

02-OSR-007



U.S. Department of Energy
Office of River Protection
Contract Management Division
Mr. Michael K. Barrett
Contracting Officer
P.O. Box 450, MSIN H6-60
Richland, Washington 99352

CCN: 028618

FEB 21 2002

Dear Mr. Barrett:

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 U.S. Department of Energy, 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 (ISMP) Section 3.3.3.3 and project procedures. This letter satisfies the 72 hour written notification requirement.

The attached DTD describes a deviation to the Limited Construction Authorization Request (LCAR) relative to the moisture content of the soil being compacted for the process facility foundations. The LCAR specifies that moisture content will be controlled within $\pm 2\%$ optimum as determined by ASTM 1557. This DTD allows the moisture content to be controlled within $\pm 5\%$ optimum as determined by ASTM 1557.

Authorization Basis Change Notice (ABCN) 24590-WTP-ABCN-ESH-02-006 has been initiated to change the LCAR moisture content requirement consistent with this DTD and effectively correct the deviation. This ABCN will be submitted for OSR approval by March 14, 2002. Approval of this ABCN by May 15, 2002 will be requested to meet ISMP and procedural requirements to correct the deviation within 90 days.

Corrective Action Report 24590-WTP-CAR-QA-02-040 has been generated to document and track the deviation as a deficiency using appropriate quality procedures and documents.

This deviation has been discussed with Mr. Al Hawkins of OSR.

RECEIVED

FEB 21 2002

DOE-ORP/ORPCC



Decision to Deviate from the Authorization Basis

ISSUED BY
3DP-WTP PDG
CC 2/14/02
INIT DATE

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DTD No: 24590-WTP-DTD-C-02-001

Rev No: 0

The approvers of this form have determined that it is critical to project progress to temporarily deviate from the Authorization Basis (AB) as allowed in RL/REG-97-13. This temporary situation will be corrected no later than 30 days (or 90 days for changes requiring DOE approval) from the date this form is approved by the Area Project Manager. Following approval of the DTD, and if DOE approval of the request to amend the AB is required, notify DOE in writing including a copy of this form within 72 hours.

- Awaiting modification of the AB as described in ABCN No.: 24590-WTP-ABCN-ESH-02-006
- Awaiting completion of ES&H review on Document Review Request.

Identify the specific design changes that are not in compliance with the AB (include the document numbers of affected design documents).

Design changes which will be made on Section 3.3.8, 3.4.9 & 3.5.1 of Technical Specification for Excavation and Backfill are not in compliance with the AB.

The referenced section of the current Specification specifies $\pm 2\%$ of optimum as determined by ASTM D1557 for moisture condition of the compacted material. Replace $\pm 2\%$ with $\pm 5\%$.

Affected Documents / Drawings		
Number	Rev.	Title
24590-BOF-3PS-CE01-T0001	1	Technical Specification for Excavation and Backfill

Describe the specific deviation from the AB associated with implementing the change. Identify the AB document(s) and the affected section(s).

Limited Construction Authorization Request, 24590-WTP-LCAR-ESH-01-001, Rev. 1a
Section 1.3.1.2.4, Structural Fill and Compaction

1) Current section reads: "Moisture content of compacted material will be controlled to be within $\pm 2\%$ of optimum as determined by ASTM D1557". Replace $\pm 2\%$ with $\pm 5\%$.

Section 1.3.1.2.5, Soil Compaction Testing (2nd Paragraph)

2) This section cites ASTM D3017 for moisture content testing and states "...These tests are to be used by the Geotechnical Engineer to confirm that structural fill material has been compacted in accordance with design requirements in the Geotechnical Investigation Report" (emphasis added). The Geotechnical report states "Moisture content should be controlled within $\pm 2\%$ of optimum." Moisture content will be controlled within $\pm 5\%$ not $\pm 2\%$ as stated in the Geotechnical Report.

LCAR commitments impacted by this DTD are 1) control moisture content within $\pm 2\%$ of optimum and 2) perform tests to confirm material has been compacted in accordance with design requirements in the Geotechnical Investigation Report (relative to $\pm 2\%$ optimum moisture content).

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2/14/02 2/14/02



Decision to Deviate from the Authorization Basis

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Perform an evaluation and determine the following: SEE PAGE 3 FOR EVALUATION. AW 2/14/02

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

Prepared by:

Albert Wong Albert P. Wong 2/14/02
 Print/Type Name Signature Date

Decision to deviate from the AB recommended by:

Don Scribner SA Mark D. ... 2/14/02
 Discipline Manager (Print/Type Name) Signature Date

Richard Grauer Maurice Higuera 2/14/02
 (ES&H) HSA Lead (Print/Type Name) Signature Date

Decision to deviate from the AB approved by:

Steve Foelber Steve Foelber 2/14/02
 Deputy Engineering Manager (Print/Type Name) Signature Date

J. Q. Hicks J. Q. Hicks 2/14/02
 Area Project Manager (Print/Type Name) Signature Date

Deficiency Report Number: _____ Date: _____
 Deficiency Report closed on: _____
 Date

Decision to deviate from the AB closed.

 Deputy Engineering Manager (Print/Type Name) Signature Date

Decision to Deviate from the Authorization Basis

DTD No. 24590-WTP-DTD-C-02-001 Rev. No. 0
Attachment

Perform an evaluation and determine the following:

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

Compacting the material to the specified density requirements ensures the soil condition will support construction of facility structures that meet all applicable laws and regulations, top level standards and principles, and meet applicable SRD safety criteria. Important to safety soil compaction testing is performed to ensure the density requirements are met. Controlling the moisture content increases the confidence that the compaction testing results confirm adequate density has been achieved and reduces the potential for requiring rework to establish the required compaction. Increasing the moisture content range based on experience with the material encountered does not affect the final required soil condition as verified by testing.

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.

This deviation does not involve equipment or processes associated with hazardous materials.