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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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July 26, 1999

Mr. Richard French
Office of River Protection
Richland, Washington 99352

Mr. George H. Sanders
U.S. Department of Energy
P.O. Box 550, MSIN A5-15
Richland, Washington 99352



Dear Messrs. French and Sanders:

Re: Comments on Draft Fiscal Year (FY) 2000 Technical Sampling Basis and
Waste Information Requirements Document

The Washington State Department of Ecology (Ecology) has reviewed the *Draft Fiscal Year 2000 Tank Characterization Technical Sampling Basis and Waste Information Requirements Document, HNF-4048, Revision A* (TSB-WIRD), that was submitted to satisfy the Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement [TPA]) Milestone M-44-13C. In general, Ecology accepts this draft document, even though it is incomplete.

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The draft TSB-WIRD starts well and does a good job of describing the issues and ranking the tanks for sampling. While the TSB-WIRD does list the number of tanks and identifies which tanks need to be sampled for each issue in FY 2000, it does not make any commitment as to which tanks, or how many tanks, will actually be sampled. The line for "Total Tanks Scheduled FY2000" in Table 8-1 has been left blank; it is difficult to review and comment on an incomplete draft. Ecology does not have a clear picture of the United States Department of Energy's (USDOE) actual characterization plans for FY 2000.

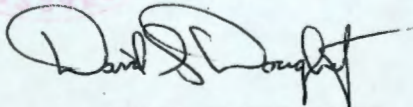


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Additionally, the TSB-WIRD does not clarify USDOE's plans regarding the implementation of the *Regulatory Data Quality Objectives (DQO) Supporting Tank Waste Remediation System Privatization Project*. USDOE knows this aspect is of particular interest to Ecology, but has not established a positive path forward on this DQO. USDOE made some progress in clarifying their tank waste characterization plans during a meeting with Ecology on July 13, 1999. The final TSB-WIRD is due at the end of August, and Ecology expects that USDOE will be prepared to fill in the blanks with acceptable and appropriate numbers to clarify USDOE's commitments for FY 2000 tank waste characterization.

Ecology appreciates the efforts USDOE has made. If you have any questions, please feel free to contact me at (509) 736-3047.

Sincerely,



David S. Dougherty, P.E.
Nuclear Waste Program

DD:ld

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Administrative Record: Tank Waste Characterization