



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

1315 W. 4th Avenue • Kennewick, Washington 99336-6018 • (509) 735-7581

April 9, 2001

Mr. Clifford E. Clark, Acting Program Manager  
Office of Regulatory Liaison  
United States Department of Energy  
P.O. Box 550, MSIN: A5-15  
Richland, Washington 99352

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EDMC

Dear Mr. Clark:

Re: Review of the M-91-03 Project Management Plan (PMP) for Transuranic and Transuranic Mixed (TRU/TRUM) Waste

The Washington State Department of Ecology (Ecology) is in receipt of the PMP, entitled *M-91 Transuranic Waste Project Management Plan*, dated March 2001, submitted by the United States Department of Energy (USDOE) on March 29, 2001.

Milestone M-91-03 requires USDOE to "Submit Hanford site TRU/TRUM waste Project Management Plan (PMP) to Ecology pursuant to Agreement Section 11.5." This PMP submittal provides both new and useful information for review, but further specifics must be provided to comply with all elements of Section 11.5. This further information includes, but may not be limited to, the following:

1. Adding waste descriptions (based on waste profile sheets, indicating contents [e.g., debris, rags, lab packs, etc.]) and, where appropriate, the waste code designations for all individual waste streams tied to Waste Stream Process Flow Diagrams (Appendix B). Please note that this requirement does not replace, but may be satisfied in part through, M-26 Land Disposal Restrictions (LDR) reporting.
2. On the Process Flow Diagrams, describe each specific process to be used for each waste stream (e.g., size reduction, polychlorinated biphenyls (PCB) waste treatment, solidification, verification/certification, etc.) where processing will take place in a new/modified current M-91 facility.
3. Adding critical path details (i.e., implementing schedules) regarding retrieval capacity tied to budget baselines and activities planned to accomplish completion of post 1970 Contact Handled (CH) TRU/TRUM retrieval.

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4. Adding details (i.e., the number of shipments and/or quantity of waste to be shipped annually) regarding the Waste Receiving and Processing (WRAP) Facility shipping schedules for TRU/TRUM for years 2002-2013, including options for accelerating shipments to Waste Isolation Pilot Plant (WIPP).
5. An additional statement that reflects that the M-91 TRU/TRUM Waste Processing Activities (Attachment) represents critical path planning at the USDOE Hanford Waste Management Program level, which is technically feasible.

Further, initial review of the USDOE Change Request (Change Number Draft M-91-00-XX, dated April 4, 2001) reveals that it is lacking in enforceable commitments in several areas (e.g., for TRU/TRUM retrieval, for processing CH TRU/TRUM waste at WRAP and subsequent shipment to WIPP, etc.; and, in particular, the need to identify any waste description data gaps that must be filled pursuant to enforceable milestones) and will therefore require further discussion.

Ecology's review has determined this PMP document represents substantial effort and progress towards developing an integrated waste management strategy for TRU/TRUM; however, the previously listed requests for information will be needed to complete Ecology's review. Pursuant to Article VIII Resolution of Disputes, paragraph 30 of the Hanford Facility Agreement and Consent Order (Tri-Party Agreement) and to provide USDOE with time needed to develop and submit this additional information, Ecology will recommend to the IAMIT on April 24, 2001, that the current M-91-03 dispute resolution process at the Project Manager level be extended to May 22, 2001. If USDOE is not in agreement to extending the deadline, please contact Ecology within seven (7) days.

If you have any questions regarding this letter, please feel free to contact me at (509) 736-3022.

Sincerely,



Fred C. Jamison, Waste Management Project Manager  
Nuclear Waste Program

FCJ:sdb

cc: Dave Bartus, EPA  
Doug Sherwood, EPA  
Beth Bilson, USDOE  
Joel Hebdon, USDOE  
George Sanders, USDOE

Roger Bowman, FH  
Mary Lou Blazek, OOE  
Administrative Record: M-91-03