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## 6.0 PROCEDURES TO PREVENT HAZARDS

This chapter discusses security, inspection schedules, preparedness and prevention requirements, preventive procedures, structures, and equipment, and prevention of reaction of ignitable, reactive, and incompatible waste for the 242-A Evaporator.

Where information regarding treatment, management, and disposal of the radioactive source, byproduct material, special nuclear material (as defined by the Atomic Energy Act of 1954, as amended) and/or the radionuclide component of mixed waste has been incorporated into this permit, it is not incorporated for the purpose of regulating the radiation hazards of such components under the authority of this permit or chapter 70.105 RCW.

### 6.1 SECURITY

Refer to Permit Attachment 33, §6.1 Security.

#### 6.1.1 Waiver

A waiver of security procedures and equipment requirements is not requested for the 242-A Evaporator. Therefore, the waiver requirements outlined in WAC 173-303-310(1)(a) and (b) are not applicable.

### 6.2 INSPECTION PLAN

This section describes the method and schedule for inspections of the 242-A Evaporator. The purpose of inspections is to identify situations that might cause or lead to a release of mixed waste that could pose a threat to human health and the environment. Abnormal conditions identified by an inspection must be corrected on a schedule that prevents hazards to the public and environment.

#### 6.2.1 General Inspection Requirements

This section provides an overview of inspections performed at the 242-A Evaporator. A copy of the inspection plan is kept in the 242-A Evaporator control room. There are three general classes of inspections at the 242-A Evaporator:

- Monitoring of remote instrumentations and alarms are performed by operating personnel in the 242-A Evaporator control room using the MCS computer.
- Visual inspections of tanks and equipment are performed by operating personnel. Other inspections of 242-A Evaporator equipment are performed as noted in Table 6.1 through Table 6.4.
- Preventive maintenance of equipment and calibration of instruments are performed by maintenance personnel. A computerized tracking system is used to identify and schedule preventive maintenance and calibration activities.

Preventive maintenance and instrument calibrations on certain equipment might not be possible when the 242-A Evaporator is operating. Because of the limited duration of 242-A Evaporator campaigns, these activities are scheduled during outages between campaigns to avoid interference with operating activities. Per Condition II.O.3 inspection of high radiation areas will be addressed on a case-by-case basis.

##### 6.2.1.1 Types of Problems

The 242-A Evaporator inspections include, but are not limited to, the following:

- Condition of tanks and ancillary equipment
- Condition of secondary containment
- Evidence of leaks or overflows from tanks, piping, or transfer lines

- 1 • Condition of security equipment
- 2 • Condition of safety, communications, and emergency equipment.
- 3 A schedule of inspections, including items to be inspected, problems to look for, frequency of inspections
- 4 and responsible organization are provided in Tables 6.1 through 6.4.

#### 5 **6.2.1.2 Frequency of Inspections**

6 The frequency of inspections is based on the significance of a failure of the equipment and on regulatory  
7 requirements, Hanford Site and industry standards, and experience of the nature and frequency of  
8 equipment failures.

- 9 • The frequency of inspections for the 242-A Evaporator is given in Tables 6.1 through 6.4. Examples  
10 of frequencies include:
  - 11 • Daily (at least every 24 hours) - visual inspections of tanks, piping and secondary containment.
  - 12 • Weekly (at least every 7 days) - visual inspections of personal protective equipment, exterior lighting,  
13 and posted warning signs.
  - 14 • Monthly (at least every 31 days) - inspections of emergency sirens, fire extinguishers, safety showers,  
15 emergency lighting and the spill control kit.
  - 16 • Annually (at least every 365 days) - instrumentation calibrations, cathodic protection system testing,  
17 fire inspections.

18 Leak detectors are functionally checked within 92 days of the start of a campaign and every 92 days  
19 thereafter until the campaign is over. The frequency of some alarm monitoring is continuous. This  
20 means an operator must be present in the control room to monitor alarm instruments that continuously  
21 check for conditions such as leaks and high sump levels. Continuous monitoring is only required when  
22 the 242-A Evaporator is processing waste

### 23 **6.2.2 Tank System Inspections and Corrective Actions**

24 This section discusses the inspections performed on the two tank systems at the 242-A Evaporator: the  
25 vapor liquid separator, C-A-1, and the condensate collection tank, C-100. Inspections include secondary  
26 containment and leak and overflow prevention equipment.

