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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

1315 W. 4th Avenue • Kennewick, Washington 99336-6018 • (509) 735-7581

November 14, 1994

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

William T. Dixon, Manager
Environmental Services
Westinghouse Hanford Company
P.O. Box 1970
Richland, WA 99352

Messrs. Bauer and Dixon:

Re: 216-B-3 Expansion Ponds Closure Plan, Revision 2 (D-2-5) 9009

The Washington State Department of Ecology received the 216-B-3 Expansion Ponds closure plan, revision 2 (DOE/RL-89-28) and the Notice of Deficiency (NOD) Comment Response Resolution Table. The closure plan adequately addressed most of the NOD comments but the following need further action:

- | NOD # | Necessary Action(s) |
|-------|---|
| 37. | The DOE-RL/WHC response contains an incorrect citation to the Washington Administrative Code (WAC) chapter 173-303-090. The text of the closure plan correctly cites WAC 173-303-070. Amend the response table to reflect disposition of this comment. [page 3-3, line 18 of closure] |
| 259. | The revised text is not consistent with the response table. It will be necessary to conduct a line and/or page change to the closure plan to bring it into agreement with the language of the NOD response table. [page 5-1, line 23 of closure] |
| 260. | A sentence to be added to the text of the closure plan was omitted in revision. From the DOE-RL/WHC response, add "The analytical results are presented in |



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more detail in Chapter 7, Closure Activities, Section 7.1.5 and in Appendix C, Phase 1 Sampling Results. A line and/or page change to the closure plan will be necessary to make it consistent with the language agreed to in the response table. [page 5-1, line 29 of closure]

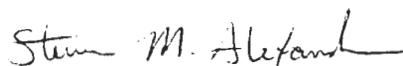
261. The word "stream" was omitted from the revised text. A line and/or page change to the closure plan will be necessary to make it consistent with the language agreed to in the response table. [page 5-1 of the closure]
269. The text incorrectly cites "(DOE 88)" in place of "(EPA 89b)." To correct this error, and maintain consistency with other text, delete reference to issuing agency while maintaining cite to regulation. [page 5-6, line 29 of closure]
271. A citation to WAC 173-303-645(8) has been inserted into the revised text in several places. This change was not addressed in the response table. Response number 271, which addresses the deletion of an incorrect citation to WAC 173-303-9905, should be modified to explain insertion of WAC 173-303-645(8). [page 5-7, line 44 of closure]
279. Apparently, revision 1 of the closure plan contained a typographical error for which a NOD comment was produced. Well 699-43-32K was commented on and responded to without knowledge of the error. Through discussions with WHC staff, it was determined well 699-43-32K should be well 699-43-42K. Revision 2 correctly addresses the well title. Amend the response table to fully address the NOD comment.
280. The response refers to response number 18 for resolution. Apparently, during consolidation of the response table prior to submittal, the numbering sequence was disrupted. Number 18 referred to in the DOE-RL/WHC response should be number 274. Amend the response table to reflect disposition of this comment.
283. The response refers to response number 18 and 19 for resolution of this NOD. Apparently, during consolidation of the response table prior to submittal, the numbering sequence was disrupted. Number 18 referred to in the response should be number 274 and number 19 should be 275. Amend the response table to reflect disposition of this comment.

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In order to maintain the proposed schedule to complete closure of this unit by June 1995, please provide a response by November 30, 1994.

If you have any questions, please call me at (509) 736-3019.

Sincerely,



for Jeanne Wallace
Unit Manager
Nuclear Waste Program

JW:skr

cc: Rhett Tranbarger, BHI
Bill Burke, CTUIR
Mary Harmon, USDOE
Ellen Mattlin, USDOE
Richard Person, USDOE
Donna Wanik, USDOE
Paul Beaver, EPA
Dan Duncan, EPA
Donna Powaukee, Nez Perce Tribe
Andrea Prignano, WHC
Fred Ruck, III, WHC
Russell Jim, YIN

Administrative Records:

216-B-3 Expansion Ponds
200-BP-11 Operable Unit