



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
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August 14, 2006

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EDMC

Mr. Roy J. Schepens, Manager
Office of River Protection
United States Department of Energy
P.O. Box 450, MSIN: H6-60
Richland, Washington 99352

Re: *Sampling and Analysis Plan for Residual Waste Solids in Tank 241-C-103*,
RPP-PLAN-29587, Rev. 0, released July 20, 2006

Dear Mr. Schepens:

The Department of Ecology requests that the Off Riser Sampling System (ORSS) be deployed as the primary sample method for the waste residues retained in Tank 241-C-103. We are concerned with the close proximity of the two risers (5 and 7) identified for sampling of Tank 241-C-103. We feel that sampling from these riser locations with the finger-trap method will not provide a true sample mean of the waste residual constituent concentrations. The ORSS will require only one deployment (Riser 7). It will ensure sample volume and randomness of the samples collected, as described in the *Single Shell Tank Component Closure Data Quality Objectives*, RPP-23403.

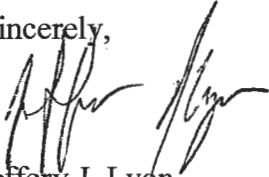
Ecology understands the ORSS has only been tested at the Cold Test Facility and there may be deployment and collection difficulties for this new sampling method. However, we feel that such difficulties could be overcome, and deploying the ORSS now would provide a cost-effective and representative sample of the residual waste in Tank 241-C-103. The finger-trap method should be used only as a back-up method.

We believe this is an urgent issue and want to meet with the appropriate USDOE project manager, or their designee, before you initiate your residual solids sampling effort. We would like to discuss the use of ORSS as the preferred sampling methodology and appropriate revisions to the *Sampling and Analysis Plan for Single-Shell Tank Component Closure*, RPP-PLAN-23827.

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If you have any questions, contact me at 509-372-7914 or Mike Barnes at 509-372-7927.

Sincerely,



Jeffery J. Lyon
Tank Waste Storage Project Manager
Nuclear Waste Program

MB/LAF:lkd

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