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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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February 10, 1994

Mr. Steve H. Wisness
Hanford Project Manager
United States Department Of Energy
P.O Box 550 MSIN: A5-15
Richland, WA 99352



Dear Mr. Wisness:

The Washington State Department of Ecology (Ecology), with concurrence from United States Department of Energy's (USDOE) 100 Area Unit Manager and the United States Environmental Protection Agency (EPA), is currently proposing that the 100-DR-2 operable unit (OU) and the 100-DR-3 OU be combined to create a single OU (similar to the 100-BC consolidation). This proposed consolidation will not effect the current 100-DR-1 and 100-HR-3 operable unit status.

The intent of redefining the current OU boundaries is to reduce the administrative cost required by maintaining two separate OUs and to provide more effective regulatory oversight of the 100-D/DR cleanup. Combining the two OUs would allow for a reduction in the number of documents needed to produce a defensible Record Of Decision (ROD), and also allow for the removal of 100-DR-3 OU from the Hanford Federal Facility Agreement and Consent Order. Only a single ROD would be necessary to facilitate a final cleanup action for the combined OUs. Overall this consolidation should lead to a much more efficient cleanup of 100-DR-2 and 100-DR-3.

The work plan would need to incorporate the scope of work for both the 100-DR-2 OU and the 100-DR-3 OU. The agreed upon work plan would then go out for public review. Additionally, Ecology is proposing that the existing 100-DR-2 work plan be modified by addendum to include the substantive portions of both the Limited Field Investigation (LFI) and Qualitative Risk Assessment (QRA) reports. The 100-DR-2/DR-3 LFI and QRA review cycles should be completed by the time the work plan returns from public review. All the information would then be combined into the work plan immediately following the public review process and final comment disposition for the work plan. Therefore, the single, final document submitted to the administrative record and to the public would include all the work scope, LFI, and QRA information for the combined OUs. This single document combined with the Focused Feasibility Study should provide the information necessary to create a defensible ROD.

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There is also potential for a consolidation of this nature to allow for the acceleration of the proposed work schedule.

Ecology is committed to supporting USDOE in achieving more efficient and effective cleanups, and looks forward to the furtherance of this project.

If you have any questions, please contact me at (509) 736-3012.

Sincerely,



Ted Wooley
Unit Manager
Nuclear & Mixed Waste Management Program

TW:mf

cc: Glenn Goldberg, USDOE
Paul Beaver, EPA
Administrative Record (100-DR-2 and 100-DR-3 Operable Units)

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