



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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May 9, 1996

Mr. James McClusky, Director
Waste Storage Division
U.S. Department of Energy Richland Operations Office
P.O. Box 550
Richland, WA 99352



Dear Mr. McClusky:

Re: Definition of Characterized Tank for Milestone M-44 Usage

The Washington State Department of Ecology (Ecology) recently attended a Tank Waste Remediation System (TWRS) Environmental Impact Statement (EIS) public hearing during which a member of the public asked about the status of characterized tanks. During the meeting, a U.S. Department of Energy (USDOE) representative stated 60% of the 177 high-level waste tanks have been sampled. Based upon this response, Ecology feels the provision of its interpretation and/or definition of a characterized tank is hereby appropriate.

It is Ecology's position that a TWRS system tank is characterized when all applicable and agreed upon data quality objectives (DQOs) have been satisfied. As the DQOs are a realization of the entire TWRS' programmatic characterization (i.e., sampling and evaluation) needs, no tank is characterized until all applicable DQO objectives are met, regardless of whether or not a tank characterization report (TCR) has been submitted for that tank. For informational purposes, it should be noted that to-date, Ecology has accepted only five TCRs as satisfying Milestone M-44 requirements. Ecology has been present at meetings where USDOE has stated that currently 15 tanks have been determined to have satisfied all DQO requirements. This information has not been formally presented to Ecology and, given the poor quality of the DQOs currently in use, Ecology questions whether this evaluation is appropriate.

As such, Ecology interprets any characterization sampling activities which occur in the SST and/or DST systems to be within the scope of Milestone M-44. Similarly, Ecology interprets any characterization evaluation of SST and/or DST system(s) data/information to be within the scope of Milestone M-44. For clarification purposes, please refer to Federal Facility Agreement and Consent Order Change Control Form number M-44-93-01 dated January 25, 1994, which states:

34129

Mr. James McClusky

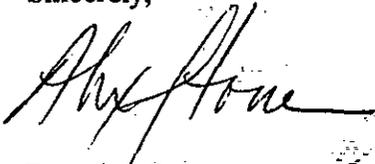
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- Characterization of DST and SST waste phases (solids, liquids, gases) is covered as specified through the Data Quality Objective (DQO) process.
- Characterization is designed to support retrieval of all tank waste . . .

If you or your staff have any questions on this topic, please call me at (509) 736-3018.

Sincerely,



Dr. Alex Stone
Characterization Project Manager
Nuclear Waste Program

AS:mf

cc: Jackson Kinzer, USDOE
Jon Peschong, USDOE
Chris Bader, USDOE
James Thompson, USDOE
Donald Vieth, USDOE
Doug Sherwood, EPA
Roger Bacon, WHC
Susan Eberlein, WHC
Hanford Advisory Board
Administrative Record, M-44
TWRS EIS Administrative Record, Jacobs Engineering