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STATE OF WASHINGTON

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## DEPARTMENT OF ECOLOGY

7601 W. Clearwater, Suite 102 • Kennewick, Washington 99336 • (509) 546-2990

December 20, 1993

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



Dear Mr. Wisness:

17933

17932

Re: 100-NR-1, Draft B and 100-NR-2, Draft A, RFI/CMS Work Plans

The Washington State Department of Ecology and the United States Environmental Protection Agency have reviewed the response submitted by the United States Department of Energy by transmittal letter 94-ERB-018, on the 100 NR-1 and 100-NR-2 regulatory comments dated November 11, 1993.

→ 3363

Enclosed is the requested alternative text with additional comments which we look forward to discussing. We anticipate receiving the revised workplans within thirty days of receipt of this transmittal, at which time the documents will be submitted for public comment. Should you or your staff have any questions regarding this letter, please do not hesitate to contact me at (509) 736-3029.

Sincerely,

Phillip R. Staats  
Unit Manager  
Nuclear and Mixed Waste Management Program

PS:mf  
Enclosure

cc: Julie Erickson, USDOE  
Bryan Foley, USDOE  
Pam Innis, EPA  
Administrative Record (100-NR-1, 100-NR-2)



DEC 1993  
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Becky A. Austin

9413139.1125

**Ecology Comment No. 1**

Section 1.0, page 1-2, first paragraph

**Deficiency:** The proposed paragraph indicates that no cleanup may be accomplished in the operable unit until N Reactor shutdown is accomplished. This is not the case. Non-interfering sites should be evaluated for remediation prior to the scheduled reactor shutdown.

**Recommendation:** Replace the proposed paragraph with following: USDOE will identify the program interfaces and schedules of the Operations and D&D programs and build a 100-NR-1 schedule to coincide with them. Once a 100-NR-1 RFI/CMS schedule has been approved, relief may be required as the realities of funding the three programs become known.

**Ecology Comment No. 9**

Section 2.1.1, page WP 2-1, fifth paragraph and Table 4--2, sheet 6 of 7

No comment necessary.

**Ecology Comment No. 77**

Section 4.2.1.2, page 4-11, first paragraph

**Deficiency:** See Ecology Comment No. 1

**Recommendation:** Add the following to the above referenced paragraph: Those medium and low priority sites which do not impact the operating systems required for reactor shutdown will be evaluated for remedial action on an individual basis.

**Ecology Comment No. 125**

Section 6.0, Figure 6-1

**Deficiency:** No justification for the 24 month delay is provided.

**Recommendation:** As no justification for the 24 month delay is provided, adjust the Interim ROD start date to September 1995 and insert language which addresses the evaluation and remedial action of non-interfering sites.

**Proposed Revision to Chapter 6**

Section 6.2, second paragraph

**Deficiency:** See Ecology Comment No.125.

**Recommendation:** Reschedule the Interim ROD to September 1995 with the concept of moving ahead on remedial action of medium and low priority sites within the Operable Unit.

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Section 6.2, fourth paragraph

**Deficiency:** Units 116-N-1 and 116-N-3 no longer represent an interference.

**Recommendation:** Delete the first three sentences of the paragraph beginning with, "An example of interference . . ." and concluding with, ". . . before all discharges had stopped."

Attachment 1, Table 1

**Deficiency:** See Ecology comment Section 6.2, fourth paragraph.

**Recommendation:** Change the status of 116-N-1 and 116-N-3 to reflect a no interference description.

**Ecology Comment No. 127**

Figure 6-1, Operable Unit Schedule, pocket insert

No comment necessary.

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100-NR-2

**Ecology Comment No. 1**

Section 1.0, page WP 1-2, first paragraph on this page

**Deficiency:** The proposed paragraph indicates that no remedial activity can begin until N Reactor deactivation occurs. This is not the case. Non-interfering sites can be remediated in the interim.

**Recommendation:** Replace the proposed paragraph with the following: USDOE will identify the program interfaces and schedules of Operations and D&D programs, and build a 100-NR-2 schedule to coincide with them. Once a 100-NR-2 RFI/CMS schedule has been approved, relief may be required as the realities of funding the three programs become known.

**Ecology Comment No. 8**

Section 2.1.1, page WP 2-1, fifth paragraph on this page

No comment necessary.

**Ecology Comment No. 81**

Section 5.1.3.1 (5.1.13.1), page WP 5-4, fifth paragraph on the page

No comment necessary.

**Ecology Comment No. 103**

Figure 6-1, Operable Unit Schedule, pocket insert

No comment necessary.

**Ecology Comment No. 143**

Section 3.6, page D1-5

No comment necessary.

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Author

Addressee

Correspondence No.

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S. H. Wisness, RL

Incoming: 9400660

Subject: 100-NR-1, DRAFT B AND 100-NR-2, DRAFT A, RFI/CMS WORK PLANS

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