#### 27 **6.2.2.1 Overflow Prevention**

28 The vapor liquid separator, C-A-1, is equipped with instrumentation that alarms before the tank reaches a  
29 level where the tank could overflow or entrain liquid waste into the vacuum condenser system. The alarm  
30 annunciates in the control room allowing operating personnel to take immediate action to stop the vapor  
31 liquid separator from overflowing.

32 The condensate tank, C-100, was designed with an overflow line that routes waste to the feed tank,  
33 241-AW-102. This design prevents tank overflow to the condenser room.

#### 34 **6.2.2.2 Visual Inspections**

35 Visual inspections of tanks and secondary containments are performed to check for leaks, signs of  
36 corrosion or damage, and malfunctioning equipment. The following rooms containing dangerous waste  
37 are inspected:

- 38 • Condenser room
- 39 • Pump room
- 40 • Hot equipment storage room

41 In addition, the AMU and load out rooms are inspected when dangerous waste is present in the room.

1 The vapor liquid separator is located in the evaporator room, with a portion of the recirculation loop  
2 located in the pump room. Because of the high radiation dose in the evaporator room, visual inspections  
3 cannot be performed. Leaks in the evaporator room drain to the pump room sump; monitoring of the  
4 pump room sump instrumentation is performed to determine if leaks have occurred. Visual inspection of  
5 the pump room, hot equipment storage room, and load out room is performed through the shielding  
6 window on the AMU mezzanine to constrain personnel radiological exposure to levels that are as low as  
7 reasonably achievable (ALARA).

### 8 **6.2.2.3 Leak Detectors**

9 The sample enclosures in the load out and hot equipment storage room have leak detectors for both the  
10 feed and slurry samplers. For information on these systems and their secondary containment, refer to  
11 Chapter 4.0, §4.1.4.

12 During sampling or maintenance activities associated with the evaporator room, pump room, hot  
13 equipment storage room, or load out room, a radiological contamination control curtain may be extended  
14 over the load out room to reduce the likelihood of contaminants reaching the environment through the  
15 load out door. When extended, the contamination control curtain will limit visibility to the load out room  
16 from the shielding window on the AMU mezzanine while completing inspections. When this is the case,  
17 inspection forms will denote that the containment curtain was extended. Leaks in the evaporator room,  
18 pump room, hot equipment storage room, and load out room drain to the pump room sump. The sump  
19 high-level alarm serves as a leak detector for these rooms. For information on the rooms and their drain  
20 systems, refer to Chapter 4.0, §4.1.4.

21 There are conductivity probe leak detectors installed in the secondary containment of the feed transfer  
22 line, slurry line, and drain lines connecting the 242-A Evaporator to AW Tank Farm. However, these  
23 detectors are considered part of the DST System.

24 The PC-5000 transfer line may be continuously monitored during transfers by an electronic leak detection  
25 system (Chapter 4.0) or visually inspected at the encasement catch tank (TK-PC-101) in the LERF catch  
26 basin (242AL-43). The leak detection system alarms are monitored in the 242-A Evaporator Control  
27 Room on the Monitoring and Control System (§4.1.6.3.3). When necessary, visual inspections of the  
28 PC-5000 transfer line encasement are administratively controlled by the Shift Manager and occur at a  
29 minimum once every 24 hours during waste water transfers through the PC-5000 transfer line to ensure  
30 compliance with WAC 173-303-640(4)(c)(iii). Visual inspection for leaks from the PC-5000 transfer line  
31 are performed by 242-A Evaporator Operations, by looking for signs of any liquid not attributed to  
32 rain/precipitation at the encasement catch tank (TK-PC-101). If any liquid is observed the Shift Manager  
33 is notified to take corrective actions.

### 34 **6.2.2.4 Alternative Leak Detection during Electrical/Ventilation Outages**

35 As part of maintenance or system upgrades, the need to secure electrical power or ventilation to the 242-A  
36 Evaporator sometimes becomes necessary. This includes activities such as, but not limited to: cleaning  
37 and inspection of the motor control centers (MCCs) for distributing electrical power to the systems at the  
38 242-A Evaporator, ventilation system maintenance and upgrades. Planned electrical or ventilation outages  
39 are performed during periods when Double Shell Tank System waste is not being processed.

