



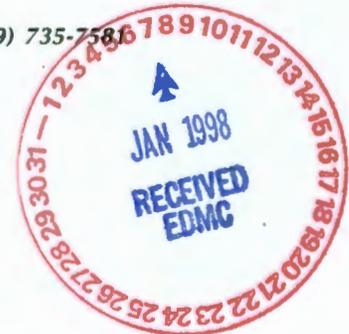
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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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

December 31, 1997

Mr. William Taylor
U.S. Department of Energy
P.O. Box 550, MSIN: A0-21
Richland, WA 99352



Dear Mr. Taylor :

Re: Data Quality Objectives (DQO) Document for the Low Activity Waste
Characterization, dated November 30, 1997

The Washington State Department of Ecology (Ecology) staff have reviewed the referenced document, submitted in fulfillment of Tri-Party Agreement Milestone M-60-14-T01. This milestone prompts Ecology's approval of this document within 30 days of receipt. At this stage, and due to the reasons depicted in the following comments, Ecology will not approve this document as submitted.

1. As mentioned in the DQO document, Ecology disagrees with the limited scope of this DQO process as it fails to cover the intended aspects of this Tank Waste Characterization. The expected product in fulfillment of this milestone was to cover all regulatory driven requirements, such as Land Disposal Restrictions(LDR), to be satisfied by this Characterization activity. This expectation was stated and recorded in every Ecology participated meeting of this DQO. It is obvious that the U.S. Department of Energy (USDOE) has decided not to comply with our requests and expectations.
2. Ecology has concerns about USDOE deviating from the DQO process as originally intended and implemented in the Tri-Party Agreement. Not all the affected and related stakeholders were invited to this DQO. The private vendors, who are the beneficiaries of this DQO did not take part in it. Agreements made during the process regarding scope were not reflected in the document.
3. The review of this document also resulted in a list of other technical comments that will be shared with your staff during the "addendum" to this DQO, planned to start in January 1998.

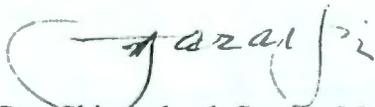
Due to its importance for the progress in the upcoming permitting phases of the Privatized Vitrification Plants, this DQO must be resumed and completed to cover all the missing aspects of

Mr. William Taylor
December 31, 1997
Page 2

Waste Characterization per the applicable federal and state regulatory requirements. DQO meetings have been scheduled for the months of January and February 1998 to finalize this process. This continuation will be focused on the regulatory LDR requirements that must be complied with during this characterization activity of the "Waste Source Tanks." A separate DQO process will be implemented to cover the Waste Analysis requirements at the "Waste Staging Tanks" to support the permitting of the new Privatized Vitrification Plants.

It is our intention to complete this DQO process as soon as possible, but no later than the end of February 1998. We appreciate the cooperation of your staff in working with us to arrange for the upcoming meetings. If you have any questions regarding the above, please contact Moses Jaraysi at (509) 736-3016 or Suzanne Dahl at (509) 736-5705.

Sincerely,



for Ron Skimmarland, Section Manager
Nuclear Waste Program

RS:MJ:ch

cc: Neil Brown, USDOE
Caroline Haass, USDOE
Kayle Boomer, BNFL
Lorna Dirks, LMAES
Administrative Record: TWRS

bcc: Suzanne Dahl. Ecology
Moses Jaraysi, Ecology
Laura Ruud. Ecology
Alex Stone. Ecology
Jerry Yokel. Ecology