



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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June 28, 1996

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



Dear Mr. McClusky:

Re: Review of Fiscal Year 1997 Tank Waste Analysis Program as required by Milestone M-44

The Washington State Department of Ecology (Ecology) has completed its review of the *Draft Fiscal Year 1997 Tank Waste Analysis Plan* (WHC-SD-WM-PLN-120, Rev. A) submitted by the U.S. Department of Energy (USDOE) to fulfill the Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement or TPA) Milestone M-44-01. In addition to the fatal flaw outlined in Ecology's letter of June 4, 1996, Ecology has two additional, substantive comments. Those comments are attached. 44453

Therefore, Ecology finds this document to be seriously deficient and substantive changes are needed prior to formal submittal to fulfill TPA Milestone M-44-02C. Without these changes, Ecology will be forced to reject this document as fulfilling M-44-02C. Ecology will evaluate and pursue options outlined in the TPA. 44439

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

Sincerely,

Dr. Alex Stone, Characterization Project Manager
Nuclear Waste Program

AS:mf

cc: Jackson Kinzer, USDOE
Maureen Hunemueller, USDOE
Jim Thompson, USDOE
Wen Liou, USDOE
Susan Eberlein, WHC

John W. Hunt, WHC
Ron Lerch, WHC
Merilyn Reeves, HAB
Richard Tontadonato, DNFSB
Administrative Record, M-44 TWRS Character.

Ecology's Comments on FY97 Draft TWAP

- The final TWAP must include a clear delineation of those documents which will be submitted to fulfill Milestone M-44-02C. In its current configuration, the TWAP delineates forty Tank Characterization Plans (TCPs) and states fifteen will be selected from this forty to fulfill M-44. Ecology has stated in its letter of June 4, 1996, that forty Tank Characterization Reports must be submitted to fulfill M-44-10. In addition, any future edition of the TWAP cannot provide a number of TCPs greater than forty and state that forty will be selected from this number. USDOE must clearly state which forty TCRs are to be submitted so Ecology can determine if the amount of analytical data included in the TCPs indicate sufficient technical data exists which will enable USDOE to meet M-44 requirements.
- The TWAP must also include a clear connection between those tanks selected for sampling and the priority of the tanks as stated in the *Tank Waste Characterization Basis* (WHC-SD-WM-TA-164, Rev. 2 [Draft]). Ecology understands this document is currently undergoing technical review. However, it will be finalized before completion of the TWAP, and it is necessary for the TWAP to substantiate the tanks selected for sampling based upon this prioritization document. USDOE will need to defend its selection of tanks and provide justification for any tank selected which does not have a high ranking as defined within this document. The current TWAP provides no such justification and without it, Ecology finds it difficult to evaluate the need for sampling some of the tanks selected based on the prioritization of TWRS programmatic needs as defined in the Characterization Basis.