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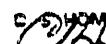
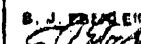
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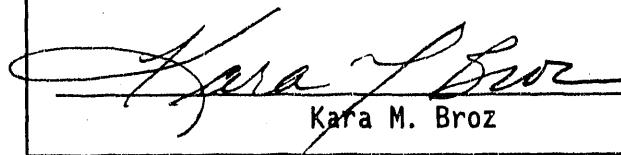
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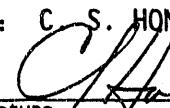
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2. Title TANK 241-TY-101 TANK CHARACTERIZATION PLAN	3. Number WHC-SD-WM-TP-299	4. Rev No. 0
5. Key Words CHARACTERIZATION, DQO, HEALTH AND SAFETY VAPOR ISSUE, FERROCYANIDE, FLAMMABLE, QUALITY CONTROL, SINGLE-SHELL TANK, VAPOR SAMPLING, ANALYSIS, TANK CHARACTERIZATION PLAN	6. Author Name: C. S. HOMI Signature  3/14/95	
Organization/Charge Code 71520/N4168		
7. Abstract This document is a plan which serves as the contractual agreement between the Characterization Program, Sampling Operations, Oak Ridge National Laboratory, and PNL tank vapor program. The scope of this plan is to provide guidance for the sampling and analysis of vapor samples from tank 241-TY-101.		
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WHC-SD-WM-TP-299
Revision 0

**Tank 241-TY-101
Tank Characterization Plan**

Prepared for the U.S. Department of Energy
Office of Environmental Restoration
and Waste Management

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LIST OF ABBREVIATIONS

DOE	U.S. Department of Energy
DNFSB	Defense Nuclear Facilities Safety Board
DQO	Data Quality Objective
DST	Double-Shell Tank
HEPA	High-Efficiency Particulate Air Filter
NCPLX	Non-Complexed Waste
RCRA	Resource Conservation and Recovery Act of 1976
SST	Single-Shell Tank
TBP	Tributyl Phosphate
TCP	Tank Characterization Plan
TMACS	Tank Monitor and Control System
TOC	Total Organic Carbon
TPA	Federal Facility Agreement and Consent Order (Tri-Party Agreement)
TWRS	Tank Waste Remediation System
TY-101	Tank 241-TY-101
USQ	Unreviewed Safety Question
WHC	Westinghouse Hanford Company

1.0 INTRODUCTION

The Defense Nuclear Facilities Safety Board (DNFSB) has advised the U.S. Department of Energy (DOE) to concentrate the near-term sampling and analysis activities on identification and resolution of safety issues (Conway 1993). The data quality objective (DQO) process was chosen as a tool to be used to identify sampling and analytical needs for the resolution of safety issues. As a result, a revision in the Federal Facility Agreement and Consent Order (Tri-Party Agreement or TPA) milestone M-44-00 has been made, which states that "A Tank Characterization Plan (TCP) will also be developed for each double-shell tank (DST) and single-shell tank (SST) using the DQO process... Development of TCPs by the DQO process is intended to allow users (e.g., Hanford Facility user groups, regulators) to ensure their needs will be met and that resources are devoted to gaining only necessary information." This document satisfies that requirement for tank 241-TY-101 (TY-101) sampling activities.

2.0 DATA QUALITY OBJECTIVES APPLICABLE TO TANK 241-TY-101

The sampling and analytical needs associated with the Hanford Site underground storage tanks on one or more of the four Watch Lists (ferrocyanide, organic, flammable gas, and high heat) and the safety screening of all 177 tanks have been identified through the DQO process. DQO's identify the information needed by a program group in the Tank Waste Remediation System (TWRS) concerned with safety issues, regulatory requirements, tank waste processing, or the transport of tank waste. As of January 1995, the DQO's that have been completed and may apply to TY-101 are discussed in the following sections.

Both Watch List and non-Watch List tanks will be sampled and evaluated to classify waste tanks in one of three categories: SAFE, CONDITIONALLY SAFE, or UNSAFE. A tank can be removed from a Watch List if it is classified as SAFE. The Watch List and other safety issue DQO's identify the requirements used to determine which classification to place a tank, based on analyses that indicate if certain measures are above or below established thresholds. The measures begin with the determination of the concentration of primary analytes which have been considered indicators of potentially unsafe conditions within a tank. If a specific criteria level on one of these items is exceeded, further analysis and a possible change in tank classification, may be required.

2.1 SAFETY SCREENING DATA QUALITY OBJECTIVES

The *Tank Safety Screening Data Quality Objective* (Redus and Babad 1994) describes the sampling and analytical requirements that are used to screen waste tanks for unidentified safety issues. This DQO requires that a vertical profile of the tank waste be obtained from at least two widely spaced risers. This vertical profile may be obtained using core, auger, or grab samples. The primary analytical requirements for the safety screening of a tank are energetics, total alpha activity, moisture, and flammable gas concentration. The safety screening analyses shall be applied to all core samples, DST Resource Conservation and Recovery Act (RCRA) samples, and auger samples, except those taken exclusively to assess the flammable gas crust burn issue.

2.2 WATCH LIST DATA QUALITY OBJECTIVES

Based on the current classification of the tank, the Watch List DQO applicable to tank TY-101 is *Data Requirements for the Ferrocyanide Safety Issue Developed through the Data Quality Objective Process* (Meacham et al. 1994). The DQO for the ferrocyanide safety issue concluded that the most reliable information is obtained from two widely spaced core samples. Two primary parameters, sodium nickel ferrocyanide concentration and moisture content, determine whether a tank is SAFE, CONDITIONALLY SAFE, or UNSAFE.

2.3 FUGITIVE VAPOR EMISSION DATA QUALITY OBJECTIVES

The Tank Vapor Issue Resolution Program was initiated in 1992 to resolve the health and safety issues associated with the high level waste tanks at the Hanford Site. The two main issues related to this program are 1) an insufficient understanding of reported exposures of tank farm personnel to unacceptable levels of noxious vapors and 2) the risks to worker health and safety cannot be determined until the vapors in the waste tanks are well characterized. Westinghouse Hanford Company (WHC) standard safety practices dictate that any flammable components in the head space of any Watch List tank must be determined and quantified before intrusive work can be conducted on these tanks. The DQO applicable to head space vapor sampling is *Data Quality Objectives for Generic In-Tank Health and Safety Vapor Issue Resolution* (Osborne et al. 1994).

A nitrogen gas purge will be used to clear and cool the drill bit during rotary core sampling. This purge gas exhausts into the waste tank head space and over the operating period could potentially pressurize the head space resulting in an uncontrolled release of pollutants. A portable modular unit has been developed to exhaust the tank head space during rotary core sampling. This modular unit will remove airborne particles through high efficiency particulate air (HEPA) filters, but is not designed nor equipped to treat or remove toxic vapors. It is equipped with instruments to monitor and alarm for total organic carbon (TOC) and ammonia vapors. The tank head space must be characterized to confirm that the modular unit can be safely started and to establish acceptable TOC and ammonia levels for safe operation. The applicable DQO is *Rotary Core Vapor Sampling Data Quality Objective* (Price 1994).

Tank TY-101 is one of the 36 tanks on the "Suspect Tank List" (Osborne and Huckaby 1994b). This list is composed of Ferrocyanide and Organic Watch List tanks, plus seven tanks with a history of vapor incidents.

3.0 TANK HISTORICAL INFORMATION

This section summarizes the available information for tank TY-101. Included are the present status and physical description of the tank, its age, process history, and the expected contents of the tank based on historical information.

