



OFFICE OF RIVER PROTECTION

P.O. Box 450, MSIN H6-60
Richland, Washington 99352

JAN 17 2019

19-TF-0001

Mr. Jeffrey J. Lyon, Tank Systems Operations
and Closure Project Manager
Nuclear Waste Program
Washington State Department of Ecology
3100 Port of Benton
Richland, Washington 99354

Mr. Lyon:

**RECIPT OF COMMENTS ON THE APPENDIX I PERFORMANCE ASSESSMENT FOR
WASTE MANAGEMENT AREA A/AX**

Reference: Ecology letter from J. Lyon to J. Bovier, ORP, "Structure of the Appendix I
Performance Assessment for Waste Management Area A/AX,"
18-NWP-176, dated November 8, 2018.

The U.S. Department of Energy (DOE) acknowledges receipt of Ecology's letter 18-NWP-176 (Reference). DOE looks forward to starting discussions regarding the I Performance Assessment (IPA) for Waste Management Area (WMA) A/AX with the Washington State Department of Ecology.

DOE intends to keep the DOE O 435.1 Performance Assessment (PA) volume of the IPA separated from the other three volumes (Past Leaks, Resource Conservation and Recovery Act Closure, Baseline Risk Assessment) for the WMA A/AX IPA.

A qualitative discussion of the impact of upgradient sources of groundwater contamination for any individual WMA may be appropriate after the Hanford Composite Analysis (CA) and planned Cumulative Impact Evaluation (CIE) are completed. Per DOE O 435.1 and its implementing Manual and Guide, radionuclide contributions to groundwater that are attributed to upgradient sources are not included in the DOE O 435.1 PA evaluation against the performance objectives established for that Low Level Waste facility. The collective radionuclide contribution to groundwater from multiple Low Level Waste facilities are evaluated in the CA or CIE at a different point of compliance. DOE plans to use the Tank Closure and Waste Management Environmental Impact Statement cumulative impact analysis information in the WMA A/AX IPA.

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If you have any questions, please contact me; or your staff may contact Jan B. Bovier, Tank Farms Closure Program Manager, at (509) 376-9630



Robert G. Hastings, Assistant Manager
Tank Farms Project

TF:JJB

cc: M. Johnson, CTUIR
J. Alzheimer, Ecology
M. Barnes, Ecology
D.A. Delistraty, Ecology
D. Goswami, Ecology
T. Howell, Ecology
J. Lyon, Ecology
J. Price, Ecology
E. Rochette, Ecology
M. Skorska, Ecology
M. Walmsley, Ecology
C. Whalen, Ecology
J. Yokel, Ecology
D.R. Einan, EPA
S. Leckband, HAB
J.K. Perry, MSA
M.J. Turner, MSA
J. Bell, NPT
K. Niles, ODOE
M.P. Bergeron, WRPS
R.A. Hiergesell, WRPS
C.L. Tabor, WRPS
P.L. Rutland, WRPS

A. Buck, Wanapan
L. Contreras, YN
Administrative Record
Environmental Portal
Hanford Facility Operating Record
MSA Correspondence Control
NWP Central File
WRPS Correspondence Control