



**Sonny Goldston/WSRC/Srs**

07/14/2008 10:10 AM

To Robert Petras/WSRC/Srs@srs

cc

bcc

Subject Fw: WIR Citation: Tank 30 Demister

This should be all you need to go ahead with LLW disposal. Let me know if you have questions or comments.

thanks

Sonny

Sonny Goldston

Office: 803-557-6314

Cell : 803-507-1310

Pager 803-725 7243 #11659

----- Forwarded by Sonny Goldston/WSRC/Srs on 07/14/2008 10:09 AM -----



**Howard Pope/DOE/Srs**

07/14/2008 09:41 AM

To Sonny Goldston/WSRC/Srs@Srs, Robert

Petras/WSRC/Srs@srs

cc howard.pope@srs.gov

Subject Fw: WIR Citation: Tank 30 Demister

The long awaited ok.

Howard L. Pope  
Senior LLW Program Manager  
Programs Division  
803-208-6218  
Pager 803-725-7243, 14130

----- Forwarded by Howard Pope/DOE/Srs on 07/14/2008 09:41 AM -----

**L Ling/DOE/Srs**

07/14/2008 09:35 AM

To Howard Pope/DOE/Srs

cc

Subject Re: Fw: WIR Citation: Tank 30 Demister 

Howard:

I have no problems with the Citation below.

Larry  
Howard Pope/DOE/Srs



**Howard Pope/DOE/Srs**

07/07/2008 08:15 AM

To L Ling/DOE/Srs@Srs



cc

Subject Fw: WIR Citation: Tank 30 Demister

Howard L. Pope  
Senior LLW Program Manager  
Programs Division  
803-208-6218  
Pager 803-725-7243, 14130


----- Forwarded by Howard Pope/DOE/Srs on 07/07/2008 08:15 AM -----

**Robert Petras/WSRC/Srs**

05/12/2008 02:11 PM

To Sonny Goldston/WSRC/Srs@Srs

cc Howard Pope/DOE/Srs@srs, L Ling/DOE/Srs@srs, Thomas  
England/WSRC/Srs@srs

Subject Re: WIR Citation: Tank 30 Demister 

Howard,

Until I can round up a drawing of a Type III tank configuration, I printed this figure showing the components from a Tank Farm operator training manual. Please note that it is not to scale.



Type III Tank Purge Ventilation System.pdf

Thanks

Bob Petras  
208-1410/15400

Sonny Goldston/WSRC/Srs




**Sonny Goldston/WSRC/Srs**

05/12/2008 12:14 PM

To Howard Pope/DOE/Srs@Srs

cc L Ling/DOE/Srs@Srs, Robert Petras/WSRC/Srs@Srs,  
Thomas England/WSRC/Srs@Srs

Subject Re: WIR Citation: Tank 30 Demister 

Bob,

Can we put together a sketch or drawing that shows how the [ventilation system components](#) fit together and the location? Howard will be able to look at this on Thursday as I understand it, so if you were able to get a drawing to him by then we may be good to go.

thanks

Sonny Goldston

Office: 803-557-6314  
Cell : 803-507-1310  
Pager 803-725 7243 #11659  
Howard Pope/DOE/Srs



**Howard Pope/DOE/Srs**

05/12/2008 12:08 PM

To Sonny Goldston/WSRC/Srs@Srs, L Ling/DOE/Srs@Srs  
cc Robert Petras/WSRC/Srs@Srs, Thomas  
England/WSRC/Srs@Srs  
Subject Re: WIR Citation: Tank 30 Demister 

I have reviewed your e-mail and I think you are ok in your determination. However - there is always a however. However, I would like to see some drawings that show the demister in a ventilation system. I get nervous when you call it a Tank demister.


Larry, do you have any problem with this determination?

Howard L. Pope  
Senior LLW Program Manager  
Programs Division  
803-208-6218  
Pager 803-725-7243, 14130  
Sonny Goldston/WSRC/Srs



**Sonny Goldston/WSRC/Srs**

04/29/2008 01:49 PM

To Howard Pope/DOE/Srs@Srs  
cc Thomas England/WSRC/Srs@Srs, Robert  
Petras/WSRC/Srs@srs  
Subject WIR Citation: Tank 30 Demister 

Howard,

As we discussed last week, below is our draft writeup discussion of the Tank 30 Demister to show that it is included in the WIR Citation document, [Citation Determination and Evaluation of Waste Incidental to Reprocessing, HLW-SUP-99-0060](#). Please take a look at this and let us know if you would like to meet to discuss or if you can agree with our proposed position without a meeting.

We can meet on May 12 or 13, 2008 (Monday or Tuesday).

Sonny Goldston

Office: 803-557-6314  
Cell : 803-507-1310  
Pager 803-725 7243 #11659

Howard,

I have been asked to provide Citation guidance on the removal of the Tank 30 purge ventilation demister and am requesting your concurrence.

When DOE Order 435.1, Radioactive Waste Management was implemented on July 9, 2000 there was an implementing document written/approved by WSRC and concurred with by DOE SR. Since the implementation of this document, *Citation Determination and Evaluation of Waste Incidental to Reprocessing*, HLW-SUP-99-0060, any questions that arise pertaining to specific objects and whether or not they are intended to be included in the Citation Determination listing of materials in Attachment 4, Citation Determination For Waste Incidental To Reprocessing are forwarded to me for review and guidance.