3.1 JANUARY 1995 TANK STATUS

Tank TY-101 was officially added to the Ferrocyanide Watch List in January 1991. The amount of FeCN reported for the tank is 23,000 g-mol. The tank waste temperature is monitored continuously by the Tank Monitor and Control System (TMACS). The highest waste temperature reading taken on October 27, 1994, from riser #4, was 22 °C (72 °F), which did not exceed the maximum temperature criteria (Hanlon 1994).

This tank currently contains non-complexed (NCFLX) waste with a total waste volume

of 447,000 liters (118,000 gallons), which is equivalent to 97 centimeters (38 inches) of waste as measured from the baseline of the tank. The current surface level, as read manually and on a quarterly basis with a Food Instrument Corporation gauge located on riser #1, is 125 centimeters (49.2 inches). The waste is comprised entirely of sludge, with no supernatant liquid or saltcake present (Hanlon 1994).

3.2 TANK CONFIGURATION

Tank TY-101 is one of six single-shell tanks in the 200 West Area TY Farm. Tank TY-101 is 23 meters (75 feet) in diameter and 7 meters (23 feet) in operating depth. It has a concave-shaped base and a design capacity of 2.87 million liters (758,000 gallons). However, safety considerations require a maximum operating capacity of 2.84 million liters (750,000 gallons). The tank has three active dry wells monitoring radiation in the surrounding soil (Hanlon 1994).

The tank is first in a cascade flow series consisting of tanks TY-101 and 241-TY-102. A cascade system consists of tanks connected in series by pipes. When the primary tank in the system became full, the waste would then flow to the secondary tanks in the system.

3.3 TANK HISTORY

Tank TY-101 was constructed between 1951 and 1952 and was put into service in 1953. Initially tank TY-101 received 2.87 million liters (758,000 gallons) of evaporator bottoms waste. In 1954, the tank began receiving first cycle decontamination waste from the BiPO₄ process from B Plant and T Plant. In 1955, supernate was pumped to tank 241-TY-118. Tank TY-101 continued to receive decontamination waste through 1959. During the third quarter of 1959, tank TY-101 received waste from tank 241-TY-106 consisting of tributyl phosphate (TBP) uranium extraction process waste from U Plant. In 1967, tank TY-101 received from tank 241-SX-103 high-level waste from the reduction oxidation process. From 1973 to 1975, because of suspected leaks, a series of transfers took place to tanks 241-C-104, 241-T-104, 241-TX-118, and 241-TY-102.

The tank was classified as a suspect leaker in 1974, was removed from service in 1975, and was labeled inactive in 1977. Tank TY-101 is passively ventilated. Primary stabilization on the tank was completed in 1978. The tank is of questionable integrity. The last solids volume update was obtained on April 28, 1982 and the last photo was taken on August 22, 1989. Figure 1 summarizes the influx and effluent history of tank TY-101 (Anderson 1990).

3.4 EXPECTED TANK CONTENTS

The contents of tank TY-101 are expected to consist of a two-layered sludge. The bottom layer is approximately 26,500 liters (7,000 gallons) of first cycle decontamination and TBP waste. The top layer is TBP waste from the REDOX separation process (Winters 1990). Some evaporator bottoms waste was added to tank TY-101 early in its operating life, but may not form a distinct layer due to the large number of transfers to and from the tank. Weiss and Mauss (1987) describes three visually distinct layers (brown on top, changing to white in the middle, and becoming green on the bottom), but does not address the possible origins of the layers. Tables 1 and 2 summarize the most current characterization data and the results of a core composite analysis, performed at the 222-S Laboratory, for tank TY-101 (Weiss and Mauss 1987).

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Figure 1: Fill History of Tank 241-TY-101

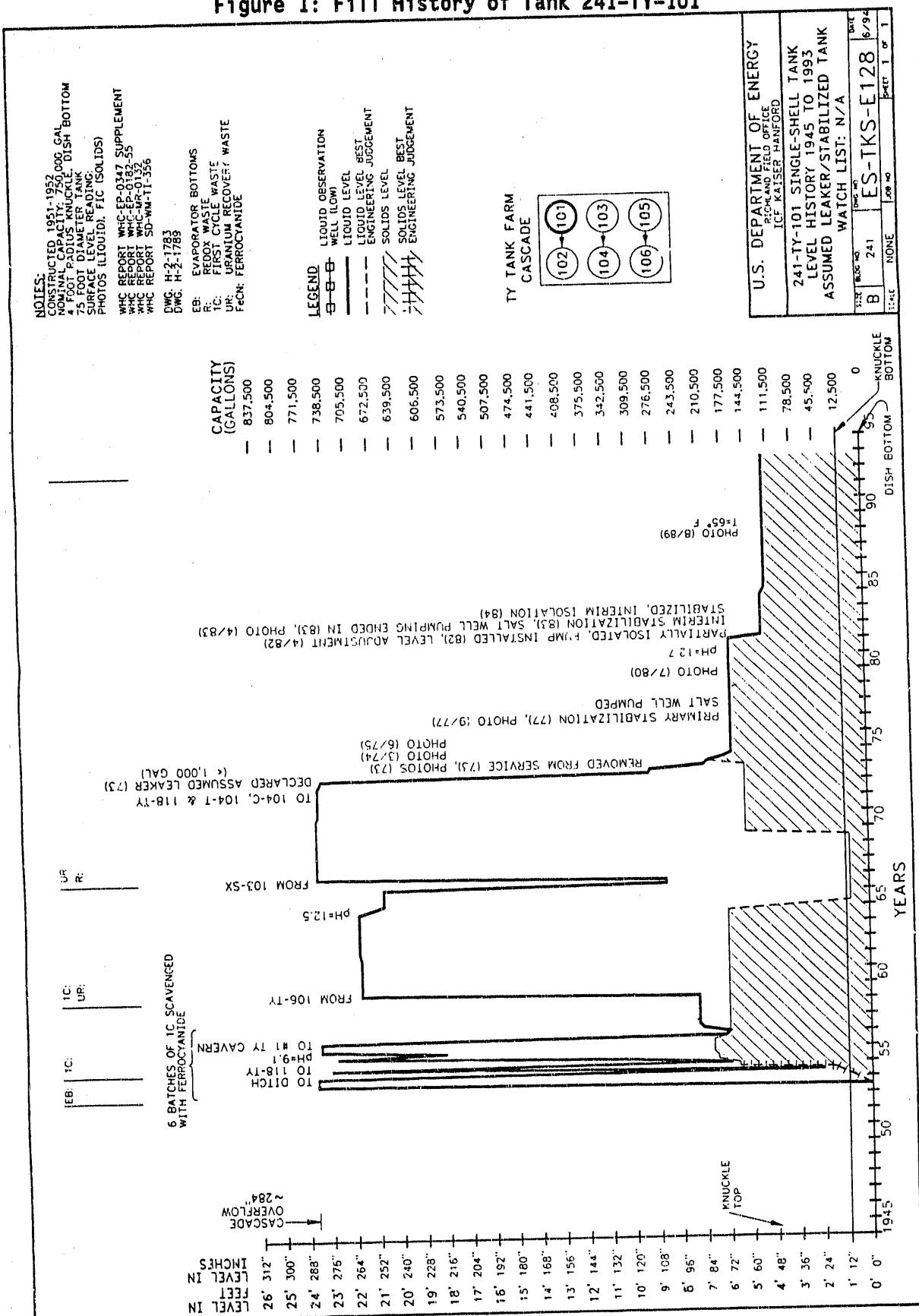


Table 1: Tank TY-101 Core Composite Chemical, Radiochemical, and Physical Characterization Data¹

