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15-TF-0058

JUN 23 2015

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Ms. Hedges:

PLANNING FOR WASTE MANAGEMENT AREA A-AX RETRIEVAL AND CLOSURE

Reference Ecology letter from J. Lyon to R.E. Beach, ORP, "Planning for Waste Management Area (WMA) A-AX Retrieval and Closure," 15-NWP-081, dated May 4, 2015.

Thank you for your letter confirming the Washington State Department of Ecology's (Ecology) support for the characterization and closure of the Resource Conservation and Recovery Act (RCRA) Treatment, Storage and Disposal Facility Unit, Waste Management Area (WMA) A-AX (Reference).

Ecology's letter requested the prompt completion of the Data Quality Objectives (DQO) process for WMA A-AX that started in 2011 in order to develop a RCRA Facility Investigation (RFI) and Corrective Measures Study (CMS) work plan for the contaminated soils, as required by Section 2.3 of *Hanford Federal Facility Agreement and Consent Order* (HFFACO) Appendix I. The U.S. Department of Energy, Office of River Protection (ORP) will meet with you to discuss the timing for completing that process. Currently, some preliminary soil investigation is underway to provide additional input to that planning process. ORP suggests that the formal DQO process begin when the results of the ongoing preliminary investigation are available.

Ecology's letter encouraged ORP to use the DQO process to characterize in-tank waste and contaminated media (ex-tank waste) together. However, the current path forward is to separate the characterization of in-tank waste and contaminated media. ORP prefers to separate the DQO and work plan for the RFI/CMS from the DQO and Tank Sampling and Analysis Plans (TSAP) for tank waste residuals because, although the constituents of concern are likely similar, the characterization methods and approaches will be vastly different. In addition, specific components may require an individual DQO process, due to their process history and configuration (e.g., RPP-49049, *Data Quality Objectives for Waste Transfer and Component Closure of the CR Vault Tanks* and RPP-45634, *Data Quality Objectives for Tank 241-C-301 Waste Transfer and Component Closure*).

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Furthermore, a DQO process has already been performed with Ecology's participation for characterization of in-tank waste. This process resulted in the development of RPP-23403, *Single-Shell Tank Component Closure Data Quality Objectives*. This document supports the residual waste characterization required for the Retrieval Data Report (RDR), as described in Section 2.1.7 of HFFACO Appendix I. The RDR is a necessary tool for developing the closure plans described in HFFACO Appendix I, Section 2.2. ORP suggests collaborating with Ecology on a revision to RPP-23403 to support the pre-closure characterization of residual waste in WMA A-AX tanks. The TSAPs developed from this DQO will be subject to Ecology's review and approval.

Ecology's letter noted an expectation regarding characterization of waste in tanks to expedite preparation of acceptable Tank Waste Retrieval Work Plans. As you know, the A-AX tanks are covered by the Consent Decree which does not require pre-retrieval sampling and analysis of waste in individual tanks (also not required by the HFFACO). The current body of knowledge compiled in the Best Basis Inventory is sufficient to plan retrieval actions and to develop Tank Waste Retrieval Work Plans. If specific additional information is required to finalize retrieval planning, a tank-specific DQO process will be needed, and ORP will collaborate with Ecology in that process.

Ecology's stated expectations for characterization of all media contaminated by releases from tanks and activities in WMA A-AX are consistent with expectations for developing the WMA A-AX RFI/CMS DQO and work plan, per Section 2.3 of HFFACO Appendix I. Ecology's stated expectation that DQOs support the development of acceptable closure plan(s) will be met through the collaborative modification of RPP-23403, *Single-Shell Tank Component Closure Data Quality Objectives*, as well as the collaborative development of any additional component-specific DQOs and associated work plans or sample analysis plans. An expected outcome of this process will be the gathering of additional data to better inform the future updates to a Performance Assessment that will address all sources of contamination in WMA A-AX.

Ecology requested a process to participate and provide input when opportunities arise to capture additional characterization information. As you know, regular meetings already occur among Ecology, ORP, and Washington River Protection Solutions LLC that are used to share emerging information and identify such opportunities; we do not feel that additional meetings are necessary.

Ecology specifically requested that ORP take the opportunity to inspect and sample piping that is being removed in A-AX tank farm as part of the ventilation system upgrade. Visual inspection of the piping will be performed, and photographs taken. In addition, a section of piping will be stored for potential future sampling and analysis. The scope and purpose of the future sampling and analysis will be discussed with Ecology.

ORP is currently performing preliminary soil investigation in WMA A-AX, as described in RPP-PLAN-57332, *Field Sampling and Analysis Plan for Soil Samples at Waste Management Area A-AX*. Ecology identified three specific items of concern regarding soil contamination in WMA A-AX.

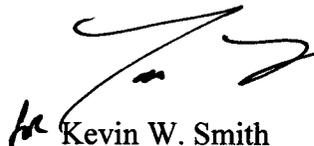
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Item 1 - Ecology requested that ORP re-log the laterals beneath A Farm tanks as well as conduct temperature logging of drywells in A Farm. Temperature logging of drywells in A Farm is currently underway. Re-logging the laterals will have to be planned to coordinate with retrieval activities. The need for re-logging laterals should be discussed in the WMA A-AX RFI/CMS DQO process.

Items 2 and 3 - Ecology identified additional information that should be included in RPP-PLAN-57332. This document is currently being revised to incorporate the additional background information, and Ecology's participation in the update process is requested. The body of historic information as well as the preliminary information currently being obtained will serve as the basis for developing the WMA A-AX RFI/CMS DQO process.

Ecology requested a meeting with ORP to discuss scheduling and completion of these plans and documents. The initial meeting will be scheduled in June 2015.

If you have any questions, please contact Thomas W. Fletcher, Assistant Manager for Tank Farms Project, on (509) 376-3434.


Kevin W. Smith
Manager

TF:REB

cc:

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