I reviewed the purge ventilation demister equipment to determine if it meets DOE Order 435.1 Citation Determination requirements. Based on this review, the demister equipment meets Citation requirements and can be managed as LLW or TRU waste without completing a WIR Evaluation or equivalent as long as the equipment has been used as designed. This review would cover the Tank 30 purge ventilation demister as well as any other tank purge ventilation demisters.

My reasoning for this review is that:

Attachment 4, Citation Determination For Waste Incidental To Reprocessing, to *Citation Determination and Evaluation of Waste Incidental to Reprocessing*, HLW-SUP-99-0060 lists items that have been evaluated to meet Citation requirements of DOE Order 435.1 Radioactive Waste Management. These items are considered non-HLW (high-level waste) and can be managed as low-level waste (LLW) or transuranic waste (TRU). These items do not require further evaluation to determine if they are HLW.

Attachment 4, Citation Determination For Waste Incidental To Reprocessing, to *Citation Determination and Evaluation of Waste Incidental to Reprocessing*, HLW-SUP-99-0060 page 18 of 24 under the heading "Remote Handling Devices and Processing Support Equipment lists items that have been evaluated to meet Citation requirements of DOE Order 435.1 Radioactive Waste Management. It specifically identifies "Motors, blowers, fans, and ventilation system components, dampers and duct work". A demister is a ventilation system component installed between the condenser and reheater on a tank purge ventilation system. Demisters are comparable to HEPA filters since they are installed in the same flow path and have comparable or less radioactivity.

As Sonny Goldston discussed with you last week, we would like to gain your agreement with this position. If you would like to discuss, we can arrange to meet with you or, if you feel comfortable, you could provide your agreement in a reply to this email.

Bob Petras

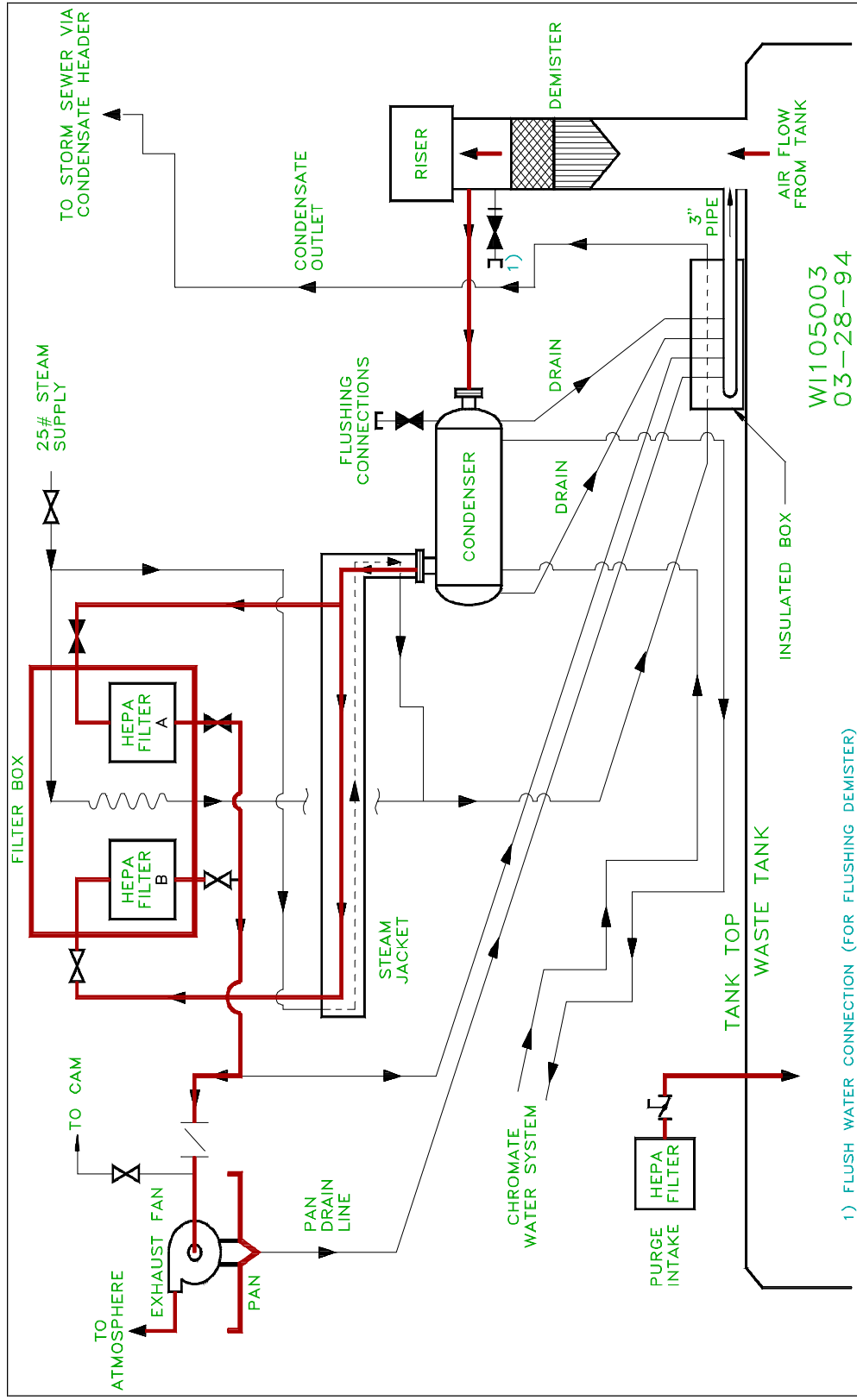


Figure 7 Type III Tank Purge Ventilation System