Physical Data	Value	
Total Solid Waste	732,000 kg (118,000 gallons)	
Radiation	10 mR/hour	
Specific Heat	0.6 J/g°C	
Bulk Density	1.64 g/ml	
Particle Size	8.2 μm	
Viscosity	10,000 cP	
pH	8.2	
Total Organic Carbon	1,090,000 μg/l	
Analytes	μg/g	μg/ml
Na	121,000	198,000
Al	29,100	47,700
Ba	1,920	3,150
NO _x	145,000	238,000
Bi	27,200	44,600
Cd	8.66	14.2
Cr	8,410	13,800
Fe	40,200	65,900
F	3,370	5,530
Cl	756	1,240
Pb	218	358
Mn	542	889
Ni	5,100	8,360
P	25,300	41,500
Si	38,700	63,500
Ag	3.85	6.31
Zr	377	618
U	2,330	3,820
Radionuclides	μCi/g	μCi/l
Total Gamma	0.284	466
⁹⁹ Tc	0.007	12.1
^{239/240} Pu	0.191	313
¹³⁷ Cs	0.284	466
⁹⁰ Sr	12.4	20,300

¹(Weiss and Mauss 1987)

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Table 2: Tank TY-101 Filtrate Chemical, Radiochemical, and Physical Characterization Data

Chemical Components			Physical Data	
Component	µg/ml	wt%	% Water	90.8
NaAlO ₂	32.8	0	Specific Gravity	1.09
NaOH	2000	0.18		
NaNO ₂	2760	0.24		
NaN ₃	107,000	9.82		
Na ₂ CO ₃	1,060	0.1	Radiochemical Components	
TOC	0.2	0.06	Component	µCi/l
NaPO ₄	18,000	1.68	¹³⁷ Cs	77.0
Na ₂ SO ₄	5,680	0.54	⁹⁰ Sr	10.4

¹(Weiss and Mauss 1987)

4.0 STRATEGY FOR WASTE CHARACTERIZATION AND SAFETY ISSUE RESOLUTION

The DQO requirements for sampling and analyses are integrated and compared with scheduled sampling and analysis activities in this section.

4.1 SAMPLING OF TANK TY-101 IN THE NEAR TERM

The characterization objectives in fiscal year 1995 involve sampling of tanks to identify and resolve safety issues. Head space vapor sampling in April 1995 and rotary core sampling in June 1995 are scheduled for tank TY-101. No other sampling is scheduled through fiscal year 1997 (Stanton 1994). The head space vapor sampling shall be conducted following *Data Quality Objectives for Generic In-Tank Health and Safety Vapor Issue Resolution* (Osborne et al. 1994) and *Rotary Sampling Core Vapor Sampling Data Quality Objective* (Price 1994). Vapor sampling will satisfy part of the requirement specified in TPA Milestone M-40-08 to complete the vapor sampling of all Ferrocyanide Watch List tanks (Osborne and Huckaby 1994b).

Rotary core sampling shall be conducted following *Tank Safety Screening Data Quality Objective* (Redus and Babad 1994) and *Data Requirements for the Ferrocyanide Safety Issue Developed Through the Data Quality Objective Process* (Meacham et al. 1994). These two sampling and analysis events, if successful, will also satisfy the January 1995 applicable DQO requirements. These requirements are summarized in Table 3. A more complete list of analytical requirements are given as an appended revision, in the appropriate sampling and analysis plan.

Table 3: Integrated DQO Requirements

Sampling Event	Applicable DQO	Sampling Requirements	Analytical Requirements
Vapor Sampling	-Health & Safety Vapor Issue Resolution DQO -Rotary Sampling Core Vapor Sampling DQO	3 SUMMA® canisters 12 Triple Sorbent Traps 6 Sorbent Trap Systems	Gas Flammability Gas Toxicity -Organic Vapors -Permanent Gases
Rotary Sampling	-Safety Screening DQO -Ferrocyanide DQO	2 core samples from risers separated radially to the maximum extent possible	Energetics, TOC, Total Alpha, Beta & Gamma, Moisture, CN, Major Anions & Cations, TIC, Radionuclides, Density, Flammable Gas Concentrations

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APPENDIX A

TANK TY-101
SAMPLING AND ANALYSIS PLAN FOR
VAPOR SAMPLING IN FISCAL YEAR 1995

WHC-SD-WM-TP-299, REV 0

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LIST OF ACRONYMS FOR APPENDIX A

BEL	Biological Exposure Limit
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act of 1980
CES	Consensus Exposure Standards
CGM	Combustible Gas Meter
DOT	Department of Transportation
DQO	Data Quality Objective
EPA	Environmental Protection Agency
ESH&QA	Environmental Safety, Health, and Quality Assurance
GC/MS	Gas Chromatography/Mass Spectrometry
HEPA	High-Efficiency Particulate Air Filters
IC	Ion Chromatography
IDLH	Immediately Dangerous to Life and Health
LFL	Lower Flammability Limit
ORNL	Oak Ridge National Laboratory
PEL	Permissible Exposure Limit
PNL	Pacific Northwest Laboratory
ppbv	parts per billion by volume
ppmv	parts per million by volume
QAPP	Quality Assurance Project Plan
RCRA	Resource Conservation and Recovery Act
SAP	Sampling and Analysis Plan
SML	Sampling and Mobile Laboratories
SUMMA®	registered trademark for passivated stainless steel canister of the Oregon Graduate Institute of Science and Technology
TCP	Tank Characterization Plan
TLV	Threshold Limit Value
TNMHC	Total Non-Methane Hydrocarbons
TO-14	EPA Toxics Organics Protocol 14
TRP	Toxicology Review Panel
TST	Triple Sorbent Trap
TWRS	Tank Waste Remediation System
TWAP	Tank Waste Analysis Plan
TY-101	Tank 241-TY-101
VSS	Vapor Sampling System
WHC	Westinghouse Hanford Company

A1.0 INTRODUCTION

Tank 241-TY-101 (TY-101) is scheduled to be sampled for flammability and toxicity of vapor in the headspace of the tank. This Appendix A is intended to address only the scheduled vapor sampling and analysis for the fiscal year 1995. Present vapor sampling systems include Type 2 (In Situ Sampling, or ISS) and Type 3 (the Vapor Sampling System, or VSS). These two sampling systems are operated by Sampling and Mobile Laboratories (SML). Both the VSS and ISS collect condensable and non-condensable gases from the tank, they just do it differently. The VSS used a heated vapor probe and collects the sample out of the tank. The ISS lowers the sorbents and TST into the tank headspace for the condensable gases and collects SUMMA®s out of the tank for permanent gases.

A2.0 SAMPLING AND ANALYSIS SCHEME

The following sections provide the methodology and procedures to be used in the preparation, retrieval, transport, analysis, and reporting of results from vapor samples retrieved from tank TY-101. The requirements for this sample event, contained within this appendix of the TCP, are within the scope of work specified in the appropriate laboratory work authorizing documents. Any decisions, observations, or deviations to this sampling and analysis plan made during sample receipt, preparation and analysis shall be documented in controlled notebooks and justified in the deliverable report. The general sampling and analysis scheme for Type 3 vapor sampling is presented as a flowchart and narrative in Figure A-1.

A2.1 VAPOR SAMPLING EVENT

The responsibilities of Sampling and Mobile Laboratories (SML) to this sampling event are given in this section. For detailed information regarding applicable operating procedures for the tank TY-101 vapor sampling activity refer to work package WS-95-00018. Additional quality control and deliverable requirements are given in Sections A3.0 and A6.0. of this appendix.

A2.1.1 Flammability Test

Prior to this sampling event and any intrusive work on this tank, an assessment of the flammability of the tank head space gases is required by WHC safety practices. The flammability test is performed by Industrial Hygiene Field Services using a combustible gas meter (CGM). The procedure for this flammability test is included in the sampling event work package.

