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## Department of Energy

Richland Operations Office  
P.O. Box 550  
Richland, Washington 99352

DEC 17 1991

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91-TPA-206

Mr. Paul T. Day  
Hanford Project Manager  
U. S. Environmental Protection Agency  
Region 10  
712 Swift Boulevard, Suite 5  
Richland, Washington 99352

Mr. Timothy L. Nord  
Hanford Project Manager  
State of Washington  
Department of Ecology  
Mail Stop PV-11  
Olympia, Washington 99504-8711



Dear Messrs. Day and Nord:

INTERIM STABILIZATION OF SINGLE-SHELL TANKS, MILESTONE M-05-00, CHANGE REQUEST PACKAGE M-05-91-01

Reference (1) Letter, J. D. Wagoner, RL, to C. O. Gregoire, Ecology/D. A. Rasmussen, EPA, Interim Stabilization of Single-Shell Tanks (Milestone M-05-00), dated September 9, 1991. 16093

(2) Letter, T. L. Nord, Ecology, to S. H. Wisness, TPA, Interim Stabilization Milestone Changes for Fiscal Years 1991 - 1996 (Change Number M-05-91-01), dated October 2, 1991. 16648

(3) Letter, S. H. Wisness, TPA, to T. L. Nord, Ecology/P. T. Day, EPA, Interim Stabilization Milestones, Dispute Resolution, dated October 7, 1991. 16729

(4) Letter, T. L. Nord, Ecology, to S. H. Wisness, TPA, Interim Stabilization Milestones, Dispute Resolution, dated November 4, 1991. ✓

Efforts continue within Tank Farms to resolve facility and safety issues and concerns regarding single-shell tank stabilization in order to progress towards completing the requirements of the Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) Milestone M-05-00. U.S. Department of Energy, Richland Field Office (RL) continues performing to this milestone in good faith by having five single-shell tanks in the stabilization process at this time. RL will make every effort towards the start of pumping of the last eleven single-shell tanks that are available for pumping (non-watch-list tanks). Engineering activities leading to release of the 28 watch list tanks to "available for pumping" status are continuing. Yet, difficulties remain and the full ability to meet the requirements of the Major and Interim Milestones (M-05-00) are not fully known. Therefore, RL withdraws from your consideration the Tri-Party Agreement Class II Change Package M-05-91-01,

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Interim Stabilization Milestone Changes for Fiscal Years 1991 - 1996, and terminates Dispute Resolution initiated by reference (3).

The aggressive schedule for stabilization of these single-shell tanks established during the early days of the Tri-Party Agreement, and modified during negotiations in May 1991, has always been considered challenging. The conditions in the tank farms (unknown during the establishment of the stabilization schedules), coupled with the continuing safety concerns, impede this aggressive schedule. Obviously, RL's understanding of conditions and information must be improved prior to establishing future commitments.

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RL will submit a new Tri-Party Agreement Change Package for your consideration in February 1992. This new change package will reflect the best information available. It will provide a new schedule for completing single-shell tank stabilization for those eleven tanks that are available for pumping but not currently being pumped. A separate change package will be submitted next summer for the remaining twenty-eight tanks which are currently listed as being on the watch-list and are not available for pumping. The schedule for submittal of these change packages is consistent with the interim milestones proposed in the reference (1) change package.

As you recall from reference (1), we specified three issues impacting our stabilization activities. RL is reiterating its position that conditions exist which preclude an ability to meet the Fiscal Year 1992 stabilization milestone (Stabilize nine SSTs by September 1992). The conditions within the remaining farms are much worse than the problems that were encountered in preparing the "C" farm for stabilization pumping. While these difficulties are not insurmountable, they will significantly impede stabilization and to compare them with the situation found at the "C" farm is not valid. We continue to progress in gathering the data necessary to clearly delineate this project's scope so that what can be accomplished for the upcoming non-watch-list tank change package can be specified. Our best projection at this time is that the maximum quantity of tanks to be stabilized by September 1992, is one tank (based on our most current pumping duration estimates). We will finalize these projections over the next two months, leading to discussions with you in February 1992. When we discuss this issue with you in February, we do not expect timeliness of notification to be an issue.

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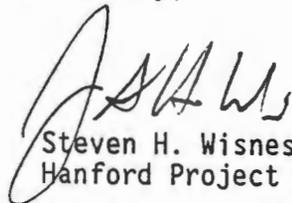
Messrs. Day and Nord  
91-TPA-206

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DEC 17 1991

Should you have any questions regarding this, please contact either myself at (509) 376-6798, or Mr. Ron Gerton at (509) 376-9106.

Sincerely,

  
Steven H. Wisness  
Hanford Project Manager

EAP:JER

cc: T. B. Veneziano, WHC

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# CORRESPONDENCE DISTRIBUTION COVERSHEET

Author: Steven H. Wisness, RL  
Addressee: Paul T. Day, EPA  
                  Timothy L. Nord, Ecology  
Correspondence No.: Incoming: 9106214

Subject: INTERIM STABILIZATION OF SINGLE-SHELL TANKS, MILESTONE M-05-00, CHANGE REQUEST PACKAGE M-05-91-01

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