

William P. Swan

VISTA

To

~~Case~~

Date 7/8/85

CONSENT DECREE

- ① All letters for "proof" of administrative measures for compliance plan.
- ② Get letters drafted if necessary.
- ③ Get more definite on administrative measures.

CCR 000021139

RAC/PCN ~~FILE~~

① ~~Demonstrate~~ have some forththought

① Dates for annual relief valve release avoidance training ✓

② What is future for liquid-full systems training? Do we continue it or not? —

③ Do we have documentation to support SP monitoring across caustic dryers. —

④ Get copy of updated inspection schedule for PM.

⑤ Future administrative programs

— Training → RV release prevention
— VNF memos. Bypass prevention

⑥ Get copy of JCL remarks on MWC bypass mechanism letter for updating.

⑦ Supplement document of cause v.s. cure

Administrative measures to be
taken for Compliance plan

- ① More formalized communications procedures for venting.
→ * Need ~~to~~ a letter to support
- ② Operating philosophy for emergency venting to be developed.
Need a letter to support
- ③ Need formalized training (periodically)
 - Annual training on bypasses
 - Bring up bypasses in safety-type meetings
- ④ Much more rigid reporting procedures have been instituted New form
- ⑤ - Memos to Ethylene Plant have been drafted - to prevent R201 upsets due to poor ethylene quality.
- ⑥ Control vent valve on H207 has been installed.
- ⑦ More rigorous PM program for instruments, etc. to be instituted
* Need a note here Insert

- ⑧ Much more rigorous attention paid
to ~~BL410~~ (Operator logs)
BL412
* Any notes on this?
- ⑨ Alarms put on pressure indicators?
- ⑩ PM on mechanical equip..
- Air blower.
- ⑪ Different valve in flame scanner arrestors
due to pluggage.