- If the tank vapor fuel content is greater than or equal to 20% of the lower flammability limit (LFL) under steady state conditions, then all sampling activities must stop until further authorization is given by management.
- If CGM measures a total fuel content between 10% and 20% of the LFL, vapor sampling activity may continue under CGM monitoring to better identify the hazard level.
- If the concentration is below 10% of the LFL, the tank is not considered have a flammability hazard and all sampling work can proceed (Osborne 1994).

A2.1.2 Sample Collection Using SUMMA® Canisters And Sorbent Tubes

SML shall provide sample identification numbers to the laboratories according to the format given in Section A3.1. SML shall use labeled sample containers supplied by the laboratory (see Section A2.2.1, Preparation of Sample Media Containers) to collect vapor samples. The VSS shall be used to collect vapor from tank TY-101 in accordance with SML procedure WHC-IP-1127(4.5) "Collection of SUMMA® Canisters and Sorbent Tube Sampling Using the Vapor Sampling System (VSS)". The sample type, type of collection media to be used, and the number of samples requested are given in Table A-1.

Table A-1: General Sampling Information

Sample Container	Prepared By	Preparation Procedure	Sample Type	Number of Samples
SUMMA®	PNL	PNL-TVP-02	Tank Air	3
SUMMA®	PNL	PNL-TVP-02	Ambient Air ¹	2
Triple Sorbent Traps (TST)	ORNL	AC-OP-300-0907 CASD-AM-300-WP01 ²	Tank Air	12
	ORNL	AC-OP-300-0907	Field Blank	2
	ORNL	AC-OP-300-0907	Trip Blank	2
Sorbent Trap System for NH ₃ , NO ₂ , NO, H ₂ O	PNL	PNL-TVP-09	Tank Air	6
	PNL	PNL-TVP-09	Trip Blank	3
Tritium Trap	WHC	LA-548-111	Tank Air	1
HEPA Filters	WHC	N/A	Tank Air	4

¹One sample taken through the VSS, one sample taken upwind of the tank.

²Preparation procedure for samples spiked with surrogate(s).

Table A-2 provides a sequence of sampling activities along with sample collection times and the flow rates through sample collection tubes. A cleanliness check of the sampling system shall be performed in accordance with procedure WHC-IP-1127(4.5) Appendix C. A cleanliness check of the VSS shall also be performed by collecting ambient air SUMMA® samples prior to sampling the tanks using the following conditions: 1) with the VSS manifold and transfer line fully heated, and 2) without the VSS, upwind of tank TY-101.

Organic vapors shall be monitored using the GC/FID during the sampling event. The operating procedure for the GC/FID is provided in the procedure WHC-IP-1127(4.5) and Bellus (1993). The sampling team is responsible for documenting any problems and procedural changes affecting the validity of the sample in a field notebook.

Table A-2. List of Samples and Activities for Tank TY-101.

SAMPLE CODE	SAMPLE/ACTIVITY DESCRIPTION	SAMPLER POSITION DURING COLLECTION	GAS FLOW RATE	SAMPLE DURATION
--	Adjust VSS temperature setpoint to 40°C ¹	N/A	N/A	N/A
--	Purge VSS with ambient air ²	N/A	5,450 mL/min	30 min.
01	Collect ambient air sample SUMMA #1	Upwind of TY-101	N/A	1 min.
--	Perform cleanliness check	N/A	N/A	N/A
02	Collect ambient air sample SUMMA #2	Port 15	N/A	1 min.
--	Leak test	N/A	N/A	N/A
--	Purge VSS with tank air	N/A	5,450 mL/min	30 min.
--	Measure tank pressure	N/A	N/A	N/A
03	Collect Tritium Trap	Sorbent line 8	200 mL/min	5 min.
--	Collect GC sample and initiate GC run ³	N/A	N/A	N/A
04	Collect SUMMA #3	Port 11	N/A	1 min.
05	Collect SUMMA #4	Port 13	N/A	1 min.
06	Collect SUMMA #5	Port 15	N/A	1 min.
07	Collect Triple Sorbent Trap (TST) sample #1	Sorbent line 9	50 mL/min	4 min.
08	Collect TST sample #2	Sorbent line 10	50 mL/min	4 min.
09	Collect TST sample #3	Sorbent line 8	50 mL/min	4 min.
10	Open, close, & store TST Field Blank #1	In VSS truck	0 mL/min	N/A
11	Collect TST sample #4	Sorbent line 10	50 mL/min	4 min.
12	Collect TST sample #5	Sorbent line 9	200 mL/min	5 min.
13	Collect TST sample #6	Sorbent line 10	200 mL/min	5 min.
14	Collect TST sample #7	Sorbent line 8	200 mL/min	5 min.
15	Collect TST sample #8	Sorbent line 10	200 mL/min	5 min.
16	Collect TST sample #9	Sorbent line 9	200 mL/min	20 min.
17	Open, close, & store TST Field Blank #2	In VSS truck	0 mL/min	N/A
18	Collect TST sample #10	Sorbent line 10	200 mL/min	20 min.
19	Collect TST sample #11	Sorbent line 8	200 mL/min	20 min.
20	Collect TST sample #12	Sorbent line 10	200 mL/min	20 min.
21, 22	Store TST Trip Blanks #1 & #2	None	None	None
23	Collect NH3/NOx/H2O Sorbent Trap #1	Sorbent line 9	200 mL/min	15 min.
24	Collect NH3/NOx/H2O Sorbent Trap #2	Sorbent line 10	200 mL/min	15 min.
25	Collect NH3/NOx/H2O Sorbent Trap #3	Sorbent line 8	200 mL/min	15 min.
26	Collect NH3/NOx/H2O Sorbent Trap #4	Sorbent line 10	200 mL/min	15 min.
27	Collect NH3/NOx/H2O Sorbent Trap #5	Sorbent line 9	200 mL/min	15 min.
28	Collect NH3/NOx/H2O Sorbent Trap #6	Sorbent line 10	200 mL/min	15 min.
29, 30, 31	Store NH3/NOx/H2O Trap Trip Blanks #1, #2, & #3	None	None	None
32	Remove upstream HEPA Filter from HEPA transfer box	Upstream of box	Continuous	
33	Remove downstream HEPA Filter from HEPA transfer box	Downstream of box	Continuous	
34	Remove upstream HEPA Filter from VSS	Upstream of VSS	Continuous	
35	Remove downstream HEPA Filter from VSS	Downstream of VSS	Continuous	

1 Current (12/12/94) waste temperature is 22.0 °C.

2 Not required if ambient air purge incorporated in VSS setup.

3 Additional GC runs may be performed to obtain organic data and to assure cleanliness of the system at the discretion of the sampling scientist and shall be identified in the deliverable report. Organic data obtained from the on-line GC is developmental.

A2.1.3 Radiation Screening and Sample Transport

All vapor samples shall be stored under chain-of-custody requirements by SML while performing a radiological survey of certain items used during sampling. Surveys are conducted to assure compliance with Department of Transportation (DOT) shipping regulations and offsite laboratory acceptance criteria. Items surveyed include four HEPA filters and one tritium trap and are analyzed following procedures specified in Table A-4 (Bratzel 1994).

The results from the radiation screening are submitted to and shall be evaluated by Sampling and Mobile Laboratories (SML) to ensure the samples meet the analytical criteria specified in Table A-3. SML shall provide a Format II report to each analytical laboratory to specify survey results (refer to Section A6.2).

Trip blanks and field blanks are to accompany the waste samples to the laboratory. For specific information concerning sample and blank handling, custody, and transport refer to quality assurance/quality control requirements in Section A3.1.

