) rated box that houses misroute prevention components. The NEMA
40 box is located in the airlock and provides secondary containment for the misroute prevention interface
41 between reagents and waste process components. Activation of this leak detector will alarm upon
42 detection of fluid and will automatically open a valve that drains any fluid to the drain header within the
43 Process Enclosure. The alarm annunciates in the Control Room in 274AW.

44 TSCR is a once-through closed system, therefore overflow protection is not applicable. Refer to see
45 Addendum C, “Process Information,” for additional detail regarding leak detection and process
46 component details.

1 Because of high radiation dose and entry restriction during process operations, daily visual inspections are
2 performed remotely via closed circuit television (CCTV).

3 **I.1.6 Security Equipment Inspections**

4 Security equipment inspection criteria and frequencies are provided in Table I-1. The inspections pertain
5 to posting warning signs, and doors as described in Addendum E, "Security."

6 **I.1.7 Safety and Communication Equipment**

7 Safety equipment visual inspection criteria and frequencies are provided in Table I-1, and pertain to the
8 fire extinguishers, spill response kits, eye wash station, and safety shower. Safety and communication
9 equipment functional testing criteria and frequencies are provided in Table I-1. The functional testing
10 pertains to the telephone, two-way portable radios, eyewash station, safety shower, and fire alarms/pull
11 boxes. The Hanford Fire Department performs the functional testing for the fire alarm/pull boxes, while
12 the facility remains responsible for having the testing conducted. The inspection criteria and frequency for
13 the spill response kits is provided in Table I-1. The safety and communication equipment locations are
14 specified in Addendum J, "Contingency Plan."

15 **I.1.8 Emergency Equipment Functional Testing**

16 Emergency equipment functional testing criteria and frequencies is provided in Table I-1. Emergency
17 equipment locations are specified in Addendum J, "Contingency Plan." The Hanford Fire Department
18 performs the functional testing on the fire suppression system, while the facility remains responsible for
19 having the testing conducted.

20 **I.1.9 Ignitable and Reactive Waste Inspection**

21 LAWPS OUG does not store or treat ignitable or reactive waste in tanks or containers; therefore, the
22 requirements of WAC 173-303-395(1)(d) are not applicable.

23 **I.2 Visual Inspection**

24 The visual inspection schedule for the LAWPS OUG is provided in Table I-1, for tanks and secondary
25 containment systems. Permit Condition II.O.3, allows alternate inspections when visual inspections
26 cannot be performed due to ALARA concerns with high radiation dose. The inspection schedule for
27 LAWPS monitoring instrumentation and for Spent IXC container storage is provided in Table I-1.

28 TSCR is designed for remote operation of equipment containing radioactive tank waste. The TSCR
29 process components are located within the Process Enclosure and are not accessible during waste
30 processing operations because of ALARA concerns with high radiation dose. Daily visual daily
31 inspection of the TSCR tank system components will be performed remotely by CCTV and is augmented
32 by use of instrumentation monitoring for process operations and leak detection.

Table I-1 Inspection Schedule

Description	Instrumentation	Frequency ¹	Type of Problem/Evaluation Criteria
Secondary Containment Areas			
Process Enclosure process area secondary containment, including sump and coating	N/A	Once during IXC change-out.	<p><u>Problem:</u> Cracks, gaps, or other degradation of secondary containment, including the sumps that threaten the integrity of secondary containment.</p> <p>Visually inspect the secondary containment, including sump for evidence of significant cracks, gaps, or other degradation that may compromise the integrity of the containment. Check that the structure is in good condition, and that no liquid is present.</p>
Air lock, NEMA 4X Cabinet secondary containment WP-ENCL-004	N/A	Once during IXC change-out.	<p><u>Problem:</u> Cracks, gaps, or other degradation of secondary containment, including the sumps that threaten the integrity of secondary containment.</p> <p>Visually inspect the secondary containment, for evidence of degradation that may compromise the integrity of the containment. Check that the item is in good condition and no liquid is present.</p>
Media Trap	N/A	Once during IXC change-out	<p><u>Problem:</u> Degradation of component or fittings.</p> <p>Visually inspect the media trap for evidence of degradation. Check that the component is in good condition.</p>
Container Storage			
Containers/container storage areas	N/A	Weekly	<p><u>Problem:</u> Damaged or degraded IXCs.</p> <p>Note: IXCs are fixed in place, ensuring 30-inch aisle spacing between rows.</p>
Container labels	N/A	Weekly	<p><u>Problem:</u> Labels not present, difficult to read, falling off.</p> <p>Verify labels are present and visible. Assess legibility of labels; note any impediments to visibility and off-normal condition of labels.</p>