40 During times when access is limited as a result of electrical or ventilation outages, performance of daily  
41 inspections specified in Table 6.1 may be impacted. When impacted, an alternative method of leak  
42 detection is implemented for the condenser room, and the inspections are suspended in the pump room,  
43 loudout and hot equipment storage room, and the loading room.

44 When impacted in the condenser room, a camera will be placed above the floor drain to detect the  
45 presence of leaks or spills. The process condensate collection tank (TK-C-100), located in the condenser  
46 room, is the only tank storing dangerous waste on a routine basis. It is not normal to allow personnel  
47 access into the condenser room during extended electrical or ventilation outages unless maintenance  
48 activities or upgrades require entry. If required, the camera and subsequent television monitor will be

1 provided electrical power via an alternative source. Operators will complete their daily observations for  
2 leaks or spills using this method for the condenser room. Facility personnel will document the use of this  
3 alternative method in the Hanford Facility Operating Record, 242-A Evaporator unit specific portion.

4 For the pump room, loadout and hot equipment storage room, and the loading room, these rooms do not  
5 have the capability for a camera so that inspections are suspended during maintenance activities affecting  
6 the electrical power supply to the overhead lighting. Performance of Table 6.1 daily inspections is not  
7 possible. Storage of mixed waste does not occur in these rooms because systems which manage mixed  
8 waste within the pump room and the loadout and hot equipment storage room are flushed and gravity  
9 drained to the extent possible after each campaign. Should any remaining liquid leak from primary  
10 containment; it is captured by the secondary containment system and routed to the pump room sump and  
11 ultimately to the 241-AW-102 DST System tank. Quantities of liquid sufficient to reach 241-AW-102  
12 would cause a change in tank level. Facility personnel will document when inspections cannot be  
13 performed due to electrical outages in the Hanford Facility Operating Record, 242-A Evaporator unit  
14 specific portion.

15 The process described in the preceding paragraphs of this section may also be implemented when external  
16 events cause electrical or ventilation outages.

#### 17 **6.2.2.5 Cathodic Protection**

18 Cathodic protection is not required for the equipment within the 242-A facility boundaries. The only  
19 portion of the system, which is underground, is the PC-5000 transfer line. The PC-5000 line is  
20 constructed of fiberglass.

#### 21 **6.2.2.6 Tank Assessments**

22 The IAR was issued in 1998. The frequency and nature of these assessments are discussed in the IAR.

### 23 **6.2.3 Storage of Reactive and Ignitable Wastes**

24 A Fire Protection Engineer performs annual fire inspections of the 242-A Evaporator. The assessment  
25 includes the date and time of the inspection, the name of the professional inspector, a notation of the  
26 observations made, and any remedial actions which were taken as a result of the inspection. The  
27 completed fire protection facility assessment is included in the operating record.

### 28 **6.2.4 Air Emissions Control and Detection Inspections**

29 The process vent at the 242-A Evaporator is subject to 40 CFR 264, Subpart AA, which requires organic  
30 emissions be limited to 1.4 kilograms per hour, and 2.8 mega grams per year, or controls be installed to  
31 reduce organic emissions by 95 percent. Organic concentrations in the waste processed at the  
32 242-A Evaporator are limited to ensure the values of 1.4 kilograms per hour and 2.8 mega grams per year  
33 are not exceeded. Therefore, no emission control devices are installed on the 242-A Evaporator vessel  
34 ventilation system and no inspections are required (Chapter 4.0, §4.2).

### 35 **6.2.5 Inspection Logs**

36 Visual inspections (refer to Tables 6.1-6.4) are performed using inspection log sheets (also called round  
37 sheets) that outline frequency, the components to inspect, operating conditions and ranges, and types of  
38 problems. Log sheets are kept in the 242-A Evaporator control room. Inspectors record the following  
39 information:

- 40 • Date and time of the visual inspection
- 41 • Printed name and signature of the person performing the inspection
- 42 • Notations of the observations made, including space for writing comments
- 43 • An account of spills or discharges in accordance with WAC 173-303-145.