Table A-3. Limits For Acceptable Radionuclide Activity Levels.

Organization	Total α	Total β/γ	Total $\alpha/\beta/\gamma$	Units
PNL Analytical Chemistry Laboratory	≤ 100	≤ 400	N/A	pCi/g
Oak Ridge National Laboratory	≤ 135	≤ 450	N/A	pCi/g
WHC-CM-2-14	N/A	N/A	≤ 2000	pCi/g

A2.2 LABORATORY ANALYSIS

The responsibilities of the analytical laboratories to this sampling event are given in this section. Additional quality control and deliverable requirements are given in Sections A3.0 and A6.0.

A2.2.1 Preparation of Sample Media Containers

The laboratory performing the contracted analytical work shall supply labeled sample containers (SUMMA® canisters and selective sorbent media) to SML at least 48 hours in advance of the scheduled sampling date. Each sample media container shall be certified as clean and prepared according to procedures called out in Table A-1.

A2.2.2 Sample Analysis

Sample material retrieved from the tank TY-101 vapor space and contained within the SUMMA® canisters shall be analyzed for organic compounds following modified EPA procedure T0-14 and for permanent gases CO₂, CO, CH₄, H₂, and N₂O using gas chromatography. The sorbent traps contain analyte-specific sorbent media and shall be analyzed for these specific analytes. The triple sorbent traps contain sorbent media designed to allow a broad range of organic species to be retained. Table A-4 identifies the appropriate laboratory procedures used in each analysis.

One SUMMA® canister shall be archived at the PNL Laboratory following receipt and control procedure PNL-TVP-07 for six months or until instructed by the Tank Vapor Program to clean the canister for reuse. If necessary, requirements for further quantification and speciation shall be conveyed through a Letter of Instruction by the Characterization Program and/or revision to this Tank Characterization Plan.

Any analyses prescribed by this document, but not performed, or other deviations, shall be identified and include justification in the appropriate data report.

A2.2.3 Insufficient Samples

Unlike a solid sample which may have full or partial recovery, vapor sample media contain either good, bad, or no sample. A sample that is bad or empty may not have a proper seal. Partial recovery of a vapor sample is not an issue, however, the number of good samples may be an issue. All good samples, except the SUMMA® canister archive, shall be analyzed. If there are insufficient good samples to perform all requested analyses, the Characterization Program Office and the Tank Vapor Issue Resolution Program shall be notified. The SUMMA® canister archive shall be used if one or more of the SUMMA® canister samples is compromised.

Figure A-1. Test Plan Outline and Flowchart for Tank Vapor Space Characterization.

Step 1. (Labs) Prepare sample and blank containers at contract laboratories. Label containers using sample identification numbers and sampling data provided by SML.

Step 2. (Labs) Ship Containers to SML at least 48 hours in advance of scheduled sampling event. Shipping, receiving, and control of containers shall be guided by procedures WHC-IP-1127(1.3) (for SML), and either PNL-TP-07 (for PNL) or CASD-AM-300-TP02 (for ORNL).

Step 3. (SML) If tank is safe with regard to flammability, set up vapor sampling system (VSS) and collect samples following procedure WHC-IP-1127(4.5) and guidelines in Table A-2.

Step 4. (SML) Move the vapor sample containers to custody locked storage. Submit the HEPA filters and Tritium trap to the 222-S Laboratory for radiological survey.

Step 5. (SML) Using radiological survey results, determine if samples are acceptable to ship offsite (see Table A-3).

Step 6. (SML) If determined to be acceptable according to offsite laboratory requirements and WHC-CM-2-14, ship sample and blanks. If not acceptable to ship, maintain samples in storage and contact the Tank Vapor Issue Resolution Program for further direction.

Step 7. (Labs) Perform laboratory analyses (see Table A-4 for procedure numbers).

A. SUMMA Canisters (PNL): Perform organic vapor analysis by modified EPA-T0-14. Perform permanent gas analysis for the following: H₂, CO, N₂O, CH₄, CO₂.

B. Sorbent Traps (PNL): Perform gravimetric analysis for moisture. Perform selective electrode analysis for NH₃. Analyze NO and NO₂ Traps.

C. Triple Sorbent Traps (ORNL): Perform organic vapor analysis.

Step 8. (Labs and SML): Following the Section A6.0 reporting requirements, deliver a Format VI report to the Tank Vapor Issue Resolution Safety Program.

