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STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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

October 13, 2000

Clifford E. Clark  
Acting Program Manager  
Office of Regulatory Liaison  
U.S. Department of Energy  
Richland Operations Office  
P. O. Box 550, MSIN: A5-15  
Richland, Washington 99352

**RECEIVED**  
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**EDMC**

Dear Mr. Clark:

The Washington State Department of Ecology is hereby initiating Dispute Resolution at the project manager's level with regard to Hanford Federal Facility and Consent Order (HFFACO) Milestone M-91-03, pursuant to Section 9.2.1, Paragraph 4, of the Hanford Federal Facility Agreement and Consent Order (HFFACO). We have received and reviewed your letter to Mike Wilson, dated September 13, 2000, and find the information insufficient to address the deficiencies of the "Project Management Plan for Transuranic and Transuranic Mixed Waste per Tri-Party Agreement M-91-03". Specifically, your comments do not address all issues and are deficient concerning many important details; e.g., identifying all waste streams and presenting a sufficiently robust plan for all facilities necessary in their management.

In addition, the Change Requests, dated 09/28/00, Draft Change Numbers M-91-00-03 and M-91-00-04, are not acceptable for a number of reasons, including, but not limited to, failure to include required "accountability provisions" discussed with the U.S. Department of Energy at our earlier meeting, and not meeting requirements established pursuant to the M-91-00 milestone series, e.g., because they do not schedule all work related to facilities necessary for the management of TRU/TRUM waste through final disposition.

Sincerely,

  
Fred C. Jamison  
Waste Management Project Manager  
Nuclear Waste Program

FCJ:lkd

cc: Doug Sherwood, EPA  
Ellen Dagan, USDOE  
George Sanders, USDOE