1 Completed log sheets are reviewed and approved by the shift supervisor, collected, and stored for at least  
2 5 years.

3 Maintenance inspections are performed as part of the maintenance job control system. After completion,  
4 the maintenance documentation is reviewed and signed.

### 5 **6.2.6 Schedule for Remedial Action for Problems Revealed**

6 If while performing a visual inspection (Table 6.1), a leak or spill is discovered, facility management  
7 responds immediately per Chapter 7.0, Contingency Plan. Action is taken to stop the leak and determine  
8 the cause. The waste is removed from the secondary containment within 24 hours or in a timely manner  
9 that prevents harm to human health and the environment. For spills that drain to the pump room sump,  
10 the sump must be jetted. The sump will be triple rinsed in accordance with WAC 173-303-160(2)(b) if  
11 the contents include acutely hazardous waste (WAC-173-303-040) or toxic extremely hazardous waste  
12 (WAC-173-303-100). Pesticides are not expected to enter this system (Chapter 4.0, §4.1.5).

13 If an alarm activates during inspections, an operator responds immediately and implements appropriate  
14 actions.

15 If an inspection identifies equipment that is missing, damaged, or not operating properly, the operator  
16 records the problem on a deficiency log in the 242-A Evaporator control room. Repair work is prioritized  
17 by facility management to mitigate health and environmental risks.

## 18 **6.3 PREPAREDNESS AND PREVENTION REQUIREMENTS**

19 The following sections document the preparedness and prevention measures taken at the  
20 242-A Evaporator.

### 21 **6.3.1 Equipment Requirements**

22 The following sections describe the internal and external communications and emergency equipment  
23 located at the 242-A Evaporator that can be activated by the 242-A Evaporator BED. Hanford Facility-  
24 wide equipment is identified in Permit Attachment 4, *Hanford Emergency Management Plan*  
25 (DOE/RL-94-02).

### 26 **6.3.2 Internal Communications**

27 The 242-A Evaporator is equipped with internal communication systems to provide immediate emergency  
28 instruction to facility personnel. The onsite communication systems at the 242-A Evaporator include  
29 telephones, hand-held two-way radios, a public address system, and alarm systems. The telephone and  
30 radio systems provide for internal and external communication. Alarm systems allow facility personnel  
31 to appropriately respond to various emergencies, including building evacuations, take cover events, fires  
32 and/or explosions. The locations of telephones, public address systems, and alarms are given in the  
33 Chapter 7.0, Contingency Plan.

34 Immediate emergency instruction to personnel is provided by a public address system using speaker horns  
35 and speakers located throughout the 242-A and 242-AB Buildings and outside.

#### 36 **6.3.2.1 External Communications**

37 The 242-A Evaporator is equipped with devices for summoning emergency assistance from the Hanford  
38 Fire Department, the Hazardous Materials Response Team, and/or Hanford Patrol, as necessary. External  
39 communication to summon emergency assistance is made by using a telephone communication system,  
40 fire alarm pull boxes, or hand-held radio as described in Permit Attachment 4, *Hanford Emergency*  
41 *Management Plan*, (DOE/RL-94-02). These devices are provided throughout the 242-A Evaporator.

1 During certain periods, only one operator may be available within the 200 East plateau. This operator has  
2 access to external communication using telephones located throughout the building.

### 3 **6.3.2.2 Emergency Equipment**

4 Emergency equipment is available throughout the 242-A Building. The locations of telephones, public  
5 address systems, and alarms are given in Chapter 7.0, Contingency Plan.

6 Major fire damage is unlikely at the 242-A Evaporator because of the concrete construction and because  
7 the amount of combustible material is minimized. Temperature activated water sprinkler systems,  
8 emergency lights, fire alarms pull boxes, and fire extinguishers are located throughout the facility. The  
9 242-A Evaporator relies primarily on the Hanford Fire Department to respond to fires and other  
10 emergencies as described in Permit Attachment 4, *Hanford Emergency Management Plan*,  
11 (DOE/RL-94-02). The Hanford Fire Department is capable of providing rapid response to fires within the  
12 200 East Area.

