



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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August 27, 2013

13-NWP-091

Mr. Oliver A. Farabee, Federal Project Director
Milestone M-91-00 Project Manager
United States Department of Energy
Richland Operations Office
P.O. Box 550, MSIN: A5-11
Richland, Washington 99352

Re: M-91 Transuranic Mixed/Mixed Low-Level Waste Project Management Plan, Revision 12,
June 2013

Dear Mr. Farabee:

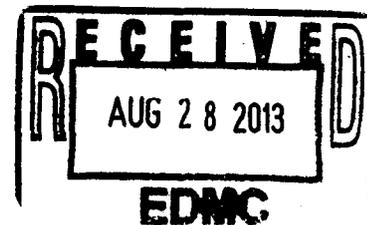
The Department of Ecology received the 2012 M-91 Transuranic Mixed/Mixed Low-Level Waste Project Management Plan (PMP) dated June 2013. We transmitted a request by email to Mr. Mike Collins on July 25, 2013 to extend our deadline for review until August 30, 2013. We submitted a letter with our comments on August 12, 2013.

However, there seems to be some confusion about the meaning of our letter with comments. This confusion was voiced during the Project Manager Meeting (PMM) on August 22, 2013. Let me explain our expectation.

Ecology found that the PMP document did not meet the criteria in TPA Action Plan Section 11.5 (pages 11-3 and 11-4). The document is therefore incomplete and not finalized. The process for resolving comments on a primary document such as this is clearly outlined in Figure 9-1 on page 9-4 in the Tri-Party Agreement. All the outlined pathways in this figure for responding to comments assume the creation of a final document, and that the document meets the criteria in the TPA Action Plan, mentioned above.

Ecology agreed to rolling over the comments from the 2011 PMP to the 2012 PMP document, but Ecology did not thereby agree to permanently change the process outlined in Figure 9-1. Contrary to what was argued during the PMM meeting, precedence regarding the process plays no role whatsoever.

Ecology expects that we follow the process agreed on in the TPA. We expect responses to all the comments, agreements reached on how to update the document, and the final document produced within the timeframe outlined in Figure 9-1 of the TPA. This document can then serve as a template for future documents in the series of deliverables under Milestone M-91-03.



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We look forward to working with USDOE to resolve all of our concerns with this document prior to finalization.

If you have any questions, please feel free to contact me at DeborahSingleton@ecy.wa.gov or 509-372-7923.

Sincerely,



Deborah Singleton
Waste Management Project Manager
Nuclear Waste Program

ee:jvs

cc: Dennis Faulk, EPA
Larry Romine, USDOE
Mike Collins, USDOE
Robert Piippo, MSA
Stuart Harris, CTUIR
Gabriel Bohnee, NPT
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