July 23, 2014

Mr. T.W. Fletcher, Assistant Manager
Office of River Protection, Tank Farm Projects
U.S. Department of Energy
Post Office Box 450
Richland, Washington 99352-0450

Dear Mr. Fletcher:

CONTRACT NUMBER DE-AC27-08RV14800 – WASHINGTON RIVER PROTECTION SOLUTIONS LLC PROPOSED CONTROL OF SLUDGE DEPTH IN 241-AN-101 AND 241-AN-106


During the U.S. Department of Energy, Office of River Protection (ORP) review and approval of the Deep Sludge Gas Release Event (DSGRE) safety basis amendment (Reference 1), there were discussions regarding a best management practice of monitoring gas retention and release in Double Shell Tanks prior to exceeding a sludge depth of 300 inches.

Washington River Protection Solutions LLC (WRPS) is implementing a best practice process control via the Tank Farms Waste Transfer Compatibility Program (Reference 2) to ensure no unexpected gas retention or release is occurring at significant sludge depths. The process control is outlined below.

<table>
<thead>
<tr>
<th>Issue</th>
<th>Tanks</th>
<th>Control</th>
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<tbody>
<tr>
<td>Deep Sludge Gas Release Event (DSGRE) data evaluation</td>
<td>241-AN-101 241-AN-106</td>
<td>1. Before exceeding 300 inches of sludge depth, evaluate waste behavior data for evidence of unexpected gas retention and/or release. The evaluation cannot start until at least 275 inches of solids are in the tank to be evaluated. Present the results of the evaluation to ORP before allowing sludge depth above 300 inches.</td>
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</table>
Based on the above process control, before WRPS issues a waste compatibility assessment authorizing a sludge depth greater than 300 inches, a data review will be performed to ensure gas retention and release behavior is consistent with the DSGRE test program’s documented results. The results of the data review will be provided to ORP prior to issuing the waste compatibility assessment. The waste compatibility program document changes necessary to implement this additional process control will be completed by August 15, 2014.

If you have any questions, please contact Mr. D. B. Little at 376-0907 or Mr. N. W. Kirch at 373-2380.

Sincerely,

(Signature Attached)

W. C. Clark
Project Operations Manager

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