13 Safety showers are located in the areas where personnel are most likely to have direct exposure of  
14 hazardous materials: in the AMU room and on the first and fourth floors of the condenser room. Water  
15 for these devices is supplied from the sanitary water system.

16 Respirators are located in the PPE storage room near the entryway to the condenser room. Other PPE,  
17 such as hazardous material protective gear and special work procedure clothing, are located in cabinets in  
18 the survey area. If required, PPE is donned before entry into the rooms containing mixed waste. The  
19 level of personal protective equipment required depends on the level of contamination in the area being  
20 entered and the activity being performed.

21 A spill control kit is located in a cabinet near the door to the PPE storage room. An inventory of the  
22 equipment in the spill kit is included inside the cabinet. The spill kit cabinet door seal is checked monthly  
23 to ensure the kit has not been used. The kit inventory is inspected annually.

24 The 242-A Evaporator operating personnel are trained in the use of emergency equipment (Chapter 8.0).

### 25 **6.3.2.3 Water for Fire Control**

26 Water for fire protection is supplied from the 200 East Area raw water system. Columbia River water is  
27 supplied to the fire control system from the 282-E Water Supply Reservoir. The water distribution  
28 system is sized to provide adequate volume and pressure to supply fire fighting needs under normal and  
29 emergency conditions. A fire hydrant is located in the immediate proximity of the 242-A Building.

30 In the event that the sprinkler system at the 242-A Evaporator does not put out a fire, or the sprinkler  
31 system is damaged during an accident, the Hanford Fire Department fire station will provide equipment as  
32 described in Permit Attachment 4, *Hanford Emergency Management Plan (DOE/RL-94-02)*.

### 33 **6.3.3 Spacing Requirement**

34 Sufficient space is maintained on the exterior of the 242-A Evaporator to allow access of personnel and  
35 equipment responding to fires, spills, or other emergencies. Unobstructed fire lanes run from Fourth  
36 Street and Canton Avenue to the 242-A Building main entrance to allow emergency vehicle access to the  
37 main entrance and the nearby fire hydrant.

38 The 242-A Building interior space is designed to allow access by emergency response personnel while  
39 maintaining barriers to contain releases of gaseous or liquid waste and hazardous material. Exit (egress)  
40 paths in the rooms containing dangerous waste are checked daily to ensure the walkways have not been  
41 obstructed.

## 42 **6.4 PREVENTIVE PROCEDURES, STRUCTURES, AND EQUIPMENT**

43 The following sections describe preventive procedures, structures, and equipment.

#### 1 **6.4.1 Loading and Unloading Operations**

2 The feed transfer and slurry lines between the 242-A Evaporator and AW Tank Farm are constructed of  
3 carbon steel piping with secondary containment and leak detection in a pipe-within-a-pipe arrangement.  
4 Although the regulations exempt systems that serve as secondary containment from requiring secondary  
5 containment, two of the drain lines from the 242-A Evaporator to AW Tank Farm also have outer  
6 encasement piping and leak detection (refer to Chapter 4.0, §4.1.4, for information on these lines).

7 Waste transfers within the 242-A Building are contained by the secondary containment walls, floors and  
8 drains (refer to Chapter 4.0, §4.1.4, for information on secondary containment at the 242-A Evaporator).

9 Mixed waste storage containers are not loaded or unloaded at the 242-A Evaporator. Unloading  
10 operations occur when equipment contaminated with mixed waste exits the facility. Such materials are  
11 fully sealed in plastic with absorbent material to absorb any free liquid present. Because of these  
12 requirements, the likelihood of a spill outside the 242-A Building during this operation is extremely low.

#### 13 **6.4.2 Runoff**

14 Liquid waste handling at the 242-A Evaporator occurs within tank systems with secondary containment.  
15 Rooms containing mixed waste have drains that route to either the pump room sump or the feed tank,  
16 241-AW-102. The pump room sump overflows to the feed tank as well. Therefore, run-off from a major  
17 leak, such as a break in a large water line within the 242-A Building, would be contained within the  
18 facility or drained to the feed tank (refer to Chapter 4.0, §4.1.4 for information on secondary containment  
19 and drain systems).

