



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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March 1, 1994



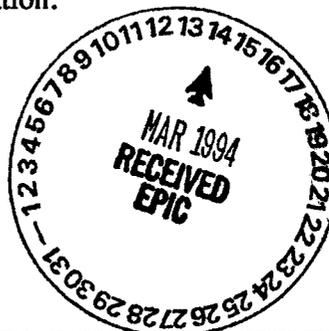
Mr. Tom Sheridan, Acting Program Manager
Office of Tank Waste Remediation Systems
U.S. Department of Energy
P.O. Box 550
Richland, WA 99352

Dear Mr. Sheridan:

This letter is intended to clarify Washington Department of Ecology (Ecology) expectations regarding Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement or TPA) commitment M-60-03-T01, "Submit Facility Options Engineering Study." As one of the earliest of our new TPA Tank Waste Remediation System (TWRS) commitments, successful completion of this study is especially important in establishing respective TWRS team (and public) confidence.

I would also like to take this opportunity to touch on two related, and somewhat troublesome perceptions which, if left unaddressed, may cause unnecessary delay and expenditures. These are: (1) comments reportedly made which indicate that some U.S. Department of Energy (USDOE) and/or Westinghouse Hanford Company (WHC) staff may believe that Ecology is biased against certain TWRS waste processing facility concepts, and (2) apparent residual resistance from some staff in accepting TPA "case beta" as a requirement which demands USDOE's full focus as systems engineering processes proceed.

While generally encouraging USDOE to continue to examine new and innovative approaches to waste treatment, Ecology has no preconceived preferences for facility configuration of TWRS pretreatment and waste vitrification processes. All practical options which meet or improve upon negotiated schedules, are open to exploration. For example, defining a low shielded, low-level vitrification system warrants further assessment which, I assume, would be based on evaluation of overall system performance, rather than from a predetermined requirement such as a specific shielding level limitation.



Mr. Tom Sheridan
March 1, 1994
Page 2

I also note that the topic of facility configuration received significant debate during the last days of our recent TPA negotiations. As a result, Ecology and USDOE agreed that our best course was to not specify particular configurations within the context of "case beta" vitrification and pretreatment milestones.

We expect that all configurations which are capable of meeting agreed on TPA schedules will be further evaluated based on environmental performance, operability, and cost (both total cost and annual cost profiles). We also believe that no plausible facility configuration concept which meets the terms of the TPA¹ should be dropped from consideration prior to completion of the subject Facility Options Engineering Study.

At the same time, I must note that I am concerned about the potential to continually re-evaluate options which have received significant attention in the past, and which clearly fall far outside the requirements of new TWRS TPA milestones. I believe it is not in either of our interests to revisit options which are inconsistent with our agreed on TWRS strategy (except as required by National and State Environmental Policy Acts). For example, it would be non-productive, and would send the wrong message to Hanford stakeholders for USDOE to continue studying TWRS strategies which involve terminal waste forms other than glass, extensive separations, or in-situ disposal of tank wastes.

TWRS schedules in our revised TPA require that a thorough and broad evaluation of reasonable alternatives for pretreatment and waste vitrification must take place soon. USDOE must quickly establish a solid technical foundation from which to take future actions. Following completion of the Facility Options Engineering Study, Ecology and other Hanford stakeholders will expect USDOE to move beyond the wide ranging study phase and into a focused design phase for a selected alternative. This facility conceptual design effort is expected to parallel melter development work during 1994 through 1996. Consequently, as USDOE completes its study, it must also be establishing a solid technical foundation for proceeding with facility conceptual design. I trust that USDOE will provide all resources necessary to meet M-60-03-T01 study objectives.

¹ e.g., glass terminal waste form, simple pretreatment, start of low-level waste facility construction in 1997, start of low-level waste vitrification in 2005, completion of waste processing by 2028.

Mr. Tom Sheridan
March 1, 1994
Page 3

Ecology participation early, and throughout these configuration studies will improve the likelihood that our agencies and other Hanford stakeholders will have congruent expectations for the Facility Options Engineering Study. I would appreciate it if you would ask your staff to coordinate Ecology (M-60-03-T01) involvement with Mr. Toby Michelena, of the Nuclear Waste Program at (206) 407-7144.

Sincerely,



Roger Stanley, Director
Tri-Party Agreement Implementation
Nuclear Waste Program

RS:j

cc: Becky Austin, WHC
Doug Sherwood, USEPA
Steve Wisness, USDOE

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Subject: CLARIFICATION OF WASHINGTON DEPARTMENT OF ECOLOGY'S EXPECTATIONS REGARDING TRI-PARTY AGREEMENT COMMITMENT M-60-03-T01.

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