



Department of Energy

Richland Operations Office
P.O. Box 550
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OCT 30 1991

START

91-ERB-198

Mr. Paul T. Day
Hanford Project Manager
U.S. Environmental Protection Agency
712 Swift Blvd., Suite 5
Richland, Washington 99352

Mr. Timothy L. Nord
Hanford Project Manager
State of Washington
Department of Ecology
Mail Stop PV-11
Olympia, Washington 98504-8711



Dear Messrs. Day and Nord:

COMPREHENSIVE ENVIRONMENTAL RESPONSE, COMPENSATION AND LIABILITY ACT (CERCLA)
PAST PRACTICE UNITS RESCOPED WORK PLANS, 100-KR-1 and 100-KR-4

Enclosed please find the subject rescoped Operable Unit (OU) work plans for the U.S. Environmental Protection Agency (EPA) and the State of Washington Department of Ecology (Ecology) review and comment. These work plans were rescoped in accordance with Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) milestones, the negotiated 100-Area Past Practice Strategy, rescoping meetings and comment resolution meetings. This transmittal meets the DOE Field Office, Richland (RL) commitment for Tri-Party Agreement milestones M-12-10a and M-12-11a.

The rescoped work plans provide individual OU schedules and a 100-Area integrated schedule in Chapter 6.0. These schedules were based on known resources (infrastructure and support systems) in fiscal years 1992 and 1993. Outyear resources are levelized to these baselines. Therefore, the schedules as presented may not show Remedial Investigation or Feasibility Study tasks that are either undefined at this time, or are resource limited. Per discussions with EPA and Ecology on September 19, 1991 and September 26, 1991, RL will work closely with the responsible regulatory agency to develop fully tasked schedules.

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Provided as Enclosure 2 is a review and work plan approval schedule (updated), which will be used by RL, to monitor and track the progress of this activity. Please note that this schedule increases the stipulated regulatory review period of this second submittal of these work plans as provided for in the Tri-Party Agreement, Paragraph 7.3, CERCLA Past Practice Unit Process. A 60-day EPA/Ecology review period and a 30-day public comment period is provided. Per informal agreement reached at the September 26, 1991, meeting, if comments are extensive, RL will request additional time to incorporate comments in preparation for initiating the public review process. Please provide your comments to RL by the dates indicated in the schedule.

Per paragraph 9.2.1 of the Tri-Party Agreement, the commenting agency shall refer to any pertinent sources of authority or reference upon which the comments are based and, upon request of the U.S. Department of Energy (DOE), the commenting agency shall provide a copy of the cited authority or reference. Please provide comments in this format to assist in timely resolution.

The rescoped work plans are Primary Documents, therefore the "draft" DOE-Headquarters (HQ) Document Review Protocol is applicable. However, these work plans have previously been submitted to DOE-HQ for review and comment, and, per agreement with DOE-HQ, EM-442 will notify the DOE-HQ Approval Authority that these documents have been released to both the EPA and Ecology, as well as to their technical review contractors, through the use of Fact Sheets.

In a good faith effort to meet the desired 30-month objective to reach interim Records of Decision, RL has authorized the Operations and Management Contractor, Westinghouse Hanford Company (WHC), to proceed with intrusive work scope, which actually began in October 1991. Additionally, to provide EPA and Ecology the opportunity to understand the detailed work scopes for all intrusive and non-intrusive activities, RL and WHC agreed to provide advance copies of "Statements of Work," at least two weeks prior to actually initiating new work scope activities. The original intent of following this procedure was to allow EPA and Ecology the opportunity to: 1) understand the details of work scope not currently provided in the OU Work Plans; and, 2) provide comments and approve the work scope informally via the Unit Manager's Meetings. RL will comply with this agreement in the future.

To insure that RL and WHC proceeds with intrusive characterization work using sound project management and change control procedures, and that all responsible agencies work toward reaching final approval of the subject work plans, the agreements made at the September 26, 1991, meeting will serve as the work scope and schedule baseline for controlling 100-Area intrusive investigations until such time as the OU work plans are formally approved.

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Messrs. Day and Nord
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Please address all comments and questions to Mr. J. D. Goodenough on (509) 376-7087 for all 100-Area OUs. To expedite comment resolution, please provide both a hard copy of comments as well as a computer diskette in WordPerfect (Copyright of WordPerfect Corp.) format (5.0 or 5.1). Regulatory agencies are requested to consolidate their comments through the lead agency.

Sincerely,



Steven H. Wisness
Hanford Project Manager

ERD:JDG

Enclosures:

1. Work Plans
2. Work Plan Approval Schedule

cc w/encls:

Administrative Record, H4-22

cc w/o encls:

- G. Hofer, EPA
- C. S. Polityka, DOI
- R. Robinson, IHS
- T. B. Veneziano, WHC
- R. D. Wojtasek, WHC

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100-AREA WORK PLAN APPROVAL SCHEDULE

Operable Unit	Issue Date	Regulator Review	Prep For Public Comment	Public Comment	Responses to Public Comments	Approval To Proceed
Time Period/Planned		60 Days	+ 15 Days	+ 30 Days	+ 30 Days	+ 15 Days
100-HR-1	30 Sep 91	2 Dec 91	20 Dec 91	21 Jan 92	21 Feb 92	9 Mar 92
Actual	1 Oct 91					
100-HR-3	30 Sep 91	2 Dec 91	20 Dec 91	21 Jan 92	21 Feb 92	9 Mar 92
Actual	1 Oct 91					
100-DR-1	30 Sep 91	2 Dec 91	20 Dec 91	21 Jan 92	21 Feb 92	9 Mar 92
Actual	1 Oct 91					
100-BC-1	30 Sep 91	2 Dec 91	20 Dec 91	21 Jan 92	21 Feb 92	9 Mar 92
Actual	1 Oct 91					
100-BC-5	30 Sep 91	2 Dec 91	20 Dec 91	21 Jan 92	21 Feb 92	9 Mar 92
Actual	1 Oct 91					
100-KR-1	31 Oct 91	30 Dec 91	15 Jan 92	14 Feb 92	16 Mar 92	31 Mar 92
Actual	30 Oct 91					
100-KR-4	31 Oct 91	30 Dec 91	15 Jan 92	14 Feb 92	16 Mar 92	31 Mar 92
Actual	30 Oct 91					
100-FR-1	2 Dec 91	31 Jan 92	18 Feb 92	19 Mar 92	20 Apr 92	5 May 92
Actual						
100-FR-3	2 Dec 91	31 Jan 92	18 Feb 92	19 Mar 92	20 Apr 92	5 May 92
Actual						
100-NR-1	31 Dec 91	29 Feb 92	12 Mar 92	14 Apr 92	14 May 92	28 May 92
Actual						
100-NR-2	31 Dec 91	29 Feb 92	12 Mar 92	14 Apr 92	14 May 92	28 May 92
Actual						

REF: Hanford Federal Facility Agreement and Consent Order (May 89), Figure 7.4.

Addresses - Letter Dated **OCT 30 1991**
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Subject: CERCLA PAST PRACTICE UNITS RESCOPEd WORK PLANS, 100-KR-1 AND 100-KR-4

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Enclosure 1 is the same as outgoing letter #9158062D. Enclosure 2 is the same as Enclosure 2 for Incoming letter #9105647. ldp, 6-7049

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