#### 20 **6.4.3 Water Supplies**

21 Raw and sanitary Columbia River water are supplied to the 242-A Evaporator via separate underground  
22 lines from the 282-E Water Supply Reservoir. Raw water is filtered to prevent organisms and other  
23 debris from clogging valves, fire hydrants, and other equipment. Sanitary water is filtered and treated  
24 before distribution through a piping system separate from the raw water system.

25 The raw water supply to the 242-A Evaporator enters the 242-A-81 Water Service Building, passing  
26 through a strainer and backflow preventer before entering the facility. The backflow preventer ensures  
27 contaminated water cannot flow back into the raw water system. A second backflow preventer is  
28 installed in the 242-A Building on the raw water supply line connecting with the condensate recycle line.  
29 This system allows either raw water or process condensate to be used for the pump seal water and  
30 deentrainment pad spray water without risk of contamination of the raw water system.

31 The sanitary water system provides water to the lunchroom, drinking fountains, men's and women's  
32 change rooms, safety showers, and supply ventilation system air washers. There are no connections  
33 between sanitary water and any system or piping containing mixed waste.

#### 34 **6.4.4 Equipment and Power Failures**

35 Backup power is provided by a diesel generator. The diesel motor starts automatically on loss of  
36 electrical power and has sufficient fuel to operate the generator, if needed, to safely shut down the  
37 evaporator process. An uninterruptible power supply system also is provided to allow continued  
38 operation of the MCS computer to ensure uninterrupted monitoring until the backup generator is fully on  
39 line.

40 The 242-A Evaporator is designed to mitigate the effects of failure of a major piece of equipment. In  
41 general, the evaporator process can be shut down and the vapor liquid separator gravity drained to the  
42 feed tank, 241-AW-102, in the event of equipment failure. The process condensate tank, TK-C-100, is

- 1 designed to overflow to feed tank 241-AW-102. This mitigates failure of the process condensate pump  
2 used to transfer the process condensate to LERF.
- 3 Response to equipment and power failures are discussed in more detail in Chapter 7.0, Contingency Plan.

#### 4 **6.4.5 Personnel Exposure**

5 Facility design, administrative controls, and personal protective equipment are used at the  
6 242-A Evaporator to prevent undue exposure of personnel to mixed waste and other hazardous materials.

7 The following features were incorporated into the 242-A Evaporator design to minimize personnel  
8 exposure.

- 9 • The facility is designed for remote operation of equipment containing highly radioactive solutions  
10 such as waste feed and slurry. These solutions usually are present only in the pump room and  
11 evaporator room, which are heavily shielded and routinely are not entered by operating personnel.
- 12 • The 242-A Building ventilation system is designed to provide air flow from uncontaminated zones to  
13 progressively more contaminated zones.
- 14 • Emergency lighting devices are located strategically throughout the 242-A Building.
- 15 • Eyewash stations and safety showers are located in rooms containing mixed waste or other hazardous  
16 materials that personnel routinely enter. For location of these, refer to Chapter 7.0, Contingency Plan.
- 17 • Continuous air monitors with audio and/or visual alarms to notify personnel of airborne radioactive  
18 contamination are provided in rooms that contain mixed waste and that routinely are entered.
- 19 • Methods for decontaminating vessels and equipment are available to reduce personnel exposure if  
20 entry for maintenance activity is required.
- 21 • Offices, control room, change rooms, and lunchroom are situated to minimize casual exposure of  
22 personnel.

23 All operations are conducted so employee exposure to mixed waste and other hazardous materials are  
24 maintained ALARA. Exposures are minimized by engineering or administrative controls with protective  
25 gear used where such controls are not practical. Before the start of any operation that might expose  
26 personnel to the risk of injury or contamination, a review of the operation is performed to ensure the  
27 nature of hazards that might be encountered are considered and that appropriate protective gear is  
28 selected. Administrative procedures dictate the level of protective clothing worn and depend on the  
29 location within the 242-A Building and the nature of the activity being performed. Personnel are trained  
30 to wear personal protective equipment in accordance with approved work procedures.

### 31 **6.5 PREVENTION OF REACTION OF IGNITABLE, REACTIVE, AND INCOMPATIBLE** 32 **WASTE**

33 The following sections describe prevention of reaction of ignitable, reactive, and incompatible waste.

#### 34 **6.5.1 Precautions to Prevent Ignition or Reaction of Ignitable or Reactive Waste**

35 Administrative procedures are designed to prevent the ignition or reaction of waste at the  
36 242-A Evaporator. The precautions include the following.