Table I-1 Inspection Schedule

Description	Instrumentation	Frequency ¹	Type of Problem/Evaluation Criteria
Tank Systems			
Visual tank system inspection	N/A	Daily	<p><u>Problem:</u> Damage to tank/ancillary equipment or weld break threatening integrity of the tank system.</p> <p>Inspect viewable portions of the tank system for signs of corrosion or releases of waste; construction materials and the area immediately surrounding the externally accessible portion of the tank system, to detect erosion, or signs of releases of dangerous waste.</p> <p>Note: All areas within the Process Enclosure process area are viewed through cameras.</p> <p>If the camera system is inoperable, daily inspection of leak detection data will be performed.</p>
Tank labeling	N/A	Annual	<p><u>Problem:</u> Label/sign not present, falling off, or unreadable.</p> <p>Check for tank sign/major risk labels.</p>
Instruments			
POR655-WP-LDE-618 Process Enclosure Secondary Containment	Leak Detector	Continuously (when processing waste) Annual functional test	<p><u>Problem:</u> Process Area leak alarm received at Control Room in 274AW.</p> <p>Verify no leak or daily visually check during waste processing by camera inspection.</p>
POR655-WP-LD-610 Misroute Cabinet Secondary Containment	Leak Detector	Continuously (when processing waste) Annual functional test	<p><u>Problem:</u> Leak alarm received at Control Room in 274AW.</p> <p>Verify no leak or daily visually check during waste processing by camera inspection.</p>
AP106-WT-LDE-006A 241-AP-106 Riser 002 Drop-Leg	Leak Detector	Continuously (when processing waste) Annual functional test	<p><u>Problem:</u> Leak alarm received at the Control Room in 274AW.</p> <p>Verify no leak for hose-in-hose transfer line (HIHTL).</p>
AP107F-WT-LDE-007A 241-AP-107 Pump Pit	Leak Detector	Continuously (when processing waste) Annual functional test	<p><u>Problem:</u> Leak alarm received at the Control Room in 274AW.</p> <p>Verify no leak for HIHTL.</p>

Table I-1 Inspection Schedule

Description	Instrumentation	Frequency¹	Type of Problem/Evaluation Criteria
AP108-WT-LDE-008A 241-AP-108 Riser 015 Drop-Leg	Leak Detector	Continuously (when processing waste) Annual functional test	<u>Problem</u> : Leak alarm received at the Control Room in 274AW. Verify no leak for HIHTL.
POR655-WP-TT-300	Temperature Transmitter	Continuously (when processing waste) Annual calibration	<u>Problem</u> : Waste feed temperature out of acceptable range. Verify temperature is within acceptable range.
POR655-WP-TT-500	Temperature Transmitter	Continuously (when processing waste) Annual calibration	<u>Problem</u> : Treated Low-Activity Waste (LAW) temperature out of acceptable range. Verify temperature is within acceptable range.
POR655-WP-PIT-310	Pressure Indicator	Continuously (when processing waste) Annual calibration	<u>Problem</u> : Operating pressure out of acceptable range. Verify pressure is within acceptable range.
POR655-WP-PIT-313	Pressure Indicator	Continuously (when processing waste) Annual calibration	<u>Problem</u> : Operating pressure out of acceptable range. Verify pressure is within acceptable range.
POR655-WP-PIT-419A	Pressure Indicator	Continuously (when processing waste) Annual calibration	<u>Problem</u> : Operating pressure out of acceptable range. Verify pressure is within acceptable range.
POR655-WP-PIT-419B	Pressure Indicator	Continuously (when processing waste) Annual calibration	<u>Problem</u> : Operating pressure out of acceptable range. Verify pressure is within acceptable range.
POR655-WP-PIT-419C	Pressure Indicator	Continuously (when processing waste) Annual calibration	<u>Problem</u> : Operating pressure out of acceptable range. Verify pressure is within acceptable range.
POR655-WP-PIT-505	Pressure Indicator	Continuously (when processing waste) Annual calibration	<u>Problem</u> : Operating pressure out of acceptable range. Verify pressure is within acceptable range.
POR655-WP-PIT-558	Pressure Indicator	Continuously (when processing waste) Annual calibration	<u>Problem</u> : Operating pressure out of acceptable range. Verify pressure is within acceptable range.

