



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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November 30, 1999

Mr. George Sanders
U.S. Department of Energy
P.O. Box 550, MSIN: A5-15
Richland, Washington 99352



Dear Mr. Sanders:

Re: Response to U.S. Department of Energy Recommendations on New Tanks Pursuant to M-46-01F

The Washington State Department of Ecology (Ecology) has completed its review of the latest version of the Operational Waste Volume Projection (OWVP), HNF-SD-WM-ER-029, Rev. 25. Ecology notes that the projection does not include information regarding the costs and schedules for building new tank capacity at the Hanford Tank Farms. Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement [TPA]) milestone M-46-00F requires that the U.S. Department of Energy (USDOE) either include or attach plans for acquisition of additional tanks based on the tank volume projection. In spite of the fact that the current projection shows additional double shell tank (DST) space will be needed to support current TPA milestones, no report on tank acquisition was included. In the future, Ecology will expect that this report include at least a cost estimate and schedule for the design, construction, and testing of new DSTs. This information is needed in order to assess the feasibility and impact of building new tank capacity in the future.

The treatment schedule as shown in the OWVP, and based on the British Nuclear Fuels, Limited (BNFL) contract, has significant impact on the Single Shell Tank (SST) Retrieval Program. Retrieval of SST wastes under disposal case 3s3 will not be completed until 2033. This assumes that treatment capacity is funded, constructed, and operated in accordance with the proposed BNFL contract and similar assumptions for expanding treatment capacity in outlying years.

At present, there appear to be some SSTs which, in spite of being interim stabilized, continue to release waste into the environment. This condition will become more prevalent in the future. There is currently no remedy for this short of full waste retrieval. Therefore, it is vital that some level of SST waste retrieval demonstration work continue in the early 2000 time frame. Maximizing available DST space is critical in allowing this SST program work to move forward. Because continued storage of wastes in the SSTs has increasing risks over time, Ecology cannot agree to simply building additional DSTs. We can however agree to coordinated efforts to

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maximize available DST space, ensure SST retrieval demonstrations move forward in the near term, and treatment begins on schedule.

Towards that end, Ecology agrees (for this year) to the construction of new DSTs under the following conditions:

- 1) An aggressive DST integrity assessment program is implemented to adequately assess the integrity of the DST system. The current effort which only looked at six (6) DSTs is not sufficient to ensure the DST system will be available as long as necessary to complete the waste disposal mission.
- 2) The SST Program must move forward in the coming years in developing a systems approach to closure at the SSTs. This includes performing an advanced retrieval technology deployment in the early 2000s. Ecology also expects that the SST Program will be prepared to backfill the DSTs, as space becomes available, both prior to, and during waste treatment operations.
- 3) Space is maximized in the DSTs. Not all actions identified during development of the Safe Interim Storage Environmental Impact Statement have been implemented by USDOE (e.g., consolidation of Neutralized Current Acid Waste [NCAW]). There are additional space saving measures identified in the projection which also could provide more DST capacity in the near term. Some of these (e.g., waste consolidation) have the potential to create significant free space in the DSTs. This space could be used to move waste from leaking SSTs sooner than currently projected.
- 4) The treatment plant is built and operated on the schedules agreed to in the TPA. If the decision on treatment plant(s) acquisition is negative, or the plant(s) is delayed, Ecology will have no choice but to require the construction of compliant tank systems to receive SST wastes. Perpetual storage in the failing SSTs is not an option. At this time ongoing releases from the SSTs are occurring, and are likely to increase in the future. The SSTs continue to store waste in non-compliant tank systems. Wastes must be removed from the SSTs and either treated and disposed or stored in a compliant and safe manner pending treatment and final disposal.

If USDOE can agree to these conditions, and takes necessary steps to implement them, then Ecology will agree not to establish new milestones for the construction of new tank capacity at this time.

The assumption in the OWVP for Interim Stabilization liquids is 6.2 million gallons. As noted in the text of the document, the revised estimate for Salt Well Liquid is 4 million gallons. This results in roughly 2 million gallons of tank space available. Ecology is requesting that a "special case" projection be run this winter to determine the impact of this change. We also ask that this

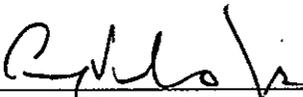
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case include a discussion of how much SST waste could be brought into the DSTs on a year-by-year basis.

Future OWVPs must include this discussion of SST waste retrieval capacity in the DSTs. The current projection only shows the difference between no retrieval and TPA retrieval. The year-by-year availability of DST space for SST retrieval is of vital importance to Ecology and the SST Program, and we ask that a more complete discussion of the possibilities be built into the OWVP in the future.

Because of the conditional nature of this letter, we are requesting that USDOE respond in writing. Please respond no later than January 31, 2000. Ecology is available to meet with you to discuss the OWVP and this letter, including expectations for future actions by USDOE. Please feel free to contact either of us. Tony Valero at (509) 736-5719 or, Suzanne Dahl at (509) 736-5705.

Sincerely,



Antonio Valero, Manager
Tank Waste Storage Project



Suzanne Dahl, Manager
Tank Waste Disposal Project

AV:SD:sb

cc: Doug Sherwood, EPA
Dana Bryson, USDOE
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Mary Lou Blazek, OOE
Administrative Record: DST/OWVP