



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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March 15, 1996

Ms. Maureen Hunemuller
U. S. Department of Energy
Office of Environmental Safety and Health
Technical Support
12800 Middlebrook Road, MS: ER-8.1
Germantown, MD 20874



Mr. Jackson Kinzer
U. S. Department of Energy
P. O. Box 550, MSIN: S7-50
Richland, WA 99350

Dear Ms. Hunemuller and Mr. Kinzer:

Re: Double-Shell Tank System Integrity Assessment (Milestone M-32-04)

It has come to our attention the U.S. Department of Energy (USDOE) Headquarters will not be funding the Tank Structural Integrity Panel (TSIP) after FY96. In fulfillment of Milestone M-32-04-T04, USDOE submitted document WHC-SD-WM-AP-017, Rev. 1, outlining a schedule to complete the Double-Shell Tank (DST) Integrity Assessments by the end of June 1999. The schedule provided for ultrasonic testing (UT) of only six DSTs. The Washington State Department of Ecology (Ecology) accepted the integrity assessment schedule based on USDOE commitment to fund the Tank Structural Integrity Panel (TSIP) providing guidance in selecting the appropriate sub-set of tanks to be UT tested and evaluating the results. These concessions were based on Ecology's confidence in the expertise and objectivity of the TSIP to evaluate the UT results from the six tanks and make recommendations for additional testing requirements. If funding for the TSIP to review UT results is not continued throughout the completion of the DST Integrity Assessment Program, USDOE will force Ecology into the position of requiring ultrasonic testing of all 28 double-shell tanks as opposed to the current innovative regulatory approach. If the requirements of Milestone M-32-04-T04 and therefore, Milestone M-32-04 are not met, Ecology will take appropriate action. 37607

Integrity assessments of the DST system is an essential element of the DST RCRA Part B permit (WAC 173-303-806(4)(c)(i), and WAC 173-303-640(2)). Failure to complete the required integrity assessments will result in a delay and/or denial of the DST RCRA Permit and could

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have significant impacts on the current privatization efforts. It is not clear to Ecology if adequate funding exists to complete the currently agreed to integrity assessments.

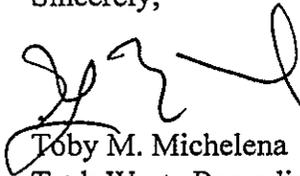
Ramifications of not funding the TSIP and/or providing adequate funding for completion of the Integrity Assessment Program include:

- 1) USDOE may not be able to complete the required integrity assessments of all 28 tanks by the target date of 1999;
- 2) Ecology will be forced to take the position that Milestone M-32-04-T04 and Milestone M-32-04 have not been satisfied; and
- 3) Incomplete integrity assessments will result in a delay or denial of the final facility permit due in 1999 which may have serious impacts on the current privatization efforts.

Accurately assessing the condition of the double-shell tanks is extremely important, not only to Ecology, but to all stakeholders, when waste continues to be stored in aging tank systems. As you are aware, Ecology, at the request of USDOE and with support from the Hanford Advisory Board, signed a change request which canceled the construction of new double shell tanks. USDOE based its decision to cancel the new tanks on the assumed integrity of the DSTs. This widely applauded cost efficiency will be put in jeopardy without the timely completion of the DST Integrity Assessments.

USDOE must make a commitment to fund the TSIP either through Headquarters or the Richland office. In addition, USDOE must provide adequate funding to complete the DST Integrity Assessment Program. Please respond directly to me at your earliest convenience, regarding these concerns. I can be reached at (360) 407-7144.

Sincerely,



Toby M. Michelena
Tank Waste Remediation System Project Manager
Nuclear Waste Program

LC:TM:sl

cc: Cliff Clark, USDOE Casey Ruud, USDOE
Dale Jackson, USDOE Kamal Bandyopadhyay, BNL
Jim Rasmussen, USDOE Administrative Record: M-32-04-T04