



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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June 5, 2020

20-NWP-099

Brian T. Vance, Manager
Office of River Protection
United States Department of Energy
PO Box 450, MSIN: H6-60
Richland, Washington 99352

Re: Department of Ecology Response to Letter 20-TF-0012, dated April 8, 2020, “U.S. Department of Energy, Office of River Protection Response to Letter 20-NWP-057, Tank AX-102 Sampling Objectives for Retrieval Decisions”

References: See page 2

Dear Brian T. Vance:

The Department of Ecology (Ecology) appreciates the United States Department of Energy (USDOE) efforts to be collaborative and transparent during the planning process for sampling Tank AX-102. Following the collaboration, Ecology expects that we will reach agreement with USDOE on the details of the applicable Tank Sampling and Analysis Plan. The purpose of our letter 20-NWP-0057 (Reference 1) was to communicate clear expectations up front and to ensure USDOE was aware of our concerns.

The circumstances and waste characteristics associated with Waste Management Area (WMA) A/AX retrievals are substantially different than those associated with WMA C, and the concerns we expressed in letter 20-NWP-057 remain unresolved. If USDOE would like to resolve the issues identified in that letter, Ecology would welcome that effort.

Any agreements that result from this collaboration will be formally documented in a letter from Ecology. Until Ecology issues such a letter, these issues remain unresolved. Failure to resolve these issues will increase the risk that the upcoming sampling event will result in data or evaluations that will not meet our expectations.

Also, Ecology has reviewed the *Tank Sampling and Analysis Plan for Residual Solid Waste in Tank 241-AX-102* (RPP-PLAN-63800 Revision 0) we received on April 13, 2020 (Reference 2). The concerns and expectations we identified in letter 20-NWP-057 remain. Ecology expects the AX-102 sampling will provide adequate information on the solids and the remaining saltcake to support a third retrieval technology evaluation.

If you have any questions or concerns, please contact me at alex.smith@ecy.wa.gov or (509) 372-7905, or Jeff Lyon, Tank Systems Operation & Closure Project Manager, at jeff.lyon@ecy.wa.gov or (509) 372-7914.

Sincerely,

Smith, Alex
(ECY)
Alexandra K. Smith
Program Manager
Nuclear Waste Program

Digitally signed by
Smith, Alex (ECY)
Date: 2020.06.05
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References:

1. Letter 20-NWP-057, dated March 18, 2020, "Tank AX-102 Sampling Objectives for Retrieval Decisions"
2. Document RPP-PLAN-63800, dated March 26, 2020, Tank Sampling and Analysis Plan for Residual Solid Waste in Tank 241-AX-102, Revision 0

cc electronic:

Dave Einan, USEPA
Robert Hastings, USDOE-ORP
Jeffrey Rambo, USDOE-ORP
Doug Greenwell, WRPS
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