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STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

1315 W. 4th Avenue • Kennewick, Washington 99336-6018 • (509) 735-7581

December 18, 2002

Mr. Joel Hebdon, Director  
Regulatory Compliance and Analysis Division  
Richland Operations Office  
United States Department of Energy  
P.O. Box 550; MSIN: A5-15  
Richland, Washington 99352

Dear Mr. Hebdon:

Re: Letter dated December 11, 2002, from Joel Hebdon (USDOE) to Fredrick Bond (Ecology) regarding the completion of Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) Milestone M-094-02

Letter dated November 5, 2002, from Joel Hebdon (USDOE) to Fredrick Bond (Ecology) regarding the completion of Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) Milestone M-094-02, Amendment to 324 Building Radiochemical Engineering Cells, High-Level Vault, Low-Level Vault and Associated Areas Closure Plan, Revision 1

Because the scope of the amendment to the 324 Building Radiochemical Engineering Cells, High-Level Vault, Low-Level Vault and Associated Areas Closure Plan, Revision 1 is limited to components of the 324 Building requiring closure, the Washington State Department of Ecology (Ecology) accepts the United States Department of Energy (USDOE) revision to the original amendment submitted in the November 5, 2002, correspondence. The original amendment contained a statement, "All material removed from the building will be required to be managed in accordance with WAC 173-303-610 (5)." This statement is changed to "Any dangerous waste materials generated during closure activities will be managed in accordance with WAC 173-303-610 (5)."

Submission of this amendment fulfills Milestone M-094-02. Closure performance standards are changed from clean closure in accordance with the Debris Rule "clean debris surface" to "removal". The closure plan will require revision to reflect the removal actions summarized in Table 6-1A of this amendment. Ecology does not expect the incorporation of this amendment

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into the existing closure plan to be a major revision, but rather a minor modification to the existing closure plan. The revision shall be performed in accordance with the existing 324 Building Radiochemical Engineering Cells, High-Level Vault, Low-Level Vault Areas Closure Plan, Revision 1 (DOE/RL-96-73) and Washington Administrative Code (WAC) 173-303-610 (3). All closure activities must be conducted and certified in accordance with the approved closure plan. Please submit the revised closure plan to Ecology for review and approval by January 31, 2004.

The Tri-Party Agreement Milestone M-89-00 commitment is to complete closure of the non-permitted mixed waste units in the 324 Building as described in the Closure Plan (DOE/RL-96-73). The major areas addressed by this milestone are specified in Table 6-1 of the closure plan and require removal by October 31, 2005. This amendment modifies Table 6-1 to Table 6-1A, enclosed. Due to the changes made by this amendment, the completion date for Milestone M-89-00 needs to be modified to coincide with the date for complete disposition of the 324 Building. Milestone M-94-03 sets the date for complete disposition of the 324 building as September 30, 2010. Please submit the revised Tri-Party Agreement Milestone M-89-00 change package in conjunction with the revised closure plan by January 31, 2004.

If you have any questions, please contact Jeanne Wallace at 736-3019.

Sincerely,



Fredrick Bond  
Transition Project Manager  
Nuclear Waste Program

FB:JW:lkd

**Enclosure**

cc: Nick Ceto, EPA  
Ellen Dagan, USDOE  
John Sands, USDOE  
Jon Perry, FHI  
Stuart Harris, CTUIR  
Donna Powaukee, NPT  
Russell Jim, YN  
Ken Niles, OOE  
Administrative Record