

## General Comments

1. *Verify that all dates in this document are correct. Some errors noted on the first page of Enclosure 1 are:*
  - a. *Paragraph 1: The previous version of the Tank Cleaning Verification Plan was submitted on June 20, 2024, not June 13, 2024.*
  - b. *Paragraph 2: The initial Tank Cleaning Verification Plan was submitted on January 12, 2024, not January 10, 2024.*
  - c. *Paragraph 2: The Tank Closure Plan, Supplement 2 was submitted on May 31, 2023, not February 28, 2024. Based on the time difference, was this intended to refer to a different document?*
  - d. *Paragraph 2: The first revised Tank Cleaning Verification Plan was submitted on April 15, 2024, not April 12, 2024.*

**NCTF-RH Response:** Dates have been corrected and reference to the Closure Supplement removed.

2. *We understand a separate plan will be submitted to address cleaning verification for Tanks 1, 13, 14, 17, and 18. The DOH's preference is to apply the same method to all tanks, where feasible. If not feasible, modifications to the established method can be requested for the DOH's consideration and approval.*

**NCTF-RH Response:** The Navy intends to follow this verification plan for all tanks where practicable. Separate plans will be submitted for the inactive tanks that will address any requirement to deviate from the cleanliness verification plan for active tanks.

## Specific Comments

3. *Section 1. Introduction, Enclosure 1, Page 1: Again, the DOH's May 9, 2024 letter did not "propose] to adopt the definition of 'clean' from the Society for Protective Coatings (SSPC) Surface Preparation Standard No. 1 - Solvent Cleaning (SP-1)." This was Comment 2 of our previous comment letter, dated June 6, 2024. The NCTF-RH "acknowledged" the comment in its June 20, 2024 response but did not correct the plan. Correct the plan accordingly.*

**NCTF-RH Response:** Reference to regulatory agency suggestion of the definition of "clean" has been removed.

4. *Tier 3: Quality Validation (QV) by Third-Party Certified Inspector, Enclosure 1, Page 4: States "NCTF-RH will provide documentation demonstrating the qualifications of the [Certified Coatings Inspector Certification] CIP Level 2 and CIP Level 3 inspectors once these individuals have been identified." This should be updated, as the inspectors and their credentials are provided in the addendum that came with this plan (Enclosure 2).*

**NCTF-RH Response:** Concur. Documentation is now included in the appendix of the revised addendum to the Quality Validation Plan, Tank Cleaning Edition (AMPP Inspector Certifications).

5. **Section 3.1. Primary Methods, Enclosure 1, Page 5:** States "The AM PP [Association for Materials Protection and Performance] inspector will rely primarily on in-tank lighting to inspect the tank surface. The inspector will maintain a separate light source for up-close inspection as well as for areas where in-tank lighting is not sufficient. For compatible products, a blacklight (365 nanometer intensity of 4,000 microwatts per square centimeter at 15 inches) may augment inspection to facilitate screening." Page 3 of this plan summarizes why the NCTF-RH ruled out ultra-violet (UV) light as an effective verification method. Explain the following in the revised Plan:
- What "compatible products" refers to. Page 3 states UV was determined ineffective for viewing JP-5.
  - How this "blacklight" is different (in wavelength, etc.) than the "UV-bandpass camera" mentioned on page 3 that was used to determine UV was ineffective.

**NCTF-RH Response:** Clarifying technical information provided on page 3 of this revision to the Tank Cleanliness Validation Plan and Quality Validation Plan, Tank cleaning addendum.

6. *Step 4 - Quality Validation, Enclosure 1, Page 10: Which item or items listed in the QV report will include a shell roll out diagram? The May 13, 2024 version of the Tank Cleaning Verification Plan listed "Shell Roll Out Diagrams showing dates each plate has been washed, rinsed and inspected" and "Shell Roll Out Diagrams showing general locations of photographs and cloth rub tests" as items in the QV reports. These were replaced by "Summary Drawing of Sample Locations" in the July 26, 2024 Tank Cleaning Verification Plan, so it is unclear where the shell roll out diagrams will be included in the QV reports.*

**NCTF-RH Response:** Shell rollout drawings will be used to summarize sample locations and wash/rinse/inspection dates. Revisions made to page 10 of the Tank Cleanliness Validation Plan and page 4 of the Quality Validation Plan, Tank Cleaning Addendum.

7. *Section 6: Sample Size, Enclosure 1, Pages 12-13: This section was not updated to reflect the minimum required confirmation sample frequency of 96 samples per tank, which is discussed in Section 3.1.2. Update Section 6 and the NCTF-RH Quality Validation Plan Addendum (Enclosure 2), which still states "[c]loth rub testing is not set at a frequency, but rather by visual indication of contamination."*

**NCTF-RH Response:** Revisions made to page 13 of the Tank Cleanliness Validation Plan and page 3 of the Quality Validation Plan, Tank cleaning addendum to reflect the updated minimum sampling rate.