



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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June 11, 2020

20-NWP-106

Brian T. Vance, Manager
Office of River Protection
United States Department of Energy
PO Box 450, MSIN: H6-60
Richland, Washington 99352

Re: Department of Ecology Response to Letter 19-TPD-0029, “U.S. Department of Energy, Office of River Protection Response to Letter 19-NWP-194, ‘Department of Ecology’s (Ecology) Review and Assessment of the Maintenance and Performance Monitoring Plan, RPP-RPT-61684’”

References: See page 3

Dear Brian T. Vance:

The Department of Ecology (Ecology) acknowledges receipt of your letter 19-TPD-0029 (Reference 1), regarding the United States Department of Energy’s (USDOE) submittal of the *Maintenance and Performance Monitoring Plan*, RPP-RPT-61684 Revision 00B (Reference 2), which reports certain maintenance and monitoring activities that have occurred at the existing interim barriers at Hanford’s tank farms.

Document RPP-RPT-61684, Revision 00B, does not fulfill the requirements listed in *Hanford Federal Facilities Agreement Consent Order* (HFFACO), Milestone M-045-92 for a Maintenance and Performance Monitoring Plan for the Interim Barriers Program (the Plan).

As defined in Milestone M-045-92, Ecology expects the Plan to be a work plan describing how maintenance and monitoring of performance of interim barriers will be performed and reported to Ecology, to ensure prevention of water intrusion under the interim barriers at Hanford’s tank farms over the nominal 25-year service life of the interim barriers.

In particular:

1. The title of the document should be “Maintenance and Performance Monitoring Plan for the Interim Barriers Program” and not “Maintenance and Performance Monitoring Plan.”
2. The Plan should address inspections, maintenance and repairs of interim barriers to ensure prevention of water intrusion under the barriers over the nominal 25-year service life of the interim barriers at Hanford.

Please refer to the revised Outline, provided by email on April 14, 2020 (Reference 3), for more details of Ecology expectations.

3. The Plan should address systematic performance monitoring of tank farms covered with interim barriers. For each tank farm with an interim barrier, the Plan will evaluate and propose appropriate barrier performance monitoring activities. These activities will be selected as appropriate for each interim barrier to address the following:
 - In-tank monitoring (e.g., surface level and liquid observation wells), and ex-tank drywell monitoring.
 - Results of completed monitoring data collection and evaluation of performance based on the collected data.
 - Results of completed tank leak assessments.
4. Ecology expects the Plan to be updated and re-submitted with the submittal to Ecology for approval of each new interim barrier design.
5. The Plan should describe the form and content of yearly progress reports that will be submitted to Ecology summarizing the results of maintenance and performance monitoring activities for the previous years, and research completed to evaluate new performance monitoring technologies.

Please provide the revised Maintenance and Performance Monitoring Plan within the timeframes specified in the HFFACO “Action Plan” for primary documents. Ecology appreciates the spirit of collaboration while working together with USDOE and Washington River Protection Solution on this project.

If you have any questions, please contact me at jeff.lyon@ecy.wa.gov or (509) 372-7914, or Maria Skorska, SST Closure Engineer, at maria.skorska@ecy.wa.gov or (509) 372-7891.

Sincerely,



Digitally signed by
Lyon, Jeffery (ECY)
Date: 2020.06.11
16:05:24 -07'00'

Jeffery J. Lyon
Tank Systems Operations & Closure Project Manager
Nuclear Waste Program

ms/aa

cc: See page 3

References:

1. Letter 19-TPD-0029, dated December 11, 2019, "U.S. Department of Energy, Office of River Protection Response to Letter 19-NWP-194, 'Department of Ecology's (Ecology) Review and Assessment of the Maintenance and Performance Monitoring Plan, RPP-RPT-61684'"
2. USDOE Document RPP-RPT-61684, Revision 00B, Maintenance and Performance Monitoring Plan, dated October 8, 2019
3. Email date April 14, 2020, from Maria Skorska, Ecology, to Margaret Lamothe and Dan Parker, USDOE-ORP, Subject: RE: Draft Revised Outline for the M&PM Plan

cc electronic:

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