



02-OSR-0573

U.S. Department of Energy
Office of River Protection
Mr. R. J. Schepens
Manager
P.O. Box 450, MSIN H6-60
Richland, Washington 99352

CCN: 043662

OCT 15 2002

Dear Mr. Schepens:

**CONTRACT NO. DE-AC27-01RV14136 – DECISION TO DEVIATE FROM THE
AUTHORIZATION BASIS FOR THE HANFORD TANK WASTE TREATMENT AND
IMMOBILIZATION PLANT**

The purpose of this letter is to provide notification to the U.S. Department of Energy (DOE), Office of Safety Regulation (OSR) of a decision to deviate (DTD) from the authorization basis for the Hanford Tank Waste Treatment and Immobilization Plant. This DTD is being processed in accordance with the Integrated Safety Management Plan Section 3.3.3.3 and project procedures. This letter provides the written notification for this DTD.

The attached DTD describes several deviations from the High Level Waste (HLW) Preliminary Safety Analysis Report (PSAR) due to ongoing design evolution/changes. The reconciliation of these deviations will be a modification to the HLW PSAR to incorporate the changes, deletions, and additions described in the attached DTD.

Authorization Basis Change Notice 24590-WTP-ABCN-ESH-02-039 will be submitted to DOE for approval within 30 days of the approval of this DTD.

This DTD was approved on October 10, 2002. Verbal notification of Bechtel National, Inc.'s intent to deviate from the AB was provided to the OSR on October 10, 2002 when the condition was discussed with Mr. Rob Barr.

Please contact Mr. Mark Platt at (509) 371-4891 or Mr. Bill Spezialetti at (509) 371-4654 for any questions or comments on this transmittal.

Very truly yours,

R. F. Naventi
Project Manager

Decision to Deviate 24590-HLW-DTD-M-02-003 R/0
Attachment 1

1) Conformance with applicable laws and regulations, top level standards and principles, and SRD safety criteria is maintained.

- a) Deviation 1, 2, 4, and 5 are not related to rules for nuclear activities (10CFR820), nuclear safety management (10CFR830), or occupational radiation protection (10CFR835). Therefore, compliance with applicable laws and regulations is maintained.
- b) Deviation 3 is a reduction in volume of a vessel containing radioactive condensate in a remote operated/maintained cell, and no changes were made to any ALARA safety features/components. Therefore, compliance with applicable laws and regulations is maintained.
- c) This deviation is limited to the items listed on page 1 of the DTD, and is beyond the level of detail provided in the top level safety principles for design (RL/REG-96-00006, Section 4.2.1). These changes continue to conform with top level design principles. Therefore, conformance to top level safety principles is maintained.
- d) These changes satisfy all SRD criteria.

2) The specific design changes do not cause or threaten imminent danger to the workers, the public, or the environment from radiological, nuclear, or chemical hazards.

- a) These changes do not impact the ALARA features of any radiological/nuclear processes or equipment, or the safety features of any processes or equipment containing chemical hazards. Therefore, this deviation does not threaten imminent danger to the worker, public, or the environment.