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DEPARTMENT OF ECOLOGY

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March 6, 1992



Steven H. Wisness
Hanford Project Manager
U.S. Department of Energy
P.O. Box 550
Richland, Washington 99352

Re: Comments on the Draft Integrated Sampling and Analysis Plan for Samples Measuring > 10 mRem/Hour

Dear Mr. Wisness:

We received the draft integrated plan on February 11, 1992, in fulfillment of the January, 1992, Target Milestone M-10-05-T1. However, we are concerned that the overall message of the integrated plan is that USDOE will fail to meet its current and future obligations due to a lack of capacity for analytical laboratories capable of handling samples over 10 mR/hr. Specific comments regarding the integrated plan are enclosed.

In sum, the *Integrated Sampling and Analysis Plan* seems to be an amalgamation of portions of other reports without clearly integrating the various parts and sections to form a usable, cohesive product. Even after identifying a major shortfall in analytical capacity this document doesn't recommend actions or additional efforts to verify the problem. And while some recommendations on how to address this issue are made, some are not acceptable and overall they are not sufficient to correct the problem. Although the letter of the target milestone has been met, the result doesn't help us in terms of ensuring that project schedules can be met and will not serve to provide a sufficient basis supporting future milestone changes.



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These comments were prepared in conjunction with EPA. If you have any questions, please contact Ms. Megan Lerchen of my staff at (206) 438-3089 or Mr. Doug Sherwood of the EPA Richland Field Office at (509) 376-9529.

Sincerely,



David B. Jansen, P.E.
Hanford Project Manager

DJ/ML
Enclosure

cc: J. Clark - USDOE, Richland
P. Day - EPA, Richland
D. Duncan - EPA, Seattle
D. Sherwood - EPA, Richland
D. Nylander - Ecology, Kennewick
M. Lerchen - Ecology, Olympia
T. Veneziano - Administrative Record

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COMMENTS ON THE DRAFT INTEGRATED
SAMPLING AND ANALYSIS PLAN FOR
SAMPLES MEASURING > 10 mR/hr
WHC-EP-0533

March 6, 1992

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|----|-------------|--|
| 1. | 9 | Section 2.1, Analytical Laboratories, in the second paragraph of this section, various additional projects and programs are described which are supported by PNL's 325 Laboratory and WHC's 222-S Laboratory. However, the plan does not give a projection or estimate of the laboratory throughput required for these projects. An estimate of the analytical requirements of these other programs is needed to determine the full extent of the shortfall and if redistribution of these or other projects would significantly improve the throughput for greater than 10 mR/hr samples. |
| 2. | 13 | Part 3.0, Prioritization Criteria, Priority 2 is to meet the terms of formal agreements between DOE, and local, State and Federal agencies but excludes permits. This is not acceptable, the terms of permits must be met. It seems clear that with the potential for criminal and civil liability, permits should be incorporated in Priority 2 (see Section 3.1.2, Priority Subcategory 2A). |
| 3. | 21 | Part 4.0, Integrated Schedule, the plan states that the integrated sampling schedule is presented in Table 4-1. However, an examination of Table 4-1 shows that the table actually gives the projected program needs and is not a schedule. In addition, there is no indication of whether this "schedule" incorporates the predicted laboratory capability shortfall nor what program(s) will take precedence in the allocation of scarce resources. Finally, no indication is given of which, if any, of the AEU's listed meet multiple program needs. |
| 4. | 25 | Part 5.0, Actions Necessary to Support Milestone M-10-00. In Section 5.1, Analytical Laboratories, it may be inferred that Milestone M-10-00 will be missed unless the upgrades described in Section 2.1 are funded and implemented ahead of the current schedule in accordance with dates in Table 5-1. If these dates are met, then the laboratory throughput is projected to be as depicted in Figure 5-1. However, an examination of Figure 5-1 shows that even with the accelerated upgrades, the laboratories will not meet the projected needs until almost the year 2000. Furthermore, the language in Part 5.0 suggests that only Milestone M-10-00 is in jeopardy due to the shortfall in > 10 mR/hr analytical capability. The title and part are both misleading because if the laboratory capacity shortfall is as dramatic as projected in the plan, many agreement milestones will be impacted, not just M-10-00. |

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- 5. 29 Section 6.2, Tank Grouping, ~~the text discusses~~ grouping tanks together based on process knowledge. Limited overall sampling and analysis will then be performed on each group. Given the record for accurate knowledge of non-radioactive tank constituent inventories, this is not an acceptable alternative.
- 6. 30 Section 6.6, New Laboratory, costs are cited for construction of a new laboratory with a mission similar to the 222-S and 325 laboratories. Please forward copies of the reports of the studies in which these costs were developed to both EPA and Ecology.
- 7. 31 There appears to be mistakes in the references; for example, the most current revision of the *Dangerous Waste Regulations*, Chapter 173-303 WAC, is April, 1991.
- 8. 37 From the description of the roles and responsibilities of Westinghouse Hanford Company (WHC) and Battelle Memorial Institute Pacific Northwest Laboratory (PNL), it does not seem as though there is sufficient coordination between the two laboratory operators. For example, it is not clear whether HEIS will be in place at PNL as well as at WHC.
- 9. 53 Section B.5.1, Program Description, it is stated that RCRA and CERCLA have been integrated at the Hanford Site so that they are essentially the same. Although it is a goal under the *Hanford Federal Facility Agreement and Consent Order* to integrate the two programs, this has not been finalized. More particularly, it would not be advisable to proceed as though the programs have been integrated without approval from the appropriate authorities at both EPA and Ecology. See enclosure.

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Subject: COMMENTS ON THE DRAFT INTEGRATED SAMPLING AND ANALYSIS PLAN FOR SAMPLES MEASUREMENTS > 10 MREM/HOUR

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