



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

1315 W. 4th Avenue • Kennewick, Washington 99336-6018 • (509) 735-7581

August 16, 1996

Mr. Jim Goodenough
U. S. Department of Energy
P.O. Box 550
Richland, WA 99352



Dear Mr. Goodenough:

Re: FY97-FY99 Decontamination & Decommissioning (D&D) Multi-Year Budget Briefing

The Washington State Department of Ecology (Ecology) appreciates the D&D budget briefing provided on August 6, 1996. The information related to the 233-S Building has been reviewed and was informally discussed with Jim Goodenough on August 9, 1996. In preparation for the August 20, 1996, meeting to discuss Environmental Restoration (ER) budget proposals, the following comments regarding the proposed activities must be considered:

- On page 7, it indicates the emphasis has been placed on "the Expedited Response Action (ERA) for time critical removal of the 233-S Plutonium Concentration Facility." My letter regarding the regulatory status related to the 202-S and 233-S Buildings dated July 29, 1996, must be taken into account, since the applicabilities of Section 8 of the Tri-Party Agreement (TPA) are questionable. Ecology's position is priorities are established by the process of negotiating milestones for the TPA for facilities covered under Section 8. Compliance with the TPA is Ecology's first priority. It is Ecology's position the proposed process is not addressed by the TPA, and does not comply with Section 8 requirements for the development of an Ecology approved Surveillance and Maintenance (S&M) Plan, End Point Criteria, and Pre-Closure Work Plan (for Treatment, Storage, or Disposal [TSD] sites).
- On page 19, a key assumption, "area wide Engineering Evaluation/Cost Analysis for D&D integration under CERCLA will be acceptable to stakeholders," is identified. If the disposition (D&D) of the 233-S Building is to be accomplished under TPA Section 8, Section 8.3 must be followed. Ecology will need to review and approve the "long-term decommissioning plan," called for in Section 8.3.1.

Mr. Jim Goodenough

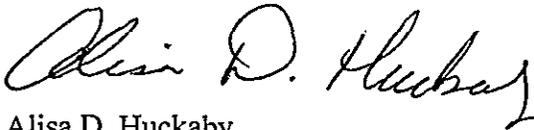
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- On pages 30 and 31, the Inactive Facility Surveillance and Maintenance (IFS&M) is discussed. The conductance of S&M and disposition is spelled out in Section 8 at the 233-S Building. We discussed the merits of conducting a value engineering analysis to compare the two options. Ecology supports the conductance of a value engineering analysis and believes it will provide the basis for a defensible justification for conducting future activities at the 233-S Building.
- On page 143, the issue is stated, "233-S has been selected as one of the first D&D under CERCLA Pilot Projects." See the comment for page 19.
- On page 143, the assumption stated is, "The project inventory removal will be accomplished as a CERCLA time critical removal action." See the comment for page 7.
- On page 143, it is indicated, "work activities in the Process Hood area are the only 'nuclear' activities associated with this job." Confirmation (preferably in the form of end point criteria) of the accuracy of this determination is requested.

Your consideration of these items is requested. In addition, a timely response to the nuclear activity designation/categorization question is requested. I look forward to discussing these issues with you on August 20, 1996. If you or your staff have any questions regarding this letter, please contact me at (509) 736-3034.

Sincerely,



Alisa D. Huckaby
S Plant Area Project Manager
Nuclear Waste Program

AH:RJ:sb

cc: Jeff Bruggeman, USDOE
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