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

07-AMCP-0246

AUG 14 2007

Ms. Jane Hedges, Program Manager
Nuclear Waste Program
State of Washington Department of Ecology
3100 Port of Benton Boulevard
Richland, Washington 99354

RECEIVED
AUG 22 2007
EDMC

Dear Ms. Hedges:

SUPPLEMENTAL REMEDIAL INVESTIGATION/FEASIBILITY STUDY (RI/FS) WORK PLAN FOR THE 200 AREAS CENTRAL PLATEAU OPERABLE UNITS, DOE/RL-2007-02, DRAFT A, VOLUMES I AND II

The purpose of this letter is to request approval of the Supplemental RI/FS Work Plan for the 200 Areas Central Plateau Operable Units, DOE/RL-2007-02, Draft A, Volumes I and II, (Work Plan). The Work Plan was issued on March 23, 2007, (07-AMCP-0126) to the U.S. Environmental Protection Agency (EPA) and the State of Washington Department of Ecology (Ecology) for review and approval in accordance with Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) Interim Milestone M-013-50 (due March 30, 2007). Approval is needed to initiate the planned supplemental remedial investigation field work necessary to meet the associated Tri-Party Agreement Interim Milestones identified in Change Package M-15-06-02, approved on February 25, 2007, and formalized in the latest version of the Tri-Party Agreement.

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Per the Tri-Party Agreement Action Plan Section 9.2, agencies are allotted a 60-day review for RI/FS Work Plans. Comments were received from EPA on June 1, 2007, and from Ecology on July 30, 2007.

Because this work plan addresses both EPA and Ecology lead regulatory agency operable units, approval is needed by both agencies. The delay in receiving comments from Ecology will impact initiation of field work and could impact timely completion of Tri-Party Agreement Interim Milestones in Change Package M-15-06-02. When the Work Plan is finally approved, the U.S. Department of Energy, Richland Operations Office (RL) will propose necessary Tri-Party Agreement Change Requests.

RL appreciates Ecology's comments and is currently reviewing them to support revision and approval of the document. To complete this review, RL needs clarification to better understand some of the comments and their basis. RL requests that Ecology provide the regulatory citation, Ecology's interpretation of the citation, and the citation's application to the CERCLA RI/FS decision process for the following comments:

1. "Ecology's regulatory requirements for deep vadose zone characterization must also be satisfied." RL is uncertain of the specific requirements that are not addressed in the work plan.

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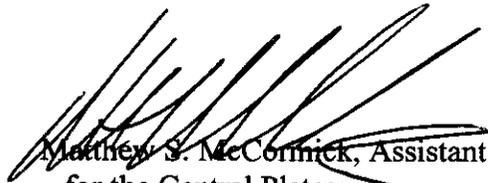
2. "One issue raised by Ecology during the DQO process was the responsibility of US DOE to fill any remaining data needs for closure of the dangerous waste management units covered by this RI/FS work plan (i.e., 216-A-10 Crib, 216-A-36B Crib, and 216-A-37-1 Crib) (WAC 173-303-610). The draft RI/FS work plan only partially addresses this issue. Ecology provided information to US DOE to support Ecology's rationale for wanting further lateral characterization for the PUREX Crib area and the 216-A-45 Crib." RL is uncertain of the data needs Ecology believes are lacking. Further, RL is unclear on the information provided to support Ecology's rationale for further lateral characterization. RL requests Ecology to provide their interpretation of the WAC 173-303-610 citation and how that supports decision making under the CERCLA RI/FS process.

In addition, a large number of the wells identified are up-gradient of the referenced waste sites. RL requests clarification on Ecology's concern related to those wells, the relationship to the subject waste sites, and the data deficiencies. Further explanation of the specific concern and Ecology's identification of the specific data deficiencies are requested.

3. "We want to remind you that an observational approach to all sampling must be followed." RL requests clarification on the regulatory driver for this comment.
4. "WMA-A-AX and area wells (E-23-1, E-24-24, E-24-18, E-24-16, E-17-19, E-17-14, and E-25-93) showed increases as follows: gross beta, nitrate levels, I129, Tc99, tritium, chrome, manganese, vanadium, and uranium (Annual Ground Monitoring Report 2006). Ecology requests you revise this RI/FS work plan to reflect and incorporate these changes (e.g. lateral pushes) to correct data deficiencies and to include a schedule for a follow-up DQO." RL also requests clarification of this comment to better understand Ecology's concern.

At this time RL is evaluating the remainder of the comments provided and will either respond to Ecology or request further clarification. Response to the requests above will allow us to proceed expeditiously with our evaluation and development of responses or proposed changes to the document. If you have any questions, please contact me, or your staff may contact Briant Charboneau, of my staff, on (509) 373-6137.

Sincerely,



Matthew S. McCormick, Assistant Manager
for the Central Plateau

AMCP:BLF

cc: See Page 3

Ms. Jane Hedges
07-AMCP-0246

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Administrative Record *H-0-11*
Environmental Portal