Table I-1 Inspection Schedule

Description	Instrumentation	Frequency ¹	Type of Problem/Evaluation Criteria
POR655-WP-FIT-309	Flow Indicator	Continuously (when processing waste) Annual calibration	<u>Problem:</u> Flow out of acceptable range. Verify flow is within acceptable range.
Hose-In-Hose Transfer Lines			
HIHTL from 241-AP-107 to TSCR HIHTL-AP107-SN-103	Radiological detector and visual	Daily (during waste transfers)	<u>Problem:</u> Radiological or visual indication of a leak. Verify no indication of a leak along HIHTL.
HIHTL from TSCR to 241-AP-107 HIHTL-AP107-SN-102	Radiological detector and visual.	Daily (during waste transfers)	<u>Problem:</u> Radiological or visual indication of a leak. Verify no indication of a leak along HIHTL.
HIHTL from TSCR to 241-AP-106 HIHTL-AP106-SN-101	Radiological detector and visual	Daily (during waste transfers)	<u>Problem:</u> Radiological or visual indication of a leak. Verify no indication of a leak along HIHTL.
HIHTL from TSCR to 241-AP-108 HIHTL-AP108-SN-104	Radiological detector and visual	Daily (during waste transfers)	<u>Problem:</u> Radiological or visual indication of a leak. Verify no leak alarm for HIHTL.
HIHTL from TSCR to 241-AP-108 HIHTL-AP108-SN-105	Radiological detector and visual	Daily (during waste transfers)	<u>Problem:</u> Radiological or visual indication of a leak. Verify no indication of a leak along HIHTL.
Security Equipment			
Posted warning signs	N/A	Annual	<u>Problem:</u> Damaged, faded, or missing hazardous waste warning signs. Verify warning signs are posted in locations identified in Addendum E, "Security," and that signs are readable, and not damaged.
Doors/gates	N/A	Daily	<u>Problem:</u> Open when facility is unattended. Verify TSCR Process Enclosure exterior doors, and access gates are locked when not staffed. Verify the IXC storage area access gates are locked when not staffed. Lock doors/gates as appropriate.

Table I-1 Inspection Schedule

Description	Instrumentation	Frequency¹	Type of Problem/Evaluation Criteria
Fencing	N/A	Monthly	<u>Problem:</u> Damaged security fence. Verify fence is intact with no unexpected openings (see Addendum E, “Security”), and check for accumulated debris (e.g., tumbleweeds).
Underground piping signs for feed and return to Waste Treatment Plant (WTP). (Only those portions outside the 200 East Area perimeter fence.)	N/A	Annual	<u>Problem:</u> Missing or illegible signs. Verify underground transfer pipelines located outside the 200 East Area are marked with signs reading “Buried Dangerous Waste Pipe” in accordance with Permit Condition II.V.
Safety and Communication Equipment			
Spill response kits/supplies Available upon request, located at the 2715-AW Building	N/A	Monthly	<u>Problem:</u> Tamper seal is broken. Verify tamper seal is not broken. If the seal is broken, inventory the spill response kit contents, and affix new seal after inventory check/restocking.
2-way portable radios	N/A	Quarterly	<u>Problem:</u> Portable radios are not operational. Verify that portable radios are operational by performing radio check.
Eye wash stations	N/A	Monthly	<u>Problem:</u> Inadequate pressure, obstructions around and in front of eyewash station. Check for adequate pressure, and no obstructions.
Safety showers	N/A	Monthly	<u>Problem:</u> Inadequate pressure, obstructions around and in front of safety shower. Check for adequate pressure, and no obstructions.
Emergency Equipment			
Fire suppression system	N/A	Annual	<u>Problem:</u> Fire suppression system does not function as intended in a time of an emergency. Hanford Fire Department inspects and tests fire suppression system in accordance with National Fire Protection Association (NFPA) requirements.

Table I-1 Inspection Schedule

Description	Instrumentation	Frequency ¹	Type of Problem/Evaluation Criteria
Fire Alarm System	N/A	Annual	<p><u>Problem:</u> Room smoke detectors, manual pull stations, and alarm notification appliances (bells, horns, buzzers, lights, strobes, etc.) do not function as intended.</p> <p>Hanford Fire Department inspects and tests fire alarm systems (initiating and notification devices) in accordance with NFPA 72 requirements.</p>
Fire extinguishers	N/A	Monthly	<p><u>Problem:</u> Missing fire extinguisher, access to fire extinguisher is obstructed, inadequate pressure, extinguisher is damaged or corroded, fire extinguisher due for service.</p> <p>Ensure fire extinguishers are present, are accessible, at adequate pressure, not damaged or corroded, and the fire extinguisher is not due for service.</p>
Emergency Lights	N/A	Monthly	<p><u>Problem:</u> Emergency lights are inoperable.</p> <p>Verify operability.</p>

Note 1: Equipment locations are provided within the facility operating/inspection logs.

Note 2: Pipe-in-Pipe transfer lines are included in the LAWPS OUG permit application for design and installation only because there is no final status permit for the Double-Shell Tank OUG. It is anticipated for operations that these transfer lines will be transferred to a different final status OUG. Inspection of these lines will be performed by the OUG they are assigned to for operation in a future permit modification.

Note 3: Continuous frequencies for instruments will be recorded once daily when processing waste.

¹Unless otherwise noted, inspection frequencies are defined in Section I.1.

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