



**U.S. Department of Energy  
Hanford Site**

August 19, 2020

20-TF-0082

Mr. Jeffrey J. Lyon, Tank Systems Operations  
and Closure Project Manager  
Nuclear Waste Program  
Washington State  
Department of Ecology  
3100 Port of Benton Blvd.  
Richland, Washington 99354

Dear Mr. Lyon:

**RESPONSE TO 20-NWP-082 FROM THE WASHINGTON STATE DEPARTMENT OF  
ECOLOGY DECLINING LIQUID LEVELS IN SINGLE-SHELL TANK 241-T-111**

This letter responds to letter 20-NWP-082, dated May 22, 2020, expressing concerns related to declining liquid levels in single-shell tank (SST) T-111. Among other things, the Washington State Department of Ecology (Ecology) believes that the U.S. Department of Energy (DOE) needs to conduct a formal leak assessment, develop a response plan, and establish new Tri-Party Agreement milestones for future investigation and characterization work near the tank.

As Ecology is aware, all of Hanford's SSTs have been declared unfit for use and cannot readily be made compliant with current regulations. The challenges associated with SST T-111 are not new. DOE and Ecology have attempted to address these challenges through the Tri-Party Agreement processes, including most recently with renewed efforts to finalize revisions to primary document RPP-9937, Single-Shell Tank System Leak Detection and Monitoring Functions and Requirements Document – the document that addresses the leak detection, monitoring, and initial actions applicable to the SST system (which is subject to interim status standards during the pre-retrieval and post-retrieval of SSTs until closure).

While we disagree with several of Ecology's statements in the letter, in an attempt to avoid a protracted debate about the history and regulatory requirements for this tank, DOE has proposed that the parties attempt to resolve Ecology's concerns during ongoing discussions related to tank retrievals and closures in Holistic Negotiations. DOE believes this is the best forum to consider Ecology's specific concerns with tank T-111 within the context of the broader holistic mission, and where we can work together to identify mission priorities and achieve risk reduction to workers, the public, and the environment.

Mr. Jeffrey J. Lyon  
20-TF-0082

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August 19, 2020

If you have any questions, please contact me on (509) 376-3567.

Sincerely,

**Brian A.  
Harkins**

 Digitally signed by  
Brian A. Harkins  
Date: 2020.08.19  
13:43:59 -07'00'

Brian A. Harkins, Deputy Assistant Manager  
Tank Farms Project  
Office of River Protection

TF:BAH

cc: J. M. Alzheimer, Ecology  
M. W. Barnes, Ecology  
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