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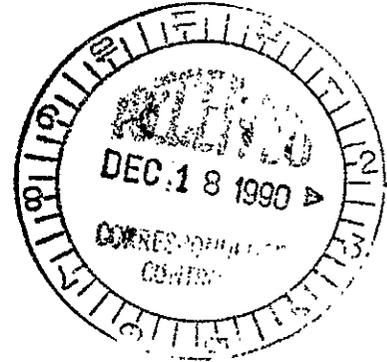
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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Mail Stop PV-11 • Olympia, Washington 98504-8711 • (206) 459-6000

December 10, 1990

Mr. Steve Wisness
Hanford Project Manager
P.O. Box 550
Richland, Washington 99352



RE: Ecology Review of 100-NR-1 and 100 NR-3
Operable Unit Work Plans

Dear Mr. Wisness:

On October 16, 1990 Ecology received copies of the 100-NR-1 and 100-NR-3 Operable Unit Work Plans for review. The cover letter stated the review of these documents was due no later than December 12, 1990. Ecology will not comply with this request for the following reasons:

- o the 100-NR-3 Work Plan is not due to be submitted until January 31, 1990 on the "accelerated schedule", and not due until April 1991 as originally scheduled in the TPA;
- o the 100-NR-1 Work Plan is not due to be submitted for regulatory review until December 31, 1990;
- o the "streamlining" concept for review of operable unit work plans is not working; it is not in our mutual interest to have Ecology and EPA provide comments on documents not reviewed, revised and approved by USDOE;
- o Ecology did not intend, and does not agree, that the initial concept for concurrent review of pre-decisional work plans should result in the 60-day comment period beginning with these early submittals.

Since the review of these work plans should occur in parallel due to integration requirements, we intend to begin formal review of both plans in January 1991. Comments will be submitted to USDOE no later than March 1, 1991.



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Mr. Steve Wisness
Page 2

As noted above, regulatory review of work plans not approved by USDOE is inefficient, and does not appear to result in a net savings of time, costs, or better written documents. Operable unit work plans continue to lack both internal and external consistency that make review time-consuming, difficult and frustrating. Work plans must reflect the collaborative process and agreements from prior, approved work plans. We urge USDOE to provide additional oversight prior to submitting work plans for regulatory review.

We also request clarification regarding funding to finalize and implement the 100-NR-1 and -3 work plans. Your cover letter indicates the current budget does not allow regulatory comments to be incorporated into the work plan. We expect all necessary funding will be provided to carry out further development and implementation of these operable unit work plans.

If you or your staff have any questions please direct them to Larry Goldstein at (206) 438-7018.

Sincerely,



Timothy L. Nord
Hanford Project Manager
Nuclear & Mixed Waste Management

cc: Roger Stanley
P. Day, EPA
~~W. Veneziano, WHC~~



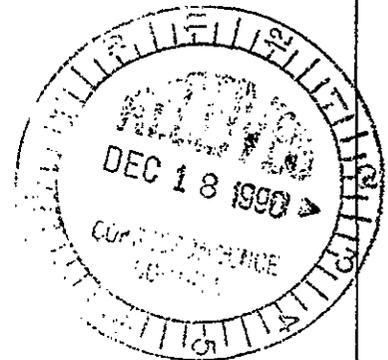
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