- 37 • Analysis is performed on candidate waste in the DST System to check that there are no exothermic  
38 reactions when the waste is heated and that there will be no adverse affects due to mixing the contents  
39 of different waste tanks in the feed tank and evaporator vessel (refer to Chapter 3.0, for details on  
40 waste analysis).

- 1 • Sample analysis of the candidate waste in the DST System includes a surface sample to identify the  
2 presence of a separable organic phase that might be ignitable. If a separate organic phase is detected,  
3 the waste solution level in the feed tank is maintained above 2.54 meters to prevent transfer of the  
4 organic phase to the 242-A Evaporator.
- 5 • The condensate tank, C-100, is equipped with instrumentation to detect the presence of a separable  
6 organic phase. If a separate organic phase is detected, the tank is allowed to overflow, transferring  
7 the organic phase to the feed tank, 241-AW-102.
- 8 • The condensate tank, C-100 is overflowed to the DST System during each campaign to prevent the  
9 possibility of accumulating immiscible organics in the condensate waste tank.
- 10 • The vapor liquid separator and the condensate tank are drained and flushed before any welding is  
11 performed.
- 12 • Administrative safety controls have been established to control the use and quantities of combustibles  
13 materials, fuels, and gases. Hot work activities such as cutting, welding, and brazing are  
14 administratively controlled as part of the industrial safety program.

#### 15 **6.5.2 Precautions for Handling Ignitable or Reactive Waste and Mixing of Incompatible** 16 **Waste**

17 Waste received at the 242-A Evaporator is protected from materials or conditions that might cause the  
18 waste to ignite or react. Much of the waste handling is done remotely to reduce the risk to operating  
19 personnel. For precautions taken to prevent the ignition or reaction of waste, refer to Section 6.5.1.

20 The constituents in the waste received at the 242-A Evaporator that are ignitable or reactive are not very  
21 volatile. Therefore, the evaporation process renders the waste that is evaporated (i.e., the process  
22 condensate) neither ignitable nor reactive.

1

**Table 6.1. Visual Inspection Schedule for Tanks, Piping, and Rooms**

Item	Inspection	Frequency <sup>1</sup>
<b>Tank and Piping Inspection</b>		
Condensate tank and piping	<ul style="list-style-type: none"> <li>Inspect piping for leaks or corrosion</li> </ul>	Daily
<b>Room Inspections</b>		
AMU room	<ul style="list-style-type: none"> <li>Inspect piping for leaks or corrosion</li> <li>Inspect floor for spills or damage</li> <li>Inspect for equipment malfunctions</li> <li>Inspect for housekeeping</li> </ul>	Daily <sup>2</sup>
Pump room	<ul style="list-style-type: none"> <li>Inspect piping for leaks or corrosion</li> <li>Inspect floor for spills or damage</li> <li>Inspect for equipment malfunctions</li> <li>Inspect for housekeeping</li> <li>Monitor pump room sump for overflow</li> </ul>	Daily <sup>3</sup>
Hot equipment storage room	<ul style="list-style-type: none"> <li>Inspect piping for leaks or corrosion</li> <li>Monitor pump room sump and inspect floor for spills or damage</li> <li>Inspect for housekeeping</li> </ul>	Daily <sup>3</sup>
Load out / Loading room	<ul style="list-style-type: none"> <li>Inspect for housekeeping</li> <li>Monitor drains</li> </ul>	Daily <sup>2,3,4</sup>
Condenser room	<ul style="list-style-type: none"> <li>Inspect tanks and piping for leaks or corrosion</li> <li>Inspect floors for spills or damage</li> <li>Inspect for equipment malfunctions</li> <li>Inspect for housekeeping</li> </ul>	Daily
IX column <sup>5</sup> room	<ul style="list-style-type: none"> <li>Inspect piping for leaks or corrosion</li> <li>Inspect floor for spills or damage</li> </ul>	Daily <sup>6</sup>

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<sup>1</sup> Continuously: an operator must be present in the control room to respond to alarms when processing waste  
Daily: at least every 24 hours

<sup>2</sup> When dangerous waste is present

<sup>3</sup> Use viewing window in AMU room to perform inspection

<sup>4</sup> Denote use of contamination control curtain when extended

<sup>5</sup> IX column was removed in 2003. The remaining piping has been drained and isolated.

