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Department of Energy
Richland Operations Office
P.O. Box 550
Richland, Washington 99352

06-AMCP-0005

OCT 31 2005

Mr. Nicholas Ceto, Program Manager
Office of Environmental Cleanup
Hanford Project Office
U.S. Environmental Protection Agency
309 Bradley Boulevard, Suite 115
Richland, Washington 99352

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EDMC

Dear Mr. Ceto:

DELAYS IN REMOVING K EAST BASIN SLUDGE

The purpose of this letter is to follow-up to previous informal discussions and to formally notify the U.S. Environmental Protection Agency (EPA) that the Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) Milestone M-34-34, "Complete Removal of K East Sludge," will not be completed by January 31, 2006, as committed. Unanticipated conditions of the sludge, debris, and basins have significantly impacted the sludge containerization activities. Specific unanticipated sludge, debris, and basin conditions include significantly higher quantities of hidden debris than planned; as found physical condition of the sludge (hard-packed and interspersed with significant quantities of debris) making collection much more difficult; and extremely persistent water clouding due to suspension of submicron particulates during sludge collection activities. These conditions required substantial changes to the sludge collection activities including multiple pumping systems to collect sludge simultaneously; use of underwater cameras to overcome poor visibility; improving sludge vacuum system end effectors; removing all fuel racks and significant quantity of debris from the basin to minimize interference to vacuuming sludge; and the design, manufacture, and delivery of special tooling to facilitate sludge collection in difficult basin conditions.

The U.S. Department of Energy (DOE) is evaluating all phases of the K Basins Closure Project to ensure that activities are properly scoped and estimated durations are realistic given actual basin conditions. This will be completed, including development of detailed costs and schedules in the next few weeks. DOE would like to work with EPA to define a path forward and evaluate the actual impacts to the Tri-Party Agreement milestones resulting from the revised schedules and that reflects our mutual objectives and facilities completion of this important work. DOE anticipates other interim milestones may be affected by these conditions, however, is committed to working with EPA to preserve the major milestone of all 100 Area remedial actions completed by the end of 2012.

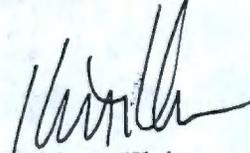
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Please contact me, or have your staff contact Matt McCormick, Assistant Manager for the Central Plateau, on (509) 373-9971 to begin the development of these strategies.

Sincerely



Keith A. Klein
Manager

AMCP:DEF

cc: G. Bohnee, NPT
L. D. Crass, FHI
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L. L. Fritz, FHI
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