

9106213



December 19, 1991

Steven H. Wisness
Tri-Party Agreement Manager
U.S. Department of Energy
P.O. Box 550, A5-19
Richland, Washington 99352



Re: Laboratory Analytical Services

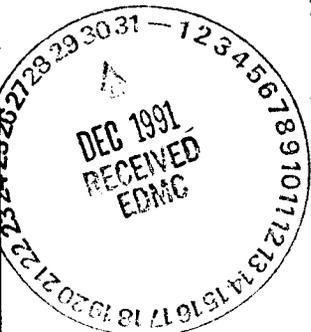
Dear Mr. Wisness

It has come to my attention that we may have a potential problem in the area of analyzing low-level radiological samples as part of the remedial investigation/feasibility study (RI/FS) process. This issue may or may not be related to the current dispute regarding Milestone M-14-00.

During the December 17, 1991 Operable Unit Managers Meeting, the Department of Energy (DOE) apparently discussed a laboratory capacity problem for RI/FS soil samples that will exceed 10 nanocuries/gram (specific radionuclide[s] unknown). The problem appears to be a restriction on shipping such samples to off-site contract laboratories. We have no details on the requirements that restrict DOE from shipping these samples off-site. If such requirements must be followed, it appears that DOE's only option would be to analyze these samples at the on-site laboratories (the 222-S and 325 laboratories). Our understanding is that these two laboratories are already working on a backlog of samples and are failing to meet specified turnaround times. If this is the case, we envision problems in meeting the RI/FS schedules, based on the number of samples we expect to fall into this range.

I am requesting that DOE respond to this issue, in writing, no later than January 3, 1992. Specifically, I am asking that the following information be provided:

1. Details on restrictions pertaining to shipment of samples to off-site commercial laboratories, based on limitations measured in either nanocuries/gram or millirem/hour, and on any other criteria currently in effect. Copies of the specific documentation (policy, orders, regulations, etc.) that impose such restrictions, including the effective date.
2. Estimates of the number of samples, by operable unit, which may be restricted from shipment to off-site commercial laboratories in calendar years 1992, 1993, and 1994. Detailed accounting is not necessary; we are trying to understand the general magnitude of this issue. Hot cell samples are excluded.



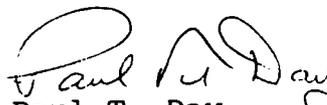
3. Description of actions that have been taken or will be taken to ensure that samples which fall into this category of off-site shipment restrictions will be analyzed in a timely manner, without impact to the RI/FS schedules.
4. Description of how this issue relates to the current dispute regarding Milestone M-14-00. Estimate of the number or percent of samples in item 2 above, that could have been analyzed in the production scale Waste Sampling and Characterization Facility, had it been operational in January 1992. This information might best be displayed by creating a table or matrix to include information in response to both items 2 and 4.

It is also my understanding that DOE unit managers were proposing that the Environmental Protection Agency (EPA) consider modifying the approach to the rescoped RI/FS in the 100 Area operable units, by collecting fewer of those samples which might be subject to off-site shipment restrictions. This proposal is not acceptable to EPA. We must have adequate analytical information in order to make informed and correct decisions regarding cleanup.

We find it disturbing that this issue is just now surfacing, after going through a period of several months of detailed negotiations on how to streamline the RI/FSSs. The concept of streamlining has been on the table for nearly two years, with a focus on getting into cleanup sooner and addressing the waste sites on a "worst first" basis. Constraints on laboratory analytical capability were not been mentioned during that period. To the contrary, DOE has argued strongly that its off-site contract laboratory approach for low-level sample analyses is the best approach for keeping RI/FSSs on schedule.

If you have questions on any of the above, please contact me at (509) 376-6623 or, in my absence, contact Doug Sherwood at (509) 376-9529.

Sincerely,



Paul T. Day
Hanford Project Manager

cc: Tim Nord/Larry Goldstein, Ecology
Randy Smith/George Hofer, EPA
Tim Veneziano, WHC
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Incoming: 9106213

Subject: LABORATORY ANALYTICAL SERVICES

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