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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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May 21, 1996

Mr. James McClusky, Director
TWRS Waste Storage Division
P.O. Box 550
Richland, WA 99352



Dear Mr. McClusky:

Re: C-103 Floating Organic Layer

In June 1995, the Washington State Department of Ecology (Ecology) sent a letter to the U.S. Department of Energy (USDOE) concerning issues dealing with the safe disposition of the floating organic layer in tank C-103. At a subsequent Chemical Reaction Sub-Technical Advisory Panel (CRS) meeting, an agreement was made between Ron Gerton, USDOE acting director for the Waste Storage Division, Dr. Charlie O'Dell of USDOE Headquarters, and Ecology concerning a path for resolution of these concerns. The agreement was made to obtain an engineering study of the alternatives, to review this study and select a technically feasible strategy to dispose of the organic material, and to bring this strategy in front of the CRS for their review and comment. Based upon the review of the CRS, USDOE and Ecology would agree to a final disposition plan for the floating organic layer.

At presentations made to the CRS and the Defense Nuclear Facility Safety Board (DNFSB), at which Ecology participated, updates were provided on the progress of this agreement. Although preliminary, Westinghouse Hanford Company (WHC) informed Ecology during these meetings the preferred alternative would be to skim the organic layer from C-103 before interim stabilization and transport the organics to an off-site incinerator for disposal. Ecology concurs with this alternative as it feels removal and disposal of the organic material is the best method to deal with the long-term impacts of this material.

Recently, however, it has come to Ecology's attention that the previously proposed preferred alternative may not, in fact, be the recommendation of WHC to USDOE. Indications are the recommendation may be to interim stabilize the tank without removing the organic layer. Ecology has serious concerns with this alternative as expressed in its letter of June 1995. Ecology feels such a decision is not sufficiently protective of human health and safety, and is contrary to the long-term goal of retrieving and disposing of the waste stored in the 177 high-level radioactive tanks. Therefore, Ecology wishes to reiterate its commitment to obtaining an unbiased technical

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review of the preferred alternative for dealing with the floating organic layer in C-103 and that the resolution of this issue be consistent with the long-term safe storage, treatment, and disposal of the tank waste.

Ecology, therefore, requests formal notification of the recommendation from WHC to USDOE on resolution of this issue and notification of when this issue will be brought before the CRS for technical review. Upon completion of the technical review, Ecology will inform USDOE of its position on this matter.

If you have any questions on this topic, please contact me at (509) 736-3018

Sincerely,



Dr. Alex Stone
Safety Project Manager
Nuclear Waste Program

AS:mf

cc: Ron Gerton, USDOE
Charlie O'Dell, USDOE
Maureen Honimueller, USDOE
Mary Jarvis, USDOE
Roger Bacon, WHC
Billy Hudson, Chemical Reaction Sub-Technical Advisory Panel
Ralph Arcuro, DNFSB
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