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STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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March 15, 2004

Mr. Keith A. Klein, Manager  
Richland Operations Office  
United States Department of Energy  
P.O. Box 550, MSIN A7-50  
Richland, Washington 99352

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EDMC

Mr. David Van Leuven  
Fluor Hanford Inc.  
P.O. Box 1000, MSIN H5-20  
Richland, Washington 99352

Dear Messrs. Klein and Van Leuven:

Re: M-26 Inspection at the 224-T facility on January 14, 2004.

Thank you for the assistance of the United States Department of Energy (USDOE) and Fluor Hanford (FH) personnel during the Washington State Department of Ecology's (Ecology) recent inspection of 224-T.

This inspection included a review of the completed Storage Assessment and Data Gap Plan submitted to Ecology for the 224-T hot cells. These deliverables are listed in the Calendar Year 2002 Hanford Site Mixed Waste Land Disposal Restrictions Report (LDR Report), Potential Mixed Waste Table (Table C-2).

No violations were noted; however, several concerns are described below. Ecology issues concerns to notify owners/operators of conditions that if not improved, could evolve into violations.

CONCERNS:

One of the goals of the Potential Mixed Waste Table in the LDR Report is to describe a path forward towards eventual LDR compliance and subsequent disposal of potential wastes on site. Part of this path forward includes a storage assessment and data gap plan. Though the assessment has been performed and the documents created, it is not evident that they are thorough enough and are being used to meet the goals of M26.

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1. The storage assessment and data gap plan lacked adequate thoroughness to address the connection between the 224-T hot cells and T-plant, and investigate the possibility of water backing up into T-plant.
2. There are currently no plans or funding to perform the work necessary to fill data gaps such as visually verifying tank contents.
3. There are currently no plans or funding to deal with problems discovered in the assessment through actions such as fixing sinkholes or investigating the source of the water intrusion into 224-T, C cell.
4. A draft Engineering Evaluation/Cost Analysis (EE/CA) for the 224-T building was reviewed by Ecology and found a need for these issues to be addressed, and funding issues to be resolved (See February 26, 2004 Memo: "Review of Engineering Evaluation/Cost Analysis for the 224-T Plutonium Concentration Facility, DOE/RL-2003-62, Revision 1").

Do not hesitate to contact me at (509) 736-3028 if you have any questions regarding this letter.

Sincerely,



Eric Van Mason  
Compliance Inspector  
Nuclear Waste Program

EVM:nc

cc: Cliff Clark, USDOE/RL  
Greg LeBaron, FH  
Tony Miskho, FH  
Todd Martin, HAB  
Stuart Harris, CTUIR  
Pat Sobotta, NPT  
Russell Jim, YN  
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Environmental Portal  
Administrative Record: TRUSAF and T-Plant