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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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May 7, 2007

Mr. Keith A. Klein, Manager
Richland Operations Office
United States Department of Energy
P.O. Box 550, MSIN: A7-50
Richland, Washington 99352

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EDMC

Re: Review of the Engineering Evaluation/Cost Analysis for the Plutonium Finishing Plant
Sub-Grade Structures and Installations, DOE/RL-2006-53

Dear Mr. Klein:

Thank you for the recent transmittal of the Engineering Evaluation/Cost Analysis (EE/CA) for the Plutonium Finishing Plant (PFP) Sub-Grade Structures and Installations, DOE/RL-2006-53, for the Department of Ecology review and comment. Ecology and the U.S. Environmental Protection Agency (EPA) have reviewed the subject document relative to the requirements of the M-83-22 Tri-Party Agreement (TPA) milestone and further defined in the M-83-01-03 Change Request (September 26, 2002), which states:

Completion of this milestone shall also require DOE to perform an evaluation of actions necessary to address below-grade structures or other structures or hazardous substances, dangerous waste or dangerous constituents remaining after completion of M-83-00A. This will include environment analysis and public review.

Ecology and EPA determined that the PFP Sub-Grade EE/CA satisfies the intent of the milestone. This is accomplished by evaluating actions necessary to address below-grade structures and by performing an environmental analysis of contamination present in the sub-grade.

However, the agencies have further determined that the document should not be issued as an EE/CA, but should be issued as an engineering evaluation and environmental analysis report. The reason for this change is that an EE/CA is followed by an Action Memorandum. The agencies believe it is not prudent to issue an action memorandum for the sub-grade structures at PFP since an action will not be taken at this time.

The selected alternative in the EE/CA is surveillance and maintenance for several years until the sub-grade work can be coordinated with other soils work in the vicinity of PFP. The agencies believe the best approach is to coordinate the plans for all soils work in the central plateau rather



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than develop a plan for the sub-grade at PFP independent of the other work. This future work will be planned in a remedial investigation/feasibility study followed by a proposed plan which will be issued for public comment.

With regard to completion of the M-83-22 TPA milestone, please provide an engineering evaluation and environmental analysis report for the PFP sub-grade structures. Public review of this document should consist of public notification of the availability of the environmental report. This report will also be placed in the administrative record and the appropriate repositories.

If you have any questions, please contact me at 509-372-7885.

Sincerely,



for
Rick Bond
Facilities Transition Project Manager
Nuclear Waste Program

pll

cc: Nick Ceto, EPA
Dennis Faulk, EPA
Stacy Charboneau, USDOE
Andrea Hopkins, FH
Gabriel Bohnee, NPT
Stuart Harris, CTUIR
Russell Jim, YN
Susan Leckband, HAB
Ken Niles, ODOE T-29
Administrative Record, PFP, M-83 M-83-22
Environmental Portal