



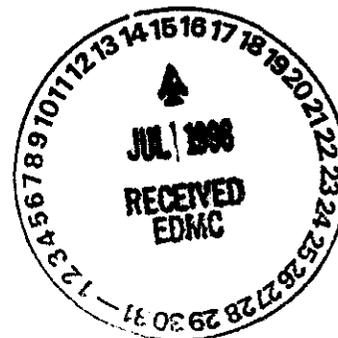
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STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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July 13, 1998

Dr. David S. Shafer  
U.S. Department of Energy  
P.O. Box 550, MSIN: S7-54  
Richland, WA 99352



Dear Dr. Shafer:

Re: Formal Acceptance Process for the Tank Waste Remediation System (TWRS)  
Vadose Program Plan

The formation by the Washington State Department of Ecology (Ecology) and the U.S. Department of Energy of a TWRS Vadose Zone Interagency Team has resulted in substantial progress in the development of a TWRS Vadose Zone Program Plan (Program Plan.) The most recent version of the Program Plan (June 25, 1998, draft) will be used by TWRS to justify funding requests for the implementation of vadose zone characterization and related mitigation activities for fiscal year (FY) 1999 and subsequent years.

Although the June 25 draft Program Plan meets many of the objectives that Ecology and other members of the team defined during the team forming process, Ecology has determined the current Program Plan to be inadequate and in need of further revision in the following areas:

- Section 1, Why the Vadose Zone, Objectives: The language describing the objective of the vadose zone characterization must be revised to reflect greater balance between the requirements for a sound scientific understanding of the vadose zone system and requirements for an understanding of the vadose zone sufficient to make decisions supporting retrieval, operations, etc.
- Section 3, Regulatory Framework: The document does not reflect a summary of the relevant vadose zone characterization drivers.
- Section 4, Technical Goals of the TWRS Vadose Zone Program: Language pertaining to the need for a sound scientific understanding of the vadose zone is missing.
- Section 5, Table 2: Sampling locations have not been agreed to. Table 2 and supporting text must be revised.
- Prioritization of both mitigation activities and initial and subsequent vadose zone characterization is missing. Prioritization of these issues must be included in the document.

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The identified sections of the current Program Plan must be revised prior to its formal acceptance by Ecology. Based on the rate of progress to date, Ecology has estimated the time frame for making the appropriate changes to the document to be approximately two (2) months, placing the completion of the Program Plan near the end of August 1998. Ecology has also enunciated, during recent TWRS Interagency Team meetings, the process that will enable Ecology to give final approval of the Program Plan. This process is as follows:

- Continued inclusion into the Program Plan of Ecology input.
- Review of the Program Plan by an external panel of scientists, preferably the existing SX expert panel. The external panel review must be iterative, with at least two (2) review cycles, an initial review and submittal of recommendations by the experts, and a second review to ensure that their input has been appropriately incorporated into the Program Plan.
- A final review by Ecology. The final Ecology review will also incorporate the comments and/or concerns of other team members. This review can either precede or run concurrently with the expert panel review.

If you have any questions, please contact me at (509) 736-3018, or Stan Leja at (509) 736-3046.

Sincerely,



Dr. Alex Stone, TWRS Project Manager  
Nuclear Waste Program

AS:sb

cc: Mary Harmon, USDOE  
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Stuart Harris, CTUIR  
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Wade Riggsbee, YIN  
Mary Lou Blazek, ODOE  
Administrative Record: SST TSD S-2-4 and Vadose Zone Characterization