

Categorical Exclusion for Periodic Operational Impacts from Corrosion Control, Flammability Control, and Sludge Carryover Minimization Programs.

Overview

Roundsheet changes to waste phase levels (supernate, salt, sludge), Corrosion Control program temperature limits, and flammability classification and surveillance numbers (rapid / slow / very slow) that support changes to waste phase properties identified by completion of SW11.6-SVP-ERD, "Tank Farm ERD Linking Surveillance Manual", and as required to support Waste Transfer Approvals are excluded from the USQ process.

Changing sludge levels, salt levels, dates these levels were measured, and pump/jet/downcomer elevations as a result of changes to waste phase properties and equipment requirements, identified by performance of SW11.1-WTE or as measured by an approved work package are excluded from the USQ process.

These changes support implementation of and compliance with the Corrosion Control (CC), Flammability Control (Flammability), and Sludge Carryover Minimization (SCOM) programs and can include the addition or removal of any surveillance that is required based on a new waste phase level, temperature limit change, or tank flammability classification change, except as described below for Tank 48 and Tank 50 temperature monitoring per SW9.6-RS(82H)E-2-1.

Minimum Qualifications to Apply

- USQ Screener qualified (in CST) as described in 11Q, 1.05.

Prerequisites

- DATR performed in accordance with S4-Eng.10 for procedure changes addressed by Categorical Exclusion.

Scope and Boundaries

The activities and procedures included in the scope of this Categorical Exclusion (CX) are described below.

Roundsheet changes included in the scope of this CX support performance of SW11.6-SVP-ERD, "Tank Farm ERD Linking Surveillance Manual" and Waste Transfer Approvals and are limited to the following:

- Waste phase level changes (supernate, sludge, salt);
- Dates the levels were measured;
- Waste phase temperature limit changes;
- Tank steel wall temperature limit changes;
- Designated thermocouple changes;
- Flammability classification (rapid / slow / very slow) changes;
- Changes in H₂ Sampling requirements (based on tank flammability status);
- Transfer pump or jet intake elevation changes;
- Downcomer elevation changes

The roundsheets in the scope of this CX are:

SW9.6-RS(1H)E-1-1	SW10.6-RS(1F)E-1-1
SW9.6-RS(2H)E-3-1	SW10.6-RS(18F)E-1-1
SW9.6-RS(2H)E-3-2	SW10.6-RS(18F)E-2-1
SW9.6-RS(2H)E-3-3	SW10.6-RS(18F)E-5-1
SW9.6-RS(2H)E-6-1	SW9.6-RS(2H)E-1-1
SW9.6-RS(28H)E-1-1	SW9.6-RS(28H)E-3-1
SW9.6-RS(28H)E-5-1	SW9.6-RS(1H)E-2-1
SW9.6-RS(82H)E-2-1	SW9.6-RS(28H)E-2-1

Changes to these roundsheet procedures also include:

- Changes to the electronic roundsheet version of the above hard copy procedures via performance of SW11.6-SVP-ERD.
- The addition or removal of TSR surveillance requirements from the roundsheet readings (electronic and hard copy versions) consistent with the procedure changes.

Tank 48 and Tank 50 temperature monitoring is not included in the scope of this Categorical Exclusion. Round sheet procedure SW9.6-RS(82H)E-2-1 contains specific readings used to ensure compliance with SAC 5.8.2.48f, Tank 48 Administrative Controls, and LCO 3.8.14, Tank 50 Waste Temperature Monitoring. These readings are performed to verify compliance with SAC 5.8.2.48f and SR 4.8.14.1 requirements and cannot be modified under the scope of this CX. In addition, given the unique nature of the Tanks 48 and 50 waste, per Engineering judgement, it is determined that all changes to temperature monitoring on these tanks shall be subject to the USQ process.

Changes to waste phase levels, date the levels were measured, and changes to pump/jet/downcomer elevations, as identified by the performance of procedures in the SW11.1-WTE manual or performance of an approved (per manual E7 and 11Q, procedure 1.05) work package and recorded in SW11.1-WTE-7.2, are included in the scope of this CX; however, the method used to determine the levels and elevations is not included (see below).

The CX does not apply to the review and approval of the methods used to determine waste phase levels and equipment elevations, such as sludge/salt sounding or other sludge measuring techniques. This CX shall not be used to approve work packages or procedures that perform these measurements. This CX shall only be applied to documenting the results in procedure SW11.1-WTE-7.2.

Procedure SW11.1-WTE-7.8 is not included in the scope of this CX. The elevation of mixing pumps is not directly related to the CC, Flammability, and SCOM programs and mixing pump elevations does not routinely change to support programmatic compliance. Therefore, mixing pump elevation changes per SW11.1-WTE-7.8 are subject to the USQ process.

In addition, this CX shall not be used to revise the required separation criteria listed in procedure SW11.1-WTE-7.2. The sludge/salt levels may be revised and the associated pump/jet/downcomer elevations may be revised but the required separation criteria shall not be revised under the scope of this CX.

Additionally, waste tank Acidic Chemical Cleaning (ACC) procedures and roundsheets cannot be revised under this Categorical Exclusion. The majority of operational impacts from ACC are stand alone and separate from the scope of this CX.

Basis and Intent

This Categorical Exclusion exempts procedure impacts resulting from CST operations and from implementation of the Corrosion Control (CC), CSTF Flammability Control, and Sludge Carryover Minimization (SCOM) programs from the USQ process. Given the nature of the processes of the Tank Farms, some properties of the stored waste are subject to change with time and movement. These programs monitor waste properties that have an effect on corrosion, vapor space LFL levels, and equipment status (elevations from the bottom of the waste tank). Subsequent changes to respective technical limits, data, and requirements (sludge level, salt level, pump/jet/downcomer

elevations, phase temperature, required thermocouples, and flammability classification) are allowed and in some cases required within the guidelines of each program. Operating procedures are updated as the technical limits, data, and requirements change. Because processing of these procedure changes are required to comply with the CC, Flammability, and SCOM programs, they directly implement approved, required Safety Basis Administrative Controls and will not result in a USQ.

References:

USQ-HTF-2015-00305, Categorical Exclusion # CX-CSTF-00001