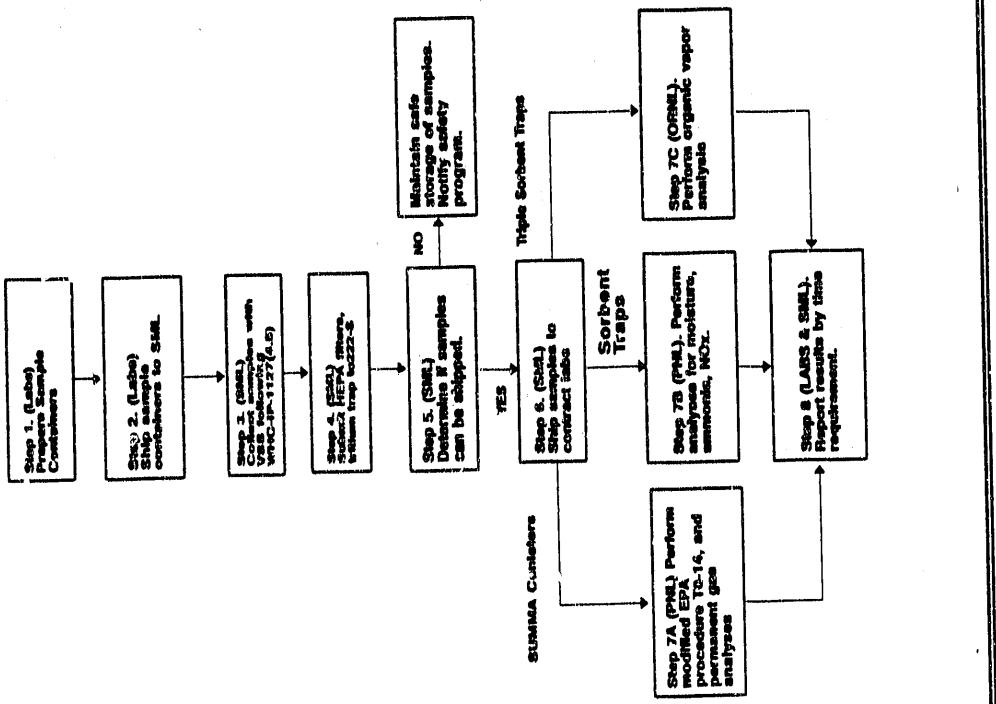


Table A-4 TV-101 Sample Chemical Requirements

REPORT FORMATS										NO. OF SAMPLE/BLANK CONTAINERS PROCESSED			
TY-101 VAPOR		COMMENTS		REPORT FORMATS		NO. OF SAMPLE/BLANK CONTAINERS PROCESSED		REPORT FORMAT		CRITERIA			
Plan Number	WRC-SD-WM-TP-299	Type 3 vapor sampling system (VSS) using heated vapor probes.	Early Notify	Organization	WRC	PNL	ORNL	TOTAL	WRC	PNL	ORNL		
Tank	TY-101	J. W. Osborne	Process Control	SUMMA® Canister	3/2	3/2	5	5	3/2	3/2	5		
Program Contact	R.D. Schreiber	C. S. Homi	Safety Screen	Sorbent Trap System	IV	IV	IV	9	6/3	6/3	9		
TRRS Contact			Waste Management	Triple Sorbent Trap	V	V	V	16	12/4	12/4	16		
Lab Project Coordinator	S. C. Gohreen (PNL)	R. A. Jenkins (ORNL)	RCRA Compliance	HEPA Filter	VI	VI	VI	4	4	4	4		
PRIMARY ANALYSES													
ANALYSIS METHOD	PRIMARY ANALYTE	PROCEDURE	LAB	SAMPLE PREP	SAMPLE CONTAINER	SURVEY	NO. OF BLANKS	NO. OF BLANKS	NOTIFICATION LIMIT (NLL)	EXPECTED RANGE	PRECN at NLL		
EPA TG-14 GC/MS	Organic* Speciation	PNL-TVP-01 PNL-TVP-02 PNL-TVP-03	PNL	Direct	SUMMA®	3	none	2	N/A	≥ 4000 ppm	≥ 25%		
GC/TCD	CO ₂ CO CH ₄ H ₂ O	PNL-TVP-05 PNL-TVP-02	PNL	Direct	SUMMA®	3	none	2	≥ 20% LFL ≥ 20% LFL ≥ 20% LFL	≥ 20% IDLH for all others*	not available		
IC	NO _x NO ₂	PNL-TVP-09 PNL-ALD-212	PNL	H ₂ O Extraction	Sorbent Trap	6	none	3	≥ 50 ppm ≥ 25 ppm	≥ 2 ppm ≥ 0.1 ppm	≥ 25%		
Gravimetric	H ₂ S	PNL-TVP-09	PNL	Direct	Sorbent Trap	6	none	3	N/A	≥ 3 mg/L	≥ 25%		
Selective Electrode GC/MS	NH ₃	PNL-TVP-09 PNL-ALD-226	PNL	Extraction	Sorbent Trap	6	none	3	≥ 250 ppm	≥ 2 ppm	≥ 25%		
Organics**	Organics**	AC-PM-1-033153 CASD-OP-300-WP03 CASD-OP-300-WP04 CASD-OP-300-WP05 CASD-OP-300-WP06	ORNL	Thermal Desorption	Triple Sorbent Trap	12	all	4	≥ 4000 ppm n-Butanol, 50% IDLH for all others**	not available	≥ 25%		
Total α	Radon	LA-508-110	WRC	Direct	HEPA Filter	4	N/A	N/A	>60 pCi/g α	<60 pCi/g α	≥ 25%		
Total β	Daughters	LA-508-111 LA-508-162	WRC	Direct	HEPA Filter	4	N/A	N/A	>200 pCi/g β	<200 pCi/g β	≥ 25%		
Total γ	Radon Daughters	LA-508-111 LA-508-162	WRC	Direct	HEPA Filter	4	N/A	N/A	>200 pCi/g γ	<200 pCi/g γ	≥ 25%		
Liq. Scin.	Tritium	9	LA-548-111	WRC	Direct	Tritium Trap	1	N/A	N/A	not available	N/A		
GR/ED/	Organics	WRC-TP-1127(1.3)	SMI	Direct	On-line	N/A	N/A	N/A	N/A	N/A	N/A		

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N/A: Not Applicable No extra canisters, except archive, will be stored by PNL.
 System contains individual sorbent media sections for NO_x, NH₃, & H₂O.

Multiple samples and blanks are taken

Samples spiked with surrogates. Action required if any compound exceeds two trip and two field blank.

**Acetone, acetonitrile, benzene, butanol, n-dodecane, n-hexane, propane nitrile, tributyl phosphate, n-tridecane. Other organic species detected at the level deemed sufficient by the Toxicology Review Panel to be of potential environmental concern, shall be reported following Format 1.

A3.0 QUALITY ASSURANCE & QUALITY CONTROL

This Tank Characterization Plan and analytical laboratory operations are approved by the WHC Environmental Safety, Health, and Quality Assurance (ESH&QA) Program provided the following conditions are met.

- 1) Each laboratory has a quality assurance program that meets the applicable requirements of DOE order 5700.6C, or United States 10 CFR 830.120. In addition, it must also meet the requirements of QAPP-013 (Keller 1994) and when implemented in August 1995, the *Hanford Analytical Services Quality Assurance Plan* (DOE 1994).
- 2) Each analysis and media preparation procedure given in Tables A-1 and A-4 are documented by the laboratory and available to ESH&QA.
- 3) Any modifications made to, or deviations from, the prescribed procedures are documented in controlled notebooks and justified in the deliverable report.

The PNL tank vapor program is governed by a QA Plan (Barnes 1995). ESH&QA will qualify laboratories for continued use by the TWRS Characterization Program after receipt of a QA plan, followed by an audit and corrective action phase.

A3.1 Sampling Operations

SML shall provide unique sample label and identification numbers to the laboratories. Each sample identification number shall have the following format:

SXXXX-WYY-LLL, where:

XXXX = unique number assigned to the sampling event,
 W = a letter code indicating the day of a multi-day sampling event,
 YY = a 2-digit sample code found in Table A-2, List of Sample and Activities, column one.
 LLL = a special lab assigned code.

Once the sample collection media has been received by SML from the laboratory, it shall remain in the physical control of the custodian, locked in a secure area, or prepared for shipping with tamper evident tape under conditions specified on the chain-of-custody form and in accordance with laboratory operating procedure WHC-IP-1127(1.3) "Chain-of-Custody for RCRA and CERCLA Protocol Samples".

Applicable operating procedures for the tank TY-101 vapor space sampling activities are contained in work package WS-95-00018. Vapor samples, trip blanks, and field blanks are to be collected in accordance with Tables A-1 and A-2 and laboratory operating procedure WHC-IP-1127(4.5) "Collection of SUMMA® Canisters & Sorbent Tube Samples Using the Vapor Sampling System (VSS)" and shipped to the laboratory in accordance with Hazardous Material Packaging and Shipping, WHC-CM-2-14.

All sampling activities shall be documented in controlled field logbooks maintained by sampling personnel (SML) and shall contain, but are not limited to:

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- 1) identification of tank and riser number and photographs of the sample location in which the sampling is conducted,
- 2) if any anomalies are observed, corresponding sample identification numbers, flow rates, pressures, temperatures, and other operational parameters affecting the sample,
- 3) any conditions that the sampler may observe during the sampling event (i.e., odors, nearby machinery in operation, etc.),
- 4) names and titles of personnel involved in the field activity and their responsibilities,
- 5) instrument calibration dates.

SML is responsible for documenting any problems and procedural changes affecting the validity of the sample in a controlled field notebook and shall enter this information in the comment section of the chain-of-custody form for addition to the data reports.

A3.2 Laboratory Operations

The SUMMA® canisters and Sorbent Trap Systems shall be prepared, certified, and labeled by the performing laboratories following the laboratory quality control procedures identified in Table A-1. The laboratory supplying the sample collection media shall initiate the chain-of-custody in accordance with the laboratory operating procedure WHC-IP-1127(1.3), "Chain-of-Custody for RCRA and CERCLA Protocol Samples" using sample label and identification numbers provided by SML.

The sample receipt and control procedure used in the PNL laboratory is PNL-TVP-07. Oak Ridge National Laboratory shipping and receiving is done by procedure CASD-OP-300-WP02. Analyses shall be performed following the procedures in Table A-4.

Method specific quality control such as calibrations and blanks are also found in the analytical procedures. Sample quality control (duplicates, spikes, standards) specified in the applicable DQO's are identified in Table A-4. Due to the developmental work being done with the analysis procedures and potential sample differences (between tanks), changes in procedures may be needed.

A4.0 ORGANIZATION

The organization and responsibility of key personnel involved in this tank TY-101 vapor sampling project are listed in Table A-5.

