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APR 23 2000

00-ORL-043

Ms. Jane Hedges
Perimeter Areas Section Manager
Nuclear Waste Program
State of Washington
Department of Ecology
1315 W. Fourth Avenue
Kennewick, Washington 99336

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EDMC

Dear Ms. Hedges:

HANFORD FEDERAL FACILITY AGREEMENT AND CONSENT ORDER (TRI-PARTY AGREEMENT) MILESTONE M-24

This letter offers a proposed resolution from the U.S. Department of Energy, Richland Operations Office (RL), and the Office of River Protection (ORP) to the dispute for drilling wells to comply with the Tri-Party Agreement Milestone M-24 in Calendar Year (CY) 2000. The proposal includes an alternative number of wells to be drilled this year and a process to establish long-term Resource Conservation and Recovery Act (RCRA) monitoring well needs.

RL and ORP met with your staff on March 23, 2000, to clarify the State of Washington Department of Ecology (Ecology) position for requiring 19 new RCRA wells in the Hanford Site for CY 2000, our fourth meeting to establish the number and location of wells for Tri-Party Agreement Milestone M-24 for CY 2000. The meeting was helpful in that we now understand the rationale for each of the 19 wells stipulated by Ecology on March 3, 2000, via a proposed Tri-Party Agreement change request. We understand that Ecology's near-term priority is to upgrade detection monitoring networks impacted by declining water levels and dynamic flow directions, focusing first on the single-shell tank (SST) waste management areas (WMA's). RL and ORP agree with the point of focusing first on improving the detection monitoring networks at the SST's. Monitoring has shown over the past few years that these facilities have contributed contaminants to the groundwater.

Collectively, DOE can offer a total of 15 wells for CY 2000. Twelve of these wells may be installed for detection of contaminants at SST WMA's. The remaining three wells may be located at priority locations on the Hanford Site. Alternatively, all of these wells may be sited for the primary purpose of monitoring SST's if Ecology desires to solely focus on these WMA's in CY 2000. We believe that specific locations for these wells can easily be established in a short meeting once agreement on the number has been reached.

Ms. Jane A. Hedges
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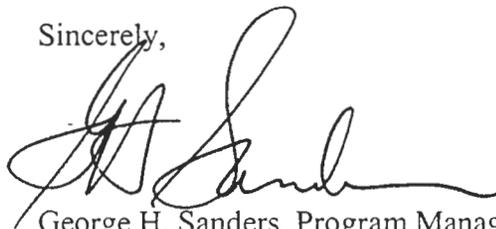
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Efforts should now focus on defining a long-term planning basis for improving the detection monitoring systems and establishing the wells needed for groundwater assessment purposes. The circumstances that drive the design of the groundwater-monitoring network have changed since the M-24 milestone was emplaced. The issues of a declining water table, changing groundwater flowpaths, and distinguishing contaminant sources at the SST's WMA's have complicated decisions on the number and placement of monitoring wells. We recommend that we work quickly to come to agreement on the locations for the 15 DOE-proposed CY 2000 wells so attention can be focussed on defining a multi-year planning basis, including programmatic impacts and priorities.

RL proposes that an Agreement In Principle be drafted and submitted which would establish a process for Ecology and RL to attend a series of workshops to review and evaluate technical data quality objectives, and establish appropriate outyear Tri-Party Agreement milestones for RCRA monitoring wells. This process would frame the remaining milestones and would focus on early joint prioritization, planning and schedule efforts to integrate the technical, regulatory, and fiscal issues into a mutually agreed-to path forward. This effort will better align RCRA well drilling planning with the federal budget process.

DOE would like to reach a consensus with Ecology that would allow priority work to continue while making a planned effort toward upgrading the Hanford Site groundwater-monitoring network. If you have any questions, please contact me at (509) 376-6888, or your staff may contact Mike Thompson, Acting Program Manager, Groundwater/Vadose Zone Program, at (509) 373-0750.

Sincerely,



George H. Sanders, Program Manager
Office of Regulatory Liaison

ORL:MJF

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