



0074316

STATE OF WASHINGTON

DEPARTMENT OF ECOLOGY

P.O. Box 47600 • Olympia, Washington 98504-7600
(360) 407-6000 • TDD Only (Hearing Impaired) (360) 407-6006

November 26, 1997

Mr. George Sanders
U.S. Department of Energy
P.O. Box 550 – MS: A5-15
Richland, WA 99352

RECEIVED
NOV 12 2007

EDMC

Dear Mr. Sanders:

Re: Ecology Concurrence with DOE Recommendation on New Tanks Under M-46-01D

Ecology has completed review of the latest version of the Operational Waste Volume Projection (OWVP, HNF-SD-WM-ER-029, Rev. 23). We concur with the recommendation from DOE that the decision on the need to build new tank storage capacity be delayed until next year. There are a number of critical items facing the Tank Waste Remediation System (TWRS) this year, and the outcome of those decisions will have a significant impact on the OWVP.

We must note, however, that the assumptions in the OWVP for the Tri-Party Agreement compliant case increase the risks to the TWRS program on a variety of fronts. There are many assumptions, too numerous to go into here, that are unlikely to occur, or that are not likely to occur simultaneously. Even with these assumptions the OWVP shows that DOE will run out of tank storage space in Fiscal Year 2004.

This becomes even more distressing in light of the changes currently occurring within TWRS. For example, both the retrieval of solids from tank C-106 and the removal of pump-able liquids from SSTs is being delayed. While this provides some near-term relief on tank storage demands, it will exacerbate the problem in the early 2000s, when DST waste pretreatment, C-106 solids storage, and interim stabilization liquids are impacting the DSTs.

In closing, it is clear from the information provided by the OWVP that the DOE should seriously consider the need to build additional DST capacity in the near term. The degree to which DOE is able to address the uncertainties in the OWVP, and resolve some of the issues presented therein, will be deciding factors in whether the recommendation in the

RECEIVED

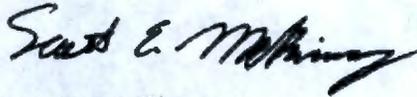
DEC 08 1997

DOE-RL/RLCC

Mr. George Sanders
Page 2
November 26, 1997

fall of 1998 is to build new DST capacity or not. It is clear to Ecology that continuing on the present course will require a decision in 1998 to build new tanks.

Sincerely,



Scott E. McKinney
Unit Supervisor
Regulatory and Technical Support
Nuclear Waste Program

cc: Owen Kramer, LHMC
L. Arnold, FDH
T. Umek, FDH
Brad Erlandson, LHMC
Donna Powaukee, Nez Perce
Russell Jim, YIN
J.R. Wilkinson, CTUIR