Table A-5: Tank TY-101 Project Key Personnel List

Individual(s)	Organization	Responsibility
S. C. Goheen	Pacific Northwest Laboratory	Project Manager for Vapor Sample Characterization
R. A. Jenkins	Oak Ridge National Laboratory	Project Manager for Vapor Sample Characterization
J. G. Kristofzski	WHC 222-S Laboratory	Project Manager for Sample Radiological Survey
R. D. Schreiber	TWRS Characterization Support	TY-101 Tank Characterization Plan Engineer
J. W. Osborne	TWRS Tank Vapor Issue Resolution Program	Vapor Issue Resolution Program Manager
H. Babad	TWRS Characterization Program	Tank Safety Screening Scientist
R. S. Viswanath	Special Analytical Studies	Special Analytical Studies Vapor Program Technical Lead
R. D. Mahon	Sampling and Mobile Laboratories	Sampling and Mobile Laboratories Vapor Sampling Program Lead
E. H. Neilsen	Waste Tank Safety Engineering	Vapor Sampling Cognizant Engineer
D. R. Carls	Industrial Hygiene and Safety Program	Industrial Hygiene Point of Contact if Notification Limit is Exceeded (FAX 372-3522)
West Area Shift Operations Manager	Tank Farm Operations	West Tank Farm Point of Contact if Notification Limit is Exceeded (373-3475)

A5.0 EXCEPTIONS, CLARIFICATIONS, AND ASSUMPTIONS

Toxicology Review Panel

The Toxicology Review Panel (TRP) is a group of toxicologists, industrial hygienists, and occupational medicine physicians that convene to review quantitative vapor sample data, identify compounds of toxicological concern, and make recommendations to the WHC Tank Vapor Program Manager regarding potential impacts to worker health and safety.

Toxicological Concern

From a list of 160 analytes found in tank C-103, the TRP identified 19 analytes of toxicological interest. These analytes and others may be identified during TRP review of qualitative GC vapor data as being of toxicological concern if they exceed recommended levels inside the tank headspace. Established guidelines on these analytes are base on Consensus Exposure Standards (CES).

Consensus Exposure Standards

A CES is generally defined as the most stringent of known regulatory or recommended toxicological values for the occupational setting including the threshold limit value (TLV), permissible exposure limit (PEL), recommended exposure limit (REL), and biological exposure limit (BEL). For those constituents with unknown toxicological values, the TRP will be responsible for development of a CES.

Trip Blanks and Field Blanks

Trip Blanks are sampling devices prepared and handled in the same manner as samples, except that they are never opened in the field. Field Blanks are sampling devices prepared and handled in the same manner as the samples, but no tank gases are drawn through them. Laboratories supplying blanks may opt to analyze only one trip blank unless it is determined to be contaminated, in which case all trip blanks are to be analyzed.

Sample Custodian

The sample custodian is the designated SML cognizant scientist or assisting scientific technician, lead sampler, or laboratory scientist or technician who signs the *received by* block on the chain-of-custody. Transfer of custodianship occurs when the custodian signs the *relinquished by* block on the chain-of-custody and releases the sample(s) to the new custodian signator.

Physical Control

Physical control of a sample includes being in the sight of the custodian, in a room which shall signal an alarm when entered, or locked in a cabinet.

A6.0 DELIVERABLES

The Pacific Northwest Laboratory, Oak Ridge National Laboratory, and Sampling and Mobile Laboratories VSS sampling and analyses of tank TY-101 vapors shall be reported as Format VI (Section A6.3). In addition, the analytical laboratories shall receive Format II reports from Sampling and Mobile Laboratories as described in Section A6.2. Any analyte exceeding the notification limit prescribed in Table A-4 shall be reported as Format I (Section A6.1). Other organic species detected at levels deemed sufficient by the TRP to be of potential toxicological concern shall also be reported following Format I. Additional information regarding reporting formats is given in Schreiber (1994a, 1994b, 1994c).

A6.1 FORMAT I REPORTING

Table A-4 contains the notification limits for specific analytes. Analytes that exceed notification limits defined in the DQO processes shall be reported by the Project Manager, delegate, or Health Physics Management by calling the West Area Shift Manager of Tank Farm Operations at 373-3475 immediately. This verbal communication must be followed within 3 working days by written communication to the Tank Vapor Issue Resolution Program, the Industrial Hygiene and Safety Program, and the Characterization Program, documenting the observation(s). A further review of the data, including quality control results and additional analyses for verification of the exceeded analyte, may be contracted between the performing laboratory and the contacts above.

A6.2 FORMAT II REPORTING

Results of the 222-S Laboratory's radiological survey shall be reported by Sampling and Mobile Laboratories as Format II to the vapor analytical laboratories listing the picocuries per sample (pCi/sample) for each sample submitted for analysis. This Format II report should also provide the sample collection sequence and volumes, verification of trip and field blank use, and any anomalous sampling conditions to accompany, if possible, the shipment of samples. Alternatively, this sampling report may be transmitted by FAX to the analytical laboratories within 48 hours after the samples have been shipped.

A6.3 FORMAT VI REPORTING

All Format VI reports shall be delivered to the Tank Vapor Safety Resolution Program, R. S. Viswaneth of Special Analytical Studies, the Characterization Program Office, Analytical Services, and the Tank Characterization Resource Center.

Each analytical laboratory and SML shall deliver three reports. Sampling and analytical data are requested within 5 weeks after receipt of both the samples and supporting data and shall consist of, at a minimum, data tables reporting sample collection data, industrial hygiene tank monitoring data, and radiation screening results obtained by SML, or the results of each analysis performed by the analytical laboratories. A final report shall be delivered within a nine week period after receipt of both the samples and supporting data. A cleared final report shall be delivered after it has completed the proper clearance. Final reports shall be submitted to clearance in parallel to being submitted to the WHC customers identified above.

The final sampling report from Sampling and Mobile Laboratories shall be a WHC supporting document, with sponsor-limited release. It should include:

- 1) a description of sampling equipment used;
- 2) a description of sampling quality controls applied (e.g., leak and cleanliness tests of the sampling manifold, system temperature and pressure monitoring/alarms, instrument calibration details);
- 3) sampling event chronology and sample collection schedule (complete list of samples, by ID#, time collected, flow rates, etc.);
- 4) any industrial hygiene tank monitoring data collected before or during sampling event;
- 5) an evaluation of sources of sampling errors;

- 6) sample radiation screening results;
- 7) sample storage and shipment details; and
- 8) copies of all chain-of-custody forms.

The cleared final report from the analytical laboratories shall be acceptable for distribution to the public. To the extent possible, the final reports should include:

- 1) A summary of analytical results;
- 2) a description of sample device preparation (and manufacture if appropriate), citing procedures and logbooks used;
- 3) references providing traceability of sample device cleanliness;
- 4) a brief description of analytical methods, with procedures cited;
- 5) a brief explanation of how analytical systems control was demonstrably maintained;
- 6) a brief description of sample storage and shipment conditions, citing procedures and logbooks used;
- 7) a listing of analytes of quantitation (target analytes), with analytical method detection limit, range for which instrumentation is calibrated, number of calibration points used, and statistical data on linearity of calibration;
- 8) quantitative analytical results, expressed as dimensionless (ppmv or ppbv) concentration, and mass concentration ($\mu\text{g}/\text{m}^3$, mg/L, etc., calculated at 0 °C and 1 atm) of target analytes (identified by name and Chemical Abstract Service number) in each tank air sample;
- 9) tentative identification and semi-quantitative analytical results, expressed in both mass and dimensionless concentrations (if possible) of non-target organic analytes (identified by name and Chemical Abstract Service number) in each organic vapor sample;
- 10) a statistical summary (i.e., mean, standard deviation) for multiple analyses and/or multiple samples for all analytes (positively and tentatively identified compounds) in both mass and dimensionless concentrations (if possible);
- 11) a summary of all exceptional conditions, such as deviations from procedure or protocol, results obtained outside of instrument calibration range, sorbent trap breakthrough of analytes, or poor surrogate recoveries; and
- 12) copies of all chain-of-custody forms.

