



STATE OF WASHINGTON

DEPARTMENT OF ECOLOGY

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March 15, 2002

Mr. James E. Rasmussen
Office of River Protection
United States Department of Energy
P.O. Box 450, MSIN: H6-60
Richland, Washington 99352

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EDMC

Dear Mr. Rasmussen:

Re: Hanford Federal Facility Compliance Agreement and Consent Order (HFFACO)
Milestone M-46-01H, "Concurrence on Additional Tank Acquisition" Extended Due
Date of March 15, 2002

The Washington State Department of Ecology (Ecology) has reviewed *Single Shell Tank Retrieval Sequence and Double Shell Tank Space* (RPP-8554, Rev 0) and the *Tank Space Options Report* (RPP-7702, Rev 0) provided by the United States Department of Energy's (USDOE) Office of River Protection (ORP).

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Specifically, ORP states that in Case 1 (the HFFACO compliant case), the target milestones to initiate single shell tank (SST) retrieval and complete retrieval by September 30, 2018, could not be supported by the current treatment schedule and capacity and current double shell tank (DST) capacity. Several potential actions were listed as required to meet the 2018 deadline, including an increase in tank waste treatment plant capacity and construction of new DSTs. ORP asserts that construction of new DSTs would divert resources from treatment of tank wastes and increase the number of tanks requiring closure. ORP also asserts that sufficient treatment and immobilization capacity to handle the mass of retrieved SST waste by 2018 was not technically or financially feasible.

Ecology is concerned about the results of Case 1 provided to us. If SST retrieval is conducted according to the M-45 milestones, DST tank space will reach maximum capacity in fiscal year 2010. Two new tanks will be needed by 2010 and a total of 24 new DSTs will be needed to complete the SST retrieval mission by 2018. Construction of even two tanks by 2010 reportedly cannot be accomplished given a seven-year schedule to acquire funds, design, and construct them.

Despite these concerns, Ecology is not currently proposing new milestones for acquisition of new DSTs pursuant to Milestone M-46-01H. This position is contingent upon meeting the following criteria:

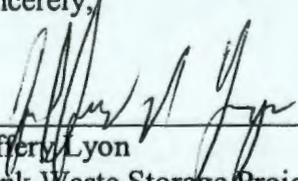
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- The Waste Treatment Plant is under construction as required by the HFFACO, by December 2002.
- Implementation of new DST space optimization measures is underway to maximize the availability of additional storage space while maintaining reasonable margins of safety. DST space optimization efforts must take into account raising allowable waste levels (which could result in an additional 1,400,000 gallons of space by April 2003), decreasing dedicated operational space (which could result in 850,000 gallons of space by September 2002), and concentrating waste (which could result in 2,200,000 gallons of space by 2008). This DST space must then be available to receive SST waste. The status of the space optimization efforts must be reported on monthly at ORP HFFACO Project Managers meetings.
- ORP must fully support near term SST waste retrieval demonstrations per the schedule in the M-45 milestones.
- ORP must engage in and support the upcoming M-45-00C negotiations.

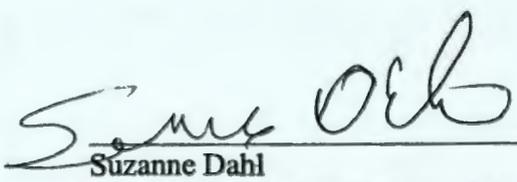
Ecology also notes that USDOE tank space cases presented to date have not taken into account recent efforts by the Tri-Party Agreement agencies' Hanford Cleanup, Constraints, and Challenges team, USDOE's Top to Bottom Review Team, or, most recently, the Tri-Party Agreement agencies' "Letter of Intent" to greatly reduce the total time and cost to complete a quality cleanup. These commitments would seem to impact USDOE assertions regarding the achievability (or unachievability) of completing SST waste retrieval by 2018, and the need for additional storage space in the near term. As such, Ecology is requesting that you provide us an assessment of their potential impacts along with attendant assumptions.

If you have questions concerning Ecology's determinations, please feel free to contact either of us as follows: Jeffery Lyon at (509) 736-3098 or Suzanne Dahl at (509) 736-5705.

Sincerely,



Jeffery Lyon
Tank Waste Storage Project Manager
Nuclear Waste Program



Suzanne Dahl
Tank Waste Disposal Project Manager
Nuclear Waste Program

JL:SD:lkd:sdb

cc: Harry Boston, ORP
Mary Beth Burandt, ORP
Joe Cruz, ORP
Robert Lober, ORP
Steve Wiegman, ORP

Roger Bowman, FH
Todd Martin, HAB
Ken Niles, OOE
Administrative Record: M-46-01H