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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Mail Stop PV-11 • Olympia, Washington 98504-8711 • (206) 459-6000
January 3, 1992

Mr. James Goodenough
United States Department of Energy
P.O. Box 550, Mail Stop A6-95
Richland, Washington 99352



Re: 100-HR-1 Electrical Facilities Sampling

Dear Mr. Goodenough:

Ecology was informed in the December 17, 1991, Unit Managers Meeting that the United States Department of Energy (USDOE) disregarded Ecology's comments on the 100-HR-1 Electrical Facility Sampling effort. We are disappointed with the way USDOE handled this issue. Refusal to accept the lead regulatory comments will definitely hinder Ecology/USDOE relations.

The Past Practice Strategy resulted in the creation of "tertiary" documents referred to as "Descriptions of Work" (DOWs). USDOE accepted a significant amount of risk by agreeing to less detailed work plans (primary documents) and placing that detail in DOWs (tertiary documents). Based on results obtained through less stringent sampling and analytical protocols, Ecology may require the resampling of the 100-HR-1 Electrical Facilities.

You were informed during a telephone conversation with me on November 13, 1991, that Ecology would not approve the DOW without significant revision. I also recommended USDOE postpone the sampling effort until an approved DOW was available to direct field personnel. On November 25, 1991, Ecology transmitted formal comments on the electrical facilities DOW.

What assurances can USDOE give Ecology that future DOWs will contain adequate information to perform investigations? Does USDOE plan to respond to Ecology's November 25, 1991, comments?

Please respond to this letter by January 17, 1992.

Sincerely;

Richard B. Hibbard, P.E.
CERCLA Unit Engineer
Nuclear and Mixed Waste Management Program

cc: Doug Sherwood, EPA
Steve Wisness, USDOE
T.B. Veneziano, WHC
Larry Goldstein, Ecology
Darci Teel, Ecology

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Author: R. B. Hibbard, Ecology Addressee: J. D. Goodenough, RL Correspondence No.: Incoming 9200413

Subject: 100-HR-1 ELECTRICAL FACILITIES SAMPLING

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