



Department of Energy
Richland Operations Office
P.O. Box 550
Richland, Washington 99352

16-AMRP-0226

JUL 27 2016

Ms. Alexandra K. Smith, Program Manager
Nuclear Waste Program
Washington State Department of Ecology
3100 Port of Benton Boulevard
Richland, Washington 99354

Dear Ms. Smith:

INITIATION OF DISPUTE RESOLUTION REGARDING DISAPPROVAL OF THE
200-SW-2 RADIOACTIVE LANDFILLS GROUP OPERABLE UNIT RCRA FACILITY
INVESTIGATION/CORRECTIVE MEASURES STUDY/REMEDIAL INVESTIGATION/
FEASIBILITY STUDY WORK PLAN, DOE/RL-2004-60, REVISION 1

- References: (1) Ecology ltr. to R. J. Corey, RL, from P. E. Eberlein, "Re: 200-SW-2
Radioactive Landfills Group Operable Unit RCRA Facility Investigation/
Corrective Measures Study/Remedial Investigation/Feasibility Study Work
Plan, DOE/RL-2004-60, Revision 1," (16-NWP-116) dtd. June 30, 2016.
- (2) RL ltr. to A. K. Smith, Ecology, and D. A. Faulk, EPA, from R. J. Corey,
"200-SW-2 Radioactive Landfills Group Operable Unit RCRA Facility
Investigation/Corrective Measures Study/Remedial Investigation/Feasibility
Study Work Plan, DOE/RL-2004-60, Revision 1," (16-AMRP-0197) dtd.
June 9, 2016.

The purpose of this letter is for the U.S. Department of Energy Richland Operations Office (RL) to invoke Dispute Resolution pursuant to the primary document review process in Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) Action Plan, Section 9.2.1, regarding the Washington State Department of Ecology's (Ecology) June 30, 2016, disapproval of the subject Work Plan.

On June 9, 2016, RL submitted the Work Plan to Ecology for approval, Reference (2). On June 30, 2016, RL received Ecology's letter 16-NWP-116, Reference (1) containing two modifications for incorporation into the Work Plan within 30 days, per the Tri-Party Agreement. The two disputed issues pertain to the following:

1. Exposure point calculation process, using ProUCL v5.1, supporting basis for action decisions, and
2. Conditional point of compliance considered during the feasibility study project phase supporting the remedy selection decisions.

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RL looks forward to working with Ecology to informally resolve this dispute within 30 days. To integrate this language within similar work plans for the Central Plateau and given that the U.S. Environmental Protection Agency's (EPA) approval is required on the Sampling and Analysis Plan in Appendix A of the Work Plan, it is suggested that the EPA be included in the discussions of these issues during the dispute resolution process.

If you have any questions, please contact me, or your staff may contact Mike Cline of my staff, at (509) 376-6070.

Sincerely,



Ray J. Corey, Assistant Manager
for the River and Plateau

AMRP:BWV

cc: D. Bartus, EPA
G. Bohnee, NPT
J. V. Borghese, CHPRC
R. Buck, Wanapum
R. E. Day, CHPRC
M. H. Doornbos, CHPRC
P. E. Eberlein, Ecology
D. A. Faulk, EPA
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J. B. Price, Ecology
D. Rowland, YN
R. Skeen, CTUIR
E. R. Skinnarland, Ecology
M. J. Turner, MSA
Administrative Record (200-SW-2)
Environmental Portal