



0070763

**Department of Energy**  
Richland Operations Office  
P.O. Box 550  
Richland, Washington 99352

AUG 31 2006

06-AMCP-0278

Ms. Jane Hedges, Program Manager  
Nuclear Waste Program  
State of Washington  
Department of Ecology  
3100 Port of Benton Boulevard  
Richland, Washington 99352

**RECEIVED**  
SEP 25 2006

**EDMC**

Dear Ms. Hedges:

PLAN FOR REVISION OF FEASIBILITY STUDY FOR THE 200-CS-1 CHEMICAL SEWER GROUP OPERABLE UNIT, DOE/RL-2005-63, DRAFT A AND PROPOSED PLAN FOR THE 200-CS-1 CHEMICAL SEWER OPERABLE UNIT, DOE/RL-2005-64, DRAFT A

The purpose of this letter is to provide the U.S. Department of Energy, Richland Operations Office (RL) plan for revision of the subject feasibility study, as requested in the State of Washington Department of Ecology's (Ecology) letter dated July 31, 2006.

The following information includes RL's plan for revision of the feasibility study.

Based on our review of Ecology's comments and other correspondence, RL has identified two significant areas that will be the focus of comment resolution activities:

- Integration of RCRA closure requirements with Comprehensive Environmental Response Compensation and Liability Act (CERCLA) remedial action requirement; and
- risk assessment methodology and application in the feasibility study.

A number of the comments requesting additional information or clarification require further discussion to ensure that the intent of the comment is clear. RL proposes a series of issue/comment resolution workshops starting in September 2006 to discuss and clarify comments, resolve comments where possible, and identify actions needed to resolve remaining areas of disagreement. Clarification of RCRA/CERCLA integration issues for the 200-CS-1 Operable Unit must be coordinated with the resolution of the overall issue currently being worked as part of the M-015 milestone negotiations.

AUG 31 2006

Within 45 days of completion of the issue/comment resolution workshops, RL will provide a detailed response to the feasibility study comments to Ecology for review. Following Ecology's feedback on the comment response, actions required by the agreed-upon resolutions will be completed and the feasibility study and proposed plan will be revised. Depending on the outcome of the comment resolution process, RL anticipates that substantial action may be required to revise the risk assessment contained in the feasibility study and to make the resultant changes to the remainder of the document. Accordingly, submission of the Draft B Feasibility Study and Proposed Plan is expected by September 28, 2007. This target date assumes that comment/issue resolution is completed and Ecology feedback is received by December 29, 2006, and may be adjusted, if necessary, to accommodate accelerations or delays in issue resolution.

If there are any questions, please contact me, or your staff may contact Matt McCormick, Assistant Manager for the Central Plateau, on (509) 373-9971.

Sincerely,



Keith A. Klein  
Manager

AMCP:BLF

cc: B. A. Austin, FHI  
D. B. Bartus, EPA  
G. Bohnee, NPT  
R. C. Brunke, FHI  
C. E. Cameron, EPA  
L. J. Cusack, Ecology  
S. Harris, CTUIR  
M. J. Hickey, FFS  
R. Jim, YN  
M. B. Lackey, FHI  
T. Martin, HAB  
R. D. Morrison, FHI  
K. Niles, ODOE  
R. E. Pippo, FHI  
J. B. Price, Ecology  
M. E. Todd-Robertson, FHI  
J. A. Vanni, Ecology  
J. A. Winterhalder, DFSH  
Administrative Record  
Environmental Portal