



STATE OF WASH
DEPARTMENT OF ECOLOGY

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July 21, 1992



Mr. Steve Wisness
U.S. Department of Energy
P.O. Box 550
Richland, WA 99352

Dear Mr. Wisness:

Re: Comments on Draft Issue Paper for Interim Stabilization of Single Shell Tanks at Hanford (M-05)

Reference: Letter; S. Wisness, RL to F. Day and D. Jansen, "Stabilization of Remaining Single Shell Tanks at Hanford", dated July 10, 1992.

Ecology has reviewed the above referenced letter and the enclosed draft issue paper. We have also received a briefing on this issue paper from members of Energy and Westinghouse staff on Friday, July 17. The following comments are based on both the issue paper and the briefing.

Energy has proposed changing the M-05 milestones and adding new milestones for retrieval of wastes from the Single Shell Tanks (SSTs). The issue of retrieval has been raised by various groups within Energy recently, and Ecology has had numerous indications that early retrieval is now Energy's preferred action for the SSTs. However, there has been no formal correspondence with Ecology on this issue. Ecology has long been a proponent of waste retrieval at the SSTs, and we continue to encourage this approach. If Energy is committed to SST waste retrieval, it should be clearly and formally communicated to Ecology by Energy Headquarters. Negotiations proposed by the subject issue draft paper is the ideal time to clarify this position.

Interim stabilization of the SSTs has been the primary method of preventing and/or mitigating tank leaks. Ecology is fully aware of the various problems experienced at the SSTs over the past year. Some of the difficulties outlined in the issue paper are substantial, and it is apparent that the September, 1992, milestone (M-05-04) will not be met. Whatever the reasons for not achieving the interim stabilization milestones, it is not appropriate to abandon stabilization. Several tanks, some on the watchlist, are assumed leakers. Stabilization of these tanks is currently the only near-term leak mitigation measure. In addition, some of the tank farms have had significant failure rates (as indicated by the current number of assumed leakers), and the



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Author: D. B. Jansen, Ecology
Addressee: S. H. Wisness, RL
Correspondence No.: Incoming: 9205229
Subject: COMMENTS ON DRAFT ISSUE PAPER FOR INTERIM STABILIZATION OF SINGLE SHELL TANKS AT HANFORD (M-05)

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