



Oregon

Theodore R. Kulongoski, Governor



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February 26, 2004

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Larry Romine
U.S. Department of Energy
Richland Operations Office
P.O. Box 550, MS A6-33
Richland, WA 99352

Subject: Review of the "Engineering Evaluation / Cost Analysis (EE/CA) for the 224-T Plutonium Concentration Facility," DOE/RL-2003-62, Revision 1, January 21, 2004.

Dear Mr. Romine:

We appreciate the opportunity to provide comments on the proposed action. Our recommendations on the 224-T facility EE/CA mirror those for the 224-B facility EE/CA that you recently issued. Both facilities were operated similarly, and have similar issues.

We believe the EE/CA provides a reasonable path forward for the 224-T facility. You have proposed alternative 3 (decontamination and decommissioning to slab). We believe, however, that alternative 4 (complete removal to one meter below the structure) is a better choice. The projected costs between the two alternatives differ by less than 12 percent. This is within the error margin for the estimates. This also does not account for costs that will be incurred later when DOE finishes remediation of the area. If the work is not completed now, DOE will bear the increased costs for remobilizing to do the work later. This will likely increase the total cost at completion for alternative 3, possibly making alternative 4 the less expensive of the two. We urge you to reconsider and to select alternative 4.

Just as with the 224-B EE/CA, there is an error on page 4-1 of this EE/CA. In the last full paragraph, the document asserts that the Environmental Restoration Disposal Facility (ERDF) is eligible to receive Resource Conservation and Recovery Act (RCRA) waste. It is not. ERDF includes a liner similar to those used in RCRA facilities. This makes ERDF a lined CERCLA waste facility, not a RCRA waste facility.

ERDF is not subject to the State regulatory requirements and accordingly is not licensed or authorized to accept RCRA wastes. The impact of this is minimal, as the mixed wastes can be disposed in the RCRA licensed mixed waste disposal facility at Hanford.

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We previously requested clarification on the legal definition of transuranic waste in our comments on the 232-Z EE/CA, noting that the DOE Orders related to transuranic waste were not promulgated. We continue to await your reply on that question. The 224-B, 232-Z and 224-T EE/CAs should all be modified to reflect that answer.

If you have questions regarding our comments, please contact Dirk Dunning at the Oregon Department of Energy (503) 378-3187.

Sincerely,



Ken Niles
Assistant Director

Cc:

Nicholas Ceto, EPA Program Manager
Michael A. Wilson, Ecology Nuclear Waste Program Manager
Todd Martin, Chair, Hanford Advisory Board
Stuart Harris, CTUIR Program Manager
Russell Jim, Program Manager Yakama Indian Nation
Patrick Sobotta, Nez Perce Tribe