



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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March 25, 1992

0020400

RECEIVED
C. J. GEIER

APR 2 1992

ACTION:
COPIES:
ROUTE:
FILE:

RECEIVED
R. H. ENGELMAN

APR 03 1992

ACTION:
COPIES: Roeder, Granger,
ROUTE: Review to Engelman
FILE:

Mr. Steve Wisness
Hanford Project Manager
U.S. Department of Energy
P.O. Box 550
Richland, WA 99352-0550

RE: Draft Class II Tri-Party Agreement Change Control Form

Dear Mr. Wisness:

Thank you for this opportunity to comment on the draft proposed milestone changes which we received on March 13. Our comments are as follows:

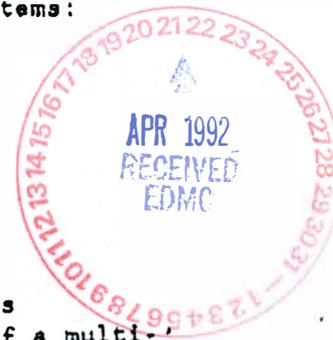
We are not certain that the action to develop a new Tri-Party Agreement Interim Milestone "Submit Evaluation of Laboratory Hot Cell Capability" duplicates existing efforts. Laboratory capabilities in a number of areas have the potential for being a choke point and holding up other activities. We think a firm date commitment contained within the TPA could be appropriate in demonstrating the commitment that we know DOE has towards filling the needs for additional laboratory hot cell capabilities.

We are satisfied with the proposed milestones for the following items:

- M-02-03-T1-Tank Farm Upgrades
- M-03-05-Vit Plant Building Foundation
- M-03-06-T1-Procure Melter

We need some clarification and correction on the following items:

- ✓ M-03-04-Canister Storage Building
The canister storage building will be built unless its construction is determined to preclude construction of a multi-purpose storage facility.
- M-03-06-Vit Building Mechanical and Piping
We thought this was construction packages 250 and 251 which are both scheduled to start on August 11, 1994.
- M-03-07-Vit Building Electrical and Instrumentation
We thought was be construction package 270 and 271 which are both scheduled to start on November 29, 1994.



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M-07-06-106C Retrieval Conceptual Design

Please delete "this interim milestone...DOE-RL site management system baseline."

M-31-02-New Double Shell Tank Farm

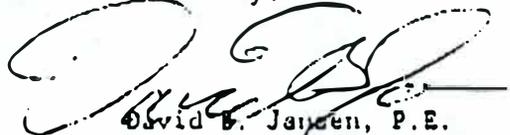
This might be acceptable with an explanation of the purpose for a multi-function waste tank facility. (e.g., safety, pre-treatment, retrieval) The change title mandates a "New Tank Farm Interim Milestone and Target Dates." No target dates were included in your submittal. Please clarify.

We have some problems with M-09-03-NEPA Notice of Intent for TWRS. It's really not worthy of a milestone date in the TPA. We certainly agree on the concept of moving towards single shell tank waste retrieval, but we're not certain how various NEPA initiatives and the Tri-Party Agreement overlap.

On several of the milestones we are not certain what is meant by the phrase "This target date is subject to incorporation...TWRS Decision Plan." We are philosophically opposed to making parts of the TPA dependent on other planning tools.

As per our discussion on March 19, we feel we're very close to reaching agreement on a number of these milestones. I appreciate your recognition on the 19th that it was going to take a little while for us to get a response to you. If you have any questions after reading this, please feel free to call me at (206) 438-7021.

Sincerely,



David E. Jansen, P.E.

Hanford Project Manager

Nuclear and Mixed Waste Management Program

DBJ:jr

cc: Paul Day, EPA
Mike Gordon, Ecology
Roger Stanley, Ecology

