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**Department of Energy**  
Richland Operations Office  
P.O. Box 550  
Richland, Washington 99352

FEB 06 1996

96-PCA-123

Mr. David L. Lundstrom  
200 Area Section Manager  
Nuclear Waste Program  
State of Washington  
Department of Ecology  
1315 West Fourth Avenue  
Kennewick, Washington 99336-6018

Dear Mr. Lundstrom:

**DANGEROUS WASTE COMPLIANCE CHECKLIST FOR THE 222-S LABORATORY**

The U.S. Department of Energy Richland Operations Office (RL) has received the January 31, 1996, letter from Ms. Laura Russell, same subject as above. In her letter Ms. Russell requested a response from RL by February 9, 1996. This letter is our response to her request.

RL certainly did not expect to receive such a letter because we have tried very hard to cooperate with State of Washington Department of Ecology (Ecology) on the development and implementation of the compliance checklist. We are under the impression that the form being used is a draft and that our comments/suggestions on changes to the form were solicited. Further, the copy of the form that was sent to Ecology clearly indicated that the actions requested had been completed by the 222-S Laboratory.

RL is very supportive of the compliance checklist concept and believes that it can simplify the technical assistance/inspection documentation for less complicated units at the Hanford Site. However, as was noted in the initial discussions with Ecology regarding the pilot test, the proposed checklist can be significantly improved by some small modifications.

The change RL initially suggested was the addition of language after a signature/initial block for the person receiving the form from the Ecology inspector, which indicates that the signature only acknowledges receipt and does not constitute an admission of noncompliance. We understand this was the intent of the signature block and the addition of this language avoids any ambiguity. RL has expressed the need for these changes to the Ecology staff and has recommended the appropriate changes be made to the checklist before it is finalized.



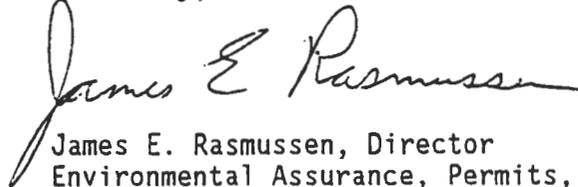
Mr. David L. Lundstrom  
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Our staff would like to continue to discuss with Ecology staff to resolve these issues before the form becomes formally effective. Should you have any questions or require additional information, please contact Mr. Alex E. Teimouri on (509) 376-6222.

Sincerely,



James E. Rasmussen, Director  
Environmental Assurance, Permits,  
and Policy Division

EAP:AET

cc: W. T. Dixon, WHC



