

START



9513333.2493

0040326

STATE OF WASHINGTON

DEPARTMENT OF ECOLOGY

Mail Stop PV-11 • Olympia, Washington 98504-8711 • (206) 459-6000

August 22, 1994

Mr. Steve Wisness
Hanford Project Manager
U.S. Department of Energy
P.O. Box 550
Richland, WA 99352



Dear Mr. Wisness:

Re: Fast Flux Test Facility Negotiations

This past Thursday, August 18, the U.S. Department of Energy (USDOE), U.S. Environmental Protection Agency (USEPA), and Ecology representatives participated in a negotiation session focusing on the current revision of the Fast Flux Test Facility (FFTF) change request. During this session I committed to provide written copy of a number of my outstanding concerns and asked that USDOE provide replies prior to our next session. I would appreciate you forwarding the following concerns to Patrick Willison, Paul Krupin, and appropriate FFTF staff:

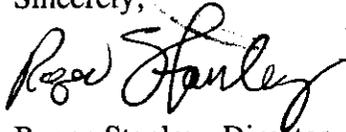
1. For readability I suggest that USDOE arrange and format FFTF (and other) transition change requests by major activity grouping. Please see our agreed on draft N Area Pilot Project change request as an example.
2. Please provide a description of FFTF ("RCRA") closure activities which will be required now and in the future, i.e., what systems/units will require closure?
3. Is USDOE developing change request "trigger language" in order to identify criteria to be used in defining the extent of an appropriate surveillance and maintenance period prior to initiation of Decontamination and Decommissioning (D&D)?
4. Why has USDOE (unilaterally) assumed that expected sodium residuals (4000 GAL) will not be subject to Washington Hazardous Waste Management Act (HWMA) requirements?
5. Please describe: 1) The extent to which water rights are currently reserved for FFTF and other (now shutdown) production facilities; 2) projected water usage during transition, surveillance and maintenance, and D&D; and 3) USDOE plans for appropriate decreases in volumes reserved.

Mr. Steve Wisness
Page 2
August 22, 1994

6. On what basis has USDOE (unilaterally) assumed that permitting under the HWMA will not be required prior to construction of the planned sodium storage facility and sodium reaction facility?
7. What FETE facilities/systems exist (or will exist) where sodium is (or will) no longer be used as a coolant, e.g., the IEM cell?
8. Please identify any end point criteria which will pertain to facilities/systems regulated under the HWMA.

Thank you very much for your attention in this matter.

Sincerely,



Roger Stanley, Director
Tri-Party Agreement Implementation

RS:jw

cc: Larry Arnold, WHC
Doug Sherwood, EPA-RL
Tanya Barnett, AG's Office
Administrative Record