<sup>6</sup> Surveillance is only required if the piping is returned to service and dangerous waste is reintroduced to the piping

1 **Table 6.2. Inspection Schedule of Safety, Security, and Emergency Equipment**

Item	Inspection	Frequency <sup>1</sup>
<b>Security</b>		
Building external doors	Verify external doors are closed and locked <sup>2</sup>	Daily
Posted warning signs	Verify signs are present, legible, and visible at 7.6 meters	Weekly
<b>Communications</b>		
Radios	Verify radios are operable and batteries are charged	Monthly
Telephones	Verify telephones are operable	Quarterly
Intercom/public address system	Verify systems are working properly	Quarterly
<b>Emergency Equipment</b>		
Safety showers/ eyewash station	Verify operability	Monthly
Emergency lighting	Verify operability	Monthly
Fire extinguishers	Verify fire extinguishers are in their proper location	Monthly
Spill response kit	Verify spill kit is present	Monthly
Personal protective clothing	Verify availability	Weekly
Respirators	Verify availability and shelf life	Monthly

2

<sup>1</sup> Continuously: an operator must be present in the control room to respond to alarms  
 Daily: at least every 24 hours  
 Weekly: at least every 7 days  
 Monthly: at least every 31 days  
 Quarterly: at least every 124 days  
 Annually: at least every 365 days

<sup>2</sup> Entrances to office areas are allowed to be unlocked

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**Table 6.3. Inspection Schedule for Alarm Monitoring**

Item	Inspection	Frequency <sup>1</sup>
<b>Overfill Protection</b>		
Vapor liquid separator: WFSH-CA11 WFSH-CA12	Monitor for vapor liquid separator high level. Surveillance required only when solution is in the vapor liquid separator.	Continuously
<b>Leak Detection</b>		
Sampler lines: LDS-SMPL1 LDS-SMPL2	Monitor feed and slurry sampler lines for leaks. Surveillance required only during feed or slurry sampling.	Continuously
Pump room sump: WFI-SUMP1	Monitor for leaks in the evaporator room, pump room, load out and hot equipment storage room and loading room. These rooms drain to the pump room sump. Surveillance required only when waste solution is present in the rooms listed.	Continuously

<sup>1</sup> Continuously: an operator must be present in the control room to respond to alarms.

**Table 6.4. Inspection Schedule for Maintenance and Other Inspections**

Item	Inspection	Frequency <sup>1</sup>
<b>Instrumentation Functional Checks and Calibrations</b>		
Leak detectors	Perform leak detector functional checks.	Within 92 days of campaign startup and every 92 days thereafter until the campaign is over
Vapor liquid separator high level alarms: WFSH-CA11 WFSH-CA12	Perform calibrations of loop instruments.	Annually
Pump room sump level: WFI-SUMP1	Perform calibrations of loop instruments.	Annually
<b>Backup Electrical Equipment</b>		
Diesel generator	Verify operability.	Monthly
Uninterruptible power supply	Verify output voltage and inspect battery for signs of damage or tampering.	Annually
<b>Fire Systems</b>		
Fire suppressant and notification systems (i.e., sprinkler system and fire alarm pull boxes)	Water flow alarm tests of the sprinkler system to ensure the operation of a single sprinkler head will transmit an alarm, and that any of the manual fire alarm boxes will properly transmit an alarm signal.	Annually
Visual inspection of the physical condition of the sprinkler system, testing, and calibration of smoke detectors, and testing of heat detectors	A visual inspection of the sprinkler system to ensure system integrity as well as the required testing and calibration of detectors to ensure functionality. A flow test at the sprinkler system is performed to ensure proper flow to the system riser.	Biennial
Fire inspection	Inspect areas where ignitable or reactive wastes are stored per WAC 173-303-395(d).	Annually

<sup>1</sup> Continuously: an operator must be present in the control room to respond to alarms.

Monthly: at least every 31 days  
 Annually: at least every 365 days  
 Biennial: every 730 days