



U.S. Department of Energy
Hanford Site

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S.E. Hudson, Chair
Hanford Advisory Board
Enviroissues Hanford Project Office
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Mr. Hudson:

HANFORD ADVISORY BOARD, CONSENSUS ADVICE #282, TANK FARM VAPORS

The U.S. Department of Energy (DOE) Richland Operations Office and Office of River Protection (ORP) thank you for your February 5, 2015, letter transmitting the Hanford Advisory Board's (Board) Consensus Advice #282, Tank Farm Vapors. DOE remains committed to protecting our workforce, the public, and the environment. Minimizing risks to workers, including chemical vapors in the tank farms, is something DOE and its contractors strive for each day at Hanford.

Washington River Protection Solutions LLC (WRPS) has issued a plan, entitled *Implementation Plan for Hanford Tank Vapor Assessment Report Recommendations* (IP) to address the 47 individual recommendations of the external Tank Vapors Assessment Team (TVAT) in a phased approach. Phase 1 actions will reduce the potential for chemical vapor exposures in the near-term and aid in the effort to more fully evaluate the TVAT bolus (i.e. short-term, acute) exposure hypothesis or other potential exposure pathways. Phase 2 long-term potential actions will be determined following review and analysis of the data and information gathered during Phase 1. ORP has directed WRPS to begin implementing Phase 1 activities.

Below are our responses to the Board's five advice points.

Advice point #1: The Board advises DOE to ensure that proper effective personal protection equipment is made available to all tank farm workers in a timely fashion.

Response: Appropriate personal protective equipment is made available to workers on a daily basis and will continue to be. ORP and WRPS are confident the measures outlined in the IP will reduce reliance on administrative controls and personal protective equipment and increase use of technologies and engineering controls.

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Advice point #2: The Board advises DOE to conduct a follow-up evaluation to identify any long-term health effects for employees who have reported an exposure to chemical vapors over the past 20 years. DOE should use this data as a basis for the need for an epidemiological study of long-term health effects from chemical vapor exposures of tank farm workers, as recommended by the SRNL (Savannah River National Laboratory) Report.

Response: The Tank Vapor Assessment Report overarching recommendation RCH4c: (Medical Surveillance) states, "Routine medical surveillance is a key workplace evaluation tool needed to predict health impairment from vapor exposures; appropriately designed epidemiology studies focused on tank farm workers are recommended to evaluate the potential long-term health consequences." The Tank Vapor Assessment Report IP, which was released on February 10, 2015, addresses this recommendation from the TVAT with several planned actions. Action 1 in the IP, "initiate a review of the medical surveillance program for chemical compounds found within the current IH technical basis and incorporate into the Employee Job Task Analysis (EJTA) program. (Phase 1)," is complete. Actions 2-4 are being pursued and are as follows:

- Action 2 – "Support the study, evaluation, and potential development of epidemiology studies focused on long-term health consequences. (Phase 1)"
- Action 3 – "Ensure that the results from epidemiology studies are communicated to the workforce and incorporate appropriate changes into the existing medical surveillance program. (Phase 2)"
- Action 4 – "Schedule an assessment and follow-up reviews to ensure that the appropriate level of emphasis is placed on the maintenance and incorporation of changes based upon results from related studies, evaluations, and assessments. (Phase 2)"

DOE and its contractors are currently performing the evaluation described in Action 2 ("Support the study, evaluation, and potential development of epidemiology studies focused on long-term health consequences. [Phase 1]") The suggested timeframe (recommended 20 years) to retroactively conduct follow-up evaluations, to identify long-term health effects, will be evaluated as part of this action along with the viability of any proposed epidemiology studies.

Advice point #3: The Board supports accelerated implementation of technologies to detect, identify and control vapor emissions and exposures.

Response: The pursuit of engineering technologies to detect and control vapor emissions and exposures was recommended by the SRNL team. This pursuit is ongoing and is addressed in the recently-issued IP. In February ORP and WRPS conducted a technology exchange with representatives from vendors, small business, universities and national laboratories.

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Advice point #4: The Board advises DOE to issue strong guidance to their third-party insurance administrator and the site medical provider to assure worker medical records document the initial acute symptoms. Thorough documentation is necessary to support compensation claims associated with chemical vapor exposure and ensure workers have timely access to appropriate specialists.

Response: DOE has full confidence in the capabilities of its Third Party Administrator to ensure that the workers' compensation process is followed properly so that workers receive all the benefits to which they are entitled under Washington State Labor and Industries (L&I) regulations. The workers' compensation process relies heavily on medical documentation, which is included in the material provided to L&I, along with other supporting documentation (i.e., human resources, industrial hygiene, event reports). We agree that thorough documentation is important in the processing of workers' compensation claims, and all received information is reviewed for completeness and accuracy by the Third Party Administrator; however, the Third Party Administrator cannot and does not generate any medical records. Additionally, injured workers have the right to select their treatment provider as long as the provider is part of the L&I network, and the Third Party Administrator will assist workers with coordination of appointments when needed. DOE will continue to work closely with our Third Party Administrator contractor to keep a focused watch on customer service and the processing of all workers' compensation claims.

DOE also has full confidence in the capabilities of its Hanford Occupational Medical Services (HOMS) contractor. The HOMS contractor generates documentation that includes the results of an examination provided per a specifically-designed vapor exposure examination protocol that has been subject to independent medical review. When requested by either the employee or the Third Party Administrator, the HOMS contractor provides complete documentation of the worker's visit, including the worker's statement of reported symptoms.

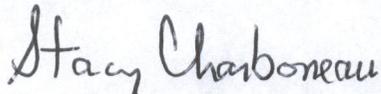
Advice point #5: The Board advises DOE to provide clear communication with workers and the public following vapor exposures.

Response: DOE and WRPS are committed to further reducing the potential for worker exposure to chemical vapors and providing clear communications with the workers and public.

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Thank you for your continued involvement and interest. If you have any questions, please contact Kristen Skopec, Richland Operations Office at (509) 376-5803; or Sharon Braswell, North Wind Solutions at (509) 376-9292.



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