A7.0 CHANGE CONTROL

Under certain circumstances, it may become necessary for the performing laboratory to make decisions concerning a sample without review of the data by the customer or the Characterization Program. These changes shall be brought to the attention of the project manager and the Characterization Program as quickly as possible and documented accordingly. Changes must be justified in their documentation and follow the protocols defined in the Quality Assurance Manual, WHC-CM-4-2, Section QR 3.0, Design Control and in Standard Engineering Practices, WHC-CM-6-2, Section EP-2.2, Engineering Document Change Control Requirements. All changes shall also be clearly documented in the final data package.

Additional analysis of sample material from this vapor space characterization project at the request of the Characterization Program shall be performed according to a revision of this Tank Characterization Plan.

A8.0 REFERENCES

Barnes, B. O., 1995, *Quality Assurance Plan for PNL TWRS Tank Vapor Program*, MCS-046 Rev. 0, Pacific Northwest Laboratory, Richland, Washington.

Bellus, T. H., 1993, *Configuration of Hewlett Packard (HP) 5890 Series II Gas Chromatograph (GC) for DML1*, (internal memo 12240-SAA93-039 to L. L. Lockrem, July 10), Westinghouse Hanford Company, Richland, Washington.

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Osborne, J. W., J. L. Huckaby, E. R. Hewitt, C. M. Anderson, D. D. Mahlum, B. A. Pulsipher, J. Y. Young, 1994, *Data Quality Objectives for Generic In-Tank Health and Safety Vapor Issue Resolution*, WHC-SD-WM-DQO-002, Rev. 0, Westinghouse Hanford Company, Richland, Washington.

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Schreiber, R. D., 1994a, *Format I Reporting Requirement*, (internal memo 7E720-94-121 to J. G. Kristofzski, August 15), Westinghouse Hanford Company, Richland, Washington.

Schreiber, R. D., 1994b, *Revised Interim Tank Characterization Plan Guidance*, (letter 7E720-94-121 to C. S. Haller, May 13), Westinghouse Hanford Company, Richland, Washington.

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United States Department of Energy Order 5700.6C, of 08-21-91, *Quality Assurance*.

United States Code of Federal Regulations, 10 CFR, Part 830, *Nuclear Safety Management*; Section 120, *Quality Assurance Requirements*.



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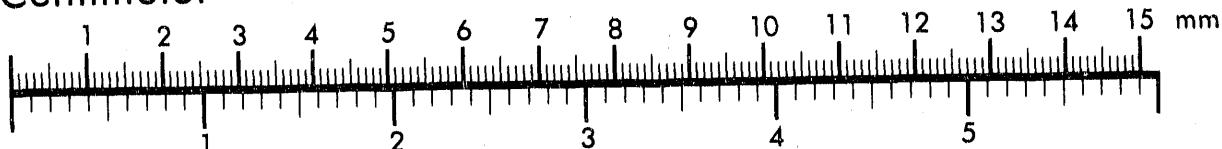
Association for Information and Image Management

1100 Wayne Avenue, Suite 1100

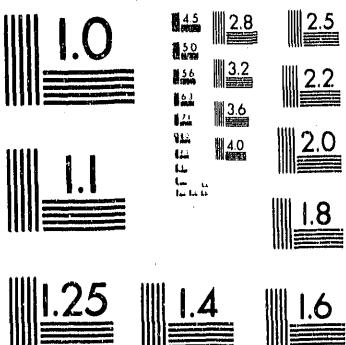
Silver Spring, Maryland 20910

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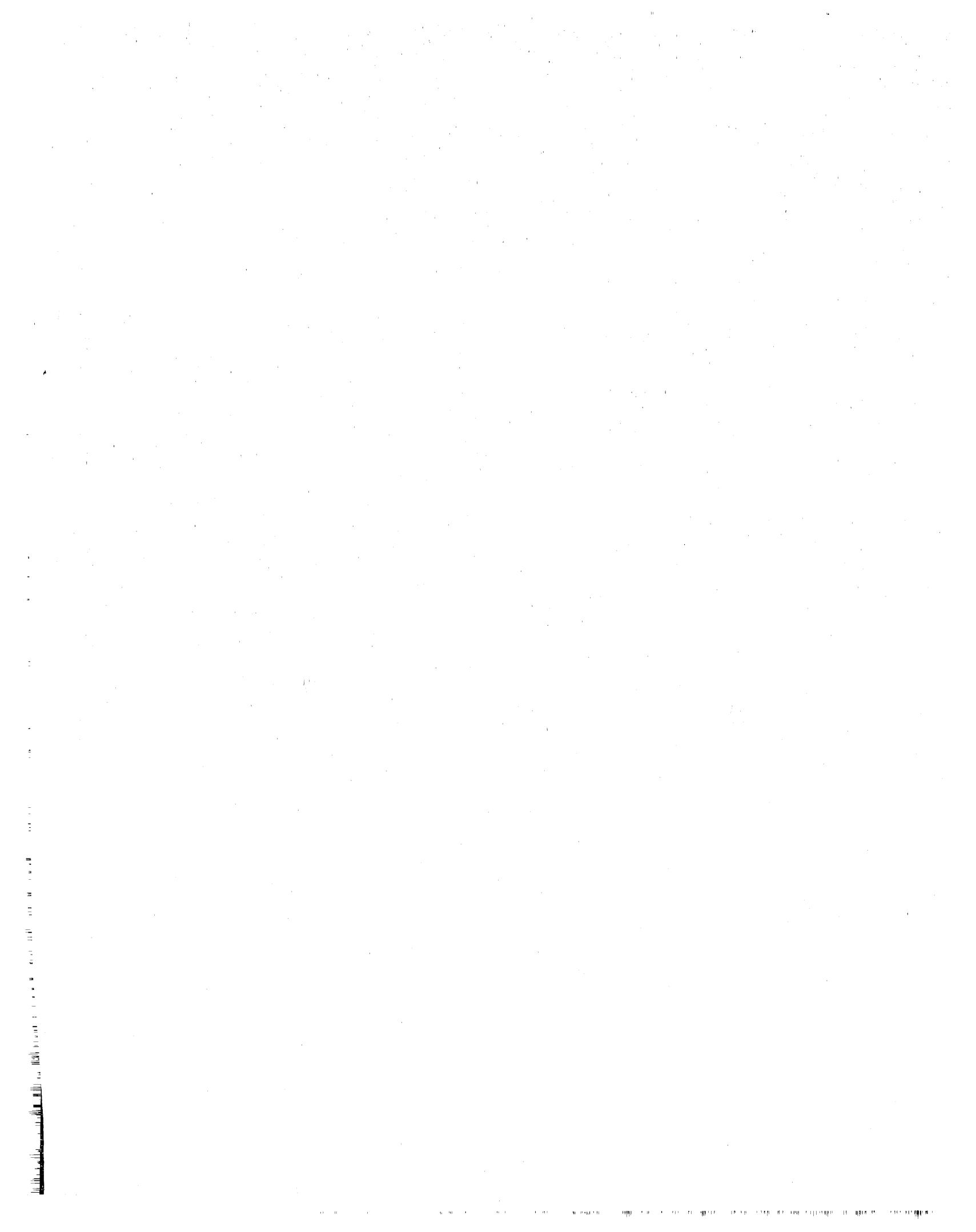
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