



0075083

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

3100 Port of Benton Blvd • Richland, WA 99352 • (509) 372-7950

January 7, 2008

RECEIVED
JAN 09 2008
EDMC

Ms. Shirley J. Olinger, Manager
Office of River Protection
United States Department of Energy
P.O. Box 450, MSIN: H6-60
Richland, Washington 99352

Re: Department of Ecology Letter of Completion for Retrieval Data Reports (RDR) for
Single-Shell Tanks (SST) 241-C-103, 241-C-201, 241-C-202, 241-C-203, and 241-C-204

References: See page 3

Dear Ms. Olinger:

The Department of Ecology provided informal comments via e-mail for the referenced RDRs and resolved most of the issues associated with these RDRs. We appreciate the opportunity to discuss our suggestions for revising the strontium-90 values originally submitted in the RDR for Tank 241-C-203. Based on our review of the RDRs:

- We accept the method used to derive waste inventory for Tank 241-C-201 and the waste inventory given in the RDR.
- We accept the waste inventory given in the RDR for Tank 241-C-203 with changes in the inventory for strontium-90 agreed to at the December 5, 2007, meeting.
- We accept the waste inventory given in the RDRs for Tanks 241-C-103, 241-C-202, and 241-C-204.
- We agree that all the referenced SSTs have been retrieved to the limit of waste retrieval technology capability, and that the waste retrieval criteria established by Milestones M-45-00 and M-45-00B have been met for SSTs 241-C-103, 241-C-201, 241-C-202, 241-C-203, and 241-C-204.



007208
Ms. Shirley J. Olinger
January 7, 2008
Page 2

While information in the RDRs is sufficient to support decisions regarding retrieval, additional information is needed to support closure decisions. We identified the following areas where information currently provided in the RDRs is not sufficient to support closure decisions:

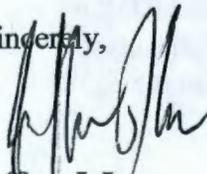
- We have not accepted the method used to derive the potential risk to human health.
- The data provided in the RDRs is not sufficient to conclude that leaks have not occurred during SST retrievals. The uncertainty in measurements used for leak detection and monitoring during retrieval (e.g., material balance calculations, liquid level measurements, pre-retrieval waste volumes from the Best Basis Inventory, and other measurements) needs to be better defined and understood before making a determination that no leaks occurred during SST retrievals.

Ecology expects that these issues will be resolved in RDRs, Tank Waste Retrieval Work Plans, and closure planning documents being written currently or in the future.

We appreciate the progress made for retrieving tanks; however, we note that Milestone M-45-00B has been missed. We are evaluating enforcement actions regarding this missed milestone.

If there are questions, contact me at 509-372-7914.

Sincerely,



Jeffery J. Lyon
Tank Waste Storage Project Manager
Nuclear Waste Program

nm/aa

cc: Delmar Noyes, USDOE-ORP
Roger Quintero, USDOE-ORP
Moses Jaraysi, CH2M
Stuart Harris, CTUIR
Gabriel Bohnee, NPT
Russell Jim, YN
Susan Leckband, HAB
Ken Niles, ODOE
Administrative Record: SST 241-C 5-2-4
Environmental Portal
USDOE-ORP Correspondence Control

Ms. Shirley J. Olinger
January 7, 2008
Page 3

References:

1. Letter 06-TPD-005, dated January 18, 2006, from R. J. Schepens, USDOE, to J. Hedges, Ecology, "Submittal of Demonstration Retrieval Data Report (RDR) for Single-Shell Tank C-203, RPP-RPT-26475, Rev. 1"
2. Letter 06-TPD-051, dated July 31, 2006, from R. J. Schepens, USDOE, to J. Hedges, Ecology, "Submittal of Demonstration Retrieval Data Report (RDR) for Single-Shell Tank C-202, RPP-RPT-29095, Rev. 0" 0070272
3. Letter 06-TPD-071, dated November 2, 2006, from R. J. Schepens, USDOE, to J. Hedges, Ecology, "Submittal of the Demonstration Retrieval Data Report (RDR) for Single-Shell Tank 241-C-201, RPP-RPT-30181, Revision 0A" 0071518
4. Letter 07-TPD-026, dated May 21, 2007, from S. J. Olinger, USDOE, to J. Hedges, Ecology, "Submittal of Retrieval Data Report (RDR) for Single-Shell Tank 241-C-103, RPP-RPT-33060, Revision 0" 0072939
5. Letter 07-TPD-043, dated August 9, 2007, from S. J. Olinger, USDOE, to J. A. Hedges, Ecology, "Submittal of Demonstration Retrieval Data Report (RDR) for Single-Shell Tank 241-C-204, RPP-RPT-34062, Revision 0" 0073718