



Department of Energy

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DEC 31 1992

Mr. Paul T. Day  
Hanford Project Manager  
U.S. Environmental Protection Agency  
Region 10  
712 Swift Boulevard, Suite 5  
Richland, Washington 99352

Mr. David B. Jansen, P.E.  
Hanford Project Manager  
State of Washington  
Department of Ecology  
Post Office Box 47600  
Olympia, Washington 98504-7600

Dear Messrs. Day and Jansen:

REBASELINING THE TANK WASTE REMEDIATION SYSTEM (TWRS) CHARACTERIZATION PROGRAM  
BASED ON RETRIEVAL OF HANFORD'S SINGLE-SHELL (SST) WASTES

Enclosed is the November 24, 1992, memorandum from Leo P. Duffy, Assistant Secretary for Environmental Restoration and Waste Management, of the U. S. Department of Energy (DOE), Headquarters (HQ). The memorandum proposes that the SST Characterization Program and the associated Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) milestones be reevaluated (i.e., rebaselined) to reflect the retrieval requirements. Characterization data will be required to: 1) resolve tank safety issues; 2) develop retrieval technologies; and 3) identify pretreatment technologies. This reinforces prior DOE guidance on the commitment to retrieve SST wastes and places emphasis on the need for a new technical baseline for the Waste Characterization Program. Once the baseline is established it must be incorporated into Tri-Party Agreement milestone M-10-00 and its supporting interim milestones.

It is the DOE, Richland Field Office's (RL) position that this memorandum confirms DOE commitment to retrieve Hanford SST wastes. As you may recall, from prior Tri-Party Agreement Project Manager meetings, the regulators were not in the position to renegotiate the analysis and data reporting requirements until written correspondence from HQ was received.



DEC 30 1992

Please advise us by return correspondence if this memorandum meets your needs with respect to modifying data package requirements. If you have any questions, please contact Mr. John M. Clark, Chief, TWRS Waste Characterization Branch on (509) 376-2246.

Sincerely,



Steven H. Wisness  
Hanford Project Manager

SFD:PRH

Enclosure

cc w/encl:

S. McKinney, Ecology

D. Sherwood, EPA

J. Propson, WHC

T. Veneziano, WHC



# memorandum

DATE: November 24, 1992

REPLY TO  
ATTN OF: EM-36:Tseng

SUBJECT: Retrieval of Single-Shell Tank Waste

TO: Manager, DOE Richland Field Office

The "Disposal of Hanford Defense High-Level, Transuranic and Tank Wastes Final Environmental Impact Statement" (HDW-EIS) Record of Decision (ROD) deferred the decision on disposal of single-shell tank (SST) wastes. As stated in the ROD, this deferral was based upon a determination that additional development and evaluation, including waste characterization, was needed prior to a decision on disposal of this waste. Following this additional development and evaluation, the ROD indicated that alternatives for final disposal would be analyzed in a supplement to the HDW-EIS before the final disposal decision is made.

The Department of Energy (DOE) is more knowledgeable about the hazards posed by the wastes stored in the SSTs than it was when the ROD was issued. Also, regulations governing the management and disposal of radioactive wastes may preclude shallow-land disposal of the wastes contained in the SSTs. The recognition of the hazards associated with the SST wastes, combined with DOE's commitment to meet both the letter and intent of all environmental laws and regulations governing management of waste at DOE sites, particularly the Resource Conservation and Recovery Act (RCRA) regulations, lead DOE to propose to retrieve the SST wastes for disposal since stabilization and near-surface isolation of the wastes no longer appears to be a reasonable option. The planning base for the wastes in SSTs now is that they will be retrieved. This is reflected in the Secretary's memorandum dated December 20, 1991, which established the Tank Waste Remediation System (TWRS).

The SST characterization milestones in the Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement or TPA) are geared toward providing data to support a "leave or retrieve" decision. Thus, re-evaluation of the SST characterization program and associated milestones in the TPA is warranted now that DOE is proposing that the SST wastes be retrieved. SST characterization efforts should focus on data needed to (1) resolve tank safety issues, (2) develop appropriate retrieval technologies, and (3) identify needed pretreatment technologies.

Please direct your staff to expedite development of the technical documentation, issue paper, and change package necessary to initiate negotiations with the State of Washington Department of Ecology and U.S. Environmental Protection Agency to propose modifications to the Tri-Party Agreement SST characterization program and milestones to better align with these changing program needs.

If you have any questions regarding DOE's intent to retrieve SST waste, or regarding the need to negotiate changes to the characterization milestones, please contact John Tseng of my staff at 301-903-7170.



Leo P. Duffy  
Assistant Secretary for Environmental  
Restoration and Waste Management

Concurrence: EH-20

  
11/23/92

GC-11 W. Dennison

11/16/92

cc:

R. Berube, EH-20  
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**Subject:** REBASELINING THE TANK WASTE REMEDIATION SYSTEM (TWRS) CHARACTERIZATION PROGRAM BASED ON RETRIEVAL OF HANFORD'S SINGLE-SHELL (SST) WASTES

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